ESEA Flexibility

Peer Panel Notes

State Request: Rhode Island
Date: 03/28/2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

   ➢ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*

   ➢ *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

   Consultation Question 1 Panel Response
   Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE provided evidence that it consulted stakeholders about its application, including teachers and their representatives. Stakeholders included teachers, administrators, parents, advocacy groups, and school districts. RIDE used both formal and less formal means (*e.g.*, social media) to communicate its ideas and receive feedback. The SEA gave an example (inclusion of participation rates in the accountability model) as an example of how it used field input in shaping its plan.
Strengths	• RIDE has used a consistent and on-going plan to reach out to educators, parents, and advocates both in formulating its plans and to receive feedback on its tentative ideas in order to arrive at a good request. Attachment 1 shows several examples of outreach e-mails and other communications designed to obtain educator and public input to the RIDE plan. Attachment 2 gives examples of the feedback received. Attachment 3 provided examples of the notifications for public comment the SEA used to obtain feedback on the draft plan. • RIDE sought and received input during both the draft phase and as a follow-up opportunity for feedback.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based

organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

➢ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*

➢ *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*

➢ *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

Consultation Question 2 Panel Response
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE contacted many diverse organizations and individuals during development and review of its draft plan. Community organizations, advocacy groups, and business leaders were among the groups consulted in drafting and reviewing the plan. Table 1 in RIDE's application shows that a wide variety of groups and individuals were consulted.
Strengths	• RIDE indicated that it received feedback from educators, families, community groups, and advocacy groups emphasizing the need for additional student supports and interventions for high needs/at-risk students (i.e., English Learners and students with disabilities (p. 12). RIDE indicated that educators for these students supported this need. Advocates for English Learners also requested a waiver for the participation of first-year English Learners in Rhode Island's mathematics assessments, and RIDE incorporated that information in its plan.
Weaknesses, issues, lack of clarity	• While RIDE clearly sought and received feedback, peers questioned how feedback was incorporated into its flexibility request.
Technical Assistance Suggestions	• RIDE should provide details about how feedback was used to address stakeholders' concerns.

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

Response Component	*Peer Panel Response*
Rationale	• The activities described are of high quality and should assure that Rhode Island will be well under way in implementing these activities by the 2013-14 school year. RIDE indicates that it has approved the use of the Common Core State Standards (CCSS), has begun the process of transitioning LEAs to them instructionally, and is adapting its current assessments to them. This includes development of professional development activities to assist teachers to provide instruction to students with disabilities, English Learners, and low-achieving students (p. 22). The SEA will also be developing principals' capacity to guide school reform efforts. RIDE is also working with the Dana Center and a sub-set of its LEAs to develop CCSS instructional materials to be provided later to all its LEAs (pp. 25-26).
Strengths	• Using its RTTT funding, RIDE has developed a comprehensive outreach and professional development plan to create awareness, support, and use of the CCSS for instructional planning and delivery. The training appears to be thorough and comprehensive; over 4,000 local educators have been trained. In addition, higher education representatives are included in the training sessions.
Weaknesses, issues, lack of clarity	• RIDE is using a "train-the-trainer" model, as one component of their plan, rather than direct instruction to all educators. While a train-the-trainer model may be useful in developing leadership as well as knowledge, it is important to ensure that the training resulted in the intended competencies and skills. Peers are not certain how the SEA will monitor the outcomes of the training and successful implementation of the model in its schools.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• RIDE should indicate how it will ensure that all teachers learn to use the CCSS instructional resources provided by the SEA, external organizations, and/or local districts.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE's request details how it will provide specific support for English Learners and students with disabilities. This includes activities that will occur because of its participation in the National Center and State Collaborative (for students with disabilities) and the WIDA consortium (for English Learners). It indicates in its application the steps that it is taking to improve the college- and career-readiness of both groups of students (pp. 31-32). Higher education institutions in Rhode Island are also involved in assuring the college readiness of high school graduates (p. 33).
Strengths	• RIDE has taken a number of steps, individually as well as in consortia with other states, to develop plans and materials to help all students – especially students with disabilities and English Learners – to become college- and career-ready. These steps will help ensure that these and other students are given access to instruction that will enable them to succeed. RIDE also has worked to implement a works skills certification program for students as a future high school graduation requirement (p. 35). • The SEA requires that its assessment system is appropriate for all students and demonstrates an awareness of the needs of specific populations (subgroups). The SEA is a member of WIDA and will use a system that is aligned to CCSS. The SEA has partnerships with the Center for Applied Linguistics and the Wisconsin Center for Education Research to continue development of seamless standards for English Learners with a goal of ensuring that English Learners have access to content. The SEA demonstrates knowledge of the linguistic complexities facing English Learners and provides training for all teachers on the needs of English Learners.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

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

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

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

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

1.C, Option B Panel Response
☒ *Not applicable because the SEA selected 1.C, Option A or Option C*
Tally of Peer Responses: NA

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

Principle 1 Overall Review

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

Principle 1 Overall Review Panel Response
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE's plans and activities provided in its application seem very likely to lead to successful implementation of college- and career-ready standards curricula, instruction, and learning activities for all students, especially students with disabilities and English learners.
Strengths	• The plans for transitioning to CCSS described in its application appear to be comprehensive, coherent, and will likely lead to the implementation of high quality instruction on the CCSS for all students.
Weaknesses, issues, lack of clarity	• Because the SEA is not providing <u>direct</u> professional development to all teachers, RIDE should develop and implement a process for monitoring whether and to what extent all educators are assisted in implementing the CCSS strategies.
Technical Assistance Suggestions	• An on-going monitoring and improvement loop for its continuing professional development efforts may help ensure even greater success in implementing high quality college- and career-ready instruction for all students. • RIDE should ensure that processes and materials are in place to successfully train-the-trainers.

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
Rationale	• RIDE proposed a comprehensive model for accountability starting in the 2012-13 school year that provides for a differentiated approach to school improvement efforts based on tiered levels of interventions that has the potential to improve student achievement, close gaps, and increase the quality of instruction for students. RIDE's proposed accountability system appropriately includes the use of a weighted index based on multiple measures including achievement, growth, progress toward closing subgroup gaps, and graduation rates. RIDE proposed a system of interventions and support for schools with achievement gaps. • While the system itself has considerable merit, peers were not convinced that the proposed system would be likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students because of an overarching concern about subgroup consolidation that led peers to call into question the efficacy of and thus call into question RIDE's model for selecting and using the consolidated subgroups throughout the flexibility request. Our concern is the way in which RIDE elected to combine students by minority and poverty status into a single group (Consolidated Minority/Poverty Subgroup) and English Learners and students with disabilities into a single group (Consolidated Program Subgroup). Peers did not feel confident that RIDE demonstrated a valid justification for creating the proposed consolidated subgroups. Moreover, peers believe that alternatives to this model for consolidation exist and should be examined. • The peers recognize that RIDE's intention in creating the consolidated groups was to capture as many schools as possible in order to hold them accountable for subgroup progress, and the peers commend RIDE for its concern for and attention to these subgroups. However, the approach is problematic for a number of important reasons. Consolidated subgroups may mask specific subgroup issues or needs that are persistent in one of the combined groups. The current system as proposed may lead to the inappropriate identification of schools, being that starting from what is considered a problematic consolidated subgroup calls into question whether the correct schools are being targeted for accountability purposes. What evidence does RIDE have that consolidating these subgroups will not mask larger gaps in one than the other, thereby making it less likely that appropriate interventions will occur? How will they differentiate and assign resources? Even though schools may use their own data to develop plans, the intensity of support may not be available in areas where needs are the greatest.

Response Component	Peer Panel Response
Rationale	• Peers also noted that stakeholders voiced concerns (Attachment 2) regarding the proposed consolidated subgroups, but there is no evidence that these concerns were considered. • <u>Consolidated Program Subgroup</u>. The conflating of language minority status and disability status is fundamentally unsound and raises significant concerns about the ability of RIDE and its LEAs to address the specific and very different needs of these two groups. There are many unintended consequences in consolidating English Learners and students with disabilities into a single group, including perpetuating the well-documented over-identification of English learners as students with disabilities. In particular, students with disabilities in the consolidated subgroup should be given targeted interventions appropriate to their needs, as should English Learners, and combining the two could result in collapsing supports and interventions into one stream, thus providing inappropriate interventions to both groups. • <u>Consolidated Minority/Poverty Subgroup</u>. The conflating of poverty and race is similarly unsound and sustains negative stereotypes that have long governed similarly negative educational practices. • <u>Performance Reference Group (PRG)</u>. Peers are also concerned about the proposed "relevant targets" associated with the identified performance of the geographical reference groups among LEAs. With the current proficiency levels, white students in the urban ring seem to have a lower bar for demonstrating growth, which also affects the bar for the consolidated subgroups. Using this type of methodology perpetuates different expectations for the same subgroup, based on the geographic location of the school.
Strengths	• RIDE includes participation rates and the results of students on alternate assessments results in the accountability system. • Multiple measures are used in the index and separately to identify schools with the greatest needs. • RIDE has reduced the "n-size" for accountability from 45 to 20 so that more schools are held accountable for closing gaps.

Response Component	*Peer Panel Response*

Weaknesses, issues, lack of clarity	• A number of concerns were raised by peers:
	
	   o RIDE solicited and received feedback from relevant parties about the appropriateness of combining these subgroups, but it is not clear how RIDE took this feedback into consideration.
	
	   o Peers would like to understand the assumptions being made in consolidating subgroups. The relationships demonstrated in simple correlations are not sufficient evidence to justify the appropriateness of combining these groups.
	
	   o Peers expect that RIDE investigated various alternatives for holding as many schools as possible accountable for the success of subgroups. An explanation of which alternatives were evaluated and why they were rejected in favor of the consolidated subgroups would help peers understand RIDE's strategy.

Technical Assistance Suggestions	• Analyze the relationship between the Composite Index Score and all student subgroups performance to verify that schools with the greatest gaps are being classified accurately.
	
	• Analyze consolidated subgroups against disaggregated subgroup performance for each school across multiple years to ensure that specific subgroup performance is not masked by combining scores.
	
	• Eliminate the use of a white student performance reference group; rather, hold all subgroups, including whites, to a specific uniform performance standard.
	
	• There are multiple alternative possibilities for capturing more schools:
	
	   o Reduce "n- size" to a number (such as 10) that would capture a larger number of schools with the noted subgroups.
	
	   o Utilize an "all students" reference subgroup rather than the white student performance reference group.
	
	   o Create an additional bottom 25% consolidated subgroup.
	
	   o Average years of subgroups' performance for trending purposes.

Response Component	*Peer Panel Response*
Technical Assistance Suggestions	• RIDE should provide an analysis of the schools and subgroups that would be identified under their current model of consolidating subgroups, compared with other potential models provided as technical assistance earlier (*e.g.*, reduced "n-size,"), and provide a demonstration that ensures they are using the best methodology to drive incentives and support. Peers note that there will likely be a tradeoff in expanding the pool of captured schools that will impact the availability of resources. • Given the issues with conflating of race and poverty as well as disability and language minority status, peers recommend that RIDE should convene a technical advisory committee that includes diverse stakeholders with expertise in these areas to evaluate the issue of subgroup consolidation.

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

2.A.i.a Panel Response
Tally of Peer Responses: 5 Yes, 1 No

Response Component	*Peer Panel Response*
Rationale	• RIDE's proposed accountability system is intended to cut the proficiency gap in half by 2017 and is based on a weighted index system that includes reading and math achievement, proficiency, progress toward the AMO, growth, subgroup gaps, and high school graduation data. Proficiency and closing gaps are weighted more in the index system in alignment with RIDE's theory of action. Scores for each of these measures is divided into one of five performance levels. Reading and math points are averaged to calculate a school score. A composite index score is used to rank schools into one of six categories. Cut points are set to ensure that schools are on track to meet targets and schools losing ground are identified. The intent of the SEA is to prioritize schools that have missed gaps by wider margins. • As detailed in 2.A.i, peers are concerned about the inappropriate consolidation of subgroups and believe that until that issue is resolved, it is not possible to have confidence in the model for identifying schools for purposes of providing differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools.

Response Component	Peer Panel Response
Strengths	• The "n- size" for reporting subgroup accountability scores has been reduced from 45 to 20 and results in more schools held accountable for all student groups. • Schools must continue to meet 95% participation rate requirement. • Scores of students taking the alternate assessment are included in the accountability system. • RIDE has attempted to address the subgroup gap issues in multiple ways, though peers question the consolidation of subgroups and thus are not confident in the appropriateness of these methods • Growth will be measured in two ways: absolute growth (proficiency over time) and use of the Student Growth Percentile. Both will account for all students and consolidated subgroups. • Although there is no growth measure included for high school math or reading or the alternate assessment, these measures are included in proficiency, progress, and subgroup performance index scores. • The high school index offers an additional point for schools whose graduation rates are higher than their AMOs or that have rates higher than the state average. • Plotted classification distributions of composite index scores provided in the flexibility request (p. 59) place schools in one of six levels (Commended, Leading, Typical, Warning, Focus, or Priority) and are a good visual communication tool.
Weaknesses, issues, lack of clarity	• Peers are concerned about the proposed Performance Reference Group (PRG) and the cut points associated with the identified performance of the geographical reference groups. White students in the urban ring seem to have a lower bar, which also affects the bar for the consolidated subgroups. Using this type of methodology perpetuates different expectations for the same subgroup, based on the geographic location of the school.
Technical Assistance Suggestions	• See 2.A.i for technical assistance suggestions.

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

Response Component	Peer Panel Response
Rationale	• RIDE's proposal outlines an accountability system based on multiple measures intended to highlight gaps and a system of supports designed to target persistent gap issues that have the potential to result in closing achievement gaps for all students. Based on a rank order of the CIS, schools are classified in one of six designations: Commended, Leading, Typical, Warning, Focus, or Priority. In addition, schools with of absolute proficiency, gaps, growth, or graduation rates at low levels are classified as Warning regardless of the CIS. RIDE will classify 50 schools as Warning schools in need of supports. RIDE proposes to provide a systematic approach to support schools with differentiated recognition and support systems to strengthen LEA and school capacity through targeting interventions, external support, training, professional development based on data. However, peers have concerns about RIDE's proposed methodology to identify subgroup needs in that the system will not lead to targeted differentiation of incentives and supports in the proposed consolidated subgroups.
Strengths	• RIDE includes reflections from previous experiences to support their plan in emphasizing a concentrated effort on appropriate diagnosis of issues with frequent monitoring of interventions. • There is a differentiated system of support for LEAs and schools based on plan type classification. • RIDE will complete a diagnostic screening of the LEA functions to allocate resources, plan, and differentiate support to schools to assist LEAs with Priority schools. • RIDE has a comprehensive RtI model of interventions that differentiates the types of actions schools must implement based on their classification. • RIDE will be analyzing school-level data to determine the needs of students.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• Six levels are indicated in the proposal (Commended, Leading, Typical, Warning, Focus, or Priority) with differentiated recognition and support systems. Peers were not certain why Table 2, Attachment 9only shows Reward, Priority, Focus schools. Note: p. 49- RIDE states schools will be placed in one of 5 levels, which is inconsistent with the aforementioned levels.
Technical Assistance Suggestions	• See 2.A.i for technical assistance suggestions.

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

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

2.A.ii Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

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

    b.   Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?

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

2.A.ii.b PANEL RESPONSE
☒ Not applicable because the SEA selected 2.A, Option A
Tally of Peer Responses: NA

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

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: NA

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

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

Response Component	Peer Panel Response
Rationale	• RIDE provided a reasonable rationale (the rank-ordering from their index system) that allows for the selection of both high-progress and highest-performing schools.
Strengths	• RIDE indicates that a majority of schools selected under their methodology have either closed the gap or have made the strongest gains in closing achievement gaps (p. 66).
Weaknesses, issues, lack of clarity	• Peers noted concerns regarding the lack of a safeguard for excluding schools with low-performing subgroups from being identified as reward schools. Specifically, the concern is with the combined subgroups and whether this would impact the proper identification of highest-performing and high-progress schools; *i.e.*, that a school could have a subgroup with significant gaps that are not closing. For example, if the Minority/Poverty combined subgroup includes high performers that mask the performance of low performers in that combined subgroup, that school might still be identified as a top-performing school.
Technical Assistance Suggestions	• RIDE should include safeguards so that a school with low-performing individual subgroups with gaps that are not closing over time would not be able to be identified as a reward school.

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

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

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

2.C.iii PANEL RESPONSE
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE proposes identifying a high performing subset of schools classified as Leading schools that include 15% of the highest performing schools. RIDE proposes the continuing use of a traditional system of recognition for Commended schools that includes public recognition (e.g. media coverage, awards ceremonies, inclusion in a state study of practices, etc.)
Strengths	• Metrics indicate that the majority of these schools have either closed the gap or have made some of the strongest gains in closing achievement gaps.
Weaknesses, issues, lack of clarity	• No evidence was provided that RIDE consulted with LEAs and schools to design the recognition.
Technical Assistance Suggestions	• None provided.

2.D   Priority Schools

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

2.D.iii   Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?

a.   Do the SEA's interventions include all of the following?

(i)   providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;

(ii)   ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;

(iii)   redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;

(iv)   strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;

(v)   using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;

(vi)   establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and

(vii)   providing ongoing mechanisms for family and community engagement?

2.D.iii.a (including questions (i)-(vii)) Panel Response
Tally of Peer Responses: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	• RIDE's proposal describes a model of tiered interventions aligned with the turnaround principles that include specific interventions for schools to implement, based on designation and a comprehensive diagnostic assessment by RIDE. RIDE will conduct a review of LEA and school leadership functions, based upon a defined matrix, to determine greatest weakness and to inform selection of a model and interventions. LEAs can select one of three models for priority and focus schools; Closure, Restart, or Flex model. Both the Restart and the Flex model require core strategies and the Flex model requires no less than 9 researched based strategies be implemented across three years.
Strengths	• RtI tools included in Core strategies ensure a focus on students with achievement gaps • Specific interventions to address students with disabilities and English Learners are required when gaps with these subpopulations exist or persist. • RIDE requires a 6 month planning process followed by a rigorous implementation timeline. • Of the three options, the Closure and Restart models are directly aligned with the turnaround principles.
Weaknesses, issues, lack of clarity	• Only two of the eight schools identified as priority were previously identified as persistently low achieving. Although the CIS was approximately 7 points in spread (from 22 to 28.83), greater differences are noted in the other metrics. Math proficiency ranges from 2-31% and reading from 31-47%. Gaps range from 37 to 75 percentage point gaps. RIDE should explain such a large variation in percentage points in gap ranges. • There was no explanation of how RIDE determined the number of interventions that a priority school must adopt. • It is unclear how LEAs that choose the Flex model (and pick the individual components for it) will ensure that all seven principles are addressed, since schools can choose options that do not cover the gamut of the seven principles.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Provide evidence that LEAs that choose the Flex model (and pick the individual components for it) will ensure that all seven principles are addressed, since schools can choose options that do not cover the gamut of the seven principles. • Peers are concerned that a "scattershot" approach is being used with interventions, i.e., rather than selecting a sufficient number of appropriately targeted interventions, schools are being required to select a large and seemingly arbitrary number of interventions. RIDE should consider requiring priority and focus schools to select interventions based on need, as determined through the diagnostic screen, rather than requiring an arbitrary number of interventions. • Describe how monitoring will be done to ensure that the interventions chosen are aligned with school needs.

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: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	• RIDE's proposal outlines an extensive, three-stage intervention system of support that has the potential to result in improved instruction, teaching and leading, improvement in student achievement, services for students with disabilities and English Learners, and graduation rates. Each LEA must work with the school to select the model to be used (Closure, Restart, Flex) that the state Commissioner must approve. LEAs with priority schools are required to conduct a diagnostic needs assessment and submit a detailed plan for review and approval by the State Board of Education. LEAs that choose the Restart and Flex models must implement intervention strategies, defined by RIDE, that are designed to address specific gap areas. • The flexibility of choice of interventions (Flex model) in the worst-performing schools is problematic in the eyes of most peers. A more constrained and structured approach seems called for in schools where there is persistent low performance. Such schools may need more support and guidance to select, implement and monitor the interventions most likely to improve student achievement.
Strengths	• A comprehensive approach is presented, including specific expectations for activities and criteria related to school leadership, operating flexibility, effective teachers, additional learning time, instructional programs, data use, school culture, Problem-Solving and Response-to-Intervention, family and community engagement, and a specified oversight and monitoring process (pp. 99-107). • RIDE presents an instructional improvement system that has the potential to link fine-grained diagnosis of learning challenges to effective interventions.. • RIDE has shown some attention to aligning the needs of subgroups within schools with appropriate interventions. Professional development is tied to decreasing subgroup gaps.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• RIDE has not provided evidence that all of the proposed interventions have empirical research to support that they will result in dramatic changes. • The Flex model does not provide assurance that schools will have to select from appropriate interventions that work on the areas of greatest need for subgroups in a particular school. For example, an oversight process is needed to ensure that it is <u>not</u> possible for a school with an identified primary area of need to select strategies in intervention Levels II and III that are not directly associated with that need, or are already being implemented in that school but have not resulted in improved outcomes. • While there may be instances where school closure is necessary, some peers have expressed the concern that the closure model is an extreme choice after only 6 months of planning.
Technical Assistance Suggestions	• Provide empirical research to support that the interventions shown on page 80 are effective in increasing achievement. • Ensure that the oversight process will ensure the appropriateness of interventions selected under the Flex model.

c. _Note to Peers: Staff will review 2.D.iii.c_

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

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

2.D.iv Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE's proposal describes a timeline showing 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 2013-2014 school year and are reasonable and likely to result in implementation of the interventions in these schools. No concentration of schools in later years is evident.
Strengths	• RIDE offers schools early implementation to stagger implementation of strategies. • RIDE requires quarterly progress monitoring.
Weaknesses, issues, lack of clarity	• Peers question whether the choices that schools make will be meaningful enough to lead to significant improvement in outcomes for all students.
Technical Assistance Suggestions	• RIDE should ensure monitoring by the SEA and LEA of the selection and implementation of interventions throughout the timeline of implementation.

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

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

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

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE's priority exit criteria ensures schools have made significant progress toward achieving AMOs and in implementation of interventions, leading indicators, and student outcomes including achievement, graduation rates, and students exiting English language programming.

Response Component	Peer Panel Response
Strengths	• Exit criteria are comprehensive and include meeting both performance targets for three years of implementation as well as AMOs for two consecutive years or shifting to the typical category for two years based on composite index. • RIDE indicates that the majority of its resources will be dedicated to intensive quarterly progress monitoring that will be maintained through stage two of implementation (year 2 & 3). • Focus schools may be accelerated to priority status.
Weaknesses, issues, lack of clarity	• First year priority schools are classified as Rising and Caution status based upon performance. Page 89 states Caution schools will be at risk for more intensive state intervention as authorized under Rhode Island General Law. RIDE does not clearly define "intensive state interventions" or how it will determine which schools will require these supports. • RIDE does not specify what supports and monitoring are available for priority schools that exit.
Technical Assistance Suggestions	• Provide clarification about what intensive state interventions are and how is it determined that a school will require these supports. • RIDE should clarify what process RIDE has in place to monitor the continued improvement of schools that exit 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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• The SEA has indicated that it will use the same methodology (index) for focus schools as it will for priority schools, though the difference is the number of required interventions. However, peers have the same concerns previously mentioned for priority schools regarding how focus schools are identified.
Strengths	• Focus schools must also identify a model (Closure, Restart, or Flex) and select from a menu of interventions based on all three tiers.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It was unclear how RIDE determines the number of interventions required for focus schools. (p. 93). • As noted previously, while combining subgroups may appear reasonable to the SEA as a way to increase school accountability for gaps, the CPS may mask specific group issues or needs that are persistent in one of the specific combined groups. It is unclear how RIDE will differentiate and assign resources. The current system as proposed may lead to the inappropriate identification of schools. Even though schools may use their own data to develop plans, the intensity of support may not be available in areas where needs are the greatest. • Peers have concerns about RIDE's capacity to address subgroup needs in that the system will not lead to targeted differentiation of incentives and supports through the proposed combined subgroup.
Technical Assistance Suggestions	• RIDE must demonstrate that it has a justifiable method for identifying schools with subgroups that allow for the identification of most schools with subgroups but without the unintended consequences described in 2.A.i.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE's proposal meets the 2012-2013 timelines for intervention. RIDE describes the focus schools as having persistent gaps and provides tiers of intervention from which schools can select, based on identified needs.
Strengths	• Focus schools must select Closure, Restart, or the Flex model with prescribed interventions and a menu of additional interventions based on a needs assessment. • Schools with gaps for students with disabilities and English Learners must select interventions that specifically address the needs of the subpopulation.
Weaknesses, issues, lack of clarity	• Peers are concerned that RIDE determines the difference in appropriate action between priority and focus schools (p. 93) as being the number of interventions required, rather than the kinds of interventions.
Technical Assistance Suggestions	• Provide clarification about what the intensive state interventions are and how it is determined that a school will require these supports. • RIDE should provide a rationale for defining the interventions for focus schools quantitatively. Peers believe that interventions should be selected based on targeting school needs rather than to satisfy a seemingly arbitrary requirement for a specific number of interventions.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE plans to monitor schools' progress starting in year 2013-2014 and classify schools for further intervention as needed. RIDE will have exit criteria requiring that that schools show they have made significant progress for at least three years. Schools will be monitored bi-annually and identified as Rising/Focus to indicate sufficient improvement. Schools identified as Focus/Caution for two years will be moved to Priority status.
Strengths	• Schools must have reached 80% of their targets in implementation, leading, and student outcome targets and 90% of AMOs for two consecutive years, and a substantial shift in index scores that move them into 'typical' status.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

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: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	• RIDE includes non-Title I schools in calculations and has a classification for low performing schools that triggers a diagnostic screen, mandatory selection of interventions and development of a plan.
Strengths	• Schools with performance between 38.5 and 50 are flagged as Warning schools. • Schools are provided the flexibility of choosing from the menu of interventions in the Flex model or selecting their own empirically-proven strategy. • The Academy of Transformative Leadership is available to all Title I schools (p. 102).
Weaknesses, issues, lack of clarity	• There are 50 schools that RIDE has identified at this time. Peers noted concern regarding whether the SEA has the resources to provide the level of support it has set forth in its proposal. • It is unclear whether RIDE is using the AMOs to drive incentives and supports in Warning schools and other Title I schools. • It is unclear how RIDE will ensure the implementation of the additional intervention strategies required of Warning schools and other Title I schools.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• RIDE has created a comprehensive system of support and has demonstrated commitment in this proposal to working with all schools to ensure that achievement gaps are closing. However, RIDE should indicate how it will use resources to support the different levels of schools and LEAs. • Provide clarification of whether the "low levels of performance" (p. 101) are based on AMO performance of subgroups.

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

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

Response Component	Peer Panel Response
Rationale	• RIDE has a process for non-Title I schools who have been identified as lower performing to select from a menu of interventions or select an empirically-proven intervention that is likely to lead to improved instruction. However, RIDE does not elaborate upon the incentives and supports that will be provided to Warning schools and other Title I schools.
Strengths	• Schools categorized as Warning must adopt the core interventions plus additional Tier II interventions based on modified plan. • RIDE completes the diagnostic evaluation with the expectation that the LEA and the school select the appropriate models and interventions and the LEA monitors the schools.
Weaknesses, issues, lack of clarity	• It is unclear what requirements RIDE has that LEAs monitor the implementation of interventions in Warning schools and other Title I schools and work with schools to shift strategies, if needed. • RIDE does not address how it will assure that these schools increase the quality of instruction for all students, including English Learners and students with disabilities.

Response Component	*Peer Panel Response*
Technical Assistance Suggestions	• RIDE should provide information on how it will provide incentives and supports to the Warning schools and other Title I schools to ensure that these schools will increase the quality of instruction for all students, including English Learners and students with disabilities.

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

2.G   Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

   i.   Is the SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

   ➢ *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*

   ii.   Is the SEA's process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

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

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

Response Component	Peer Panel Response
Rationale	• RIDE described a comprehensive process that clarifies the roles and responsibilities of RIDE and its LEAs in the accountability process. However, it is unclear if RIDE has the resources to carry out supports as outlined in the proposal.
Strengths	• RIDE described a comprehensive process that clarifies the roles and responsibilities of the RIDE and its LEAs in the accountability process. • Throughout its request, RIDE is providing clear expectations to close gaps for LEAs and schools as well as indicating that resources will be provided to support LEAs in meeting requirements. • RIDE is planning to create a data system to provide schools with a more complete set of information. • The SEA has established an integrated set of strategies around capacity building and efficient use of resources. The SEA acknowledges resource constraints and is seeking ways to reduce the burden on administrators, which suggests a desire to have professionals focus on the work of improving student achievement instead of managing data.
Weaknesses, issues, lack of clarity	• Most of the actions described in RIDE's proposal are not currently in place and will require resources. It is unclear what plans RIDE has to strengthen its capacity to implement the strategies within this proposal.
Technical Assistance Suggestions	• None provided.

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: 0Yes, 6 No

Response Component	Peer Panel Response
Rationale	• A cross-cutting theme is that peers do not believe that the method by which RIDE has identified consolidated subgroups is educationally sound, and may sustain long-standing stereotypes. As a result the identified interventions may not be correctly targeted at the LEA or school level. • While it is notable for RIDE to seek to capture more schools through consolidated subgroups, this particular approach to identifying more schools is problematic. • Detailed comments are given in 2.A.i.

Response Component	*Peer Panel Response*
Strengths	• RIDE's plan, based on RtI, includes a comprehensive menu of interventions that reinforce and extend the turnaround principles and reinforce attention toward groups that are not making progress, including students with disabilities and English Learners. • Based on a diagnostic assessment completed by RIDE, LEAs are expected to work with priority and focus schools to identify interventions, develop, implement, and monitor the plan. • The flexibility request appears to hold together well, provides significant detail, and includes data analysis in its decision-making process. • Peers commend RIDE for reviewing what did not work under NCLB and developing its plans in order to better differentiate their plans according to particular school needs. • RIDE described a comprehensive process that clarifies roles and responsibilities of the RIDE and its LEAs in the accountability process. • RIDE requires quarterly progress monitoring.

Weaknesses, issues, lack of clarity	• Two key weaknesses have been identified that, if addressed, would provide peers with greater confidence in the ability of RIDE to ensure a fair, valid, and accurate process for improving student outcomes through the accountability model:
	
	    o RIDE must address the subgroup consolidation issue which has been described at length.
	
	    o RIDE must provide a more convincing rationale for how interventions are selected (number, appropriateness, and targeting of interventions).

Technical Assistance Suggestions	• Address two key weaknesses described above. Technical assistance suggestions are provided throughout in earlier sections.

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: NA

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

Response Component	Peer Panel Response
Rationale	NA
Strengths	NA
Weaknesses, issues, lack of clarity	NA
Technical Assistance Suggestions	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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• Guidelines adopted meet all the requirements set out by USDOE and include growth and improvement as significant rationale for the system, thus giving assurance that instructional quality will be a focus. • RIDE is positioned to verify that all LEAs meet these requirements
Strengths	• Existing RTTT work supports these guidelines. • Guidelines meet all the requirements for evaluation system outlined by USDOE. • RIDE appears to have developed its own system, but also allows LEAs to create their own system, subject to SEA approval.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

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

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

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

Response Component	Peer Panel Response
Rationale	• RIDE adequately involved stakeholders in the initial development of many aspects of the system – standards, teaching standards, code of professional responsibility, etc. and thus has established teacher voice in the process throughout.
Strengths	• Input and involvement from teachers, principals and teacher's union was part of the development of the Rhode Island Educator Evaluation Standards (p. 112) • Rhode Island Advisory Committee for Educator Evaluation Systems (ACEES) includes teachers, principals, other educators and union representatives.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

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 is an appropriate focus on development and support of teachers as the key function of these systems. • One of the six criteria for the Rhode Island Educator Evaluation Standards, listed on p. 113, is for the system to "provide opportunities for professional growth and improvement." Presumably, when professionals are growing and improving, their instruction will be improving as well, and the result will be improvements in student achievement.
Strengths	• SEA has developed standards for Educator Evaluation that ensure that "all educators will receive clear, actionable feedback in order to improve, and any educator who receives a rating of Developing or Ineffective will receive more targeted support to accelerate improvement. These educators will work with their evaluator to develop a detailed Improvement Plan with clear objectives, benchmarks, and timelines and to identify an improvement team to assist with their development" (p. 117). • SEA is using Student Learning Objectives to focus on teachers who work with students with disabilities and is starting similar work with those who work with English Learners. • RIDE will produce reports on the efficacy of professional development providers.
Weaknesses, issues, lack of clarity	• No mention of how teachers with ratings higher than "Developing" will also receive opportunities for support and professional growth. • The SEA has presented little information on how professional development plans will be developed, how performance data will be used in their development, and how they will be designed to focus on particular teacher needs.
Technical Assistance Suggestions	• RIDE should further explain the support and development targeted to educators rated higher than "developing."

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• Standards adopted mandate use of four levels (highly effective, effective, developing and ineffective). • Standards also mandate that LEAs base evaluation of educator effectiveness "primarily on evidence of impact on student growth and academic achievement" (p. 113).
Strengths	• Four performance levels are clearly mandated. • The most significant factor in the evaluation system is impact on student outcomes, and RIDE is including student learning objectives (SLOs) in the system to address non-tested areas and provide additional student growth information in tested subjects and grades as well.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• None provided.

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: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	• The SEA has a process for assessing validity in student growth, and is reviewing its educator-evaluation systems (pp. 129-130). • RIDE indicates that three types of measures (Professional Practice; Professional Responsibilities; and, Student Learning) are used in its educator evaluation system. The state indicates in its request (p. 118) that the measures of Professional Practice, such as rubrics, can be validly applied in a number of settings. The state's request indicates that there are rubrics for Professional Responsibilities posted on its website. The evaluation of Student Learning occurs, according to RIDE, from Student Learning Objectives, based on Rhode Island content standards or those from national organizations.
Strengths	• Developing the Rhode Island Growth Model, providing state-level guidance and resources (in areas like teacher/student linkage and benchmark measures for student growth). • RIDE indicates that it will collect data to determine validity.
Weaknesses, issues, lack of clarity	• Proposal mentions the use of a Technical Advisory Committee for assistance with the Rhode Island model, but not much detail provided on validating the measures being used. • No data to support RIDE's assertion of the validity of the Professional Practice and Professional Responsibilities rubrics is provided. It is unclear how the "growth" measures included in the CIS and accomplishment of the Student Learning Objectives are related to one another, since these Student Learning Objectives are set and measured locally (perhaps by individual teachers). Although the same Student Learning Objectives are used in each school, each student may have a different starting point (p. 120). • Some peers felt it was unclear how the use of the growth metric informs specific classroom and teacher instruction if it is based on a statewide academic peer model.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• RIDE needs to collect and report evidence on the validity of each type of measures used in its educator evaluation system, especially how the student achievement data used for <u>educator evaluation</u> is related to the use of the same (and different) information used for <u>school accountability</u>.

(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

Response Component	Peer Panel Response
Rationale	• RIDE has indicated that, in addition to measuring students' achievement of the Student Learning Objectives, the state will use a growth model for increases in student achievement on the NECAP-assessed grades. Two years of growth is to be used for educator evaluation.
Strengths	• SEA developing the Rhode Island Growth Model and is defining, using Student Growth Percentiles, the approach for measuring growth on statewide assessments. • Established a Technical Advisory Committee of experts to help guide the development of the growth model. • RIDE is planning to use a student growth percentile model in which a teacher's student's growth is compared to that of other students in the state (p. 123). RIDE indicates that it has field tested the model in four school districts and is in the process of gradually implementing it (pp. 124-125).
Weaknesses, issues, lack of clarity	• Little information on the details of the use of the growth model in evaluating educators is provided in the application.
Technical Assistance Suggestions	• RIDE should consider using a three-year rolling average of growth scores for teacher evaluation purposes. Research suggests that this would considerably reduce volatility along with Type I and Type II errors.

(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: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	• RIDE is working on the development of Student Learning Objectives (SLOs) and potentially other tools to measure growth in non state-tested areas, but more details are needed about how resulting data will be collected in a systematic way and how it will be used for evaluating educators. • The use of SLOs – and locally determined measures of these – means that RIDE does not specify the measures of student growth that LEAs must use.
Strengths	• RIDE is doing a lot of work with educators on process of developing and using SLOs. • LEAs have the flexibility to select the SLOs and how they are measured. • The RIDE model includes the potential for common objectives and assessments across teachers, providing an opportunity for professional development.
Weaknesses, issues, lack of clarity	• Beyond providing resources around SLOs, there does not appear to be a stated approach or clear guidance on how LEAs should be using SLOs in a consistent way as part of an evaluation process (or to measure growth for those non-tested subjects/grades). It is our understanding that there are documents detailing some of these documents on RIDE's website; their inclusion would strengthen the request. • This work is not being done at the LEA level. Moving from school to district level SLO processes would ensure greater comparability across teachers within a district.
Technical Assistance Suggestions	• RIDE needs a long-term plan that gets the State closer to valid measures, perhaps by working in a consortium with other States (*e.g.*, other RTTT States).

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

Response Component	Peer Panel Response
Rationale	• RIDE's application indicates that educator evaluation standards created in the state call for such evaluation to occur annually (p. 117).
Strengths	• Standards mandate annual evaluation of all educators (p.113).
Weaknesses, issues, lack of clarity	• The actual implementation of the state-developed or state-approved local evaluation systems are not described in much detail. Thus, the peers must rely on statements in different parts of the request to understand how often educators are being evaluated.
Technical Assistance Suggestions	• It would be helpful in evaluating this component of the state's request if the RIDE's narrative followed the sub-questions included in the waiver application, and that the narrative specifically addressed this sub-question.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• SEA, through standards developed and through previous work on professional teaching standards development, etc., is appropriately focused on making good use of the feedback provided in these systems for professional development and support • RIDE indicates in its request that the evaluation system developed by the state or locally-developed systems approved by the state will provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development.
Strengths	• SEA has developed standards for Educator Evaluation that ensure that "all educators will receive clear, actionable feedback in order to improve, and any educator who receives a rating of Developing or Ineffective will receive more targeted support to accelerate improvement. These educators will work with their evaluator to develop a detailed Improvement Plan with clear objectives, benchmarks, and timelines and to identify an improvement team to assist with their development." p. 117).
Weaknesses, issues, lack of clarity	• RIDE has presented little information on professional development plans and the degree to which they will be designed to focus on particular teacher's needs.
Technical Assistance Suggestions	• RIDE should offer more specifics on how professional development will be prescribed based on evaluations, especially regarding subgroup educational needs.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• RIDE indicates that the evaluations of educational personnel will be used to inform personnel decisions (*e.g.*, renewal and tenure decisions) about the educators.
Strengths	• Educator evaluation standards call for evaluation system to serve "as the basis for all state and local human-resource management decisions — including certification, selection, tenure, professional development, support for both individual and groups of educators, placement, compensation, promotion, and retention" (p. 113). • Peers applaud RIDE's goal of preventing student's exposure to multiple years of ineffective teachers, based on the potential impact on student outcomes (p. 136).
Weaknesses, issues, lack of clarity	• While both impressive and aspirational, the goal of preventing student exposure to ineffective teachers after one year will only be effective if actionable. For schools with a concentration of ineffective teachers, the request did not clearly state how the SEA will increase access to effective teachers to fulfill the needs of this proposed requirement. RIDE does not lay out a process for attracting effective teachers into these schools.
Technical Assistance Suggestions	• RIDE should expand upon plans to address the overall effectiveness of the teaching force and how it will facilitate, through incentives, access to effective and highly effective teachers in high-need schools. • More specifics about the processes to be followed to establish the manner in which evaluation results are used in personnel decisions would be helpful for peers to determine that the state is on a path to create the resources LEAs will need to implement this successfully.

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

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

➢ *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*

➢ *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*

➢ *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*

➢ *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems?*

➢ *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013−2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014−2015 school year; or (2) implementing these systems no later than the 2013−2014 school year?*

➢ *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*

➢ *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*

➢ *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

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

Response Component	Peer Panel Response
Rationale	• The plan seems reasonably constructed to lead to high-quality local teacher and principal evaluation and support systems, but needs more information about certain aspects, particularly how validity of measures will be determined.
Strengths	• For those LEAs wishing to develop their own model and not adopt Rhode Island Model, there is an SEA review process, with rubric based on quality of design, fairness/accuracy of system, stakeholder engagement in development, plans for using information in decisions, and how system is linked to professional development. • The SEA review process ensures that validity of measures is addressed by LEAs proposing system. • Because the SEA is using current year for gradual implementation, there is reasonable certainty that all LEAs will fully implement no later than 2013-14 (p. 125). • Sequencing of this work makes sense, although it seems there is still a lot of work to do on using SLOs with teachers. • Statewide data systems to assist with the student growth aspect and the development of a state-wide model for possible adoption indicate support for LEAs in developing and implementing these evaluation and support systems. • Feedback systems are set up through an advisory committee and ongoing outreach, and with so many schools/LEAs doing gradual implementation, the SEA is positioned to learn a great deal for full implementation in following years.

Response Component	*Peer Panel Response*
Weaknesses, issues, lack of clarity	• Beyond involvement of teachers and principals as part of the review criteria, there is no stated process to ensure LEAs pilot and implement with similar involvement – beyond statement that SEA plans to audit LEA systems.
Technical Assistance Suggestions	• RIDE should provide a detailed plan regarding how they will solicit and utilize feedback during the process of piloting and implementation. • Include feedback on the evaluation system standards so stakeholders can see that RIDE intends to collect and incorporate feedback.

Principle 3 Overall Review

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

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

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• It is likely that RIDE's plan for developing its educator evaluation system will permit the state to create a comprehensive, coherent, and quality system to improve the quality of educators in the state.
Strengths	• Standards are very clear, as is the SEA's work on developing a growth model. • Timelines all make sense and are appropriate for effective piloting and implementation. • SEA review process is clear as well. • Peers were pleased that RIDE's evaluation system allowed sufficient flexibility for districts such as those working with the teacher unions to develop parallel evaluation systems and thus have input into Rhode Island's efforts to improve teaching and learning. • Peers applaud RIDE's goal of preventing student's exposure to multiple years of ineffective teachers, based on the potential impact on student outcomes (p.136). • The SEA has identified a multi-part evaluation plan, is working with local educators and professional organizations to set the plans in place, and is committed to a gradual roll-out of the evaluation system with ample input from educators.
Weaknesses, issues, lack of clarity	• Additional details about SLOs and how their validity will be determined is needed. In addition, more information about how SLOs can provide guidance for teachers' professional growth while also improving student outcomes would be welcomed.
Technical Assistance Suggestions	• RIDE needs to collect and report evidence on the validity of each of the three types of measures used in its educator evaluation system, especially how the student achievement data used for evaluation is related to the use of the same (and different) information used for school accountability.

Overall Request Evaluation

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

Overall Request Evaluation Panel Response

Response Component	*Peer Panel Response*
Rationale	• There are many commendable goals in RIDE's accountability system, and it is quite clear that RIDE's priority is serving the needs of its students and those who teach and support them. RIDE has built in efforts to ensure that as many schools as possible are held accountable for the performance of all students, including English Learners and students with disabilities. RIDE is committed to building a highly effective teaching force so that students will grow to full capacity. However, it is this same determination to serve students well that has led to some decisions that may hinder rather help students. In particular, RIDE must satisfactorily address the issue of subgroup consolidation and the "quantity vs. targeting" of interventions to the lowest performing schools. There are many strengths in the system, but until these overarching issues are addressed, the goals of the system to do what it is designed to do—help all students achieve at high levels—will not be fully realized.
Strengths	• Strengths include RIDE's teacher evaluation system which combines multiple measures for identifying effectiveness and provides opportunities for professional growth. In addition, the adoption of CCSS and the efforts being made to ensure that teachers can efficiently incorporate them into their curriculum and assessments is noteworthy. Furthermore, defined expectations for school leadership, flexibility for school-based decision-making, options for including additional learning time, the use of RtI strategies, and a focus on family and community engagement, are all positives. The development of a statewide data system that will link various types of teacher, student, and school data will benefit those who are working to better understand and support the needs of students, teachers, and principals in schools, LEAs, and throughout the state.
Weaknesses, issues, lack of clarity	• There are a number of weaknesses in the system, but most can be addressed. The two issues that should be prioritized for resolution are the consolidated subgroup methodology and the "quantity vs. targeted" interventions for underperforming schools. Valid, targeted interventions are needed rather than a system that perpetuates the myth that low-performing schools need lots of initiatives while higher achieving schools do not.
Technical Assistance Suggestions	• Reviewers have made a number of technical assistance suggestions that are provided throughout.