ESEA Flexibility

Peer Panel Notes

State Request: Maryland

Date: 3/30/12

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

Response Component	Peer Panel Response
Rationale	• Maryland meaningfully engaged teachers and their representatives in the Flexibility Request process and identified ways their input influenced the work.
Strengths	• Representatives from the different teachers unions at the state and local level were part of the steering committee as were local teachers of the year. Attachments 1-3 and the appendices indicate that the Maryland State Department of Education (MSDE) made efforts to reach out to and educate educators and representative bodies about all elements of the RTTT, ESEA waiver applications.
Weaknesses, issues, lack of clarity	• Unclear how aggressively MSDE worked with principal associations, but there were several meetings that included principals and all superintendents were closely involved in the process.
Technical Assistance Suggestions	• None indicated.

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

Response Component	Peer Panel Response
Rationale	• MSDE has obviously had experience in disseminating information across the state and among its 24 LEAs. It built upon its RTTT network to reach out to an impressive array of organizations, including groups representing special student groups, civil rights organizations, and, uniquely, higher education institutions.
Strengths	• Lays out details of the type of feedback received by different groups and indicates ways in which this feedback was incorporated. • The SEA optimized its small geographic scope to maximize communication efforts with superintendents and other stakeholders, including some community organizations. • The SEA's Effectiveness Council included a representative of the National Psychometric Council. • High level of general transparency about the process (communications, deliberations, etc.) through the use of the state website and other forums. • There were high levels of substantive conversations regarding accommodations for students with disabilities with professional groups and associations. • There was strong involvement of institutions of higher education (IHEs) throughout the process. • The SEA developed and presented a specific communication plan, which included a substantial slate of meetings, presentations, outreach efforts, etc.
Weaknesses, issues, lack of clarity	• It was unclear whether there was adequate outreach to some community-based organizations and Indian tribes.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• MSDE should continue its outreach and collaborative efforts with IHEs as it moves through implementation of this plan, especially with respect to aligning teacher and leader preparation program requirements and curriculum with the changing needs of the profession.

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

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

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

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

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

1.B Panel Response, Part A
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The request is clearly articulated and organized, providing details of the work along with the underlying principles and values guiding decisions. The timelines are organized, and there is evidence that the foundations of much of the work ahead have been set in terms of collaborative partnerships, meetings, websites, and other resources.

Response Component	Peer Panel Response
Strengths	• MSDE conducted gap analyses between the Common Core State Standards (CCSS) and MD standards, and involved LEAs and representatives of students with disabilities, English Learners, and IHEs in the process of reviewing math and English language arts (ELA) standards (pp 33-39). • MSDE provided details about the specific number of matches between the CCSS and the MD standards in both ELA and math (very strong in ELA; slightly weaker in math) and identified MD standards needing to be revised. (Pp 35-38). • The SEA undertook the development of a new curriculum aligned with the CCSS. This was a three-step process, which involved thinking through the application of the curriculum and associated assessments for the work of all three principles. Educators, including those representing the needs of English Learners and students with disabilities, were part of this year-long process. The efforts included development of a curriculum for early childhood education (ECE), and a comprehensive science, technology, engineering, and mathematics (STEM) curriculum. The state is also addressing literacy standards in science, social studies, history, science and technical subjects (pp 48-9, 39-40). • MSDE is developing aligned curricular materials for educators, meta-tagged to CCSS and state curricular frameworks. These will be disseminated to LEAs and educators through Effectiveness Academies, online and through other professional development. Also developing resources specifically based on universal design for learning (UDL) principles to be tools for students with disabilities and English Learners (pp 46-50). • MSDE is working with IHEs to ensure that pre-service teachers are familiar with CCSS standards, and to obtain their input and collaboration on the development of summative high school assessments in ELA and math; and to give students access to credit-bearing college courses. IHEs are also ensuring that teacher preparation programs incorporate standards for English Learners (pp 44, 58). • The State Board is considering whether or not current assessments need to be changed until Partnership for Assessment of Readiness for College and Careers (PARCC) assessments are completed and rolled out. • Efforts to get ahead of new summative assessment roll-out by partnering with LEAs, teachers, and IHEs to develop formative and interim assessments for teachers to use immediately (pp 57-8).

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• Not clear the exact standards or the general type of standards around which there was a lack of alignment.
Technical Assistance Suggestions	• Consider investing in proactive efforts to educate school boards and communities, and to garner their involvement and support. • Consider use of all newly developed formative/interim assessments for use in teacher evaluations, as part of drawing a more intentional link between the work of the various principles.

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

Response Component	Peer Panel Response
Rationale	• MSDE has made strong efforts to ensure that a variety of interested and relevant stakeholders have been involved in discussions about how to transition to the CCSS, and how to proactively address the needs of all students as part of the development of new curricular and associated materials.

Response Component	Peer Panel Response
Strengths	• Transition plan template for the CCSS included how teachers of English Learners and students with disabilities are trained to support CCSS standards including rubric (Appendix 1 B: implementation plan for CCSS including milestones, significant obstacles, timelines, etc.). • MSDE is being thoughtful about ensuring that all of its resource materials and assessments are accessible for all students in order to reduce the need for accommodations at some later date. However, the SEA recognizes that accommodations may still be necessary and is preparing to meet those accommodation needs as well. • MSDE is focusing on UDL principles as it creates curricular materials and plans for professional development and training. • MSDE had academies for assistant superintendents during which LEA teams began creating their transition plans for the shift to the common core curriculum. The SEA eventually broadened the focus beyond academics and looked at developing students' skills for success and potential career goals, including for students with disabilities and low-achieving students (p. 43, Appendix 1, D3). • Content area teachers are being provided tools and training in instruction for English Learners and students with disabilities. Cross-area teams including teachers of English Learners have been involved in the selection and development of tools (p. 22). • MSDE has been working with IHEs to ensure that pre-service teachers are familiar with CCSS standards, to obtain their input and collaboration on the development of summative high school assessments in ELA and math, and to give students a chance to get into credit-bearing college courses (pp 44, 58). • Partnership for Assessment of Readiness for College and Careers (PARCC) will consider needs of English Learners and students with disabilities as assessments are developed, including necessary accommodations. • Assessing Comprehensivon and communication in English State to State ACCESS for English Learners-English Language Proficiency (ELP) standards and aligned assessments to meet needs of English Learners and allow them to equally access CCSS. MSDE is also collecting curricular materials from teachers of English Learners to disseminate around the state. The SEA is incentivizing teachers to get additional English as a Second Language (ESOL) endorsements by providing subgrants to LEAs (p. 52).

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• There is no mention about the increased availability for all students to Advanced Placement/International Baccalaureate /college-level courses, including for English Learners and students with disabilities. • It is unclear whether MSDE is addressing SEA and LEA capacity issues.
Technical Assistance Suggestions	• Continue to focus on the training of general education/content area teachers with regard to instruction of English Learners and students wit•h disabilities in general classrooms.

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

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

Principle 1 Overall Review

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

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The request is clearly articulated and organized, providing details of the work along with the underlying principles and values guiding decisions. MSDE presented organized timelines and evidence that the foundations of much of the work ahead have been set in terms of collaborative partnerships, meetings, websites, and resources.
Strengths	• Forethought with regard to English Learners/SWD/all students, Example: Test bank items are accessible to all students. (example of general accommodations for SWD/English Learners, etc.) • MSDE proposes to offer continuous opportunities for LEAs to provide assistance for parents, teachers, and other stakeholders communications plan/outreach is very strong, particularly because MSDE was thoughtful about addressing potential obstacles (p.49). • The plan is well-developed and articulated. • Considering accessibility from the beginning as MSDE is doing can help to avoid need for some accommodations on the back end (pp. 51-52).
Weaknesses, issues, lack of clarity	• There is a general need to ensure that knowledge about and capacity of educators within the system to implement the CCSS is built and sustained.
Technical Assistance Suggestions	• Be mindful of World-Class Instructional Design and Assessment (WIDA's) alignment timeline and have contingent/interim plans in mind (p. 52). • Consider investing in efforts to educate school boards about 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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• MSDE proposes a differentiated recognition, accountability, and support system and a high-quality plan to implement this system no later than the 2012–2013 school year. The plan builds on the State's long-term investment in standards and rigorous assessments and systems crafted as part of the MSDE RTTT grant and is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Response Component	Peer Panel Response
Strengths	• Maryland's flexibility request permits the MSDE to build on more than two decades of experience with school accountability using systematic enhancements benefitting from an array of technical and policy improvements that continue to evolve (p 60). • The MSDE plan outlines differentiated recognition reflecting reward, focus, and priority categories. • MSDE currently provides extensive supports through the Breakthrough Center (BC) and proposes to leverage BC to expand its support efforts. • MSDE provides clear guidance to LEAs with responsibilities related to overall school performance bands ("strands") and is realistic about resources. • MSDE balances its role with need for local ownership and it allows LEAs to expand roles as needed. • Comprehensive P-20 system including inclusion of career and technology education (CTE) stakeholders, and CTE components are included in the data system/index. • The request includes a real-time feedback system. • The request focuses on the credibility and validity of data, including the verification of rosters. • Teachers may gain access to student data through a toolkit. • There is a focus on holding accountable school leaders (p. 62, including link to P3 system). • The ability of superintendents to meet monthly to ensure top-down alignment also helps with roll out of high-quality assessment criteria.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It is not clear that MSDE plans to treat charter schools differently from traditional public schools.,given state charter statue requirements related to performance contracts. • Reflecting the Maryland State charter statute, low-performing charter schools (i.e., charter schools that would quality as priority schools) should be closed by their authorizer. • It is unclear how the SEA plans to identify potential vendors. • Monitoring of schools is left to LEAs. It is unclear if MSDE has a plan to ensure appropriate monitoring by LEAs.
Technical Assistance Suggestions	• Work with LEAs who have authorized charter schools that are identified for turnaround assistance to encourage them to close the low-performing schools in accordance with the State charter statute.

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: *6 Yes, 0 No*

Response Component	Peer Panel Response
Rationale	• MSDE proposes to use the flexibility to expand its current system of support to provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs. The differentiation of support will be based on student achievement in reading/language arts and mathematics, and science, for all students (including all subgroups of students); graduation rates for all students (and all subgroups); and school performance and progress over time, including tracking progress of all subgroups (e.g., English Learners and students with disabilities).

Response Component	Peer Panel Response
Strengths	• Maryland explicitly acknowledges the fact that some schools are, and have been, low-performing and commits to focus on the lowest-performing schools and to support those efforts vigorously, with a drive toward rigorous, but realistic goals. • Focus on students' trajectory from pre-K through the post-secondary experience. • MSDE has a plan to provide leaders with better tools to gauge how schools are addressing the needs of subgroups as well as individual students. • The data array will permit leaders to examine how well students are progressing year-to-year and probe further into data to locate the most egregious student performance gaps among subgroups. • Maryland's proposed State Performance Index (SPI) and public reporting of data infuse accountability into the system. The development of the proposed SPI reflects MSDE's commitment to creating a nuanced assessment of performance that is relatively simply to understand and reflects collaboratively identified "core values." • MSDE IDEA scorecard infuses accountability for educating students with disabilities. • MSDE followed a methodical process to establish the standards at elementary, middle, and high school in reading and mathematics reflecting emerging best practice related to measuring achievement, gap and college- and career-ready standards (p. 76-83). • Proposal to create differentiated system is comprehensive and recognizes the importance of all performance indicators. Designed growth-related features for students with disabilities and English Learners. • AMOs are well-integrated into system. • Performance of subgroups is not masked in the SPI. • Inclusion of cohort graduation rate, cohort drop-out rate, and career attainment communicates MSDE's commitment to rigorously assesses examining the performance of its high schools (p. 72).
Weaknesses, issues, lack of clarity	• None indicated.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Given the complexity of the proposed SPI, multiple tests runs of real data to examine how the SPI works will be essential to successful roll-out. In particular, ensure that, when run, the SPI has face validity. In other words, ensure that the SPI produces the anticipated strands of schools and that the strands reflect the vision underlying its development. • Develop a strategic communication plan to rollout ESEA flexibility plans to make sure that teachers, leaders, parents, and other stakeholders understand and communicate the SPI , growth model, and other components.

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: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	• MSDE's differentiated recognition, accountability, and support system includes incentives and provides support that is likely to be effective in closing achievement gaps for all subgroups of students. However, some peers were concerned that that lack of details regarding the incentives hampered their ability to assess potential impact on the achievement gap (pg. 85-93).

Response Component	*Peer Panel Response*
Strengths	• Uses school-level data to create well-thought-out tiers with corresponding accountability and supports from LEAs and SEAs and provides good framework for improvement of schools. • Each school in the State is expected to develop and maintain a school improvement plan (SIP). The details of the plans should reflect the degree of improvement required. • Multileveled system of supports and monitoring reflects a commitment to providing differentiated support based on need, as opposed to one size fits all. • In developing SIPs, schools are expected to incorporate success on more than just academic achievement outcomes (i.e., social and emotional outcomes) and incorporate relevant interventions if needed (p.87). • MSDE has proposed a system of incentives that includes more positive incentives and supports and is, thus, not limited to sanctions. • Chart on p. 91-93 has a helpful breakdown of supports by strand. • MSDE's small n-sizes (5) ensures a high level of accountability for all subgroups.

Response Component	*Peer Panel Response*
Weaknesses, issues, lack of clarity	• Logic for identifying schools into Strands is not intuitive. Added layer of categorization may be confusing to the field charged with negotiating supports associated with Strands vs. reward, focus, and priority status • Limited mention of role of LEA and specifically, efforts to examine LEA actions relative to school performance. Given that most low-performing schools are clustered in two LEAs, a more focused examination of LEA's seems warranted • MSDE's small n-sizes (5) raise questions about statistical reliability given impact of a single student and privacy concerns requiring safeguards. • Unclear extent to which SIP process or content will be different from prior practice. MSDE does not plan to outline a format for SIPs except to require priority schools to incorporate the seven turnaround principles. Given that some of the schools identified as priority have been low-performing for many years and presumably used existing SIPs, the peer reviewers are concerned about the utility of the SIPs for LEAs. On a symbolic level, asking LEAs to use the same tools in the same way communicates that expectations are the same as opposed to communicating a new sense of urgency to focus on low-performance. Moving forward, the peers question whether SIPs will be "living" documents that are central to driving the change process or compliance documents that are disconnected from day-to-day practice in the school. While pages 86-90 of the plan and page 9 of the "Response to Peer Review Questions" discuss the SIP, some peers remain unclear about how MSDE plans to support LEAs and schools to craft SIPs that become dynamic tools for change rather than solely focused on compliance.
Technical Assistance Suggestions	• Provide technical assistance regarding writing SIPs that catalyze change as opposed to simply comply with regulations. • Better graphics to explain, especially for strands, relative to other categorization (e.g., strands versus federal designations of priority, focus, reward). • Ensure teachers understand the index and categorizations in order to be prepared to communicate with parents.

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

Response Component	Peer Panel Response
Rationale	• MSDE has opted to include student achievement on science assessment in addition to reading/language arts and mathematics in its differentiated recognition and accountability system.
Strengths	• MSDE has included science and it is weighted equally with math and RLA in the SPI.
Weaknesses, issues, lack of clarity	• None indicated.
Technical Assistance Suggestions	• None indicated.

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: NA

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

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: NA

Response Component	Peer Panel Response
Rationale	• MSDE's has described it methodology for identifying highest-performing and high-progress schools as reward schools
Strengths	• MSDE has proposed a methodology consistent with flexibility requirements.
Weaknesses, issues, lack of clarity	• None indicated.

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

Response Component	Peer Panel Response
Rationale	• MSDE's proposed recognition and rewards for its highest-performing and high-progress schools are likely to be considered meaningful by the schools. However, a peer expressed concerns about the language used to describe the schools.
Strengths	• The proposed reward structure promotes elevating practice and sharing knowledge • Intrinsic nature of rewards to build up professional practice and teacher leadership opportunities.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• The school designations--e.g., "Distinguished" Highest Performing and "Superlative" Highest Progress)—could be perceived to be excessive.
Technical Assistance Suggestions	• Rather than just awards and celebrations, MSDE could build in structures to leverage success. For instance, MSDE could offer an honorarium to the principal or particularly effective teachers to give presentations to other schools that are struggling and then promote this dissemination of information. • Clarify whether MSDE may allocate resources (e.g., scholarships for students or perhaps grants for teachers) that could leverage success to benefit all schools in the state. Specifically, sharing experiences and practices across schools and teachers ,(i.e. lab school model

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

Response Component	Peer Panel Response
Rationale	• The interventions that the SEA described align with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools.
Strengths	• MSDE has created a structure, the Breakthrough Center, to support implementation of the seven turnaround principles. The BC's success to date is a good indication of future success (p. 321-326 of Appendix). • The request includes a focus on early childhood education in low-income neighborhoods (p. 104).
Weaknesses, issues, lack of clarity	• Need more details about "providing strong leadership." It is unclear how MSDE defines strong leadership and how the BC will help LEAs cultivate, hire, and support these leaders. Absent clear guidance from the SEA, "strong leaders" could simply mean experienced leaders and this does not reflect the research on effective leadership. The definition should include a linkage to Principle 3 evaluation systems. • The impact of the mandatory set-aside for priority schools is unclear. Specifically, it is unclear whether this will divert resources from schools that are close to or on cusp of qualifying for them. • The request mentions multiple plans and applications that LEAs will need to complete (e.g., focus school plan, SIP, master plan). It is unclear to what extent these documents complement one another and whether MSDE has made an effort to minimize redundant paperwork. It is also unclear whether the LEAs find these plans helpful. • It is unclear how MSDE is going to build LEA capacity to rigorously assess external service providers, particularly around whether there is a process in place or whether MSDE has established criteria.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Provide assistance to LEAs regarding how to assess providers of supplemental educational services (SES) and hold them accountable for the quality of services. • Examine organizational change tools that focus on prioritizing and tracking change efforts (e.g., 90-day plans, Balanced-Score Cards) to determine whether the structure of the existing Master Plan and SIP optimize their value in planning, executing, and monitoring school change efforts.

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

Response Component	Peer Panel Response
Rationale	• The identified interventions proposed by MSDE to be implemented in priority schools are likely to increase the quality of instruction in priority schools; improve the effectiveness of the leadership and the teaching in these schools; and improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students.
Strengths	• The focus on building LEA capacity is a strength and reflects research on effective turnarounds. Schools cannot turn around absent support for the LEA and the LEA examining its own practices to determine policies and practices that may hinder meaningful change • Creation of the Early Childhood Breakthrough Center by MSDE reflects the importance of early childhood education and the value of investing in early interventions to respond to learning issues as they emerge.

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Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• Some of the schools identified as priority schools are already a few years into a turnaround effort. More information is required to understand how future efforts will be different from those in the past and would lead to dramatic change. The application does not articulate how the new structure will catalyze a sense of urgency to improve the schools identified as "priority." • This section provide only limited information related to changes in instruction, improved leadership and teaching, and improved achievement for all students- including English Leaders, students with disabilities and the lowest achieving students. • More information required regarding how MSDE and specific LEAS are going to improve graduation rates.
Technical Assistance Suggestions	• MSDE could accelerate the effort by not only focusing on "targeted and intensive principal leadership development" through the Breakthrough Center but also the development of intentional leadership pipelines and proactive efforts to evaluate and, if necessary, replace principals that do not demonstrate the ability to lead bold change initiatives. • Reflecting the goals of Principle 2 &3, the BC should track effective and ineffective leaders and teachers and analyze their profiles to identify particularly effective and particularly ineffective training programs. • Develop plan for improving graduation rates.

    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: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	• MSDE's proposed timeline ensures that priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015.
Strengths	• The chart on pages 106-109 meets the flexibility requirements and is reasonable. The chart includes space for capacity-building and communications. • SIG plans for 16 schools already in process, only 5 schools need to implement a new intervention. • Restructuring Implementation Technical Assistance (RITA) is a strength.
Weaknesses, issues, lack of clarity	• Given that many of the schools identified to be priority and focus schools are already in the pipeline for improvement efforts, some peers were concerned about the value of granting the 5 non-SIG schools an entire year of "pre-implementation" activities. For instance, while community engagement is very valuable, the process of consulting for the flexibility request should in effect have provided an opportunity to gather community input. It is unclear whether the LEA really needs to continue to gather community input or if it would be better off devoting energy to steps that will improve instruction for students currently in the school. • The request did not provide a clear description of the relationship between the role of Breakthrough Center and RITA. It would be beneficial to understand how these two efforts are aligned.
Technical Assistance Suggestions	• Given the small number of districts, MSDE and BC should provide targeted and intense support to assist LEAs to build capacity to launch initiatives in priority schools in fall of 2012 rather than wait until 2013. • Ensure strategic and robust selection and development process of turnaround providers..

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: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	• Yes, MSDE provided criteria to determine when a school that is making significant progress in improving student achievement exits priority status. However, some peers expressed concern that the plan does not articulate a specific projected timeline. It is unclear whether priority schools are expected to exit within a certain time period and, if so, what the consequences are for schools that do not exit.
Strengths	• The requirement to move up 2 strands in overall performance rating is high bar that clearly indicates significant progress has been made by school.
Weaknesses, issues, lack of clarity	• No indication of consequences of school lingering in priority status. It is also unclear whether MSDE monitors the progress towards exit. The peers would have liked to know what triggers or milestones are involved and when they would occur . Lack of clarity regarding next steps for schools that don't improve to meet exit criteria. • It is unclear whether it is reasonable or feasible for a school to jump two strands, and what this actually represents quantitatively.
Technical Assistance Suggestions	• Develop a specific timeline for improvement and consequences of failure to made advances (e.g., replace leader, reassess faculty).

2.E   Focus Schools

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

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

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

b. Is the SEA's methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• Yes, MSDE has described its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools.
Strengths	• Proficiency for each year is calculated as the sum of reading and mathematics proficient students divided by the sum of reading and mathematics test takers. • Gap scores for each year used to create a weighted gap score for ranking, weighting the 2010 score with a weight of 1 and the 2011 score with a weight of 1.25. • Concerns about declines in the highest-performing subgroup influencing the analysis are addressed by computing a corrected gap score for the current year using the higher of the percent proficient for the current year and prior year for the highest-performing subgroup before applying the weight for the current year.
Weaknesses, issues, lack of clarity	• None indicated.
Technical Assistance Suggestions	• None indicated.

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?*

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➢ *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

Response Component	Peer Panel Response
Rationale	• MSDE's process for LEAs to identify the needs of its focus schools and their students and implement interventions in focus schools will start in 2012–2013 school year but the structure lacks adequate nuance.
Strengths	• System proposed directs funding to focus schools • Full implementation scheduled for fall 2012. • Instructional strategies, professional development, parental involvement. • Timeline explained on pages 116-117. • MDE is providing technical assistance to schools (via Breakthrough Center)—the Center will review and analyze all facets of school operation including collaboration with parents on SIPs (p.114).

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It is unclear who is going to be providing assistance to the focus schools and how MSDE or the respective LEAs will hold them accountable for performance. Given the investment in provision of technical assistance, putting such a mechanisms in place will increase the chance of the technical assistance leading to desired outcomes. Conversely, lack of a structured system to evaluate quality, the value of the assistance may be highly variable. • Peers were unclear who was coordinating the various focus school efforts (e.g. LEA vs. Breakthrough Center vs. RITA vs. SEA) to ensure that supports are coherent to school personnel. • The technical assistance identified focuses heavily on instruction and assessment of data. One peer wondered how leadership and leadership teams will catalyze change in the focus schools. • Focus on students with disabilities appears to be limited to a list of math and reading interventions. A more meaningful approach would include analysis of extent to which students are meaningfully included and have access to the general education curriculum. • No mention of special efforts to address needs of English Learners. • Insufficient detail on exact strategies for using largest subgroup of underperforming students to make intervention decisions. • More detail regarding interventions on different grade levels would have been appropriate.
Technical Assistance Suggestions	• Assist all school personnel regarding implementing universal designs for learning and inclusion of students with disabilities, English Learners, and low-performing students. • Provide LEAs with technical assistance related to effective recruitment, hiring, induction, support, and evaluation of both school leaders and teachers.

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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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• Yes, MSDE provided criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status.
Strengths	• Criteria clearly articulated for exit (e.g., progress for subgroups equal to two strands).
Weaknesses, issues, lack of clarity	• Exit criteria do not include a projected timeline that would include steps to take if schools do not make changes within a given timeframe (e.g., 18-24 months).
Technical Assistance Suggestions	• Create structure to assess leading indicators of change so MSDE and affected LEAs can take steps if meaningful change for subgroups is not occurring.

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

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

2.F.i Panel Response
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• MSDE's differentiated recognition, accountability, and support system provides 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. Existing structures developed under RTTT and MSDE's statewide system of support serve as structure of this support system that will benefit all LEAs with Title I schools that are not making progress (i.e., Breakthrough Center).
Strengths	• MSDE has developed a channel to provide funding to Title I schools ($20,000 + $30 per pupil allocation PPA) and thereafter monitor progress. • MSDE plans to rely on LEAs and use the BC to provide targeted supports to this cohort of schools • Missing AMOs for any subgroup means applying for 1003(a) funding is required of Title 1 schools, including plan • MSDE has a process to audit LEAs. • MSDE provides training in use of data and application to instructional decisions (p. 124)
Weaknesses, issues, lack of clarity	• MSDE plan lacks details regarding support related to leadership • MSDE plan mentions use of needs assessments but provide little details regarding their purpose. • MSDE plan for this cohort of schools does not mention intention to use incentives
Technical Assistance Suggestions	• Provide TA to LEAs regarding how to develop a robust partnership that includes a rigorous assessment of external provides and tangible accountability mechanisms to track the value added by the external partners to instructional goals.

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: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	• MSDE's differentiated recognition, accountability, and support system provides 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. However, the plan lacks details regarding how it will close achievement gaps and increase the quality of instruction for all students, including English Learners and students with disabilities.
Strengths	• Schools that do not meet AYP must submit improvement plan and may apply for 1003(a) funds. LEAs are charged with identifying needs and providing technical assistance to schools.
Weaknesses, issues, lack of clarity	• Heavy reliance on LEAs to provide technical assistance presumes that LEAs have internal capacity and it is unclear how MSDE plans to ensure that LEAs are equipped to play this role. • Lack of attention to students with disabilities and English Learners in instructional improvements supports. • Unclear how MSDE plans to track implementation of supports to ensure fidelity that will lead to improved instruction supporting improved outcomes for all students, including English Learners and students with disabilities.
Technical Assistance Suggestions	• Ensure that new PD regarding use of data to improve instruction is integrated into the system of support and expands beyond traditional approaches (i.e., data is not just used for high-stakes accountability but also to inform instructional decisions that lead to focused interventions).

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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: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	• The structure in place does not appear to include tangible consequences for failure to successfully implement changes that will lead to better student outcomes (e.g., examine and change instructional practices). Given high stakes involved—students stuck in low-performing schools—actual consequences are required to infuse a sense of urgency for change.

Response Component	*Peer Panel Response*
Strengths	• MSDE has a structure in place (i.e., the master plan) to monitor LEA change efforts and, if necessary, develop corrective actions plans to address areas of concern (p. 128). • MSDE has created a structure to track and work closely with two LEAs (BCPS and PGPS) that have the majority of low-performing schools. • SEA support for the development of the teacher and principal professional growth plan (PGP) creates opportunity to build teacher and leader capacity. • Turnaround Offices in all priority LEAs.
Weaknesses, issues, lack of clarity	• It is unclear whether the master plan tracks basic compliance or actual substantive change. Aside from reporting structure, unclear consequences for failure to make progress (e.g., sanctions such as withholding funds or threat of state intervention). • It is unclear how the LEA turnaround offices in all priority LEAs fit into overall improvement structure. The extent to which MSDE will be able to hold LEAs accountable for the performance of this office is also unclear. • It was unclear to peers how schools and LEAs are held accountable (pg. 130). Given that a number of the schools on the list have been low performing for many years, it is unclear what the full impact of "admonition" is. Given the high stakes involved for students, a lack of more tangible and impactful sanctions (e.g., withholding state or federal funds) may undermine this effort. • More details required to fully understand the teacher and principal professional growth plan.
Technical Assistance Suggestions	• Establish intentional pipelines for principals and teachers to equip them to work in high-priority schools by working with IHEs or alternative-certification programs. • Provide LEAs with technical assistance related to effective recruitment, hiring, induction, support, and evaluation of both school leaders and teachers.

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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: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	• MSDE's proposes to use the ESEA flexibility to expand its current system of support to provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs. The differentiation of support will be based on student achievement in reading/language arts, mathematics, and science, for all students and all subgroups of students; graduation rates for all students and all subgroups; and school performance and progress over time, including tracking progress of all subgroups (e.g., English Learners and students with disabilities).

Response Component	Peer Panel Response
Strengths	- MSDE's flexibility request builds on more than two decades of experience with school accountability using systematic enhancements benefitting from an array of technical and policy improvements that continue to evolve. (p 60) - Components of the SEA's plan have the potential to fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the MSDE , its LEAs, its schools, and its students. - MSDE plan to leverage ESEA flexibility to build on its RTTT grant. - The identified interventions proposed by MSDE to be implemented in priority schools are likely to increase the quality of instruction in priority schools; improve the effectiveness of the leadership and the teaching in these schools; and improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students. - MSDE currently provides extensive supports through the Breakthrough Center (BC) and proposes to leverage the Center to expand its support efforts. - MSDE strives to balance its role with need for local ownership; it allows LEA's to expand roles as needed. - Comprehensive P-20 system including inclusion of career and technology stakeholders. - Ability of superintendents to meet monthly to ensure top-down alignment also helps with roll-out of high-quality assessment criteria.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• Logic for identifying schools into strands is not intuitive. Added layer of categorization may be confusing to the field charged with negotiating supports associated with strands vs. reward, focus, and priority status. • MSDE's small n-sizes (5) raise questions about statistical reliability given potential impact of a single student on analyses and privacy concerns. • Unclear extent to which the MSDE SIP process or content will be different from prior strategies. MSDE does not plan to outline a format for SIPs except to require priority schools to incorporate 7 turnaround principles. Given that some of the schools identified as priority have been low performing for many years and presumably used existing SIP, it is unclear how development of a new SIP will lead to different outcomes. On a symbolic level, asking LEAs to use the same tools in the same way communicates that expectations are the same as opposed to communicating a new sense of urgency to focus on low-performance. It is unclear whether the SIPs will be "living" documents that are central to driving the change process or compliance documents that are disconnected from day-to-day practice in the school. • It is unclear whether the master plan tracks basic compliance or actual substantive change. Aside from reporting structure, unclear consequences for failure to make progress (e.g., sanctions such as withholding funds or threat of state intervention). • Differentiated support structures lack adequate focus on the importance of leadership in driving and sustaining change and clear consequences for not implementing change. • Avoid overwhelming LEAs with compliance and paperwork (e.g., focus school application, SIP, and master plan) that may not actually help LEAs to plan, implement, and track targeted improvement efforts. • LEAs to granted autonomy without appropriate accountability and supports from MSDE. • Lack of details regarding instructional practices for English Learners and students with disabilities.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Provide guidance regarding how to empower school leaders to influence staff and build buy-in for reforms that will require personnel to change their practices (e.g., integrate data into decision-making, examine instructional practices, shift allocation of resources to support goals, discontinue practices that don't support goals) • Build state and district capacity to provide focused and high quality professional development to all personnel regarding meaningful inclusion of students with disabilities, English Learners and low-performing students so that all school personnel see their success as their responsibility as opposed to the responsibility of specialists. • Build LEA capacity to recruit, monitor, and evaluate external service providers that may be engaged to provide services to schools identified for differentiated support.

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

Response Component	Peer Panel Response
Rationale	• Maryland is in the process of providing recommendations to the State Board to be promulgated in March 2012. These recommendations will be a compilation of the work completed within the Race to the Top application as well as the Education Reform Act of 2010. Lessons learned from the pilot implementation sites will also be integrated into the suggested regulations to the board.

Response Component	*Peer Panel Response*
Strengths	• Maryland has a demonstrated a plan to move toward statewide adoption and implementation. • Maryland recognized that SEA and LEAs were not sufficiently ready to fully implement the teacher and principal evaluation system. Therefore, MSDE submitted an amendment to the Department, which it granted, providing an extension of 1 year before full implementation. • Piloting across 7 LEAs.
Weaknesses, issues, lack of clarity	• The goals of Maryland's State Teacher Evaluation Model and methods of evaluation to ascertain overall effectiveness of the model has not been clearly articulated.
Technical Assistance Suggestions	• MSDE should consider providing a clear description of the teacher and principal evaluation goals and how progress and the supporting data and benchmarks will be established across 1, 3, and 5 years of implementation. • Continue to focus on training related to the use and implementation of SLOs to ensure that teachers have the capacity to write rigorous goals that are aligned to the common core standards, to select and implement valid and reliable measures to determine student growth, and assess data to determine if the learning trajectory represents a year's worth of growth. • Develop a method to monitor SLO rigor and effectiveness in ensuring the growth of all students.

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

Response Component	*Peer Panel Response*
Rationale	• A large portion of MSDE's response to Principle 3 was generated from the SEA work in preparation for the Race to the Top Competition. The SEA has relied extensively on consultations, feedback, and focus-group discussions with teachers and principals throughout the State to provide direction for this work.

Response Component	Peer Panel Response
Strengths	• MSDE held a series of 24 focus groups consisting of 432 stakeholders to provide input into the draft teacher evaluation framework. • Eleven focus groups engaged 200 principals and 30 supervisors of principals on the draft framework for principal evaluations. • Input from the 7 pilot LEAs helped steer framework development. • MSDE established a Maryland Educator Effectiveness Council (MEEC) which includes membership from multiple stakeholder groups. A noteworthy member includes a representative from the National Psychometric Council.
Weaknesses, issues, lack of clarity	• None indicated.
Technical Assistance Suggestions	• Develop a more strategic method to garner feedback and collect data on pilot outcomes. • Develop a strategic communication plan so that stakeholders are kept informed of the process of development, implementation, and results.

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

Response Component	Peer Panel Response
Rationale	NA
Strengths	NA
Weaknesses, issues, lack of clarity	NA

Response Component	Peer Panel Response
Technical Assistance Suggestions	NA

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

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

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

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

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

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

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

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

(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?

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

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

Tally of Peer Responses: NA

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

(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

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

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

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

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

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

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

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

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: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	• MSDE is building off of existing regulations and lessons from the seven pilots that provide a rich opportunity to determine the needed structures and systems for successful implementation at the local level and to integrate those into proposed regulations to the board.
Strengths	The MEEC indicated that the proposed regulations will likely reflect the following: • MSDE will review current LEA evaluation tools, protocols, and processes to determine potential applicability to other counties and applicability for the statewide model (p.138). • Highly effective and effective ratings only provided when adequate growth is demonstrated. • Teachers identified as ineffective will be provided the necessary supports to improve their practice. • Model rubrics for teachers and leaders will be offered. • Guidance to LEAs in how individual components will be combined for overall summative ratings.
Weaknesses, issues, lack of clarity	• Not clear if MSDE has developed a strategic and structured process to identify barriers and promising practices from the pilot sites to help inform proposed regulations. • The supporting documentation did not indicate how the effectiveness of the evaluation system will be determined. • The peers feel that MSDE missed an opportunity to validate measures by conducting research alongside pilot implementation.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Develop strategic plan to evaluate pilots. • Provide a clear description of the teacher and principal evaluation goals and how progress and the supporting data and benchmarks will be established across 1, 3, and 5 years of implementation would create a clear plan for the determining effectiveness. • Establishing a means to evaluate outcomes related to improved teacher and administrator capacity as a result of professional learning would likely validate and strengthen professional development efforts. • Continue to seek out assistance from national experts and other states to ensure fidelity of implementation of the SLO process. • Engage school boards in order to build buy-in, given their role in working with superintendents to make personnel decisions.

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 is 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: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	• Maryland regulations and pilot examples provide a foundation for the development of proposed regulations to be presented to the board.

Response Component	*Peer Panel Response*
Strengths	• Alignment between principal 1, 2, and 3 was noted throughout the application. • MSDE will review current LEA evaluation tools, protocols, and processes to determine potential applicability to other counties and applicability for the statewide model. (p.138). • MSDE will gather input from pilot sites to help inform the recommendations to the board. • Stakeholder feedback through representation on the Council and other methods strengthened buy in. • The existing rubric and its implementation provide a solid foundation to assess professional practice. • Recognition of the training requirements in SLO implementation.
Weaknesses, issues, lack of clarity	• Student growth is designated as a specific component however questions about the methodology in obtaining and attributing student growth remain. • The supporting documentation did not indicate how the effectiveness of the evaluation system will be determined. • The peers feel that MSDE missed an opportunity to validate measures by conducting research alongside pilot implementation.
Technical Assistance Suggestions	• Provide a clear description of the evaluation system goals and how progress and the supporting data and benchmarks will be established across 1, 3, and 5 years of implementation. • Establish a process to conduct research alongside pilot implementation so that measures can be validated prior to state-wide implementation • Develop a strategic communication plan detailing steps to inform the broader school community of district implementation efforts, progress, results, and future plans for implementation.

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

Response Component	Peer Panel Response
Rationale	• Maryland State Department of Education has established a vision for each student graduating college- and career-ready, with the freedom to choose his or her life's course and lays out a well-articulated, thoughtful and cohesive plan for the translation of this vision into reality. MSDE must be commended for submitting a request that thoughtfully aligns the components of Principles 1, 2 and 3, (e.g. proactively addressing issues such as the quality of standards implementation, including the development of high-quality curricular materials and corresponding assessments that are accessible to all students and can be used to measure growth for the purposes of educator evaluations). MSDE has also focused on the development of curriculum grounded in UDL to ensure college- and career-readiness for all students. Such attention to alignment, accessibility, and cohesion reflects the time and effort MSDE and key stakeholders have spent considering the ways in which the components of a system of educational accountability and support must intersect in order to drive meaningful long-term outcomes for all students and educators. • MSDE's flexibility request builds on more than two decades of experience with school accountability using systematic enhancements that reflect an array of ongoing technical and policy improvements. The overall system of differentiated recognition, accountability, and intervention will identify and support schools, administrators, and educators in a manner that builds their capacity to improve outcomes for students, close the achievement gap, and improve equality of education for all students. Given the level of responsibility being provided to LEAs to implement change processes, peers were concerned that MSDE did not articulate clear strategies for monitoring LEA activities, and indicate potential sanctions for LEAs failing to improve the performance of their underperforming schools. • Political and technical challenges exist around the issues of fairly and comprehensively measuring schools' and educators' impact on student academic achievement and growth, especially in light of the proposed consequences attached to such determinations. Maryland has been thoughtful in its efforts to address many of these emerging challenges, and has proposed processes to ensure its ongoing integration of new knowledge. MSDE will need to continue to monitor the quality of its implementation, capacity-building efforts, and support structures in order to successfully foster systemic and long-lasting changes. • The peers felt that MSDE has reflected on the complexities and challenges of its proposed plans and has identified structures and processes that will facilitate implementation over the next several years, especially with respect to developing the capacity of district- and school-level actors to drive deep-rooted and systemic changes to instruction and pedagogy. The state would do well to develop a plan to continually monitor the progress of the various strands of work, as well a strategic plan to communicate ongoing efforts and changes, in order to increase the level of buy-in and support for continually improving the effectiveness of its systems.

Response Component	Peer Panel Response
Strengths	- MSDE undertook a three-step process to develop a new curriculum aligned with the CCSS, which involved thinking through the application of the curriculum and associated assessments for the work of all three principles. Educators and stakeholders including those representing the needs of English Learners and students with disabilities were part of this year-long process. The efforts included development of a curriculum for ECE, and a comprehensive STEM curriculum. The state is also addressing literacy standards in science, social studies, history, science, and technical subjects. - MSDE is developing aligned curricular materials for educators, meta-tagged to CCSS and state curriculum frameworks. These will be disseminated to LEAs and educators through Effectiveness Academies, online and through professional development. MSDE is also developing resources specifically based on UDL principles to be tools for all teachers working with students with disabilities and English Learners. - The SEA has created an Early Childhood Breakthrough Center which reflects the importance of early childhood education and the value of investing in early interventions to respond to learning issues as the emerge. - MSDE is working with IHEs to ensure that pre-service teachers and leaders are familiar with CCSS standards. - MSDE is collaborating with IHEs to obtain input on the development of summative high school assessments in ELA and math; and to give students access to credit-bearing college courses. - The SEA has drafted a comprehensive approach to creating a differentiated system of State accountability and supports that will leverage a nuanced assessment of student performance and growth to allocate Federal and State resources to support a continuum of intense to moderate supports to low-performing schools. - There will be a public reporting of school- and district-level data to infuse accountability into the system. Development of the SPI reflects commitment to creating a nuanced assessment of performance that is relatively simply to understand and reflects collaboratively identified "core values." - All schools are expected to develop and maintain school improvement plans. The details of the plans should reflect the degree of improvement required - The SEA plans to ensure that new professional development regarding use of data to improve instruction is integrated into the system of support and expands beyond traditional approaches (i.e., data is not just used for high stakes accountability but also to inform instructional decisions that lead to focused interventions). - Components of MSDE's request fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the MSDE, its LEAs, its schools, and its students. - Maryland regulations propose teacher and principal evaluation frameworks that are currently being piloted and provide a foundation for the development of proposed regulations to be presented to the board.

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Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• Not enough details about the SEA's plan to evaluate professional development and other proposed supports to determine effectiveness. • Unclear how MSDE will hold various support personnel (e.g., coaches) accountable for performance. Given their prominence in the model, developing robust systems to recruit, select, induct, support and evaluate would increase positive impact of these reform actors. • Student growth is designated as a specific component in educator evaluations; however questions about the methodology proposed to obtain and attribute student growth remain. • Structures proposed for identifying and supporting low-performing schools do not consistently include tangible consequences for failure to successfully implement changes that will lead to better student outcomes (e.g., examine and change instructional practices). Given high stakes involved, MSDE should articulate actual consequences at all levels. • It is unclear whether the master plan tracks basic compliance or actual substantive change. Aside from reporting structure, unclear consequences for failure to make progress (e.g., sanctions such as withholding funds or threat of state intervention).

Response Component	Peer Panel Response
Technical Assistance Suggestions	• MSDE's timeline to implement the system reflects the urgency to address low-performance but this must be balanced with the need to set realistic goals to achieve systemic change. • Continue to implement its strategic communication plan to ensure that stakeholders, including parents and school boards are informed of the changes made as a result of this flexibility request. • Continue to ensure that the strategies and initiatives within Principle 1, 2 and 3 align and work collaboratively and strategically toward the same vision. Academic growth for students is more likely to be achieved if all 3 Principles work cohesively so that all students exit school college- and career-ready. Ensuring that newly designed assessments are valid for measuring student growth for the purposes of evaluation, or that the competencies that teachers need to address the needs of students with disabilities and English Learners are included within the teacher evaluation framework, can only serve to strengthen the educational framework that MSDE is proposing. • Ensure alignment of training and roll-out across Principles. • Develop capacity of LEAs to select and implement instructional and professional development strategies with the most impact with a depth of rigor needed to drive system change. • Provide technical assistance to LEAs to fully implement a process to evaluate the quality, depth, and effectiveness of professional development and ensure the fidelity of implementation. • Ensure alignment between the professional teaching and administrator standards, and the overall accountability systems to ensure that incentive and support systems for teachers and administrators align. • Provide a clear description of all of the teacher and principal evaluation goals and how progress and the supporting data and benchmarks will be established across 1, 3, and 5 years of implementation would create a clear plan for the determining effectiveness. • Establish a means to evaluate outcomes related to improved teacher and administrator capacity as a result of professional learning would likely validate and strengthen professional development efforts. • Continue to seek out assistance from national experts and other states to ensure fidelity of implementation of the SLO process. • Engage school boards in order to build buy-in, given their role in working with superintendents to make personnel decisions. • Provide LEAs with technical assistance related to effective recruitment, hiring, induction, support, and evaluation of both school leaders and teachers.