ESEA Flexibility

Peer Panel Notes

State Request: Oklahoma

Date: 12/07/11

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

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

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

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

CONSULTATION QUESTION 1 PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• SEA described meaningful engagement and solicitation of input from teachers and their representatives
Strengths	• Four methods of communication: surveys, focus groups, advisory committees, e-mail list serves • Solicited input about request and the principles themselves separately in an ongoing way • Reached out to teachers of ELs and provided them links to WIDA standards and alignment study
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

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

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

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

CONSULTATION QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	• SEA engaged and solicited input from other diverse communities
Strengths	• Hosted community engagement forum with representatives from diverse communities • Community members responded to online survey • Ongoing collaboration with other stakeholder groups including IDEA advisory panel, inter-tribal council, business coalition • Suggestions from comments and survey responses sometimes were reflected in modifications to State's plan
Weaknesses, issues, lack of clarity	• PTA felt parents were not meaningfully engaged (attachment p. 124) • Limited community input in statewide meeting and survey
Technical Assistance Suggestions	

Overview

Note to Peers: Staff will review Questions 1 and 3

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

OVERVIEW QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	• The overview did not include sufficient detail to show how the State would effectively implement an accountability system including all three principles that was comprehensive in nature
Strengths	• Articulated broad vision around college, career, and citizen-readiness (C3)
Weaknesses, issues, lack of clarity	• The overview touched on relevant topics such as CCSS and Teacher and Leadership Evaluation, but did not include identification of schools for intervention and the types of interventions that would support increased student achievement
Technical Assistance Suggestions	

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

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

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

1.B   Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013−2014 school year realistic, of high quality, and likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.B PANEL RESPONSE *Tally of Peer Responses:* 5 Yes, 2 No	
Rationale	• OK provided comprehensive framework for transitioning to CCSS
Strengths	• State has been focused on increasing rigor of standards for several years • There are plans to include focus on literacy and problem-solving skills across curriculum • Strategies for SWDs and ELs included; statewide training for educators of at-risk students offered that focuses on CCSS implementation • Comprehensive, phased, multi-year plan for implementing CCSS • REACH volunteer districts to provide regionally-based/peer support for implementation of CCSS sound promising as a way to facilitate ownership of the work to transition to CCSS • 60 REACH coaches to provide professional development and support implementation of CCSS housed in State university and CTE system • OK is part of 3 consortia for developing assessments including general assessment, EL proficiency assessment, and alternate assessments based on alternate achievement standards; all based on CCSS

1.B PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Weaknesses, issues, lack of clarity	• In strategies for SWDs and EL students, emphasis on remedial and developmental programs; no mention of accelerated programs to ensure that students are ready for college and career
	• SEA submits data on p. 37 related to participation in alternate assessments showing that 10% of total population is participating in Alternate Assessment based on Modified Achievement Standards (AA-MAS). State verified that only 40.3% of SWD take the general math assessment and 34.5% of SWD take the general reading assessment.
	• There is no transition plan to ensure students participating in MAS now will be prepared for PARCC assessment on CCSS
	• Results from crosswalk between CCSS and current standards not described
	• Results from survey of enacted curriculum are not described
	• While district volunteers for REACH sounds like a promising practice, could also be risky if districts aren't able to deliver on the plans and called for results
	• More specifics are needed on plans to develop and link data systems and timeline for its roll-out as it relates to successful implementation of CCSS and transition to new assessments
	• Transition timeline and evidence of success is not detailed (p.22); funding is noted as a possible obstacle to high quality support for implementation
	• Not clear exactly what will be involved in work with IHEs and principal training, master teacher programs around CCSS transition

1.B PANEL RESPONSE *Tally of Peer Responses:* 5 Yes, 2 No	
Technical Assistance Suggestions	• Implementation of retention by third grade legislation should focus on acceleration of students who are at-risk, focus on response to intervention for all students, and ensuring that the needs of ELs are addressed appropriately • Provide further specificity to address how WIDA standards are to be incorporated into CCSS curriculum to ensure ELs meet CCSS.

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

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

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

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

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

Principle 1 Overall Review

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

PRINCIPLE 1 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	• OK provided comprehensive framework for transitioning to CCSS
Strengths	• See 1.B
Weaknesses, issues, lack of clarity	• See 1.B
Technical Assistance Suggestions	• See 1.B

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

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

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

2.A.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• There are many promising elements of a comprehensive system for accountability and support, but it is not sufficiently developed to determine if it will be likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students
Strengths	• Includes subgroup performance in determining "pluses" and "minuses" in school grades • Includes high school graduation rate of low-achieving eighth graders in index • Focus on improving outcomes of previous low-performers in index

Weaknesses, issues, lack of clarity	• The strategy and structures described for differentiated recognition, accountability and support proposes an index-based measurement system not yet based on a growth model that may reinforce a focus on students on the cusp rather than all students. Focusing on level-to-level movement neglects potential substantial movement within performance levels, encouraging focus on students who are just below hitting a performance level.
	
	• Plan lists many elements "to be determined," such as (p. 30):
	
	    o high schools receiving credit for graduation rate
	
	    o how results from assessments will be weighted
	
	    o how whole-school improvement factors will be assessed and weighted, i.e. parent and community engagement factors, school culture indicators, other factors TBD

2.A.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Technical Assistance Suggestions	• Reconsider how grades are designated if there are discrepancies (p. 32) among different metrics, for example, the "D" rating related to the percent of effective teachers as compared to student achievement in the school (p. 33-34) • Ensure that test participation rate inclusion in multi-measure framework has some consequence to provide an incentive for schools and districts to maximize participation in statewide assessments • The State should reflect on the merits of moving forward with the proposed interim index system using the performance standard transition model prior to capability to measure growth within performance levels.

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: *4 Yes, 3 No*	
Rationale	• OK's plan is currently under development but does provide differentiated recognition, accountability, and support based on elements listed above
Strengths	• AMOs (in math, reading, participation, attendance, and graduation) are linked to school grading system • Oklahoma includes subjects in addition to reading and math in its accountability system • Oklahoma plans interventions beyond priority and focus schools

2.A.i.a PANEL RESPONSE Tally of Peer Responses: *4 Yes, 3 No*	
Weaknesses, issues, lack of clarity	• Elements of the A-F school grading system are not yet fully developed • Participation rate is only applicable to ELA and mathematics assessments. • Potential for graduation rate accountability to be less than federal law.
Technical Assistance Suggestions	

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

2.A.i.b PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• System creates incentives and provides support to close achievement gaps for all subgroups of students
Strengths	• AMOs are used to inform school grading which keeps the focus on subgroup performance • The focus on bottom 25% should include many students in low-performing subgroups • Grants are provided to high-performing schools that are willing to partner with low-performing schools to support continuous improvement
Weaknesses, issues, lack of clarity	• A-F school grading system is in its early stages of development. • While achievement gaps are discussed, it is not established how much weight will be given to graduation rates in the accountability system

2.A.i.b PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Technical Assistance Suggestions	• Investigate most productive ways to incentivize gap-closing and which of the multiple measures associated with AMOs, bottom 25%, and current method of measuring growth across performance levels send the most clear and productive signals to schools on where to focus efforts to close achievement gaps for all subgroups

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

2.A.i.c **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• Interventions for ELs and SWDs were not included
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

2.A.i.d **PANEL RESPONSE** *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	• Oklahoma's timeline indicated that they would have system in place no later than 2012-2013; however, many components are under development and interventions were not fully described
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

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

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

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

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

2.A.ii (INCLUDING QUESTIONS a AND b) **PANEL RESPONSE** *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	• Oklahoma provided the data for "all students" group that perform at the proficient level on the State's most recent administration of each additional assessment for all grades assessed • The weighting of the included assessments retains strong focus on reading and mathematics achievement
Strengths	• Inclusion of additional subjects • Provides percentages of student performance at acceptable and unacceptable levels from 2010-2011
Weaknesses, issues, lack of clarity	• The majority of SWDs participate in Alternate Assessments with high proficiency rates; description of how results are included is not addressed (only 40.3% of SWD take the general mathematics State assessments, Oklahoma Core Curriculum Tests and End of Instruction Tests). • Oklahoma's transition to incorporating additional assessments into its accountability system remains to be determined. Initially the writing science and social studies will not be included. Future weighting of these assessments in their A-F Grading system is uncertain.
Technical Assistance Suggestions	• Consider transition of SWDs that currently participate in Alternate Assessment based on Modified Assessment Standards (AA-MAS) to the PARCC assessments and CCSS
☐ *Not applicable because the SEA selected 2.A, Option A*	

2.B   Set Ambitious but Achievable Annual Measurable Objectives

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

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

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

    i.   Did the SEA provide the new AMOs and the method used to set these AMOs?

    ii.   Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?

    iii.   If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?

    iv.   Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups? (Attachment 8)

➢   _Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?_

➢   _Are these AMOs ambitious but achievable given the State's existing proficiency rates and any other relevant circumstances in the State?_

➢   _Will these AMOs result in a significant number of children being on track to be college- and career-ready?_

2.B AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE Tally of Peer Responses: 5 Yes, 2 No	
Rationale	• Oklahoma proposes new and ambitious AMOs that appear equally as rigorous to those proposed in this guidance.
Strengths	• Using AMOs in the A-F grading system contributes to focus on gap-closing • Criteria for Participation and Graduation Index requires disaggregation of data for subgroups and requires high performance levels • The growth component to the AMOs includes growth for the bottom 25%
Weaknesses, issues, lack of clarity	• Inclusion only of students enrolled within the first ten days may result in exclusion of many students from school accountability determinations • The longitudinal change in performance level, rather than growth on a continuous scale, may cause continued focus on the students who are on the cusp of proficiency • Oklahoma's use of the growth approach as described raises validity concerns because their tests may not demonstrate meaningful progression of content
Technical Assistance Suggestions	• Develop a model for calculating student learning gains based on progression across achievement spectrum upon implementation of a vertical scale for all statewide assessments, as described in Additional Submission 4A • To avoid unintended consequences of focus on "bubble students" and transition of students currently in AA-MAS to CCSS, look at districts that have successfully implemented systemic reform efforts that raise the bar for all students • To ensure public understanding of student performance, provide actual percentages of students at

2.B AND 2.B, OPTION C **(INCLUDING QUESTIONS i–iv)** **PANEL RESPONSE** Tally of Peer Responses: 5 Yes, 2 No	
	different performance levels in each academic subject by subgroup • Consider a method for maximizing the number of students, particularly those in traditionally low-performing subgroups that would be included for AMO calculation at the school and district level. For example, include those that attended school for the official count date and took the assessment in that school and for LEA AMOs, consider making it not dependent on which school within the LEA the student attended, but rather that they were in the LEA at the beginning of the year and at the time of assessment administration
☐ Not applicable because the SEA selected 2.B, Option A or Option B	

2.C   Reward Schools

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

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

➢ *Has the SEA provided a reasonable explanation of why its proposed recognition and, where applicable, rewards are likely to be considered meaningful by schools? For example, has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE Tally of Peer Responses: 7 Yes, 0 No	
Rationale	• Oklahoma provided a comprehensive approach to public recognition for high-performing and high-progress schools
Strengths	• Use of graduation rates to identify high schools • Describe extensive opportunities for non-monetary recognition • All subgroups must make AYP and schools must be closing gaps • Pairs grant opportunities with reward schools that are willing to partner with priority and focus schools • Rewards and recognitions were developed in conjunction with educators, making them more meaningful • Opportunities to serve as advisors to SEA
Weaknesses, issues, lack of clarity	• SIG schools cannot be identified as "high-progress" schools
Technical Assistance Suggestions	

2.D   Priority Schools

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

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

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

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

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

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

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

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

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

2.D.iii.a **(INCLUDING QUESTIONS (i)-(vii))** **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• Promising strategies are described but the systems are not yet built and current plan for interventions is not fully comprehensive and coherent
Strengths	• There is a description of criteria for evaluating district capacity to lead the turnaround effort is provided • Includes the option of C3S State intervention if that district's capacity is found lacking • Comprehensive approach to implementation of turnaround principles, not just choosing from a subset of principles.
Weaknesses, issues, lack of clarity	• Clear interventions aligned with turnaround principles are not described and therefore there is not a clear mechanism to describe how identified need is met with effective interventions • Not a strong focus on capacity-building at the LEA and school level, proposed school support team approach, which uses retired educators making periodic visits, (p. 73) has not been demonstrated as a strong enough support or intervention • C3S State takeover option is not well-developed and requires legislation and funding to enable it • The manner in which evidence against the capacity indicators for determining district capacity will be evaluated and how such determination will inform level of intervention in the LEA versus C3S takeover of the priority school was absent
Technical Assistance Suggestions	• Develop a way to assess the quality of evidence against the capacity indicators needed to demonstrate district capacity for implementation of turnaround principles. • Consider a redesign of the School Support Team (SST) approach by benchmarking high quality school review and follow-up support strategies to promote capacity building and sound diagnostics of need, including putting capacity building staff directly into schools and districts

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

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

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

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

2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes,7 No*	
Rationale	• Although Oklahoma provided turnaround principles, it is not demonstrated that they will be implemented in a way that is high quality, strategic, and coherent that will achieve i, ii, and iii
Strengths	• Proposal includes an online planning tool called Ways to Improve School Effectiveness (WISE) and a promising data review process, i.e. Oklahoma data model • SIG principal academy demonstrates focus on improving leadership in priority schools
Weaknesses, issues, lack of clarity	• Limited information was provided on interventions and how interventions will improve achievement for ELs and SWDs • Progress tracking and evaluation for turnaround interventions are not explained • The requirements with regard to 21st CCLC do not appear to be specifically connected to other turnaround strategies or interventions

2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes,7 No*	
Technical Assistance Suggestions	• Create single resource that describes available interventions and how they are expected to be applied in priority, focus, and other Title I schools • Connect specific interventions and resources with pyramid chart on page 69. Explain the relevance of specific interventions and resources for improving achievement for all students and subgroups and how progress will be tracked and evaluated.

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

2.D.iii.c PANEL RESPONSE *Tally of Peer Responses:* *7 Yes,0 No*	
Rationale	• Oklahoma has indicated that it will ensure that each of its priority schools implements the selected intervention for at least three years
Strengths	• Priority schools must continue to implement interventions even if they exit priority status before the three year period ends
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

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

2.D.iv PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	• Oklahoma's timeline on page 56 indicates that LEAs will have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

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

2.D.v and 2.D.v.a PANEL RESPONSE *Tally of Peer Responses:* 7 Yes,0 No	
Rationale	• Oklahoma provides exit criteria tied to the A-F grading system to determine when a school that is making significant progress in improving student achievement exits status
Strengths	• Priority schools must continue to implement intervention even if they exit priority status before the three year period ends
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• The criteria for returning school from C3S to the LEA should be linked to criteria for determining LEA capacity to implement turnaround principles

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2.E   Focus Schools

2.E.i   Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools?

2.E.i PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• Oklahoma described a methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools
Strengths	• Many different school districts appear in the list of focus schools • Strategic use of resources to address subgroup gap closing in schools with the biggest populations of subgroups
Weaknesses, issues, lack of clarity	• Method of determining focus schools tied to overall State population for subgroup has potential for masking subgroups with gaps in any school with a more homogeneous population • Methodology of looking at two or three lowest-performing subgroups potentially ignores low performance among other subgroups.
Technical Assistance Suggestions	• As focused interventions for subgroups identified in focus schools are developed, consider identifying all schools with substantial gaps and report that publicly. Provide online and statewide training opportunities to ensure other schools with those significant gaps can benefit from the interventions, whether or not they are identified as focus schools.

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

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

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

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

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

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

2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE *Tally of Peer Responses:* *7 Yes,0 No*	
Rationale	• Oklahoma identifies a number of focus schools equal to at least 10 percent of the State's Title I schools. The methodology identified focus school that have a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate. The methodology identifies focus schools that meet the requirement in (b) and (c.ii) above.
Strengths	
Weaknesses, issues, lack of clarity	• Method of determining focus schools tied to overall State population for subgroup has potential for masking subgroups with gaps in any school with a more homogeneous population • Methodology of looking at two or three lowest-performing subgroups potentially ignores low performance among other subgroups
Technical Assistance Suggestions	• Expand methodology to include all subgroups and not limit it to two for graduation rates or three for achievement • The State might still decide to target interventions and resources in particular schools, but all schools with large gaps should be identified and publicly reported

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

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

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

2.E.iii PANEL RESPONSE *Tally of Peer Responses:* 0 Yes,7 No	
Rationale	• Oklahoma did not provide specifics related to interventions that are effective at closing achievement gaps
Strengths	• Retains focus on parent choice in funds transportation to higher performing schools
Weaknesses, issues, lack of clarity	• Interventions described are general in nature and not specific to needs of subgroups • The rationale for SEA direction regarding the Title I set-aside appears disconnected from specific interventions that schools will use to close achievement gaps
Technical Assistance Suggestions	• Consider strengthening school improvement planning process to discover root causes of persistent low performance among subgroups • Consider Ohio and Colorado's unified planning process Also look for successful district practices that show how to accelerate student learning as opposed to only remediating and developmental instruction.

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:* *7 Yes, 0 No*	
Rationale	• Oklahoma provided criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status
Strengths	• To exit focus status schools must meet AMOs in all student groups
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

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

2.F   Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

2.F PANEL RESPONSE *Tally of Peer Responses:* *2 Yes, 5 No*	
Rationale	• Proposed signaling system and description of SEA oversight is strong, but connection to targeted interventions and supports is not well-developed
Strengths	• "C" schools require interventions and "B" schools require LEA-identified interventions • All schools in bottom 25% of State in student achievement not identified as priority or focus schools require interventions • Recognition for reward schools provides examples and incentives for other schools to reach that recognition • Explicit intent to work with nontraditional schools to work with the State to select the most appropriate tool and activities for school improvement • Serious about ensuring funding for implementation of interventions (p. 64) • AMO structure includes continuous improvement expectations for all schools
Weaknesses, issues, lack of clarity	• Specifics of interventions are not clearly presented • No explanation presented on how specific interventions will address needs identified in school improvement process
Technical Assistance Suggestions	• Consider implementing an early warning system, such as the one in Virginia, where struggling students are identified early and provided interventions via a Response to Intervention-like structure • Consider how interventions will help schools comply with State retention law to enable being on grade level in reading by third grade and end of course high school exams

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

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

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

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

2.G.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• While Oklahoma presents a number of resources and initiatives related to improving achievement, there appears to be more emphasis on monitoring and accountability than building capacity
Strengths	• A number of SEA-capacity-building steps are shown, including strategic partnerships with PARRC, CCSSO, Chiefs for Change, and participation in State Longitudinal Data System • A variety of monitoring activities are presented on pp. 66-67 • Priority Schools Advisory Board provides ongoing conversation about determining progress towards goals and success of turnaround principle implementation
Weaknesses, issues, lack of clarity	• Most of the related strategies listed on p.p. 66-67 are focused on monitoring activities, including federal program monitoring and the role of Regional Accreditation Officers (RAOs), however, these do not appear to emphasize capacity-building support that would lead to sustained improvement among LEAs • No regional delivery approach is described that would provide sustained state support for building LEA capacity. • How schools and districts participate in these initiatives (p. 67) and subsequently use them in school improvement is not described. Few of the initiatives focus on developing LEA capacity • Significant part of the strategy is to rely on external partners, but no RFP process is provided

2.G.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Technical Assistance Suggestions	• Consider using RAOs to build LEA capacity in addition to monitoring.

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

2.G.ii PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• While Oklahoma presents a number of resources and initiatives related to improving achievement, there appears to be more emphasis on monitoring and accountability than building capacity
Strengths	• A number of SEA-capacity-building steps are shown, including strategic partnerships with PARRC, CCSSO, Chiefs for Change, and participation in State Longitudinal Data System • A variety of monitoring activities are presented on pp. 66-67 • Priority Schools Advisory Board provides ongoing conversation about determining progress towards goals and success of turnaround principle implementation
Weaknesses, issues, lack of clarity	• Most of the related strategies listed on p.p. 66-67 are focused on monitoring activities, including federal program monitoring and the role of Regional Accreditation Officers (RAOs), however, these do not appear to emphasize capacity-building support that would lead to sustained improvement among LEAs • No regional delivery approach is described that would provide sustained state support for building LEA capacity. • How schools and districts participate in these initiatives (p. 67) and subsequently use them in school improvement is not described. Few of the initiatives focus on developing LEA capacity • Significant part of the strategy is to rely on external partners, but no RFP process is provided
Technical Assistance Suggestions	

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

2.G.iii PANEL RESPONSE Tally of Peer Responses: 4 Yes, 3 No	
Rationale	• Multiple processes for ensuring support are described including substantial State authority to direct resources; concerns remain around sufficiency of resources and capacity for strategic resource allocation
Strengths	• Proposal describes active SEA management of Title I funds to direct funding towards focus and priority school intervention work
Weaknesses, issues, lack of clarity	• Appears to rely on LEA capacity to scrutinize budgets while this capacity may not universally exist in LEAs
Technical Assistance Suggestions	• Develop process for analyzing whether resources are allocated toward strategic goals and number of priority and focus schools that can be supported, not just with respect to Title I funds • See Education Resource Strategies' Web site for relevant materials

Principle 2 Overall Review

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

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• Oklahoma has proposed a strong framework, but key design decisions have not been resolved. Many interventions are described, but the relationship between identified needs and specific interventions is not well developed. While the focus on monitoring and accountability appear strong, the focus on capacity building appears weak.
Strengths	• Working towards a comprehensive, innovative accountability system that includes multiple subjects and ways of looking at achievement data, including subgroups • Substantial effort has been made related to development of A-F multi-measure framework that promises substantial transparency for the public • Initial approach for identification of reward and priority schools appears to meet Federal criteria • Willingness to take strong State action to improve priority schools • Integrates AMOs into A-F grading system via plus/minus system which strengthens coherence and subgroup accountability
Weaknesses, issues, lack of clarity	• Many key components remain at an early stage of development including specificity of measurement in the state school grading system, for example assigning specific weights to elements in the whole-school improvement criteria • Connections between school need and proposed interventions are not well articulated • Cannot evaluate graduation rate accountability because key information on weights in the index are not yet available

PRINCIPLE 2 **OVERALL REVIEW** **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Technical Assistance Suggestions	• To ensure a focus on both a) graduating all students and b) having those graduates be college- and-career ready, consider a separate A-F grade for high school graduation • There are numerous substantial models on how State, regional supports, and LEAs can work together to diagnose and support systematic school improvement to ensure that achievement gaps close.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected Option A:
If the SEA has not already developed any guidelines consistent with Principle 3:

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

3.A.i, OPTION A.i PANEL RESPONSE Tally of Peer Responses: NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ _Not applicable because the SEA selected 3.A, Option B or Option C_	

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

3.A.i, OPTION A.ii PANEL RESPONSE Tally of Peer Responses: NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ _Not applicable because the SEA selected 3.A, Option B or Option C_	

Note to Peers: Staff will review iii.

If the SEA selected Option B:

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

Note to Peers: Staff will review i and iii.

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

3.A.i, OPTION B.ii PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Rationale	• The State guidelines for teacher and principal evaluation will ensure annual evaluation of teachers and principals that will support increase of quality instruction for students.
Strengths	• Legislature and State Board of Education (SBE) have worked together to develop the Oklahoma Teacher and Leader Effectiveness evaluation system (TLE) • Each school district in the State must adopt a teacher and leader evaluation policy based on TLE • Model includes qualitative and quantitative measures • Adopted a law that requires annual evaluation of all educators on a 5 point rating system • In accordance with the law, appointed a commission to recommend guidelines and criteria to the SBE • Provides options for districts to elect to use a model other than State default if meets similar requirements and district is able to provide resources for implementation • State-level quality training for most districts can ensure comparability and fidelity of implementation

3.A.i, OPTION B.ii PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Weaknesses, issues, lack of clarity	• No growth model to date • No evidence of plan to formally evaluate pilot and early stages of implementation to inform successful, full-scale implementation
Technical Assistance Suggestions	• Ensure that selected observation instrument emphasizes instruction without an inordinate focus on classroom management • Ensure that the TLE incorporates teacher and leadership characteristics and educational practices that ensure high quality instruction for ELs and SWDs • As part of effort to adopt growth model, work to ensure appropriate roster verification for Teacher Student Data Link in order to compute accurate growth scores; contracts, communication and training required for all of these pieces to come together • Consider engaging external researcher to evaluate pilot and implementation to inform successful full-scale implementation • Consider how the measures of growth used for school accountability correspond to the measures of growth used for educator evaluations so that they provide consistent signals to educators and form a coherent accountability system.
☐ *Not applicable because the SEA selected 3.A, Option A or Option C*	

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

3.A.i OPTION B.iv PANEL RESPONSE *Tally of Peer Responses:* *7 Yes ,0 No*	
Rationale	• Legislation has been adopted and it is indicated that State Board of Education will adopt regulations by end of 2011-2012 school year
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option A or Option C*	

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

3.A.i OPTION B.v PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	• Evidence of a concerted effort to involve teachers and leaders in the development of these guidelines is presented and consistent with current statute
Strengths	• Commission provides direct educator influence on key recommendations and ongoing guidance; other meaningful efforts have been made to solicit input • Pilot process will allow for additional input
Weaknesses, issues, lack of clarity	• No systematic process for soliciting input from teachers across the State is presented
Technical Assistance Suggestions	• Ensure clear roles and decision-making responsibilities for the commission and other groups involved in development and implementation, i.e. SBE, DOE, stakeholders • Ensure voice of teachers and principals are heard in the pilot process across the State are engaged in a meaningful way, including teachers serving SWDs and ELs
☐ *Not Applicable because the SEA selected*	

3.A.i OPTION B.v PANEL RESPONSE	
Tally of Peer Responses: *5 Yes, 2 No*	
3.A, Option A or Option C	

If the SEA selected Option C:

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

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

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

Note to Peers: Staff will review ii.

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

3.A.i OPTION C.iii PANEL RESPONSE	
Tally of Peer Responses: *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

3.A.i OPTION C.iii **PANEL RESPONSE** *Tally of Peer Responses:* *NA*	
☒ *Not applicable because the SEA selected 3.A, Option A or Option B*	

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

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

a.   Will be used for continual improvement of instruction?

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

3.A.ii.a PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	• Oklahoma's teacher and principal evaluation system uses multiple measures and provides a framework for using results to improve instruction
Strengths	• Guidelines incorporate multiple measures and results that will be used to inform feedback, development, and personnel decisions • Guidelines call for comprehensive remediation plan and instructional coaching for teachers who need improvement (p. 80)
Weaknesses, issues, lack of clarity	• Plan for ensuring evaluation results are used to improve instruction is under-developed; focus on improvement is not commensurate with focus on assigning teacher ratings

3.A.ii.a PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Technical Assistance Suggestions	• Ensure that LEAs are using results of the evaluations to drive and inform targeted improvement and ongoing development of instructional practice • Ensure that IHEs and other teacher preparation programs are involved in the development and implementation of the evaluation system and reflect their own practices in their teacher preparation programs
☐ *Not applicable because the SEA selected 3.A, Option C*	

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

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

3.A.ii.b PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• By law, Oklahoma's teacher and leader evaluation system incorporates five performance levels
Strengths	• Law states that student achievement is 50% of teacher evaluation
Weaknesses, issues, lack of clarity	• Not yet determined how quantitative and qualitative scores will roll into overall effectiveness rating • Growth measures are still under discussion and not finalized
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?

    (i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c and 3.A.ii.c(i) **PANEL RESPONSE** *Tally of Peer Responses:* *1 Yes, 6 No*	
Rationale	• Insufficient plan in place regarding 1) validation of measures and 2) consistent, high-quality implementation
Strengths	• Student growth is incorporated as a significant factor • State's plan incorporates balance of significant inputs and outputs (50% qualitative data, 35% student growth, 15% student achievement) • State commits to ongoing review and oversight of data
Weaknesses, issues, lack of clarity	• Not yet determined how student growth will be calculated • No plan for evaluating and validating data is described
Technical Assistance Suggestions	• Consider the development of a data system that will allow real-time and over-time analysis of data related to evaluation system • Consider the use of an external researcher to evaluate the system and fidelity of implementation • Consider working with Race to the Top States and other experts who can provide insight into how best to incorporate special populations into growth measures
☐ *Not applicable because the SEA selected 3.A, Option C*	

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

3.A.ii.c(ii) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes,7 No*	
Rationale	• Oklahoma's proposal discussed student growth measures but no model has been determined
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

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

3.A.ii.c(iii) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• Was not provided
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

d.   Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• Law requires annual evaluation of teachers and principals
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

e.   Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
   ➢   *Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*

   ➢   *Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• The law requires regular feedback on performance, but details have not been determined
Strengths	
Weaknesses, issues, lack of clarity	• Plans do not currently provide detail around process and protocols for feedback and professional development
Technical Assistance Suggestions	• High-quality training and ongoing support and monitoring will be necessary to ensure consistency of ratings
☐ *Not applicable because the SEA selected 3.A, Option C*	

f. Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	• Law calls for results to inform personnel decisions and compensation
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• Carefully consider sequencing to avoid placing too many high stakes on system until tested and confidence in data established (particularly as value-added and Non Tested Grades and Subjects growth measures are not yet established)
☐ *Not applicable because the SEA selected 3.A, Option C*	

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

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

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

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

> *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?*

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

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

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

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

3.B PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• Evidence not provided
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

Principle 3 Overall Review

Is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 3 OVERALL REVIEW **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	• There are many key provisions in place including law, commission, and plan for the next phases of piloting and implementation; however, many details are yet to be determined, particularly around growth measures.
Strengths	• Law and guidelines require annual evaluation based on multiple measure, i.e. teacher performance and a significant factor based on student achievement.
Weaknesses, issues, lack of clarity	• Many decisions and development still needed to assure integrity of student achievement and teacher performance data.
Technical Assistance Suggestions	

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Overall Request Evaluation

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

OVERALL REQUEST EVALUATION PANEL RESPONSE	
Rationale	• Oklahoma has proposed a strong framework, but key design decisions have not been resolved. • There are many key provisions in place including law, commission, and plan for the next phases of piloting and implementation; however, many details are yet to be determined, particularly around growth measures.
Strengths	• Oklahoma provided strong framework for transitioning to CCSS. • Directly links subgroup AMOs to the A-F school grading system
Weaknesses, issues, lack of clarity	• The State currently includes only 34-40% of SWD in their general assessments. A key addition to transition plan under Principle 1 is development of a comprehensive plan to transition SWD into the CCSS and PARRC assessments. • Many interventions are described, but the relationship between identified needs and specific interventions is not well developed. While the focus on monitoring and accountability appear strong, the focus on capacity building appears weak. • Oklahoma needs to further the development of the A-F grading system. • Efforts to identify and develop high quality growth measures for use in the teacher and leader evaluation system are in early stages. • A robust graduation rate accountability component is needed. • Specific interventions for subgroups and integrate subgroups into all available intervention options need to be developed.
Technical Assistance Suggestions	