ESEA Flexibility

Peer Panel Notes

State Request: Indiana

Date: 12/9/2011

Note: These peer comments reflect the views of the seven peers that comprised the panel that reviewed the SEA's initial submission as well as any additional materials provided by the SEA prior to and during the December 5–9, 2011 on-site peer review. Taking these comments into consideration, the U.S. Department of Education provided feedback to the SEA about aspects of the SEA's ESEA flexibility request that needed additional development or clarification. These peer notes do not reflect the peers' views on any materials, clarifications, or modifications received from the SEA following the peer review. Moreover, although the peer notes inform the Secretary's consideration of each SEA's request, the Secretary makes the final decision whether to grant an SEA's request for ESEA flexibility. For both of these reasons, these peer notes may not align with the determination made by the Secretary.

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

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

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

CONSULTATION QUESTION 1 PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	Indiana described its vision for education reform and has established a communication network and infrastructure to engage and consult with stakeholders. While it is evident that the state has engaged a number of educators, including teachers, about the reform efforts occurring in the state, it was not evident that the state had meaningful engagement with teachers regarding the ESEA flexibility waiver request.
Strengths	Indiana noted, in the waiver request, that they hosted a series of teacher forums in eight cities throughout the state which provided an opportunity for questions and answers for educators. In addition, the SEA created a web-based survey to collect feedback.
Weaknesses, issues, lack of clarity	The panel believes that the consultation with teachers was insufficient. During a call with the SEA, staff noted that they spoke to teachers. However, they did not have separate conversations with their teacher unions. In the survey comments that were sent with the request several respondents noted that they did not have enough time to review the waiver. An email included with the waiver request indicates that the notice of survey went out 3 days before Flexibility Request was due to the U.S. Department of Education. Therefore, the state did not have adequate time to receive or incorporate feedback from stakeholders.
Technical Assistance Suggestions	

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

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

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

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

CONSULTATION QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The SEA did not have meaningful engagement 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.
Strengths	No text
Weaknesses, issues, lack of clarity	While the SEA included a list of grassroots-oriented groups that they frequently tap into, only two non-educator groups, ARC and Stand for Children, were identified as being consulted on the actual waiver request.
Technical Assistance Suggestions	

Overview

Note to Peers: Staff will review Questions 1 and 3

2. Does the SEA's overview sufficiently explain the SEA's comprehensive approach to implementing the waivers and principles and describe the Sea's strategy for ensuring that this approach is coherent?

OVERVIEW QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The overview does not sufficiently explain the SEA's comprehensive approach to implementing the waivers and principles
Strengths	Indiana addresses their reform agenda, "Putting Kids First," which it describes as a comprehensive legislative package which is focused on teacher quality and flexibility coupled with a marked expansion in educational options for students and families. The SEA notes that the reforms align with the four waiver principles.
Weaknesses, issues, lack of clarity	The overview was vague and does not sufficiently explain Indiana's comprehensive approach. Specifically, the overview did not address anything related to Principle 1.
Technical Assistance Suggestions	

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   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, and likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

A high-quality plan will likely include activities related to the following questions or an explanation if one or more of the activities is not included. For the activities below that the SEA selects, will the results be used to inform the intended outcome?

➢ *Does the SEA intend to analyze the extent of alignment between the State's current content standards and the college- and career-ready standards to determine similarities and differences between those two sets of standards? If so, will the results be used to inform the transition to college- and career-ready standards?*

➢ *Does the SEA intend to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards and to ensure that English Learners will be able to access the college- and career-ready standards? If so, will the results be used to inform revision of the ELP standards and support English Learners in accessing the college- and career-ready standards?*

➢ *Does the SEA intend to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards? If so, will the results be used to support students with disabilities in accessing the college- and career-ready standards on the same schedule as all students?*

➢ *Does the SEA intend to conduct outreach on and dissemination of standards? If so, does the SEA's plan reach the appropriate stakeholders, including educators, administrators, families, and IHEs? Is it likely that the plan will result in all stakeholders increasing their awareness of the State's college- and career-ready standards?*

➢ *Does the SEA intend to provide professional development and other supports to prepare teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new standards? If so, will the planned professional development and supports prepare teachers to teach to the new standards, use instructional materials aligned with those standards, and use data on multiple measures of student performance (e.g., data from formative, benchmark, and summative assessments) to inform instruction?*

➢ *Does the SEA intend to provide professional development and supports to prepare principals to provide strong, supportive instructional leadership based on the new standards? If so, will this plan prepare principals to do so?*

➤ *Does the SEA propose to develop and disseminate high-quality instructional materials aligned with the new standards? If so, are the instructional materials designed (or will they be designed) to support the teaching and learning of all students, including English Learners, students with disabilities, and low-achieving students?*

➤ *Does the SEA plan to expand access to college-level courses or their prerequisites, dual enrollment courses, or accelerated learning opportunities? If so, will this plan lead to more students having access to courses that prepare them for college and a career?*

➤ *Does the SEA intend to work with the State's IHEs and other teacher and principal preparation programs, to better prepare*

    o *incoming teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new college- and career-ready standards; and*

    o *incoming principals to provide strong, supportive instructional leadership on teaching to the new standards?*

    If so, will the implementation of the plan likely improve the preparation of incoming teachers and principals?

➤ *Does the SEA plan to evaluate its current assessments and increase the rigor of those assessments and their alignment with college- and career-ready standards, in order to better prepare students and teachers for the new assessments through one or more of the following strategies:*

    o *Raising the State's academic achievement standards on its current assessments to ensure that the adjusted achievement standards reflect a level of postsecondary readiness, or are being increased over time to that level of rigor (e.g., the SEA might compare current achievement standards to a measure of postsecondary readiness by back-mapping from college entrance requirements or remediation rates, analyzing the relationship between proficient scores on the State assessments and the ACT or SAT scores accepted by most of the State's 4-year public IHEs, or conducting NAEP mapping studies)?*

    o *Augmenting or revising current State assessments by adding questions, removing questions, or varying formats in order to better align those assessments with college- and career-ready standards?*

    o *Implementing another strategy to increase the rigor of current assessments, such as using the "advanced" performance level on State assessments instead of the "proficient" performance level as the goal for individual student performance?*

    Is this activity likely to result in an increase in the rigor of the assessments and their alignment with college- and career-ready standards?

➤ *Does the SEA propose other activities in its transition plan? If so, is it likely that these activities will support the transition to and implementation of college- and career-ready standards?*

1.B PANEL RESPONSE *Tally of Peer Responses:* *3 Yes, 4 No*	
Rationale	The panel acknowledges that what Indiana has already done seems like a good start. However, a detailed comprehensive transition plan is not provided.
Strengths	The SEA has taken several steps to transition to and implement college- and career-ready standards statewide including: • A comprehensive approach to teacher preparation including reforming licensure standards to better align to Common Core State Standards (CCSS), creating an A-F system for preparation programs, and creating specific pedagogical standards for teachers of English Learners, students with disabilities, and low-achieving students by grade level. • The SEA has analyzed the alignment between the state's current content standards and the college-and career-ready standards to determine similarities and differences. • The state has conducted an analysis of the correspondence between the Indiana kindergarten English Language Proficiency (ELP) standards and the linguistic demands of the CCSS. • The state is in the process of designing a secondary literacy framework. • The state has partnered with the Curriculum Institute to conduct outreach and disseminate information about the CCSS and has started the implementation rollout with administrators and curriculum directors. To date 900 curriculum directors, district level administrators and building-level administrators have participated in professional development sessions. • The state is looking at its state assessment and adding "PARCC-like" items to its assessments.
Weaknesses, issues, lack of clarity	While the state has articulated some strategies to transition to and implement college-and career-ready standards, there is not a comprehensive and cohesive plan provided. Specifically, the state provides only limited information about: • The type of support that will be provided for principals and teachers. While it is apparent that the state is working with the Curriculum Institute to conduct regional workshops, it is not clear how information, tools and resources about the CCSS will reach teachers. Indiana stated during a call that a few specialists are currently in schools working on the CCSS. However, the state has not identified the infrastructure that is in place or will be put in place to ensure successful implementation of the CCSS. • There is not a clear transition plan articulated for English Learners to the new assessment of English Language Arts.
Technical Assistance Suggestions	

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 *Tally of Peer Responses:* NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 1.C, Option A or Option C*	

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:* 4 Yes, 3 No	
Rationale	The panel is split on whether or not the SEA can successfully transition to implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth because a comprehensive and coherent plan is not provided.
Strengths	- The SEA has analyzed the alignment between the State's current content standards and the college- and career-ready standards - The SEA intends to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards and to ensure that English Learners will be able to access the college- and career-ready standards. However, it is not clear if the results will be used to inform revision of the ELP standards and support English Learners in accessing the college- and career-ready standards. - During a call with staff from the SEA they noted that state statute requires all schools to offer two AP and two dual credit courses and the state has set-aside money for students to take the AP test. - The SEA intends to work with the State's IHEs and other teacher and principal preparation programs, to better prepare incoming teachers to teach to the new standards.
Weaknesses, issues, lack of clarity	- It is not evident that the SEA intends to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards. - The SEA has not detailed how it intends to conduct outreach on and dissemination of standards. While it has identified a number of regional meetings it is not apparent that the SEA's approach will reach the appropriate stakeholders, including educators, and families. - It is not clear that the SEA intends to provide professional development and other supports to prepare teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new standards. - There is no evidence that the SEA proposes to develop and disseminate high-quality instructional materials aligned with the new standards.
Technical Assistance Suggestions	The state should ensure that its contractor for the CCSS assessments carefully vets the teacher preparation content standards for true alignment with the CCSS.

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?

2.A.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The state has proposed a new accountability system that includes a grading system and a weak system of supports for schools. Neither the metrics of the grading system nor the supports for schools seem likely to improve achievement, close gaps and increase the quality of instruction.
Strengths	Even though the panel has serious reservations about the metrics in the system, the panel applauds Indiana's desire to create a school rating system that is easy for the public to understand. The new labeling system will use A to F letter grades to give parents, educators and students an easy to understand measure of student performance. This is an improvement from the old school labeling approach, which obscured differences among schools.
Weaknesses, issues, lack of clarity	- The state has created two "super subgroups" whose progress can generate extra points: one that includes the bottom 25% of students in every school, another that includes the top 75% of students in the school. The state argues that by awarding as many points for progress of the smaller group as for progress of the larger group, the framework will produce an energetic focus on the groups of students who are the required focus of the ESEA. However, the data provided by the state are unconvincing, especially since they focus on the composition of the bottom 25% of the state's students, rather than the combined bottom 25% of every school—certainly a very different group. - The way the state approaches the participation requirements is weaker than the federal requirement for participation. - The state contends that under this new system it will "cut the gap by 20% by 2020". That is an unambitious goal, but even so, the state provides no compelling evidence that the system is designed to reach it. - There is no focus on increasing graduation rates or college readiness rates for all groups of Indiana children.
Technical Assistance Suggestions	

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

2.A.i.a PANEL RESPONSE Tally of Peer Responses: *0 Yes, 7 No*	
Rationale	Because Indiana proposes to replace traditional subgroups with a bottom quartile group, instead of using the bottom quartile to supplement the required subgroups, this proposal fails the basic requirements of the principle.
Strengths	
Weaknesses, issues, lack of clarity	• Under the Indiana-proposed model a school could advance their letter grade by only improving the performance of the top 75% of students thus yielding little to no consequence for schools that have not improved the performance of the lowest performing "super subgroup". • Using only the lowest quartile masks the performance of the traditional ESEA subgroups. • Appears that exclusions for English Learners are inconsistent with federal requirements. • State graduation rate calculations allow for the exclusion of up to 3% of the students who are on the certificate of completion track; this seems inconsistent with federal criteria.
Technical Assistance Suggestions	

b. Do the SEA's differentiated recognition, accountability, and support system create incentives and provide support to close achievement gaps for all subgroups of students?

2.A.i.b PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The state's proposed accountability system does not include (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 with and progress of all subgroups. Because the proposal replaces rather than supplements traditional subgroups there is no attention to ESEA subgroups in this plan.
Strengths	
Weaknesses, issues, lack of clarity	Since the majority of students in the subgroups that are the focus of ESEA are not included in the bottom quartile group, the SEA has not adequately presented a differentiated recognition, accountability, and support system that creates incentives and provides support to close achievement gaps for all subgroups of students.
Technical Assistance Suggestions	

c. Does the SEA's differentiated recognition, accountability, and support system include interventions specifically focused on improving the performance of English Learners and students with disabilities?

2.A.i.c PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	There is no indication that the SEA's differentiated recognition, accountability, and support system would include interventions specifically focused on improving the performance of English Learners and students with disabilities.
Strengths	
Weaknesses, issues, lack of clarity	The information provided by the state leads the panel to conclude that some English Learners and students with disabilities would be systematically excluded from the proposed system in ways that are not permitted under federal law.
Technical Assistance Suggestions	

d. Did the SEA provide a plan that ensures that the system will be implemented in LEAs and schools no later than the 2012☐2013 school year?

2.A.i.d PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	The request outlines a timeline that indicates that the system will be implemented by the 2012-2013 school year.
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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. Did the SEA provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each additional assessment for all grades assessed?

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?

2.A.ii (INCLUDING QUESTIONS a AND b) PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 2.A, Option A*	

2.B   Set Ambitious but Achievable Annual Measurable Objectives

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

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

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 AND 2.B, OPTION C **(INCLUDING QUESTIONS i–iv)** **PANEL RESPONSE** Tally of Peer Responses: 0 Yes, 7 No	
Rationale	Indiana did not provide AMOs for the state, all LEAs, schools, and subgroups separately by subject.
Strengths	
Weaknesses, issues, lack of clarity	- The state has not established AMOs for ESEA subgroups. - The panel rejects the claim that this system is as ambitious as Options A or B; indeed, it appears that the state has chosen a less ambitious approach. - While the application argues that the use of letter grades provides public transparency—an idea with which the panel agrees in theory—the actual metrics used to construct those grades belie that claim. Schools with very different levels of proficiency can earn the same grades. Moreover, the fact that schools can advance their grades the required number of levels by moving the students in their top three quartiles means that there is no guarantee that bottom performers—much less students from the full range of Indiana's subgroups—will participate in those gains. - The state has only provided information about 3 year and 8 year targets, yet is required to identify annual targets.
Technical Assistance Suggestions	
☐ Not applicable because the SEA selected 2.B, Option A or Option B	

2.C   Reward Schools

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

2.C.iii   Did the SEA describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools?

> *Has the SEA provided a reasonable explanation of why its proposed recognition and, where applicable, rewards are likely to be considered meaningful by schools? For example, 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: 7 Yes, 0 No	
Rationale	The SEA described how it will publicly recognize and reward the highest-performing and high-progress schools.
Strengths	Indiana identified a number of ways that it will recognize and honor reward schools including: • Public recognition. • Priority points on some state competitive grants. • A plaque and school wide celebration.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

2.D   Priority Schools

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

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

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

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

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

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

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

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

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

2.D.iii.a (INCLUDING QUESTIONS (i)-(vii)) PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	The interventions that the SEA described in its application are not aligned with the turnaround principles. The panel questions if they are likely to result in dramatic, systemic change in priority schools.
Strengths	• Indiana's law, PL221, allows the state to take specific action in persistently low performing schools. • In 2011, seven schools entered a level where the state could intervene, and it did. The state assigned a special management team to 5 schools and is implementing a lead partner intervention in two schools.
Weaknesses, issues, lack of clarity	• Under current law, the state cannot intervene directly in "F" schools for four years unless invited by the LEA. To that point, all responsibility is left with LEAs—even if the schools have remained stuck at low levels of achievement for decades. LEAs must submit an improvement plan, but no information about that plan, or how its implementation would monitored, is included in this application. • While the state provided several supplemental documents, including a school quality review rubric, the state did not articulate a comprehensive framework for school improvement and as such has not aligned an intervention strategy to the turnaround principles. • Based on the documents submitted the state has not identified the standards and indicators of effective schools and districts to help inform any type of diagnostic or intervention progress. The state mentioned the use of the Mass Insight framework, but while Mass Insight's framework is recognized nationwide for outlining the conditions that are necessary for high-poverty high-performing schools to improve, that framework is not an intervention strategy. Indiana also provided a timeline that delineated PL221, which also is not an intervention strategy but rather details a school's progression toward state intervention.
Technical Assistance Suggestions	• The state needs to define the standards, practices, and indictors that are present in effective schools and districts in order to align resources and tools that will support their priority schools. • Once the state has articulated such standards, the panel recommends that they crosswalk the PL221 timeline – Current vs. Proposed, add a third column, and cross-reference the timeline with the turnaround principles and interventions that state has identified. • The state's proposed timeline for speeding up turnaround work needs attention; though it is an improvement on timelines under current law, it does not meet the requirements for this flexibility.

b.   Has the SEA identified practices to be implemented that meet the turnaround principles and are likely to —

(i)   increase the quality of instruction in priority schools;

(ii) improve the effectiveness of the leadership and the teaching in these schools; and

(iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The SEA has not identified practices to be implemented that meet the turnaround principles and are likely to: - increase the quality of instruction in priority schools; - improve the effectiveness of the leadership and the teaching in these schools; and - improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students.
Strengths	
Weaknesses, issues, lack of clarity	Based on the documents submitted, the state has not identified the standards and indicators of effective schools and districts to help inform intervention strategies for their lowest performing schools.
Technical Assistance Suggestions	

c. Has the SEA indicated that it will ensure that each of its priority schools implements the selected intervention for at least three years?

2.D.iii.c PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The SEA cannot guarantee that each of Indiana's priority schools will implement the selected interventions for at least three years.
Strengths	
Weaknesses, issues, lack of clarity	Under the current timeline, meaningful state interventions would not occur until year 6 of persistent low performance and a school could exit priority status after two consecutive years of maintaining a C grade or better. The panel concludes that this level of performance for two

	years does not guarantee meaningful improvement. • Indiana notes that its current system allows schools to move in and out of priority status each year and thus resetting the timeline when this occurs.
Technical Assistance Suggestions	

2.D.iv Is the SEA's proposed timeline for ensuring that LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year reasonable and likely to result in implementation of the interventions in these schools?

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

2.D.iv PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	SEA cannot ensure that all Priority Schools will be implementing meaningful interventions by the 2014–2015 school year even with the proposed legislative change.
Strengths	
Weaknesses, issues, lack of clarity	• By statute, the state has very little control over the interventions in priority schools until the schools have reached the four year mark of persistently low performance. • Current timeline does not meet the requirements; proposed timeline does not describe what the triggers are for each intervention. • The state has indicated a desire to change its legislatively-determined timeline for intervention, but its new proposal does not demonstrate the urgency required for intervention in its 154 priority schools. While PL221 mentions a school improvement plan, schools that are identified as F schools in the 2011-2012 school year will not engage with the Technical Assistance Team (TAT) until 2014-2015 school year. Based on the information provided, this is when the TAT will provide action-focused feedback on what is working well and clear targets for improvement at which time the IDOE would make a recommendation for interventions which may include assigning a special management team or an external lead partner; however this action could be delayed until 2016-2017 (or, if the SEA's proposal is approved, 2015-16) and during this first year the special management team or the lead partner will take a year to assess the school and plan for implementation in the following year. • The state has indicated that it will work with 7 of the 154 schools identified as priority schools but has not defined a timeline for intervention in the other 147 schools.
Technical Assistance Suggestions	

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

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

2.D.v and 2.D.v.a PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	Indiana has provided criteria, but the peers do not believe they are sufficient to ensure that the school has made significant progress.
Strengths	
Weaknesses, issues, lack of clarity	The SEA included criteria that do not guarantee significant progress.
Technical Assistance Suggestions	

2.E   Focus Schools

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?

2.E.i PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	The SEA described 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.
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

2.E.ii Did the SEA include a list of its focus schools?

    a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State's Title I schools?

    b. In identifying focus schools, was the SEA's methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?

    c. Did the SEA's methodology result in the identification of focus schools that have —

        (i) the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or

        (ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	State has identified schools using its accountability methodology, but has not necessarily identified schools that have lowest subgroup performance or largest gaps as required.
Strengths	State identifies 16% of Title I schools as "D" schools.
Weaknesses, issues, lack of clarity	By identifying "D" schools, SEA is not necessarily including the same schools that would be identified using the requirements of this principle.
Technical Assistance Suggestions	

2.E.iii Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its focus schools and their students and provide examples of and justifications for the interventions the SEA will require its focus schools to implement to improve the performance of students who are furthest behind?

➢ *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*

➢ *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	The SEA did not describe in sufficient detail the process and timeline it will use to ensure that each LEA identifies the needs of its focus schools and their students, or provided examples of and justifications for the interventions the SEA will require its focus schools to implement to improve the performance of students who are furthest behind.
Strengths	The School Quality Review Rubric provides a strong starting point to identify school and student needs.
Weaknesses, issues, lack of clarity	• The designation of the super subgroup masks the specific needs of individual subgroups. • The state has provided insufficient information about how it intends to work with districts or build district capacity to intervene in the focus schools. • While the state provided several supplemental documents such as their School Quality Review Rubric, the state did not articulate a comprehensive framework for school improvement and as such has not articulated a comprehensive approach for intervening in its focus schools. In fact, it seemed clear from the peers' phone meeting with state officials, that these schools are not currently a priority for them. • Based on the documents submitted the state has not identified the standards and indicators of effective schools and districts to help inform any type of diagnostic or intervention progress that will meet the needs of the sub-groups and close achievement gaps. • The state mentioned the use of the Mass Insight framework and while Mass Insight's framework is recognized nationwide for outlining the conditions that are necessary for high-poverty high-performing schools to improve, the framework is not the intervention strategy.
Technical Assistance Suggestions	Use the School Quality Review Rubric immediately after a school is designated priority.

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

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

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

2.E.iv and 2.E.iv.a **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The SEA's criteria do not ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps.
Strengths	
Weaknesses, issues, lack of clarity	The school only needs to earn a "C" in order to move out of focus status. However the attainment of a "C" does not ensure sustained improvement, nor does it ensure the improvement of any subgroup's performance.
Technical Assistance Suggestions	

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

2.F   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? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

2.F PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	The SEA's differentiated recognition, accountability, and support system does not provide incentives and supports for other Title I schools.
Strengths	
Weaknesses, issues, lack of clarity	• The state provided no information whatsoever on supports or incentives for schools outside of those in priority or focus status. • During phone call with Indiana staff they indicted that their focus is entirely on improving the quality of education for the priority and focus schools as opposed to focusing on other Title I schools. • The SEA is not doing the required AMOs, so they can't play a role in these incentives and supports.
Technical Assistance Suggestions	

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?*

2.G.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 no*	
Rationale	The SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools is unlikely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools.
Strengths	The SEA is reviewing annual intervention plans from LEAs for all priority and focus schools.
Weaknesses, issues, lack of clarity	- The state is silent on technical assistance, letting accountability drive the process. - The state has not defined or articulated a statewide system of support that would help facilitate capacity building activities. - The SEA's application did not articulate a 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.
Technical Assistance Suggestions	

ii. 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.ii PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	Beyond taking away control over priority schools that don't improve over six years, the SEA has not articulated a process for holding LEAs accountable for improving school and student performance, especially in priority schools.
Strengths	
Weaknesses, issues, lack of clarity	There is no focus on LEAs, only on schools. There is no way for the state or the public to readily evaluate what LEAs are doing surrounding their priority and focus schools.
Technical Assistance Suggestions	

iii. Is the SEA's process for ensuring sufficient support for implementation in priority schools, focus schools, and other Title I schools identified 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?

2.G.iii PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Rationale	The state has not addressed either support or resources in its request.
Strengths	
Weaknesses, issues, lack of clarity	There was no mention of leveraging funds or resources. Only mention of resources was about the resources the lower graded schools will lose, due to decreasing enrollment.
Technical Assistance Suggestions	

Principle 2 Overall Review

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

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	The panel does not believe that, taken as a whole, the system of accountability and support described in the application from Indiana is likely to bring about significant gains in student achievement or close the gaps that separate some groups of Indiana's students from others.
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	If Indiana wants to obtain the requested ESEA Flexibility, the state would have to fully incorporate the required ESEA subgroups, in addition to what it currently measures, and it would have to have a comprehensive and coherent framework of differentiated supports for LEA and for schools. The system would need to ensure there is inclusion of all students.

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 three options below?

<u>If the SEA selected Option A</u>:
If the SEA has not already developed any 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** *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option B or Option C*	

  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 *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option B or Option C*	

Note to Peers: Staff will review iii.

If the SEA selected Option B:
If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3:

Note to Peers: Staff will review i and iii.

ii.   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.ii PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option A or Option C*	

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

3.A.i OPTION B.iv PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option A or Option C*	

v. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines? Does the SEA's plan include sufficient involvement of teachers and principals in the development of the remaining guidelines?

3.A.i OPTION B.v PANEL RESPONSE Tally of Peer Responses: NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ Not Applicable because the SEA selected 3.A, Option A or Option C	

If the SEA selected Option C:

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 C.i PANEL RESPONSE Tally of Peer Responses: 6 Yes, 1 No	
Rationale	Guidelines and state model evaluation system appears likely to increase quality of instruction for students and improve student achievement.
Strengths	- Very strong teacher and principal rubric in RISE system. - Draft principal rubric quite innovative with its focus on the role principals need to play as a driver of student growth and achievement through their leadership skills and their ability to manage teacher effectiveness. - By statute, an educator can't be "effective" or better with negative growth scores and the state has the authority to define what is meant by negative. - Multiple ratings, annual evaluations. - Student growth plays meaningful role in evaluations, although weighted lower where state-provided growth measures are not available.

	• On call, Indiana estimates that 80% of LEAs will adopt state model RISE system.
Weaknesses, issues, lack of clarity	• Insufficient details regarding cultural competency and linguistic diversity in principal rubric.
Technical Assistance Suggestions	Principal rubric should incorporate attention to cultural and linguistic diversity in the communities surrounding the school and the students who are served by it. This might be added to section 2.2 of the Principal Effectiveness Framework, titled "Building Relationships"
☐ *Not applicable because the SEA selected 3.A, Option A or Option B*	

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 C.iii **PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	SEA has sufficient educator involvement in development and piloting of evaluation system.
Strengths	• Have a 6 district pilot with pre-and post- anonymous surveys to help guide the development of their tools. • The SEA has established a group of practitioners, called the Evaluation Cabinet, that has been meeting monthly for over 18 months in helping them craft their tools.
Weaknesses, issues, lack of clarity	• It is unclear who was involved in crafting regulations, and the extent to which teachers were involved in the development of their guidelines.
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option A or Option B*	

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

3.A.ii   For any teacher and principal evaluation and support systems for which the SEA has developed and adopted guidelines, consistent with Principle 3, are they systems that:

    a.   Will be used for continual improvement of instruction?

> ➤ *Are the SEA's guidelines likely to result in support for teachers that will enable them to improve their instructional practice?*

3.A.ii.a PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	Multiple opportunities for feedback from evaluators and strong rubrics. Not clear where teachers go for help when more help is needed.
Strengths	• RISE requires multiple observations per year with feedback. Multiple checks throughout the year for all teachers, which integrates the learning objectives with observation piece. Professional growth plans for lower performing educators are required by statute, encouraged for all teachers.
Weaknesses, issues, lack of clarity	• Unclear how this is being used to inform instructional practice, as well as where the teacher will go for help. • Not clear the state has spent much time thinking through the support side of this evaluation system for educators or evaluators. • Relying too heavily on measurement and feedback rather than professional supports for educators.
Technical Assistance Suggestions	To help its Principle 2 work, the SEA should translate its strong rubrics for teachers and principals into its framework for effective schools and districts.
☐ *Not applicable because the SEA selected 3.A, Option C*	

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 *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	The state system uses four performance levels and includes student growth in ways that will support meaningful differentiation.
Strengths	The system is highly differentiated using four performance levels. A negative rating on growth prevents an overall effective rating. Indiana differentiates growth measure weight depending on the reliability of the growth measure available.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

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 and 3.A.ii.c(i) **PANEL RESPONSE** *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	State model system if broadly adopted is primary process for meeting these requirements as well as state approval of alternative models.
Strengths	• Indiana has developed a state model system which they report is likely to be adopted by 80% of LEAs. • There is a process for state approval of alternative systems and for monitoring whether those alternatives align with student growth. • The state indicated during a phone call that they are working on guidance for student learning objectives for alternately assessed SWDs and for teachers who do not have primary responsibility for content instruction for ELs or SWDs. • Building student learning objectives around the student learning evidence for all teachers. • For the RISE system the state is using a train the trainer process for evaluator training and inter-rater reliability and is working through lessons learned from pilot evaluator training.
Weaknesses, issues, lack of clarity	Children who participate in iSTAR are not currently included in the State accountability system.
Technical Assistance Suggestions	Peers would discourage the use of IEP goal attainment for determining student growth.
☐ *Not applicable because the SEA selected 3.A, Option C*	

(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 *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	There is state-provided growth model for teachers in grades 4-8 ELA and Math.
Strengths	The state has an existing statewide growth model, and is piloting student learning objectives for teachers of SWDs who take the alternate assessments because the growth model currently does not apply to these assessments. On call, SEA said that growth model provider is analyzing whether IMAST is suitable for generating state-provided growth data.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

(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 *Tally of Peer Responses:* 5 Yes, 2 No	
Rationale	Student learning objectives with state guidance will be used for subjects without state-provided growth measures.
Strengths	• The state is pursuing student learning objectives for every teacher whether or not state-provided growth measure is also provided. • The state has embedded leadership student learning objectives into draft principal rubric to support rigor in this process. • The state has a committee working on guidance around the special issue of teachers of students with disabilities.
Weaknesses, issues, lack of clarity	Their current alternate assessment has led them to choose student learning objectives as a way to measure

	student growth in teacher evaluation.
Technical Assistance Suggestions	Use their test of English Language Proficiency test in addition to ISTEP for EL students. In order to included teachers of students with significant cognitive disabilities in educator evaluation, the state should consider more reliable strategies for including growth to be calculated in a reliable manner. If there is not a similar committee for evaluating teachers of EL students, should have one.
☐ *Not applicable because the SEA selected 3.A, Option C*	

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	All teachers and principals are evaluated annually.
Strengths	Educators are rated annually and have multiple discussions throughout the year.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

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
Tally of Peer Responses:
6 Yes, 1 No

Rationale	The RISE system provides multiple opportunities for feedback that has potential to guide professional growth.
Strengths	Multiple observations that are required will lead to regular feedback. Principals are evaluated in part based on their implementation of meaningful teacher evaluation including providing professional development and remediation opportunities to teachers.
Weaknesses, issues, lack of clarity	The professional development for teachers appears to rely on the capacity of principals and LEAs, and it is unclear what is being done to build that capacity.
Technical Assistance Suggestions	Develop toolkits or video libraries with development appropriate to each of the elements in the teacher and principal rubric that educators can use to improve their specific practice in each of the areas of the rubrics. Examine and review their attention to culturally and linguistically diverse issues.
☐ *Not applicable because the SEA selected 3.A, Option C*	

f.   Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE
Tally of Peer Responses:
7 Yes, 0 No

Rationale	Evaluations inform educator personnel decisions.
Strengths	- Rating is a factor into moving from "probationary" to "professional", and also may lead to loss of professional status. - Allows districts to set up compensation plans where evaluation factors are taken into account. - For teachers hired after July 2012, tenure will be tied to evaluations.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

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?*

> *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:* *3 Yes, 4 No*	
Rationale	Application lacks a detailed, comprehensive plan for the scale-up as required by 2012-2013.
Strengths	- Indiana's teacher evaluation plan is in state statute. - Districts can adopt the RISE model system without state or teacher approval. In order to adopt an alternate model, 75% of teachers have to approve. - There are some incentive funds to encourage implementation of performance-based compensation. - The state is looking at the three non-RISE districts in the pilot to help them develop criteria for review and approval of non-RISE systems in the future.
Weaknesses, issues, lack of clarity	Very large scale-up from piloting in 6 districts will occur shortly. The panel did not have a lot of detail about how the scale up will occur.
Technical Assistance Suggestions	The state needs to prepare a detailed plan for the rapid scale up required for the next school year.

Principle 3 Overall Review

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?

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Rationale	Indiana's statute, regulations and pilot RISE model provide a strong basis to believe that their full implementation will lead to increased quality of instruction for students and to improved student achievement.
Strengths	• Statute and regulations describe a system of multiple measures with growth playing a meaningful role in ensuring differentiation of performance into four rating categories. • The RISE state model system includes a strong teacher practice rubric and promising draft principal rubric that emphasizes principal's leadership role in improving teacher effectiveness. • Pilot of RISE and non-RISE systems appear to be well-designed and are providing rich sources of educator feedback and opportunities for educator involvement in the details of the systems to be implemented in statewide in 2012-13. • Student learning objectives for all teachers, including those without state-provided growth measures, are being piloted this year. Student growth is not weighted as heavily for teachers without state-provided measures, given the challenges of implementing rigorous student learning objectives. • Results of evaluations are a factor in teacher tenure, and potentially compensation.
Weaknesses, issues, lack of clarity	• The state's request does not include detailed plans for the rapid scale-up required for full implementation in 2012-2013. Train the trainer model for evaluators will be especially challenging to scale. • It is not clear how teachers in need of development find help if their principal is not skilled or focused on providing professional growth opportunities. • Especially given issues in Principle 2 of this application with how the SEA includes students with disabilities and ELs in their state accountability system, peers are not all convinced that the educator evaluation systems will include all students or fully address all teachers of students with disabilities and ELs.
Technical Assistance Suggestions	• Develop detailed plans for statewide roll-out with special attention to ensuring evaluator training and inter-rater reliability. • Ensure teachers are held accountable for **all** students.

	• Consider how state can ensure teachers have access to resources and tools to improve their practice based on feedback from the evaluation system.

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	
Rationale	The application for ESEA Flexibility submitted by the state of Indiana has some significant strengths. But it also has pervasive weaknesses that the peers believe render it unlikely to result in significant gains in student achievement among all groups of Indiana's children. Moreover, the process of producing the application involved too few stakeholder groups, from either inside and outside of education, to create the support and buy-in that would help with implementation. On Principle 1—Implementation of the Common Core State Standards—the State has already taken some important steps toward implementation, including analyzing the alignment between the state's current standards and the CCSS, analyzing the correspondence between the Indiana kindergarten English Language Proficiency standards and the linguistic demands of the CCSS, developing content frameworks and partnering with the Curriculum Institute to conduct outreach sessions for district and building-level administrators. The state is adding PARRC-like items to its assessment. Also, the state's approach to changing the preparation of teachers seems strong. However, beyond the activities conducted to date, the application provides very little information on the state's future plans, including clarity about SEA/LEA roles, the infrastructure for support, and a transition plan for ELs and SWD. Further, beyond content frameworks, there is little detail about providing the high quality instructional materials—including sample lessons—that will help teachers transition to the CCSS. On Principle 2—Differentiated Recognition, Accountability and Support—the panel does not believe that, taken as a whole, the system of accountability and support described in the application from Indiana is likely to bring about significant gains in student achievement or close the gaps that separate some groups of Indiana's students from others. In our judgment, it also falls woefully short of meeting federal requirements: • There are no goals for improving the performance of Indiana's low-income students, English Learners, students with disabilities, or racial and ethnic minorities, nor for closing the gaps among and between them. • Though state officials argue that the new "super subgroup" composed of the bottom 25% of all students will accomplish the same thing, the data they provide are neither accurate nor compelling. • Moreover, even though the application argues that the creation of the "bottom 25% super group" will

	bring about a newly energetic focus on students at the bottom, the peers note that the fact that the system awards equal points for movement of students in the subgroup they don't talk about—the top 75%—calls that claim into serious question. • Finally, there is almost nothing in this application about support for schools that need help to improve. On Principle 3—Educator Evaluation and Support—the state's work is considerably stronger. Already, the Indiana Legislature has passed enabling legislation, and the State Board has approved regulations describing a system of multiple measures, with four performance categories and growth playing a meaningful role. Results will be used for personnel decisions. The state has done thoughtful work on student learning objectives for non-tested grades and subjects. The state's RISE model seems very strong; it is being piloted now in three districts, alongside three district-designed models. Knowledge accumulated during the pilot phase will be used to improve both RISE and the framework and approval process for district-adopted alternatives. There was little information in the application about how the state will scale up its training for evaluators and other supports for statewide roll-out in 2012-13. Nor was the application clear on what kind of supports teachers could access when their ratings suggest a need for substantial improvement. There was some concern among peers, too, about the lack of clarity about how growth among students with disabilities and English Learners would be included in the evaluation of teachers. In sum, the state's work to date is strong and promising, though its plan for the future lacks the details of a high quality plan.
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	