

# ESEA Flexibility

## Peer Panel Notes



**State Request:** Kansas

**Date:** March 30, 2012

## REVIEW AND EVALUATION OF REQUESTS

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

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

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

## Review Guidance

## Consultation

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

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

**Consultation Question 1 Panel Response**

*Tally of Peer Responses: 6 Yes, X No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• The Kansas State Department of Education (KSDE) solicited input from teachers and their representatives on the request through webinars, listservs, a dedicated email address and KSDE's annual conference, as well as having them participate in committees and workgroups.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• Teachers and their representatives participated in the content standards committee; were involved in designing, developing and piloting the Kansas Educator Evaluation Protocol; helped define the guidelines for teacher and leader evaluation systems; and participated in the Flexibility Request Principle 3 Workgroup (p. 13, att. 2).</li> <li>• The Committee of Practitioners met and were informed and updated on the request (p. 13).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• The state did not provide clarity on what is presented at the summer academies teachers helped design (p. 13).</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Not indicated.</li> </ul>

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: 5 Yes, 1 No**

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE engaged and solicited input from parent groups, community-based organizations, civil rights organizations, business organizations and organizations representing students with disabilities through meetings, webinars, KSDE's website, and surveys.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE held meetings and webinars followed by a survey to solicit input on the request from participants (p. 15).</li> <li>• KSDE created five work groups to design the flexibility request. The work groups included KSDE staff, the director of the Kansas Parent Information Resource Center (PIRC), members of the Kansas Technical Assistance System Network, members of the Kansas National Education Association, members of the United School Administrators and district representatives (p. 16).</li> <li>• KSDE is providing transparency and stakeholder involvement through its website (p. 16).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Some peers feel that, while KSDE engaged several parent groups, civil rights organizations and special education advocates, it is unclear whether students, organizations representing English Learners or Indian tribes were engaged in providing input based on the information and attachments provided (p. 15 and pp. 129-134).</li> <li>• KSDE did not provide a list of the 34 organizations that the Kansas Learning First Alliance represents (p.15).</li> <li>• The panel would have appreciated more specific examples of how KSDE modified its request based on input from groups, particularly regarding English Learners and students with disabilities.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>KSDE should continue to involve students, English Learner representatives and Indian tribe representatives in the implementation of the waivers sought.</li> </ul>

## 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: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>A transition plan to the Kansas Common Core State Standards (CCSS), including its alignment and curriculum and assessment, is the foundation of all three principles within ESEA flexibility. KSDE’s lack of a strong transition plan calls into question its ability to successfully implement the flexibility.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>KSDE established its own committees to review and revise the State’s mathematics and English/language arts standards at the same time the CCSS were underway and was able to provide feedback that was included in the final drafts of the CCSS (p. 22).</li> <li>A Multi-Tier System of Support and the KSDE technical assistance network are in place (p. 23).</li> <li>KSDE is proposing a transition plan which includes a communication plan, a professional learning plan, a series of training and information workshops, and partnership with institutions of higher education (IHEs).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Based on the timeline provided, it is questionable whether the CCSS will be implemented no later than the 2013-2014 school year (p. 152-53).</li> <li>• Lack of substantive detail regarding the transition plan left some peers wondering about KSDE’s ability to transition all schools and districts to the CCSS in a meaningful way. Furthermore, peers were unclear as to the extent to which the plan addresses the impact CCSS have on curriculum and assessment.</li> <li>• While KSDE plans to conduct training, its request had no information about selection or training of workshop leaders, staff, etc.</li> <li>• Lack of details concerning the involvement of teacher and leader preparation programs in rolling out CCSS.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should flesh out its proposed plan to include details outlined in the ESEA flexibility guidance (e.g., translating standards into a high quality/accessible curriculum, developing accompanying materials and assessments, identifying and developing trainers, and implementing strategies to increase district capacity to roll out the standards).</li> <li>• KSDE should ensure that faculty and the curriculum within teacher and leader preparation programs (IHE and alternative certification) reflect knowledge of the CCSS.</li> <li>• KSDE should ensure follow through with finalizing and implementing a strategic communication plan.</li> </ul>

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

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

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• A transition plan to the Kansas CCSS, including its alignment and curriculum and assessment, is the foundation of all three principles within ESEA flexibility. KSDE’s lack of a strong transition plan calls into question its ability to successfully implement the flexibility. Furthermore, KSDE has not provided a clear plan on how English Learners, students with disabilities or low-achieving students will have equitable access to the higher standards.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• In 2012, the summer academies will focus on the impact of the CCSS on English Learners, special education students, and higher education, both from the readiness component to the teacher preparation aspect (p. 24).</li> <li>• KSDE is participating in two studies concerning alignment of the State’s current English proficiency standards (ELP) with the CCSS (p. 25).</li> <li>• KSDE is developing a pilot test for the ELP assessment (p. 25).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• It is unclear if teachers and advocates of English Learners were included in the internal workgroup for the Multi-Tier System of Support (p. 22).</li> <li>• KSDE has not provided a clear plan on how English Learners, students with disabilities or low-achieving students will have equitable access to the higher standards (p. 24).</li> <li>• It is unclear how the State will implement the assessments being created by the Smarter Balanced Assessment Consortium (p. 152).</li> <li>• The timeline provided to implement the standards does not indicate when KSDE will align the ELP standards with the CCSS (p. 152).</li> <li>• KSDE’s request provides inconsistent information regarding when the new ELP assessment will be implemented. Attachment 6 indicates 2013-14 (p. 163-164), while the text of the request indicates 2015 (p. 25).</li> <li>• There is no mention in this section of how students with disabilities will be provided access to the CCSS.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should develop a clear plan on how English Learners, students with disabilities or low-achieving students will have equitable access to the higher standards.</li> <li>• KSDE should provide an alignment crosswalk between the ELP assessments and the assessments being created by the Smarter Balanced Assessment Consortium.</li> </ul>

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

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

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

**If the SEA selected Option B:**

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



**1.C, Option B Panel Response**

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

Tally of Peer Responses: X Yes, X No

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

**Principle 1 Overall Review**

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

**Principle 1 Overall Review Panel Response**

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>A transition plan to the Kansas common core state standards, including its alignment and curriculum and assessment, is the foundation of all three principles within ESEA flexibility. KSDE’s lack of a strong transition plan calls into question its ability to successfully implement the flexibility. Furthermore, KSDE has not provided a clear plan on how English Learners, students with disabilities or low-achieving students will have equitable access to the higher standards.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>KSDE is proposing a transition plan which includes a communication plan, a professional learning plan, a series of training and information workshops, and partnership with IHEs (p. 23-4).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>Lack of substantive detail regarding the transition plan left some peers wondering about the ability of KSDE to transition all schools and districts to the CCSS in a meaningful way. Furthermore, peers were unclear as to the extent to which the plan addresses the impact CCSS have on curriculum and assessment.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should flesh out its proposed plan to include details outlined in the ESEA flexibility guidance (e.g., translating standards into a high quality/accessible curriculum, developing accompanying materials and assessments, identifying and developing trainers, and implementing strategies to increase district capacity to roll out the standards). Furthermore, KSDE should develop a clear plan for how English Learners, students with disabilities or low-achieving students will have equitable access to the higher standards.</li> <li>• KSDE should ensure follow through with finalizing and implementing the strategic communication plan.</li> </ul>

## 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: 5 Yes, 1 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>KSDE proposes a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• To ensure sufficient support and assistance is available to all identified schools and districts, KSDE is redesigning its current technical structures to include KSDE teams, the Kansas Learning Network, and the Technical Assistance Systems Network. KSDE intends to use these collaborative efforts to maximize capacity (p. 29).</li> <li>• The philosophical grounding of KSDE’s proposed system is strong and reflects an asset-based set of aspirations for students and their teachers (p. 30). KSDE has translated its vision for students and teachers into a system that captures a range of student outcomes.</li> <li>• KSDE has demonstrated a commitment to focus on all students equally as opposed to those primarily on the threshold of proficiency (p. 32).</li> <li>• KSDE’s accountability system also includes a focus on advanced learners (p. 32).</li> <li>• Teachers will be able to share growth charts with parents (p. 34).</li> <li>• KSDE acknowledged the stigma associated with low-performing subgroups, using comparisons of the top performing 30 percent of students to the bottom performing 30 percent of students while still reporting on subgroups and creating structures to ensure the growth of students in subgroups across districts (i.e., safety measure) (p. 34).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• It is unclear how support and assistance will be coordinated and how student achievement will be positively affected.</li> <li>• It is unclear how easily the proposed model can be understood by teachers, parents, board members, and stakeholders.</li> <li>• There is a lack of clarity of whether KSDE intends to identify charter schools as priority schools and provide outlined supports to these schools. Charter schools need to be held accountable according to state charter law. Charter school authorizers should close low-performing charter schools (i.e., charter schools that are identified as priority schools).</li> <li>• Tentative language in the request erodes KSDE’s credibility. It appears to imply a lack of commitment to this principle (e.g., p. 28 “this system should,” multiple statements including the word “may”).</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Given theoretical orientation and commitment to local decision making (p. 30), KSDE should provide technical assistance to local educational agencies (LEAs) to build their capacity to implement the proposed improvement strategies in a high-quality manner.</li> <li>• KSDE should share best practices identified at the LEA level.</li> </ul>

- 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: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE’s accountability system provides differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE mentions that the adjusted cohort graduation rate data will be included in the differentiated recognition, accountability and support system and is considered in identifying focus and priority schools (p.37).</li> <li>• KSDE has outlined a plan to identify Title I priority and focus schools that will implement interventions based on the needs of the school beginning in 2012-13 (p. 28).</li> <li>• To ensure sufficient support and assistance is available to all identified schools and districts, KSDE is redesigning its current technical structures to include KSDE teams, the Kansas Learning Network, and the Technical Assistance Systems Network. KSDE anticipates that, through these collaborative efforts, capacity will be maximized (p. 29).</li> <li>• To ensure that all subgroups are advancing, KSDE has developed an Assessment Performance Index (API) that rewards schools for moving any and all students to higher proficiency levels and captures the whole distribution of student performance (p. 32).</li> <li>• The philosophical grounding of the proposed accountability system is strong and reflects an asset-based set of aspirations for students and their teachers (p. 30). KSDE has translated its vision for students and teachers into a system that captures a range of student outcomes.</li> <li>• KSDE has demonstrated a commitment to focus on all students equally as opposed to those primarily on the threshold of proficiency (p. 32).</li> <li>• On page 30, KSDE points to international research to say that the primary emphasis should not be on accountability but on system reforms like selecting, training, and keeping the most talented individuals as educators.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Based on the Student Growth Percentile (SGP) model, KSDE has established an annual measurable objective (AMO) growth target that requires schools to fall within the top half of the distribution of all school growth medians in order to meet the AMO target. By definition, this means that only half of the schools will meet the yearly growth goal (p. 34).</li> <li>• Details are lacking with regard to how the graduation rate data will be included in the system, including how they will be used to identify focus and priority schools.</li> <li>• It is unclear how easily the proposed model can be understood by teachers, parents, board members, and stakeholders.</li> <li>• On page 29, the proposal mentions that KSDE has partnered with education service centers to ensure that school improvement experts are readily available to all districts in the State, but no real information is provided about these centers.</li> <li>• While commitment to focus on all students equally as opposed to those primarily on the threshold of proficiency is commendable, it must be done in a manner which provides safeguards against masking the achievement of low-performing students (e.g., one high-performing student earning 1000 points has the potential to mask the achievement of low-performing students).</li> <li>• It is unclear to what extent the “request support” button on KSDE’s website has been piloted or used. It seems to be a somewhat superficial solution to a complex problem (i.e., how to go about building district capacity) (p. 29).</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Given theoretical orientation and commitment to local decision making (p. 30), KSDE should provide technical assistance to LEAs to build their capacity to implement the proposed improvement strategies in a high-quality manner.</li> <li>• KSDE should create a safeguard to ensure masking the achievement of low-performing students is prevented.</li> </ul>

- 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: 3 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>KSDE’s accountability system provides differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools. However, peers have concerns about the extent to which all subgroups of students will be adequately identified to be recognized and/or supported in order to close the achievement gap.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>Two achievement gap measures will be calculated for each school. These gap calculations will allow schools to identify their state-level and local-level achievement gaps. To measure state-level achievement gaps, KSDE developed a state benchmark based on the school performing at the 70th percentile (p. 34).</li> <li>KSDE’s model recognizes differences in the various geographic areas of the State (e.g., rural) and allows for the identification of underperforming students outside of traditional ESEA subgroups.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>KSDE’s focus on all students equally as opposed to those primarily on the threshold of proficiency may result in masking the achievement of low-performing students (e.g., one high-performing student earning 1000 points has the potential to mask the achievement of low-performing students) in the absence of adequate safeguards.</li> <li>No specific information is provided about the performance of subgroups over time to identify whether there are issues and to analyze the magnitude of those issues.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>KSDE should create a safeguard to ensure masking of the achievement of low-performing students is prevented.</li> </ul>

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

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



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

- 2.A.ii** Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?
- a. Note to Peers: Staff will review 2.A.ii.a
  - b. Does the SEA’s weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State’s college- and career-ready standards?
  - c. Note to Peers: Staff will review 2.A.ii.c

**2.A.ii.b PANEL RESPONSE**

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

*Tally of Peer Responses: X Yes, X No*

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

**2.B Set Ambitious but Achievable Annual Measurable Objectives**

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

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts 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: 2 Yes, 4 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE has outlined new and ambitious but achievable AMOs which will be in effect with the 2012-2013 school year for all student groups, schools, districts and the State (p. 28).</li> <li>• KSDE is requesting a waiver from the Secretary of Education regarding the 2012 AMOs for determining adequate yearly progress (AYP). KSDE requests permission to use the 2011 AMOs rather than the 2012 AMOs as approved in KSDE’s Accountability Workbook when calculating AYP results in 2012. However, reward, priority and focus schools will be identified using 2011-2012 achievement and growth data (p. 28).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE wants to build a system that accurately identifies those schools in which students are persistently not improving; credits schools for all student gains (growth); credits schools for the gains they have made over time; and ensures lowest-performing students are improving while the higher-performing students continue to improve.</li> <li>• AYP will not be determined beginning in 2012-13. Rather, the emphasis will shift to achievement, growth and reducing the achievement gaps, and implementing the interventions that improve student learning (p. 39).</li> <li>• KSDE states in its request, “[b]ecause all three areas — achievement, growth, and gap — are dimensions of the same state assessments, one expects that progress in one area will lead to progress in the others. Because our design is dynamic and sets in motion continuous improvement goals, we expect that as schools improve in each area, all schools will be required to keep up with each other” (p. 49). KSDE goes on to say that participation rate, attendance rate, and graduation rate will continue to be reported as descriptive statistics.</li> <li>• The school and district report cards will display AMO data by showing achievement, growth, and reducing the gap data and indicate whether or not the AMOs were met. Data will be reported for the all students group and as appropriate for each of the student groups as required by the Elementary and Secondary Education Act of 1965 (ESEA), as amended (Addendum).</li> <li>• A chart on page 40 illustrates the working of the API. One implication of this new system of achievement is that as the buildings classified as priority or focus schools or those below the school at the 20th percentile improve, other buildings will have to continue to improve to avoid falling to a lower relative position (p. 44).</li> <li>• AMOs recognize the progress of advanced learners (p. 40).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• As previously stated, the API is structured so that the high performance of some students can mask the underperformance of other students. This raises questions about the ambitiousness of KSDE’s target AMOs (Addendum, p. 9).</li> <li>• The intention to use graduation rate data is unclear.</li> <li>• For each assessment category in which a student advances, a school gains 250 points (p. 40). It is not clear precisely how that works and Table 3, which purports to provide the relevant information, did not assist.</li> <li>• Language regarding “natural ceiling and plateaus” needs additional clarification in order to prevent lowering expectations (p. 44).</li> <li>• On page 44, KSDE states that once the “all students group” shows four continuous years of no or small vacillations around the same level (less than 10 point changes around the same mean), all schools falling within two standard deviations of the plateau will be designated as meeting their achievement goal. Peers expressed concern about whether this will be transparent to stakeholders and about the need to ensure continued attention to improving performance of underachieving students.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should create a safeguard to ensure masking of the achievement of low-performing students is prevented.</li> </ul>

## 2.C Reward Schools

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

### 2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>The methodology for identifying highest-performing schools relies on the API and, as outlined in prior sections, concerns were raised about the potential of masking the performance of under-performing students. Therefore, the methodology for identifying highest-performing schools is questionable. Peers were comfortable with the soundness of the method for identifying high progress schools.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>To identify its highest-performing schools, KSDE ranks all Title I buildings based on their API scores. These rankings are combined and the buildings are ranked again. The Title I schools in the top five percent of all Title I schools based on four years of API scores will be identified as the highest-performing schools.</li> <li>To identify high-progress schools, individual student growth percentiles (SGPs) are combined for both reading and mathematics. When there are at least 30 students with a growth measure, the median of the combined SGPs is selected as representative of each school's student growth for that year. All Title I buildings are ranked based on their median SGPs for each of the most recent four years. These rankings are then combined and the buildings falling in the top five percent are identified as high-progress schools.</li> <li>The preliminary list includes 10 percent of all Title I schools. The list is composed of the top five percent of all Title I schools based on four years of API scores combined with the top five percent of all Title I buildings ranked by their median SGPs for each of the most recent four years, for a total of 66 schools (p. 51).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>See above.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>None indicated.</li> </ul>

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

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

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

**2.C.iii PANEL RESPONSE**

*Tally of Peer Responses: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE has adopted multiple means of recognizing reward schools, which should provide an incentive for all schools to improve their performance.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE has adopted multiple means of recognizing schools, which should provide incentives for all schools to improve their performance. The various forms of recognition for reward schools include: recognizing districts with one or more reward schools at a State Board of Education meeting; creating a banner for the school’s website which can be displayed to notify the public of the school’s status; providing an option representatives of the school to present at the Annual KSDE Conference with fees waived for presenters; providing an opportunity for staff to attend a KSDE sponsored event of their choice with a reduced fee; and providing opportunities for staff to serve as mentors to focus or priority Schools with similar demographic compositions. The staff of reward schools will expand their expertise by working with an identified mentee school.</li> <li>• KSDE expects that reward schools will continue to take steps necessary to ensure the systemic implementation and sustainability of evidence-based practices, effective family engagement, and meaningful interventions to ensure students with disabilities and English Learners demonstrate progress (p. 53).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• None indicated.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should provide additional information about how it will educate school boards about reward school processes.</li> </ul>

## 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: 4 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"><li>• The interventions that KSDE described are aligned with the turnaround principles and could result in systemic change in priority schools, but KSDE’s request lacks detail about certain aspects of the interventions (p. 54-79).</li></ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE determined that the most meaningful interventions that will promote systemic change to benefit all student populations would be achieved by implementing KSDE’s turnaround plan beginning in the first year that a school is identified as a priority school (Addendum).</li> <li>• KSDE will support districts with Title I priority schools in the identification of the root causes of their low achievement and apply meaningful interventions that support the implementation of effective practices to address the issues (p. 58).</li> <li>• KSDE will use the MTSS (Kansas Multi-Tier System of Supports). It is a systemic approach to supporting the learning of all students, including students with disabilities and English Learners, by helping districts and schools build a continuum of increasingly intense evidence-based interventions designed to match students’ academic and behavioral needs (p. 58).</li> <li>• Beginning on page 60 of the request, KSDE lists the required strategies that it will use to work effectively with districts that have priority schools. These strategies are based on all seven turnaround principles of ESEA flexibility: provide strong leadership; enable effective educators; maximize learning time; ensure rigorous curriculum; utilize data analysis; establish safe school environments; and grow family and community engagements.</li> <li>• KSDE will begin implementation with an in-depth District Needs Assessment of each district that has at least one priority school. The District Needs Assessment will provide information about the strengths as well as areas of improvement for the district and will be used to develop the School Action Plan of the priority school. This School Action Plan will include the meaningful interventions aligned with the turnaround principles (Addendum).</li> <li>• District and priority school staff and administrators will use the Self-Correcting Feedback Loop, which is a communication tool that utilizes a problem-solving process to continually collect data, analyze results and make adjustments aimed at positively influencing student learning and achievement.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE’s request lacks clarity about the content and use of the needs assessment as well as procedural quality controls (i.e., do the needs assessments provide the information that is helpful?).</li> <li>• KSDE’s request lacks sufficient details about parent and family engagement for non-native speakers in priority schools.</li> <li>• Concerns about the quality and depth of professional development for staff in priority schools led peers to question whether the interventions will ultimately be successful at improving student achievement.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Given time required to conduct needs assessments, develop quality control mechanisms to track value added.</li> </ul>

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

**2.D.iii.b (including questions (i)-(iii)) Panel Response***Tally of Peer Responses: 3 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• The identified interventions to be implemented in priority schools could increase the quality of instruction in priority schools, improve the effectiveness of the leadership and the teaching in these schools, and</li> <li>• improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students. However, some peers had concerns about the lack of detail related to certain aspects of the interventions and about the capacity of districts to implement the interventions with the rigor needed to drive systemic change.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• Beginning on page 69 of the request, KSDE presents a three-year timeline indicating what happens each year of implementation of interventions in a priority school. For each year, there are processes that the State, districts and the priority schools must follow in terms of planning, technical assistance, and on-going progress monitoring.</li> <li>• The District Action Plan (DAP) must include professional development for staff who work with students with disabilities and English Learners. The DAP will indicate specifically how each required intervention will be carried out.</li> <li>• The district leadership team is made up of decision makers representing diverse stakeholder groups including students with disabilities and English Learners (p. 59).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• On page 70 of the request, KSDE notes that DAPs must be submitted to the Kansas Integrated Innovation Team for review and approval. It is unclear whether these plans are submitted electronically.</li> <li>• There seem to be a myriad of resources, but it is unclear how they are coordinated or how they will be evaluated.</li> <li>• The request lacks clarity regarding how KSDE plans to develop a pipeline to ensure that there are principals prepared to serve as turnaround leaders (p. 60).</li> <li>• It is unclear whether districts have sufficient capacity to select and implement instructional and professional development strategies that will have the greatest impact with a depth of rigor needed to drive systemic change.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should provide technical assistance to LEAs’ human resource offices regarding how the offices can be regarded as levers for change, as opposed to just process offices.</li> <li>• KSDE should ensure that SEA resources are used to support professional development that elevates LEA capacity in the form of high quality coaches, staff developers, etc.</li> </ul>

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• Peer reviewers expressed concern about an apparent lack of urgency to implement some interventions in at least some priority schools (in addition to the schools already identified for SIG) in the first year of ESEA flexibility. For instance, KSDE plans to devote the first year to conducting a needs assessment in each priority school.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• None indicated.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Allocating a full year to planning and needs assessment in priority schools does not reflect spirit of ESEA flexibility.</li> <li>• KSDE’s request lacks a timeline indicating sense of urgency for priority schools.</li> <li>• The peers’ phone call with KSDE did not provide specific details regarding the implementation timeline.</li> </ul>

<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should focus resources to at least some priority schools other than schools receiving School Improvement Grant (SIG) funds prior to 2014-2015.</li> <li>• KSDE must clearly signal a sense of urgency to intervene in the lowest-performing schools, which is critical to successful change efforts.</li> </ul>
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**2.D.v** Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

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

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

*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• Given that KSDE’s exit criteria for priority schools so heavily rely on AMOs, peers expressed concern about the criteria.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE has articulated exit criteria for priority schools. In particular, when a priority school meets the following conditions for two consecutive years, it will exit priority status: (1) meets its achievement AMO by increasing its API appropriately; and (2) maintains an SGP median in the top 50 percent for all growth medians.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• It is unclear if KSDE has established reasonable expectations for exiting priority status in light of the prior concerns raised about KSDE’s proposed AMOs (i.e., only 50 percent of schools can meet the AMOs in a given year). Peers raised questions about whether priority schools would ever be able to exit status and/or whether their only means of exiting would be to displace other schools that may or may not be underperforming.</li> <li>• The process to exit priority status includes the word “appropriate,” which is not quantified.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should run models applying its exit criteria using AMO calculations to assess the feasibility of exiting schools in a timely manner.</li> </ul>

**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*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE describes 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.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• Focus schools will first be identified using a gap analysis that draws attention to the percent proficiency gap between the State’s top performing schools and the lowest-performing students in each school. This state-gap analysis ensures that schools with the widest gaps (i.e., largest number of non-proficient students) are identified as focus schools.</li> <li>• The second gap analysis (at the local level) draws attention to the performance difference between the highest performing 30 percent of students and the lowest performing 30 percent of students within the same school. This two-step process identifies schools with the greatest achievement gap and provides achievable standards by which to reduce their achievement gap (p. 80).</li> <li>• Focus schools are identified as those Title I schools with greatest gap between the State Benchmark (70th percentile) and their lowest performing students. The approach essentially compares the lowest-performing 30 percent of students in each school to the highest-performing 30 percent of schools in the State. The basis of measurement for this gap calculation will be the “all students” percentage at proficiency or above proportion as determined by performance on KSDE’s mathematics and reading assessments, using the four previous years (in order to maximize reliability) of assessment results.</li> <li>• Focus schools will equal at least 10 percent of the number of Title I schools in the State. Additionally, any Title I high school with a graduation rate less than 60 percent for two to three years will be automatically designated a focus school, regardless of its achievement gap (p. 82).</li> <li>• API scores are calculated separately for the highest-performing 30 percent of students and the lowest-performing 30 percent of students. The API scores are then subtracted from each other to produce the local-level gap scores (p. 83).</li> <li>• KSDE wants to ensure that small schools are included in the proposed gap calculation. In schools with subgroup populations less than 30, those subgroups were exempt from some accountability standards. By adopting the proposed gap calculations, small KSDE schools will be included in the gap calculations. This is possible because all schools, regardless of subgroup population size, have proportions of high- and low-performing students.</li> </ul>



<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE has created a strong but complex method to capture smaller schools that might otherwise be missed. However, peers have concerns about whether this will be understood by stakeholders.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• None indicated.</li> </ul>

**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: 2 Yes, 4 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE’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, but the peers have concerns about districts’ capacity to implement interventions in focus schools and KSDE’s failure to differentiate between the level of resources to be devoted to priority schools and those to be devoted to focus schools.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE is requiring focus schools to implement strategies and interventions that are evidenced-based and appropriate in delivery and intensity. To support this effort, KSDE has the Multi-Tier System of Supports (MTSS), a systemic approach used in effective KSDE schools to support the learning of all students by helping districts and schools build a continuum of increasingly intense, evidence-based interventions designed to match students’ academic needs. MTSS is aligned with the turnaround principles with a focus on system-level change across the classroom, school, and district. Effective schools that have implemented MTSS principles with fidelity have improved how KSDE districts serve students with disabilities and English Learners (p. 86)</li> <li>• A menu of meaningful interventions and annual planning responsibilities are listed on pages 90-105 of the request.</li> <li>• KSDE committed to abide by the timeline required for implementing interventions in focus schools (i.e., focus schools will begin implementing interventions in the 2012-2013 school year) (p. 28).</li> <li>• KSDE committed to conducting a root cause analysis to support focus schools (p. 86).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE made no specific mention of the work to be done with high schools that are identified as focus schools.</li> <li>• Peers were disappointed by the decision to copy and paste the timeline for priority schools into the focus schools section with little effort to tailor the implementation of timeline. This raises concerns about KSDE and districts' ability to allocate the same level of resources to focus schools as priority schools, which defeats the purpose of differentiating support based on need (i.e., focus schools are not intended to receive the same level of intervention as priority schools).</li> <li>• It is unclear whether districts have sufficient capacity to select and implement instructional and professional development strategies that will have the greatest impact with a depth of rigor needed to drive systemic change.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should undertake a thorough assessment of the needs of focus schools and the realistic ability of KSDE to provide support and develop an appropriate set of support and interventions to meet the needs of that category of schools. KSDE should ensure that it follows through with the root cause analyses.</li> </ul>

**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: 4 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>KSDE provides criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>A building must decrease in annual equal increments half the gap distance between the lowest-performing 30 percent of students and the highest-performing 30 percent of students by the 2016-17 school year. To be removed from the focus school list, a school must maintain progress toward this annual gap reduction for two consecutive years, or the combined two-year gap reduction must meet or exceed twice the amount of annual gap reduction.</li> <li>Any focus building with an API score equal to or greater than 500 for two consecutive years for its lowest performing 30 percent of students will be removed from the focus school list. An API score of 500 for the lowest-performing 30 percent of students suggests that the lowest-performing students are, on average, achieving proficient assessment scores (p. 107).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>KSDE's request lacks clarity regarding the projected timeline for implementation of interventions in focus schools and related steps if the timeline is not met (e.g., it appears that a school might languish in focus school status until 2016-17).</li> <li>Peer reviewers were concerned by KSDE's exit strategy (p. 107). As written, a school could exit by reducing the achievement gap between the highest thirty percent and the lowest 30 percent through a reduction in achievement of the top 30 percent.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>KSDE should review its proposed system to ensure that a reduction in the achievement gap that permits a school to exit focus status is not caused by a decrease in performance by the higher-performing students.</li> </ul>

**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: 1 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE’s differentiated recognition, accountability, and support system provides 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. However, KSDE’s plan lacks sufficient detail for the peers to determine whether the strategies will be effective at improving achievement. In addition, it is unclear whether districts have sufficient capacity to select and implement the strategies.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE provides numerous resources which are available to all school districts to support school improvement, including guidance, tools, training, technical assistance and Technical Assistance System Network (TASN).</li> <li>• KSDE has been actively engaged in building the capacity of educators to successfully engage in school improvement activities, including how to conduct a needs assessment, data analysis, improvement planning and training interventions. Further, KSDE has partnered with educational service centers around the state to make sure that school improvement experts are readily available to all districts (p. 109).</li> <li>• Title I schools are identified as “making progress” schools when progress is shown in at least one measure of achievement gain, growth or gap. These schools will be awarded with a recognition certificate from KSDE as well as having an opportunity for staff to attend a KSDE sponsored event of their choice with a reduced fee (p. 110).</li> <li>• “Not making progress” schools are not making any of three annual measurable objectives as measured in achievement gain, growth, and gap. If a district also has priority or focus schools, then improvement planning must also address “not making progress” schools. The required DAP will detail what the district will do to support each priority, focus and “not making progress” school. If a district does not have priority or focus schools but does have “not making progress” schools, the district will take steps necessary to ensure the systemic implementation of research-based interventions (p. 111).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE’s plan for how to address Title I schools that are not making progress lacks detail, making it difficult for peers to judge the exact nature of, and potential impact on, the activities.</li> <li>• It is unclear whether districts have capacity to select and implement instructional and professional development strategies that are likely to have the greatest impact with a depth of rigor needed to drive systemic change.</li> <li>• KSDE’s request lacks clarity regarding the selection and role of external service providers (p. 111).</li> <li>• KSDE’s request lacks clarity about unique steps for schools that do not exit “not making progress” status after two years (e.g., the request lacks a statement for “not making progress” schools that is equivalent to the statement regarding consequences for districts that do not make progress for two years) (p. 111).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• While incentives are noted, we would encourage KSDE to consider additional incentives that might have a greater impact on schools (e.g., encourage teachers and leaders from “making progress” schools to share their practices with colleagues to leverage their expertise).</li> <li>• Consider options for innovative awards, such as fewer reporting requirements and directing funds to build principal and teacher leadership opportunities (e.g., provide opportunities to teachers or principals to speak to other schools about their efforts to close the achievement gap, and identification of “lab schools”).</li> </ul>

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

**2.F.ii Panel Response**

*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• Due to concerns outlined in previous sections, the peers did not feel that outlined supports and incentives would result in improved student outcomes.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• On page 110 of the request, KSDE indicates that each district will continue to monitor the progress of all students, including students with disabilities and English Learners.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE’s plan for how to address Title I schools that are not making progress lacks detail, making it difficult for peers to judge the exact nature of, and potential impact on, student achievement, including for students with disabilities and English Learners.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• None indicated.</li> </ul>

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

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



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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE is building a monitoring and an integrated service component into its efforts. It is unclear how timely the monitoring will be. In addition, KSDE seems more focused on monitoring than actually building capacity. Moreover, KSDE's request lacks sufficient details regarding its capacity-building efforts for the peers to determine whether KSDE's plans are likely to be successful.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• TASN supports are designed to be delivered at varying levels of intensity based on the district's need (p. 29).</li> <li>• On page 112 of the request, KSDE describes its Integrated Accountability System (IAS), which is an annual, integrated continuous process involving data collection, data verification, identification of accreditation status, improvement action and/or corrective action planning, public reporting, application of rewards and enforcements and provision of targeted technical assistance and professional development. KSDE teams verify the data.</li> <li>• KSDE has an established MTSS (p. 184-204).</li> <li>• Kansas Integrated Innovation Teams (KIIT) are being developed by KSDE to monitor and offer technical assistance to priority and focus schools. They have cross-team representation including special education, ESEA programs including Title I, Title III (English Learners), assessments, and school improvement (pp. 112-113).</li> <li>• KSDE is involved in two projects to provide professional development for English Learner teachers: the project with the Institute for Educational Research and Public Service at the University of Kansas and Project KORE (pp. 113-114).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<p><i>Weaknesses, issues, lack of clarity</i></p>	<ul style="list-style-type: none"> <li>• KSDE’s request lacks detailed information about how KSDE plans to specifically build capacity of LEAs to fully leverage ESEA flexibility and lacks information about KSDE’s means of holding districts accountable for fulfilling the objectives related to providing differentiated support.</li> <li>• IAS is described as an “annual” event, but it is unclear why the data are not collected and revised on a live continuous basis, particularly if the data are actually used for decision making.</li> <li>• KSDE did not 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.</li> <li>• What purports to be a description of capacity building seems more heavily focused on monitoring than building capacity (pp. 113-15).</li> <li>• It is unclear whether districts have capacity to select and implement instructional and professional development strategies that are likely to have the greatest impact with a depth of rigor needed to drive systemic change.</li> <li>• It is unclear whether KSDE is providing professional development to content area teachers to improve the progress and performance of English Learners.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should ensure that SEA resources are used to support professional development that elevates LEA capacity in the form of high quality coaches, staff developers, etc.</li> <li>• KSDE should support schools and LEAs to develop the capacity to implement the improvement strategies in a high-quality way using external technical assistance providers as needed. Some districts may need targeted assistance related to developing performance-based contracts with external vendors to make certain that the contracts lead to the greatest positive impact for students.</li> <li>• Given KSDE’s decision to defer to LEAs for many decisions related to differentiated support, significant resources should be devoted to communicating LEAs’ role and expectations in order to ensure successful development of differentiated support and accountability mechanisms that would benefit all students, including low-performing students, English Learners, and students with disabilities.</li> </ul>

**Principle 2 Overall Review**

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

**PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE**

*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>The success of Principle 2 is contingent on aligning the curriculum and assessments and therefore the instructional practices to the Kansas CCSS (i.e., Principle 1). In general, Principle 2 lacked a sense of urgency and coherence across all components. Furthermore, the heavy reliance on local districts to make decisions and provide technical assistance requires a very intentional strategy to build LEA capacity, which KSDE’s request is currently lacking.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• To build capacity at the state level to assist with improving student learning, KSDE is developing KIIT teams, which are based on cross-team representation including special education, ESEA programs including Title I and Title III, assessment, and school improvement. KIIT teams monitor and offer technical assistance to priority and focus schools. KIIT will be responsible for the approval of the DAP. KSDA provides a continuum of resources and services. All districts have access to information and guidance. This includes documents, tools and workshops to support districts’ use of data as well as helpful links to resources (p. 114). KSDE will use the MTSS as a systemic approach to supporting the learning of all students by helping districts and schools build a continuum of increasingly intense evidence-based interventions designed to match students’ academic and behavioral needs (p. 58).As an example of KSDE work with IHEs, the Institute for Educational Research and Public Service at the University of Kansas in cooperation with KSDE has developed a professional development opportunity for English Learner teachers. KSDE is involved in two projects to provide professional development for English Learner teachers (p. 113).</li> </ul> <p>KSDE has translated its vision for students and teachers into a system that captures a range of student outcomes:</p> <ul style="list-style-type: none"> <li>• Commitment to focus on all students equally as opposed to those primarily on the threshold of proficiency (p. 32).</li> <li>• Recognition of student demographics in rural schools by allowing for the identification of under-performing students outside of traditional ESEA subgroups.</li> <li>• Expectation that reward schools will continue to take steps necessary to ensure the implementation and sustainability of evidence-based practices and meaningful interventions to ensure students with disabilities and English Learners demonstrate progress (p. 53).</li> <li>• Recognition of the progress of advanced learners (p. 40).</li> <li>• KSDE monitors: to ensure districts are implementing federal and state programs according to the regulations; to ensure the implementation of interventions to improve student achievement; and to provide technical assistance.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Overall, it is unclear how support and assistance from KSDE will be coordinated and therefore how student achievement will be positively affected. KSDE is deferring to LEAs to implement significant portions of the SEA’s plan. However, there is a lack of detail on how LEA capacity is going to be addressed. Presently, the “capacity building” seems more heavily focused on monitoring than on actually building capacity (pp. 113-15). KSDE did not describe a process for the rigorous review and approval of any external providers used by itself and its LEAs to support the implementation of interventions in priority and focus schools.</li> <li>• There is a lack of clarity of whether KSDE intends to identify charter schools as priority schools and provide outlined supports to these schools. Charter schools need to be held accountable according to state charter law. Charter school authorizers should close low-performing charter schools (i.e., charter schools that are identified as priority schools).</li> <li>• The commitment to focus on all students equally, as opposed to those primarily on the threshold of proficiency, is commendable. However, this focus should be applied in a manner which provides safeguards against masking the achievement of low-performing students (e.g., one high-performing student earning 1000 points has the potential to mask the achievement of low-performing student.).</li> <li>• No specific information provided about the performance of subgroups over time to identify if there are issues which should be considered as the new system is developed. Also, it is unclear how easily the proposed KSDE system can be understood by teachers, parents, board members and other stakeholders.</li> <li>• It is unclear whether the state is providing professional development to content area teachers to improve the progress and performance of English Learners.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Given KSDE’s decision to defer to LEAs for many decisions related to differentiated support, significant resources should be devoted to communicating LEAs’ role and expectations in order to ensure successful development of differentiated support and accountability mechanisms that would benefit all students, including low-performing students, English Learners, and students with disabilities.</li> <li>• Given theoretical orientation and commitment to local decision making (p. 30), KSDE should provide technical assistance to LEAs to build their capacity to implement the proposed improvement strategies in a high-quality manner.</li> <li>• KSDE should share best practices identified at the LEA level.</li> <li>• KSDE should create a safeguard to ensure masking of the achievement of low-performing students is prevented.</li> </ul>

### 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: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>Guidelines for teacher and principal evaluations have been developed and are likely to be adopted by the end of 2011-12.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>The guidelines have been developed, presented to the Board (January 2012 Minutes), and are being piloted during 2011-12 in five SIG districts and 11 volunteer districts (p. 118).</li> <li>A second pilot is scheduled for 2012-13 (p. 117).</li> <li>The observation instrument rubrics have four performance values (X1, X2, X3, X4) (Kansas Educator Evaluation Protocol (KEEP) Guidelines).</li> <li>The observation rubrics are for all licensed school personnel and district leaders (p. 118).</li> <li>An electronic repository is described as being available for artifacts (p. 117).</li> <li>Professional learning plans are included as components (KEEP).</li> <li>SIG schools are involved in a pilot for 2011-12 that includes guidelines that meet ESEA flexibility requirements (p. 118), with the exception of “including as a significant factor data on student growth for all students (including English learners and students with disabilities).”</li> <li>KEEP represents a systemic methodology that links evaluation to preparation to professional learning and licensure (p. 117).</li> <li>KSDE provided a detailed timeline to implement its plans (p. 120).</li> </ul>



<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Addressing the challenges in an evaluation system that links teacher and principal performance to all students' academic growth and demonstrating workable options would be helpful for the teachers, principals, and other stakeholders.</li> <li>• How each component is valued in the final performance measure is not identified. There is no evidence that measured student growth for all students will be a significant factor.</li> <li>• It is unclear how KSDE plans to link teacher, principal, and student data and provide that information to educators to improve their practices.</li> <li>• Collective bargaining in LEAs can be a concern. Evaluation procedures must be agreed upon through the collective bargaining process (p. 118).</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should determine a method to ensure validity and reliability of measures prior to using them to make personnel decisions.</li> <li>• KSDE should develop a strategic plan to evaluate pilots.</li> <li>• Buy-in is essential for success.</li> </ul>

- 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: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>The plan reflects involvement of stakeholders that represent all students. Teachers, building leaders, and district leaders are listed as participants in the development of KEEP (pp. 164-166).</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>The KEEP stakeholders group had strong representation for all students, including urban students, rural students, English Learners, students with disabilities, and the state Parent Teachers Association (p. 118).</li> <li>The evaluation system includes teachers, building leaders, and district leaders.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>None indicated.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>KSDE should continue to implement a strategic communication strategy to inform all stakeholders about the evaluation guidelines and system (e.g., school boards, parents, teachers, and the community).</li> </ul>

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

**If the SEA selected Option B:**

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

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

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

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

*Tally of Peer Responses: X Yes, X No*

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

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: X Yes, X No*

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

**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: X Yes, X No*

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

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

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

**3.A.ii.b Panel Response**

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

*Tally of Peer Responses: X Yes, X No*

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

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

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

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

*Tally of Peer Responses: X Yes, X No*

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

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

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

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

*Tally of Peer Responses: X Yes, X No*

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	

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

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

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

*Tally of Peer Responses: X Yes, X No*

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

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: X Yes, X No*

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

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

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

**3.A.ii.e Panel Response**

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

*Tally of Peer Responses: X Yes, X No*

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

- f. Will be used to inform personnel decisions?

### 3.A.ii.f Panel Response

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

*Tally of Peer Responses: X Yes, X No*

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

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

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

- *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
- *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems?*
- *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than*



*the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*

- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE indicates that it will require that local plans meet ESEA flexibility guidelines (p. 121).</li> <li>• The plans for the processes for evaluating LEA-developed systems have not been completed (see p. 121, addendum, and phone call).</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• The evidence available through website work papers, the KEEP document, and the timeline (p. 120) provide a beginning foundation on which to build an effective evaluation and support system, but which currently do not currently meet all the criteria of ESEA flexibility.</li> <li>• Seventeen districts (including five SIG districts) signed Memoranda of Understanding (MOUs) for participation in the first pilot. A second pilot is planned for 2012-13. Work papers that detail responsibilities of SIG schools, processes, and the timeline (p. 120) are available on KSDE's website. The criteria include participation by teachers and principals in developing and using education evaluation systems (p. 118).</li> <li>• KSDE indicates that training for all pilot participants was scheduled for 2011 and will be repeated for new participants in 2012. Additional professional development is provided face-to-face, by LiveTalk, and during SIG monitoring visits (p. 119). Guidance is available on the SEA's website.</li> <li>• The timeline indicates the steps necessary for full implementation of the new evaluation systems (p. 120).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• The constructs defined in the KEEP Guidelines do not include as a significant factor the teachers’ or principals’ effect on student learning, as demonstrated through assessments.</li> <li>• “Challenges for the pilot participants include placing rubric headings to describe performance levels, selecting methodologies to determine student growth that are fair and legally defensible, categorizing constructs of practice into broad domains of practice determining the weights associated with each domain and the awards, differentiated recognition and support, which according to current laws would require local bargaining” (p. 117).</li> <li>• One work paper indicates that two KSDE staff, rather than trained peer reviewers from districts, will review the locally-developed instruments (KSDE website).</li> <li>• Implementation of systems of support, appropriate professional development opportunities, and how the KEEP and locally-designed models will be evaluated and refined is not clear.</li> <li>• No further information is available at this time as to how KSDE will ensure that every district adopts and implements an evaluation system consistent with the SEA’s adopted guidelines(Addendum).</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should consider methods to incorporate student achievement as a significant factor that meets ESEA flexibility requirements and still honors the tenet of having “the opportunity to innovate and develop locally tailored solutions to the unique educational challenges of every state, district, school and child.”</li> </ul>

### Principle 3 Overall Review

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

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

**Principle 3 Overall Review Panel Response**

*Tally of Peer Responses: 4 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE has presented a plan for educator evaluations that partially reflects the ESEA flexibility criteria. Careful attention has been given to the flexibility for districts to create models that best suit their needs, while maintaining criteria for SEA approval of the plans. The plans for processes and support systems are currently being developed (p. 121).</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE allows for consideration of a variety of artifacts in evaluation systems and indicates that a repository is available for collection (p. 117).</li> <li>• Locally-developed evaluation instruments must meet rigorous criteria and be approved (p. 118).</li> <li>• Work papers, guidance, and timelines are available on the KSDE website.</li> <li>• The importance of professional growth for teachers and principals is recognized through the required growth plans that must be consistent with identified needs (KEEP).</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• How students’ academic growth, as confirmed through assessments, plays a significant role in the evaluations is not clear.</li> <li>• While all teachers are evaluated, there is no indication of consideration for students with disabilities or English Learner teachers’ effect on student learning.</li> <li>• Local bargaining for each district in a limited timeframe may be problematic (p. 118).</li> <li>• No further information is available at this time as to how KSDE will ensure that every LEA adopts and implements an evaluation system consistent with the SEA’s adopted guidelines (p. 121).</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• KSDE should a clear description of the teacher and principal evaluation goals and how progress and the supporting benchmark will be established across one, three, and five years of implementation to create a clear plan for determining effectiveness.</li> </ul>

**Overall Request Evaluation**

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

**Overall Request Evaluation Panel Response**

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> <li>• KSDE has established a vision for each student graduating college- and career-ready, with the freedom to choose his or her life’s course. Its articulated plan for the translation of this vision into reality is commendable. However, several components of the proposal lacked the level of detail peer reviewers needed to feel confident about the SEA’s ability to roll out an overall system of differentiated recognition, accountability and intervention that will identify and support schools, administrators and educators in a manner that builds their capacity to improve outcomes for students, close the achievement gap, and improve equality of education for all students.</li> <li>• Developing a strong transitional plan to the Kansas CCSS, including the development of aligned curricular materials and assessments, is critical to KSDE’ plan to address all three principles of ESEA flexibility. The lack of a strong CCSS transition plan in KSDE’s request calls into question its ability to successfully implement the flexibility.</li> <li>• KSDE has proposed an innovative school index system to identify struggling schools which takes into account the demographics of its state and student population, and seeks to identify and provide supports to all high-needs students including those within ESEA subgroups. Peers questioned some of the technical components of the index and urge the SEA to conduct data runs to ensure its success in flagging schools with struggling student populations.</li> <li>• The SEA proposes to build on a number of its existing school accountability and improvement systems to provide support to districts and schools. It has also recognized some of the challenges involved in building appropriate capacity at the district level to ensure deep-seated systemic change that will improve educational outcomes for students. While it is important not to rush into change, KSDE must be bold in its timelines to ensure that it is addressing the needs of struggling students and schools. It will also need to continually monitor the quality of its implementation, capacity building efforts and support structures in order to successfully foster systemic and long-lasting changes.</li> <li>• The SEA’s proposed guidelines for teacher and principal evaluation systems are reasonable; however, political and technical challenges exist around the issues of fairly and comprehensively measuring schools’ and educators’ impact on student academic achievement and growth, especially in light of the proposed consequences attached to such determinations. As KSDE thinks through its transition to the CCSS, it should proactively work to ensure that new materials and processes developed through that work inform the development and rollout of its evaluation systems.</li> <li>• KSDE should move boldly to develop the details of this proposal, bearing in mind the need to create strong foundations for its work, specifically its work around the CCSS. It should develop a plan to monitor the progress of the various strands of work, as well a strategic plan to communicate on-going efforts and changes, in order to increase the level of buy-in and support for continually improving the effectiveness of its systems.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• KSDE has translated its vision for students and teachers into a system that captures a range of student outcomes, and identifies a wide-range of high-needs students, including those within ESEA subgroups.</li> <li>• KSDE has involved various stakeholders in mapping its existing standards to the CCSS.</li> <li>• KSDE is proposing a transition plan which includes a communication plan, a professional learning plan, a series of training and information workshops, and partnership with IHEs; however, details are lacking.</li> <li>• KSDE plans to build upon existing support structures and systems to provide assistance to districts, and plans to align the work of various KSDE units.</li> <li>• KSDE proposes innovative methods for providing recognition and rewards to high-performing schools and teachers, which are likely to increase opportunities for teacher leadership and professional growth.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• KSDE has not provided enough detail about the work being done to align the Kansas CCSS to curricular materials.</li> <li>• The lack of substantive detail regarding the transition plan to CCSS left some peers wondering about KSDE’s ability to transition all schools and districts to CCSS in a meaningful way.</li> <li>• KSDE’s request lacks detailed information about how KSDE plans to build the capacity of LEAs to leverage ESEA flexibility, and how it will hold LEAs accountable.</li> <li>• KSDE’s desire to provide for planning and transition time may take away from bold timelines for improvements and change.</li> <li>• KSDE has not provided a clear plan on how English Learners, students with disabilities, or low-achieving students will have equitable access to the higher standards.</li> <li>• No further information is available at this time as to how KSDE will ensure that every LEA adopts and implements an evaluation system consistent with the SEA’s adopted guidelines.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<p><i>Technical Assistance Suggestions</i></p>	<ul style="list-style-type: none"> <li>• KSDE should ensure that the strategies and initiatives within Principles 1, 2 and 3 align and work collaboratively and strategically toward the same vision. Academic growth for students is more likely to be achieved if all three principles work cohesively so that all students exit school college and career ready. Ensuring that newly designed assessments are valid for measuring student growth for the purposes of evaluation, or that the competencies that teachers need to address the needs of students with disabilities and English Learners are included within the teacher evaluation framework, can only serve to strengthen the educational framework that KSDE is proposing.</li> <li>• KSDE should implement the strategic communication plan to ensure that stakeholders, including parents and school boards, are informed of the changes made as a result of this flexibility request.</li> <li>• KSDE should develop out the specifics of its implementation and rollout timeline for the work of all three principles.</li> <li>• Given KSDE’s decision to defer decisions about differentiated support to LEAs, KSDE should provide technical assistance to districts to fully implement a process to evaluate the quality, depth, and effectiveness of professional development and ensure the fidelity of implementation.</li> <li>• KSDE should facilitate the sharing of best practices across districts.</li> <li>• KSDE should ensure that none of its differentiated accountability system components and criteria allow for the masking of student subgroup performance.</li> <li>• KSDE should ensure alignment of training and roll-out across all three principles.</li> <li>• KSDE should ensure alignment between the professional teaching and administrator standards, and the overall accountability systems to ensure that incentive and support systems for teachers and administrators align.</li> <li>• KSDE should consider the special challenges involved in measuring the academic growth of students with disabilities and English Learners, and incorporating such measures into the proposed teacher and principal frameworks.</li> <li>• KSDE should provide a clear description of all the teacher and principal evaluation goals and how progress and the supporting data and benchmarks that will be established across one, three, and five years of implementation would create a clear plan for the determining effectiveness.</li> </ul>