

ESEA Flexibility

Peer Panel Notes



State Request: VIRGINIA

Date: March 26, 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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Lack of evidence of concerted effort to solicit public comment from a broad cross section of educators and communities across the state.
<i>Strengths</i>	No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Public comment opportunities were confined mostly to the State Board meetings and few face-to-face meetings held primarily in the southern part of the state and close to the state capital. Electronic media and use of general media was limited (p. 9). • Lack of evidence of any broad outreach to educators and of targeted efforts to hear from educators and community groups concerned about English Learners and students with disabilities. The Virginia Department of Education (VDOE) used a highly selective process by which associations and groups selected individuals to review the draft flexibility request (p. 9). • The request includes copies of detailed input provided by child and special education advocacy organizations regarding concern over the lack of subgroup accountability, but the request does not reflect any modifications based upon this input and does not discuss how such concerns were addressed (pp. 149 and 155). • There was no indication of how VDOE changed their request due to comments.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Expand the review of the flexibility request for public comment to include all educators and to specifically target educators of English Learners and students with disabilities. • VDOE should establish mechanisms for engagement that extend beyond the initial planning phase. Given major changes in the Standards of Learning (SOLs) and the high stakes use of student growth data, VDOE needs to hear directly from division- and school-level educators as implementation takes place statewide.

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>	No evidence of concerted effort to solicit public comment from a diverse mix of stakeholders. No evidence that some of the more negative comments were taken into account, particularly around subgroup accountability.
<i>Strengths</i>	<ul style="list-style-type: none"> • Conducted round tables and solicited written comments on draft flexibility request.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Organizations listed as participating in the public comment do not include a single organization of teachers, administrators or community groups who teach or advocate for English Learners. • It is not clear how comments were considered in formulating the flexibility request.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Provide widespread opportunities to explain how the flexibility request will address closing of the achievement gap and solicit input from educators and the community, particularly those concerned about achievement gaps and historically underserved subgroups. • Target outreach efforts to civil rights, special education, and English Learner advocates throughout the state.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	VDOE has standards and has a process for ongoing revisions.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE has conducted several years of work in revising its standards following a review schedule established by the State Board of Education and guided by a number of national projects and frameworks by recognized content area councils (NAEP, NCTM, ACT, etc.) (p. 18). • VDOE commissioned studies from ACT, the College Board, and Achieve to compare their postsecondary readiness standards to Virginia’s Standards of Learning in math and English (p. 159). All three found that VA’s mathematics and English standards showed strong alignment with their respective postsecondary readiness standards. • Virginia incorporated findings from the comparison studies into its standards revision and established a process for both the English and the Mathematics standards that included forming a review committee, and significant input from key stakeholders. (p. 160). • Virginia further took steps to conduct alignment studies comparing its English and Math standards the Common Core State Standards and convened K-16 educators to identify modifications needed to bring Virginia standards into full alignment with the CCSS (p. 162). • Virginia’s College and Career Ready Expectations are the result of a multi-year process that has involved the higher education community and joint work of K-16 educators using a framework developed by the Southern Regional Education Board (p. 166).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The “Opportunity to Learn” agenda (still to make it through the legislative branch) does not explicitly include efforts to close the achievement gap and is dominated by expanding partnerships, increasing graduation requirements and testing and it focuses little on instructional reform in K-12 schools to allow students to meet VDOE’s higher standards (p. 16). • VDOE’s request is not reflective of a deeper understanding of current achievement levels and existing gaps.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Need a plan to enable teacher and principal feedback to inform on-going roll-out of new standards. • Need a plan for establishing a working partnership with organizations to inform and assist Virginia with the roll-out of new standards.

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

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

1.B Panel Response, Part B

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>VDOE’s request does not include recognition of its current challenge of achievement gaps. The accountability and support plan does not discuss the achievement gaps that VDOE wishes to close and elaborates little on how interventions and resources can assist in closing the achievement gaps in Virginia.</p> <p>VDOE identified several resources intended to assist all students, but it is not clear how the previous experience with such resources is informing the proposed plan under the new accountability and support system. There needs to be greater coherence and coordination between pieces of the plan and how they will meet the needs of all students, including English Learners and students with disabilities, and ensure that students are learning the content called for in VDOE’s new, more rigorous standards. There needs to be greater quality assurance as Virginia roll-outs implementation.</p>
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE is providing curriculum frameworks to help delineate what teachers should teach based on the revised SOLs. • Enhanced scope and sequence includes lesson plans developed by practitioners, including teachers of English Learners and students with disabilities, and incorporates Universal Design for Learning (p. 20). The lesson plans include resources and specific methods for differentiating the lesson for students with disabilities and English Learners (p. 26). • Virginia is developing curricula interventions like “capstone courses.”

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Virginia’s transition plan is generic in its approach with no focus to close achievement gaps or build enduring capacity of division and schools. Description of external measures of success (NAEP, College Board, SAT, ACT, and AP courses) rarely elaborate on the gaps among subgroups. For example, the AP Success table shown on page 34 shows a percent point gap of 50 and above between the percentage of white students and the percentages of minority student who take the exam. The narrative, however, does not comment on this gap. • VA developed course content for “capstone” courses for English and Mathematics. These courses, however, are intended for students on-track for graduation but who need additional support to make them college and career ready (p. 20). No similar effort is described to meet the needs of students farther behind. • Support and interventions for At-Risk students predominantly revolve around remediation efforts and little enrichment and rigor. The Early Intervention Reading Initiative is one intervention that focuses on struggling students but it has a punitive component of retaining students in 3rd or 4th grade if they are not reading on grade level (p. 24). • Professional development is focused on implementing more rigorous courses but no mention is made regarding building teachers’ competencies to deliver rigorous instruction while providing the appropriate supports for students with disabilities and English Learners or other struggling students who also should be expected to meet the higher standards (p. 24). • VDOE’s description of professional development efforts and initiatives does not reflect new opportunities for delivering innovative professional development in support of the new standards. VDOE proposes to deliver professional development through the existing categorical program meetings and professional conferences (p. 28). • The RtI initiative sessions were held in 2007 and 2008 in the southern part of the State. The description of the RtI initiative is not connected to the larger plan to implement the new standards (p. 30). • Virginia has adopted the WIDA English Language Proficiency (ELP) standards and has done crosswalk work to their SOLs but no further implementation is described related to unpacking the ELP standard so that they are embedded in instruction across the content areas (p. 23). • A number of efforts have been in place for many years, but it is not clear how Virginia has assessed those interventions or how the SEA has learned from them (e.g., RtI and Project Graduation).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • More focus and transition planning for schools and teachers to ensure that the new standards drive instruction for low-performing students. • Need meaningful dialogue and collaboration with diverse groups to address issues raised by stakeholder groups (e.g., those raised by the disability coalition). • Need to develop a coordinated and comprehensive plan that builds on the discrete projects that VA has developed and implemented and found to be effective. For example, RtI is described as an “event,” yet Virginia did not describe how RtI was used to build college-ready courses. • Professional development efforts and initiatives should recognize the new demands resulting from modifications to standards and assessments. The professional development plans and process should be integrated across programs.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	VDOE has a plan that meets the timeline.
<i>Strengths</i>	<ul style="list-style-type: none"> • Test development and cut score setting for the Algebra II test was done jointly by secondary teachers and faculty at Virginia’s two year and four year institutions (p. 36). • VDOE has experience with online testing and technology-enhanced assessments.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE does not allow assessments in other languages. How does this affect accommodations such as bilingual testing booklets? The discussion of technology-enhanced assessments makes no mention of its application for valid and more accurate measures for English Learners through valid linguistic accommodations.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Maximize VA’s experience with technology-enhanced assessments to reduce linguistic barriers to assessing content knowledge of English Learners given that assessments in native languages (other than English) are not permitted.

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>	VDOE has a strong standards development infrastructure that it has leveraged to enhance the quality of its standards and improve student achievement.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE has a history of strong standards development and has shown results through strong NAEP scores. The process for developing the new standards in mathematics and reading/writing is similarly strong and implementation of both the standards and the assessments is ahead of the required timeline required for the flexibility request.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The state is revising and aligning standards and assessments. The statewide use of Student Growth Percentiles (SGPs) for purposes of making growth determinations is significant. The challenge is one of establishing baselines. There is going to be a transition period in which earlier iterations of the SOLs and newer versions of the SOLs will need to be used together. There needs to be alignment in the use of pre- and post-assessments—particularly when decisions regarding school and educator performance need to be made.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE has to address the weakness described above by (1) providing guidance to the school divisions on how to deal with the transition period resulting from changes in the state assessments; and (2) developing a communications plan for use with educators and the general public on the transitions underway in Virginia regarding both standards and assessments and their implications.

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

Response Component	Peer Panel Response
<i>Rationale</i>	While the overall accountability system includes all schools, not just Title I schools, the performance of subgroups does not appear to be a significant factor in the overall state accreditation determinations. It is a factor in the selection of the focus schools. No clear incentive for most schools to close achievement gaps. VDOE's request does not provide an accountability framework that incentivizes continual improvement of all students' achievement or graduation rate over time.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE recognizes that underperforming schools exist in the context of underperforming divisions. Working concurrently at school and division levels is critically important if improvements in performance are to be sustained. • VDOE's request has the potential for having a unified system to assist in the coordination of resources and transparency. • The concept of VDOE's proficiency gap dashboard could be very useful. • The "n size" of 50 will apply to the proficiency gap group as a whole, not the individual subgroups, thus allowing for more students to be counted in this group.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The use of "proficiency gap groups" may mask subgroup gaps. • Proficiency gaps are not required to be addressed for most schools. With approximately 96% of schools meeting full accreditation, the system does not provide significant differentiation for schools with subgroup gaps in proficiency or graduation rates. • Graduation rate gaps are not included in the proficiency gap status. • The proposed mock-up of a proficiency gap dashboard (p. 47) does not provide clarity on subgroup performance to the public and educators. For example, it does not highlight the size or duration of gap.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The performance gap dashboard should include size and duration of gap. VDOE should consider using symbols other than checks and Xs. VDOE should make it clear which subgroups are included in each of the combined subgroups. • VDOE needs a well-crafted communication strategy to explain the new accreditation and accountability system to constituents. • In order to create a truly unified accountability system, VDOE must (1) reinforce the importance of and incentivize student growth in the academic achievement and graduation rates and (2) include subgroup performance (i.e., academic achievement, graduation rates, and gap closing) as a factor in the accreditation system, not just the public reporting.

- 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, 3 No

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	<p>The accountability system is based on state accreditation standards. Tests will be given in four areas: English, math, science, and history. Accreditation is based on the pass rates for “all students” on the tests in all 4 subjects and the graduation and completion index (state defined measure) that includes not only graduation rate, but students earning GEDs, remaining in school, and certificates of completion. Graduation rate only is used separately to identify Title I high schools with a federal graduation rate indicator of 60 % or less as a priority school. Subgroup performance is reported, but 3 gap subgroups are defined to measure proficiency gaps in only reading and math and only used to select focus schools. Schools may be fully accredited, but still have subgroup gaps in academic performance (p. 47). Gap group 1 includes English Learners, students with disabilities and economically disadvantaged (unduplicated). Gap group 2 includes Black students not included in gap group 1. Gap group 3 includes Hispanic students not included in gap group 1.</p>

<i>Response Component</i>	<i>Peer Panel Response</i>
Strengths	<ul style="list-style-type: none"> • High schools need to meet both academic and graduation standards to meet accountability index. • Unduplicated gap groups for Black and Hispanic students allow reporting and attention on those students who do not have other needs represented by English Learners, students with disabilities, and economically disadvantaged students. • High school graduation and completion index incentivizes schools to continue educating students who did not receive a standard diploma in four years.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • Schools may be fully accredited, but still have subgroup gaps. • The Graduation and Completion Index: (1) may mask lower graduation rates by combining diplomas with GEDs and other completion certificates; (2) may weaken the current federally approved graduation rate accountability (which is 80% 4-year cohort graduation rate and 10% reduction in non-graduating students per year); (3) indicates that it is acceptable to have 15% of students dropout continually; and (4) does not emphasize closing the graduation gap for subgroups. • It is not clear why certificates of program completion are weighted at 25 points, while GED recipients are weighted at 75 and students not graduated are weighted at 70 in the Graduation and Completion Index. • Progress over time seems to be a factor for accountability only in exiting the priority or focus school status or moving into a fully accredited status. • Assumes that LEAs will understand and know how to use growth rates, but it is unclear whether this is true.

<i>Response Component</i>	<i>Peer Panel Response</i>
Technical Assistance Suggestions	<ul style="list-style-type: none"> • VDOE should continue conducting careful analysis of achievement data of the 3 gap groups to determine if it places the focus on appropriate student interventions and closing of achievement gaps. • VDOE needs a well-crafted communication strategy to explain new accreditation/accountability system to constituents. • When calculating gaps for gap groups, VDOE should also include a gap for the regular graduation rate based on standard and advanced diplomas (not GCI). • Consider making the first 80 points of the 85 points of the GCI determined by students attaining standard and advanced diplomas in four years. This would align with VDOE’s current federal graduation rate accountability. • VDOE should learn from the divisions in the state that are doing ground-breaking work in these areas (e.g., subgroup identification around learning progress, graduation rates, and instructional responses to address gaps) and disseminate lessons learned to other divisions.

- 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>	It appears that while subgroups are reported, the proficiency gaps are measured for combined subgroups of English Learners, students with disabilities, and economically disadvantaged students and for Hispanics and Blacks, but are only required to be addressed for focus schools and schools not fully accredited. They are used as a factor for some schools in recognition category.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE created gap groups for several reasons: to make one larger group of the traditionally lowest performing students (English Learners,, students with disabilities,, and economically disadvantaged students); and to reflect the performance of the Black and Hispanic subgroups that were just based on race/ethnicity without the additional factors of English Learners, students with disabilities, or economically disadvantaged status. This can be a strength but could be a weakness if individual subgroup performance is masked.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Schools would not be required to address gaps if the school is fully accredited and has not been identified as a focus school. • It is unclear how schools will meet needs for all groups. For example, Hispanic students are included in gap group 3, but Hispanic students receive relatively little mention in the request. • There is no attention to graduation gaps between subgroups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Closing achievement gaps for all subgroups of students involves and requires substantial capacity building at division and school levels. In a state of this size and division diversity, VDOE is going to need rigorous performance standards for the lead turnaround partners and other state-approved contractors. • This strategy requires building the capacity of division- and school-level educators to understand performance data, diagnose the factors within the division and school that are causing the underperformance of all student groups, own the results, and change both instructional and managerial practices. • Clearly explain in VDOE’s revised request how performance gaps are reflected in school accreditation and how all schools, including those fully accredited, will be held accountable for closing the achievement gaps and graduation rate gaps.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Performance on all four subject areas is weighted equally in the accountability system.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE continued to use the 95% participation rate.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Some public comments suggested weighting reading and math more than other subjects (science and history), but no data was provided to show whether this would impact the overall accountability rating of the school.
<i>Technical Assistance Suggestions</i>	None provided.

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>	Virginia’s current AMO targets for all students are higher than proposed targets. Proposed targets understandably are set lower for initial implementation of new assessments, but should see some growth over the 4 years proposed.
<i>Strengths</i>	No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is unclear how VDOE has prepared schools and divisions for all of the changes relating to new standards and tests and the implications of those changes for the AMOs. • The request had a lack of clarity on how targets were set. Targets understandably are initially set lower due to new assessments implemented in 2011-2012, but there is a lack of discussion on how actual targets were determined. Targets were only set through the 2014 test cycle, not through 2018 as required. • There was no change in targets for 4 years presented for English in grades 3-5, only minor changes in reading in grades 6-8 & HS, and no changes in math for all grades for 4 years. In response to questions from the peers, VDOE presented a chart showing an increase in targets from previous implementation of new assessments that showed a dip in student performance, then significant growth over the next two years. Accordingly, growth in targets based on new assessments could be expected. • For English Learners in particular, the plan proposes to hold the Title III AMAOs (targets) for progress (1) and proficiency (2) in acquiring English (p. 48). The current targets for AMAOs 1 and 2 show a slow rate of progress with these targets increasing by only 1 percent a year (Att. 14 on p. 183). The proposed accountability system would allow schools to meet English Learner growth targets even if no English Learner makes progress in acquiring English or is re-designated as English-proficient (p. 46). • VDOE also is requesting that newly arrived students be exempt from testing during the first two years. Currently, under its Accreditation process, VDOE allows English Learners to be exempted from testing for up to 11 semesters.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE needs to prepare schools and divisions for all of the changes from new standards and tests and make sure AMOs are still ambitious during transition period. • AMOs should be realistic and also increase over time. • VDOE should consider areas within the accountability system that provides opportunities to recognize growth in acquiring English language proficiency (ELP). VDOE should include all English Learners, except for new arrivals in their first year, in the accountability system.

2.C Reward Schools

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

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	There are several systems in place that offer recognition to schools. Large numbers of schools are classified as reward schools. It is unclear how many are Title I schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE provides methodology for highest-performing schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE does not identify criteria for determining high-progress schools. • The Virginia Performance Index (VIP) recognition system identifies a large number of schools. The overlapping systems present the opportunity for confusion.
<i>Technical Assistance</i>	<ul style="list-style-type: none"> • VDOE should clarify the chart and numbers on the VIP system. • VDOE should consider refocusing the reward criteria to truly recognize the highest performing and highest progressing schools in the State. • VDOE should make it clear how it is integrating the accreditation process with the proposed new accountability systems. VDOE should cross-walk how the schools recognized by the VIP system match the other criteria for reward schools in the Title I Distinguished Schools program.

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>	The VIP system for recognition was revised in February 2011, prior to the ESEA flexibility option. A large number of schools are currently recognized under this system. VDOE did not specify consultation with LEAs and schools.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE includes a STEM focus to the existing state-reward program for high achieving schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is a lack of information on how LEAs and schools were involved in the design of the recognition program. • The VIP Base index does not include any weights for subgroup performance or credits for closing achievement gaps. In contrast, the Title I program does include criteria related to exceeding statewide averages in English and Math for all proficiency gap groups of students (p. 50). • Attachment 15, page 184, lists the criteria but lacks definitions for a number of codes in the criteria table. • Only one of the 22 criteria considers the achievement of subgroups. Criteria M is “students in each subgroup who graduate from high school with Standard or Advanced Studies Diploma (increases annually, state goal 85%)” (p. 185).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The challenge here is to effect a blend of rigor (the accomplishment and concomitant recognition need to be significant) and realism (it has to be achievable). As early results start coming in, VDOE will need to be vigilant in continually checking to see if the plan, in practice, is actually being both rigorous and realistic. • Streamline recognition system so it aligns with accreditation systems.

2.D Priority Schools

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

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

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Virginia's proposed interventions for Priority schools exactly match the required interventions in the ESEA flexibility request and guidance.
<i>Strengths</i>	<ul style="list-style-type: none"> • It is clear that all principles will be required to be implemented.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Family and community engagement is not a true factor in VDOE's plan.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The Flexibility request simply reiterates the federally required turnaround principles and the four models. VDOE needs to be clearer and more specific about how these principles will be utilized to identify and address the causes of school underperformance.

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: 1 Yes, 5 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The interventions are comprehensive and match the flexibility guidance, so should have the likelihood of increasing the quality of instruction and improving student achievement. The lack of examples hinders the understanding of exactly how the principles will be implemented.
<i>Strengths</i>	<ul style="list-style-type: none"> • Each priority school will hire a Lead Turnaround Partner (LTP) or other external partner to assist the school in implementing the turnaround model chosen. • VDOE recognizes that underperforming schools reside in underperforming districts.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE does not provide further specification of activities other than implementing one of the four models and echoes the turnaround principles stated in the request. • VDOE requires LEAs to spend funds on hiring an external LTP from a list of VDOE approved providers. The flexibility request, however, does not include any specific information about the LTP expertise or experience (p. 54). • VDOE does not reference the various resources and initiatives listed in section 1B (p. 29) related to instructional materials, professional development and other components of the transition to college and career ready standards. How are priority schools served and given ‘priority’ by the various state initiatives and existing support structure? The lack of such explicit connection makes the request seem disjointed.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE should specify feedback loop to improve interventions for priority schools. • Explain in the flexibility request how the VDOE will ensure that the LTPs are providing quality assistance to the priority schools.

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

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

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

2.D.iv Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Currently served SIG schools will continue through their 3-year time frame per the current grant awards. Newly identified priority schools will all begin in 2013-2014.
<i>Strengths</i>	<ul style="list-style-type: none"> • Newly identified priority schools are required to hire an LTP by January 2013 to assist with planning the implementation that will begin in 2013-2014.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • No weaknesses noted.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None provided.

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

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

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

Tally of Peer Responses: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	SIG schools currently served will exit at the end of their three-year implementation cycle unless they are re-identified as a priority school due to meeting one of the other three criteria for identification. Schools will implement selected strategies for a three-year period. The exit criteria are based on the reason the school was identified.
<i>Strengths</i>	<ul style="list-style-type: none"> • Schools exiting priority status based on criteria C or D will have reached full accreditation status, which would clearly show an improvement.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The identification criteria A and B are not linked to the accreditation system. • To exit based on criterion B, the graduation rate has to only be 61%. Is this significant improvement? It would depend on the starting point of the graduation rate. • Meeting the exit criteria based on one year's determination is not sufficient evidence of being able to sustain improvement over time.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE should clarify the exit criteria from priority status as it relates to their accreditation status for each criterion. • VDOE should use at least two years of meeting the criteria before exiting priority status.

2.E Focus Schools

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

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

2.E.i.b Panel Response

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Focus schools are identified based on the average of the largest proficiency gaps of three gap subgroups: (1) English Learners, students with disabilities, and economically disadvantaged; (2) Black; and (3) Hispanic students. Gap group 1 would likely be the lowest performing group, but averaging with the other groups could mask low performance of English Learners of students with disabilities.
<i>Strengths</i>	<ul style="list-style-type: none"> • The ranking methodology for selecting schools with largest gaps would be easy for public to understand.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE needs to clarify how the performance of the individual subgroups would be impacted by the proficiency gap subgroups. • Graduation rate gaps in subgroups are not addressed. • The methodology renders single average number that masks too many important distinctions to address achievement gaps. Gap Groups 1, 2, and 3 already are average achievement scores of distinct NCLB subgroups but the methodology further collapses their performance by calculating an average of all three groups. It further collapses the performance by averaging the average proficiency gap points for English and Math to produce a single number as the Total Average Proficiency Gap points. This single number may be useful for ranking schools but it masks too much information for schools to address a particular content area or particular needs of a subgroup of students (p. 55).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Revise the methodology to make productive use of the newly created gap groups to identify gaps by content area (not a combined gap) so that the identification also signals important information as to the areas that need most help in any given school. Otherwise, the current methodology does not provide transparent information to the public as to the content area where gaps exist nor the gap groups affected by the achievement gaps.

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

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

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

2.E.iii Panel Response*Tally of Peer Responses: 5 Yes, 1 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Focus schools will be identified for two years, will begin implementation in fall 2012 and continue for at least two years, or until they exit focus status. Each focus school assigned an external VDOE contractor to facilitate needs sensing interview. Based on needs, division convenes a team with key staff instruction, Title I, special education, and English Learners. Interventions based on data, with data points analyzed quarterly. Use online CII Indistar planning tool that includes rapid school improvement indicators. Contractor helps build support.
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE attempted to do something new with their “change mapping.” • VDOE realized that the same individual that is doing the TA cannot do the monitoring. Strong to bring in contractor.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The interventions described in the request are generic and focus on process rather than tailored and targeted interventions to address the needs of particular groups to close achievement gaps (p. 57). (For example, VDOE works with division level staff to ensure processes are in place to support the improvement of schools). State efforts are focused on procedural steps to implement a theory of action and classify divisions by the status of implementation. • The SEA does not identify interventions that would be appropriate for different school levels (elementary, middle, and high). • There is no systemic effort to build State and local level capacity. VDOE will assign an external VDOE contractor to work with each division that has one or more focus schools. This does not build capacity at the State level and it is questionable whether this will build capacity at the local level (rather than build dependency) absent clear quality standards from VDOE for the process. • There is not a connection to the other resources in the State mentioned in Principle 1 in the description of transition to college and career ready standards. There needs to be clarity regarding the roles of the technical assistance centers (funded by federal funds, State) and universities in support of the improvement of such schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The process is sound. While VDOE has a list of approved contractors, it will need to be vigilant in ensuring that the contractors have the skills needed to guide and support the process. VDOE needs to clarify how the contractors will be evaluated and how VDOE will help divisions to evaluate contractors. VDOE must continue to provide training to contractors in strategies for coaching and building capacity of the division in working with low performing schools.

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

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

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

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

Tally of Peer Responses: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Focus school must implement interventions for two years, then may exit focus status if indicators of progress (pp. 46-47) are met or school is no longer in 10% of Title I schools identified as focus schools. VDOE allows for showing growth in proficiency gap groups through student growth percentile measures or through reduction of failure rate by 10 percent (similar to safe harbor).
<i>Strengths</i>	<ul style="list-style-type: none"> • VDOE’s exit criteria align with the reasons the school was identified as a focus school.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE’s request indicates that graduation rates will not be a factor in identifying focus schools, and gaps in subgroup graduation rates are not included (p. 56). • VDOE needs to flesh out their growth model. Right now, it uses normative growth, not growth to standard. • Focus school status is for two years. Sustained and sustainable improvement is likely to take more time if it is going to be more than a short-term compliance activity. • Exit criteria that focuses on bottom 10% of Title I schools may mask growth or mask underperforming schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • This strategy requires building the capacity of division- and school-level educators to understand performance data, diagnose the factors within the division and school that are causing the underperformance, own the results, and change both instructional and managerial practices. • Schools should not be able to exit focus status after one year of growth; should be at least 2 years of sustained growth. • VDOE should consider using graduation rates will not be a factor in identifying focus schools, and gaps in subgroup graduation rates are not included (p. 56).

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

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

2.F.i Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	All schools not fully accredited have an academic review team to review areas of need and assist in developing 3-year school improvement plan. The review and plan include indicators of effective practice. VDOE monitors the plan and progress of schools. For schools in more need (accreditation denied), they must enter into MOU with Virginia School Board of Education.
<i>Strengths</i>	<ul style="list-style-type: none"> • All schools that are not fully accredited are part of the plan; however, this currently only represents 4% of all schools. • VDOE plans to use an online planning tool (Indistar) through the Center on Improvement and Instruction. • VDOE is including in the system of supports high school graduation rate, which includes the Virginia Early Warning System to identify and support students at risk of dropping out or not graduating. • Academic review teams and the creation of a 3-year plan are strong features.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The flexibility request describes a variety of tools and an early warning system. It is unclear exactly how these will be applied or made available to other Title I schools, and how the state will ensure that they are used effectively. • The system does not take into account gaps.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE needs more attention on the achievement gaps and how schools will use interventions effectively. • VDOE needs to be explicit in how the tools will be applied, integrated, and made available to other Title I schools, and how the state will ensure that they are used effectively.

- 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: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Academic review and follow-up school and division teams are charged with creating and implementing a 3-year school improvement plan to address all weak areas in school achievement. This would include instruction for all students including English Learners and students with disabilities, even though these groups are not addressed in detail in the narrative.
<i>Strengths</i>	<ul style="list-style-type: none"> • The incentive provided by the accountability system is for schools to be fully accredited for public recognition. • Supports are provided through specific development of school improvement plans or corrective actions based on results of academic reviews. • Division and school support teams are required to have members from areas across the school and division to support all students.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Teams are required to have members from special education, but other than that, special education students are not addressed as having separate need. There is no specific mention of English Learners. • There are a number of Virginia school divisions that have experienced significant demographic change during the past decade. Yet the needs of English Learners and how these needs will be addressed are referenced in general terms; few specifics are provided. • VCSWD has raised numerous issues regarding the needs of students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE should consider a specific accreditation designation for schools with substantial gaps.

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

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

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

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	Reviews and support are provided both at division and school level. Comprehensive system includes support for all schools not fully accredited. Required online tools and monitoring systems provide consistency across schools to make analysis and support more efficient. Funding provided through 1003a and 1003g Title I school improvement funds and optionally through the 20% Title I set-aside at the division level.
Strengths	<ul style="list-style-type: none"> • VDOE required online tools and monitoring systems. • VDOE requires external partners for priority schools and contractors support focus schools.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • Will funding through 1003a, 1003g, and Title I 20% set-aside be sufficient to support all priority and focus schools? The amount of funding was not addressed in terms of the possible need or number of schools.
Technical Assistance Suggestions	<ul style="list-style-type: none"> • VDOE should clearly define the process for ensuring the quality of the performance of external providers including both the Lead Turnaround Partners and the contractors.

Principle 2 Overall Review

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

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	An accreditation-based accountability system has the potential to be publically understandable and effective. But, as currently presented, only some elements of the accountability system are likely to improve student achievement. Questions still remain about the identification, reporting, measurement of progress, and support for closing achievement gaps and graduation rates of subgroups in all sections of Principle 2. There appears to be a missing category in the accreditation-based accountability system for schools that have met the all-students achievement criteria but still have large achievement or graduation gaps for subgroups. Finally, the current system does not sufficiently encourage or recognize continuous improvement in student academic growth.
<i>Strengths</i>	<ul style="list-style-type: none"> • One unified system of accountability has the potential to eliminate confusion between federal and state accountability systems.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE’s system based primarily on schools being fully accredited based on the all students group meeting the AMOs does not significantly differentiate between schools. There is a lack of accountability for closing the achievement gap for subgroups for many schools as it is only required for priority and focus schools. Specific strategies for supporting English Learners and students with disabilities in the general classroom and accessing the regular curriculum were inadequate throughout the principle.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Do not weaken current graduation rate accountability. In the graduation rate index, at least 80 points of the 85 points of the index should come from standard or advanced diplomas. • Consider raising the index incrementally after 2015 so as not to be satisfied with a 15% dropout rate. • Include graduation gap as criteria for gap groups and for school designation (reward and focus schools). Large graduation gaps are apparent on page 63. • VDOE should consider 5 or 6 year graduation rate for students with disabilities or English Learners. • VDOE should consider adding a category in the accreditation-based accountability system for schools that have met the all-students achievement criteria but still have large achievement or graduation gaps for subgroups. • VDOE should consider revising the accountability system to provide encouragement or recognition for continuous improvement in student academic growth.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A**:

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

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

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

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

Tally of Peer Responses: X Yes, X No

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

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

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

Tally of Peer Responses: X Yes, X No

<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. 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: 3 Yes, 3 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Overall, the flexibility request includes a thoughtful use of professional standards, but because the weightings on each standard (including Standard 7 – Student Academic Progress) are determined locally, it will likely produce a fragmented system that will have limited impact on student learning. The recommended weighting was 40% overall for Standard 7. This would be strong, but it is not required.
<i>Strengths</i>	<ul style="list-style-type: none"> • The performance standards are clear and research-based.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There are four rating categories. Yet “effective performance” only merits a “proficient” rating (p. 78). This will not be well-received by principals and teachers, particularly in school divisions that are focused on a continuous improvement approach to school and district improvement. • The funds requested to provide performance evaluation training in the Governor’s budget for FY 13 and FY 14 are insufficient for a state of this size and diversity.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE should re-label the rating category “proficient” to “effective.” • VDOE should demonstrate leadership by defining what level of student growth constitutes a “significant component” in an evaluation system. VDOE needs to be clear on the minimum weight for Standard 7.

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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	VDOE used a statewide work group and two external consultants.
Strengths	<ul style="list-style-type: none"> The charge of the work group was comprehensive. It drew on INTASC and NBPTS standards.
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> Piloting is only in 25 schools. The purpose of a pilot is experimentation and field-testing. What specific learnings does VDOE expect to derive from the pilot? It is unclear how the learnings will be used to further refine the new evaluation systems. The role of teachers of students with disabilities or English Learners as part of work groups is unclear.
Technical Assistance Suggestions	<ul style="list-style-type: none"> As VDOE moves towards implementation, it will need to establish mechanisms for securing candid feedback from school divisions on challenges encountered, levels of buy in, and supports needed. VA needs to ensure it gets feedback from disability and EL teachers and stakeholders.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	There are 7 teacher performance standards and 7 principal performance standards. These are captured in a Guidelines and Evaluation Criteria document. In each case, 6 of the 7 are very much drawn from continual improvement strategies (in each case, the 7th standard focuses on student academic achievement).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • This is a thoughtful approach if implemented at the level being recommended. However, it can easily be watered down and the importance of student growth can be lessened considerably if the VDOE framework is only a recommendation.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The letter from the Virginia Coalition for Students with Disabilities identifies 11 organizations which advocate for students with disabilities who feel that VDOE has not meaningfully engaged with them—a serious omission. • Some of the terms in the system were undefined, such as “high performance” (p. 78) or “teacher observation.”
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE should establish a minimum required threshold for student academic growth in the new evaluation system. • VDOE should address the concerns raised by the coalition, with particular attention to issues raised regarding Proficiency Gap Groupings. • VDOE should establish mechanisms for securing ongoing input from educators and the statewide educators association. As implementation begins, VDOE should conduct spot checks for purposes of quality assurance in the school divisions that have in recent years shown significant growth in EL student populations.

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: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • There are 4 performance level definitions for, respectively, teachers and principals: exemplary, proficient, developing/needs improvement, and unacceptable; and performance appraisal rubrics. • For teachers, state guidance stipulates that 40% of the summative evaluation is based on student academic progress (20% SGPs and 20% valid alternative measures). For elementary and middle school principals, 20% is based on SGPs and 20% Student Academic Progress Goals. For high school principals, the entire 40% is based on SGPs. • There will also be performance standards for superintendents. Recommendations are expected in September 2012. • However, none of these weightings are required which calls into question the entire VDOE commitment to student growth as a significant factor in teacher and principal evaluation.
<i>Strengths</i>	<ul style="list-style-type: none"> • This is potentially a major step for the VDOE, but only if the resulting division-level evaluation systems have a significant emphasis on student growth.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • To be successful, this approach to evaluation systems will require widespread understanding of SGPs and improvements to the SOLs so that they are rigorous, aligned with the CCSS, credible with site level educators, and reinforced with substantial on the ground training. • The districts should also be required to implement the guidelines as written. VDOE needs to make clear that a serious focus on student academic growth is non-negotiable as a requirement for teacher, principal and superintendent evaluation in all Virginia divisions.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE needs to provide a higher level of prescriptive direction in this area, particularly with regards to Standard 7. • VDOE needs to be intentional in building the capacity of the school divisions so that the issues identified above are addressed. Due to limitations with the SOLs to-date, school divisions have been hampered when trying to look at gain or growth. • There needs to be more clarity around the 20% for valid alternative measure. VDOE needs to be clear on: <ul style="list-style-type: none"> ○ what assessments can be used, ○ what criteria must be met, ○ whether teacher-developed assessments are allowable, ○ whether performance-based assessments are allowable, and ○ standard for validity which divisions need to meet when using assessments for evaluative purposes. • VDOE needs to be clear on the definition of the term “tools already available in schools.” • VDOE should do an assessment of capacity at the division-level to aggregate multiple sources of quantitative and qualitative data for evaluations. VDOE should invest in a state-wide system that the divisions could choose to use or identify a pool of products for assessment.

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	While the guidelines indicated 40% student academic growth in the recommended model, the divisions have the discretion to determine the commitment to an evidence-based approach to evaluation. There's general language regarding "valid alternative measures" and "validated, quantitative, objective measures, using tools already available in the school."
<i>Strengths</i>	<ul style="list-style-type: none"> • The general intent opens the door to a system of multiple measures—if VDOE is prepared to require a significant percentage of demonstrable student academic growth as part of the evaluation system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • While it is possible that the document, Guidelines for Uniform Performance Standards Evaluation Criteria, may address some of the weaknesses in the flexibility request, there is lack of clarity on a lot of key issues. • VDOE has a pre-existing system of SOLs that do not measure academic growth and is moving to a system in which SOLs will measure academic growth. It is unclear how VDOE will make the transition from the former to the latter, particularly when these assessments will be used for the high stakes purposes of teacher and principal evaluation. Baselines will need to be established in order to make growth determinations, yet a baseline established with the non-growth SOLs and a post-assessment made with the revised SOLs means there is imprecision built into the system during the transition phase. VDOE does not provide an operational response to this issue. • VDOE did not describe the issues around the fact that many teachers in the non-tested grades and subject areas will not have SGPs. There needs to be clarity around how student academic growth will be determined for these teachers. The entire challenge of addressing needs for appropriate assessments, potential methodologies (such as student learning objectives), rigor, and comparability on the non-tested grades and subject areas is not discussed by VDOE. • The guidance for incorporating multiple measures of student academic progress into the teacher evaluation does not address either teachers of English Learners or students with disabilities.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • As described in the Rationale and Weaknesses sections, VDOE has to think through the guidance and supports divisions will need. VDOE should address the questions above in meaningful terms, and with an emphasis on building division capacity with a process that will help more educators to be more effective with more students. • In the area of assessments and student academic growth, VDOE needs to provide guidance related to <ul style="list-style-type: none"> ○ what standards of validity are required, ○ which criteria need to be met to satisfy that the measures are objective, ○ how rigor and comparability across classrooms and schools will be addressed, ○ what assistance divisions will need to make informed decisions in these areas, and ○ whether growth be examined differently for different student populations. • VDOE needs to provide more detail regarding teacher observations: <ul style="list-style-type: none"> ○ the expectations for meaningful evidence, ○ the standard for inter-rater reliability, ○ the expectation for inter-rater consistency, and ○ how raters should be trained and certified. • VDOE needs to develop criteria for locally-developed assessments to ensure these are valid for measuring progress of English Learners and students with disabilities.

- (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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	VDOE is focusing on SGPs as the methodology for determining growth in the tested grades and subject areas.
<i>Strengths</i>	<ul style="list-style-type: none"> • SGPs are a valid approach for measuring growth. SGPs can be made understandable for site-level educators.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • To date, student growth has not been a big part of the lexicon in Virginia. Consequently, VDOE will need to build a constituency at the division level that supports this approach. Many of Virginia's larger divisions have quite a bit of data and analytic capacity. A particular challenge for VDOE will be to help the smaller, more rural divisions to move effectively in the direction of student growth.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • VDOE is going to need a strong communications strategy for communicating with teachers, principals, superintendents, and school board members. Further, it will need to be prepared to help the smaller divisions prepare for what is essentially a sea change.

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The language in the flexibility request is often very general. While the overall architecture of the evaluation systems is sound (were the recommended framework to become required), there needs to be more specificity regarding the criteria for allowable measures/assessments, the definition of validity, and the system for ensuring quality implementation.
<i>Strengths</i>	No strengths noted.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There are major gaps regarding how teachers in the non-tested grades and subject areas will be evaluated. • There is also a need to clarify how teachers will be evaluated who lack a pre-test in their subject areas. In the request, VDOE does not demonstrate an awareness of this need.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Unless the Guidelines document addresses the issues described above, VDOE will need to develop responses to these issues promptly. In Virginia, as in many states, school divisions characteristically like to point out flaws in state plans. If unaddressed, the thoughtfulness and potential impact of VDOE’s overall strategy for educator evaluation will be undercut by its insufficient attention to key details of implementation and by VDOE’s failure to show leadership by requiring an explicit level of student growth in the new evaluation systems. • VDOE needs to give examples and provide support in developing “validated, quantitative, objective measures” (p. 79). • Given the likelihood that these do not exist in many schools, VDOE needs to provide the guidance to divisions on how to develop and/or purchase such measures or assessments.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	No rationale provided.
<i>Strengths</i>	No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	No weaknesses noted.
<i>Technical Assistance Suggestions</i>	The two issues that always come up when implementing new evaluation systems are capacity and time. The discussions around the performance standards—discussions between principal and teacher, and between school supervisors and principals—need to be based on evidence, encourage reflection, and provide a basis for continually improving performance. VDOE should recommend best practices to the divisions for making these discussions meaningful and manageable within the schools.

- 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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The link between the professional development and evaluations needs to be much clearer.
<i>Strengths</i>	<ul style="list-style-type: none"> • If the standards for both teachers and principals are used in the evaluative context of a continual improvement process, and not as an exercise in compliance, they could be used effectively as a basis for differentiating professional development for teachers.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is not clear how the evaluations would lead to targeted professional development. This does not happen automatically. Smaller and more rural divisions, in particular, will need assistance from the state around ways to use evaluative feedback to inform, guide, and differentiate professional development. • VDOE needs to be explicit in requiring a specific threshold of student growth in teacher and principal evaluation systems.
<i>Technical Assistance Suggestions</i>	None provided.

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: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The statute requires that evaluations are used to inform as personnel decisions.
<i>Strengths</i>	The statute requires that evaluations are used to inform as personnel decisions.
<i>Weaknesses, issues, lack of clarity</i>	The question is whether evaluations will be used to inform personnel decisions in a meaningful, professional way. The answer will depend on whether the divisions have sufficient capacity to implement the new evaluation systems.
<i>Technical Assistance Suggestions</i>	Divisions can be all over the map in terms of how they inform and make personnel decisions. VDOE should help the divisions understand how the new evaluation systems can inform and guide such decisions. This can be a significant challenge in smaller divisions that often lack professional human resources practices and policies.

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

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

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

included in the LEA's teacher and principal evaluation and support systems?

- *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The core approach is sound if the recommended framework becomes a statewide requirement. While there are numerous potential positives in the VA approach, many of the details touched upon in these questions need to be addressed and/or refined as VDOE moves forward.
<i>Strengths</i>	There is an automated system to collect evidence for performance standards and will help the state monitor the implementation of rollout.
<i>Weaknesses, issues, lack of clarity</i>	The teacher evaluation system is being piloted in just 25 schools. What is the construct of the pilot? Which schools? Which teaching assignments? Does the pilot include teachers in both the tested and non-tested grades and subject areas? What criteria were used to select participants? How representative are these schools of the rest of the State?
<i>Technical Assistance Suggestions</i>	The nine question areas listed above in this form should be used to guide the next stages of development of the new evaluation systems in VA.

Principle 3 Overall Review

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

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

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The approach overall is potentially strong and could be helpful if VA makes the levels of student academic growth and the other weightings of the standards—as currently recommended in the new framework—a statewide requirement.
<i>Strengths</i>	<ul style="list-style-type: none"> • The main strengths are the performance standards, the research base, the openness to the use of multiple measures, and the approach to student growth in the tested grades and subject areas.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • VDOE has not established a minimum required threshold for student academic growth in the evaluation systems. • VDOE has not sufficiently addressed the needs of teachers in the non-tested grades and subject areas. • VDOE needs to anticipate the challenges that divisions are going to have in implementing this new evaluation system and work to provide technical assistance and guidance.
<i>Technical Assistance Suggestions</i>	Previously addressed in the various sub-sections.

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>	<p>For Principle 1, VDOE has a strong standards development infrastructure that it has leveraged to enhance the quality of its standards and improve student achievement.</p> <p>For Principle 2, an accreditation-based accountability system has the potential to be publically understandable and effective. But, as currently presented, only some elements of the accountability system are likely to improve student achievement. Questions still remain about the identification, reporting, measurement of progress, and support for closing achievement gaps and graduation rates of subgroups in all sections of Principle 2. There appears to be a missing category in the accreditation-based accountability system for schools that have met the all-students achievement criteria but still have large achievement or graduation gaps for subgroups. Finally, the current system does not sufficiently encourage or recognize continuous improvement in student academic growth.</p> <p>For Principle 3, the approach overall is potentially strong and could be helpful if Virginia makes the levels of student academic growth and the other weightings of the standards—as currently recommended in the new framework—a statewide requirement.</p>
<i>Strengths</i>	No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	No weaknesses noted.
<i>Technical Assistance Suggestions</i>	None provided.