

# ESEA Flexibility

## Peer Panel Notes



**State Request:** Michigan

**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: 4 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Michigan Department of Education (MDE) has engaged in systematic outreach to organizations representing teachers. However, MDE has provided little evidence of meaningful, direct outreach to teachers themselves.
<i>Strengths</i>	MDE has provided documented communication with the American Federation of Teachers-Michigan, Michigan Education Association, and other professional organizations representing teachers and administrators.  In its application, MDE has demonstrated how input from teacher representatives resulted in specific changes to its request. For example, in Principle 1, teachers recommended additional resources for the dissemination of Common Core State Standards (CCSS) and stronger professional development. In Principle 2, the identified tension between “attainable” and “ambitious” goals was based on multiple conversations with teacher representatives. Similarly, in Principle 2, MDE’s safe-harbor provision and differentiated, targeted interventions were based on input from teacher representatives that the accountability model should avoid a “one-size-fits-all-approach.”
<i>Weaknesses, issues, lack of clarity</i>	MDE did not engage and solicit meaningful input from teachers outside of formal teacher representatives.
<i>Technical Assistance Suggestions</i>	Consider conducting a survey of teachers broadly, particularly with respect to Principle 3.

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>	MDE engaged and solicited input on its request from diverse communities. Additional opportunities for input from linguistically and culturally diverse stakeholders could have led to the inclusion in the request of more specific strategies to address the specific needs of these special populations throughout the proposal.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE engaged 35 diverse stakeholders. The majority of these stakeholders either attended meetings, webinars, conferences or completed a survey.</li> <li>• MDE is considering the English Learner (EL) Advisory Committee’s recommendation to join the World-Class Instructional Design and Assessment (WIDA) Consortium.</li> <li>• MDE’s public dialogue was focused on the tension between setting “ambitious” and “attainable” goals.</li> <li>• MDE sought input from stakeholders on key supports to priority schools.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Some panel members believe that, despite the recommendations from the EL Advisory Committee, there was insufficient engagement with stakeholders who represent English Learners.</li> <li>• Given the nature of the request (focusing on Title I and low-performing schools in particular), additional input from diverse stakeholders in low-performing schools (e.g., district Title I coordinators, School Improvement Grant recipients, parent groups in affected schools) might have strengthened the application.</li> </ul>
<i>Technical Assistance Suggestions</i>	As implementation support efforts roll out, consider seeking ongoing input from the EL Advisory Committee regarding all aspects of MDE’s implementation to ensure there are detailed plans to address the language and learning needs of English Learners, in particular.

## 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: 2 Yes, 4 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’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 contains some elements of a high quality plan.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• In response to panel questions, MDE has proposed a plan that contains key action items, responsible parties, and implementation dates.</li> <li>• The adoption of new cut scores demonstrates MDE’s willingness to set high standards for all students and subgroups.</li> <li>• MDE has described its collaboration with the Michigan Association of Intermediate School Administrators (MAISA) to implement several projects aimed at providing resources and supports to schools in their implementation of the CCSS including the Career and College Readiness Model project and the Connecting the Dots project, to provide teachers with focused, coherent instructional strategies that successfully implement CCSS for all students.</li> <li>• In addition to reading/language arts and mathematics, the State has graduation proficiency standards in science, social studies, and visual and performing arts.</li> <li>• The development of a college- and career-readiness core team in MDE holds promise for aligning and adequately supporting district implementation if it is supported and sustained.</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>• MDE’s plan proposes multiple, overlapping, and duplicative programs in certain areas (e.g., Science, Technology, Engineering, and Mathematics (STEM)) with little evidence of alignment and prioritization. As a result, districts and schools are likely to experience implementation support as fragmented and inconsistent.</li> <li>• The panel does not have sufficient evidence that programs proposed to support teachers are more than “light-touch” technical assistance efforts and will be more impactful than past similar interventions.</li> <li>• The plan does not contain evidence that MDE will allocate resources to support the development of interim assessments and formative tools aligned to CCSS in order to support interventions in priority and focus schools (Principle 2) as well as address the need for assessments for educator evaluations (Principle 3).</li> <li>• The plan does not describe what “college- and career-ready” means with respect to students with significant cognitive disabilities to ensure the development of instructional materials that will prepare those students to truly be college- and career-ready.</li> </ul>
<i>Technical Assistance Suggestions</i>	Evaluate the past performance and historical successes and weaknesses of past statewide efforts to provide technical assistance to ensure that new proposals move beyond “light-touch” technical assistance with multiple providers.

**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: 1 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE has presented some promising programs to ensure all students gain access to CCSS. However, the panel is concerned about the coordination and alignment of the programs, as well as evidence-based methods to improve access for students with disabilities and English learners.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• The assessment and learning needs of English Learners are addressed in detail. MDE is considering joining the WIDA Consortium that is developing assessments aligned to CCSS.</li> <li>• The multi-tiered system of support guidelines are supported by MDE’s integrated behavior and learning support initiative.</li> <li>• The MOPLS system is an online professional learning system focused on providing teachers with resources to make reading/language arts and mathematics content accessible to students with disabilities and to provide guidance on using assessments for students with disabilities and English Learners.</li> <li>• Michigan teachers of students with disabilities are required to be certified in general education.</li> <li>• Launched in 2009, the Sheltered Instruction Observation Protocol (SIOP) Train-the-Trainer model trains 20 trainers per year who, in turn, train 40-50 educators and provide follow-up coaching.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• The plan does not provide information regarding how students who participate in alternate assessments based on modified achievement standards (Michigan Educational Assessment Program-Access (MEAP-Access)) will be transitioned to the new system.</li> <li>• The plan does not describe how pre-service and in-service programs will provide general education teachers with the knowledge and skills needed to instruct students with disabilities and English Learners.</li> <li>• Insufficient information is provided regarding how assessment accommodations are aligned with classroom instruction.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Evaluate past programs aimed at closing achievement gaps and improving outcomes for students with disabilities and English Learners. Consider what worked and what did not, what evidence exists of successful programs, and how MDE can leverage past successes (or learn from past challenges).</li> <li>• Consider expanding the train-the-trainer model for greater reach if results show that the training has been effective in helping English Learners access CCSS.</li> <li>• Provide a transition plan for the instruction and assessment of students currently participating in MEAP-Access.</li> <li>• Clarify how teacher pre-service and in-service programs provide general educators with the skills necessary to teach students with disabilities and English learners.</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>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

## Principle 1 Overall Review



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

### Principle 1 Overall Review Panel Response

Tally of Peer Responses: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s plan for transitioning to and implementing college-and career-ready standards proposes several promising programs aimed at supporting teachers in classroom instruction. However, with so many programs delivered by a multitude of regional assistance providers, the panel is concerned about the alignment, coordination, and overall impact of MDE’s efforts at the school level.
<i>Strengths</i>	As noted above, there are several strengths to the plan including: <ul style="list-style-type: none"> <li>• MDE’s clear delineation of action items, which office will be responsible for implementation, and timelines for the roll-out of CCSS resources and supports.</li> <li>• MDE’s willingness to reset cut scores in order to ensure higher standards of proficiency.</li> <li>• Many of the programs described such as online professional learning system, train-the-trainer models, professional development initiatives, and pre-service teacher training requirements show promise for helping the State’s educators and students’ transition to CCSS.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	As noted above, the panel found several weaknesses in the plan including: <ul style="list-style-type: none"> <li>• Lack of evidence of MDE’s support of the development of interim assessments, formative tools, and data systems to allow teachers to monitor and target instruction.</li> <li>• Lack of overall coordination, alignment, streamlining, and prioritization of programs proposed, especially to meet the needs of students with disabilities and English learners.</li> <li>• Lack of attempts to integrate statewide initiatives across all Principles.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<p>Consider the perspective of a classroom teacher. Analyze how all supports, programs, training, tools, and initiatives described impact his or her practice, support his or her use of data and interim assessments to monitor and target students, and sufficiently hold him or accountable for delivery of CCSS.</p> <p>Think through proposed strategies to support access to CCSS for students with disabilities and English learners. Align strategies with those developed in Principles 1 and 2. Consider program evaluation and other evidence on the performance on past programs and assistance measures.</p> <p>Ensure that MDE supports the development of interim assessments and formative tools aligned to CCCS can be used to support interventions in priority and focus schools (Principle 2) as well as address the need for assessments for educator evaluations (Principle 3).</p>

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

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

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

#### 2.A.i Panel Response

*Tally of Peer Responses: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE has proposed an accountability system that meaningfully differentiates among schools and supports. Its focus on working directly with districts to build their capacity to support and intervene in their struggling schools is promising. Until there is a comprehensive, high quality plan for ensuring effective implementation of appropriate and robust improvement strategies are in place in its priority and focus schools is presented, there is weak evidence that MDE’s proposed system is likely to significantly improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE has proposed a system of differentiated recognition and accountability that relies on multiple measures and student growth.</li> <li>• Some panel members believe that MDE has thought through how to set realistic and attainable annual measurable objectives (AMOs) that are tailored to the individual needs of the school.</li> <li>• MDE has demonstrated, through its recent change in cut scores, its willingness to hold schools accountable for high levels of proficiency.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• There is insufficient evidence that the interventions, supports, and rewards described in this request will result in significant improvement in student achievement.</li> <li>• There is insufficient evidence of coordination and alignment of programs, partnerships, and service providers described.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Conduct evaluations of past professional development programs, monitoring programs, and other assistance programs related to school improvement; include feedback from district and school stakeholders as to which mechanisms of support are most useful.</li> <li>• Consider undue burden of monitoring and compliance requirements (audits, surveys, etc.) on already low-performing, low-capacity schools and districts.</li> <li>• Coordinate and align all partners, programs, and supports described.</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: 3 *Yes*, 2 *No*

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	MDE’s proposed accountability system is based on student achievement in reading/language arts, writing, science, social studies, and mathematics for all students and subgroups; graduation rates for all students and all subgroups, and school performance and progress over time, including the performance and progress of all subgroups. MDE’s system of “flags” is likely to be relatively easy for stakeholders to understand and use to assess district performance. However, panel members are concerned about the system’s potential for masking low subgroup performance and/or growth and the low weight given to graduation rates at the high school level.

<i>Response Component</i>	<i>Peer Panel Response</i>
Strengths	<ul style="list-style-type: none"> <li>• MDE’s proposed system goes above the required elements to include five tested subjects.</li> <li>• Alternate assessments exist in all subjects except for social studies.</li> <li>• MDE’s proposed accountability scorecard takes into account multiple measures of student achievement including performance progress for all subgroups.</li> <li>• The scorecard contains a system of flags to highlight areas where particular subgroups may be falling behind (or have demonstrated particularly high levels of achievement).</li> <li>• MDE has added a “Bottom 30 percent Subgroup” that represents the lowest performing students regardless of membership of an ESEA subgroup in order to hold all schools accountable for achievement gaps regardless of the size of subgroups.</li> <li>• The use of a clear, color-coded scorecard is easy for the public to understand.</li> </ul>
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> <li>• Some members of the panel are concerned that the proposed system of accountability may have the potential to mask the performance of subgroups.</li> <li>• Some members of the panel are concerned that the “weighted performance level change” factor in the proposed index may have the unintended consequence of masking a pattern of low growth for some students when their low growth is offset by high growth for others.</li> <li>• The peers are concerned about the relative low weight attributed to graduation rates in the top-to-bottom rankings (10 percent).</li> <li>• Although MDE has submitted a plan for an alternative assessment in social studies, MDE does not currently have an approved assessment.</li> <li>• Some members of the panel are concerned that a “green flag” is awarded to the “bottom 30% subgroup” when it reaches its target through “safe harbor” while other subgroups receive a “yellow flag”.</li> </ul>
Technical Assistance Suggestions	<ul style="list-style-type: none"> <li>• Provide data to demonstrate that at least as many schools would be held accountable through use of “bottom 30 percent” subgroup as would through use of traditional ESEA subgroups.</li> <li>• Run models to determine whether there are schools with low performance for specific subgroups not covered in the system and, if so, develop a mechanism to ensure the inclusion of those schools in the system.</li> <li>• Consider increasing the weight of graduation rates in the scorecard and top-to-bottom ranking.</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: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s proposed system of differentiated recognition, accountability, and support does not create sufficient incentives and provide supports that are likely to be effective in closing achievement gaps for all subgroups of students.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>As discussed above, the proposed system focuses on all five tested subjects: mathematics, reading/language arts, science, social studies, and writing.</li> <li>The “Top to Bottom” list of schools approach is based on multiple measures including: student achievement, growth over time, school improvement over time, and achievement gaps across subgroups.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>The large minimum group size (N=30) has the potential for masking gaps and low performance of subgroups.</li> <li>The proposal does not describe specific mechanisms to support and train general education teachers to meet the needs of English Learners and students with disabilities.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>Conduct program evaluation and collect data on what programs will best address achievement gaps among subgroups.</li> <li>Consider lowering the minimum group size.</li> <li>Consider expanding availability of effective supports for teachers to meet needs of English Learners and students with disabilities.</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?
- Note to Peers: Staff will review 2.A.ii.a
  - 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?
  - 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 :5 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE includes student achievement in science, social studies, and writing in its accountability system in addition to reading/language arts, and mathematics. The weighting will hold schools accountable for ensuring that all students meet MDE’s college- and career-ready standards.
<i>Strengths</i>	MDE’s decision to weight each of the five subjects equally promotes its focus on teaching and learning via standards, instruction, and assessment.
<i>Weaknesses, issues, lack of clarity</i>	MDE does not currently have an alternate assessment for social studies, but has submitted one for approval.
<i>Technical Assistance Suggestions</i>	Consider delaying inclusion of social studies in the accountability system until the alternate assessment is in use.

## 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: 4 Yes, 1 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE has proposed an AMO system that is educationally sound and results in ambitious but achievable AMOs for all districts, schools, and subgroups.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE has proposed a new AMO structure that includes individualized targets for each school based on past performance and that requires all schools to reach a statewide goal of 85 percent proficiency in ten years. Evidence provided shows how AMO targets will require ambitious rates of growth for most schools since most schools are far from the target of 85 per cent of students proficient, based on the new cut scores</li> <li>• Some panel members believe that it is a strength that all subgroups, as well as the new subgroup consisting of the lowest 30 percent of students in each school, must make their differentiated targets. All schools and their subgroups are expected to have 85 percent of their students reach proficiency within 10 years.</li> <li>• If a school fails to reach its goal, it can still receive a yellow rating by meeting a "safe harbor" criterion defined as making as much progress from year to year as the school at the 80th percentile of school improvement. Even lower-scoring subgroups must meet this level of change in order to have reached safe harbor.</li> <li>• Districts in Michigan will also receive an accountability scorecard based on their across-school results. Based on the magnitude of their student gaps, districts will receive a focus school rating. These results will be published and districts with significant gaps will be required to complete the steps required of focus schools.</li> <li>• MDE will review performance against AMOs every three years for purposes of determining AMO appropriateness.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Some members expressed concern about the bottom 30 percent subgroup potentially masking smaller subgroup differences.</li> <li>• Some panel members were concerned that specialized schools (for example, a school serving a single predominant subgroup) might be disproportionately affected by the school-based AMO system.</li> </ul>
<i>Technical Assistance Suggestions</i>	Run models to determine whether the proposed system masks subgroup differences; if it does, make necessary adjustments.

## 2.C Reward Schools

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

### 2.C.i PANEL RESPONSE

*Tally of Peer Responses: 5 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE described its methodology for identifying highest-performing and high-progress schools as reward school clearly and effectively.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE has developed a rigorous selection process for reward schools that requires meeting AMO benchmarks and four other criteria.</li> <li>• There are four different types of reward schools proposed including: 1) High Performing - schools scoring in the highest 5 percent on the index; 2) High Progress - schools performing highest on school improvement; 3) Beating the Odds - using both cluster and regression approaches; and 4) schools meeting and exceeding AMOs and rated "Green" on the scorecard. The first two types of reward schools meet the ESEA definitions. The other two do not meet the ESEA definitions. That said, the panel is supportive of MDE's efforts to recognize these schools.</li> <li>• Beating the Odds Schools are chosen through the following criteria: demographics; percentage disadvantaged; percentage English Learners; percentage students with disabilities; percentage minority; locale; size; state funding; grades. MDE is currently studying its Beating the Odd methodology to identify improvements, for next reward school run (2012-2013).</li> <li>• MDE excludes priority schools, focus schools, and schools not making AYP from consideration as reward schools.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	Consider running the models for Beating the Odds schools to ensure these schools do not have significant subgroup achievement gaps.

*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: 2 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The recognitions and rewards proposed by MDE for its reward schools are not likely to be considered meaningful by the schools.
<i>Strengths</i>	The ability to receive additional Title I flexibility for reward schools is likely to be attractive to schools since they are often frustrated by compliance and spending requirements that they find burdensome and restrictive.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• Rewards and recognitions proposed do not go far enough to meaningfully capture and disseminate successful practices from reward schools so that other schools can benefit from their successes.</li> <li>• Often, high-performing schools are based on the efforts of successful principals and teachers. The rewards described do not include meaningful professional rewards for these educators.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Consider more effective mechanisms of disseminating and scaling-up success.</li> <li>• Consider how corporate and philanthropic support could be used to reward teachers and leaders in reward schools (e.g. reduced teaching load to develop curriculum, sabbatical year to mentor other principals, etc.).</li> <li>• Consider differentiating rewards and recognition of schools based on type of reward school in order to disseminate best practices and maximize impact.</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: 3 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE will require that all priority schools complete a reform/redesign plan in accordance with one of the four school improvement models. Because each of the four models requires implementation of all elements of the Turnaround model, all priority schools will have plans that incorporate all elements. That said, not all elements are represented in the interventions described in MDE's request, so some members of the panel are not confident that all priority schools will actually implement all nine elements.
<i>Strengths</i>	All schools will implement one of the four turnaround models in their reform/redesign plan.
<i>Weaknesses, issues, lack of clarity</i>	There isn't sufficient alignment between what MDE describes as elements of its intervention model and the SIG models.
<i>Technical Assistance Suggestions</i>	None.

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

**2.D.iii.b (including questions (i)-(iii)) Panel Response***Tally of Peer Responses: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The development of a serious consequence for priority schools that fail to improve significantly should ensure a greater sense of urgency for improvement at the school and district level. Some of the interventions detailed in MDE’s request are robust strategies for school turnaround, while others are “light-touch” interventions unlikely to result in dramatic and systemic change. There is insufficient evidence provided that the interventions outlined are likely to increase the quality of instruction in priority schools, improve the effectiveness of leadership and teaching in these schools, or improve student achievement for all students.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• The creation of a school reform and redesign office within MDE will help coordinate MDE efforts and has the potential to create clear lines of authority and accountability for priority schools.</li> <li>• The development of a statewide “education achievement system” as a consequence for the lowest performing schools that fail to improve should serve to increase a sense of urgency for all stakeholders.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• MDE proposes a multitude of monitoring efforts, interventions, and supports for priority schools without a sufficiently clear description of how they will be prioritized, coordinated matched to need, or assessed; nor is there evidence that MDE has a plan to connect these items with the relevant work underway under Principle 1 and 3.</li> <li>• MDE does not provide compelling evidence (based on data, past experience, or experiences in other States), that the interventions and supports it proposes for priority school are likely to result in rapid and substantial improvement; the interventions are primarily “light-touch”.</li> <li>• There is insufficient detail regarding how the needs of English Learners and students with disabilities will be addressed.</li> <li>• The basis for the choices related to Title I set-aside requirements for priority schools is not evident: it is unclear whether MDE has evidence that, historically, using set-asides for choice-related transportation has been more effective than other strategies; it is also unclear whether MDE has evidence that, historically, any Title I statewide set-aside requirements have resulted in increases in school achievement.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Leverage lessons learned nationally and within the State about what has been effective and what not in school turnaround efforts. For example, reexamine the efficacy of external technical assistance providers such as intervention specialists who are assigned both monitoring and assistance responsibilities.</li> <li>• Provide additional information regarding how the needs of English Learners and students with disabilities will be addressed.</li> <li>• Using the six components of a high-quality plan, develop a plan that describes how monitoring, interventions, and supports will be coordinated and implemented effectively. Specifically, consider how MDE can hold itself accountable for the success of the proposed interventions.</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: 5 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Michigan’s proposed timeline will ensure that districts that have one or more priority schools will implement interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year.
<i>Strengths</i>	One or more priority schools will implement interventions aligned with the turnaround principles no later than the 2014–2015 school year.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

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

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

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

*Tally of Peer Responses: 5 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s exit criteria for priority schools incorporate leading and lagging indicators that go beyond student proficiency and adequate yearly progress (AYP) by including implementation indicators such as leadership capacity and recruitment and retention of staff.
<i>Strengths</i>	The criteria include leading indicators such as “instructional time increases” and “teacher performance using evaluation system” and implementation indicators such as “build leadership capacity” and “teacher/leader evaluation process” all of which align with turnaround principles.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Consider using the same set of leading, lagging and proficiency indicators for all school planning work so that MDE can move from a compliance-oriented school monitoring system toward a more results-focused system.</li> <li>• Require schools to use one, streamlined school improvement plan with indicators listed on page 104 as key benchmarks. Streamline all compliance and monitoring documents to include these (and only these) benchmarks.</li> <li>• Consider using some of the indicators recommended as key items in school improvement plans, desk reviews, audits and other monitoring tools to provide a streamlined, unified message to low-performing schools (e.g., inform schools of the 20 items that MDE will consistently look for across all monitoring visits).</li> <li>• Consider aligning exit criteria to the proposed instructional framework to provide a consistent message to schools.</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?
- Note to Peers: Staff will review 2.E.i.a.
  - Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

### 2.E.i.b Panel Response

*Tally of Peer Responses: 2 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Some members of the panel found MDE’s methodology for identifying focus schools educationally sound; others did not. In addition, some panel members found the methodology unlikely to ensure that schools are held accountable for the performance of subgroups.
<i>Strengths</i>	Since the scorecard will track subgroup performance, the system has a check against possible “masking” effects of combining subgroups when identifying the top and bottom 30 percent for the purpose of identifying focus schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>Some panel members believe that the system does not sufficiently hold schools accountable for subgroup performance because identification relies on combining subgroups when identifying the top and bottom 30 percent of students.</li> <li>There is little data-based evidence that the interventions proposed for schools with achievement gaps (focus schools) are sufficiently robust to close achievement gaps.</li> </ul>
<i>Technical Assistance Suggestions</i>	None.

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

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

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

### 2.E.iii Panel Response

*Tally of Peer Responses: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s process and timeline does not sufficiently ensure that each district 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. While the plan for focus schools indicates a start date of September 2012, the sequence of interventions does not indicate dates for immediate and full implementation of the designated strategies.
<i>Strengths</i>	MDE recognizes that schools succeed or fail based in part on the strength of LEA systems of support, and are taking steps to increase its capacity to intervene effectively at the district level through a district intervention team and other strategies. For example, in its addendum, MDE describes its decision to replace instructional leadership coaches who work with the school principal with intervention specialists for priority schools and district improvement facilitators who will work with districts that have focus schools. MDE described highly relevant training planned for both positions.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• The timelines are not sufficiently clear for implementation of interventions in focus schools.</li> <li>• It is unclear how the interventions for focus schools described will directly address the identified needs of each focus school given that each school will necessarily have different needs (e.g., different achievement gaps).</li> <li>• There is insufficient detail about requirements related to student with disabilities and English learners.</li> </ul>
<i>Technical Assistance Suggestions</i>	Align interventions with the specific, data-based needs of focus schools, especially for student with disabilities and English learners.

**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: 3 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Because MDE’s criteria for exit from focus status require schools to make AYP at the end of three years, and achieving AYP under new State achievement standards, the panel is confident that schools will have had to achieve substantial improvement in order to exit focus status. No exit criteria apply to the districts responsible for the focus schools. As a result, districts may lack certain systems, supports and practices that contribute to a school’s capacity to sustain improvement.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE will require focus schools to remain in focus status for three years.</li> <li>• Achieving AYP after three years represents substantial improvement given the recently-raised standards for achieving AYP.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	Without an assessment of school and district capacity for sustaining improvement as a condition for exit, it is not clear that improved performance will be sustained.
<i>Technical Assistance Suggestions</i>	Consider including some indicators of district and school capacity to sustain improvement in the exit criteria for focus schools.

## 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: 2 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s differentiated recognition, accountability, and support system provides incentives and supports for other Title I schools that, based on the its new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE will make a variety of resources and supports appropriate for school improvement available for other schools (including Title I schools) including model curriculum units and other supports designed to support implementation of CCSS (Principle 1).</li> <li>• MDE has a more intensive approach with districts that have schools not making AYP; they will be required to set aside 20 percent of their Title I funds to do at least one of three activities: implement a culture/climate intervention, complete surveys of enacted curriculum, or conduct professional learning related to content area in which the school or its subgroups did not make AYP.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• There is insufficient evidence that MDE’s plan has prioritized the variety of resources and supports available to schools or provided enough support for effective implementation at the school and classroom level.</li> <li>• Beyond its plans for reward schools, MDE’s plan contains no incentives for continuous improvement.</li> <li>• There is very little data or evidence presented on the effectiveness of the three options being prescribed for Title I schools not making AYP.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Evaluate the three options, publicize the results, and refine the options based on the evidence.</li> <li>• As an incentive for continuing improvement, consider providing for Title I schools that make AYP relief from requirements that many experience as burdensome and restrictive.</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, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Given the lack of evidence about the success of proposed strategies for supporting other Title I schools (e.g., set-asides requirements, RESA supports, monitoring supports, comprehensive needs assessments), it is difficult to determine whether the proposals will in fact increase the quality of instruction for all students including English Learners and students with disabilities.
<i>Strengths</i>	MDE has identified a wide range of tools, resources, and processes to support district and school improvement, many of which are web-based and make effective use of technology.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• There is insufficient evidence that MDE has assessed the efficacy of the many resources, tools and supports it is making available to districts and schools in order to prioritize, align, leverage, and focus resources on those tools, supports and approaches that are most likely to improve school performance.</li> <li>• MDE has not presented a comprehensive, high-quality plan for ensuring that appropriate and effective tools, resources, and supports reach classrooms in Title I schools.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Develop a plan for assessing the efficacy of the tools, resources, supports, and interventions proposed in order to prioritize strategies and align State resources with those programs that are most effective.</li> <li>• Develop a plan for ensuring that districts and schools have access to and use of the most effective and appropriate tools, resources, and strategies for school improvement. The plan should incorporate the components of a high-quality plan including key activities, benchmarks, milestones, timelines, person(s) responsible, resources and obstacles.</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: 3 Yes, 2 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	MDE's process for building State, district, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, shows promise, especially because of its recognition of the critical role districts play in the success or failure of their schools.
Strengths	<ul style="list-style-type: none"> <li>• MDE recognizes that schools succeed or fail based in part on the strength of district systems of support, and are taking steps to increase its capacity to intervene effectively at the district level through a district intervention team and other strategies. For example, in its addendum, MDE describes its decision to replace instructional leadership coaches who work with the school principal with intervention specialists for priority schools and district improvement facilitators who will work with districts that have focus schools. MDE describes highly relevant training planned for both positions.</li> <li>• In its responses to questions from the peers, MDE described the School Improvement Framework as a single common standard being used to help unify State, district and school improvement efforts. The peers believe that having one common framework is a promising step that can help districts and schools coordinate and align efforts and build capacity.</li> </ul>
Weaknesses, issues, lack of clarity	Panel members are concerned that MDE's expectation that schools annually assess their performance against the 90 indicators in its improvement framework will prove burdensome to school and district practitioners and contribute little to their efforts to focus and align their improvement efforts.
Technical Assistance Suggestions	<ul style="list-style-type: none"> <li>• Continue to clarify and refine the respective roles of the district intervention team, school support team, school intervention specialist, and district improvement specialist to ensure alignment, coherence and the most efficient use of state, district, and school staff time.</li> <li>• Examine the impact of MDE's planning and other requirements for Title I schools and their districts to minimize burden and maximize impact; consider expanding efforts to streamline reporting and documentation requirements for priority schools (as described in the addendum) to focus schools.</li> <li>• Consider adding individuals to the intervention team staff with expertise in serving 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, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s plan for developing and implementing a system of differentiated recognition, accountability, and support does not provide sufficient evidence that it will improve student achievement, close achievement gaps, and improve the quality of instruction for students.
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE has created a fair, transparent, and rigorous mechanism of differentiating and identifying schools. The system includes an easy to understand color-coded scorecard, a system of flagging achievement gaps, and a methodology that relies on multiple measures such as growth. Many of the programs, supports, and interventions, and rewards described have promise in potentially leading to increased student achievement.</li> <li>• MDE has created a differentiated approach to AMOs and rigorous, yet attainable targets for schools and subgroups.</li> <li>• Many of the programs, interventions, supports, rewards, and monitoring mechanisms described for reward, priority, and focus schools hold promise in building capacity and improving achievement.</li> <li>• MDE is taking steps to building district capacity to support and assist struggling schools.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• MDE’s plan does not contain critical elements required of a “high-quality” plan, including key milestones and activities, a detailed timeline, party or parties responsible, evidence, resources, and significant obstacles.</li> <li>• There is insufficient evidence that MDE has a clear plan to coordinate and align all of the efforts and programs described. The panel is concerned about the number of potentially overlapping, conflicting, and burdensome monitoring and support programs.</li> <li>• There is insufficient evidence that interventions and programs intended to decrease achievement gaps and improve instruction for English Learners and students with disabilities are directly targeted to data-based needs and will, in fact, result in the closing of achievement gaps and improved outcomes for English Learners and students with disabilities.</li> <li>• There is insufficient effort to provide schools and districts with increased flexibility, consolidation of planning requirements, and fewer compliance mandates to incentivize or reward schools.</li> </ul>



<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Create a simple, streamlined, and aligned plan containing key elements of a high-quality plan and including programs and supports that are based on rigorous evidence of increased student achievement and clear feedback from school stakeholders.</li> <li>• Detail how each layer of monitoring and assistance (i.e., State, regional, district, and school levels) interact and are held accountable.</li> <li>• Create a common, simple, unifying set of measures that all monitoring efforts, audits, desk-reviews and needs assessments use as key measures of school improvement. A promising model may be MDE’s proposed exit criteria for priority schools with its leading and lagging indicators.</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 Peer Response**

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

*Response: 2 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	It is not clear that MDE's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems is likely to result in successful adoption of those guidelines by the end of the 2011-2012 school year.
<i>Strengths</i>	<p>As mandated by recent legislation, the Governor's Council will craft guidelines that include required elements of a high-quality educator effectiveness evaluation system as indicated by ESEA Flexibility requirements, including that the system will:</p> <ul style="list-style-type: none"> <li>• Differentiate four performance levels (ineffective, minimally effective, effective, and highly effective),</li> <li>• Include student growth assessment data as a significant factor (25% in 2013-2014, 40% in 2014-2015, 50% in 2015-2016),</li> <li>• Require annual evaluations for all educators, including multiple classroom observations, and</li> <li>• Be used to inform personnel decisions related to promotion, retention, placement, and tenure.</li> </ul> <p>Because of previous legislation, districts are already engaged in deliberations and decisions about how to effectively assess educator impact on student growth.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>Although recent legislation mandates a Governor's Council on Educator Effectiveness to define a statewide approach to educator evaluation that is consistent with the ESEA Flexibility principles, these guidelines will not be adopted within the required timeline.</p> <p>It is MDE's intention to create interim guidelines for districts to utilize until the Council's recommendations can be</p>

<i>Response Component</i>	<i>Peer Panel Response</i>
	<p>implemented. However, MDE does not outline a clear plan for crafting the interim guidelines, nor is there sufficient information in the request to determine what will be included.</p> <p>Some panel members are concerned about the way use of student growth data increases over time under the State’s statute.</p>
<i>Technical Assistance Suggestions</i>	<p>Provide a high-quality plan indicating how MDE will craft interim guidelines by the end of the 2011-2012 school year. Include details on what the guidelines will include, as well as the elements of a high-quality plan such as timeline, key activities, etc.</p>

- 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 Peer Response

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

*Response: 2 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>MDE’s plan provides for some involvement of teachers and principals in the development of these guidelines; however, no teachers serve on the Governor’s Council for Educator Effectiveness and some elements of a high-quality plan to ensure continual engagement with educators are lacking.</p>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• Two principals serve on the Governor’s Council for Educator Effectiveness.</li> <li>• By legislative mandate, the 14-person advisory committee to the Governor’s Council must include teachers and administrators.</li> <li>• MDE plans to leverage Michigan’s Framework for Educator Effectiveness when developing interim guidelines, which was collaboratively developed by the Michigan Education Association, the American Federation of Teachers-Michigan, the Michigan Association of Secondary School Principals, and the Michigan Elementary and Middle School Principals Association.</li> <li>• MDE has hosted “best practices” conferences in April 2012 and February 2012 to gather feedback from districts, schools, and professional organizations in Michigan about promising practices, practical challenges, and the use of student growth data.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• No teachers serve on the Governor’s Council for Educator Effectiveness.</li> <li>• There is a lack of a high-quality plan to gather input and feedback directly from teachers as the Governor’s Council crafts its guidelines.</li> </ul>

<i>Response Component</i>	<i>Peer Panel Response</i>
	<ul style="list-style-type: none"> <li>It is not clear how many individual teachers were able to participate in the “best practices conferences” or how their feedback has directly resulted in the development of the guidelines.</li> </ul>
<i>Technical Assistance Suggestions</i>	Provide a high-quality plan to ensure opportunities for teachers and principals to provide input and feedback through the process of creating the guidelines. Consider methods such as surveys sent directly to teachers, focus groups, and school- and district-based listening sessions.

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 Peer Response**

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

Response: NA

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

ii. Note to Peers: Staff will review ii.

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

**3.A.i, Option B.iii Peer Response**

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

Response: NA

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

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

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

a. Will be used for continual improvement of instruction?

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

**3.A.ii.a Peer Response**

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

Response: NA

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

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

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

**3.A.ii.b Peer Response**

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

Response: NA

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

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

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

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

Response: NA

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

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

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

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

Response: NA

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

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

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

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

Response: NA

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

d. Evaluate teachers and principals on a regular basis?

**3.A.ii.d Peer Response**

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

Response: NA

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

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

**3.A.ii.e Peer Response**

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

Response: NA

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

- f. Will be used to inform personnel decisions?

**3.A.ii.f Peer Response**

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

Response: NA

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



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

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

**3.B Peer Response***Response: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>Already, districts are engaged in deliberations to implement evaluation systems that take into account student growth as a significant part of annual educator evaluation. MDE is taking advantage of local efforts to identify, support, and share best practices and lessons learned with educators in the field and members of the Governor’s Council. Similarly, MDE is collaborating with selected districts and regional entities to pilot approaches and develop resources that will inform and support effective implementation.</p> <p>However, MDE’s plan included in the request does not detail important elements such as key milestones, timelines, person(s) responsible, etc., which concerns the panel in regards to MDE’s ability to implement the system in accordance with the Principle. Further, current Michigan law does not include a pilot year for the system.</p>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE sees strong legislation as essential but not sufficient to ensure compliance and effective implementation; as a result, they are engaged in a number of promising pilot activities with various districts and regional education agencies that should result in useful resources that MDE can make available statewide, e.g., a validation study of one district’s use of student, parent, and teacher surveys from MET project, exploration of value-added models using one district’s three years of linked student-teacher data, development of a model observation protocol and standards.</li> <li>• Once the legislatively mandated Governor’s Council on Educator Effectiveness completes its deliberations and makes its recommendations to the governor and legislature, additional legislation is expected that will mandate implementation statewide (with the requirement that every district adopt the state system or propose a high-quality alternative for MDE approval).</li> <li>• MDE plans to use “light-of-day” reporting to encourage compliance, including cross-referencing district reports of educator effectiveness labels with available state student assessment data and the teacher-student data link to identify discrepancy trends.</li> <li>• Because of previous legislation, districts are already engaged in deliberations and decisions about how to create and implement educator evaluation systems.</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 not clear that MDE’s plan for developing and adopting guidelines for local teacher and principal evaluation and support systems is likely to result in successful adoption of those guidelines by the end of the 2011-2012 school year.</li> <li>• Current law does not mandate a pilot year once the Governor’s Council makes its recommendations, which is required by ESEA Flexibility.</li> <li>• Current law does not give MDE any specific authority for compliance monitoring to ensure districts are appropriately developing and implementing evaluation systems that meet the guidelines of both State statute and ESEA Flexibility.</li> <li>• The request includes no specific plan with key milestones, timelines, or responsible parties for accomplishing what is described in this section, which raises concerns about MDE’s capacity to implement a system in accordance with the Principle.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Seek legislative authorization of a pilot year once the Governor’s Council recommendation have been made and accepted.</li> <li>• Seek legislative authority for compliance monitoring to ensure districts create and implement high-quality educator effectiveness evaluation systems.</li> <li>• Provide a high-quality plan with key milestones, timeline, etc.</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 Peer Response

*Response: 0 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>Without a high-quality plan with milestones, timeline, person(s) responsible, etc., it is not possible to have confidence that the many appropriate activities described in the request will be completed in the sequence needed or with the connections to other activities needed to fully meet this requirement.</p> <p>That said, there is much to applaud in Michigan’s request, including:</p> <ul style="list-style-type: none"> <li>• a strong statutory basis,</li> <li>• the “head start” that local districts have in devising ways to make student growth a central part of the educator evaluation process,</li> <li>• MDE’s determination to support and learn from the work underway at the local level, and</li> <li>• MDE’s clear understanding that it will take much more than a legislative mandate to ensure effective implementation in every Michigan school.</li> </ul>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• There is a strong statutory basis for developing guidelines for and implementing local teacher and principal evaluation and support systems.</li> <li>• Because of previous legislation, local districts are already engaged in deliberations and decisions about how to create and implement educator evaluation systems.</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>• Current legislation does not mandate a pilot year once the Governor’s Council makes its recommendations, which is required by ESEA Flexibility.</li> <li>• Current legislation does not give MDE any specific authority for compliance monitoring to ensure districts are appropriately developing and implementing evaluation systems that meet the guidelines of both state statute and ESEA Flexibility.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Develop a high-quality plan with milestones, timelines, person(s) responsible, evidence and resources, etc, for ensuring SEA and district development and implementation of a meaningful educator effectiveness evaluation and support system.</li> <li>• Seek legislative authority for mandating a pilot year and for monitoring local district compliance.</li> <li>• Ensure opportunities for teachers and principals to provide input and feedback through the process of creating the guidelines. Consider methods such as surveys sent directly to teachers, focus groups, and school- and district-based listening sessions.</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 Peer Response

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDE’s plan for transitioning to and implementing college- and career-ready standard proposes several promising programs aimed at supporting teachers in classroom instruction. However, with so many programs delivered by a multitude of regional assistance providers, the panel is concerned about the alignment, coordination, and overall impact of MDE’s impact at the school and classroom level. MDE’s proposal for developing and implementing a system of differentiated recognition, accountability, and support does not provide sufficient evidence that it will improve student achievement or close achievement gaps. There is a strong statutory basis for developing educator evaluation systems; however, the plan needs more detail and lacks a pilot.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> <li>• MDE has set the stage for effective CCSS implementation by resetting cut scores in order to ensure higher standards for proficiency.</li> <li>• MDE has created a differentiated approach to AMOs and rigorous, yet attainable targets for schools and subgroups.</li> <li>• MDE’s recognition that schools succeed or fail based in part on the strength of district systems of support has resulted in actions to increase its capacity to assist and intervene effectively at the district level.</li> <li>• There is a strong statutory basis for developing guidelines for and implementing local principal and teacher evaluation and support systems.</li> </ul>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> <li>• MDE provides insufficient evidence of overall coordination, alignment, streamlining and prioritization of programs proposed, especially to meet the needs of students with disabilities and English Learners.</li> <li>• MDE’s request does not contain critical elements of a high-quality plan for effective implementation.</li> <li>• MDE’s school intervention plan relies on too many light-touch strategies.</li> <li>• Current legislation does not meet mandated pilot year requirements, nor does it give MDE specific authority for compliance monitoring.</li> </ul>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> <li>• Create a comprehensive plan with all elements of a high-quality plan focused on effective delivery and support at the district and school staff.</li> <li>• Think through proposed strategies to support access to CCSS for students with disabilities and English learners; align these strategies with those to be developed for Principles 2 and 3.</li> <li>• Detail how each layer of monitoring and assistance will be coordinated and aligned at the State, district, and school level.</li> </ul>