

ESEA Flexibility

Peer Panel Notes



State Request: Utah

Date: March 28, 2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

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

Consultation Question 1 Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The Utah State Office of Education (USOE) employed a variety of strategies to inform and engage diverse stakeholders in the state, including teachers and their representatives. The groups that were engaged and/or informed were tailored to each principle (pp. 10-13). The Utah Education Association was involved in the initial design of the new accountability system.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE used surveys, blogs and online tools to solicit input. The process of obtaining educator input began in 2010 after the Board approved adoption of the Common Core State Standards (CCSS). Teachers have been part of the implementation process. • USOE also provided a summary of input and recommendations that resulted from the feedback request and how USOE responded.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE suggested that there may not be the same level of representation among stakeholders, i.e., superintendents and those with positions of authority in the system were overrepresented on most of the key committees. It is not clear how much teachers' voices were heard in the early adoption stages; however, it does seem that UEA played an integral role. (Appendix 18, p. 144).
<i>Technical Assistance Suggestions</i>	None.

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>	USOE involved or is involving diverse stakeholders at various points in the process of adopting CCSS, and the process of reviewing and aligning prior assessments to the new assessment program. Students have also had some opportunity to provide input. Diverse stakeholders appear to have been more involved in the lead up to adoption of the standards and less involved in the adoption of the accountability model.
<i>Strengths</i>	<ul style="list-style-type: none"> • Stakeholder groups that have been involved represent major disability advocacy groups in the state, minority coalition leaders, English Learners leadership, and tribal leaders. USOE appears to have made a sincere attempt to include all communities at some point. Prior to adoption of CCSS, USOE engaged in a multi-media outreach to the public, including: social media, a brochure, community presentations, and outreach to the Utah Council of Education Deans.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Despite the breadth of stakeholder groups, it is not evident that the groups are being engaged rather than just informed of policy changes. Further, it is not clear to what extent USOE involved some stakeholder groups such as parents/families, in some of the decision making. • Through the use of advanced technology to solicit feedback, the process may have disadvantaged participation from all of Utah's stakeholder groups – in particular culturally and linguistically diverse groups, and people who do not have access to the technology.
<i>Technical Assistance Suggestions</i>	None.

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 B

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE adopted CCSS in English Language Arts (ELA) and mathematics as the Utah Core Curricular Standards per Board action on August 6, 2010. Thus, USOE has been transitioning to these standards since 2006 when the K-16 Alliance was created. USOE conducted a gap analysis of prior ELA standards and CCSS.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE has had lead-time to involve a number of individuals in discussion and review of the previous standards. • USOE has indicated that its leadership meets “regularly” with LEA special education directors and IHE representatives from teacher preparation programs. • Discussions have occurred at the state-level about “LEA-level planning” for implementation of CCSS and assessments. • USOE established a reasonable timeline that began in 2010-11 and calls for full K-12 implementation with assessments by 2014-15. • The adoption of tiered instruction is an excellent instructional strategy. • For early literacy and math, digital textbooks represent an innovative approach. • Well-considered curriculum acceleration for advanced learners. • The description of curriculum acceleration for more advanced students is also thorough. • Outreach included social media.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The implementation schedule lacks clarity in how the standards will affect the planned accountability timeline. • It is not clear that USOE has aligned its diploma requirements to college- and career-ready standards.
<i>Technical Assistance Suggestions</i>	None.

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>
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<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE has taken significant steps toward addressing the needs of specific subgroups in accessing the CCSS. The SEA has conducted cross-walk in at least one standard area and has done professional development on that. The one area needing further development, is how students with disabilities will be accommodated in these standards.
<i>Strengths</i>	<ul style="list-style-type: none"> • There appears to be involvement of stakeholders and practitioners in the English Learners community. • The Master Plan for English Learners is being updated to supports implementation of CCSS. • USOE has adopted proficiency standards for English Learners and aligned them to CCSS. • The professional development included presentation on the cross-walks and demonstrated sample lessons on how linguistic issues can be taught (p. 22).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE did not detail how it will provide statewide systematic professional development and curricular materials. In particular, there is insufficient attention to building accommodations or supports into CCSS to ensure learning of students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • USOE should consider how to ensure that all students will access CCSS. • USOE should further develop professional learning to include sample units. • USOE should support curricular efforts that incorporate principles of Universal Design for Learning. • USOE should consider including workshops for all teachers focused on addressing the needs of students with disabilities, English Learners, and other unique subgroups.

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>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

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>	USOE’s plan for transitioning to the CCSS is reasonable and addresses most aspects of the flexibility request.
<i>Strengths</i>	<ul style="list-style-type: none"> Overall, USOE has made substantial progress in transitioning to the CCSS. The Board has adopted the CCSS and USOE has conducted an alignment study with the previous standards and identified areas of needed emphasis in ELA.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> There is insufficient detail regarding implementation of the CCSS for students with disabilities. USOE, as of the submission of the flexibility request, has not conducted a cross-walk to determine alignment between its math standards and the CCSS.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • USOE should consider developing specific guidance as well as a variety of supports to be provided to all teachers that addresses the learning needs of persistently low achievers, English Learners and students with disabilities. USOE should consider having content English Learner and special education teachers together develop model units, lessons, and modules based on the CCSS.

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

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

2.A.i Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? (*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>	USOE's proposed plan combines its state accountability plan with the federal accountability system to create a single accountability system for schools and LEAs. The plan has a major weakness in how it proposes to address subgroup achievement. The creation of one subgroup consisting of all non-proficient students appears to be compensatory, which will mask performance and instructional needs of certain subgroups and in certain subject areas.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE's proposed plan includes the major components of the flexibility requirements including using student achievement, growth, graduation rates, and looking at lowest performing students to identify schools for interventions. • USOE will address the challenge of having large numbers of small LEAs and schools by creating a subgroup that contains all non-proficient students on the state assessment in a school. This should result in more schools and more students being included in the accountability system.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE did not include specific identification of subgroup gaps in achievement and graduation in the accountability ratings. Performance for these subgroups will be included in reports, subject to the confidentiality provisions, but neither the annual reports nor individual student-level reports provided to school sufficiently address the need to examine and provide some form of accountability for specific subgroup performance. • The Student Growth Percentile (SGP) is determined by comparing each student’s progress with that of other students in the state with the same prior achievement pattern. This appears to be normative. • The method of obtaining final school ratings are compensatory and as a result they appear to mask low achievement in particular subject areas.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • USOE should consider developing mechanisms to flag specific subgroup gaps that exist and are unidentified by the proposed accountability system. Additionally, USOE should consider using those flags as an additional accountability measure beyond just public reporting.

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

2.A.i.a Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	USOE’s flexibility request includes components required under ESEA flexibility, but the peers did not feel that the accountability plan sufficiently addresses the needs of all subgroups. The school rating combines achievement of all subject matter areas, which would make it compensatory. Finally, a readiness measure is used which includes all HS completers not just those graduating with a regular HS diploma.

<i>Response Component</i>	<i>Peer Panel Response</i>
Strengths	<ul style="list-style-type: none"> • USOE’s proposed Comprehensive Assessment System includes differentiated recognition, accountability, and support for all LEAs based on 1) student achievement in ELA, mathematics, writing, and science; 2) graduation rates; 3) school performance and progress over time; and 4) identification of students below proficient for growth points that would count in both the All student group and the Below Proficient student group. (p. 38) • USOE will report, but not include in accountability measures, the achievement and graduation data for subgroups. • USOE presented data that the use of the Non-Proficient Subgroup would include 79 percent of the subgroups in Utah; whereas disaggregating the performance by traditional subgroups, which are subject to the minimum n-size of 30 would include only 47 percent of the student subgroups. (p. 41). • Low achieving students receive extra weight in the accountability system because they are included twice: in the all student and the below-proficient groups. • The data system is comprehensive and supports the use of the data at the classroom level to inform instruction (p. 41 and Attachment 15).
Weaknesses, issues, lack of clarity	<ul style="list-style-type: none"> • USOE did not propose using individual subgroups in the accountability model and instead uses a subgroup that includes all students below proficient (combined subgroup model). This may mask persistent low achievement within a subgroup and may reduce efforts to focus on specific programs or interventions for the subgroup. Identification of subgroup gaps will be reported and included in the AMOs, and those schools that do not meet AMOs for two consecutive years and have the largest achievement gaps will be new focus schools to take the place of focus schools that have successfully exited. As indicated in the phone call with the peers on March 28, 2012, USOE will not identify more than 10 percent of Title I schools as focus schools, even if more schools fail to meet AMOs for two consecutive years. This process may identify only a small portion of the schools that show large gaps in achievement by certain subgroups. • The graduation rate calculation for the achievement component in high schools includes “completers” (p. 39) and, as an unintended consequence, may create incentives to place low achieving students in a non-standard diploma. In addition, USOE is not calculating the subgroup graduation rate. • The compensatory nature of the model may mask low-achievement in certain subjects. The peers have continued concerns that the model will leave out important information on specific subject matter areas.

<i>Response Component</i>	<i>Peer Panel Response</i>
Technical Assistance Suggestions	<ul style="list-style-type: none"> • USOE should consider examining its data to ensure that subgroup performance is not masked by the system of compensatory growth. • USOE should consider providing a differentiated point structure that awards more points for percentage of receipt of a regular diploma and fewer points for other categories of completers. This gives an incentive to address all students, but weights college- and career-ready graduation as the most important.

- 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>	It is not clear if the model will close achievement gaps among specific subgroups because it is not likely to pinpoint where interventions are needed given the method for calculating the SGP.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE’s model may create an incentive to focus on non-proficient students as they are counted twice in the growth calculation. (p. 44). • USOE provided data that the proposed Non-Proficient Subgroup would include 79 percent of the student subgroup population in Utah whereas the tradition subgroups, counted with greater than 30 students would include only 47 percent of the student subgroup population. (p. 41) • USOE includes the alternate assessment in the accountability model, which would address the needs of some students with disabilities. (Attachment 19, p. 153) • USOE’s proposed reporting system allows schools to drill down and examine subgroup and non-proficient student data to identify instructional needs (Attachment 16).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE’s accountability system as described combines subgroups and as a result eliminates incentives to close subgroup achievement gaps. • The proposed model may mask performance of certain subgroups; however, USOE did not provide sufficient information, such as data regarding the SGP, to make a determination. • The compensatory nature of the model may mask low achievement in certain subject areas. • USOE’s public reporting model does not necessarily hold schools accountable for the performance of individual subgroups. (Attachment 16).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • USOE should identify a systematic method for reviewing trends in subgroup performance to identify subgroup gaps, and should provide programmatic changes and professional development targeted to those specific subgroups.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE weights the assessments in science and writing in addition to mathematics and ELA, and combines these in the school accountability rating. The inclusion of these subjects may help students achieve college- and career-ready standards in broader subject areas.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE includes in its accountability system science assessments and the Direct Writing Assessment (DWA) in addition to ELA and mathematics assessments. • Science, ELA and mathematics assessments are weighted equally (p. 150). DWA, which is administered at two grades, is given approximately one half of the weight of the other assessments. • Science will be used in both the growth and achievement calculations. DWA will be used in the achievement calculation. (p. 43) Both of these subject areas enhance the accountability for ensuring all students achieve the USOE’s college- and career-ready standards.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Because the accountability model combines performance on subject matter assessments, it is compensatory and may mask low achievement in certain subject areas.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should consider awarding points for achievement by subject area or otherwise systematically address accountability for performance and progress in the subject matter content.

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>	USOE provided AMOs and its method for calculating AMOs, but the method is not educationally sound. Additionally, USOE did not set specific AMOs for reading and mathematics and individual subgroups that will permit these subgroups to achieve greater rates of annual progress.
<i>Strengths</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • AMOs are not established in ELA and mathematics or by subgroups, but are instead established using the composite score which is compensatory. (p. 45) • The composite score includes the readiness indicator; the peers do not believe this is rigorous or ambitious due to the addition for completers. • Use of a single composite score will not provide information about the achievement of subgroups and subject area achievement in order to provide interventions for these groups. • It is not clear that these AMOs are similarly ambitious to the AMOs that would result from using Option A or B. • • Given lack of evidence, the peers were concerned that the AMO targets combined with the SGP will layer one normative measure on top of another without evidence of measuring growth to standard.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • USOE should establish AMOs separately for ELA and mathematics and for subgroups.

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

Tally of Peer Responses:

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE defined a method for identifying highest-performing and high-progress reward schools that considers both achievement and growth. However, the criteria for this designation are too low, which may undermine the purpose of being a reward school.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE is planning to use both growth and achievement in consideration of both high-performance and high-progress schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Using the targets and the method for selecting reward schools established by USOE results in 23 percent of Title I schools identified as reward schools. (Table 2, p. 119). The peers feel this could potentially dilute the impact of being designated as a reward school on improving school performance.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	None.

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>	USOE’s recognition and rewards proposed for its highest-performing and high-progress schools may be considered meaningful by the schools. However, some peers have a concern that without a financial incentives and increased leadership opportunities in the state the rewards will not be an incentive.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE will annually recognize reward schools through numerous strategies, such as press releases, and provide recognition to LEAs and schools. • Additionally, USOE will continue to identify the state’s highest-performing Title I school and the highest-progress Title I school for recognition at the annual National Title I Conference. USOE will provide a Title I grant award to the two national recognition schools to support a team from each school attending the National Title I Conference to receive the recognition in person. USOE will recognize these two schools in one of its monthly board meetings. (p. 47) • USOE solicited input from LEAs on the flexibility request, which included the criteria for reward schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The monetary reward is limited to two schools and as a result is not likely to be much of an incentive. • There is no system that allows the highest-performing and highest-progress reward schools to share best practices or lessons learned with schools that are struggling. This is especially important around low-achieving subgroups.
<i>Technical Assistance Suggestions</i>	None.

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>	USOE will use the Transformation Model, as approved by the U.S Department of Education for SIG schools, with the priority schools.
<i>Strengths</i>	The LEAs for all fifteen of USOE’s priority schools selected the Transformational Model, defined by Title I SIG, which includes use of the turnaround principles. (p.49)
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

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>	USOE has an approved SIG model and this will be the core intervention for priority schools.
<i>Strengths</i>	Utah’s use of the Transformation Model in priority schools is likely to increase the quality of instruction in these schools.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

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>	USOE’s priority schools are the SIG schools and are already in the process of intervention.
<i>Strengths</i>	USOE’s schools to be identified for priority status have already begun the process of interventions through the Transformation Model. (p. 49)
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

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: 2 Yes, 4 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • USOE’s requirement that priority schools have a rating that moves them out of the lowest 5 percent may not necessarily mean significant progress has been made.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Once a school exits priority status, the school will be required to participate in the Title I focus school interventions unless the average of SGP is above 320 (p. 49). • Priority schools that achieve a total score of at least 275 for at least two years and are no longer identified as priority schools will continue to be eligible for Title I SIG funds as approved in the LEA Title I SIG Application even though they are no longer identified as priority schools. (p. 49)
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Some peers were unable to determine if a score of 275 represents significant progress.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The peers recommend that the SEA demonstrate through an analysis of data that the exit criteria represent educationally significant progress.

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?

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

2.E.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE did not address the gaps in subgroups and graduation rates in high schools in identification of focus schools.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE described its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools. (p. 49). For school year 2011-12, USOE has 276 Title I schools. Ten percent of that number is 28 schools to be identified as focus schools. • USOE will use the two year average composite score (achievement and growth) from Utah Comprehensive Accountability System to rank order Utah’s Title I schools. USOE will identify as focus schools the lowest-performing 28 schools (excluding those Title I schools already identified as priority schools) based on the composite score. • Utah provided data to show that identification of focus schools using the combined subgroup of non-proficient students would include more schools than the use of individual subgroup gaps with schools where subgroups have less than 30 students.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • The focus schools identified by USOE are not necessarily the schools with the largest subgroup achievement gaps because the AMOs are a composite score that doesn’t differentiate subgroups and subject matter areas.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • See technical assistance from 2.B

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>	The timeline for identifying focus schools and beginning interventions is provided and the school improvement process is based on USOE's current Title I school improvement process. Though USOE noted that focus schools would be required to have school improvement plans, and USOE would monitor these plans, USOE did not describe specifics of interventions. Moreover, USOE provided no assurance that instructional interventions will be implemented prior to the end of the first semester.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE noted that it will identify focus schools by August 2012 based on results from 2011-12. (p. 51) • Using the existing Title I school improvement process builds on an established foundation and provides continuity throughout the state. • Within the first 90 days of the school year, each focus school will establish its school leadership team, contract with the School Support Team, conduct an appraisal, revise its school improvement plan, present the school improvement plan to the school board, and submit its LEA-approved school improvement plan to USOE. (p. 51) • USOE provides intensive professional development, such as the leadership institute, to school teams that include LEA staff, principals, coaches, and teachers. USOE provides ongoing technical assistance to LEAs and focus schools. USOE monitors implementation of school improvement plans and annual achievement results of each Title I focus school. (p. 51)
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE did not describe specific interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, subgroups, targeted at the lowest-achieving students) • USOE does not provide assurance that interventions impacting classroom instruction will begin no later than the end of the first semester of 2012-13. • USOE did not provide information on whether the interventions will be based on the needs of students or whether the interventions will be likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • The SEA should have some process in place to ensure that interventions that directly impact classroom instruction are in place not later than the end of the first semester of 2012-13.

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>	Though USOE provided the final score that will allow focus schools to exit that status, there was no discussion of how that score shows significant progress for the school or the subgroups.
<i>Strengths</i>	Focus schools that achieve a total score of 320 or higher for at least two years, exit focus school status and will be eligible for a one-year Title I Sustaining Improvement grant in the amount of \$50,000.
<i>Weaknesses, issues, lack of clarity</i>	The peers remain concerned a score of 320 does not identify the specific subgroups that need to make progress for the school to appropriately exit focus status. Using a single score for the composite subgroup does not necessarily indicate individual subgroups have made progress.
<i>Technical Assistance Suggestions</i>	USOE needs to develop a process and criteria for determining individual subgroup progress that will enable a school to exit focus status and inform instruction.

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE did not describe interventions/supports that would be provided to other Title I schools.
<i>Strengths</i>	None.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE did not describe interventions and supports provided to other Title I schools, except for those that do not meet AMOs for two consecutive years. • USOE will strongly encourage LEAs to work with schools that have not achieved AMOs for two consecutive years to implement the Title I school improvement system of support, including contracting with an SST and participating in a comprehensive school appraisal. However, the peers believe that this is not sufficient, as support is not guaranteed. • It is not clear how USOE will identify the other Title I schools that do not meet AMOs and have the largest achievement gaps because the SEA does not describe its method for calculating these AMOs. • Posting the Report Card is not sufficient to address the needs of other Title I schools. • Title I schools not identified among Utah’s original priority and focus schools that do not meet AMOs for two consecutive years and have the largest achievement gaps will be identified as a new focus schools and required to implement all focus school procedures. (p. 49-50). However, with a cap at 10 percent, not all schools with subgroup gaps will be a part of this process.
<i>Technical Assistance Suggestions</i>	None.

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

2.F.ii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE did not describe the incentives and supports in sufficient detail to determine whether they are likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities.
<i>Strengths</i>	None.
<i>Weaknesses, issues, lack of clarity</i>	Utah did not describe incentives and supports specifically to address how they would improve student achievement close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	None.

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: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE did not describe in sufficient detail its process for holding LEAs accountable for improving school and student performance, particularly for turning around priority schools. Therefore the peers do not know whether the supports will improve LEA capacity to support school improvement.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • The web-based Utah Tracker System (p. 53) provides a good mechanism for reviewing electronic school improvement plans and progress reports. • USOE provides professional development that includes: the Title I Leadership Institute for Title I principals that addresses key leadership skills; the Title I Coaching Institute for instructional coaches in Title I schools that strengthens the coaches' abilities and skills to enhance the quality of instructional delivery in the school; and annual training in the school support team (SST) process. (p. 54). • USOE's Title I section has historically partnered with colleagues in Special Education and Title III to ensure that quality professional development opportunities are available to address the instructional needs of teachers who serve students with disabilities, English language learners, and economically disadvantaged students. (p. 54)
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • There was no specificity in the interventions/supports for schools that would assure increased achievement. • USOE did not identify any resources and supports to ensure the LEAs develop high quality school improvement plans and implement those plans. • USOE did not describe its process for the rigorous review and approval of any external providers used by USOE and its LEAs to support the implementation of interventions in priority and focus schools. Such a review would be 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.
<i>Technical Assistance Suggestions</i>	None.

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>
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<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE's proposed plan combines its state accountability plan with the federal accountability system, which will result in a single accountability system for schools and districts. The peers do not believe that the plan sufficiently differentiates achievement for all subgroups which would not allow the SEA to hold schools accountable for the performance of these groups. USOE asserts that its reporting system will ensure that performance and progress for all subgroups will be addressed. However, the peers do not feel that the annual report cards or the individual student data reporting system will provide sufficient information to make programmatic improvements. Additionally, the accountability system is a compensatory model which may mask needs in certain subject areas. Graduation rates are less rigorous because they include all completers and they do not differentiate by subgroups.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE's structure for identifying schools provides more weight to students who are not proficient. • USOE's inclusion of science and writing in achievement enhances the implementation of college- and career ready standards.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Specific identification of subgroups gaps other than in report cards and use of AMOs to identify focus schools after two years was not considered sufficient to address the needs of these subgroups. • Specificity regarding the interventions that will be provided to low achieving schools was not described. • The accountability model is compensatory and may not identify low achievement in certain subjects.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • To meet the requirements of Principle 2 USOE must establish separate AMOs for ELA and mathematics and subgroups. • Peers recommend that USOE develop a process to review the AMOs for each school annually and over multiple years and use this data for identification of persistent low achievement of subgroups and in subject areas. In addition, USOE may review and require school improvement plans to be revised and interventions implemented to address the needs of subgroups and low-achievement in subject areas. One way to do this is to leverage the best practices in the reward schools and make those best practices available to the schools.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE is still in the process of developing guidelines, but there is evidence to suggest that the educator evaluation guidelines will be fully adopted by the end of this school year.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE provided a plan for adoption of full guidelines for its teacher and principal evaluation systems by June 2012. (p. 63-64) • USOE has a foundation for building its educator evaluation system in Board Rule R227-531, which addresses several elements that will be required in the guidelines that must be adopted. • USOE has convened eight groups that have been involved in developing the specific strategies and processes for implementing the guidelines. (p. 59)
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

- 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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE has formed numerous working groups of teachers to inform each portion of the plan for the guidelines and acknowledges the importance of the Utah Education Association in developing these systems (p. 59).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Utah has worked with the Utah Education Association to form eight committees of educators to focus on the different aspects of the new evaluation system. • Attachment 13 (p. 128) includes a timeline for stakeholder input on educator evaluation development and implementation input.
<i>Weaknesses, issues, lack of clarity</i>	None.
<i>Technical Assistance Suggestions</i>	None.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

- 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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

- (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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

- (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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

- 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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Not applicable.
<i>Strengths</i>	Not applicable.
<i>Weaknesses, issues, lack of clarity</i>	Not applicable.
<i>Technical Assistance Suggestions</i>	Not applicable.

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: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE has a clear outline of its plan to assist LEAs in developing local educator evaluation systems, but sufficient detail is not provided to accurately assess whether this system will be effective in creating and implementing meaningful LEA evaluations systems.
<i>Strengths</i>	<ul style="list-style-type: none"> • Board Rule R277-531 requires the state board of education to establish a committee to support and review LEA evaluation systems. The state board of education will review LEA evaluation systems for alignment with PEER, including recommending state board of education approval or needed changes for alignment. (p. 62) • Board Rule R277-531 requires the state board of education and the State Evaluation Advisory Task Force to provide professional development and technical support to LEAs as the LEAs make valid and reliable evaluation decisions. • USOE provides a timeline for LEAs to develop, pilot, and implement local educator evaluation systems within the required timeframe that, although ambitious, seems feasible. • Board Rule R277-114 allows the state board of education to withhold funds and resources to LEAs who are not in compliance. • USOE plans to work with national experts to support LEAs in the development of teacher and principal evaluation systems.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE does not describe the process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in LEAs’ teacher and principal evaluation systems. • The timeline provided, although all-encompassing, does not reflect enough detail to determine if USOE has sufficient plans that include the necessary steps to effectively implement local educator evaluation systems by 2014-15. • The pilot process is not described in detail, and the state and the local plans to assess the evaluation system have not been created. As a result, it is difficult to determine if USOE and its LEAs will gain sufficient feedback from a variety of educators. • USOE’s plan for supporting LEAs and providing technical guidance does not contain enough detail for the peers to determine whether it will be effective in supporting the development of local educator evaluation systems.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Provide more details on the pilot of the system, such as the number of LEAs, the way the evaluation systems will be assessed to determine effectiveness and the process to provide input for system revisions. • For those LEAs not adopting the state model, USOE should consider creating a framework including the criteria and process for testing the validity of local evaluation systems. This will assist LEAs in better understanding the necessary components of a valid evaluation system.

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: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	USOE has a solid foundation for developing its educator evaluation system that has involved teachers and principals throughout the process.
<i>Strengths</i>	<ul style="list-style-type: none"> • USOE has committed to implementing multiple measures and at least three levels of effectiveness. The request indicates that USOE plans to continue to develop the system over time, based on the feedback of stakeholders. • USOE involved teachers and principals in the creation of the state guidelines through a series of ongoing committees. • The Board Rules, which include many of the required elements in the flexibility request, have provided both incentives and consequences for LEAs to ensure that evaluation plans are implemented with integrity. • The student growth measures will continue to be developed and analyzed under the guidance of the Utah Policy Center and the Center for Assessment (p. 60).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • USOE does not provide sufficient detail in its request to ensure implementation of effective evaluations. • USOE provides flexibility for LEA evaluation systems but does not provide detailed guidance to ensure consistency in the development and implementation of the plans.
<i>Technical Assistance Suggestions</i>	None.

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>
<i>Rationale</i>	Overall, the plan is comprehensive and addresses a majority of components of ESEA flexibility. Principle 1 and 3 are consistent with the requirements of the flexibility request, but there are some serious areas of weakness in Principle 2.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> • Principle 1 and 3 are consistent with the requirements of the flexibility request and reflect significant participation by teachers, their representatives, and diverse communities. • The SEA’s technology, as evidenced in the proposed professional development and student data tracking system, is well-developed. • The use of a subgroup that includes all non-proficient students will increase the number of schools and students who are included in the accountability system.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • Although USOE has proposed an accountability system that will include more schools and students, there are still concerns about individual subgroups. These concerns include lack of accountability for subgroup progress. • There is insufficient weighting of the graduation with a regular diploma in the accountability model. The use of a readiness score may provide an incentive to put more students in non-standard diploma track. • USOE did not provide sufficient detail for interventions and supports for other Title I schools. • USOE did not demonstrate that exit criteria for priority and focus schools are sufficiently rigorous. • USOE did not provide AMOs for ELA and mathematics or for subgroups.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • In order to meet the requirements of Principle 2 USOE must establish AMOs by ELA and mathematics and by subgroups. • Peers recommend that USOE develop a process to review the AMOs annually and over multiple years and by schools and use these for identification of low achievement in subgroups and in subject areas. For example, USOE may review and require school improvement plans to be revised and interventions to address the needs of subgroups and low-achievement in subject areas, leverage the best practices in the reward schools and make those best practices available to the schools.