# ESEA Flexibility
## *Peer Panel Notes*



**State Request:** Minnesota

**Date:** 12/06/11

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

## REVIEW AND EVALUATION OF REQUESTS

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

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

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

## Review Guidance

## Consultation

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

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

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

| CONSULTATION QUESTION 1 PANEL RESPONSE *Tally of Peer Responses:* 5 Yes, 2 No | |
|---|---|
| *Rationale* | There is evidence that teacher representatives were included in the development of Minnesota's request. |
| *Strengths* | State and Minneapolis union leadership was represented on the ESEA Flexibility Working Group that met for four full days over the course of four weeks. Meeting materials were made available online. The Title I Committee of Practitioners was consulted, with a member serving on the Working Group. |
| *Weaknesses, issues, lack of clarity* | The request states that adjustments were made to the proposal based on Work Group feedback, but there is no evidence of what specific adjustments were made as a result of feedback. |
| *Technical Assistance Suggestions* | Provide more clarity on how feedback from teacher representatives was used to make adjustments to the proposal. |

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

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

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

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

| CONSULTATION QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No* | |
|---|---|
| *Rationale* | Diverse stakeholders were represented on the Flexibility Work Group. |
| *Strengths* | Work Group members included parents, minority groups, business, and EL and SWD stakeholders. Meeting materials are published online. The state performed legislative outreach around the request. |
| *Weaknesses, issues, lack of clarity* | Some peers expressed concern that "minority groups" that were consulted were not identified in the request. The request states that adjustments were made to the proposal based on Work Group feedback, but there is no evidence of what specific adjustments were made as a result of feedback. |
| *Technical Assistance Suggestions* | Identify the specific Work Group members and their affiliations. Provide more clarity on how feedback from diverse groups was used to make adjustments to the proposal. |

## Overview

*Note to Peers: Staff will review Questions 1 and 3*

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

| OVERVIEW QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No* | |
|---|---|
| *Rationale* | The overview communicated the proposed approach across all 3 principles – standards and assessments, accountability, and teachers and leaders. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

| **1.B PANEL RESPONSE** *Tally of Peer Responses:* *4 Yes, 3 No* | |
|---|---|
| *Rationale* | The proposal includes information about the state's plan to engage in most of the transition activities outlined in the waiver request, as well as a timeline for transitioning to new standards that meets the required deadlines.

Some peers are concerned that the Minnesota Department of Education's (MDE) plan for transition lacks elements related to high quality professional development to support the transition to college- and career-ready standards. |
| *Strengths* | MDE has a defined plan for the implementation of new academic standards, including specific activities and timeframes. MDE has a similar plan for implementing WIDA standards.

Minnesota has adopted ELA Common Core standards and has used Achieve and IHEs to validate the state's mathematics content standards.

MDE is incorporating UDL in its curriculum design.

The proposal confirms MDE's commitment to providing English acquisition services and WIDA-based professional development to content-EL expert teams in order to support the educators' consideration and understanding of linguistic demands while teaching challenging content.

The state is partnering with numerous educator and administrator organizations for standards dissemination.

The MN Mathematics and Science Frameworks website provides useful instructional support materials aligned with math and science standards.

MDE's plan to expand access to postsecondary courses through dual enrollment, AP/IB, on-ramp models such as AVID, and participation in the EPAS system is robust and well supported.

Per the conference call (12/6/2011), the plan for Regional Centers for Excellence holds promise. |
| *Weaknesses, issues, lack of* | Professional development related to needs of students with disabilities is focused on special education teachers, |

| | |
|---|---|
| *clarity* | not on all teachers who teach students with disabilities.<br><br>WIDA-based professional development is not sufficient for ensuring access for ELs to learn the challenging content in the college- and career-ready standards.  Some members of the panel feel strongly that all content teachers need to be fluent in utilizing non-language multi-modal method consistent with the needs of their ELs to convey meaning related to all content, especially content beyond English language proficiency and reading, and content that is more complex.<br><br>Some members of the panel expressed concern that the MOU with the University of Minnesota and the Minnesota State College and Universities only states that the IHEs "are confident that a student who masters [math] standards will not need to take remedial coursework."  It does not articulate a clear policy that students who meet the math standards will be placed in credit-bearing, non-remedial, entry-level coursework.<br><br>Some members of the panel are concerned that relying on INTASC alone is insufficient to prepare all teachers for teaching the new, college- and career-ready standards. |
| *Technical Assistance Suggestions* | Provide professional development for school leaders and all content teachers that explains how to teach challenging content when ELs and students with literacy and language processing problems don't have access to the language typically used to explain the content.<br><br>Create instruction support materials for ELA along the lines of those provided by MN Math and Science Frameworks.<br><br>Articulate how educator prep programs will ensure that pre-service teachers are being prepared to teach the new standards.<br><br>Clarify the agreement between K-12 and IHEs regarding placement decisions for students who meet the math standards. |

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

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

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

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

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

## Principle 1  Overall Review

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

| **PRINCIPLE 1 OVERALL REVIEW** **PANEL RESPONSE** *Tally of Peer Responses:* *4 Yes, 3 No* | |
|---|---|
| *Rationale* | The proposal includes information about the state's plan to engage in most of the transition activities outlined in the waiver request, as well a timeline for transitioning to new standards that meets the required deadlines.   The state's assessment plan meets waiver requirements. Some peers are concerned that the Minnesota Department of Education's (MDE) plan for transition lacks elements related to high quality professional development to support the transition to college- and career-ready standards. |
| *Strengths* | MDE has a defined plan for the implementation of new academic standards, including specific activities and timeframes.  MDE has a similar plan for implementing WIDA standards. Minnesota has adopted ELA Common Core standards and has used Achieve and IHEs to validate the state's mathematics content standards. MDE is incorporating UDL in its curriculum design. The state is partnering with numerous educator and administrator organizations for standards dissemination. The MN Mathematics and Science Frameworks website provides useful instructional support materials aligned with math and science standards. MDE's plan to expand access to postsecondary courses through dual enrollment, AP/IB, on-ramp models such as AVID, and participation in the EPAS system is robust and well supported. |

|  | Per the conference call (12/6/2011), the plan for Regional Centers for Excellence holds promise. |
|---|---|
| *Weaknesses, issues, lack of clarity* | Professional development for all teachers related to the needs of ELs does not address content pedagogy (its focus is on English language proficiency through WIDA).<br><br>Professional development related to needs of students with disabilities is focused on special education teachers, not on all teachers who teach students with disabilities.<br><br>Some members of the panel expressed concern that the MOU with the University of Minnesota and the Minnesota State College and Universities only states that the IHEs "are confident that a student who masters [math] standards will not need to take remedial coursework." It does not articulate a clear policy that students who meet the math standards will be placed in credit-bearing, non-remedial, entry-level coursework.<br><br>Some members of the panel are concerned that relying on INTASC alone is insufficient to prepare all teachers for teaching the new college- and career-ready standards. |
| *Technical Assistance Suggestions* | Provide more information on professional development related to the needs of ELs to focus on content.<br><br>Create instruction support materials for ELA along the lines of those provided by MN Math and Science Frameworks.<br><br>Articulate how educator prep programs will ensure that pre-service teachers are being prepared to teach the new standards.<br><br>Clarify the agreement between K-12 and IHEs regarding placement decisions for students who meet the math standards.<br><br>Provide more information on how professional development will be delivered to train all teachers to meet the needs of diverse student populations to include students with disabilities and ELs. |

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

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

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

| 2.A.i PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*0 Yes, 7 No* | |
|---|---|
| *Rationale* | The proposed system of differentiated recognition, accountability, and support minimally meets the technical requirements. However, the panel has significant concerns that the expectations for raising achievement and closing gaps communicated through the MMR are insufficient.<br>The proposal identifies the Statewide System of Support (SSOS) as the primary vehicle for providing supports and interventions. Follow-up information provided by the state about the reorganization of the SSOS gives the panelists some confidence that this system will be strengthened and will be an effective support mechanism. |
| *Strengths* | The proposed Multiple Measures Rating (MMR) includes indicators of college- and career-readiness, including student achievement, growth, and graduation.<br><br>The proposal identifies the SSOS as the vehicle for school support and improvement. MDE provided information on how the SSOS is being reorganized in response to identified weaknesses with the existing system. |
| *Weaknesses, issues, lack of clarity* | Status achievement accounts for a relatively small percentage of the MMR. In addition, the status achievement measure—the weighted percentage of groups that made AYP—itself incorporates growth, since Minnesota is using a value-table growth model in its AYP determinations. The panel is concerned that this results in too little weight placed on students actually meeting standards.<br><br>Some panel members are concerned that the growth and achievement gap reduction indicators within the MMR are entirely normative, as opposed to communicating any expectation of growth to standard. |

| | |
|---|---|
| | The fact that MMR points earned in the growth, achievement gap reduction, and graduation rate indicators are based entirely on a school's performance relative to other schools, as opposed to any defined target for achievement, means that the MMR itself does not communicate changes in an individual school's performance, only its changes relative to other schools.<br><br>Subgroup graduation rates do not carry much weight in the MMR. As a result, schools might get a high MMR rating but have low graduation rates for particular subgroups. |
| *Technical Assistance Suggestions* | Consider ways to give status achievement more weight in the MMR.<br><br>Consider ways to include defined performance targets for growth and achievement gap reduction in the MMR. |

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**<br>Tally of Peer Responses:<br>*4 Yes, 3 No* | |
|---|---|
| Rationale | The proposed model meets technical requirements. However, some panel members are concerned that the expectations for raising achievement and closing gaps communicated through the MMR are insufficient. |
| Strengths | The proposed Multiple Measures Rating (MMR) includes indicators of college- and career-readiness, including student achievement, growth, and graduation. |
| Weaknesses, issues, lack of clarity | Status achievement accounts for a relatively small percentage of the MMR. In addition, the status achievement measure—the weighted percentage of groups that made AYP—itself incorporates growth, since Minnesota is using a value-table growth model in its AYP determinations. The panel is concerned that this results in too little weight placed on students actually meeting standards.<br><br>Some panel members are concerned that the growth and achievement gap reduction indicators within the MMR are entirely normative, as opposed to communicating any expectation of growth to standard. |

|  | The fact that MMR points earned in the growth, achievement gap reduction, and graduation rate indicators are based entirely on a school's performance relative to other schools, as opposed to any defined target for achievement, means that the MMR itself does not communicate changes in an individual school's performance, only its changes relative to other schools. <br><br> Subgroup graduation rates do not carry much weight in the MMR.. As a result, schools might get a high MMR rating but have low graduation rates for particular subgroups. |
|---|---|
| Technical Assistance Suggestions | Consider ways to give status achievement more weight in the MMR. <br><br> Consider ways to include defined performance targets for growth and achievement gap reduction in the MMR. |

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

| **2.A.i.b PANEL RESPONSE** <br> *Tally of Peer Responses:* <br> *4 Yes, 3 No* | |
|---|---|
| *Rationale* | Subgroup performance is included in the MMR through the achievement and gap reduction measures. However, some panel members are concerned that the metrics and weighting for those indicators are insufficient. |
| *Strengths* | Subgroup performance is included in the MMR through the achievement and gap reduction measures. |
| *Weaknesses, issues, lack of clarity* | The fact that MMR points earned in the achievement gap reduction indicator are based entirely on a school's performance relative to other schools, as opposed to any defined target for gap closure, means that schools could earn points in their category as a result of their gap stagnating or even widening, provided that other schools had less gap reduction. |

| | Subgroup graduation rates do not carry much weight in the MMR. As a result, schools might get a high MMR rating but have low graduation rates for particular subgroups. |
|---|---|
| *Technical Assistance Suggestions* | Consider non-normative gap closure targets. |

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

| **2.A.i.c PANEL RESPONSE** *Tally of Peer Responses:* *1 Yes, 6 No* | |
|---|---|
| *Rationale* | The performance of ELs and SWDs is represented in two of the MMR indicators. However, the proposal does not articulate targeted interventions focused on learning mathematics and ELA for ELs or SWDs. |
| *Strengths* | ELs and SWDs are included in both the proficiency and gap reduction components of the MMR. |
| *Weaknesses, issues, lack of clarity* | The articulated supports and interventions through the SSOS do not provide any information on targeting to ELs and SWDs specifically. |
| *Technical Assistance Suggestions* | Provide more information on interventions for SWDs and ELs. |

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

| 2.A.i.d PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*7 Yes, 0 No* | |
| --- | --- |
| *Rationale* | MDE proposes to begin implementing this system in winter 2012 and have full implementation by 2012-13 |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |

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

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

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

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

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

| 2.A.ii (INCLUDING QUESTIONS a AND b) PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No* | |
|---|---|
| *Rationale* | |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |
| ☒ *Not applicable because the SEA selected 2.A, Option A* | |

## 2.B        Set Ambitious but Achievable Annual Measurable Objectives

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

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

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

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

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

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

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

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

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

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

| 2.B AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No | |
|---|---|
| Rationale | |
| Strengths | |
| Weaknesses, issues, lack of clarity | |
| Technical Assistance Suggestions | |
| ☒ Not applicable because the SEA selected 2.B, Option A or Option B | |

## 2.C    Reward Schools

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

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

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

| 2.C.iii PANEL RESPONSE<br>Tally of Peer Responses:<br>5 Yes, 2 No | |
|---|---|
| Rationale | MDE has described its identification method. Based on the conference call on 12/6/11 MDE is proposing a promising plan for recognition and rewards. |
| Strengths | MDE is working with the state funder community to generate funds for reward schools, including the support of an audit of the best practices in reward schools and the sharing of best practices between reward and priority schools. |
| Weaknesses, issues, lack of clarity | Some members of the panel are concerned that the proposed visits by Commissioner or Governor may not be realistic for 15% of the schools in MN. |
| Technical Assistance Suggestions | No text |

## 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<br>(INCLUDING QUESTIONS (i)-(vii))<br>PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*3 Yes, 4 No* | |
|---|---|
| *Rationale* | The proposed interventions align with many of the turnaround principles. However, there is concern among some members of the panel that the description of the interventions lacks specificity. |
| *Strengths* | The MDE has identified interventions consistent with the turnaround strategies. The SSOS will provide curriculum audits, mapping and alignment strategies, professional development, and technical assistance on data use. Other interventions aligned with the turnaround strategies include comprehensive needs assessments, PLCs focused on using assessment data and building teacher capacity, and the intent to use results of new educator evaluation system to make staffing decisions. In addition, MDE has identified LEA responsibilities for supporting Priority schools. |
| *Weaknesses, issues, lack of clarity* | Some members of the panel are concerned that the proposal lacks specificity throughout its description of expectations and supports.<br><br>Schools are required to prepare school improvement plans, but there is no description of technical assistance, approval, monitoring, etc to ensure that the plans are effective responses to the actual challenges faced by the schools.<br><br>There is a lack of attention to staffing decisions prior to implementation of new principal evaluations in 2013-14 and teacher evaluation in 2014-15.<br><br>District roles are most often defined as working with MDE on specific areas, such as increasing operational flexibility and curriculum alignment, which may dilute the responsibility districts assume for their Priority Schools |
| *Technical Assistance Suggestions* | Clarify the process for review, approval, and monitoring of improvement plans.<br><br>Consider ways to address staffing in advance of the roll-out of the new teacher and leader evaluation system.<br><br>Consider ways to create greater district responsibility for Priority Schools. |

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

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

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

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

| 2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE *Tally of Peer Responses:* *3 Yes, 4 No* | |
|---|---|
| *Rationale* | MDE has identified practices that meet the turnaround principles. However, some members of the panel are concerned that the plan for implementing these practices is described in insufficient detail to give confidence in their likely impact, and that there is insufficient information about the primary implementation mechanism, the Statewide System of Support. |
| *Strengths* | MDE is revising the SSOS to strengthen it based on concerns with prior iterations. |
| *Weaknesses, issues, lack of clarity* | There in insufficient information on the SSOS, including staffing, capacities, responsibilities, authorities, and resources. There is insufficient information on how MDE will ensure that Priority Schools have access to strong teachers and principals before the implementation of the evaluations discussed in Principle 3. There are no defined consequences for Priority Schools that retain that Status for multiple consecutive years. There is insufficient detail specifically as it relates to ELs, and students with disabilities |
| *Technical Assistance Suggestions* | Given its critical importance in turnaround implementation, provide more information about the SSOS, including staffing, capacities, responsibilities, authorities, and resources beyond what's included in the RFP provided by MDE in supplemental materials. |

| | Provide more information on efforts to ensure that Priority Schools get strong teachers and leaders, especially before the new educator evaluation system is implemented. |
|---|---|

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

| **2.D.iii.c PANEL RESPONSE** <br> *Tally of Peer Responses:* <br> *0 Yes, 7 No* | |
|---|---|
| *Rationale* | MDE does not answer the question of whether Priority Schools will be required to implement interventions aligned with the turnaround strategies for at least 3 years. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | Provide information on the duration of required interventions. |

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

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

| **2.D.iv PANEL RESPONSE** <br> *Tally of Peer Responses:* <br> *7 Yes, 0 No* | |
|---|---|
| *Rationale* | The proposal states that Priority School identification will occur in spring 2012, and that all priority schools will implement all required interventions no later than 2014-15. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |

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

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

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

| 2.D.v and 2.D.v.a PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*7 Yes, 0 No* | |
|---|---|
| *Rationale* | The plan does provide exit criteria for Priority Schools – they must get above the 25$^{th}$ percentile on the MMR for 2 consecutive years. |
| *Strengths* | Per supplemental materials received from the state on 12/9, there is a substantive difference in performance between schools in the bottom 5% and schools at the 25$^{th}$ percentile of the MMR.<br><br>Schools must meet the exit criteria for two consecutive years. |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |

## 2.E      Focus Schools

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

| 2.E.i PANEL RESPONSE <br> *Tally of Peer Responses:* <br> *7 Yes, 0 No* | |
|---|---|
| *Rationale* | The proposal describes its methodology for identifying Focus Schools. The methodology will result in the identification of at least 10% of its Title I Schools being identified. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | Proposal meets the requirements. |
| *Technical Assistance Suggestions* | |

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

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

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

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

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

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

| 2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No* | |
|---|---|
| *Rationale* | Focus School Identification is based on performing in the bottom 10% of schools based on the Focus Rating, which is a combination of a weighted percentage of subgroups making AYP and growth gap reduction. |
| *Strengths* | The Focus Rating includes both status proficiency and growth. |
| *Weaknesses, issues, lack of clarity* | Some peers were concerned that the graduation rate measure is based on aggregate performance, not subgroup performance; as a result, identified schools will not necessarily be those with large gaps. |
| *Technical Assistance Suggestions* | |

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

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

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

| 2.E.iii PANEL RESPONSE *Tally of Peer Responses: 4 Yes,3 No* | |
|---|---|
| *Rationale* | Supports and interventions for Focus schools will be provided through the SSOS. |
| *Strengths* | Focus Schools must set aside 10% of Title I funds for school improvement activities. <br><br> Through the SSOS, Focus schools will have access to TA and support on areas such as data analysis, needs analysis, intervention planning, and assessment support. <br><br> MDE has developed and implemented an early indicator response system to identify students most at risk of dropping out. |
| *Weaknesses, issues, lack of clarity* | The narrative focuses on services rather than improving content instruction for all students in all classrooms – including EL and SWD. <br><br> The proposal does not acknowledge and propose a plan to address within-school disparities in access to effective teachers in Focus Schools. <br><br> The process does not delineate the responsibilities of an LEA in regard to its Focus School. <br><br> There are no consequences for schools that retain Focus status indefinitely. |
| *Technical Assistance Suggestions* | Provide professional development for school leaders and all content teachers targeted toward content development for ELs and SWDs. <br><br> Identify stronger consequences for identification as a Focus School for multiple consecutive years. <br><br> Identify the responsibilities of LEAs for their Focus Schools. |

**2.E.iv** Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

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

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

| 2.E.iv and 2.E.iv.a PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No | |
|---|---|
| *Rationale* | The proposal describes exit criteria as getting above the 25th percentile on the growth gap reduction. |
| *Strengths* | Per supplemental materials received from the state on 12/9, there is a substantive difference in performance between schools in the bottom 10% and schools at the 25th percentile of growth gap reduction. Schools must meet the exit criteria for two consecutive years. |
| *Weaknesses, issues, lack of clarity* | The metrics for identification and exit are different – schools are identified based on both the weighted percentage of subgroups making AYP and growth gaps. They are exited based only on growth gaps. This could create confusion among stakeholders. |
| *Technical Assistance Suggestions* | |

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

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

| 2.F PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*2 Yes, 5 No* | |
|---|---|
| *Rationale* | The proposal identifies categories of schools beyond Reward, Priority, and Focus. However, some members of the panel are concerned that there is not sufficient information about the supports or consequences for these other categories of schools. |
| *Strengths* | Creating a "Celebration School:" category, for which schools in the $16^{th}$ – $40^{th}$ percentile are eligible, could create incentives for improvement.<br><br>Identifying the Continuous Improvement Schools and working with their districts to improve planning is a promising approach to implementing a tiered system of support.<br><br>All schools will have increased public accountability on the basis of reporting of the MMR and its component indicators. |
| *Weaknesses, issues, lack of clarity* | Some peers felt there was a lack of specificity about what the incentive is to become a Celebration School. It was not clear from the state's request what rewards, recognition, or other incentives would be offered.<br><br>The proposal does not specify what happens when a Continuous Improvement School fails to improve.<br><br>The proposal does not address how the schools at $26^{th}$ – $59^{th}$ percentile schools will be supported to improve. |
| *Technical Assistance Suggestions* | Provide more information about incentives to become a Celebration School.<br><br>Provide more information about supports, interventions, and incentives for the large percentage of schools that are not Priority, Focus, Continuous Improvement, Celebration, or Reward. |

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

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

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

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

| **2.G.i PANEL RESPONSE** *Tally of Peer Responses:* 5 Yes, 2 No | |
|---|---|
| *Rationale* | MDE describes a process for monitoring and providing technical assistance to Priority and Focus Schools, as well as for monitoring and providing technical assistance to LEAs for their Continuous Improvement Schools. The proposal identifies the Statewide System of Support (SSOS) as the primary vehicle for providing supports and interventions.  Follow-up information provided by the state about the reorganization of the SSOS gives the panelists some confidence that this system will be strengthened and will be an effective support mechanism. |
| *Strengths* | MDE recognizes the need for a statewide system of support that uses a tiered system of support. MDE's plan to build a network of providers to help it address priority needs in their schools is promising. |
| *Weaknesses, issues, lack of clarity* | The proposed strategies for ensuring access for ELs to learning the challenging content in the college- and career-ready standards. There lacks sufficient detail regarding how all school leaders' and teachers' capacity will be built to provide equitable access to college and career ready standards for students with disabilities. |
| *Technical Assistance Suggestions* | Provide professional development for school leaders and all content teachers that explains how to teach challenging content, including ELs and students with disabilities. |

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

| **2.G.ii PANEL RESPONSE** *Tally of Peer Responses:* 0 Yes, 7 No | |
|---|---|
| *Rationale* | The proposal describes a process for district capacity-building.  However, the process lacks sufficient detail about what district capacities it intends to build. Moreover, the proposal is silent on achievement goals for districts, and supports or interventions for low-performing districts. |
| *Strengths* | MDE recognizes the role of the LEA for the implementation of school improvement plans. |
| *Weaknesses, issues, lack of clarity* | The MDE is expecting LEAs to hold schools accountable for implementing their plans but does not articulate a process with sufficient detail about the steps to be taken to support LEAs in this work.<br><br>The proposal does not identify any goals for district-wide achievement, nor does it identify any supports or interventions for low-performing districts. |
| *Technical Assistance Suggestions* | Consider district achievement goals aligned with the goals for schools in the MMR, and articulate supports and consequences for low-performing districts. |

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

| 2.G.iii PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No | |
| --- | --- |
| Rationale | MDE will fund turnaround interventions and other improvement activities through Title I set asides, SIG funds, and other federal funds that are not specified. |
| Strengths | |
| Weaknesses, issues, lack of clarity | The plan does not identify any state or local funding to be allocated to support the proposed system of recognition, support, and accountability. |
| Technical Assistance Suggestions | |

## 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**<br>**OVERALL REVIEW**<br>**PANEL RESPONSE**<br>*Tally of Peer Responses:*<br>*0 Yes, 7 No* | |
|---|---|
| *Rationale* | MDE has proposed a system of differentiated recognition, accountability, and support that meets the waiver requirements.  There is some evidence that the SSOS, which is the primary mechanism for supports and interventions, will provide effective services that are aligned with the turnaround principles. However, the panel has significant concerns that the expectations for raising achievement and closing gaps communicated through the MMR are insufficient.  Moreover, there are concerns about district roles in turnaround, and about the lack of district-level accountability. Finally, there are concerns about unclear expectations and incentives for the large percentage of schools that are not Priority, Focus, Continuous Improvement, Celebration, or Reward.<br><br>There are concerns regarding the lack of specificity regarding professional development and capacity building for all school leaders and teachers directly related to equitable access to content standards for ELs and students with disabilities. |
| *Strengths* | The proposal identifies the Statewide System of Support (SSOS) as the primary vehicle for providing supports and interventions.  Follow-up information provided by the state about the reorganization of the SSOS gives the panelists some confidence that this system will be strengthened and will be an effective support mechanism.<br><br>Interventions for Priority schools appear to align with the turnaround principles.<br><br>LEA responsibilities for Priority Schools are identified. |

|  | The exit criteria for Priority and Focus schools are rigorous. |
|---|---|
| *Weaknesses, issues, lack of clarity* | Status achievement accounts for a relatively small percentage of the MMR. In addition, the status achievement measure—the weighted percentage of groups that made AYP—itself incorporates growth, since Minnesota is using a value-table growth model in its AYP determinations. The panel is concerned that this results in too little weight placed on students actually meeting standards.

Some panel members are concerned that the growth and achievement gap reduction indicators within the MMR are entirely normative, as opposed to communicating any expectation of growth to standard.

The fact that MMR points earned in the growth, achievement gap reduction, and graduation rate indicators are based entirely on a school's performance relative to other schools, as opposed to any defined target for achievement, means that the MMR itself does not communicate changes in an individual school's performance, only its changes relative to other schools.

Subgroup graduation rates do not carry much weight in the MMR.. As a result, schools might get a high MMR rating but have low graduation rates for particular subgroups.
There are no consequences for schools identified as Priority or Focus that retain that identification for multiple consecutive years.

The district role in Priority School intervention appears to be limited largely to working with the MDE, which may limit he districts' sense of responsibility to these schools.
There are no clear goals for district achievement, or supports or interventions for low-performing districts.

The proposal identifies categories of schools beyond Reward, Priority, and Focus. However, some members of the panel are concerned that there is not sufficient information about the supports or consequences for these other categories of schools.

The narrative focuses on services rather than improving content instruction for all students in all classrooms – including EL and SWD. |
| *Technical Assistance Suggestions* | See TA throughout Principle 2 |

## Principle 3: Supporting Effective Instruction and Leadership

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

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

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

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

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

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

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

*Note to Peers: Staff will review iii.*

If the SEA selected Option B:

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

        *Note to Peers: Staff will review i and iii.*

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

| 3.A.i, OPTION B.ii PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No* | |
|---|---|
| Rationale | MN has adopted statutory language that applies statewide and includes detailed guidance on components of a comprehensive teacher and leader evaluation system aligned with Principle #3. Together with four other related statutes, MN has a strong foundation to build on. |
| Strengths | Minn. Laws 2011 SS Chap. 11 outlines specific parameters and guidelines for the adoption of teacher and principal evaluation systems.

The statute requires MDE to work with stakeholders to develop a model system based on the detailed parameters spelled out in the law.

The statute requires districts to adopt the model in those cases in which the school board and bargaining unit(s) cannot reach agreement. |
| Weaknesses, issues, lack of clarity | |
| Technical Assistance Suggestions | |
| ☐ Not applicable because the SEA selected 3.A, Option A or Option C | |

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

| 3.A.i OPTION B.iv PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No* | |
|---|---|
| Rationale | Two statewide working groups are working in consultation with MDE to create and publish a model teacher and principal evaluation process that complies with the statute. The principal working group is scheduled to complete its work by January 2012; the teacher working group is scheduled to complete its work by August 2012. |
| Strengths | The statutory foundation is in place and both work groups have been convened. |
| Weaknesses, issues, lack of clarity | |
| Technical Assistance Suggestions | |

| ☐ *Not applicable because the SEA selected 3.A, Option A or Option C* | |
|---|---|

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

| **3.A.i OPTION B.v PANEL RESPONSE**<br>*Tally of Peer Responses:*<br>*5 Yes, 2 No* | |
|---|---|
| *Rationale* | MDE has a broadly representative working group developing the guidelines, and has a plan for its work. |
| *Strengths* | Per supplemental material provided on 12/9, both a special education and an EL teacher are included in the work group for teacher evaluation. |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | Given the special challenging issues related to measuring growth for students with disabilities and English learners and their teachers, it would be wise to reach out to secure expert guidance in these areas for both work groups. |
| ☐ *Not Applicable because the SEA selected 3.A, Option A or Option C* | |

If the SEA selected Option C:

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

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

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

    *Note to Peers: Staff will review ii.*

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

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

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

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

a. Will be used for continual improvement of instruction?

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

| **3.A.ii.a PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No* | |
|---|---|
| *Rationale* | Whether the systems will be used for continual improvement can be fully assessed when the guidelines are completed by August 2012 and subsequently implemented. That said, it is encouraging that one of the statutes specifically requires connecting evaluation to professional development. |
| *Strengths* | The statute has provisions for induction, peer review, individual growth and development plans, and other means to support continual improvement of instruction (See subdivision 8 of ML 122A.40) |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

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

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

| 3.A.ii.b PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*7 Yes, 0 No* | |
|---|---|
| *Rationale* | Based on the supplemental materials received 12/8, MDE has made clear its expectation that the guidelines developed by summer 2012 will require at least 3 performance levels. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

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

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

| 3.A.ii.c and 3.A.ii.c(i) **PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No* | |
|---|---|
| *Rationale* | The statute requires three measures with measures of student learning constituting 35% of an educator's overall rating. The working groups are charged with developing a model consistent with the statutory guidelines. It is not clear from the proposal what plans are in place for ensuring that all measures are valid and for ensuring consistent, high quality implementation. |
| *Strengths* | For teacher evaluation, the statute requires the use of "an agreed upon teacher value-added assessment model for the grade levels and subject areas for which value-added data are available and establish state or local measures of student growth for the grade levels and subject areas for which value-added data are not available as a basis for 35 percent of teacher evaluation results." |
| *Weaknesses, issues, lack of clarity* | There is no statutory requirement that principal evaluation make use of measures of student learning. The proposal does address the need for a process for determining validity of the measures or a process for ensuring that districts will implement the measures in a consistent and high quality manner. |
| *Technical Assistance Suggestions* | Strengthen the role that measures of student learning play in principal evaluation. Describe the process to be used to develop a process for determining validity of the measures and a process for ensuring that districts will implement the measures in a consistent and high quality manner. |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

(ii)  For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide

approach for measuring student growth on these assessments?

| 3.A.ii.c(ii) PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No* | |
|---|---|
| *Rationale* | The plan calls for the use of the individual student growth from state assessments, and the working group is charged with developing details of how the growth component of the MMR will be applied. |
| *Strengths* | MDE anticipates looking to the work of other states that are further along in defining a statewide approach. |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | Building on the state's intent to examine emerging systems from other states, attend to the challenge of measuring growth and learning among students participating in "alternative assessment" and other students with significant disabilities. |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

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

| 3.A.ii.c(iii) PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No* | |
|---|---|
| *Rationale* | The statute requires the state model to "establish state or local measures of student growth for the grade levels and subject areas for which value-added data are not available".  The working group is addressing this issue and MDE has committed to submitting to USDOE for peer review and approval a copy of the guidelines it adopts by the end of the 2011-12 school year. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | Given the complexity of this work, panel members are concerned about the working groups' capacity to meet the deadline. |
| *Technical Assistance Suggestions* | |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

d. Evaluate teachers and principals on a regular basis?

| 3.A.ii.d PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*7 Yes, 0 No* | |
|---|---|
| *Rationale* | MN statute requires annual summative evaluation for probationary teachers and at least every three years for others. In addition, the statute requires 3 observations each year for probationary teachers and a peer review process for experienced teachers. For principals, summative evaluation is an annual process. The guidelines being developed will require these components of regular evaluation at a minimum. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | |
| *Technical Assistance Suggestions* | |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

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

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

| 3.A.ii.e PANEL RESPONSE<br>*Tally of Peer Responses:*<br>*0 Yes, 7 No* | |
|---|---|
| *Rationale* | The statute is very clear on requiring timely feedback for teachers, but not for principals. |
| *Strengths* | For teachers, the statute requires mentoring for probationary teachers, peer coaching and collaboration and peer review every three years, and the opportunity to participate in a professional learning community. The working group is incorporating the legislative mandate in the model they are developing. |
| *Weaknesses, issues, lack of clarity* | The statutory requirement for goals and feedback for principals is less specific. |
| *Technical Assistance Suggestions* | Develop in the model for principals more specific requirements for timely and useful feedback. |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

f. Will be used to inform personnel decisions?

| **3.A.ii.f PANEL RESPONSE**<br>*Tally of Peer Responses:*<br>*4 Yes, 3 No* | |
|---|---|
| *Rationale* | The statute lays the foundation for insuring that evaluation informs personnel decisions for teachers, but is less clear for principals. |
| *Strengths* | Statute requires that summative evaluation will be used for tenure decisions. The statute requires that failure to make adequate progress in the teacher improvement process must result in "discipline." The "discipline" may include a "last chance warning," dismissal, transfer, leave of absence or other discipline. Once evaluations are in place, priority schools are expected to use the result of evaluation to make staffing decisions.<br><br>Statute also requires that the summative evaluation be used for decisions related to principals. |
| *Weaknesses, issues, lack of clarity* | The statute requires, but does not define "adequate progress."<br><br>Consequences for principals are not defined with specificity. |
| *Technical Assistance Suggestions* | Ensure that the guidelines define how the evaluations will be used to inform personnel decisions related to principals.<br><br>Ensure that the guidelines provide guidance on the meaning of "adequate progress" |
| ☐ *Not applicable because the SEA selected 3.A, Option C* | |

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

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

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

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

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

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

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

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

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

| **3.B PANEL RESPONSE** *Tally of Peer Responses:* *0 Yes, 7 No* | |
|---|---|
| *Rationale* | While the statute lays a strong foundation to ensure that all districts adopt the model being developed by the working groups if local districts cannot reach agreement, MDE has an incomplete process to ensure effective LEA implementation. |
| *Strengths* | |
| *Weaknesses, issues, lack of clarity* | The plan makes no mention of monitoring of effective implementation by LEAs. The plan does not address the challenge districts face in negotiating collective bargaining agreements that are consistent with the forthcoming guidelines. |
| *Technical Assistance Suggestions* | Develop a plan for monitoring effective implementation at the district level. |

## Principle 3 Overall Review

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

| PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No* | |
|---|---|
| *Rationale* | MN has a strong statutory foundation for statewide implementation of an effective educator evaluation system. Working Groups are engaged in developing many of the specific components required for the waiver request and are on track to complete those by the close of the 2011-12 school year, when they plan to submit them to USDOE for peer review and approval. However, some key components required by the waiver are not yet assured, including: processes to ensure validity of multiple measures used at the state and district level, the use of evaluation results for principal personnel decisions, and a comprehensive plan for ensuring effective LEA implementation. |
| *Strengths* | Statutory base for teacher evaluation is quite comprehensive and prescriptive.<br><br>Engagement of stakeholders is underway. |
| *Weaknesses, issues, lack of clarity* | Statutory base for principal evaluation is not comprehensive or specific.<br><br>The proposal does address the need for a process for determining validity of the measures or a process for ensuring that districts will implement the measures in a consistent and high-quality manner.<br><br>Consequences for principals are not defined with specificity.<br><br>The plan makes no mention of monitoring of effective implementation by LEAs |
| *Technical Assistance Suggestions* | Given the tight timetable for working groups to complete their work, MDE needs to assure that the work groups will complete their work on time and may need to consider making effective use of expert advice and task groups to address the issues detailed above. |

## Overall Request Evaluation

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

| OVERALL REQUEST EVALUATION PANEL RESPONSE | |
|---|---|
| Rationale | The MDE provided an incomplete approach for implementing the request for the flexibility. |
| *Strengths* | The MDE has a foundation that will enable it to effectively address each of the Principles within its waiver request. |
| *Weaknesses, issues, lack of clarity* | Principle 1<br>MN has adopted ELA Common Core standards and has used Achieve and IHE to evaluate mathematics content standards. The proposal includes activities related to each of the areas requested, and a timeline for transitioning that comply with required deadlines. The plan lacks a description of resources needed and obstacles anticipated. However, a high quality request requires a coherent and comprehensive approach that clearly indicates how flexibility will help MDE and LEAs improve student achievement and the quality of instruction for all students. MDE's plan for transition lacks elements related to high quality professional development to support the transition to college- and career-ready standards.<br><br>Principle 2<br>MDE has proposed a system of differentiated recognition, accountability, and support that meets the waiver requirements. There is some evidence that the SSOS, which is the primary mechanism for supports and interventions, will provide effective services that are aligned with the turnaround principles. However, the panel has significant concerns that the expectations for raising achievement and closing gaps communicated through the MMR are insufficient. Moreover, there are concerns about district roles in turnaround, and about the lack of district-level accountability. Finally, there are concerns about unclear expectations and incentives for the large percentage of schools that are not Priority, Focus, Continuous Improvement, Celebration, or Reward.<br><br>Principle 3 |

|  | MN has a strong statutory foundation for statewide implementation of an effective educator evaluation system. Working Groups are engaged in developing many of the specific components required for the waiver request and are on track to complete those by the close of the 2011-12 school year, when they plan to submit them to USDOE for peer review and approval. However, some key components required by the waiver are not yet assured, including: processes to ensure validity of multiple measures used at the state and district level, the use of evaluation results for principal personnel decisions, and a comprehensive plan for ensuring effective LEA implementation. |
|---|---|
| *Technical Assistance Suggestions* |  |