ESEA Flexibility

Peer Panel Notes

State Request: Kentucky

Date: 12/5/11

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:* *7 Yes, 0 No*	
Rationale	• Extensive documentation of outreach to teachers and their representatives • Passage of Senate Bill 1 required engagement across state
Strengths	• Use of teacher advisory council • Additional councils and education associations consulted
Weaknesses, issues, lack of clarity	
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:* *3 Yes, 4 No*	
Rationale	• Limited information on consultation outside the education community
Strengths	• Webcast conducted targeted several advisory groups including Parent Advisory Council, State Advisory Panel on Exceptional Children, Gifted Advisory Council
Weaknesses, issues, lack of clarity	• EL, SWD, other subgroups (minority and poverty) consultation not adequate • Parent, community groups not sufficient
Technical Assistance Suggestions	• Ensure consultation with network of Kentucky parent advocacy groups funded by Office of Special Education programs and national advocacy groups

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:* *6Yes, 1 No*	
Rationale	• Comprehensive overview of reform agenda, includes all 3 principles
Strengths	• Collaboration between different agencies – legislation, department, etc – since 2009
Weaknesses, issues, lack of clarity	• Theory of change not coherently described (p. 16); does not show how pieces connect
Technical Assistance Suggestions	• Develop schema that illustrates and communicates well the overall theory of change and how the pieces contribute to desired outcome

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:* *4 Yes, 3 No*	
Rationale	• Strong roll-out plan for transition to Common Core Standards but not sufficient for ELs and SWD
Strengths	• Regional delivery system through Leadership Networks is designed to facilitate successful implementation • Building capacity at regional and local level to implement CCR standards • Crosswalk analysis between current and CCR standards • Plans to scale-up targeted interventions • Agreement across P-20 spectrum on definition of CCR • Online platform for sharing implementation tools and resources
Weaknesses, issues, lack of clarity	• The plan for transition to and implementation of the Common Core standards and assessments to measure CCR standards is comprehensive with a key exception. SWD and ELs and their teachers are missing from the plan. For example, the delivery plan tracks gaps by a) gender b) ethnicity and c) free/reduced lunch (p. 54, appendix p. 186), but not for ELs or SWD. • There is no reference to the definition of CCR for students who participate in alternate assessments based on alternate achievement standards, on which the new alternate assessments should be designed.
Technical Assistance Suggestions	• Address SWD and ELs in training. Special education teachers are given separate, intensive training through 11 special education cooperatives. Universal design for learning and positive behavior interventions and Support are not mentioned. Training related to instruction for ELs is limited to online and webinars. • Address the considerable challenges in ensuring linguistically appropriate and universally designed instructional materials, along with accommodations and policies that will support and ensure SWD and ELs can access Common Core State Standards. • Consider working with national consortia to address definition of CCR for students with significant cognitive disabilities to ensure the development of instructional materials that will prepare students for college and career.

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:* *No response*	
Rationale	Not applicable because the SEA selected option A.
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:* *5 Yes, 2 No*	
Rationale	• Overall comprehensive plan except for specific strategies applicable to SWD and ELs
Strengths	• Extensive planning and work with institutions of higher education, schools, districts, and education organizations over the last two years for the development of statewide accountability system, including implementing and transitioning to CCR standards
Weaknesses, issues, lack of clarity	• Overall implementation of Common Core for ELs and SWD, including professional development and standards development, is not sufficient.
Technical Assistance Suggestions	• Collaborate with SWD and EL experts and advocates to identify best practices, research-based practices to include in the development of common core transition plan

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:* *1 Yes, 6 No*	
Rationale	• Strong framework, but issues related to rigor of cut scores for growth, graduation rate, and overall expected improvements undermine strength of the plan.
Strengths	• Use of strong multi-measure framework including status, growth, gaps, career-readiness to identify gaps, focus interventions, tied to college and career readiness • All schools have gap goal which will facilitate a focus on closing gaps • 2 years of work already completed • Requires two years of meeting AMOs to exit priority and focus school status, indicating success over time, sustainability of improvement pattern • Achievement component will be in place by SY 2011-2012 • Next Generation Instruction and Support and Next Generation Professionals in development; plans are clear for phase-in of these two components into overall accountability score

2.A.i PANEL RESPONSE *Tally of Peer Responses:* *1 Yes, 6 No*	
Weaknesses, issues, lack of clarity	• Graduation accountability: only accounts for 14% of the index (20% of the 70% that is given to Next Generation learners = 14% of the overall index). It could create perverse incentives by promoting focus on improving achievement for middle-achieving students rather than improving graduation rates for all students. • Growth model: normative target is too low at 40th percentile for typical growth • Next Generation Instructional Programs and Support Review criteria not developed • Plan does not specifically include test participation rates as a factor in its multi-measure framework.
Technical Assistance Suggestions	• Ensure that test participation rate inclusion in multi-measure framework has some consequence to provide an incentive for schools and districts to maximize participation in statewide assessments • Monitor teacher and leader evaluation scores and their use in overall accountability • Monitor integrity of Next Generation Instructional Programs and Support program review process, including examining correlation between test scores and program review outcomes • Run growth model analytics to examine adequacy of growth to standard and determine potential benefits of including in their multi-measure framework • Increase importance of graduation rates in index, for example, by including dropout rate, counting dropouts as "zeroes" in achievement growth and gap indices in high schools, increasing weighting, or maintaining graduation rates as separate accountability measure under current 2008 regulation

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: *7 Yes, 0 No*	
Rationale	• Kentucky provided information on all 3 criteria
Strengths	• Building on existing, successful model
Weaknesses, issues, lack of clarity	
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	• Weaknesses described below related to subgroups and achievement gaps
Strengths	• Third standard deviation model captures performance of subgroups that might otherwise be masked in gap groups; creates accountability for subgroups • Serious about identifying schools with achievement gaps and ability to target interventions accordingly
Weaknesses, issues, lack of clarity	• Inadequate safeguards described to prevent early high school dropouts being used to improve achievement, gap, and growth indices • Inadequate description of how results will be monitored and services targeted to ensure gap-reducing goals are met (student outcomes and implementation of interventions) • Growth model: normative target is too low at 40th percentile for typical growth

2.A.i.b PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Technical Assistance Suggestions	• Develop materials and systems to better explain connection between index scores, observable outcomes, and strategies schools could use to improve teaching and learning • Consider measuring gaps in student growth rates to improve incentives and target support for closing achievement gaps for all subgroups of students

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	• Interventions for ELs and SWDs not adequately addressed
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• See 2.A.i.b

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	• Next-Generation Learners will be in place by 2011-2012 SY
Strengths	• Tiered approach to implementation of multiple Next-Generation measures allows for thoughtful development and data analysis
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:* *6 Yes, 1 No*	
Rationale	• Weighting gives emphasis to reading and mathematics, as these are included in achievement performance measure, growth performance measure, and college readiness measure.
Strengths	No text
Weaknesses, issues, lack of clarity	• Data is not provided (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 and subjects assessed)
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: 7 Yes, 0 No	
Rationale	• Kentucky followed Department's guidance but made goals slightly more ambitious
Strengths	• Use of a multi-measure framework for annual determinations on schools and state-established performance targets disaggregated by subgroup focused on all students reaching CCR
Weaknesses, issues, lack of clarity	• It appears that Kentucky has combined both reading and math in its AMO calculations rather than calculating AMOs separately for each subject.
Technical Assistance Suggestions	• Consider communication and integration strategies to make multiple models, their relationship to each other, and roles in accountability determinations understandable to the public. • Consider name other than "gap group" for public reporting.
☐ 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	• Kentucky's plan takes into account the overall accountability model in a way that recognizes, rewards, and utilizes schools in the top categories to promote best practices
Strengths	• Details of the reward and recognition are in development and review by stakeholder groups to ensure methods are appropriate and well received by schools and districts.
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:* *7 Yes, 0 No*	
Rationale	• Each option uses turnaround strategies, articulates specific interventions and focuses on capacity building
Strengths	• Identification of priority districts • Specific suggested interventions for each of the turnaround principles • Investing in capacity building, i.e. extensive training, putting staff in schools full-time • Community and higher education involvement through partnering on interventions, professional development, and support • Teacher turnaround team as lead change agent in priority schools
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure that special populations of students are clearly recognized in turnaround strategies

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	• (i) and (ii) are clearly addressed, but lack practices to improve student achievement for ELs, SWD and lowest-achieving students, and graduation rates for all students
Strengths	• Use of education recovery staff and leadership assessments in implementing interventions • Comprehensive school improvement plan process and monitoring
Weaknesses, issues, lack of clarity	• Inadequate description of plans for addressing subgroup achievement, graduation rates for all students • Delivery plan does not include performance of ELs and SWD (Appendix p. 186)
Technical Assistance Suggestions	• Specifically address graduation rates for all students, including ELs, SWD, and the lowest-achieving students • Electronic planning and monitoring ASSIST system should merge with annual reporting on subgroups, for example, Annual Performance Reports for special education

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:* *7 Yes, 0 No*	
Rationale	Interventions for priority schools are planned for three years
Strengths	
Weaknesses, issues, lack of clarity	
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:* *7 Yes, 0 No*	
Rationale	• Timeline meets requirements
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• State should consider how elementary and middle schools are included in their priority schools in the future

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	• Exit criteria for high school graduation rate is not rigorous
Strengths	• Three years of continuous improvement required to exit status
Weaknesses, issues, lack of clarity	• Schools can exit priority status with a 59% graduate rate for three years in a row
Technical Assistance Suggestions	• Consider site review (leadership assessment, quality and turnover in teacher force, etc.) in addition to accountability goals for exiting status

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	• Number of focus schools exceeds 10 percent requirement
Strengths	• Identification of focus districts
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:* *7 Yes, 0 No*	
Rationale	• List of schools and methodology meet requirements
Strengths	• Third standard deviation model picks up about ¼ of schools in the state as focus schools
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure that language in plan matches language in published list of schools (i.e. consistent category names)

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:* 7 Yes, 0 No	
Rationale	• Plan accomplishes requirements by combining state, district, and school-level accountability and support
Strengths	• Commissioner's Raising Achievement/Closing Gaps Council guides process for targeting interventions/support at district and state level
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure that interventions and monitoring address SWD and ELs

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	• Exit criteria for high school graduation rate is not rigorous
Strengths	• Looking at improvement from baseline mitigates problems otherwise associated with normative model, for example, by locking in 5-year goal, the 10% model would have to improve achievement beyond baseline
Weaknesses, issues, lack of clarity	• Schools can exit focus school status with a graduate rate above 60% for two years in a row
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:* *7 Yes, 0 No*	
Rationale	• System of Comprehensive School Improvement Plan supports other Title I schools; similar but less prescriptive measures tied to the CSIP process for all Title I and non Title I schools, as well as resources to support school improvement work
Strengths	• Comprehensive planning required of all schools • Automated system (ASSIST) helps facilitate real time review and revision at state and district level • Cross functional review teams review submissions to assess strengths and weaknesses
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure that cross-functional teams providing support to schools and districts include qualified individuals to assist with particular subgroups who are struggling academically • Include student reporting data from other school improvement initiatives, such as Annual Performance Report

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:* *7 Yes, 0 No*	
Rationale	• Strong focus on capacity building
Strengths	• Centers for Learning Excellence (three regionally, tied to IHEs) staffed by Education Recovery directors and leaders and specialists, turnaround teacher teams • Instructional support specialists in schools
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure regional structures and supports include expertise for relevant subgroups

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:* *7 Yes, 0 No*	
Rationale	• Sufficient documentation for multifaceted strategies to improve LEA capacity to support school improvement
Strengths	• Explicit focus on district capacity in priority and focus designations • Collaboration and articulation: joint accountability between school, district, and state
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Clarify how KDE is structured to support and monitor LEA capacity to support school improvement

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: 6 Yes, 1 No	
Rationale	• Kentucky submitted sufficient information on how they will take advantage of waivers to streamline funds to schools
Strengths	
Weaknesses, issues, lack of clarity	• Per pupil allocation for 1003(a) may not target funds effectively against intervention needs
Technical Assistance Suggestions	• Use first 1.5 years of SIG to get more fine-grained information to identify most effective use of funds

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	• Kentucky's plan includes strong overall accountability and support framework but there are a few critical issues that must be resolved.
Strengths	• Comprehensive strategy for addressing Principle 2
	• Intervention strategies for priority and focus schools were based on diagnostic reviews and substantial state support offered by state through regional teams, including staff embedded in schools and multiple tools and diagnostics e.g. 30 and 90 day plans
	• Regional support structures and resources linked with IHEs
	• Impressive cross-agency collaboration built into design and review process
	• Multiple measure index for schools that accounts for both important inputs and outputs
	• Third standard deviation model captures additional achievement gaps for subgroups
	• Includes subjects beyond reading and math in assessments and qualitative program reviews

PRINCIPLE 2 **OVERALL REVIEW** **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Weaknesses, issues, lack of clarity	• Strong potential for perverse incentives for high school dropouts in the high school accountability system, i.e. students who dropout are not counted in the achievement, gap, and growth indices which collectively count for much more than the grad rate piece of the index; very low bar to exit focus and priority status for graduation rate (59% for priority schools) • Performance targets in overall index are still under consideration by the state • 40th percentile growth is not adequately ambitious; it is below the expectation of a year's growth; also unclear whether/how to incorporate alternate assessments • Inadequate consideration of issues related to ELs and SWD, i.e. assessment, interventions, professional development • Transparency: difficult for parents and community to understand reporting • Lacks cohesion in statewide targets and AMO processes • Coherence: inadequate description of how the parts work together to yield school ratings • Appears that the 70% of schools would be indistinguishable in "needs improvement" category • Insufficient evidence that these are meaningful annual performance targets given the complicated standard deviation approach and lack of evidence that the adequacy of student growth is measured against CCR destination. Because this can be readily done with the methodology chosen, State may wish to do this R&D work first before rolling out this strategy described.

PRINCIPLE 2 **OVERALL REVIEW** **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Technical Assistance Suggestions	• Clarify and simplify relationship between multi-measure index and AMO approach as it may be difficult for stakeholders to understand. The index system does not provide clear connection to actual quantities of status, growth, gaps, or CCR for use in school improvement and public understanding. • To establish achievement AMOs, the state should consider running simulations using its growth model, for example, consider what level of growth would be needed to meet different attainment goals.

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?

If the SEA selected Option A:
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:* *7 Yes, 0 No*	
Rationale	• Plans are in development; regulations need to be passed by Board
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:* *7 Yes, 0 No*	
Rationale	• Kentucky has included sufficient involvement of teachers and principals in the development of these guidelines
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Ensure involvement of teachers of SWD and ELs in development of guidelines, for example, on work teams focused around growth measures
☐ *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:* *No response*	
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:* *No response*	
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:* *No response*	
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:* *No response*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
⊠ *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:* NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
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:* NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *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:* *NA*	
Rationale	
Strengths	
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:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *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:	
NA	
Rationale	
Strengths	
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:	
NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *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:* *NA*	
Rationale	
Strengths	
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:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *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:* *NA*	
Rationale	
Strengths	
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:* *6 Yes, 1 No*	
Rationale	• Kentucky submitted proposed plan to develop guidelines. While the tools themselves need further development, the plans for a statewide model and accountability for districts are strong.
Strengths	• Detailed project plan for professional growth and evaluation system • Proposes statewide system based on multiple measures to enable state to monitor quality assurance and fidelity of implementation
Weaknesses, issues, lack of clarity	• Based on narrative and project plan, it is not evident how academic growth on tested and untested subjects will be measured for purposes of evaluation. • Timeline: plan to use Summer 2012 for developing system and conducting training may not be sufficient, as regulations will not be passed until Spring 2012 • Pilot and field testing phases do not explicitly describe inclusion of teachers of ELs and SWD • While SGPs will be used for institutional accountability, no reference to a specific growth model for educational effectiveness is evident, nor is a process for selection. The research base cited does not include work with SGPs. No discussion is evident of how and when determining a strategy to measure growth in untested subjects will occur. The project plan includes development of a plan for use of resulting data by teachers, principals, superintendents, and communities and this is shown as complete as of 2/28/11. However, key data elements for academic growth have not yet been developed. The project plan includes about 110 days for defining and drafting the student growth process (31 days) and testing the student growth process (81 days). This may be sufficient for tested subjects but likely not realistic for untested subjects.
Technical Assistance Suggestions	• Encourage consideration of teachers of SWD and ELs and implications related to instruction and assessment of CCSS.

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:* *5 Yes, 2 No*	
Rationale	• Kentucky provided documentation related to development and implementation of teacher and principal evaluation and support systems; however, the plan is still being developed
Strengths	• See 3B
Weaknesses, issues, lack of clarity	• See 3B • Student growth domain will be difficult to implement with fidelity and consistency across schools and districts; not clear how goals and evidence of growth are to be developed and documented
Technical Assistance Suggestions	• Indicators need additional clarity and description to implement with fidelity, especially at above expectations • Clearly outline cycle for observation and pre/post observation conferences for teacher and principal evaluation • Consider carefully how to best incorporate teacher and principal evaluation component and overall accountability system: consider a measure of teacher evaluation quality into principal evaluation to counteract the tendency to inflate scores • Consider using student growth percentile instead of, or as part of, growth domain in current framework for teachers in tested subjects and at school level for principals

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	• Kentucky provides a strong plan but critical elements that must be addressed to make it a comprehensive and coherent approach to accountability and interventions.
Strengths	• Comprehensive approach to fundamental components was present in request, including: common core planning, multiple measures framework for assessing school performance, capturing subgroup performance in focus school category, capacity-building focus of school interventions, building statewide infrastructure of support and delivery
Weaknesses, issues, lack of clarity	• Overall implementation description of how to include ELs and SWD in transition to Common Core, including assessments and targeted interventions, is insufficient. • Principle 2 – see weaknesses outlined in Principle 2, particularly calibration of measures, rigor of growth goals, and graduation rate accountability, coherence and transparency (particularly for high school)
Technical Assistance Suggestions	• See recommendations for Technical Assistance in Principles 1, 2, and 3