

ESEA Flexibility

Peer Panel Notes



State Request: Louisiana

Date: March 29, 2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

Consultation Question 1 Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The State Education Agency (SEA) identified many instances where it solicited feedback during the planning process. Teachers and their representative were more involved in Principles 1 and 3.
<i>Strengths</i>	Teachers and their representatives were significantly involved in Principles 1 and 3.
<i>Weaknesses, issues, lack of clarity</i>	There is little evidence that teachers and their representatives were significantly involved in Principle 2.
<i>Technical Assistance Suggestions</i>	None noted.

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

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*
- *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The SEA meaningfully engaged and solicited 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. • Consultation was extensive. There is evidence that the SEA used feedback in Principles 1, 2, and 3 to shape its flexibility request.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA’s Special Education Advisory Panel, NAACP, and Teachers of English to Speakers of Other Languages provided feedback about the flexibility request. • Additionally, other diverse groups (<i>e.g.</i>, Black Alliance for Educational Options, Louisiana (LA) Parent Teacher Association (PTA), and Urban League) were engaged in various ways (<i>e.g.</i>, survey, overview presentation). • The SEA included examples of how stakeholder input influenced its flexibility request.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • None noted.
<i>Technical Assistance Suggestions</i>	None noted.

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

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

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

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

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

1.B Panel Response, Part A

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA presented a comprehensive and high quality plan to transition to and implement college- and career-ready standards statewide.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA conducted an alignment study to analyze the degree of match or overlap between the SEA’s current grade-level expectations and the common core state standards (CCSS). • The SEA is revising assessment resources to align with the transitional and new curriculum and assessments throughout the 2011-2012 school year. • Professional development regarding the new LA Comprehensive Curriculum will be provided concurrently with implementation, including specific content standards as well as effective strategies and modeling to teach these standards. • The SEA will offer a nine-day training for each grade and course for teachers during the 2012-2013 school year, with a full day of each unit of the curriculum including specific training on accommodations and support for students with disabilities and English Learners. • Partnership for the Assessment of Readiness for College and Careers (PARCC) test items will undergo field testing for several years. • The SEA is moving forward with updating its Science and Social Studies standards. • The SEA’s flexibility request specifically addresses how students with disabilities and English Learners will have the opportunity to reach CCSS. • The SEA meaningfully involved higher education by creating a leadership team and hosting a summit.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The timeline outlined in the flexibility request and addendum shows a transition period for grades 3-12 that raises concerns about full implementation within the timeline and exposure of all students to rigorous college and career ready content. • The SEA has decided not to adopt transitional assessment or to augment the existing assessment or change cut scores on its existing state assessments despite relatively high levels of proficiency that are unlikely to correspond to college and career readiness.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Given the transitional nature of the timeline, the SEA should determine a means for students in grades 3-12 to have access to more rigorous content, (e.g., teach algebra in grade 8). • The SEA should consider changing cut scores on the existing state assessments to better correspond to college and career readiness.

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

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

1.B Panel Response, Part B

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s plan leads to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the college- and career-ready standards.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA described several activities to support students with disabilities including expanding resources on the its website serving educators and families of students with disabilities, restructuring the SEA including the dispersing of special education personnel throughout the agency, training and professional development for special education professionals (e.g., Inclusion Matters conference), and creating an LA State Personnel Grant (pp. 32-35). • The SEA described several activities to support English Learners. The SEA is a member of the English Learner State Collaborate on Assessment and Student Standards (SCASS) and State Collaboratives on English Language Acquisition (SCELA). The SEA participated in an 18 month study that systematically examined the four language modalities assessed under Title III. • The SEA is also a member of a group of more than 20 states and the University of California in a proposal for federal funds under the U.S. Department of Education’s Office of English Language Acquisition (OELA) National Professional Development Program (NPD) to create professional development activities intended to improve instruction for English Learners and improve the effectiveness of educational personnel working with such children. • The SEA is working with Council of Chief State School Officers (CCSSO), two comprehensive centers, and thirteen states to develop a new set of English language proficiency standards and corresponding assessments that are aligned to the common core state standards (CCSS) and PARCC assessments. • The SEA is a member of a National Center and State Collaborative (NCSC) that is developing an alternative assessment based on alternative achievement standards for students with significant cognitive disabilities. • Responding to educators’ suggestions, the SEA plans to focus the work of its district CCSS specialists and school implementation teams on supporting district and school level personnel serving English Learners and students with disabilities

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The flexibility request does not provide specific information about instructional materials and supports being developed for teachers of students with disabilities and English Learners.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Given that the SEA’s participation in the NPD program funded by OELA is conditional upon receiving funds, the SEA should establish a contingency plan to address the professional development needs of teachers of English Learners if funds are not available. The SEA should clarify that the alternative assessment being developed is aligned with CCSS. The SEA should develop a more comprehensive, detailed, and coordinated plan to support teachers of students with disabilities and English Learners in the CCSS transition.

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

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

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

If the SEA selected Option B:

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

1.C, Option B Panel Response

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

Tally of Peer Responses: NA

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

Principle 1 Overall Review

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

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned, and high-quality assessments that measure student growth is comprehensive, coherent, and likely to increase the quality of instruction and improve the achievement of all students, including English Learners and students with disabilities.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA conducted an alignment study to analyze the degree of match or overlap between LA’s current grade-level expectations and CCSS. • The SEA is revising assessment resources to align with the transitional and new curriculum and assessments throughout the 2011-2012 school year. • Professional development regarding the new LA Comprehensive Curriculum will be provided concurrently with implementation, including specific content standards as well as effective strategies and modeling. • The SEA described several activities to support students with disabilities, including: expanding resources on its website, serving educators and families of students with disabilities, restructuring the SEA -- which includes dispersing special education personnel throughout the SEA, and providing training and professional development for special education professionals (e.g., the Inclusion Matters conference), and an LA State Personnel Grant (pp. 32-35). • The SEA also described several activities to support English Learners. It is a member of the English Learner State Collaboratives on Assessment and Student Standards (SCASS) and State Collaboratives on English Language Acquisition (SCELA). The SEA participated in an 18 month study that systematically examined the four language modalities assessed under Title III.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The timeline outlined in the flexibility request and addendum shows a transition period for grades 3-12 that raises concerns about full implementation within the timeline and the exposure of all students to rigorous college and career ready content. • The SEA has decided not to adopt transitional assessments or to augment the existing assessments or change cut scores on its existing state assessments despite relatively high levels of proficiency that are unlikely to correspond to college and career readiness. • The flexibility request does not provide specific information about instructional materials and supports being developed for teachers of students with disabilities and English Learners.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Given the transitional nature of the timeline, the SEA should determine a means for students in grades 3-12 to have access to more rigorous content, (e.g., teach algebra in grade 8). • The SEA should consider changing cut scores on the existing state assessments to better correspond to college and career readiness. • The SEA should clarify that the alternative assessment being developed is aligned with CCSS. • The SEA should develop a more comprehensive, detailed, and coordinated plan to support teachers of students with disabilities and English Learners in the CCSS transition.

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

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

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

2.A.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA proposes a differentiated recognition, accountability, support, and intervention system that expands on the statewide system established in 1997 (p. 40). Key system features include a publically reported multi-measure framework yielding letter grades that includes measures of (1) proficiency status (ELA, Mathematics, Science, Social Studies, end of course tests), (2) expected normative student longitudinal growth, (3) dropout rates, (4) Plan, Explore, ACT, (5) graduation rates and index. The proposed system also includes a set of universal, targeted, and intensive supports and interventions, including state-takeover of persistently low-performing schools through the Recovery School District (RSD). However, the SEA’s plan has major weaknesses that led the panel to conclude that the plan does not create a coherent and comprehensive system that supports continuous improvement in the SEA, its LEAs, its schools, and its students. The weaknesses are largely related to the calibration of measures, which, without correction undermine incentives for improvement, the value of the information to the public, and the coherence of the overall accountability system.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA publically reported school classifications using letter grades. • The SEA made use of a body of evidence for making annual evaluations about schools. • The SEA’s proposed system includes annual measurable objectives (AMOs), or targets, for each indicator. • The SEA differentiated support and intervention system with intensive interventions based on number of years rated as an Academically Unacceptable School (AUS), including AUS 1 to AUS 6+, (p. 41). Schools in AUS status for four consecutive years can be moved to the RSD where they must remain under the SEA’s direct management for five years.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA established a clear differentiated system for schools; however, a parallel system for district accountability is not described. • The SEA’s weighting, described on p. 50 (Table 2.G), shows a status-based approach that de-emphasizes student longitudinal growth, which is used only to provide bonus School Performance Score points (p. 64). This continues to reinforce a focus on students on the cusp of proficiency, rather than maximizing growth rates for all students toward college and career readiness. • The language the SEA used to describe growth is unclear and may be confusing to stakeholders. The term “growth” is used to describe (1) individual longitudinal growth (p. 63), (2) change in status of different groups of students from one year to next (p. 57, Report Card), and (3) annual gain in School Performance Score points across all measures. • The rigor of expectations within the SEA’s AMOs does not provide incentives to improve the achievement and attainment of college and career readiness for low performing students: (1) setting 80 percent graduation rate as an “A” is a low bar. (p. 54); (2) a school meets combined subgroup AMOs with only 35 percent of students making expected longitudinal growth when an appropriate expectation would be greater than 50 percent (p. 63); (3) use of “Basic” as “Proficient” (p. 66), which is unlikely to reflect being on track to college and career readiness; and (4) the omission of subgroup or combined subgroup graduation rates from the AMOs in so far as they drive rewards and consequences. • Given that the goal of reaching 100 percent proficiency by 2014 is not attainable, as it continues to emphasize proficiency over growth and ensures many schools that show high student growth rates will continue to be labeled negatively. It is not clear that this is reasonable and useful to retain this goal. • The only AMOs related to subgroups appear to be for the combined subgroup of non-proficient students. It is unclear how individual subgroup performance is factored into a school’s letter grade other than being simply reported to the public. • The SEA’s approach to use longitudinal growth on the Plan, Explore, ACT sequence remains under development. • The extent of coherence among the institutional and educator accountability systems proposed is potentially jeopardized by fundamentally different performance frameworks. The system for evaluating schools is largely based on status measures and the system proposed for evaluating principals and teachers is largely based on longitudinal growth, which may produce conflicting signals of quality including contradictory perspectives on overall school effectiveness and the percentage of teachers evaluated as effective.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should be clear about what constitutes longitudinal growth, change in percent proficient, and gains in School Performance Score points. Not all of these should be described as growth. The panel recommends that the term “growth” be reserved for individual student longitudinal growth. • The SEA should consider a framework that equally values student growth rates (velocity of learning) and proficiency rates (reaching cut points) to ensure a focus on both the leading indicator of how fast a child is moving and the lagging indicator of reaching a destination. • See additional technical assistance suggestions throughout the remainder of 2.A

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

2.A.i.a Panel Response

Tally of Peer Responses: 5 *Yes*, 1 *No*

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	The SEA’s accountability system provides differentiated recognition, accountability, and support for all LEAs in LA and for all Title I schools in those LEAs based on: (1) student achievement in ELA and mathematics, as well as Science, Social Studies and end of course tests, for all students and all subgroups of students; (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, but not necessarily including the performance and progress of all subgroups. This last point is discussed further under “Weaknesses, issues, lack of clarity”, below.
Strengths	<ul style="list-style-type: none"> • The SEA’s key system features include a public multi-measure framework yielding letter grades with measures of: (1) proficiency status (English Language Arts (ELA), Mathematics, Science, Social Studies, end of course tests); (2) expected normative student longitudinal growth; (3) dropout rates; (4) PLAN, EXPLORE, ACT; (5) graduation rates; and (6) a graduation index. The SEA’s system also includes a combined subgroup comprised of non-proficient students that encompasses all low performing students in ESEA subgroups. The system features a set of universal, targeted, and intensive supports and interventions, including an SEA-takeover of persistently low-performing schools.

<i>Response Component</i>	<i>Peer Panel Response</i>
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • The SEA’s only AMOs related to subgroups appear to be for the combined subgroup of non-proficient students. The SEA’s combined subgroup, including both students at “approaching basic” and “unsatisfactory” levels, could potentially mask differences among those groups of students. The SEA does not factor individual subgroup performance into a school’s letter grade or awards and consequences other than reporting these data to the public. Gaps in student growth rates among disaggregated groups are neither measured nor reported. The multi-measure framework, focused largely on status, will likely cause a focus on moving students close to the cusp to drive up proficiency rates. • The SEA omits subgroup graduation rates from any of its AMOs. • The SEA awards points to attendees and recipients of certificates of achievement into its calculation of the graduation index; this may dilute the meaningfulness of the index (p. 54).
Technical Assistance Suggestions	<ul style="list-style-type: none"> • The SEA should consider including subgroup AMOs as an element with consequences in the school grading system.

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

2.A.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	While the SEA proposes a reasonable recognition, accountability, and support system, its choice of measures and the weighting assigned to these measures is likely to create incentives for action and attention that are unlikely to be effective in closing achievement gaps for all subgroups of students.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA proposes a reasonable theory of action for its differentiated accountability and support system. Key system features include a public multi-measure framework yielding letter grades. The SEA’s system includes measures of (1) proficiency status (ELA, Mathematics, Science, Social Studies, end of course tests), (2) expected normative student longitudinal growth, (3) dropout rates, (4) PLAN, EXPLORE, ACT, (5) graduation rates, and (6) a graduation index. This multi-measure framework plus additional performance information included on public reports is used to inform tiered supports and interventions based on severity of need. The framework produced evidence that can trigger state control through the RSD.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA’s incentives are based on annual changes in status, rather than longitudinal growth, which are unlikely to be effective in closing achievement gaps. The approach is likely to focus attention on students on the cusp of proficiency and fails to differentiate positive student growth rates from negative student growth rates in schools with equal proficiency. • Also, by not including a focus on disaggregated groups that are already proficient, insufficient attention may be given to ensuring such students have adequate growth rates to remain proficient or to continue improving. • The rigor of expectations within the SEA’s AMOs does not provide incentives to improve the achievement and attainment of college and career readiness for low performing students: (1) setting 80 percent graduation rate as an “A” is a low bar. (p. 54); (2) a school meets combined subgroup AMOs with only 35 percent of students making expected longitudinal growth when an appropriate expectation would be greater than 50 percent (p. 63); (3) use of “Basic” as “Proficient” (p. 66), which is unlikely to reflect being on track to college and career readiness; and (4) the omission of subgroup or combined subgroup graduation rates from the AMOs in so far as they drive rewards and consequences.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should reexamine the design of the multi-measure framework and weightings and the rigor of indicators to consider how individual subgroup performance could be more consequential and how student longitudinal growth could be considered to better report school effectiveness and diagnose and target interventions focused on closing gaps. • The SEA should examine different thresholds for meets expectations under the “Growth Among Non-Proficient Students” AMO. The SEA should also consider raising its graduation rate expectation to 90 percent for schools rated an “A.” The SEA should consider establishing growth and status AMOs for each required disaggregated group. • Additionally, the SEA should substantially raise the AMO standard for the percentage of students meeting or exceeding expectations. • The SEA should consider setting mastery and advanced as its definition of proficient for state and ESEA purposes. This would also increase the rigor of the system during the transition to the CCSS. • Furthermore, the SEA could include subgroup and/or combined subgroup graduation rates in the AMOs in so far as these measures drive rewards and consequences.

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

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

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than

reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

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

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

2.A.ii.b PANEL RESPONSE

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

Tally of Peer Responses: 3 Yes, 3 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA included student achievement on assessments in addition to ELA and mathematics in its differentiated recognition, accountability, and support system to identify reward, priority, and focus schools. The SEA’s weighting of the included assessments may result in holding schools accountable for ensuring all students achieve the state’s college- and career-ready standards. However, the SEA fails to demonstrate the efficacy of using Basic rather than Mastery performance as evidence of college and career readiness.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA has provided that mathematics and ELA assessments will be weighted double for every grade level; science and social studies will receive a single weight (p.61).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA has neither described nor made clear the efficacy of using Basic rather than Mastery-level performance as evidence of college and career readiness. Getting this right is very important for a system that depends to such a great extent on status/attainment measures: the percentage of students reaching a specific learning destination.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider using mastery and advanced as the definition of proficient for state and ESEA purposes. This may also assist with increasing the rigor of the system during the transition to CCSS.

2.B Set Ambitious but Achievable Annual Measurable Objectives

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

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

If the SEA selected Option C:

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

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA described how it will set AMOs in at least ELA and mathematics, for schools but not the State, LEAs, and subgroups. The panel expressed concerns about the rigor of goals used to guide the SEA’s support and improvement efforts. The SEA proposes three AMOs that factor into school ratings: (1) expected longitudinal, normative growth for non-proficient students (combined subgroup), (2) overall school performance improvement (index points), and (3) overall proficiency by 2014. However, AMOs for individual subgroups do not appear to be included. Also, concern exists about the rigor of expectations underpinning the AMOs for growth and overall school performance improvement.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA provides a clear linkage between the multi-measure framework it uses to assign letter grades to schools and trigger support and its method for calculating AMOs.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA describes school-level AMOs; however, there does not appear to be a method for establishing SEA and LEA-level AMOs. • The only AMOs related to subgroups appear to be for the combined subgroup of non-proficient students. Individual subgroup performance is not factored into a school’s letter grade or AMOs other than being simply reported to the public. • The rigor of expectations within the SEA’s AMOs does not provide incentives to improve the achievement and attainment of college and career readiness for low performing students: (1) setting 80 percent graduation rate as an “A” is a low bar. (p. 54); (2) a school meets combined subgroup AMOs with only 35 percent of students making expected longitudinal growth when an appropriate expectation would be greater than 50 percent (p. 63); (3) use of “Basic” as “Proficient” (p. 66), which is unlikely to reflect being on track to college and career readiness; and (4) the omission of subgroup or combined subgroup graduation rates from the AMOs in so far as they drive rewards and consequences. • The SEA intends to use a Hierarchical Linear Model (HLM) value added methodology with covariates for the purpose of adding bonus points and calculating AMOs. However, several panel members noted that the methodology used is not transparent to, nor diagnostic for, educators or parents, and may not contribute to the capacity to improve student growth.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should reexamine the design of its multi-measure framework and weightings and rigor of indicators to consider how individual subgroup performance could be more consequential and how student longitudinal growth could be factored in to better report on school effectiveness and diagnose and target interventions focused on closing gaps. • The SEA should examine different thresholds for meets expectations under the “Growth Among Non-Proficient Students” AMO. The SEA should consider raising the graduation rate expectation to 90 percent for schools rated an “A.” The SEA should consider establishing growth and status AMOs for each required disaggregated group. • The SEA should substantially raise the AMO standard for the percentage of students meeting or exceeding expectations. • The SEA should consider using mastery and advanced as its definition of proficient for State and ESEA purposes. • The SEA should include subgroup and/or combined subgroup graduation rates in the AMOs in so far as they drive rewards and consequences. • The SEA should conduct simulations to demonstrate the meaningfulness of awarding .1 bonus points for combined subgroup AMO attainment to the letter grade index and substantially raise the 35 percent level for the percentage of students in a school making expected growth and awarding more bonus points. This is vital given that having all students make expected growth is a necessary condition for all students to become proficient.

2.C Reward Schools

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

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s proposed methodology for the designation of a high progress schools does not appear to be educationally sound.
<i>Strengths</i>	<ul style="list-style-type: none"> • None noted.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • For the purpose of designating high progress schools, it appears that a low-graded school could become a reward school and avoid priority or focus designation given the expectation of only having to move ten points on the school grading scale (p. 66).

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

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

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

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The recognition and applicable rewards proposed by the SEA for its highest-performing and high-progress schools are likely to be considered meaningful by the schools. The SEA has consulted with LEAs and schools and has made adjustments based on that input, including awarding bonus points on the School Performance framework.
<i>Strengths</i>	<ul style="list-style-type: none"> The SEA proposes the use of financial awards, public recognition, and additional School Performance Score points (p.67) to make the status of reward school meaningful.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The SEA’s approach to using longitudinal growth on the Plan, Explore, ACT sequence is under development. As a result the State was unable to provide a list of reward Schools. The SEA’s description of the value-added model that will be used for institutional accountability lacks specificity. For example, does the SEA propose using the identical model specification that will be used for Principle 3? If so, the inclusion of covariates in the value-added model for free and reduced lunch (FRL), attendance, and prior discipline as described in Principle 3 may not be appropriate for school evaluation. Also, the use of a purely normative “expected growth” model when the population being normed is overall low-performing, may not set rigorous expectations regarding sufficient growth.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> The SEA should ensure that the information yielded by the value-added models used for institutional and educator effectiveness determinations are aligned and contribute to system coherence and stakeholder understanding and action. The SEA should simulate the effect of the high progress AMO on very low performing schools including ones otherwise subject to priority or focus designation.

2.D Priority Schools

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

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

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

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA's approach to intervening in priority Schools through use of the RSD provides for the authority and autonomy to make dramatic, systemic changes. The RSD provides authority to modify all aspects of a school's design, including: changing staff without regard to tenure or collective bargaining, modify program, and adjust the use of time.
<i>Strengths</i>	<ul style="list-style-type: none"> • Priority Schools are those schools transferred to the RSD. As of 2011-2012 school year, the RSD operates 7.9 percent of Title I schools statewide (p.69). The scope and authority of the RSD includes all interventions listed in i-vii above.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA's capacity to run schools in rural areas through the RSD, and to substantially expand the number of RSD schools generally, is not described.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should run analyses to determine whether a high rate of longitudinal growth (expected growth) can overcome low status in priority school identification. In other words, the SEA should determine the susceptibility of the framework to producing false negatives. • The SEA should clarify urban vs. rural strategies in intervening in persistently low-performing schools, including how state staff and networked teams will be deployed. • The SEA should clarify the RSD's capacity to absorb substantially larger numbers of schools.

b. Are the identified interventions to be implemented in priority schools likely to —

- (i) increase the quality of instruction in priority schools;
- (ii) improve the effectiveness of the leadership and the teaching in these schools; and
- (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

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

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA has the authority to require interventions in priority schools likely to increase the quality of instruction in such 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.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA proposes using the Recovery School District (RSD) to intervene in priority schools. The RSD is already established with a track record and has the needed authority and responsibility. • The SEA provides data on p. 43 and p. 97 that suggests RSD efforts are effective at increasing quality of instruction, leadership, and teaching in both charter and district-run schools. • Based upon a completed needs assessment completed by the LEA, the SEA will work to support the LEA based on identified needs.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA's capacity to run schools in rural areas through the RSD is not described. Only a generic strategy for school intervention is described, without detail related to urban vs. rural and English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should develop a strategy to address rural school interventions through the RSD.

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

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

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

2.D.iv Panel Response*Tally of Peer Responses: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s proposed timeline ensures that priority schools will implement meaningful interventions aligned with the turnaround principles no later than 2014-2015. The SEA proposes to distribute interventions throughout priority schools for implementation in a balanced manner, such that there is not a concentration of these schools in the later years of the timeline.
<i>Strengths</i>	<ul style="list-style-type: none"> • Because the SEA proposes to use a well-established system through the RSD to ensure meaningful interventions, the 2014-2015 timeline has already been met.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • None noted.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

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

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

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

2.D.v and 2.D.v.a PANEL RESPONSE*Tally of Peer Responses: 6 Yes, 0 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s criteria are designed to ensure that schools that exit priority status have made significant progress in improving student achievement and are likely to result in sustained improvement.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA has a provision that all schools transferred to the RSD must remain in the RSD for a minimum of five years (p. 75). To exit, a school must receive a School Performance Score of 80 or above, which equates to the middle of the “C” rating. Schools are allowed to remain in the RSD permanently. • The SEA also has a thoughtful “RSD Return of Schools” policy that sets meaningful standards for schools to be returned to district governance and management (app. 2D, pp. 101-103).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • None noted.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

2.E Focus Schools

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

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

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

2.E.i.b Panel Response

Tally of Peer Responses: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA proposes identifying schools that earn a grade of “Pre-RSD F” as focus schools. The SEA’s simulations indicate that the percentage of schools identified will exceed 10 percent. The multi-measure framework the SEA provided to grade schools uses an AMO based on a combined subgroup of non-proficient students rather than for individual subgroups.
<i>Strengths</i>	<ul style="list-style-type: none"> • The use of a single multi-measure framework to evaluate schools, trigger interventions, and inform improvement planning creates the potential for a well-aligned, coherent system, which is understood by stakeholders.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The SEA proposes to identify focus schools as those that earn a “Pre-RSD F” grade based on the multi-measure framework that only requires a target of 35 percent of students making expected normative growth. It is not evident, for the reasons discussed in 2.A above, that schools identified will be those with the largest gaps in achievement or growth rates among disaggregated groups or with the lowest performance levels among members of disaggregated groups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> The SEA should determine the proportion of the 44 percent of schools that are in D or F status that remain there for multiple years and whether appropriate interventions are being taken for chronically low performing schools (p. 46).

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

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

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

2.E.iii Panel Response

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The SEA’s addendum provides that it will identify the needs of its focus schools and implement interventions at the start of the 2012-2013 school year. The SEA has proposed a well-articulated but generic process of planning and identifying interventions that lacks specificity in describing interventions and the suitability of these interventions to meet the needs of different student groups including English Learners and students with disabilities.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> The SEA provides a well-articulated description of its process for focus school supports (p.76), including diagnostics, the Trailblazer network of low performing school districts that work with state team leads for intensive support, a heavy emphasis on Common Core State Standards and educator effectiveness system implementation (COMPASS), and use of school turnaround facilitators as well as development of a pipeline of turnaround leaders through the Louisiana School Turnaround Specialist Program (LSTS) (p.79).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The process described by the SEA is largely a generic approach. The SEA notes that it will identify promising strategies to meet student needs, but provides no specific examples of and justifications for the interventions the SEA will require its focus schools to implement. The SEA has not demonstrated that the interventions will be effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools. Nor 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).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> The SEA should identify specific research based 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.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s criteria for exiting focus school status require sustained gains over a two-year period that produce an increase of one letter grade, from and F to a D. Thus, schools earning a D over two years may exit focus status.
<i>Strengths</i>	<ul style="list-style-type: none"> The use of a single multi-measure framework to evaluate schools, trigger interventions, and inform improvement planning creates the potential for a well-aligned, coherent system, which is understood by stakeholders.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is unclear whether the definition of focus schools captures schools with the largest achievement gaps or the lowest performing students in those groups; therefore, the SEA’s definition raises doubt regarding whether schools exiting focus school status will have demonstrated sustained improvement on the part of the lowest performing subgroups. • It appears that schools that began as a pre-RSD F could exit focus status by earning a D over two years. This would be a low bar and not indicative of sustained improvement.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider requiring the same performance threshold for focus schools as the SEA proposes for priority schools.

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

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

2.F.i Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA proposes providing incentives and supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination.
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA proposes providing incentives and supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination. • The Trailblazer initiative assists a network of LEAs seeking to avoid placement of their schools in the RSD to collaborate to improve student achievement in their schools. • The SEA has created a support system that clusters school districts with low performing schools with network teams according to similarities in needs and challenges in order to build capacity and ensure success.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA does not describe how it will use AMOs for subgroups to provide incentives and supports for schools that are not priority or focus schools. • The SEA does not describe a universal approach for non-priority and non-focus schools that would ensure consistent diagnostics and improvement planning using evidence from the multi-measure framework. • For the reasons described in 2Ai and 2B above, the SEA’s grading and accountability systems appears to give strong incentives to schools with relatively high-performing students; however, these systems do not appear to provide nearly as powerful incentives to schools with substantial numbers of low-performing students.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider adopting a statewide improvement planning approach that ensures all schools in the SEA engage in similar inquiry into performance and resource allocation.

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

2.F.ii Panel Response

Tally of Peer Responses: 3 Yes, 3 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The panel raised significant concerns about the appropriateness of the incentives to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English learners and students with disabilities. However, the SEA proposes reasonable supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA proposes use of transparent information as a key driver of public engagement and governance and leadership capacity (p. 92). • The SEA proposes providing incentives and supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination. • The Trailblazer initiative assists a network of LEAs seeking to avoid placement of their schools in the RSD to collaborate to improve student achievement in their schools. • The SEA has created a support system that clusters school districts with low performing schools with network teams according to similarities in needs and challenges in order to build capacity and ensure success.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is no specific discussion of English Learners or students with disabilities in the discussion of incentives or supports. • The transparent information provided by the SEA is of limited value to diagnosing the performance needs of all schools. For example, it does not provide information on the growth rates of disaggregated groups or information about the adequacy of student growth (growth to standard) for reaching college and career readiness (the percentage of students on track). Also, a strong focus on closing achievement gaps among disaggregated groups of students is not evident in the construction of the multi-measure framework used to provide information to the public and to provide incentives for school-level actions. • The linkage is unclear between grade level expectations articulated as part of the “Mission, Vision, and Strategy” (p. 93), performance levels on current assessments (including the meaning of “Basic”), and expectations for College and Career Readiness against the Common Core State Standards (CCSS). • For the reasons described in 2Ai and 2B above, the SEAs grading and accountability systems appears to give strong incentives to schools with relatively high-performing students and not to provide nearly as powerful incentives to schools with substantial numbers of low-performing students.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

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

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

2.G (including i, ii, and iii) Panel Response*Tally of Peer Responses: 5 Yes, 1 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>With the expectation that the substantial concerns in 2.A and 2.B above regarding the incentive structure created by the SEA accountability system will be addressed, the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around its priority schools, is likely to improve LEA capacity to support school improvement given the five-year duration of RSD status and the SEA’s ability to take necessary action during that time.</p> <p>Given the SEA’s strong authority and autonomy in intervening in its lowest performing schools through the RSD, including chartering new schools, the SEA’s process for providing support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA’s differentiated recognition, accountability, and support system (including through leveraging Federal funds) is likely to result in successful implementation of such interventions.</p>
<i>Strengths</i>	<ul style="list-style-type: none"> • The Trailblazer initiative assists a network of LEAs seeking to avoid placement of their schools in the RSD to collaborate to improve student achievement in their schools. • The SEA has created a support system that clusters school districts with low performing schools with network teams according to similarities in needs and challenges in order to build capacity and ensure success.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA did not describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools. • A key leading indicator of closing gaps is improved student longitudinal growth rates (above a year’s growth); however, this indicator is undeveloped in the SEA’s framework.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

Principle 2 Overall Review

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

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	A majority of the panel found that the SEA’s plan for developing and implementing its system of differentiated recognition, accountability, and support, may not adequately improve student achievement, close gaps, and improve the quality of instruction. The components of the SEA’s plan include a large number of strengths but also major weaknesses that led the panel to conclude that the plan does not create a coherent and comprehensive system that supports continuous improvement in the SEA, its LEAs, its schools, and its students. The weaknesses are largely related to the calibration of measures, which, without correction undermine incentives for improvement, the value of the information to the public, and the coherence of the overall accountability system.
<i>Strengths</i>	<ul style="list-style-type: none"> • The panel identified a number of strengths throughout Principle 2. For example: the SEA’s approach to intervening in priority schools through use of the RSD provides for the authority and autonomy to make dramatic, systemic changes. The RSD provides authority to modify all aspects of a school’s design, including changing staff without regard to tenure or collective bargaining, modify program, and adjust the use of time. • The SEA proposes providing incentives and supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination. • The SEA’s proposed system includes AMOs, or targets, for each indicator • The SEA’s differentiated support and intervention system with intensive interventions based on number of years rated as an Academically Unacceptable School (AUS), including AUS 1 to AUS 6+, (p. 41). Schools in AUS status for four consecutive years can be moved to the RSD where they must remain under the SEA’s direct management for five years.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The panel identified several key weaknesses in Principle 2. For example: the weighting described on p. 50 (Table 2.G) shows a status-based approach that deemphasizes student longitudinal growth, which is used only to provide bonus School Performance Score points (p. 64). This continues to reinforce a focus on students on the cusp of proficiency rather than maximizing growth rates for all students toward college and career readiness. This also makes the transparent information provided by the state of limited value to diagnosing the performance needs of all schools. • The rigor of expectations within the SEA’s AMOs does not provide incentives to improve the achievement and attainment of college and career readiness for low performing students: (1) setting 80 percent graduation rate as an “A” is a low bar. (p. 54); (2) a school meets combined subgroup AMOs with only 35 percent of students making expected longitudinal growth when an appropriate expectation would be greater than 50 percent (p. 63); (3) use of “Basic” as “Proficient” (p. 66), which is unlikely to reflect being on track to college and career readiness; and (4) the omission of subgroup or combined subgroup graduation rates from the AMOs in so far as they drive rewards and consequences. • Given that the goal of reaching 100 percent proficiency by 2014 is not attainable, as it continues to emphasize proficiency over growth and ensures many schools that show high student growth rates will continue to be labeled negatively. It is not clear that this is reasonable and useful to retain this goal. • The extent of coherence among the institutional and educator accountability systems proposed by the SEA is potentially jeopardized by fundamentally different performance frameworks. The system for evaluating schools is largely based on status measures and the system proposed for evaluating principals and teachers is largely based on longitudinal growth, which may produce conflicting signals of quality that may result in contradictory ratings of the school (based on status measures) and the percentage of effective teachers in the school (based on growth). • The SEA has neither described nor made clear the efficacy of using Basic rather than Mastery-level performance as evidence of college and career readiness. Getting this right is very important for a system that depends to such a great extent on status/attainment measures: the percentage of students reaching a specific learning destination.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The panel provided a variety of technical assistance (TA) suggestions throughout Principle 2. Some highlights include recommendations that the SEA should: consider a framework that equally values student growth rates (velocity of learning) and proficiency rates (reaching cut points) to ensure a focus on both the leading indicator of how fast a child is moving and the lagging indicator of reaching a destination (e.g., proficiency, graduation); reexamine the design of the multi-measure framework and weightings and rigor of indicators to consider how individual subgroup performance could be more consequential and how student longitudinal growth could be factored in to better report on school effectiveness and diagnose and target interventions focused on closing gaps; examine different thresholds for meets expectations under the Growth Among Non-Proficient Students AMO; consider raising the graduation rate expectation to 90 percent for schools rated an “A.” Consider establishing growth and status AMOs for each required disaggregated group; and substantially raise the AMO standard, currently set at 35 percent, for the percentage of students meeting or exceeding expected growth; and consider using mastery and advanced as the definition of proficient for SEA and ESEA purposes. • Additionally, the SEA should include subgroup and/or combined subgroup graduation rates in the AMOs in so far as they drive rewards and consequences.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A**:

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

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

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

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

Tally of Peer Responses: NA

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

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

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

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

Tally of Peer Responses: NA

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

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

If the SEA selected **Option B**:

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

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

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

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The minimum n-size of five (p. 109) that the SEA has adopted for value-added analyses that will provide 50 percent of the basis for high-stakes decisions under the SEA’s teacher evaluation system (COMPASS) is too low to satisfy this principle. • Aside from this and two other concerns noted below, the panel concluded that the SEA’s COMPASS system and the SEA’s planned implementation process are likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement. • The COMPASS system: The SEA is piloting a comprehensive teacher/leader-evaluation system with a 5-part evaluation scheme; measures of student learning (50 percent weight) and teacher/leader quality (also 50 percent weight); consequences; and processes for (a) creating measures of student learning for untested grades/subjects, (b) using the evaluation process and results to support teacher improvement planning and goal setting, and (c) inducing a fair degree of inter-rater reliability between different measures and different evaluators. • Implementation: LA state law (p. 100) requires the SEA to implement the system statewide in 2012-13, and the state is committed to meeting that deadline (p. 125). The SEA’s Logic Models, Detailed Pilot Implementation Plan, and High-Level Implementation Plan Template for the statewide roll-out (Apps. 3.F and 3.G.) provide reasonable confidence in the SEA’s ability to carry out its ambitious plan on schedule. • Concerns: The Panel’s main concerns are that the minimum n-size of five is too low for high stakes decisions; the number of observations (formal or informal) annually is too low to ensure continuous improvement; and the principal evaluation system is undeveloped.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p>The following features of COMPASS are strengths:</p> <ul style="list-style-type: none"> ○ Five part annual evaluation scheme (highly effective, effective/accomplished, effective/proficient, effective/emerging, ineffective), with 10 percent of teachers and leaders in top and bottom categories (p. 110) ○ Multiple measures: 50 percent student growth; 50 percent qualitative observation ○ For tested subjects/grades: state-certified common assessments (with Student Learning Targets); expanded SEA benchmark assessments aligned to CCSS; a new grade 2 assessment to extend by available data by one year (p. 112) ○ Subject to concerns about minimum n-size for high-stakes decisions, a defensible Value Added Measures (VAM) system (math, ELA) with moderate stability across years especially for educators receiving the lowest and highest rankings (p. 110; App. 3E at pp. 128, 137-140); well-considered control variables, including the appropriate treatment of English Learners and students with disabilities (App. 3E at pp. 140-44); and evidence that evaluation outcomes are not correlated with having low- nor high-proficiency students (App. 3E at pp. 144-45) ○ Educator validation of student VAM rosters (p. 110; App 3E) <ol style="list-style-type: none"> 1. For untested subjects/grades: periodic assessments and/or goal-setting (Student Learning Targets (SLTs)) and a requirement of a “strong body of evidence” of whether targets were met; rubrics for assessing the quality of the SLTs and of the body of evidence (p. 111; see App 3C, pp. 115-17) 2. Educator engagement in developing measures of student learning and SLTs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities (p. 35, 112) <ul style="list-style-type: none"> ○ A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21) ○ Educator-created rubrics for observation-based evaluations, including “just right” number (12) of criteria (pp. 107-08 & App. 3A at pp. 108-14); CCSS-aligned materials (p. 114): walkthrough forms; self-assessment and other tools; observation and feedback guides; library of videos aligned to rubric indicators (pp. 106 & chart) ○ Teacher improvement planning (Professional Growth Plans) and goal setting that informs and is informed by evaluations (p. 105); Intensive Assistance Programs (IAP) for “ineffective” teachers (p115) ○ Feedback to teacher/leader within 5 days (106) ○ Human Capital Information System to record and use fruits of both types of evaluations with access by SEA, LEAs, principals (to track their evaluations); and teachers (track their progress) (pp. 106, 109) ○ Non-promotion of novice teachers after 3 years of “ineffective” evaluations; revocation of certification for individuals “who demonstrate persistent ineffectiveness over time” (p. 115). ○ 2-year pilot of VAM (2009-2011); the extension of VAM without stakes to all schools (2011-2012); a small pilot of Student Learning Targets (SLTs) for untested grades and subjects (112); and a substantial pilot of whole system in Spring 2012, with the goal of full implementation in 2012-13 (117-189) ○ Collaboration with higher education to align teacher prep curriculum to teacher evaluation standards; system for linking student outcomes back to teacher preparation programs (pp. 115-16). 3. Pilot implementation logic model, Detailed Pilot Implementation Plan and Implementation Plan Template (mapping SEA, LEA and school implementation responsibilities on a weekly basis (App. 3F., 3G).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Minimum n-size of five is too low for purposes of attributing value added to a teacher for high stakes purposes (p. 109). • One formal and one informal observation each year is insufficient to guide continuous improvement. • Dividing the ratings between one category of ineffective and four categories of effective and applying consequences only to educators in the ineffective category allows chronically low performing (“emerging”) educators to remain in classrooms and schools. • There is a lack of detail in the flexibility request on: <ul style="list-style-type: none"> ○ The implementation framework for 2012-13 statewide roll-out (as opposed to the well-documented pilot plan). ○ Rewards and career ladders for highly effective teachers (cf. pp. 113, 115). ○ Measures to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107). ○ Assuring appropriate implementation of the observation rubric when evaluating instruction of students with disabilities and English Learners, including in general education classes (cf. p. 112). ○ Commitment to track teacher placement and avoid assignment of low-performing teachers to classes and schools with students most in need (p. 116).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Raise the minimum n-size to 20 or above for value-added measures used for high-stakes decisions and consider multi-year accumulation of evidence to increase n-size. • Consider increasing the minimum number of teacher and leader observations over the year to ensure continuous improvement and targeted professional development. • Provide more detail or develop plan on: <ul style="list-style-type: none"> ○ Timeline, framework for 2012-2013 statewide implementation, including training and support. ○ Career implications of “highly effective” rating (career ladders and rewards) ○ Improvement planning and goal setting for leaders ○ Steps to achieve within-, across-school and across-district rater-reliability on 12 qualitative norms in the observation rubrics, quality of SLTs and what counts as a “strong body of evidence” ○ Steps to track teacher placement to avoid assignment of low-performing teachers to classes and schools with students most in need ○ Strategy for assuring validity and reliability of observations of instruction of students with disabilities and English Learners and for improvement planning, goal setting, feedback and intensive assistance planning for teachers of students with disabilities and English Learners. • Reconsider the 5-point evaluation scale: Will the choice of including an “Accomplished” and “Proficient” level between “Highly Effective” and “Emerging” require a degree of accuracy in differentiating performance that is not supported by the data (p. 109)? Will evaluator training address this problem? Consider running simulations using the proposed 5-level systems with one that combines “Accomplished” and “Proficient” and determine if the data distribution supports one or the other. • The SEA should consider requiring teachers that remain in the emerging category for a specific period of time to be classified as ineffective.

ii. Note to Peers: Staff will review ii.

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

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

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • There was sufficient involvement of teachers and principals in the development of these guidelines. • Teachers were heavily involved in formulating first the outlines, then the details, of the teacher evaluation rubrics and strategies for measuring student growth in untested grades and subjects, and in piloting the system. Teachers are active participants in the evaluation process itself, through Professional Growth Plans, target setting, setting Student Learning Targets (SLTs) for assessments and student portfolios covering untested grades and subjects. • There is less information on the engagement of principals and assistant principals in developing the leader evaluation system.
<i>Strengths</i>	<ul style="list-style-type: none"> • Teachers and their unions, principals and assistant principals, superintendents, deans/professors in colleges of education, parents, legislators were engaged in identifying teacher and leader competencies, performance standards and measures of student growth for non-tested grades and subjects via the Advisory Committee on Educator Effectiveness (ACEE) (2010-2011), workgroups, focus groups, webinars, surveys, statewide pilots (pp. 11-12, 101-104 & chart; pp. 111-12). • A considerable number of superintendents, educators and union representatives, parents, school board members, representatives of English Learners and students with disabilities took part in these activities (p. 102). • The SEA conducted multiple stakeholder engagement activities for each of 10 components of the system (pp. 103-04).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • None noted.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

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

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

a. Will be used for continual improvement of instruction ?

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

3.A.ii.a Panel Response

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

Tally of Peer Responses: 3 Yes, 3 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The performance management cycle the SEA described (p. 105) may result in continual improvement of instruction. The SEA recognizes that “measuring and reporting performance metrics alone has rarely led to dramatic organizational improvement and outcomes” and requires “implementation of an educator support and evaluation model that incorporates qualitative and growth measures as part of a fair and rigorous performance management process” that combines multiple-measure evaluation, improvement planning, goal setting, and a focus on results to drive continuous improvement.” However, the Panel was divided on the extent to which COMPASS, as currently designed, is able to accomplish this objective.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p>COMPASS's strengths include:</p> <ol style="list-style-type: none"> 1. Periodic assessments and/or goal-setting (Student Learning Targets (SLTs)) and a requirement of a “strong body of evidence” of whether targets were met; rubrics for assessing the quality of the SLTs and of the body of evidence (p. 111; see App 3C, pp. 115-17) 2. A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21) 3. Educator-created rubrics for observation-based evaluations, including “just right” number (12) of criteria (pp. 107-08 & App. 3A at pp. 108-14); CCSS-aligned materials (p. 114): walkthrough forms; self-assessment and other tools; observation and feedback guides; library of videos aligned to rubric indicators (pp. 106 & chart) 4. Educator engagement in developing measures of student learning and SLTs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities (p. 35, 112) 5. Teacher improvement planning (Professional Growth Plans) and goal setting that informs and is informed by evaluations (p. 105); Intensive Assistance Programs (IAP) for “ineffective” teachers (p115) 6. Feedback to teacher/leader within 5 days (106) 7. Human Capital Information System to record and use fruits of both types of evaluations with access by SEA, LEAs, principals (to track their evaluations); and teachers (track their progress) (pp. 106, 109) 8. Alignment of CCSS and COMPASS training and materials (p. 114) 9. Collaboration with higher education to align teacher preparation curriculum to teacher evaluation standards (116) 10. System to link student outcomes back to teacher preparation programs (pp. 115-16)
<i>Weaknesses, issues, lack of clarity</i>	<p>COMPASS's weaknesses include:</p> <ul style="list-style-type: none"> • Lack of detail on: <ul style="list-style-type: none"> ○ Measures to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107). ○ Steps to assure proper application of the observation rubric to instruction of students with disabilities and English Learners (cf. p. 112.) • Minimum n-size of 5, which is too low to provide valid information to support continuous improvement (p. 109). • Insufficient minimum numbers of observations for guiding continuous improvement.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Provide more detail or develop plan on: <ul style="list-style-type: none"> ○ Other career implications of “highly effective” ratings (career ladders and rewards). ○ Improvement planning and goal setting for leaders. ○ Steps to achieve within-, across-school and across-district rater-reliability on 12 qualitative norms in the observation rubrics, quality of SLTs and what counts as a reliable “body of evidence”. • Develop strategy for assuring validity and reliability of measures of student learning and observation rubrics for teachers of students with disabilities and English Learners and for their improvement planning, goal setting, feedback and intensive assistance planning. • Consider increasing the minimum number of teacher and leader observations over the year (formative or summative) to ensure continuous improvement and targeted professional development. • Raise the minimum n-size to 20 or above and consider multi-year accumulation of evidence to increase n-size.

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

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

3.A.ii.b Panel Response

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

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Some members of the panel concluded that the minimum n-size of 5 is too low to satisfy this principle. Otherwise, the panel concluded that the SEA’s evaluation system and commitment to identifying 10 percent of Teachers in the top (Highly Effective) and bottom (Ineffective) categories, 15 percent in the next highest (Effective: Accomplished) and lowest (Effective-Emerging) categories, leaving 50 percent in the middle (Effective: Proficient) is likely to meaningfully differentiate performance using at least three performance levels.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p>Strengths of the evaluation system include:</p> <ul style="list-style-type: none"> • Differentiated annual evaluation scheme (highly effective, effective/accomplished, effective/proficient, effective/emerging, ineffective), with 10 percent of teachers and leaders in top and bottom categories (p. 110). • Multiple measures: 50 percent student growth; 50 percent qualitative observation. • 10 percent-15 percent-50 percent-15 percent-10 percent distribution of ratings (Table 3E on p. 110). • A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • A minimum n-size of five students is too low for purposes of high stakes decisions. • The choice of including an “Accomplished” and “Proficient” level between “Highly Effective” and “Emerging” will require a degree of accuracy in differentiating performance that may not be supported by the data (p. 109). • Defining teachers in 11th to 25th percentiles as “Effective,” albeit “Emerging” is questionable (p. 110).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Raise the minimum n-size to 20 or above of value-added measures used for high-stakes decisions and consider multi-year accumulation of evidence to increase n-size. • Reconsider the five-point evaluation scale: Will the choice of including an “Accomplished” and “Proficient” level between “Highly Effective” and “Emerging” require a degree of accuracy in differentiating performance that is not supported by the data (p. 109)? Will evaluator training address this problem? Consider running simulations using the proposed 5-level systems with one that combines “Accomplished” and “Proficient” and determine if the data distribution supports one or the other.

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

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

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

Tally of Peer Responses: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The minimum n-size is too low to satisfy this principle. Otherwise, the panel concluded that COMPASS uses valid measures for 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. More attention to inter-rater reliability within- and across-schools and across-LEAs – including norming of standards for the 12 rubric indicators, SLTs, and standards for a “strong body of evidence” – would strengthen it further.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p>Strengths include:</p> <ul style="list-style-type: none"> • Multiple measures: 50 percent student growth; 50 percent qualitative observation • State-certified common assessments (with Student Learning Targets (SLTs)); expanded state benchmark assessments aligned to CCSS; a new grade 2 assessment to extend by available data by 1 year (p. 112). • Subject to concerns about minimum n-size for high-stakes decisions, a defensible Value Added Measures (VAM) system (math, ELA) with moderate stability across years especially for educators receiving the lowest and highest rankings (p. 110; App. 3E at pp. 128, 137-140); well-considered control variables, including the appropriate treatment of English Learners and students with disabilities (App. 3E at pp.140-44); and evidence that evaluation outcomes are not correlated with having low- nor high-proficiency students (App. 3E at pp. 144-45). • Educator validation of student VAM rosters (p. 110; App 3E). • Periodic assessments and/or goal-setting (SLTs) and a requirement of a “strong body of evidence” of whether targets were met; rubrics for assessing the quality of the SLTs and of the body of evidence (p. 111; see App 3C, pp. 115-17). • A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21). • Educator-created rubrics for observation-based evaluations, including “just right” number (12) of criteria (pp. 107-08 & App. 3A at pp. 108-14). • Teacher improvement planning (Professional Growth Plans) and goal setting that informs and is informed by evaluations (p. 105); Intensive Assistance Programs (IAP) for “ineffective” teachers (p. 115). • Human Capital Information System to record and use fruits of both types of evaluations with access by SEA, LEAs, principals (to track their evaluations); and teachers (track their progress) (pp. 106, 109) • 2-year pilot of VAM (2009-2011); extension of VAM without stakes to all schools (2011-2012); small pilot of SLTs (p.112); and substantial pilot of the whole system in Spring 2012.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The minimum n-size of five is too low to make valid and reliable inferences in support of high stakes decisions. • There is a lack of detail on measures to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107). • There is insufficient detail on how the SEA will assure reliable application of the observation rubric to the instruction of students with disabilities and English Learners (cf. p. 112).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should provide more detail or develop plan for achieving within-, across-school and across-district inter-rater reliability on 12 qualitative norms in the observation rubrics, quality of SLT's and what counts as a “strong body of evidence”. • The SEA should develop strategy for assuring validity and reliability of observation of instruction of students with disability and English Learners. • The SEA should increase the minimum n-size.

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

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

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA has defined a statewide approach for measuring student growth on assessments that are required under ESEA section 1111(b)(3).
<i>Strengths</i>	<ul style="list-style-type: none"> • None noted.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • None noted.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

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

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

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

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA specifies the measures of student growth that LEAs must use for grades and subjects in which assessments are not required under ESEA section 1111(b)(3). Further attention to inter-rater reliability will help ensure that LEAs are using valid measures.
<i>Strengths</i>	<ul style="list-style-type: none"> • Strengths of the COMPASS system include: • Periodic assessments and/or goal-setting (STLs) and a requirement of a “strong body of evidence” of whether targets were met (p. 111; see App 3C, pp. 115-17). • A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21). • Educator-created rubrics for observation-based evaluations • Human Capital Information System (pp. 106, 109). • Educator engagement in developing measures of student learning and STLs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities (p. 35, 112).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is a lack of detail on strategies to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, the rubric for measuring quality of STLs, and for identifying a “strong body of evidence” (cf. p. 107). These concerns are especially important in a statewide system. • There is a lack of detail on how the SEA will assure reliable application of the observation rubric to instruction of students with disabilities and English Learners.

<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should provide more detail or develop plan on steps to achieve within-, across-school and across-district inter-rater-reliability on the 12 qualitative norms in the observation rubrics, the rubric for assessing the quality of SLTs, and the standards for what counts as a “strong body of evidence” • The SEA should develop strategy for assuring reliable application of the observation rubric to instruction of students with disabilities and English Learners. • The SEA should consider use of the SLT process as a wrap-around strategy for tested and non-tested grades and subjects to solidify consistent practices and collaboration related to inquiring into evidence of student performance.
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d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The evaluations are annual.
<i>Strengths</i>	<ul style="list-style-type: none"> • The evaluations are annual.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There are an insufficient minimum number of observations (formative or summative) for guiding continuous improvement.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • None noted.

e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?

- *Will the SEA’s guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*
- *Are the SEA’s guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e Panel Response

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

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<p>The observation and feedback cycle the SEA describes (p. 105) may result in the provision of clear, timely, and useful feedback, including feedback that identifies needs and guides professional development. The SEA recognizes that “measuring and reporting performance metrics alone has rarely led to dramatic organizational improvement and outcomes” and requires “implementation of an educator support and evaluation model that incorporates qualitative and growth measures as part of a fair and rigorous performance management process” that combines multiple-measure evaluation, improvement planning, goal setting, and a focus on results to drive continuous improvement.” However, the Panel was divided on the extent to which COMPASS, as currently designed, will accomplish this objective.</p>
<i>Strengths</i>	<p>COMPASS’s strengths include:</p> <ul style="list-style-type: none"> • Periodic assessments and/or goal-setting (Student Learning Targets (SLTs)) and a requirement of a “strong body of evidence” of whether targets were met; rubrics for assessing the quality of the SLTs and of the body of evidence (p. 111; see App 3C, pp. 115-17). • A commitment to compare results of different types of assessments and observations to assess reliability across methods (pp. 120-21). • Educator-created rubrics for observation-based evaluations, including “just right” number (12) of criteria (pp. 107-08 & App. 3A at pp. 108-14); CCSS-aligned materials (p. 114): walkthrough forms; self-assessment and other tools; observation and feedback guides; library of videos aligned to rubric indicators (p. 106 & chart). • Educator engagement in developing measures of student learning and SLTs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities (pp. 35, 112). • Teacher improvement planning (Professional Growth Plans) and goal setting that informs and is informed by evaluations (p. 105); Intensive Assistance Programs (IAP) for “ineffective” teachers (p. 115). • Feedback to teacher/leader within five days (p. 106). • Human Capital Information System to record and use the fruits of both types of evaluations with access by SEA, LEAs, principals (to track their evaluations); and teachers (track their progress) (pp. 106, 109).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There is a lack of detail on strategies to assure inter-rater reliability across schools, LEAs and evaluators, including: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107). • There is a lack of detail on how the SEA will ensure (1) the reliable application of the observation rubric and (2) the provision of effective feedback following the observation of instruction of students with disabilities and English Learners.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should provide more detail or develop a plan for achieving within-, across-school and across-district inter-rater reliability on the 12 qualitative norms in the observation rubric, quality of SLTs, and what counts as a “strong body of evidence.” • The SEA develop a strategy for assuring the validity and reliability of observation of instruction of students with disabilities and English Learners and the adequacy of feedback following those observations.

f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	COMPASS will be used to inform personnel decisions. The SEA recognizes the breadth of the human capital continuum and commits itself to using the results of the COMPASS system at all “Opportunities for Impact” (p. 113).
<i>Strengths</i>	<ul style="list-style-type: none"> • The SEA commits to using the results of the evaluation system across the full range of “Opportunities for Impact”, and lists 7 stages of the human capital continuum where such opportunities arise (p. 112). • The SEA commits to remove novice teachers after three years of “ineffective” evaluations, to “revoke certification for individuals who demonstrate persistent ineffectiveness over time,” and to reward and recognize effective teachers (p. 115).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The flexibility request is does not provide much detail on steps that will be taken to recognize, reward, and provide attractive career ladders for highly effective teachers (cf. pp. 113, 115). • The SEA provides little detail on how it will track teacher placement and avoid assignment of low-performing teachers to classes and schools with students most in need (p. 116). • The mechanism the SEA plans to use to evaluate principals on the percentage of effective teachers in their buildings is unclear. • The SEA does not describe the system of planning and target setting for principals.
<i>Technical Assistance Suggestions</i>	<p>The SEA should provide more detail or develop a plan on:</p> <ul style="list-style-type: none"> • Rewards and career ladders for highly effective teachers • Improvement planning and goal setting for leaders • Steps to track teacher placement to avoid assignment of low-performing teachers to classes and schools with students most in need. • Steps to evaluate principals based on the percentage of effective teachers in their buildings

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

- 3.B** Is the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA’s adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?
- *Does the SEA have a process for reviewing and approving an LEA’s teacher and principal evaluation and support systems to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems?*
 - *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
 - *Did the SEA describe the process it will use to ensure that all measures used in an LEA’s evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
 - *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA’s teacher and principal evaluation and support systems?*
 - *Is the SEA’s plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
 - *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
 - *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
 - *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA’s evaluation and support systems?*

3.B Panel Response

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements evaluation and support systems will likely lead to high-quality local implementation. Members of the panel continue to be concerned about the impact of the minimum n-size of 5 for consequential decisions.
<i>Strengths</i>	<ul style="list-style-type: none"> • The adoption of a legislatively mandated uniform statewide evaluation system avoids difficulties faced elsewhere as to LEA capacity and compliance, although success will depend heavily upon the effectiveness of the state’s train-the-trainer implementation strategy. • Other strengths include: <ul style="list-style-type: none"> ○ The two-year pilot of VAM (‘2009-2011), followed by the extension of VAM without stakes to all schools (‘2011-2012) and a small pilot of Student Learning Targets (SLTs) for untested grades and subjects (p. 112) and then a substantial pilot of the whole system in Spring 2012, with the goal of full implementation in 2012-13 (pp. 117-19); ○ The networking of LEAs not in pilot with ones that were in the pilot, to facilitate the statewide roll-out, using the Trailblazers model (p. 128); ○ Collaboration with higher education to align teacher prep curriculum to teacher evaluation standards; system to link student outcomes back to teacher prep programs (pp. 115-16); and ○ A pilot implementation team logic model, Detailed Pilot Implementation Plan (Jan-June 2012), and detailed pilot Implementation Plan Template (mapping SEA, LEA and school implementation responsibilities on weekly basis from December 2011 to December 2012) (App. 3F, 3G).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The SEA provides little detail on its approach to principal evaluations, raising doubt about whether those evaluations will be implemented in a time and rigorous manner. • The SEA provides considerably less detail on the implementation plan for the statewide roll-out of teacher evaluations in 2012-13 than is provided in regard to its most recent pilot. • There is a lack of detail on measures to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107). • The minimum n-size of five students for high-stakes attribution to teachers is too low.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider phasing in statewide roll out or demonstrate capacity of state to carry out the training and oversight required for the massive task of a roll-out statewide in a single year. • The SEA should add detail on measures to assure inter-rater reliability across schools, LEAs and evaluators: how the SEA will norm the standards in the observation rubric, in the rubric for measuring the quality of SLTs, and for identifying a “strong body of evidence” (cf. p. 107).

Principle 3 Overall Review

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

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

Principle 3 Overall Review Panel Response*Tally of Peer Responses: 2 Yes, 4 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • The COMPASS system: Louisiana is piloting a comprehensive teacher/leader-evaluation system with a 5-part evaluation scheme; measures of student learning (50 percent weight) and teacher/leader quality (50 percent weight); consequences; and processes for (a) creating measures of student learning for untested grades/subjects, (b) using the evaluation process and results to support teacher improvement via planning and goal setting, and (c) inducing a fair degree of inter-rater reliability between different measures and different evaluators. Clarification would be helpful as to (a) the number of observations evaluators will make of each leader or teacher; (b) the usual process for granting, renewing and revoking teacher certification and the effect of the new evaluations on these other career-related possibilities; (c) the process for “norming” qualitative measures across evaluators; and (d) how the state will monitor the quality of Student Learning Targets and whether a quality “body of evidence” is presents. • Implementation: Louisiana state law (p. 100) requires the SEA to implement the system statewide in 2012-2013, and the state is committed to meeting that deadline (p. 125). The flexibility request’s description in this regard is a bit out of date and lacks detail on the implementation framework beyond the current pilot, but the Logic Models, Detailed Pilot Implementation Plan (Jan.-June 2012) and High-Level Implementation Plan Template for the statewide roll-out (Dec. 2011-Dec. 2012) (App. 3.F, 3.G.) provide some confidence on this score. • Overall: Despite these concerns, the information provided permits a substantial degree of confidence about the state’s commitment and capacity to implement a system that will improve instruction and student outcomes. Five part annual evaluation scheme (highly effective, eff./accomplished, eff./proficient, eff./emerging, ineffective)

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p>COMPASS contains many elements that are strengths including:</p> <ul style="list-style-type: none"> • The use of multiple measures such as classroom observations, teaching artifacts (e.g., lesson plans, professional development certifications), state-certified common assessments (with Student Learning Targets), expanded state benchmark assessments aligned to CCSS, and periodic assessments and/or goal-setting (Student Learning Targets (SLTs)); • The reliance on educators in developing measures of student learning and SLTs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities; • The use of educator-created rubrics for observation-based evaluations, CCSS-aligned materials, self-assessment, observation and feedback guides, and a library of videos aligned to rubric indicators; • The inclusion of a teacher improvement planning (Professional Growth Plans) and goal setting process that informs and is informed by evaluations and an Intensive Assistance Programs (IAP) for “ineffective” teachers; • The requirement that feedback be given to teachers and leaders within five days; • The plan to pilot the system’s features such as the 2-year pilot of VAM (2009-2011); the extension of VAM without stakes to all schools (2011-2012); a small pilot of Student Learning Targets (SLTs) for untested grades and subjects; and a substantial pilot of whole system in Spring 2012, with the goal of full implementation in 2012-13; • Collaboration with higher education to align teacher preparation curriculum to teacher evaluation standards; and a system for linking student outcomes back to teacher preparation programs; and • A detailed Implementation Plan Template that maps SEA, LEA and school implementation responsibilities on a weekly basis. • See other strengths provided throughout this principle.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The minimum n-size of five students for high-stakes attribution to teachers is too low. • One formal and one informal observation each year is insufficient to guide continuous improvement. • The SEA has not articulated a strategy to ensure inter-rater reliability across LEAs, schools, and evaluators. • The SEA has not provided sufficient detail on its approach to principal evaluations, raising doubt about whether those evaluations will be implemented in a timely and rigorous manner. • See other weaknesses provided throughout this principle.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should raise the minimum n-size to 20 or above and consider multi-year accumulation of evidence to increase n-size when the results are used for high stakes decisions. • The SEA should consider increasing the required number of teacher and leader observations over the year to ensure targeted professional development and continuous improvement for educators. • The SEA should develop a strategy to ensure inter-rater reliability across LEAs, schools and evaluators. • The SEA should see other technical assistance suggestions provided throughout this principle.

Overall Request Evaluation

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

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	<p>While the SEA's flexibility request has many promising elements that would likely lead to an increase in the quality of instruction for students and improved student achievement, it also has some major flaws that undermine these objectives. For example, the incentive structure created by the SEA accountability system (as discussed in 2.A and 2.B previously) is problematic and may not lead to either improved academic achievement or college and career readiness for low performing students. Additionally, setting a minimum n-size of five for attributing teacher effectiveness for high stakes decisions threatens to undermine the efficacy of the SEA's approach to increasing educator effectiveness.</p> <p>Many elements of this flexibility request are strong, including: the SEA's plan for transitioning to and implementing college- and career-ready standards; the SEA's process for providing support for implementation of interventions in priority schools, focus schools and other Title I schools; and the SEA's comprehensive and cohesive approach to improving educator effectiveness.</p>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p><u>Principle 1:</u></p> <ul style="list-style-type: none"> • The SEA conducted an alignment study to analyze the degree of match or overlap between the SEAs current Grade-Level Expectations and CCSS. • The SEA is revising assessment resources to align with the transitional and new curriculum and assessments throughout the 2011-2012 school year. • Professional development regarding the new Louisiana Comprehensive Curriculum will be provided concurrently with implementation, including specific content standards as well as effective strategies and modeling to teach them. • The SEA described several activities to support students with disabilities including expanding resources on the its website serving educators and families of students with disabilities, restructuring the SEA including the dispersing of special education personnel throughout the agency, training and professional development for special education professionals (e.g., Inclusion Matters conference), and a LA State Personnel Grant (pp. 32-35) • The SEA described several activities to support English Learners. It is a member of the English Learner State Collaborate on Assessment and Student Standards (SCASS) and support State Collaborate on English Language Acquisition (SCELA). The SEA participated in an 18-month study that systematically examined the four language modalities assessed under Title III. <p><u>Principle 2:</u></p> <ul style="list-style-type: none"> • The SEA’s approach to intervening in Priority Schools through use of the Recovery School District (RSD) provides for the authority and autonomy to make dramatic, systemic changes. The RSD provides authority to modify all aspects of a school’s design, including changing staff without regard to tenure or collective bargaining, modify program, and adjust the use of time. • The SEA proposes providing incentives and supports for other Title I schools that include intensive CCSS and COMPASS training (p. 68), data publication, administrative burden reduction through streamlining compliance requirements, planning and budgeting tools, and funding stream consolidation and coordination. • The proposed system includes AMOs (targets) for each indicator • Differentiated support and intervention system with intensive interventions based on number of years rated as an Academically Unacceptable School (AUS 1 to AUS 6+), p. 41. Schools in AUS status for 4 consecutive years can be moved to the Recovery School District where they must remain under state direct management for 5 years.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<p><u>Principle 3:</u></p> <ul style="list-style-type: none"> • COMPASS contains many elements that are strengths including: <ul style="list-style-type: none"> ○ The use of multiple measures such as classroom observations, teaching artifacts (e.g., lesson plans, professional development certifications), state-certified common assessments (with Student Learning Targets), expanded state benchmark assessments aligned to CCSS, and periodic assessments and/or goal-setting (Student Learning Targets (SLTs)); ○ The reliance on educators in developing measures of student learning and SLTs for untested-grades/subjects for teachers of career and technical education, physical education, foreign languages, English Learners, gifted and talented students and students with disabilities; ○ The use of educator-created rubrics for observation-based evaluations, CCSS-aligned materials, self-assessment, observation and feedback guides, and a library of videos aligned to rubric indicators; ○ The inclusion of a teacher improvement planning (Professional Growth Plans) and goal setting process that informs and is informed by evaluations and an Intensive Assistance Programs (IAP) for “ineffective” teachers; ○ The requirement that feedback be given to teachers and leaders within five days; ○ The plan to pilot the system’s features such as the 2-year pilot of VAM (2009-2011); the extension of VAM without stakes to all schools (2011-2012); a small pilot of Student Learning Targets (SLTs) for untested grades and subjects; and a substantial pilot of whole system in Spring 2012, with the goal of full implementation in 2012-13; ○ Collaboration with higher education to align teacher preparation curriculum to teacher evaluation standards; and a system for linking student outcomes back to teacher preparation programs; and ○ A detailed Implementation Plan Template that maps SEA, LEA and school implementation responsibilities on a weekly basis.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<p><u>Principle 1:</u></p> <ul style="list-style-type: none"> • The timeline outlined in the flexibility request and addendum shows a transition period for grades 3-12 that raises concerns about full implementation within the timeline and exposure of all students to rigorous college and career ready content. • The SEA has decided not to adopt transitional assessments or to augment the existing assessments or change cut scores on its existing state assessments despite relatively high levels of proficiency that are unlikely to correspond to college and career readiness. • The flexibility request does not provide specific information about instructional materials and supports being developed for teachers of students with disabilities and English Learners. <p><u>Principle 2:</u></p> <ul style="list-style-type: none"> • The weighting described on p. 50 (Table 2.G) shows a status-based approach that deemphasizes student longitudinal growth, which is used only to provide bonus School Performance Score points (p. 64). This continues to reinforce a focus on students on the cusp of proficiency rather than maximizing growth rates for all students toward college and career readiness. This also makes the transparent information provided by the state of limited value to diagnosing the performance needs of all schools. • The rigor of expectations within the SEA’s AMOs does not provide incentives to improve the achievement and attainment of college and career readiness for low performing students: (1) setting 80 percent graduation rate as an “A” is a low bar. (p. 54); (2) a school meets combined subgroup AMOs with only 35 percent of students making expected longitudinal growth when an appropriate expectation would be greater than 50 percent (p. 63); (3) use of “Basic” as “Proficient” (p. 66), which is unlikely to reflect being on track to college and career readiness; and (4) the omission of subgroup or combined subgroup graduation rates from the AMOs in so far as they drive rewards and consequences.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Given that the goal of reaching 100 percent proficiency by 2014 is not attainable, as it continues to emphasize proficiency over growth and ensures many schools that show high student growth rates will continue to be labeled negatively. It is not clear that this is reasonable and useful to retain this goal. • The extent of coherence among the SEA’s proposed institutional and educator accountability systems is potentially jeopardized by fundamentally different performance frameworks. The system for evaluating schools is largely based on status measures and the system proposed for evaluating principals and teachers is largely based on longitudinal growth, which may produce conflicting signals of quality that may result in contradictory ratings of the school (based on status measures) and the percentage of effective teachers in the school (based on growth). • The SEA has neither described nor made clear the efficacy of using Basic rather than Mastery-level performance as evidence of college and career readiness. Getting this right is very important for a system that depends to such a great extent on status/attainment measures: the percentage of students reaching a specific learning destination. <p><u>Principle 3:</u></p> <ul style="list-style-type: none"> • The minimum n-size of students for high-stakes attribution to teachers is too low. • One formal and one informal observation each year is insufficient to guide continuous improvement. • The SEA has not articulated a strategy to ensure inter-rater reliability across LEAs, schools, and evaluators. <p>The SEA has not provided sufficient detail on its approach to principal evaluations, raising doubt about whether those evaluations will be implemented in a timely and rigorous manner.</p>

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<p><u>Principle 1:</u></p> <ul style="list-style-type: none"> • Given the transitional nature of the timeline, determine a means for students in grades 3-12 to have access to more rigorous content, e.g., teach algebra in grade 8. • Consider changing cut scores on the existing state assessments to better correspond to college and career readiness. • Clarify that the alternative assessment being developed is aligned with CCSS. • Develop a more comprehensive, detailed, and coordinated plan to support teachers of students with disabilities and English Learners in the CCSS transition. <p><u>Principle 2:</u></p> <ul style="list-style-type: none"> • Consider a framework that equally values student growth rates (velocity of learning) and proficiency rates (reaching cut points) to ensure a focus on both the leading indicator of how fast a child is moving and the lagging indicator of reaching a destination (e.g., proficiency, graduation). • Reexamine the design of the multi-measure framework and weightings and rigor of indicators to consider how individual subgroup performance could be more consequential and how student longitudinal growth could be factored in to better report on school effectiveness and diagnose and target interventions focused on closing gaps. • Examine different thresholds for meets expectations under the Growth Among Non-Proficient Students AMO. Consider raising the graduation rate expectation to 90 percent for schools rated an “A.” Consider establishing growth and status AMOs for each required disaggregated group. • Substantially raise the AMO standard, currently set at 35 percent, for the percentage of students meeting or exceeding expected growth. • Consider using mastery and advanced as the definition of proficient for SEA and ESEA purposes. • Include subgroup and/or combined subgroup graduation rates in the AMOs in so far as they drive rewards and consequences. <p><u>Principle 3:</u></p> <ul style="list-style-type: none"> • Raise the minimum n-size to 20 or above and consider multi-year accumulation of evidence to increase n-size when the results are used for high stakes decisions. • Consider increasing the required number of teacher and leader observations over the year to ensure targeted professional development and continuous improvement for educators. • Develop a strategy to ensure inter-rater reliability across LEAs, schools and evaluators.