ESEA Flexibility

Peer Panel Notes

State Request: North Carolina

Date: 03/26/2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

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

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

   Consultation Question 1 Panel Response
   Tally of Peer Responses: 5 Yes, 1 No

Response Component	*Peer Panel Response*
Rationale	• The North Carolina Department of Public Instruction (NCDPI) appears to have solicited the input from many advisory groups, organizations, and individuals. These lists can be found in Supplemental Attachment A (p. 225 of request). The NCDPI appears to have engaged stakeholders in a meaningful manner.
Strengths	• The NCDPI has summarized in its request the opportunities for consultation provided for each of the three principles, what individuals and groups responded to the items, what the NCDPI heard and, to some extent, what it did with the feedback that it received. This demonstrates a systematic process to seek input, summarize responses and indicate the tangible actions taken. The presentation of this information by the NCDPI is clear, concise and to the point. The NCDPI has conducted this feedback process over multiple years, especially concerning Principle 1.

Response Component	*Peer Panel Response*
Weaknesses, issues, lack of clarity	• It is not clear that the request was reviewed by teachers and other stakeholder groups, beyond the evaluation component. The request does not fully identify how the NCDPI received feedback from teachers; specifically, what did teachers think, what changes did they request, and how does the request address their concerns. The teacher work group was not identified as one that gave feedback specific to the request. Other stakeholder groups (p. 15) are identified, but no parallel process is clearly delineated for teacher input. It is unclear if NCDPI conducted follow-up consultations after receiving stakeholder input; the timeline does not provide sufficient reassurance that there was enough time to integrate stakeholder feedback. Nor did NCDPI fully summarize how the feedback was used or how the NCDPI responded. Lastly, there does not appear to have been participation from the largest counties. • Per the state call: the respondents noted that the State Board of Education has been working on these issues for 2-3 years. The state-level representative of educators attends each State Board meeting, participated in all discussions of the new accountability model, and signed on to the Common Core State Standards (CCSS). The presidents of several teacher organizations saw the draft of the flexibility request and NCDPI made a number of changes in the proposal. While it appears that teacher-representative organizations were involved in the process, the role of teacher input is not as clear.
Technical Assistance Suggestions	• By documenting how teacher and stakeholder input was incorporated in the request, NCDPI can address questions about consultation and how the request was modified as a result. The NCDPI should include the major points made during public review and its response.

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, 1 No

Response Component	Peer Panel Response
Rationale	• While parents and community members were among the individuals and groups consulted by the NCDPI, it is not completely clear how parents and other stakeholders were included and the need for documentation.
Strengths	• The NCDPI appears to have used a systematic approach to providing information of its request, and for gathering information from the individuals and groups informed of the NCDPI's request. • Per the state call: regarding parent and stakeholder feedback, state officials noted that there were multiple points for feedback in the 2-3 year process and the officials identified meetings and the type of feedback received.
Weaknesses, issues, lack of clarity	• It is not clear from the list of organizations and their members shown in Supplemental Attachment 1 which are community organizations and which, if any, were involved or invited to give input on NCDPI's request. There is a parent advocate on the Title I Committee of Practitioners as well as a Family and Community Task Force. In addition, on page 229 of the request, a list of parents consulted is provided. It is not clear whether these individuals were selected to represent any community organization. Were these individuals and groups informed of the pending changes in accountability (Principle 2)? This should be clarified. Also, it is unclear whether parents that did respond were given sufficient time to provide feedback to the NCDPI. Also, the parent list only includes 7 of the state's counties and does not capture the counties with the largest urban districts in the state. It is unclear whether advocates for English Learners were able to provide sufficient input into the request.
Technical Assistance Suggestions	• The state should document how stakeholder input was solicited and incorporated into the request in order to address questions about consultation and how the plan was changed as a result. The NCDPI should include the major points made by stakeholders during public review and its response, and include additional specificity regarding the different groups and geographical regions that participated in consultation.

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 NCDPI has adopted new high school graduation requirements that are being phased in over several years. The final phase, with the most prescriptive requirements, will begin for students entering ninth grade in 2012-13. The NCDPI has prepared for four years to implement more rigorous high school standards, and now has adopted the CCSS as well. Based on the CCSS, the NCDPI has created Essential Standards in all school subject areas.

Response Component	*Peer Panel Response*
Strengths	• The NCDPI has adopted the CCSS, and has created the Essential Standards for use in K-12 instruction in the state. It has resources from Race to the Top (RTTT) and other state and federal programs, and has used these over several years to focus on the preparedness of its graduates for postsecondary education and work. NCDPI's work has also focused on the "how" of school improvement. NCDPI's request also indicates steps that the state has taken to improve college and career readiness for students with disabilities and English learners. The timeline and combining of standards appears to be a helpful tool for principals, and positive in terms of scaling up the plan and sustainability. • The NCDPI's professional development calendar provides considerable time for teachers and principals to learn about the new standards (pp. 27&32). It has also considered pre-service instruction which will likely prove a valuable investment of time. NCDPI's decision to combine professional development around career standards, essential standards, and the educator evaluator system is also wise. Helping principals to combine and manage the two sets of standards should significantly reduce confusion and provide principals will useful leadership tools. NCDPI has made a good decision to rely on research for professional development evaluation and to differentiate delivery. NCDPI's insistence on ensuring that CCP programs allow students to build toward "tangible outcomes" is excellent. Requiring that students accrue transferrable credits or certification better couples college credits with career outcomes.
Weaknesses, issues, lack of clarity	• Reliance on "train the trainer" model (p. 29) may be overly ambitious for principals, who need time to understand the new standards. • The NCDPI's reliance on a train-the-trainer model (p. 29) may not be the most effective. With so many changes taking place at once, the state may be asking too much of practicing principals who still have responsibility for running their own schools and evaluating their own teachers. There is no indication of how the state will determine whether teachers and principals fully understand the new standards and associated interventions. Nor is there mention of how deficits will be addressed. NCDPI does not mention the possibility of accruing credits toward an associate's degree in its CCP programs (p. 33).
Technical Assistance Suggestions	• NCDPI should take responsibility for ensuring that each principal is properly informed and trained. If capacity-building is the goal, NCDPI should lay a more solid foundation on which to build during their subsequent leadership institutes.

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	• The NCDPI has created a large number of instructional and professional development programs. Many of the state's educators have been involved in the various professional development activities, which are designed with various groups (such as teachers and principals) in mind. Given the attention paid to this topic by various units of NCDPI, the variety of audiences addressed, and the variety of strategies used, it is highly likely that all students, especially students with disabilities and English Learners, will be provided the support targeted to achieve college- and career-ready standards. Longer term, the NCDPI is working with higher-education institutions to assist them in preparing new teachers and school leaders who understand and are able to assist all students in becoming college and career ready.
Strengths	• The NCDPI has been doing this work for several school years. The NCDPI's request is comprehensive, multi-faceted, and addresses a variety of audiences. The professional development activities blend in-person and on-line resources, thereby increasing local educator access to them. The NCDPI has also been creating instructional resources for local educators. The work also has involved colleges and universities, so that "college-ready" high school graduates will be more likely to find colleges ready to provide credit-bearing instruction to them. Finally, this spring the NCDPI is launching its "READY" campaign to provide educators, parents, and communities with the information necessary to understand and support the changes being implemented in the state.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• The request relies on models such as Universal Design for Learning (UDL) and Response to Intervention (RtI) but does not detail how NCDPI is incorporating CCSS into major initiatives, or how the standards are being translated into a student's Individualized Education Program (IEP); for example, it is unclear how the College and Career Promise (p. 33) affects English Learners and students with disabilities. It is unclear how the dual-language programs will be incorporated into the state system. The dual-language program section discusses the need for improved language proficiency but does not specifically address access to college- and career-ready standards. In Supplemental Attachment B, when outlining the occupational course-of-study requirements, it appears that students in this category would not be able to access college- and career-ready standards. • Per the state call: for the current year, students with disabilities are taking the general assessment in high school (general assessment with accommodations). NCDPI is developing new assessments for 2012-13 and has a plan to develop an alternate assessment based on modified academic achievement standards (AA-MAAS) for high school courses, which would be available not just for occupational course-of-study students but for all students with disabilities who meet the necessary criteria under their IEP. According to state officials, the bottom line is that students who take the occupational course-of-study are not a separate assessment group and their assessments will be aligned with general content standards.
Technical Assistance Suggestions	• The NCDPI should clarify its plan for helping English Learners and students with disabilities gain access to college- and career-ready standards. The NCDPI should clarify how dual-language programs and accompanying research will be incorporated into the state system. NCDPI should clarify who is eligible for the occupational course-of-study category and how those students will be provided access to college- and career-ready standards. It should directly address issues of reclassification in regards to college and career readiness and how it will monitor any aspect of the system of placement that leads to the denial of access to college- and career-ready standards. NCDPI should provide a cross-walk between the college- and career-ready standards work and reform initiatives for English Learners and students with disabilities such as UDL and RtI.

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 NCDPI's response to improving the college and career readiness of its students is exemplary. From the application, it is obvious that the NCDPI has developed a very extensive, multi-faceted and multi-modal approach to helping teachers and principals learn how to increase the post-secondary readiness of their students.
Strengths	• The NCDPI is to be commended for what is obviously a very wide and deep approach to systems change, involving both current educators and ones in preparatory programs. In addition, the commitment to post-secondary readiness is evident among the NCDPI, the chief state school officer, and the governor. Moreover, the NCDPI has been working on this initiative for several years. Such on-going effort is necessary in order change current instructional practices and to assure that such changes endure. The NCDPI presents an extensive, blended learning framework of professional development, demonstrating the rollout process and instructional application and resources to administrators and teachers.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It is unclear how the NCDPI will provide the professional development and resources specific to providing access to college- and career-ready standards for English Learners and students with disabilities. The request relies on UDL and RtI but does not detail how NCDPI is incorporating CCSS work into major initiatives, or how the standards are being translated into a student's IEP; for example, it is unclear how the College and Career Promise (p. 33) affects English Learners and students with disabilities. • Further, it is unclear how dual-language programs will be incorporated into the state system. The dual-language program section addresses the research base associated with improved language proficiency but does not specifically address access to college- and career-ready standards. • In Supplemental Attachment B, where NCDPI outlines the occupational course-of-study requirements, there remains a concern whether students in this category would be able to access college- and career-ready standards.
Technical Assistance Suggestions	• The NCDPI should make explicit its plan for helping English Learners, students with disabilities and students in low-performance categories gain access to college- and career-ready standards. The NCDPI should ensure that there is a process for supporting language proficiency and making explicit the link to academic proficiency, and a strong system for reassessment and reclassification of English Learners. • Further, as noted earlier, the NCDPI should clarify which students with disabilities are eligible for the occupational course-of-study category and ensure access to general education courses, rather than tracking them in grades 9-12 in the occupational course of study. Overall, the NCDPI should provide a clear cross-walk between college- and career-ready standards and reform initiatives for English Learners and students with disabilities.

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	• The NCDPI was one of the first states to implement a school accountability program in the mid-1990s and now is in the final phase of the design of a new accountability model, which is scheduled for implementation in the 2012-13 school year. The plan that NCDPI has set includes accountability for all traditional ESEA subgroups, and will include new measures – for example, ACT and Future-Ready Core scores – for which annual measurable objectives (AMOs) will be set. NCDPI developed a plan for differential support of its schools in 2007 (p. 46). The levels of support provided are shown on page 48.
Strengths	• The NCDPI's approach to accountability measurement and reporting is comprehensive. By including additional measures of college readiness (*e.g.*, ACT and Future-Ready Core scores) and other measures not federally required (*e.g.*, science performance), NCDPI is proposing a comprehensive differentiated recognition, accountability, and support system. Additionally, NCDPI will report student performance on the WorkKeys tests but will not use it for accountability purposes (p. 44). NCDPI's request details the use of a comprehensive needs assessment (pp. 49-50) of a district identified as needing the most intensive support and its schools.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It is not clear the methodology the NCDPI will use to reset its AMOs (p. 44); for example, what is the meaning of 'ambitious but feasible' targets once they are reset? This system has been in place for a number of years but NCDPI does not provide evidence to support that the system has improved student achievement and school performance, and does not indicate how its previous experience informs any changes in the current plan. What is the expectation of schools that have gone beyond the 3 years of accountability status under the current system, and how will they be addressed under the new proposed system of accountability? The NCDPI has not included information on how participation will be included in the accountability system.
Technical Assistance Suggestions	• The NCDPI should consider using evaluation data from support systems that have been in place since 2007 to inform supports and interventions that will be utilized moving forward. The NCDPI should clarify how it will support stakeholders in understanding the proposed accountability model as an indicator of school performance. • The NCDPI should provide information on how participation on assessments will be included in the accountability system.

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	• The NCDPI's request thoroughly describes the new accountability system that it is in the process of implementing. The system clearly includes attention to student achievement in reading/language arts and mathematics, as well as science (and ACT and Future-Ready Core at the high school level), and for all students and all subgroups of students identified in ESEA. Graduation rates are also included. School performance over time will emerge from the new system.

Response Component	*Peer Panel Response*
Strengths	• The NCDPI is proposing to report a much broader set of metrics than required. This appears to be targeted to help ensure that schools will attend to students' college and career readiness. The NCDPI's differentiated levels of support also may help districts and schools receive the assistance they need to improve their performance, thus maintaining progress over time. NCDPI also addresses the need to include the alternate assessment based on alternate academic achievement standards (AA-MAAS) for grades 3-8 and high school in the system.
Weaknesses, issues, lack of clarity	• In parts, it is difficult to identify what is included in NCDPI's system for public reporting and what is included for the purpose of accountability. For example, it is not clear how or if the growth measures being created with the assistance of the SAS Institute will be used in the new accountability system. There is an allusion to this on page 45 as being a variable (Education Value-Added Assessment System (EVAAS) growth data) that will be reported, but it is not clear that scores are used to actually hold schools accountable. NCDPI should provide clarification on this point in its request. It is also unclear how participation rate is included in the system. Additionally, there is concern regarding the state's minimum "n size" for including subgroups in the accountability model (pp. 59-60). • Per the state call: The state accountability model focuses on grades K-8 and high schools; performance is based on state assessments, and additional indicators are added in high school. As far as reporting, the additional information provided will not result in determining the status of a school. Rather, the state will be identifying reward, priority and focus schools for Title I, possible including non-Title I schools as well. State accountability information is provided so that stakeholders can disaggregate by subgroups and identify the strengths of a particular school beyond reading and mathematics. The goal is to bring the two systems together. With respect to the table on page 42, the state suggested it would present a column that includes performance, and the progress is the different targets (AMOs for reading and mathematics, as well as science for state), and a third column with EVAAS results. This table would also indicate school status on a school page (reward, focus, priority). Subgroups are as they appear in ESEA, with the addition of the academically gifted.

Response Component	*Peer Panel Response*
Technical Assistance Suggestions	• The NCDPI should clearly identify the difference between the data included for reporting and the components of the accountability model for the purpose of school identification — specifically, what subgroups and assessments are included under each component of the broader system. NCDPI should demonstrate the number of schools captured with the current proposed "n size" of 40 for subgroups and assess the potential for addressing the needs of additional schools with a smaller "n size" without significantly increasing measurement error.

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	• The NCDPI has used a previous version of its accountability system for school accountability for a number of years. The new system continues and extends these efforts. It is possible that the new system will continue to work to differentially recognize schools and serve to help them reduce gaps in student achievement, since this appears to be a factor in accountability in the new model (p. 44).
Strengths	• The NCDPI's past experience in school accountability, plus its plans for differentiated levels of support, indicate that it has the experience and knowledge to implement a system of differential recognition, accountability and support. The state system meets the requirements for an ESEA flexibility differentiated system.

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Weaknesses, issues, lack of clarity	• The allusion to gap closing found on the bottom of page 44 is the only place where this is mentioned, and it is not clear whether closing the gaps by 50 percent (as mentioned) is a part of NCDPI's accountability model. Comprehensive Support for District and School Transformation (p. 46) has been in place since 2007, but NCDPI does not provide ongoing research and evaluation that supports the strength of this model as being effective for closing achievement gaps and being used as the state's continuing model.
Technical Assistance Suggestions	• The NCDPI should present available data on Comprehensive Support for District and School Transformation that supports the model as effective in closing achievement gaps.

     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: NA

Response Component	Peer Panel Response
Rationale	• Per clarification provided by NCDPI [March 12th Addendum], science assessments will be used in the state's accountability model; however, the selection of priority, focus, and reward schools will use only reading/language arts and mathematics. Based on this information, this question is not applicable to the request review.
Strengths	NA
Weaknesses, issues, lack of clarity	NA
Technical Assistance Suggestions	NA

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

Response Component	Peer Panel Response
Rationale	• The NCDPI has not assured that each part of the definition for highest-performing schools has been met — *i.e.*, that all subgroups must meet their targets in order for a school to be eligible for selection in this category.
Strengths	• NCDPI has provided a step-by-step process by which highest-performing and high-progress schools will be identified.
Weaknesses, issues, lack of clarity	• It is not clear how NCDPI will handle the change in assessments in determining identification of schools after the first year — *i.e.*, what is NCDPI's transition plan? NCDPI does not provide the rationale for selecting the statewide average gap of 38.7 percent as an indicator for identifying the pool of reward schools. Moreover, it is not clear that the use of that percentage sets a rigorous enough bar for determining the pool of highest-performing schools. NCDPI should clarify that making AMOs in reading and mathematics (step 8) in order to qualify for reward status also translates to making targets for the "all students" subgroup and all other subgroups under any calculations, moving forward. There were concerns that the methodology for identifying highest-performing schools does not match the flexibility definition.
Technical Assistance Suggestions	• The NCDPI should explain how the methodology for calculating reward schools will work once the assessments change. It should consider a transition plan that includes the same level of detail as the current system. The NCDPI should clarify or provide justification for using a 3-year statewide average gap in its methodology. NCDPI should also clarify whether schools can fall into the two highest performing and reward categories without making their AMOs for all subgroups.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI has identified two sets of schools to recognize: those that performed at a high level and those that have shown high progress (p. 57). The NCDPI established a Title I Distinguished Schools Advisory Council comprised of the schools that have maintained high levels of performance or shown high levels of progress over a number of years (p. 62). The goal of this group is to assure that reward schools are sufficiently recognized and are used in school improvement activities statewide.
Strengths	• The NCDPI has taken a systemic approach to consultation in the development of this aspect of its accountability program. The use of the Advisory Council has helped to create a recognition program valued by schools and, more importantly, one that uses these schools in improvement efforts elsewhere in the state.
Weaknesses, issues, lack of clarity	• Some peers noted that a portfolio submission process may be an undue burden and an unnecessary additional step, while others felt this was a meaningful step to provide additional information on school initiatives that have led to successes. One peer felt that the list of forms of recognition may not be considered meaningful, but others felt that they would be meaningful.
Technical Assistance Suggestions	• NCDPI should consider linking rewards and creation of a portfolio to an opportunity for technical assistance to lower-performing schools. NCDPI should also consider doing a highlight study on its high-performing schools to identify best practices, or work with IHEs to implement a more robust study.

2.D   Priority Schools

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

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

  a.   Do the SEA's interventions include all of the following?

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

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

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

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

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

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

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

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

Response Component	Peer Panel Response
Rationale	• The NCDPI indicates that it is using the NC Indistar Tool to assure that LEAs "demonstrate that interventions are aligned to all turnaround principles and are selected with teacher, family, and community involvement" (p. 68). This tool guides the school through an assessment of school status on specific indicators for improvement. The result is a written plan about how the school will be addressing each of the improvement indicators.
Strengths	• The use of the Indistar Tool provides NCDPI with a consistent set of data on the intervention and improvement plans for each priority school.
Weaknesses, issues, lack of clarity	• While the Indistar Tool provides a tool for collecting data, NCDPI does not provide detail regarding how districts will use this tool to determine particular interventions, to set implementation targets, or describe the particular interventions selected at the school level. Actual interventions are described for School Improvement Grant (SIG) and RTTT schools, but for other schools the Indistar Tool is a form of data collection and a needs assessment that does not specify any link to interventions. Also, there is no explicit plan for professional development with linkages to interventions or information on how monitoring by the NCDPI will ensure implementation.
Technical Assistance Suggestions	• The NCDPI should provide more detail regarding how the results of the Indistar Tool will be used to drive meaningful interventions at the school level. It should also provide an explicit plan for professional development around linkages to interventions and information on how monitoring by the NCDPI will ensure implementation.

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: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• The types of interventions that schools may select to use, as evidenced in the Indistar Tool, are not described in the NCDPI's request. Schools can choose either one of the four SIG models, or implement a locally-developed one. Districts and NCDPI will monitor the implementation of the selected model (p. 68).
Strengths	• Districts and schools choose which intervention model to use in priority schools.
Weaknesses, issues, lack of clarity	• The request does not provide information on the types of changes that priority schools may choose to use, the role of the district in approving school plans, or how the NCDPI assures that the plans increase the quality of instruction, improve school leadership and teaching, and improve student achievement.
Technical Assistance Suggestions	• The NCDPI should provide more information on the actual interventions that may be selected by priority schools and its plan for monitoring implementation. It should also consider using best practices identified in reward schools to inform the improvement plans for priority schools, so that the NCDPI's role includes ssbeing a conduit of best practices to districts and schools.

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

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

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

2.D.iv Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI's request indicates that the interventions in priority schools must begin in the 2012-13 school year. The NCDPI also indicates that implementation will occur over a three-year period (p. 70).
Strengths	• The NCDPI has provided a detailed schedule of when reporting on interventions will occur, and when monitoring progress and annual reports are due (p. 70).
Weaknesses, issues, lack of clarity	• The NCDPI has not provided detailed information about interventions, so peers could not determine definitively if *meaningful* interventions aligned with the turnaround principles will be implemented, within the timeline provided, for schools beyond the SIG and RTTT schools already included as identified priority schools.
Technical Assistance Suggestions	• The NCDPI should provide clarity on the interventions beyond those in SIG and RTTT schools and provide assurance that the timeline will ensure that meaningful interventions are implemented.

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

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

2.D.v and 2.D.v.a Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• All priority schools will remain so for three years. If, at the end of three school years, a school is no longer designated as a priority school, it can exit that status. If a school continues to meet the criterion for a priority school, it will remain on the list (p. 70).
Strengths	• Schools are maintained in priority status for a sufficient number of years to implement and maintain meaningful change.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• It is not clear what supports are available to a school that exits priority school status. There is concern that a classification system that rank orders schools is normative, so the 'lowest 5 percent' is based on the performance of other schools, thereby leaving some high-need schools without support.
Technical Assistance Suggestions	• The NCDPI should identify the process to monitor the progress of priority schools. It should clarify the amount of progress a school must show to exit priority school status (p. 70).

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	• The NCDPI uses the criterion of reducing the gaps between the highest- and lowest-scoring subgroups in a school. This will serve to encourage focus schools to ensure that they are accountable for the performance of subgroups of students.

Response Component	Peer Panel Response
Strengths	• The NCDPI has laid out clear criteria and definitions for identifying focus schools (pp. 71-74), including clear identification of what constitutes the largest within-school gaps and low-subgroup proficiency.
Weaknesses, issues, lack of clarity	• In the request it is unclear how high school students who take an alternate assessment based on modified academic achievement standards (AA-MAAS) are counted for the purpose of the accountability definition. The business rules do not provide information to indicate that participation rate is factored into calculations for identifying focus schools. Per the state call, NCDPI clarified that for the current year, students with disabilities are taking the general assessment in high school (general assessment with accommodations). NCDPI is developing new assessments for 2012-13 and has a plan to develop an alternate assessment based on modified academic achievement standards (AA-MAAS) for high school courses, which would be available not just for occupational course-of-study students but for all students with disabilities who meet the necessary criteria under their IEP. According to state officials, the bottom line is that students who take the occupational course-of-study are not a separate assessment group and their assessments will be aligned with general content standards. This resolved peer concerns regarding this issue.
Technical Assistance Suggestions	• NCDPI should provide clarity in its business rules about the role of participation rate in calculations for identifying focus schools.

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

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

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

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

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

Response Component	Peer Panel Response
Rationale	• Although NCDPI provided a list of interventions, it did not provide examples of the interventions that it will require of focus schools (p. 75). The list is essentially drawn from the USED-provided intervention list, without much explanation or justification.
Strengths	• The list provided by the NCDPI is drawn from the list of potential interventions provided by USED.
Weaknesses, issues, lack of clarity	• The NCDPI should provide a list of example interventions, with justifications for how the interventions address the particular needs of subgroups. In addition, the NCDPI should indicate what, if any, steps it will use to review, approve and monitor the plans from districts and focus schools. Lastly, there is no mention of the use of the Indistar Tool for focus schools and whether it would be used to determine interventions for focus schools as well as priority schools.
Technical Assistance Suggestions	• If the NCDPI wants to give districts leeway in the interventions used, it should still clearly describe how districts will be supported in determining the proper interventions and provided professional development to ensure those interventions are implemented properly. One mechanism would be a table that lists the applicability of interventions to each of the subgroups identified, different school levels, different school needs, and the research base with references. NCDPI might accomplish this by detailing a systems approach, including direct alignment with strategies proposed in order to implement college- and career-ready standards and close achievement gaps in section 1. It should also consider using best practices identified in reward schools to inform the improvement plans for focus schools, so that the NCDPI role includes being a conduit of best practices to districts and 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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• Like priority schools, focus schools remain in this status for three years, and they exit from it only if they are not on the list of focus schools at the end of three years. If a school has not shown progress and is still on the list of focus schools, it will remain a focus school.
Strengths	• The criteria developed by NCDPI are relatively easy for schools to understand and apply. By retaining a school as a focus school for three years, the school will have time to implement a sustained intervention program that will lead to meaningful change.
Weaknesses, issues, lack of clarity	• It is unclear whether a focus school in which performance declines markedly can become a priority school. If so, can it become a priority school at any time, or only at the conclusion of the three-year period of being a focus school? Similarly, there is no mention of next steps for focus schools that remain focus schools after three years
Technical Assistance Suggestions	• The NCDPI should delineate the process to monitor the progress of schools. It should clarify the amount of progress necessary to exit from focus school status (p. 76).

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

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

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

Response Component	Peer Panel Response
Rationale	• The narrative provided by NCDPI on pages 91-94 of its request describes how NCDPI is working internally and externally to coordinate its activities. However, this narrative does not provide much detail about how it will be working with other Title I schools (those not priority, focus or reward schools). While the request provides a rationale for not using a "one size fits all" approach, the manner in which this process works for these schools should be provided.
Strengths	• The NCDPI is approaching its work with the other Title I schools from a constructive perspective. It is attempting to coordinate resources from the SEA level.
Weaknesses, issues, lack of clarity	• While NCDPI provides a rationale for not using a "one size fits all" approach to accountability for other Title I schools, the manner in which the process works for these schools is unclear. NCDPI should clarify the systems-level processes involved, including how NCDPI is monitoring the improvement activities of its schools and the role of the SEA and districts. Because this is an existing system, it may not be providing additional differentiated supports to schools. Schools with persistently low-performing subgroups that do not enter priority or focus school status may not receive sufficient support needed to close the gaps.
Technical Assistance Suggestions	• The NCDPI should provide detailed information on how the SEA and districts will address the needs of the other Title I schools, including how resources are allocated to the schools with particular subgroup needs. NCDPI should consider using best practices identified in reward schools to inform the incentives and supports in other Title I schools, so that NCDPI's role includes being a conduit of best practices to districts and schools. NCDPI should identify the specific supports available to schools with persistently low-performing subgroups that do not enter priority or focus school status.

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

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

Response Component	Peer Panel Response
Rationale	• It is difficult to ascertain whether the activities of the NCDPI, the regional agencies and districts will improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities. The two subgroups are not addressed in this section of the application.
Strengths	• None provided.
Weaknesses, issues, lack of clarity	• The NCDPI's request is missing sufficient detail to demonstrate that it will improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities.
Technical Assistance Suggestions	• A more detailed plan and illustrative activities for focus, priority and other Title I schools should be provided by NCDPI. The NCDPI should identify the specific incentives and supports designed to address the performance of low-performing subgroups, including English Learners and students with disabilities.

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

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

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

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

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

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

2.G (including i, ii, and iii) Panel Response
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• The NCDPI indicates that a combination of on-site and desk monitoring will be carried out for priority and focus schools, and their districts. Districts with priority schools are examined for their capacity to bring improvements to their schools. Such reviews occur at least once a year (p. 95). Districts with identified focus schools are reviewed once every three years during cross-program monitoring, although, depending on the nature of the needs, they might be examined more frequently (p. 95). Districts that lack the capacity to foster improvements to their schools are provided resources by the NCDPI.
Strengths	• The NCDPI appears to be maintaining monitoring procedures and practices that it has had in place for several years.

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Weaknesses, issues, lack of clarity	• It is uncertain whether the planned activities described by NCDPI are likely to improve district capacity to support school improvement or result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools. Reviewers raised significant concerns regarding the Disadvantaged Student Supplemental Funding (DSSF) index (p. 97) and how this fits into the system and its use as a method to define district capacity. Peers were very concerned about defining district capacity as a combined index of the DSSF index and the low-wealth percentage and questioned whether the measures in the index truly identify capacity of a district or rather identify needs in a community – distinct from district capacity to improve student achievement and close gaps. Beyond the question regarding how district capacity is determined, the NCDPI also does not elaborate on the process to address any actual district-level capacity needs. There appears to be no district accountability in this model. Reviewers raised questions about how districts fall into each category based on the size of their achievement gaps. What is the link between this process and the process identified on page 97?
Technical Assistance Suggestions	• The NCDPI should detail a more aggressive plan for building a district's capacity to assist its priority and focus schools, beyond the annual in-person and desk review for districts with priority schools and once every three years for focus schools.

Principle 2 Overall Review

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

Principle 2 Overall Review Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• There are many areas in this part of the NCDPI's request that need additional clarification. For example, the types of interventions that priority and focus schools can choose to use, whether and how districts and NCDPI approve intervention plans, how NCDPI and districts work with priority, focus and other Title I schools, and the process for district-level accountability and support for improvement are all unclear.
Strengths	• The NCDPI has a long history of developing and using school accountability for school improvement purposes. It is enhancing the previous system by adding additional indicators to it, especially at the high school level.
Weaknesses, issues, lack of clarity	• The areas indicated above are all ones for which more information is needed. Although some of these activities have been implemented for several years, there is no evidence provided that the activities are supported by historical data. What evidence does the NCDPI have that these activities are adequate for serving the needs of schools and districts?
Technical Assistance Suggestions	• While the identification process is strong overall, the NCDPI should develop an evidence-based plan that provides greater specificity about the connections among identification, intervention, and oversight, including the type of guidance that will be provided to districts concerning the nature and quality of interventions as well as the differentiation across interventions, specifically as it relates to the different categories of schools and student subgroups. In addition, the NCDPI should make explicit the link between monitoring the system and associated feedback.

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?

<u>If the SEA selected **Option A**</u>:
If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3:

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

3.A.i, Option A.i Panel Response
☒ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: NA

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

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

3.A.i, Option A.ii Panel Response
☒ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: NA

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

   iii.   <u>*Note to Peers: Staff will review iii.*</u>

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI has been using a statewide system to evaluate teacher and principals for several years, and recently added growth in student performance as another standard for both evaluation systems.
Strengths	• NCDPI's experience in providing standards and support to implement an evaluation system based on those standards will assist it as the student growth component is added to the system. The prominent place of teacher self-assessment and professional development strengthens this model. The annual assessment of principals also strengthens it, as do the "artifacts" outlined on page 114.
Weaknesses, issues, lack of clarity	• On page 101, it appears that the type of evaluation teachers receive is based on career status rather than prior year's performance; this concerns some peers. It is also unclear whether there is evidence of improvement shown through teacher artifacts, and whether there is tangible support for teacher self-assessments. There does not appear to be a requirement for training and professional development of evaluators such as school principals.
Technical Assistance Suggestions	• The NCDPI could specify what additional circumstances might trigger a teacher to receive a full evaluation, such as changing buildings or teaching assignment, and on what basis administrators could not use the abbreviated evaluation for teachers. External objective criteria should be a part of this determination. NCDPI should ensure teachers receive professional development regarding the evaluation system.

   ii.   <u>Note to Peers: Staff will review ii.</u>

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

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

☐ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: 6 Yes, 0 No

Response Component	*Peer Panel Response*
Rationale	• The NCDPI indicated that an Educator Effectiveness Work Group that contained teachers and representatives of teacher organizations developed recommendations for the State Board of Education on inclusion of growth in the NC teacher and principal evaluation systems. The remaining standards were created earlier by a group inclusive of educators and educator organizations.
Strengths	• A number of groups and individuals participated in creating the state's educator evaluation standards. In addition, the newly drafted standards are being extensively reviewed by 24 regional focus groups of educators.
Weaknesses, issues, lack of clarity	• While groups have been identified, their contribution to the development of the final guidelines is unclear. It is also unclear whether there is adequate representation of teachers in the Educator Effectiveness Work Group outlined on page 118.
Technical Assistance Suggestions	• NCDPI should provide a clarification of the roles of different participants in the Education Effectiveness Work Group.

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?*

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3.A.ii.a Panel Response

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

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI's standards contain a number of standards that focus on the work of teachers and school leaders to improve student achievement using a variety of instructional techniques. Thus, because the standards focus on the quality of teaching, the evaluations will focus on aspects of teaching that will likely lead to improved student performance.
Strengths	• The standards for teacher and principals appear to be thorough, carefully drawn up, and tied to professional development. The NCDPI is working on further developing Measures of Student Learning for teachers of English Learners and students with disabilities.
Weaknesses, issues, lack of clarity	• The manner in which the results of educator evaluations are used to improve teaching or school leadership should be drawn out more carefully. For example, the manner in which the use of the standards in educator evaluation to assist educators to improve their practice via professional development and other activities could be explained more fully. There is a minor reference to this on page 110 but only for school leaders. In addition, the inclusion of artifacts to measure each school leader is helpful; more information on the use of artifacts for teachers would be equally helpful. There is little reference to the evaluation of teachers of English Learners and students with disabilities, or that the system has been structured to take the specific needs of these teachers into account. NCDPI does not elaborate on the intensity of the growth plan necessary to improve instruction.
Technical Assistance Suggestions	• The NCDPI should provide the information necessary to understand how the evaluations are used to improve teaching and school leadership by detailing more of the professional development required to implement the system and ongoing professional improvement that results from it. In addition, the NCDPI should more clearly delineate how the system will improve the practice of teachers of English Learners and students with disabilities.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI includes multiple levels of performance.
Strengths	• As shown in Attachment 10, the NCDPI has a very complete and systematic system for teacher and school leader evaluation.
Weaknesses, issues, lack of clarity	• On the face of the request, the manner in which student growth in achievement is factored into the evaluation of teachers or school leaders is not clear, particularly as to how new standards incorporating growth are weighted compared to the other standards. • From the state call: NCDPI explained that the standards are the expectation of what teachers need to know to demonstrate proficiency in teaching. There is no weighting system that ascribes a certain percentage to each standard; rather, each standard counts separately, and a teacher needs to demonstrate certain competencies on each. A teacher needs to meet each of six or eight standards, or else the teacher is placed in the "needs improvement" category. • Based on the state call, peers feel this issue has been addressed. However, they raised the question of how, because there is no weighting system, NCDPI uses the results of ratings on individual standards to inform an overall teacher rating.
Technical Assistance Suggestions	• The NCDPI should incorporate into its request the information provided on the call as well as information on how growth in achievement is used in its educator evaluation system once the State Board of Education approves the manner in which this occurs.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI has identified processes to assure that the measures used in its educator evaluation system are used in a valid manner – with adequate preparation and training on use.
Strengths	• The NCDPI has identified multiple measures that can be used to evaluate teachers and school leaders. The NCDPI includes measures of student learning for non-tested grade levels. It is also providing online tools for certifying teacher evaluators.
Weaknesses, issues, lack of clarity	• The NCDPI's request provides little or no information on the process to ensure that the evaluation system is implemented in a valid manner. While the proposal to hire additional staff to oversee training on the valid use of the system is commendable, peers are concerned that hiring only one person raises capacity concerns. There is a lack of monitoring to ensure calibration is maintained throughout the process.
Technical Assistance Suggestions	• The NCDPI should provide information on the technical qualities of its educator evaluation system, if it has such data, or it should be collecting such information so as to continue to enhance the capabilities of participants to carry out the evaluation functions in a technically sound manner. The NCDPI should elaborate on how it will maintain consistency over multiple years.

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

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

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

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI proposes to use its current system of assessments for measuring growth, transitioning to the Smarter Balanced Asessment Consortium assessments when those become available.
Strengths	• The NCDPI has been measuring growth and using such measures for several years. Recently, it has engaged the SAS Institute to create enhanced growth measures. The NCDPI is piloting a team growth value.
Weaknesses, issues, lack of clarity	• None provided.
Technical Assistance Suggestions	• NCDPI should consider the balance of team and school-wide growth so as not to over-emphasize the percentage of an individual teacher's evaluation that is based on this component.

(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: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	• The NCDPI indicates that measures for non-ESEA required grades and subjects are under development (pp. 121-122). Given the level of effort indicated there, local districts and schools should have quality measures to choose from.

Response Component	Peer Panel Response
Strengths	• The NCDPI appears to be using an external vendor to create the actual measures for the Standards for Learning that are teacher-created.
Weaknesses, issues, lack of clarity	• It was unclear in the request when these measures will be completed or how they will be provided to local educators – for example, will they be state-administered and state-scored or will this occur locally or even by individual teachers? The NCDPI does not provide information on incorporating growth for English Learners and students with disabilities moving from the AA-MAAS. • From the state call: NCDPI indicated that it has brought together over one thousand teachers to design assessments for other grades and subjects. For teachers of students with disabilities, NCDPI is running a pilot looking at assessment data from school year 2011-12 — *e.g.*, looking at value-added scores for a whole class or for students with disabilities in a teacher's caseload. NCDPI brought teachers together in October and then a smaller group in December to provide a feedback loop regarding how they teach each standards, how they feel each standard is best assessed; and to created blueprints that are sent to the vendor. As the vendor generates items from blueprints, NCDPI will bring back the teachers in June to revise in order for staff at NCDPI to begin assembling items for administration next year. NCDPI may create two forms per year and then generate new forms as it continues implementing the system over the next several years. NCDPI expects these assessments will go online in the 2012-13 school year. For first year, NCDPI is conducting field tests and operational runs, including more items than necessary. It has a psychometric plan and a validity framework. RTT districts are developing assessments on their own with NCDPI stepping in to facilitate the process, but many of the decisions about administration and scoring will be left up to the districts' discretion as they determine the evaluation. NCDPI continues to have concerns about measuring growth in subject areas that are not taught in a standardized way, such as the arts where there is variability in how much time a teacher spends with the students. NCDPI is working to try to address this. • Based on information from the state call, reviewers still sought additional documentation on initiatives and their status.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• The NCDPI should provide more clarity on the development and use of these measures and explain how the NCDPI will check the validity of these measures, including the use of data collected through piloting. NCDPI should provide clarification on where it is in the development process for evaluating teachers of non-tested grades and subjects, teachers of English Learners, and teachers of students with disabilities. Will NCDPI pilot its system and, if so, when?

d.   Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response
☐ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The NCDPI appears to be committed to using the state achievement measures, as well as those to be created for the non-state assessed grades and content areas, for the regular evaluation of teachers and principals.
Strengths	• The State Board of Education and legislature appear to support the use of achievement measures for the purpose of educator evaluation.
Weaknesses, issues, lack of clarity	• It is unclear whether there is a trigger beyond career status for more extensive evaluation.
Technical Assistance Suggestions	• None provided.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• In its request and Attachment 10, there appears to be a commitment to using the evaluation results to guide the differential professional development of both teachers and principals.
Strengths	• Such differential professional development is spelled out in the State Board of Education policies (see Attachment 10, pp. 191-192). A teacher and administrator must meet to discuss all observations and any artifacts the teacher wants to submit. The on-line system for items submitted by the teacher must be monitored by principals.
Weaknesses, issues, lack of clarity	• It appears that NCDPI permits districts to decide whether the professional development needed by educators is provided. It is not clear whether NCDPI has a processes in place to assure that local educators actually receive the professional development that their evaluations indicate that they need. It is unclear how ratings will impact teachers in the following year.
Technical Assistance Suggestions	• The NCDPI should provide clarification on its expectations regarding district responsibilities on monitored and directed growth plans.

f.   Will be used to inform personnel decisions?

3.A.ii.f Panel Response
☐ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• In its request and Attachment 10, there appears to be a commitment to using the evaluation results to inform personnel decisions about teachers and school leaders.
Strengths	• The NCDPI has indicated that the results of educator evaluation should inform personnel decisions.
Weaknesses, issues, lack of clarity	• NCDPI appears to permit districts to decide how the evaluation results will inform personnel decisions. While NCDPI indicates that results of educator evaluation should inform personnel decisions, it is not clear whether NCDPI has processes in place to assure that local educators' evaluation results are actually used in personnel decisions and whether districts will use the system in the intended manner.
Technical Assistance Suggestions	• As part of monitoring at the state level, NCDPI should consider adding indicators in its on-line system showing the extent to which districts are using educators' evaluation results to inform personnel decisions, including the equitable distribution of effective teachers.

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?*

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3.B Panel Response

Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• The system that NCDPI uses has been under development and implementation for several years, thus increasing the likelihood that it is being implemented in a sound manner. The NCDPI has an on-line data collection tool that it has used to collect information on the manner in which districts are implementing educator evaluations.
Strengths	• NCDPI already has a system that has been developed and is being implemented. It has already addressed the issues involved in doing this. The statewide on-line evaluation system places NCDPI in a good position to monitor. Beginning teacher evaluations are monitored by the State's Regional Education Facilitators through desk and on-site reviews.
Weaknesses, issues, lack of clarity	• The manner in which student achievement scores – especially growth – is incorporated into educator evaluations still needs to be decided. Once decided, local educators will need help in understanding the information and using the data appropriately.
Technical Assistance Suggestions	• NCDPI may consider summarizing lessons learned from multiple years of piloting and how this informs their work today.

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: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	• NCDPI has already developed many of the components of its educator evaluation system. Thus, it is in a good position to add the growth in student achievement component to it in a successful manner, once decided by its State Board of Education. The NCDPI is moving forward with the implementation of an annual multiple-measure teacher and principal evaluation based both on a structured set of core competencies and the use of student results.
Strengths	• The strength of the North Carolina educator evaluation system is that it has already been developed and was created with the input of educators. The prominent place of teacher self-assessment and professional development strengthens this model. The annual assessment of principals also strengthens it. In regards to non-tested subjects and grades, the NCDPI is engaged in a process to develop assessments with teachers.
Weaknesses, issues, lack of clarity	• NCDPI should further elaborate how the system will be refined, the training provided for teachers, and how the information for non-tested grades and subject areas will be incorporated, and further elaborate on its process for monitoring the overall process of implementation, including the use of assessment results in personnel decisions.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• The NCDPI may consider summarizing lessons learned from multiple years of piloting and how this informs their work today. • The NCDPI should provide information on the technical qualities of its educator evaluation system, if it has such data, or it should be collecting such information so as to continue to enhance the capabilities of participants to carry out the evaluation functions in a technically sound manner. NCDPI should elaborate on how it will maintain consistency over multiple years. • The NCDPI should provide more clarity to explain how it will check the validity of these measures, including the use of data collected through piloting. NCDPI should provide clarification on where it is in the development process for evaluating teachers of non-tested grades and subjects, teachers of English Learners, and teachers of students with disabilities. • The NCDPI should provide the information necessary to understand how the evaluations are used to improve teaching and school leadership by detailing more of the professional development required to implement the system and ongoing professional improvement that results from it. • The NCDPI could specify what other circumstances might trigger a teacher to receive a full evaluation and on what basis administrators would not use the abbreviated evaluation for teachers. • As part of monitoring at the state level, NCDPI should consider adding indicators in its on-line system showing the extent to which districts are using educators' evaluation results to inform personnel decisions, including the equitable distribution of effective teachers.

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	• The NCDPI has taken considerable steps to implement the requirements for Principles 1 (College and Career Ready Expectations) and 3 (Educator Evaluation). For example, NCDPI's response to improving the college and career readiness of its students is exemplary. From the request, it is obvious that NCDPI has developed a very extensive, multi-faceted and multi-modal approach to helping teachers and principals learn how to increase the post-secondary readiness of their students. • The NCDPI has detailed a comprehensive system for school accountability in its request. However, there are many areas within Principle 2 (School Accountability) that appear to be missing or weak. For example, the types of interventions that priority and focus schools can choose to use, whether and how districts and NCDPI approve intervention plans, how NCDPI and districts work with priority, focus and other Title I schools, and the process for district-level accountability and support for improvement are all unclear. • For Principle 3, NCDPI has been using a statewide system to evaluate teacher and principals for several years, and recently added growth in student performance as another standard for both evaluation systems. NCDPI should further provide further information on its role in monitoring the process of implementation and use of the evaluation results.
Strengths	• The NCDPI's work in preparing students and schools to implement college- and career-ready instruction and assessment, as well as its efforts to amend its educator evaluation system to add student growth measures are areas of strength in the request. • The NCDPI is to be commended for what is obviously a very wide and deep approach to systems change, involving both current educators and ones in preparatory programs. In addition, the commitment to post-secondary readiness is evident among NCDPI. Such on-going effort is necessary in order change current instructional practices and to assure that such changes endure. NCDPI presents an extensive, blended learning framework of professional development demonstrating the rollout process and instructional application and resources to administrators and teachers.

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Response Component	Peer Panel Response

Weaknesses, issues, lack of clarity	• The areas of weakness in Principle 2 are:
	
	    o How the needs of priority, focus and other Title I schools are addressed by its districts;
	
	    o How intervention plans are created and reviewed by districts and NCDPI; and
	
	    o That monitoring of priority and focus schools, in particular, should happen on a more regular basis.

Technical Assistance Suggestions	• The NCDPI should fully describe an integrated and comprehensive approach to the development, implementation and monitoring related to all three principles. • The NCDPI should provide actions, timelines, and commitment of resources for addressing the needs of English learners and students with disabilities for Principles 1, 2 and 3. • The NCDPI should develop an evidence-based plan that provides greater specificity about the connections among identification, intervention, and oversight of schools and districts, including the type of guidance that will be provided to districts concerning the nature and quality of interventions as well as the differentiation across interventions, specifically as it relates to the different categories of schools and student subgroups. In addition, NCDPI should make explicit the link between monitoring the system and associated feedback. Overall, NCDPI should clarify and expand upon efforts to work with priority, focus, and other Title I schools as noted in response to sections 2.D, 2.E, and 2.F above. • For Principle 3, NCDPI should provide greater clarity on its monitoring of the implementation and use of the systems to improve teacher and principal effectiveness. • If the areas of weakness in Principle 2 are addressed forthrightly and thoroughly, many of the concerns contained in this review can be addressed.