

ESEA Flexibility

Peer Panel Notes



State Request: Missouri

Date: March 29, 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: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The Missouri Department of Elementary and Secondary Education (MDESE) solicited input from its teacher and their representatives; however, it is not apparent that MDESE used this feedback to modify its request.
<i>Strengths</i>	<ul style="list-style-type: none"> • MDESE established a No Child Left Behind Flexibility Waiver webpage dedicated to the work of preparing its flexibility request. All four drafts created prior to submission were posted on this webpage and educators, parents and stakeholders across the state were invited to review and provide input. This webpage also provided a unique e-mail address through which the public could submit comments and feedback (p. 10). • A series of webinars were hosted to provide detailed information. A side-by-side comparison chart detail the specific changes that would occur as a result of the waiver. A frequently asked questions document addressed specific issues. New releases were sent to all school administrators. Copies of electronic newsletters were sent to over 60,000 subscribers (p. 11). • Regional meetings were conducted by the Executive Leadership Team. The Regional Advisory Committee members included teachers, higher education representatives, business leaders, parents, and education leadership personnel (p. 10, Att. A, website: dese.mo.gov/qs/MSIP5.html). • MDESE posted a list of meetings from around the state from October 2011 through January 2012, which included a joint teacher-organization meeting including the American Federation of Teachers (AFT), Missouri National Education Association, and Missouri State Teachers Association (Att. A, website: dese.mo.gov/qs/MSIP5.html).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The State educational agency (SEA) did not provide evidence that it reached out to teachers of English as a second language (TESOL) or other English Learners' professional groups. • The SEA did not demonstrate meaningful revisions to its request based on the input of educators. The additional description of feedback provided in the addendum MDESE submitted on March 12, 2012 was not substantive as it related to the principles of the flexibility request.
<i>Technical Assistance Suggestions</i>	None.

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • MDESE solicited input on its request from some communities. However, the input MDESE solicited on its request did not significantly impact the revisions to the flexibility request.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • MDESE established a No Child Left Behind Flexibility Waiver webpage dedicated to the work of preparing this request. All four drafts created prior to submission were posted on this webpage and educators, parents and stakeholders across the state were invited to review and provide input. This webpage also provided a unique e-mail address through which the public could submit comments and feedback (p. 10). • A series of webinars were hosted to provide detailed information. A side-by-side comparison chart detailed the specific changes that would occur as a result of the waiver. A frequently asked questions document addressed specific issues. New releases were sent to all school administrators. Copies of electronic newsletters were sent to over 60,000 subscribers (p. 11). • Regional meetings were conducted by the Executive Leadership Team. The Regional Advisory Committee members included teachers, higher education representatives, business leaders, parents, and education leadership personnel (p. 10, website: dese.mo.gov/qs/MSIP5.html). • MDESE provided a list of informational meetings from around the state from October 2011 through January 2012, which included legislative representatives, civic associations, Black leaders, and business councils (Att. A, website: dese.mo.gov/qs/MSIP5.html).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There were no specific references to representatives of English Learners. • While the SEA conducted informational meetings with a variety of stakeholder organizations, the SEA did not demonstrate meaningful revisions based on the feedback from the stakeholders with whom it consulted.
<i>Technical Assistance Suggestions</i>	None.

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

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B Transition to college- and career-ready standards

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

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE’s plan to transition and implement the college- and career-ready standards statewide in at least English/language arts (ELA) and mathematics no later than the 2013–2014 school year is realistic and of high quality.
<i>Strengths</i>	<ul style="list-style-type: none"> • Missouri educators actively participated in the development and review of all draft versions of the Common Core State Standards (CCSS), providing feedback and conferencing with CCSS development staff along the way. Upon release of the final draft of the standards for public comment, there were 272 Missouri feedback submissions, of which 53 percent were from K–12 teachers (p. 17). • MDESE has conducted an alignment analysis resulting in two documents: (1) a “crosswalk” indicating the presence or absence of alignment and (2) a “similarities and differences” document for ELA and mathematics (p. 18). • MDESE has included career and technical education (CTE) teachers in the implementation of the CCSS and has created a formal collaboration with core academic teachers (p. 18). • MDESE content specialists conducted eight regional sessions regarding the CCSS implementation (p. 23). • MDESE developed professional development modules and resources which can be accessed at its CCSS website (p. 24). MDESE provided a table of standards’ resources available by primary audience, resource content, and grade level (p. 27). • MDESE provided its information dissemination timeline for CCSS implementation, including key activities and milestones as well as responsible parties (p. 23). • MDESE has provided information sessions focusing on the roles of principals and district leaders with respect to the CCSS as well as to administrator organizations (pp. 25-26). • MDESE has partnered with the State’s institutions of higher education (IHEs) and provided a table of their major collaborative projects (p. 28). • The Missouri Association of Colleges of Teacher Education worked closely with MDESE’s Office of Educator Quality in the development of — and preparation of implementation for — the new leader standards. As part of the professional development plan for leaders during the summer of 2012, college- and career-ready standards content and implementation will be an integral part of the leader training. MDESE is also working with its IHEs on a process to improve the preparation of incoming teachers (p. 29). • Missouri created a model curriculum for schools in collaboration with K-12 and college faculty. (p. 28)

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Although the SEA discusses the development of the English language proficiency (ELP) standards, it does not discuss the alignment to the CCSS, especially with respect to college readiness.
<i>Technical Assistance Suggestions</i>	None.

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

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

1.B Panel Response, Part B

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> MDESE did not provide sufficient details on how its plan would likely lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the CCSS.
<i>Strengths</i>	<ul style="list-style-type: none"> MDESE has adopted the World-Class Instructional Design and Assessment (WIDA) ELP standards. MDESE referenced a study that showed that the language functions and example topics in the 2007 WIDA ELP standards strongly associate with the content expectations of the CCSS in ELA and mathematics (p. 19). The two MDESE English Learner consultants in regional centers have either completed training to be a certified WIDA instructor or are in the process of doing so. Beginning in May 2012 (after the release of new ELP standards and completed training), the state will be offering professional development sessions to districts (p. 26). Key instructional specialists in each of the regions will meet monthly with MDESE staff for curriculum updates and the development of professional development modules and materials. Those specialists will include core academic educators, English Learner specialists, and one special education consultant (p. 22). On page 22, MDESE indicated that it has special education and general content teachers that are working together to develop modules and professional development materials to address how students with disabilities will access the CCSS.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While MDESE has ACCESS data, it does not appear to be used to inform the alignment of the ELP standards with the CCSS. • MDESE did not provide sufficient information on how it will address transition to the CCSS in terms of professional development for all teachers, development of instructional materials, and provision of resources for English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	None.

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

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

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

If the SEA selected Option B:

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

1.C, Option B Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A

<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • MDESE’s plan for transitioning to and implementing the CCSS was comprehensive and coherent and will likely increase the quality of instruction for students. More details, however, should be provided on how MDESE will address the needs of English Learners and students with disabilities in terms of transitioning to and implementing college- and career-ready standards.
<i>Strengths</i>	<ul style="list-style-type: none"> • MDESE’s timelines, professional development activities, development of resources, and involvement of stakeholders and IHEs were strengths. • MDESE has created detailed crosswalks from its current standards to the CCSS. In addition, MDESE has identified core weaknesses in the writing curriculum and developed professional development plans to address them (p. 18). • MDESE has created model curricula beginning with mathematics, ELA, and social studies to address the CCSS. MDESE has special education and general content teachers that are working together to develop modules and professional development materials to address how students with disabilities will access the CCSS (p. 22). • The inclusion of CTE teachers in the alignment process to the CCSS resulted in more realistic instructional lessons for more teachers to use.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The request lacks details on how MDESE will address the needs of English Learners and students with disabilities in terms of transitioning to and implementing college-and career-ready standards. In particular, there is insufficient attention to the core content teachers with respect to addressing the needs of English Learners and students with disabilities.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	MDESE should provide more details on how it will address the needs of English Learners and students with disabilities in terms of transitioning to and implementing CCSS, particularly with respect to how teachers of core content can address the needs of English Learners and students with disabilities.

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

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

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

2.A.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide sufficient detail describing the planned accountability system to demonstrate that it is likely to 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"> MDESE’s plan includes using both status and progress in achievement and graduation rates to identify reward, priority, and focus schools.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE’s method of calculating its Core Score, which is used to identify reward, focus, and priority schools, is not clear, logical, or coherent, nor, in the view of the peers, is it likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students. • Interventions are not specific and are not delineated, especially for Title I schools that are not priority or focus schools. • Identification of students with low achievement in subgroups may be masked by the use of a single subgroup of historically low-achieving students. • MDESE’s Core Score is compensatory and may not identify low achievement in certain subjects. • The peers are concerned that the MAP [Missouri Assessment Program] Performance Index (MPI) target is not sufficiently rigorous. Additionally, the peers are concerned that the system does not focus on the lowest-performing schools.
<i>Technical Assistance Suggestions</i>	See technical assistance under Principle 2 Overall.

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

2.A.i.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The peers see numerous weaknesses in the MDESE’s accountability system. The compensatory nature of the system does not allow the SEA to hold LEAs accountable for student achievement in ELA and mathematics for all students and all subgroups. These deficiencies are detailed in the Weaknesses section below.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none">• While the Student Gap Group will be used to make school determinations, MDESE will continue to issue and report performance against annual measurable objectives (AMOs) for students in the aggregate, low-income students, students with disabilities, English Learners, and the State’s major racial and ethnic subgroups (p. 34).

<i>Response Component</i>	<i>Peer Panel Response</i>
<p><i>Weaknesses, issues, lack of clarity</i></p>	<ul style="list-style-type: none"> • The central component of the proposed accountability model is a Core Score as described on page 38 that will be used to differentiate schools for interventions. There are multiple weaknesses associated with how that Core Score is conceptualized. • MDESE’s method to identify reward, priority, and focus schools is not clear. The peers identified several issues with the calculations used for determination of schools for rewards or interventions: • The numeric values assigned to the achievement scores in the MPI contributes to the compensatory nature of the index because it weights the highest performing students more than the lower achieving students. As proposed, the peers do not believe that this system will help Missouri close its achievement gaps and lead all students to be college- and career-ready. • The system is further compensatory because it combines scores for the two content areas and all subgroups and then averages this over three years. It is unclear what information schools will have in terms of addressing the needs of the individual subgroups and schools. • A Baseline MPI of 450 does not necessarily set a standard of college and career –readiness. Without being able to see MDESE’s data for establishing 450 as the target the peers are unable to determine if this is in fact a rigorous goal. • The scoring system to generate the Core Score is unclear and the compensatory nature of it may mask low-performing subject areas or subgroups. This is compensatory because a school can receive the progress points in its Core Score without closing gaps and a school can receive the highest number of points by just meeting the status score without showing progress. This is further complicated by the fact that the SEA indicated in its phone call with the peers on March 29, 2012 that the assignment of points may change. • MDESE’s request notes that both four- and five-year graduation rates will be calculated. Using both cohorts to determine if a school has met the graduation rate target does not encourage excellence. Additionally, the awarding of points for student with disabilities who graduate up to age 21 may not encourage earlier graduation. On the phone call with the peers on March 29, 2012, the SEA indicated that the targets for graduation rate were not included in the request (p. 46). • Differentiated support for Title I schools was not specific. • The AMOs as reported will not be used to identify subgroup needs in terms of achievement or graduation rate. • Because the maximum score for each element in the Core Score equals the status score, schools that score the maximum score in status do not need to show progress (p. 47).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • See technical assistance under Principle 2 Overall.

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

2.A.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The method the SEA proposed does not create incentives for LEAs to specifically focus on subgroup growth nor will it result in sufficient data to identify the needs of students in particular subgroups.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA’s accountability system could have the effect of including more schools, particularly those with students in low-achieving subgroups below the state’s minimum “n-size,” in the SEA’s accountability system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Identification of the Student Gap Group may mask needs of individual subgroups. • The Student Gap Group contains students who may not be low-performing, which is clearly a compensatory model. • Interventions for closing the achievement gaps were not described. • It is not clear how the graduation rate score will be used for subgroups.
<i>Technical Assistance Suggestions</i>	See technical assistance under Principle 2 Overall.

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

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

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

2.A.ii Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated

recognition, accountability, and support system and to identify reward, priority, and focus schools?

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

2.A.ii.b PANEL RESPONSE

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

Tally of Peer Responses: NA

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

2.B Set Ambitious but Achievable Annual Measurable Objectives

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

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

If the SEA selected Option C:

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

- i. Did the SEA provide the new AMOs and the method used to set these AMOs?

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide sufficient detail to describe the AMOs, how they are calculated, and how they will be used to result in a significant number of children being on track to be college and career ready. It is not clear that MDESE’s AMOs are similarly ambitious to the AMOs that would result from using Option A or B (p. 46).
<i>Strengths</i>	<ul style="list-style-type: none"> • MDESE is establishing a status target that is based on cutting the achievement gap in half (p. 46).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE will use the Core Score to distinguish schools and LEAs in levels under the framework for accountability and assistance, while AMOs will serve as transparent reporting measures that inform the public and other stakeholders of the progress schools and districts are making toward college and career readiness for all students (p. 38). Reporting alone does not assure students will be on track to be college and career ready. • It is not clear how progress, status, and graduation rates will be used in the AMOs. • It is not clear that the AMOs MDESE has established under Option C are similarly ambitious to the AMOs that would result from using Option A or B above. • It is not clear that the AMOs are ambitious but achievable given the State’s existing proficiency rates and any other relevant circumstances in the State. The SEA did not provide data on statewide proficiency and information about how the AMOs would impact schools. • It is not clear how scores will be generated to determine if schools meet the established AMOs. • The peers are concerned about the use of including an advanced score in the AMOs because it may mask the performance of low-achieving students. • A school can receive maximum progress points without closing the achievement gaps that exist in that school.
<i>Technical Assistance Suggestions</i>	See technical assistance under Principle 2 Overall.

2.C Reward Schools

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

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA detailed its methodology for identifying reward schools, but the peers are concerned about the underlying validity of the model for calculating the MPI that is used to identify reward schools. The MPI is overly complex and not transparent. As a result, peers do not believe that it will lead to the identifying the correct schools.

<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA makes clear that a highest-performing reward school needs to be in the top 10% of achievement on the MPI and that a high-progress reward school needs to demonstrate at least a 5% increase based on the MPI. • The SEA details the steps that it will use to identify reward schools and provides the criteria.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Schools with any grade-level risk factors are ineligible to be reward schools. The SEA did not define “grade-level risk factors.” Following the telephone call, it remains unclear how the risk factors will factor in to the selection of reward schools. • The MPI is overly complex and not transparent, which results in the peers being concerned that the reward schools may not be the top performing schools.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide sufficient detail regarding the recognition that reward schools will receive for the peers to determine if reward school status will serve as an effective incentive (p.49).
<i>Strengths</i>	None.

<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE did not indicate how it consulted with LEAs in designing recognition for reward schools. • MDESE proposes that reward schools will be flagged in State reports, will serve as models, and receive public recognition. However, it is not clear what recognition reward schools will receive. • The SEA noted that educators from high-progress schools will “welcome the opportunity to share their lessons with others.” However, it did not describe any mechanism to disseminate lessons..
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide sufficient detail about its interventions to assure that the interventions are likely to result in dramatic, systemic change in priority schools.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Though MDESE noted that priority schools would be required to implement principles required of a turnaround school and listed some of these (pp. 51-52), MDESE did not detail the activities, timelines, persons responsible, and specific monitoring and support it will provide. • Though MDESE noted that the Statewide System of Support (SSOS) will conduct site visits, the nature of these site visits was general and did not specify interventions according to the needs of the schools (p. 52). • MDESE did not provide any information on interventions for specific students such as English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

- b. Are the identified interventions to be implemented in priority schools likely to —
 - increase the quality of instruction in priority schools;
 - improve the effectiveness of the leadership and the teaching in these schools; and
 - improve student achievement and, where applicable, graduation rates for all students, including English Learners, students

with disabilities, and the lowest-achieving students?

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide enough detail explaining the interventions for priority schools to assure that they meet the requirements that that they will increase the quality of instruction, improve the effectiveness of the leadership and teaching, and improve student achievement.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Though MDESE noted that priority schools would be required to implement principles required of a turnaround school and listed some of these (pp. 51-52), MDESE did not detail the activities, timelines, people responsible, and specific monitoring and support it will provide. • Though MDESE noted that the SSOS will conduct site visits, the nature of these site visits was general and did not specify interventions according to the needs of the schools (p. 52). • MDESE did not provide any information on interventions for specific students such as English Learners and students with disabilities. • Interventions for low-graduation rates were not described.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

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

2.D.iv Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
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<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Though MDESE noted that interventions in priority schools would be implemented by 2014-15 (p. 53), there was not sufficient information to determine that these interventions would be meaningful. In additional documentation submitted, MDESE noted that their expectation is that priority schools will be identified during the 2012-13 school year, to begin implementation of turnaround or transformation intervention models in 2012-13
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Though MDESE noted that priority schools would be required to implement principles required of a turnaround school and listed some of these (pp. 51-52), MDESE did not detail the activities, timelines, persons responsible, and specific monitoring and support it will provide. • Though MDESE noted that the SSOS will conduct site visits, the nature of these site visits was general and did not specify interventions according to the needs of the schools(p. 52). • MDESE did not provide any information on interventions for specific students such as English Learners and students with disabilities. • Interventions for schools with low-graduation rates were not provided.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Although MDESE provided its exit criteria, the peers are concerned about the rigor of the criteria and the sustainability of the improvement.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Schools would exit from priority school status when the school no longer meets the definition of a priority school for three consecutive years and has reduced the number of non-proficient students by 25% over a period of three years.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The peers are concerned with whether the exit criteria are sufficiently rigorous. • The underlying methodology for determining whether a school meets priority school criteria may be flawed. • The lack of detail regarding the interventions to be used in these schools does not ensure that improvement will be sustainable.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

2.E Focus Schools

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

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

- a. Note to Peers: Staff will review 2.E.i.a.
- b. Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE’s methodology for identifying focus schools is not clear.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The method of identifying focus schools is not clear (p. 54). It appears that the status measure for subgroups will be used to identify focus schools, but “risk factors” are not defined. Following the telephone call with MDESE it remains unclear the impact that the risk factors will have on the selection of focus schools. • It appears that the SEA is trying to identify schools with the biggest achievement gaps, but portions of the calculation are not articulated including the risk factors, the “Missing List,” the use of “n size,” and the use of graduation rate (see Table 23, p. 54).
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

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

2.E.iii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide sufficient detail on the interventions for focus schools to assure that they would be effective.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Focus schools will be required to submit an accountability plan that has been developed in collaboration with the SSOS. • The SEA indicated in its Addendum that it will begin implementation of interventions in 2012-2013.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE listed interventions that the schools would need to implement with the assistance of the SSOS, however, the list was broad, general, and not specific enough to make any determination if these interventions would be appropriate for the need of the focus schools (p. 55). • MDESE did not provide any information on interventions for specific students such as English Learners, students with disabilities and increasing graduation rates, even though they note that subgroup gaps are used in the identification of focus schools.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

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

2.E.iv and 2.E.iv.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The criteria for exiting focus school status is not clearly defined and it is not apparent that it will result in narrowing achievement gaps among the subgroups. It is also not clear that it will result in reducing subgroup graduation gaps.
<i>Strengths</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Though MDESE indicated that a school must decrease the number of non-proficient student by 25% over a period of three years, it is not clear on which assessment or assessments. A 25% decrease in non-proficient students does not necessarily indicate that the school has closed any gaps. • The SEA's requirement that subgroup graduation rate must exceed the State average graduation rate for three consecutive years may not be rigorous, given the absence of data.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

2.F.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE's response to providing supports to other Title I schools was not specific and provided no details of the interventions/supports that would be conducted as a result of their monitoring of achievement data and AMOs in Title I schools.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE's general statement about the support to other Title I schools that are not priority or focus schools did not specify what interventions would be conducted as a result of their monitoring of student achievement data. • MDESE did not specify how they would use the new AMOs to determine interventions. • MDESE did not address how they would provide interventions to narrow achievement gaps.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

2.F.ii Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE did not provide specific interventions and supports, therefore peers are unable to evaluate if the incentives and supports will result in closing achievement gaps and increasing the quality of instruction for all students.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • MDESE’s response did not specify types of incentives and supports to be provided to other Title I schools that are not identified as priority or focus schools. • MDESE did not address how they would specifically intervene and provide supports to close achievement gaps. • MDESE did not address the interventions and supports for English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 2 Overall.

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

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

- iii. Is the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G (including i, ii, and iii) Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	MDESE did not provide sufficient detail to their 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, to show that it is likely to succeed in improving such capacity.
Strengths	None.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • MDESE did not describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions (p. 57). • MDESE did not address how it would leverage funds to build capacity that 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. • MDESE did not provide sufficient detail describing its plan to hold LEAs accountable for improving school and student performance, particularly for turning around their priority schools. MDESE’s request did not demonstrate that LEA capacity to support school improvement would be improved.
Technical Assistance Suggestions	See technical assistance suggestions in the Principle 2 Overall.

Principle 2 Overall Review

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

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
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<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The peers believe that MDESE’s Principle 2 is fundamentally inadequate to create a comprehensive and coherent accountability system. In addition MDESE did not provide sufficient detail regarding the planned intervention and support system to show that it is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The school rating system, the accountability model beginning with the Core Score, and the AMOs are based on structurally unsound methodology and logic. • MDESE’s methods to identify, support, and exit focus and priority schools were not clear. Several questions arise in terms of the calculations and determination of schools for reward schools. • MDESE did not address specific interventions for English Learners and students with disabilities or how they would address gaps in achievement in general. • MDESE plan to increase graduation rates in terms of identification and interventions was not clear.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA may want to convene a workgroup that includes outside experts to reexamine the conceptual framework for their achievement methodology and hence the accountability system. The SEA needs to create an accountability system that is not compensatory and that identifies subgroup gaps, graduation deficiencies, and achievement in reading and mathematics for all students and all schools throughout the State. • The SEA should provide specificity on interventions that support the closing of subgroup achievement gaps and supports to all Title I schools by using its available data sources and multiple reports to look at the gaps of students who are not achieving proficiency, then use the research to determine the interventions most effective at closing the achievement gaps, and maximize its consortia and collaborations. • The SEA should provide specific interventions/supports for subgroup gaps and in particular English Learners and students with disabilities.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A**:

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

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

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

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

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The extensive collaboration around the Model Standards and the Model Evaluation System, the grounding of the evaluation system in contemporary research, and progress made so far should result in a successful adoption of the guidelines by the end of 2011-12.
<i>Strengths</i>	<ul style="list-style-type: none"> • The timeline in the application supports the adoption of the guidelines by the State Board in June of 2012. • MDESE adopted the Model Teacher and Leader Standards in June 2011 using a very collaborative process involving teachers and their representatives, higher education faculty, and the standing Missouri Advisory Council of Certification for Educators (MACCE) (p. 60). • The application provides an explanation of the theory of action, organization and framework of the instructional standards. This process seems to be thorough and based in contemporary research on improving instructional practice. • The rubrics may assist in commitment to a continuum of practice from teacher preparation through on the job performance. • The MES components include specific requirements for content and district implementation in key areas of research based practices, differentiated performance levels, instructional practice performance targets, student performance, feedback on performance, and evaluator training. • MDESE is conducting a second pilot project called the Student Growth Pilot Project which focuses on student growth percentile and value-added measures. There are 156 pilot districts participating. The outcome of this project will inform the student performance measures component of the state’s educator evaluation system (p. 66).

<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • An articulation of the alignment between performance during the 5-year probationary period and the rubric for first and early career teachers is not addressed. • It is not clear what specific outcomes will be produced (even after reviewing the documents on the web site) from the student growth pilot project (<i>i.e.</i>, recommendations to further explore Value Added Modeling (VAM) and Student Growth Percentile (SGP), use one/both, select a calculation for one/both).
<i>Technical Assistance Suggestions</i>	None.

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

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

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

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The processes for establishing the Teacher and Leader Standards and the Model Evaluation System are inclusive of teachers, teacher representatives and teacher educators from higher education institutions.
<i>Strengths</i>	<ul style="list-style-type: none"> • The processes for inclusion of teachers, teacher representatives and teacher education representatives in the development of Standards and several components of Model Evaluation System are well documented in the request. • The information for the student growth pilot project is accessible on the web site, appears to be geared toward helping inform teachers and includes an FAQ document and presentations on VAM and SGP.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is not clear how much of the guidelines adopted by the Board will encompass the state model evaluation system.
<i>Technical Assistance Suggestions</i>	None.

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

If the SEA selected **Option B:**

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

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

Tally of Peer Responses: NA

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

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

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

a. Will be used for continual improvement of instruction ?

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

3.A.ii.a Panel Response

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

Tally of Peer Responses: NA

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

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

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

3.A.ii.b Panel Response

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A

<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

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

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

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

Tally of Peer Responses: NA

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

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	N/A

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

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

3.A.ii.e Panel Response

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

Tally of Peer Responses: NA

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

- f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

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

Tally of Peer Responses: NA

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

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

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

- *Does the SEA have a process for reviewing and approving an LEA’s teacher and principal evaluation and support systems to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA’s evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
- *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA’s teacher and principal evaluation and support systems?*
- *Is the SEA’s plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems*

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

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

3.B Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE proposed a plan that will ensure that its LEA develop, adopt, pilot, and implement, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA’s adopted guidelines that is likely to lead to high-quality local teacher and principal evaluation and support systems.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • <u>Ensuring teacher and principal involvement.</u> This portion of the development of...is well documented and is supported by the field test and pilot. • <u>Ensuring valid and reliable measures of performance.</u> MDESE’s state assessments and involvement in the national assessment consortium support this. MDESE appears open to exploring multiple measures to document student performance and indicates they are reviewing both VAM and SGP for calculating student growth. The instructional practice portion of the evaluation is based on contemporary research in improving student performance. A training plan for evaluators should assist in consistent implementation of systems in each LEA. • <u>Ensuring special population teachers are included in LEA support.</u> The request states that MDESE’s quality indicators will assist all teachers, including those of students in special populations, such as students with disabilities and English Learners, based on their relationship to the Teacher and Leader Standards. The state indicates that the specific supports for priority and focus schools will include implementation of the new evaluation system. • <u>Timeline meets waiver dates and reflects logical sequencing.</u> The timeline reflects piloting in 2012-13 and “adoption of or alignment to state system in 2013-14.” This appears to indicate full implementation in 2014-15. • <u>SEA guidance and support to LEAs for development and implementation.</u> Guidance and technical assistance include face-to-face sessions, specific support for LEAs that will adopt the state model and those that will not, as well as specific assistance for priority and focus School implementation after the adoption phase. The request includes development of a statewide strategic communication plan and analysis of LEA resource capacity to implement the evaluation system (pp. 69-70). • <u>Effective piloting.</u> The current field test includes 173 schools (33%). The application describes the pilot as larger than the field test. While not much detail is included in how large, over 173 schools should provide adequate feedback on implementation issues, provided that the diversity of LEAs, teacher and students is well represented in the pilot. • Based on the phone conversation with the SEA on March 29, 2012, the SEA indicated that new regulations may be put in place, pending Board approval, to ensure that LEAs use evaluation data in making human capital decisions. Additionally, the regulations would grant the SEA authority to approve LEA evaluation systems.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • <u>Ensuring valid and reliable measures of performance.</u> MDESE’s list of multiple measure of student performance (p. 66) is not accompanied with information about how the state will ensure or provide guidance to LEAs in the best use of these types of assessments for collecting meaningful student performance data or for their use in teacher evaluation. • <u>Ensuring special population teachers are included in LEA support.</u> While the state makes a clear statement of connection between its standards and their benefit to all teachers, including teachers of special populations, activities associated with the support for these teachers are not listed, except if they are teaching in priority or focus schools. • <u>Effective piloting.</u> The application does not provide enough detail about the pilot for 2012-13 to determine whether the state will gain sufficient feedback from the pilot to support effective implementation.
<i>Technical Assistance Suggestions</i>	See technical assistance suggestions in the Principle 3 Overall.

Principle 3 Overall Review

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

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

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The process for establishing implementation guidelines for the MDESE’s teacher and principal evaluation system was inclusive of teachers and their representatives. The SEA presented a plan that, if implemented, is likely to ensure that each LEA develops, adopts, pilots, and implements high quality evaluation and support systems.

<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA is examining both VAM and SGP for calculating student growth. • The instructional practice portion of the model evaluation is based on contemporary research in improving student performance. • The SEA will pilot the evaluation systems, including the use of student growth measures. • The SEA has presented a plan to adopt guidelines for evaluation systems that address each of the components of this Principle.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Activities associated with the support for teachers of special populations are not listed, except for those teaching in priority or focus schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA may consider developing guidance to LEAs in the best use of and data collection procedures for the multiple types of measures of student performance listed in the request. • The SEA should consider providing statewide performance standards or developing guidelines around setting local performance standards for summative ratings in teacher and principal evaluations. • It will also be important for the guidelines or other regulations to indicate how performance is differentiated at the summative level and how this summative rating relates to the rubrics provided in the performance level request.

Overall Request Evaluation

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

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	MDESE’s flexibility request meets the requirements of Principles 1 and 3, but fails to meet the requirements to meet Principle 2. Given the significant omissions and flaws in the accountability system, the peers feel that the request as delineated in Principle 2 does not meet the requirements of ESEA flexibility.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Principle 1: The SEA has a well-developed plan for transition to CCSS including crosswalks, professional development, and model curricula. Additionally, the SEA has involved and their representatives in the development of these materials and other plans to successfully transition to new standards. • Principle 3: The SEA has provided a well-developed plan for adopting guidelines and ensuring LEAs implement high quality evaluation and support systems.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Principle 2: • The accountability system, as proposed has some serious deficiencies. The system is compensatory and privileges those who are at the top end of proficiency over those at the lower end of the system. Use of the MPI is compensatory and weights the highest performing students more than the lower achieving students. As proposed, the peers do not believe that this system will help Missouri close its achievement gaps and lead all students to be college- and career-ready. • MDESE only provided in its request the parts of the accountability system specifically addressing the federal requirements, the plan that was submitted appeared to be fragmented. • MDESE has not provided any evidence that it will be able to hold LEAs accountable to implement this accountability system with fidelity. MDESE did not provide comments or feedback from LEAs regarding the flexibility request. • MDESE has not created AMOs that align with the requirements of ESEA flexibility because they do not differentiate goals for Communication Arts and mathematics for all students and all subgroups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider including safeguards have a system that ensures are implementing the requirement of ESEA flexibility in all schools and all LEAs. The SEA should consider including safe consider building in an accountability system that allows them to directly intervene in schools and districts that are underperforming or failing subgroup populations. • MDESE has available data sets that they could “cross walk” to get a more thorough picture of English Learners (W-APT, ACCESS, ACT, End of Course assessments), which would provide a “snap shot” of English Learners’ academic achievement. • The SEA should develop AMOs for reading and mathematics and all subgroups that will be used to identify schools for interventions.