
ESEA Flexibility

Peer Panel Notes



State Request: Massachusetts

Date: 12/09/11

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.

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: *Rationale* Massachusetts meaningfully engaged and solicited input on the request from teachers and their representatives.

7 Yes

0 No

Strengths

The SEA conducted a statewide survey of all stakeholders to better understand which aspects of ESEA were their highest priorities for change. The SEA had multiple meetings with the two State teacher associations to review drafts the request and the State made adjustments to the request based their feedback; Massachusetts started their engagement before the waiver was announced and leveraged RTT communication channels. The State established a website to collect comments.

*Weaknesses,
issues, lack of
clarity
Technical
Assistance
Suggestions*

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

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

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

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

CONSULTATION QUESTION 2 PANEL RESPONSE

Tally of Peer Responses:

3 Yes

4 No

Panelists acknowledge that time was short and that the SEA clearly made an effort to engage multiple constituencies. However, members of the panel questioned whether or not stakeholders had an opportunity to provide feedback on key items in the waiver, such as, did parents have an opportunity to comment on the decision to no longer offer school choice.

Strengths

Waiver request and footnotes suggest that the SEA met with many stakeholder groups including: statewide associations, parents, vocational schools, and the State's urban superintendent network. The State also met with advocacy groups for ELLs and SWDs, philanthropic and nonprofit organizations.

*Weaknesses,
issues, lack of
clarity*

Modifications to the waiver request do not seem to be based on responses of groups other than educators, although application says the feedback across groups was —remarkably consistent.||

Not clear that those most invested in SWD, ELL and other underserved groups had a full chance to understand the implications of waiver and air their views.

In call with staff from Massachusetts the panel asked them to provide more clarity on who was consulted and whether the specific hard questions were asked and answered by relevant groups. Panel did not receive a clear answer about whether State asked stakeholders about several of the most difficult issues—loss of school choice--even in priority schools, and about the change to no consequences for schools with large individual sub-group gaps.

The panel is unclear about the engagement of Massachusetts' diverse communities especially racial and ethnic minorities where the gaps most significant. Unclear about the input and commitment of all relevant stakeholders.

*Technical
Assistance
Suggestions*

Note to Peers: Staff will review Questions 1 and 3

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

OVERVIEW QUESTION 2 PANEL RESPONSE

Tally of Peer Responses:

Rationale The SEA provided a comprehensive approach for implementing the waiver principles. Furthermore, the State’s long history of setting and maintaining high standards and expectations for all students is a strong indication that the SEA will achieve the ambitious goals that are identified.

7 Yes

0 No

Strengths

State has high learning standards in US as validated by NAEP results consistently and most recently in 2011. Their application justifiably points to this track record and helps make their application coherent. Panel noted that the State has strong outside groups to —hold their feet to the fire|| and significant internal competence. Some schools have already cut proficiency gaps in half which helps make it realistic to believe they will do so again as they promise. State has a clear and precise vision and goals for the State and a whole-school reform approach to turning around schools and supporting districts. It is also helpful that several pieces of legislation underpin their past and current reform approach—for example the —2010 achievement gap act|| as well as RTT.

*Weaknesses,
issues, lack of
clarity
Technical
Assistance
Suggestions*

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

1.B Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013 English language learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

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

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

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

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

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

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

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

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

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

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

- incoming teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new college- and career-ready standards; and
- incoming principals to provide strong, supportive instructional leadership on teaching to the new standards?

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

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

- Raising the State's academic achievement standards on its current assessments to ensure that the adjusted achievement standards reflect a level of postsecondary readiness, or are being increased over time to that level of rigor (e.g., the SEA might compare current achievement standards to a measure of postsecondary readiness by back-mapping from college entrance requirements or remediation rates, analyzing the relationship between proficient scores on the State assessments and the ACT

- or SAT scores accepted by most of the State's 4-year public IHEs, or conducting NAEP mapping studies)?
- *Augmenting or revising current State assessments by adding questions, removing questions, or varying formats in order to better align those assessments with college- and career-ready standards?*
 - *Implementing another strategy to increase the rigor of current assessments, such as using the "advanced" performance level on State assessments instead of the "proficient" performance level as the goal for individual student performance?*
 - *Is this activity likely to result in an increase in the rigor of the assessments and their alignment with college- and career-ready standards?*

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

1.B PANEL RESPONSE

Tally of Peer Rationale Responses:

7 Yes

0 No

The SEA provides a realistic and high quality 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. It is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards.

Strengths

- Massachusetts did a thorough analysis of current standards compared to Common Core standards.
- They have joined WIDA, and plan to use aligned WIDA assessment in 2013.
- The SEA described accommodation policies and tiered instructional staff strategies.
- Professional development for teachers provided in multiple modes and channels. Panel wants to commend Massachusetts especially on the strength of work on State-developed (or multi-State) curriculum units and other high quality resources and concrete information for teachers.
- As for higher education institutions, Panel notes Massachusetts' historic relatively high bar for teacher certification. Also application suggests there are plans for new IHE program requirements in 2012 to account for Common Core State standards.
- Massachusetts is a governing State in PARCC but carefully notes that will only formally commit to new PARCC assessments when they know PARCC is more rigorous than current Massachusetts system.

Weaknesses, issues, lack of clarity

The request does not detail professional development and supports for principals/instructional leadership roles. For principals, the panel does not see much on preparation or IHE involvement.

Technical Assistance Suggestions

Immediately include principals in activities to build their understanding and ability to help implement the Common Core standards and aligned assessments. Ensure through the principal evaluation system that they have capacity to lead this important work.

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 piloted in all LEAs no later than the 2014 2015 school year and piloted in all LEAs no later than the 2014 2015 school year? 2015 school year? Do the plan include setting academic achievement standards? 2015 school year? Do 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 annual administration in all LEAs beginning no later than the 2014 2015 school year? Do the plan include setting academic achievement standards? 2015 school year? Do the plan include setting academic achievement standards?

1.C, OPTION B PANEL RESPONSE

Tally of Peer Responses: Rationale Not applicable because the SEA selected option A.

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not applicable because the SEA selected 1.C, Option A or Option C

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:*

7 Yes

0 No

The panel agrees that the application presents a high quality plan for transitioning to college and career-ready standards and administering annual, statewide, aligned high-quality assessments that measure student growth that are comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement.

Strengths

This is a State coming from high historic standards. Massachusetts is leader in PARCC and belongs to WIDA and NCSC. The State has added Pre-K standards which show additional level of commitment to high standards. Application has hit all the required elements and the SEA demonstrated their commitment and support of other policymakers. Focus on instructional materials is comprehensive.

*Weaknesses,
issues, lack of
clarity*

Insufficient focus on principal involvement with transition to standards. Peers not persuaded that plans for IHEs around standards transition will lead to desired outcomes.

*Technical
Assistance
Suggestions*

Ensure that principals are fully included in the capacity building around Common Core standards through professional development as well as their own evaluation system. Massachusetts' engagement with IHEs' prep programs could use more focus, again especially around principal preparation.

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, and, if so, is it likely to improve student achievement and the quality of instruction for students?

2.A.i PANEL RESPONSE

Tally of Peer Responses: *Rationale*

 4 *Yes*

 3 *No*

Panel found that the SEA has proposed a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012 2013 school year, and, if so, is it likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students. The panel’s main concern is that, with the shift to the —high needs|| group as a main driver of classification, there is no protection—beyond public reporting—for multiple years of non-performance on goals for individual ESEA subgroups.

Strengths

The academic indicators included are sound and exceed minimum requirements. Though the system is more complicated than some, the panel appreciates the inclusion of metrics focused on increasing the number of students—including subgroups of students—reaching the advanced level, as well as decreasing numbers at the lowest level.

Panel approves of the plan to include four years of data, with the most recent counting the most because this ensures that schools are classified and re-classified based on real, sustained results, rather than statistical flukes.

The State’s decision to categorize a District/LEA at the level of its lowest performing school is courageous and potentially very promising for focusing SEA capacity on LEAs most in need of support, and for helping LEAs focus on the schools most in need of support.

Differentiated recognition, accountability and support are well documented and already underway with many of the priority schools. The framework for district and school improvement is thoughtful and comprehensive.

Timeline appears realistic because implementation of most features is well underway.

Weaknesses, issues, lack of clarity

The panel’s main concern is that, with the shift to the —high needs|| group as a main driver of classification, there is no protection—beyond public reporting—for multiple years of non-performance on goals for individual subgroups.

There is some division on the panel about the complexity of the metrics in the classification system. Some think that, because of the complexity of the system, together with a set of exit criteria that differ from the main targets, this system is not superior to the current system. Others support use of a complex index that captures a wider range of indicators, as long as the display/reporting of the school —score card|| makes the pieces clear and transparent. Both groups, however, worry about the decision to use exit criteria for the bottom two categories that differ from simply hitting targets on the main goal metrics for several years running

There is some concern on the panel that, given the complexity of the metrics, schools, educators and parents will not easily understand what it takes to get into or out of any one school category. Clearly, considerable effort will be required to help educators and others understand.

Also, panel is not clear if all the U.S. Department of Education (USED) —must|| requirements for identification of Reward and priority schools have been met, but USED is supposed to assess this, not the panel. We note for the record that it appears it may be possible that schools could be recognized as Reward schools with either high proficiency or high growth but with achievement gaps that continue to widen. There also appears to be a clerical error in description of Reward schools based on closing of performance gaps because it does not differ from description of pathway to Reward school above.

*Technical
Assistance
Suggestions*

In places, especially exit criteria, metrics seem needlessly complex because they differ from the sophisticated AMOs and accountability calculations used in rest of system.

Panel thinks N size for subgroups should be reduced to 30 at most, bringing the State in line with practice in most States.

Panel believes that, to meet the requirements of this principle, the State should be asked to add safeguards to assure that multiple years of poor performance for a single subgroup triggers action, even if the larger —high needs|| group as a whole is making required progress.

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:

Rationale

System provides differentiated recognition, accountability and support for LEAs and schools based on required measures of ELA/Math student achievement, graduation rates and school performance and progress over time.

_7__ Yes

_0__ No

Strengths

The SEA proposes to adapt the current system in place and it includes the three measures.

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

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

2.A.i.b PANEL RESPONSE

*Tally of Peer
Responses:*

Rationale The panel feels relatively confident that the State is providing incentives and support for improving results in the high-needs super subgroup. However, the panel is not confident that there are yet sufficient safeguards in place to ensure that all subgroups participate in those gains.

0 Yes

7 No

Strengths

The creation of a new —high needs|| super group has one significant benefit: that 200 schools not currently accountable for subgroups because of n sizes will be included. State leaders also believe that, because it will —eliminate double and triple counting|| system will be perceived as fairer. State argues that, because the vast majority of students in the traditional subgroups are included in the new group, the benefits of this approach outweigh its potential downsides.

*Weaknesses, issues,
lack of clarity*

No safeguards—beyond simple public reporting-- to ensure action when one or two individual subgroups languish, even when the overall high needs group moves forward.

*Technical
Assistance
Suggestions*

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

2.A.i.c PANEL RESPONSE

Tally of Peer Rationale
Responses:

The Panel believes that the State’s system of interventions is comprehensive and includes high quality interventions specifically focused on improving the performance of English Learners and students with disabilities.

7 Yes

0 No

Strengths

Panel notes many references in intervention plans to specific needs of ELL and students with disabilities. Plans contain research-based, credible interventions for both groups.

*Weaknesses, issues,
lack of clarity
Technical Assistance
Suggestions*

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

2.A.i.d PANEL RESPONSE

Tally of Peer Responses:

Rationale

As implementation of parts of this system is already well underway, there should be no problem with full implementation by 2012-13.

 7 *Yes*

 0 *No*

Strengths

- Enabling legislation passed in 2010.
- Implementation of many pieces already underway.
- Earlier —priority-like|| schools are already showing improved MCAS results.
- All currently identified priority schools will have plans underway for 2012-13 and State plans to identify several more schools.

Weaknesses, issues, lack of clarity

Technical Assistance

Suggestions

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

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

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

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

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

2.A.ii (INCLUDING QUESTIONS a AND b) PANEL RESPONSE

Tally of Peer Responses: *Rationale* The State chose to include science, gave an appropriate rationale, and provided required data.

Responses:

7 Yes

0 No

Strengths

Adding science broadens academic focus beyond ELA and Math, and helps to make sure students are college ready. Large gaps in Science demonstrate the need to do this.

Weaknesses, issues, lack of clarity

Technical Assistance

Suggestions

Not applicable because the SEA selected 2.A, Option A

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

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language

arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts?

If the SEA selected Option C:

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

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

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

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

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

2011 school year

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

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

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

2.B AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE

Tally of Peer Responses: Rationale The State provided clear information on how it will set meaningful AMOs for LEAs, schools and subgroups.

__7__ Yes

_0__ No

Strengths AMO approach is basically a modified Option A. Panel approves of including a focus on improving, advanced student percentages and reducing percentage of lowest achieving students.

Proposal for AMOs appears to include all of the USED requirements.

Massachusetts has set required achievement-related AMOs and more, including additional subjects and high school dropout rate. The State is also using growth in an allowable way and setting targets around it. This gives Massachusetts 11 AMOs for high schools and 9 for elementary and middle schools. They are reporting results for these AMOs for all traditional subgroups, plus the —high need|| subgroup. Results for high needs group and for all students will be used for classifying schools.

Weaknesses,
issues, lack of
clarity

Technical
Assistance
Suggestions

Not applicable because the SEA selected 2.B, Option A or Option B

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

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

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

2.C.iii PANEL RESPONSE

Tally of Peer Responses: Rationale The State described how it will recognize its reward or —commendation|| schools.

7 Yes

0 No

Strengths	Reward schools will receive public recognition and be honored at a state event. Leaders will be asked to share their strongest practices, and serve as a resource to other schools and in regional learning communities. Schools may be eligible to apply for promising practice grants to help document their best practices.
Weaknesses, issues, lack of clarity	Waiver request was not clear on the requirement to assure that commendation schools had at least a 95 percent participation rate in state assessments. In follow up phone call, State officials indicated that a 95 percent requirement would be enforced. Note to ED please follow-up on written response. We note for ED follow up two potential problems. First, contrary to the requirements of the waiver regulations, it appears to be possible that schools commended for either high proficiency or high progress could have gaps that are not narrowing. Checks here seemed insufficient to meet the waiver requirements. Second, there appears to be an error in description of Reward schools based on closing performance gaps because that description does not differ from description of pathway to Reward school on simple progress. (Department of Education staff to review 2Ci and ii).
Technical Assistance Suggestions	

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: *Rationale*

7 Yes

0 No

The interventions proposed by Massachusetts are aligned with the turnaround principles. Not only are they promising, but they have already delivered improvements in two thirds of the original —priority|| like schools.

Strengths

The State’s proposal includes a comprehensive set of actions, (including a nice explanatory chart) that are aligned with turnaround principles. Panel is impressed by comprehensive diagnostic tools for schools and districts. The same diagnostics are used at all levels of performance and they enable improvement plans that are highly responsive to specific school needs.

SEA’s role differs by level of performance of a school or a district. The State is more intrusive in level 4/5 schools and LEA’s about how the tools are used and what interventions are selected.

Family and community engagement actions are explicitly addressed.

Instead of simply focusing on the lowest performing schools, the proposal addresses head on the district-level conditions for school effectiveness. These are the subject of diagnosis and action, and some of the intervention work and resources go toward addressing issues at district level that are barriers to improvement in individual schools.

Massachusetts has a track record of intervening in the lowest-performing schools and has systems already in place to support these interventions (bottom of p. 49 – substantial achievement shown in level 4 schools after past year of interventions). Regional support structure is strong and support of LEA capacity is clear. State has strong hands-on involvement in lowest performing schools and districts.

Weaknesses, issues, lack of clarity

Application is less than clear about staffing and staffing authority in priority schools. The panel would have liked to see more linkage to principle 3: how evaluations and hiring fit into philosophy of turnaround schools. The appendix with school redesign plan details reassured the panel somewhat that weak principals can be removed, stronger teachers hired. However, it is not clear that principals have authority to remove weak teachers, especially where there are unusual concentrations of such teachers.

While there appears to be considerable hands-on assistance from state to LEA officials, the state’s monitoring process for assuring that plans are carried out was not clearly detailed.

Technical Assistance Suggestions

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

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

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

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

2.D.iii.b (INCLUDING QUESTIONS (i)-(iii)) PANEL RESPONSE

Tally of Peer Responses:

Rationale

The interventions proposed by Massachusetts are aligned with the turnaround principles. Not only are they promising, but they have already delivered improvements in two thirds of the original —priority|| like schools.

__7_ Yes

0 No

Strengths

Information provided about tiered systems of support that suggest thought about the subgroups.

Weaknesses, issues, lack of clarity

The panel believes that subgroups were mentioned in a generic manner in terms of interventions. State is also less than clear about authority that principals have to move out weak teachers.

Technical Assistance Suggestions

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

2.D.iii.c PANEL RESPONSE

Tally of Peer Responses:

Rationale

State has fully met this requirement.

7 Yes

0 No

Strengths

State law that mandates the interventions. Plans last three years, but State can require additional years even if metrics improve to level where school would exit priority status.

Weaknesses, issues, lack of clarity

Technical Assistance

Suggestions

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

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

2.D.iv PANEL RESPONSE

Tally of Peer Responses:

The State’s proposed timeline for assuring meaningful interventions in priority schools fully meets federal timeline requirements.

 7 Yes

 0 No

Strengths

Thirty-three (33) schools are already making or implementing plans. State will add 6 more schools at the end of this year. Two-thirds of schools that are currently fully implementing have started to make gains.

Weaknesses, issues, lack of clarity

Technical Assistance

Suggestions

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

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

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

2.D.v and 2.D.v.a PANEL RESPONSE

Tally of Peer Responses: *Rationale* The State's criteria for exiting priority status assure that schools have made significant progress.

Responses:

7 Yes

0 No

Strengths The bar set by the state is thoughtful and challenging.

Weaknesses, issues, lack of clarity The Panel is puzzled why the State has not chosen to use multiple years of solid performance on its own PPI/AMOs as exit criteria. Why have good goals and then not use them for much?

Technical Assistance Clearly explaining rationale for exit criteria would be helpful.

Suggestions

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

2.E.i PANEL RESPONSE

*Tally of Peer
Responses:*

Rationale

The SEA described a methodology that more than meets the Federal requirement for a number of schools equal to at least 10 percent of Title I schools.

7 Yes

0 No

Strengths

State requirement is 20% of all schools, equal to more than the required level of 10%.

*Weaknesses, issues, lack
of clarity*

Technical Assistance

Suggestions

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

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

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

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

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

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

2.E.ii (INCLUDING QUESTIONS a-c) PANEL RESPONSE

Tally of Peer Responses:

Rationale

The State’s methodology for identifying focus schools meets Federal requirements to focus on large gaps or low subgroup performance.

7 Yes

0 No

Strengths

SEA will include schools with low graduation rates, low performance from individual subgroups, and low overall performance.

Weaknesses, issues, lack of clarity

Technical Assistance

Suggestions

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

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

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

2.E.iii PANEL RESPONSE

*Tally of Peer
Responses:*

The same comprehensive diagnostic tools and planning process with interventions described in priority schools extends to Focus Schools and Focus Districts, though with somewhat lighter touch from SEA.

7 Yes

0 No

Strengths

As with improvement efforts for Priority Schools, State's process encompasses both the school itself and the conditions in the LEA that may have contributed to its performance problems.

Focus schools and their LEAs will use the same framework and process as those with Priority status, but in a manner more targeted on the specific issues that led to Focus status.

LEAs with focus schools will receive hands-on support from both the SEA and regional support centers.

LEAs will be required to set aside resources to fund interventions, but on a sliding scale proportionate to need.

Process does address the different types of school needs.

SEA has strong process to pre-approve partners to support districts with interventions.

Timeline requirements met.

Evaluation model to document and disseminate promising practices is also a strength. Item 2 on page 55 presents State's tiered system of support well.

Weaknesses, issues, lack of clarity

*Technical
Assistance
Suggestions*

Language about SEA review of plans from Focus districts/schools is unclear about whether SEA must actually approve those plans. At least some members of the panel believe that, if it doesn't have a formal approval process, the SEA should consider adding one to help assure that districts are held accountable for implementing the plans.

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

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

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

2.E.iv and 2.E.iv.a PANEL RESPONSE

*Tally of Peer
Responses:*

 0 *Yes*

 7 *No*

The Panel is not convinced that the SEA's exit criteria for schools with Focus status assures that those schools have made significant progress in improving achievement and narrowing gaps. It appears to panel that schools near the cut point for Focus status could essentially —float|| out of Focus status based more on mathematical accident or slipping performance in other schools than on real, sustained progress in the Focus school.

Strengths

As with rest of classification system, 4 years of data are used in the calculation.

*Weaknesses,
issues, lack of
clarity*

Exit criteria are silent on meeting targets for the group or groups whose performance landed the school in Focus status to begin with.

*Technical
Assistance
Suggestions*

Why aren't the targets in the State's very strong accountability system used for exiting schools from Focus school status? SEA should consider using sustained progress in meeting those goals as a criterion for exiting Focus status.

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

2.F PANEL RESPONSE

Tally of Peer Rationale
Responses:

Though there is much to admire about the SEA’s differentiated recognition, accountability and support system, the Panel is not convinced that schools in the Level 2 category—presumably the largest category of schools, at least initially—have sufficient incentives to improve achievement and narrow gaps.

 0 *Yes*

 7 *No*

Strengths

Use of 4 years of data in ratings should produce stability. Very strong set of incentives and supports for Levels 3, 4 and 5 schools.

Same diagnostic tools, improvement framework, regional support centers and best practices are also available to other schools, including Level 1 and Level 2 Title 1 schools

Schools in Level 1 will have reasonably strong incentives to meet their overall and high needs super group PPI targets to keep what presumably are coveted Level 1 ratings.

Weaknesses, issues, lack of clarity

It seems likely that, at least initially, Level 2 will encompass the largest number of MA schools. The Panel is concerned that without differentiating levels within this category in ways apparently not currently contemplated by the SEA, the incentives for these schools to aggressively attack performance problems in all groups of students may be too weak. For example:

Given that there are at least three levels below Level 2, will such status feel —ok|| for most of the schools so classified? Kind of like a —B||?

While the use of four years of data in the rating should produce stability and confidence, this could also serve to undermine the confidence of educators in the school in their ability to meet targets by limiting the effect of even two years of strong gains?

Most worrisome of all, since the performance of individual ESEA subgroups does not —count|| for anything beyond public reporting, is it likely that schools will focus on improving results for the

groups within the high needs super group that educators feel are —easier|| to move, leaving the —harder|| groups behind--and with no consequences?

This latter problem, in particular, seems to violate the Federal requirement that subgroup AMOs be used to provide incentives and support to schools that are not Priority or Focus.

If Level 1 and 2 schools have only very weak incentives to attack the conditions that cause performance problems with any and all of their subgroups—and if these schools are the majority of schools in the State--how will the State meet its own goals to cut all gaps to proficiency in half?

State should consider using its AMO goals and outcomes to differentiate among Level 2 schools.

State should establish a safeguard to assure attention and action when one or more subgroups are —stuck||, even though PPIs are improving for the —high needs|| group.

*Technical
Assistance
Suggestions*

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

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

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

2.G.i PANEL RESPONSE

Tally of Peer Responses:

3 Yes

4 No

While the Peers find much to admire about the SEA's framework for building LEA and school capacity, the details in the application are insufficient to give the Panel full confidence that the process will actually succeed in building capacity.

Strengths

Many peers like the tiered process for District support as elaborated on in other questions above. Massachusetts has a set of strategies that are cohesive and differentiated and have begun to generate results in first priority schools including:

- District standards and indicators
- Conditions for School Effectiveness
- DSACs
- Annual selfevaluation

For the focus and priority schools, the SEA has built strong systems.

Network of urban schools/districts that work as a community of practice is a strength that helps the SEA utilize its capacity in targeted way to support LEAs.

*Weaknesses, issues,
lack of clarity*

The panels have concerns that schools with high ELL populations may not be getting the needed interventions.

Some Peers find this plan less than clear about the monitoring structure to ensure progress on milestones in implementation plans in level 3-5 schools and districts.

While it seems clear that the SEA has organized itself for hands-on involvement with LEAs, What data are being collected and what oversight of work-in-process does the State provide? Who triggers the intervention

appropriate for the particular need after an initial plan is approved? Application contains the skeleton of a plan, but not an actual plan.

*Technical Assistance
Suggestions*

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

2.G.ii PANEL RESPONSE

Tally of Peer Responses:

Rationale

The SEA’s process for supporting and holding their LEA accountable seems likely to improve their capacity to support school improvement.

7 Yes

0 No

Strengths

Page 71 shows the State has a detailed process, with internal and external reviewers, for choosing external partners.

Districts rated at the level of their lowest performing school.

Rather elaborate support structure for LEAs

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

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

2.G.iii PANEL RESPONSE

Tally of Peer Responses:	Rationale	Application documents a sound system of tiered supports and required set asides scaled to the depth and breadth of the problem.
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 7 Yes

 0 No

Strengths	Diagnostic tools help schools and districts plan targeted ways to utilize funds given their situations.
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Scaled set-asides to finance interventions are provided.

Weaknesses, issues, lack of clarity	SEA has budget oversight
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Technical Assistance
Suggestions

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: *Rationale*

While MA has created a robust accountability structure—with clear and ambitious goals for all LEAs, schools and subgroups—the system as a whole does not make full enough use of its own goal metrics to drive and support improvements for all groups of students.

 0 *Yes*

 7 *No*

Strengths

Massachusetts has set very ambitious goals—to reduce by half the number of students in every one of its student groups not meeting the State’s rigorous definition of proficiency. In meeting these goals, the State will also reduce by half the gaps between different groups of students. Moreover, the State has gone even further, elaborating goals to increase the number of students from every group reaching the advanced level of performance, as well as to significantly decrease the numbers at the lowest level of performance. These are indeed a powerful set of goals.

The State is also a high capacity State, whose educators have long experience teaching to rigorous standards, and has also built, over time, a robust system of supports for LEAs and schools. The SEA itself is very involved with its districts, especially those with low performing schools. But it has also built a very strong regional system of supports, including focused learning communities among its LEAs and schools.

In an effort to ensure that more schools are working on the performance of high needs kids the State has created a high needs subgroup to supplement the goals it has set for ESEA subgroups. (However there are some weaknesses to their approach that need to be corrected).

Weaknesses, issues, lack of clarity

The Panel is concerned, however, that State leaders may have undermined their likelihood of reaching their statewide, LEA, school and sub-group goals by weighing progress against them too little—indeed, sometimes not at all—in the actual operation of their accountability and supports system. Our fear is that, in doing so, at least some goals—for example, reducing by half the gap between current levels of proficiency among African Americans and 100%--will become rhetorical goals only (think National Education Goals), because nobody has to manage against them. And while we understand the advantages of the —high needs group||, we know from experience that school-level educators may look to see which among these groups they can move most easily, leaving some of the conditions that produce low achievement among other groups unaddressed for many years.

*Technical
Assistance
Suggestions*

The panel believes these imperfections are critical, but fixable with relative ease. Three changes would both vastly improve this system, and bring it into conformance with the basic requirements laid out for this waiver—that the plan promise to improve achievement and close gaps for all groups of students.

1. Making sure exit criteria (from Level 3 and 4 status) include meeting PPI goals;
2. Adding to the new system a safeguard that would ensure attention and action when an individual subgroup in the school is not meeting goals, even if the school is making progress on its PPI.
3. Reduce N size to no more than 30, which will bring MA into line with most States and increasing transparency around group performance.

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

If the SEA selected Option A:

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

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

3.A.i, OPTION A.i PANEL RESPONSE

Tally of Peer Responses: Rationale

Not applicable; SEA chose Option C

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not applicable because the SEA selection 3.A, Option B or Option C

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

3.A.i, OPTION A.ii PANEL RESPONSE

Tally of Peer Responses: Rationale

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option B or Option C

Note to Peers: Staff will review iii.

If the SEA selected Option B:

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

Note to Peers: Staff will review i and iii.

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

3.A.i, OPTION B.ii PANEL RESPONSE

Tally of Peer Responses: Rationale

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option A or Option C

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

3.A.i OPTION B.iv PANEL RESPONSE

Tally of Peer Responses: Rationale

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option A or Option C

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

3.A.i OPTION B.v PANEL RESPONSE

Tally of Peer Responses: Rationale

___ *Yes*

___ *No*

Strengths

Weaknesses, issues, lack of clarity

Technical Assistance Suggestions

Not Applicable because the SEA selected 3.A, Option A or Option C

If the SEA selected Option C:

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

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

3.A.i, OPTION C.i PANEL RESPONSE

Tally of Peer Responses:

Massachusetts' request seems like a significant advance over their current evaluation system and is likely to increase the quality of instruction for students and improve student achievement. The Panel noted some critical weaknesses.

 4 Yes

 3 No

Strengths

Massachusetts has designed a system that uses multiple measures of student learning and educator practice with clear linkage to feedback, educator development with differentiated development plans, and impact on personnel decisions. The State has taken important steps toward ensuring that all measures used in evaluations will be reliable and valid. Given the policy and political context in the State, the choices the State has made are understandable and sound educationally and technically.

Weaknesses, issues, lack of clarity

Under the Massachusetts system, there are too many opportunities for the evidence of educator impact on student learning to be ignored in determining rewards, development needs and consequences for educators. If this occurs, the State will be left with a system that does not meaningfully differentiate performance in ways that align with student learning.

The request also does not explain enough about how educators will be held accountable for advancing learning of ELLs and SWDs

Finally, the lack of a plan for evaluator training and ensuring inter-rater reliability or for other critical steps in State-wide implementation of the system is a serious concern for the panel.

Technical Assistance Suggestions

Provide a detailed, written plan for implementation, especially around evaluator training and ensuring inter-rater reliability, rather than what is included in the application and appendices.

Consider how to highlight needs of ELLs and SWDs in educator practice standards and ensure educators of these students are held accountable for these students in student learning and practice measures.

Not applicable because the SEA selected 3.A, Option A or Option B

Note to Peers: Staff will review ii.

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

3.A.i OPTION C.iii PANEL RESPONSE

Tally of Peer Responses: *Rationale* Peers agreed there was sufficient involvement of teachers and principals in the development of guidelines.

7 Yes

0 No

Strengths State formed a 40 member task force and worked with them for almost a year to create recommendations that subsequently led to draft regulations, public comment period and regulation adoption. The state also conducted a survey of educators that showed broad consensus that the old system did not work along with general agreement to goals of new system.

Weaknesses, issues, lack of clarity All of the LEAs who signed off on the Race to the Top application supported evaluation system.
There are large numbers of people providing input, but unclear whether teachers and principals working with high-needs populations were represented in those comments.

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option A or Option B

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

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

a. Will be used for continual improvement of instruction?

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

3.A.ii.a PANEL RESPONSE

Tally of Peer Responses: Rationale

6 Yes

Emphasis in design and communication around the Massachusetts system is clearly on improvement of instructional practice although application does not provide many specifics about State-provided tools or resources that could support teacher development.

1 No

Strengths

Strength seen in that all educators have a development plan, and plans are differentiated based on educator performance.

There is a proposed model system (pp. 81-82) with a statewide practice rubric, webinars, website as central repository.

Weaknesses, issues, lack of clarity

What guidance has the SEA given to LEAs to help teachers improve their practice? The request is light on specific supports for development.

Technical Assistance Suggestions

Could refer to very substantial support provided under Common Core and data-driven instruction in Principle 1.

Not applicable because the SEA selected 3.A, Option C

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

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

3.A.ii.b PANEL RESPONSE

Tally of Peer Rationale
Responses:

Peers are concerned that objective evidence of student learning does not play enough of a role to ensure that educator ratings will be meaningfully differentiating educators who have made significantly different contributions to student growth.

0 Yes

7 No

Strengths

The State has 4 levels of practice rating and, separately, three levels for student learning. Disparities in practice vs. student learning ratings require evaluator's supervisor review. High performance/low growth leads to a more prescriptive one year teacher development plan than would occur for high performance/middle to high growth.

*Weaknesses,
issues, lack of
clarity*

There is concern that growth has minimal impact on interventions and consequences. Furthermore, there are too many opportunities for districts to ignore the growth information – the plan does not appear to have sufficient safeguards.

The State does not appear to have contemplated the situation of a teacher with low performance/high growth and whether that should change the consequences for a teacher. Or on whether this circumstance calls into question the skill of the evaluator, especially if it is a repetitive pattern.

Limited information on evaluation system for principals was provided.

*Technical
Assistance
Suggestions*

The State should collect data to analyze the relationship between performance and growth data, and identify outlier districts and schools.

State could consider ensuring that in cases where growth data is much more positive than practice data, the growth data benefits teachers in a way that is parallel to how growth impacts teachers in the reverse situation (high performance/low growth).

Not applicable because the SEA selected 3.A, Option C

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

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

3.A.ii.c and 3.A.ii.c(i) PANEL RESPONSE

Tally of Peer Responses:

0 Yes

7 No

The Panel did not see high quality plans for ensuring evaluator training and inter-rater reliability. The Panel was also concerned about the lack of explicit reference to how student growth of ELLs and SWD will be measured for all teachers of these students. The Panel felt the teacher and leader standards do not explicitly cover practices that are required to ensure all students including ELLs, SWDs, succeed.

Strengths

Clearly utilizes multiple measures, both State-provided and district-level growth. There is a model statewide rubric which will encourage districts to adopt it instead of seeking approval for an alternative. State will provide State guidance for district-determined measures of growth. State will also provide guidance around comparable growth measures in subjects without State-provided growth measures, and these measures will take full effect after two years of use/validation.

Reference in regulations to measuring growth for ELLs using English language proficiency test in addition to MCAS.

Weaknesses, issues, lack of clarity

The State did not provide a plan for inter-rater reliability, evaluator training, or monitoring.

The State has not specified how growth will be measured for students with severe disabilities who would be covered by MCAS-alt.

Standards of practice, especially in the educating all students standard, are somewhat vague about specific needs of SWDs and ELLs (35.03 and 35.04).

Application does not specify how teachers who are not full-time classroom teachers but provide instructional services to ELLs or SWDs will be included in evaluation.

*Technical
Assistance
Suggestions*

State should have a more detailed plan for the rollout of their system. State should elaborate how data linkages and teacher-of-record policies lead to inclusion of ELLs and students with disabilities in teacher evaluation, and how the rubrics and evaluator training will include awareness of pedagogical best-practices in

teaching ELLs, SWDs.

Not applicable because the SEA selected 3.A, Option C

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

3.A.ii.c(ii) PANEL RESPONSE

Tally of Peer Responses:

Rationale Massachusetts will provide State-wide measures of student growth in the grades and subjects required to be assessed at the State level, for use in evaluations of educators

__7__ *Yes*

__0__ *No*

Strengths

They have a statewide model and framework for these required subjects, with planned implementation in June 2012. State requires an additional district-selected measure, in addition to State measure, for which the State will provide guidance.

Weaknesses, issues, lack of clarity

Peers note that achievement-only accountability systems run the risk of creating disincentives for educators to serve higher needs student populations. Using growth measures in educator evaluation should mitigate these disincentives while providing objective measures of educator impact of student learning. Peers are not convinced that the SGP model planned for Massachusetts has been analyzed to ensure it mitigates unintended disincentives to serve higher needs students. Do educators in high poverty schools/classrooms or those with higher populations of students with disabilities have a similar chance to earn high growth scores compared to teachers with lower needs students? If not, is the State convinced that the difference is entirely due to difference in educator effectiveness?

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option C

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

3.A.ii.c(iii) PANEL RESPONSE

Tally of Peer Responses: *Rationale* The State has a plan and is phasing in these measures gradually.

Responses:

7 Yes *Strengths* The State has a plan for guidance by June 2012, with measures taking effect two years later. There is guidance for both the district measure and the additional measure. Creating guidelines and evaluating district plans.

0 No *Weaknesses, issues, lack of clarity*

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option C

d. Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE

Tally of Peer Responses: *Rationale* The Panel accepts that the evaluation schedule in Massachusetts is a rational way to direct evaluation resources although some would prefer annual summative evaluations for all teachers

7 *Yes*

0 *No*

Strengths Regulations (Sec 35.06), specify that evaluations must occur annually for probationary teachers and lower-rated professional-status teachers. Summative evaluations happen every two years for professional teachers with a proficient or higher rating and whose impact on student learning is moderate or high, although formative observation and feedback is supposed to happen in off-years.

Weaknesses, issues, lack of clarity Regulations imply that cycle for principals is the same as for teachers, but the panel was a bit unclear on this

Technical Assistance Suggestions

Not applicable because the SEA selected 3.A, Option C

e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?

Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?

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

3.A.ii.e PANEL RESPONSE

Tally of Peer Responses: *Rationale* Most peers agree that the system is designed to ensure timely and meaningful feedback to educators.

6 Yes

1 No

Strengths

All educators have a development plan at all time, and there is differentiation in the nature of the plans. The evaluation cycle and the development plans themselves build in regular feedback (section 35.06 in regulations). Also, student, parent and teacher feedback will play a role in applicable educator evaluations.

Weaknesses, issues, lack of clarity

Technical

Assistance

Suggestions

Unclear about the professional development supports; much is at the district level and unclear how Massachusetts will oversee this process.

State should set in place mechanisms to collect data and survey teachers periodically on whether they are getting meaningful feedback and supports needed to develop (Massachusetts did such a survey as part of initial engagement which could serve as a baseline)

Massachusetts could also do follow-up evaluations with the pilot sites.

Not applicable because the SEA selected 3.A, Option C

f. Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE

Tally of Peer Responses: *Rationale* Evaluation results will inform personnel decisions.

7 Yes

0 No

Strengths

There are multiple places in the regulations that refer to impact of evaluations ratings, both performance and growth, on personnel decisions. In the regulations they outline incentives for teachers, compensation and professional growth ladders, as well as repercussions that include change of professional status and dismissal (per statute 71.38)

*Weaknesses,
issues, lack of
clarity
Technical
Assistance
Suggestions*

Not applicable because the SEA selected 3.A, Option C

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

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

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

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

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

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

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

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

3.B PANEL RESPONSE

Tally of Peer Responses:

Rationale

Majority the panel credits the State for doing what it can to ensure high quality implementation across the State. The lack of specific, high quality plans for the many next steps is a concern, however.

6 Yes

1 No

Strengths

The fact that evaluation is embedded in statute and regulation as well as supported through Race to the Top is important to ensuring implementation.

SEA requires 2011-2012 evaluation implementation in Level 4 schools and has —early adopter|| commitment from several districts for 11-12. This is underway now. Race to the Top districts committed in RT3 to implement in 12-13 and rest of State expected to implement in 13-14. Peers think this phase-in timeline is rational.

In 2012-2013, many districts committed to implement under RT3

The SEA will have a Model system with measures it has selected/vetted and SEA reviews local plans and measures as a check on their rigor and validity

The fact that implementation is subject to collective bargaining ensures educator involvement.

Have rubrics for standards, rollout timeline, working with AIR for pilot support.

Weaknesses, issues, lack of clarity

Collective bargaining may lead to inconsistent implementation. State regulation says that certain characteristics must be met in evaluation system, but it is possible that these requirements could be softened under collective bargaining agreement.

No indication that Massachusetts is including children taking the alternate assessment (or their teachers)

The panel did not see plan for monitoring a sample of districts for fidelity and rigor of implementation.

Also not clear on the details of State plan for its steps in ensuring high quality, consistent implementation.

Technical Assistance Suggestions

Provide a detailed written plan for State steps in implementation and ongoing monitoring of implementation.

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

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses:

Rationale

A majority of panel agrees that the application supports principle 3 requirements due to the strengths described below and in other questions.

5 Yes

Of the weaknesses, the most troubling are the lack of specific plans for future implementation steps including evaluator training, gaps in the role of growth measures and issues around assessing growth and practice for teachers with ELLs and SWDs.

2 No

Strengths

- Four levels of practice rating/ 3 for student learning impact.
- Multiple measures.
- Differentiated educator development plans and all educators have one, no matter what rating.
- Personnel decisions are impacted by results.
- Have legislation, guidelines and regulations in place today and have started implementation with some schools and districts.
- Have leveraged Race to the Top grant/plan/funding to advance evaluation design and implementation.
- Rational phase-in and timeline including first the level 4 schools (who need this the most) and early adopter districts (who are the most eager to get involved).

Weaknesses, issues, lack of clarity

- Appear to be too many opportunities to ignore educator growth ratings.
- Insufficient plan for implementation, training, and resource development
- Insufficient focus in the educator practice standards on how to best support ELLs and students with disabilities; unclear how alternative assessment for students with disabilities will be used.
- Plan for principal evaluation is not made explicit
- Plan for ensuring evaluator inter-rater reliability is not clear

Technical Assistance Suggestions

Provide more detailed implementation plans including special focus on evaluator training and inter-rater reliability.

Consider how to make the needs of SWD and ELL students explicit in educator practice rubrics and how to train evaluators to assess the required practice skills. Also ensure that growth measures (State-provided based on State assessments or —non-tested|| subject measures, and local measures) include students with disabilities and English Language learners. Also explain how teachers who provide part-time instructional services to ELLs and SWDs

will be evaluated.

Consider whether high growth/low performance ratings should trigger different interventions for educators and/or their evaluators than are currently anticipated.

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

Summary

The waiver application submitted by the State of Massachusetts contains a comprehensive overview of the State's plans for implementation of the Common Core Standards, for overhauling its evaluation and support systems for teachers and leaders, and for a system of differentiated accountability and support aimed at raising achievement and closing longstanding proficiency gaps. Given the short time available for mounting a waiver process, the State's consultation process was remarkably broad and deep. By harnessing the unusually strong capacity of its educators and the insights gleaned from long experience in teaching children to high standards, building on good State and local work in Race to the Top, and focusing efforts to come with the 2010 Act to Close the Achievement Gap, State leaders have assembled a thoughtful, coherent plan for moving the State's children ahead.

We have no doubt that, when implemented, this plan will result in improved instruction and higher levels of achievement, especially for low-income students, English Learners and students with disabilities—all a clear focus of the State's action plan. Indeed, some of this work is already underway, with encouraging results even in the first year.

All of the requirements of Principle One—implementation of common core standards—have been met. The State's plans are ambitious but well structured. We are particularly impressed with the very specific commitments around production and distribution of instructional materials—including lessons—to help teachers make the shift to Common Core. While we would have preferred more detail on the professional development and other tools that will help principals take on a leadership role in the transition—and are skeptical that the hoped for changes in IHE-based teacher and leader preparation will materialize on the expected timetable-- we are confident that the State's leaders will see these tasks through to completion. Massachusetts has been a leader in Common Core and in the PARCC assessment consortium from the beginning; its educators are deeply steeped in this work and well equipped to take the State's work to an even higher level.

Similarly, we are fully confident that the State has met the requirements of Principle Three. The State Taskforce on Educator Evaluation that did the initial work put together a thoughtful set of recommendations. These were further strengthened by the Massachusetts Department of Education and issued in the form of regulations. The model system is currently being piloted, and there is a timeline for implementation of new evaluation and support systems in every LEA. Most important, there is a development plan for every teacher, with evaluation feedback linked to professional growth supports. Certainly, things could still go awry in at least some LEAs. And we are worried that the student growth measures may not get sufficient attention, especially when the ratings are low and those growth measures suggest high impact. But on the whole, they are moving thoughtfully and responsibly through a difficult thicket.

All in all, then, the State's plans for Common Core implementation and teacher support and evaluation are commendable and fully responsive to all of the requirements in Principles 1 and 3.

We are less sanguine about whether at least some of the aspects of the proposed accountability system are

fully responsive to the requirements in Principle 2. Before describing those concerns, however, let us be clear about the many strong features of the system of differentiated accountability and support proposed by State leaders:

- Ambitious College Readiness Goals. The State has adopted very strong goals and a strong goals framework for its accountability system: to both raise overall achievement and to reduce by at least half the —proficiency gaps|| separating various groups of the State’s children from full college and career readiness. If successful, the State’s schools will not only drive significant gains for all student groups, but also reduce by half the gaps among them.
- Ambitious targets not just for improving proficiency rates, but also for increasing the numbers of students performing at the advanced level and sharply reducing the number performing at the lowest levels. The attention to both is commendable
- Clear goals in each outcomes area for every subgroup of children, with public reporting of outcomes against goals on an annual basis and annual accountability determinations based significantly on improvements for a new High Needs supergroup.
- A well-articulated framework, with aligned tools, to help LEAs and schools identify and act on conditions that lead to underachievement and strong supports from the State and a regional assistance structure organized around the elements of that framework
- Moreover, to ensure that school improvement is taken seriously by everybody involved, LEAs themselves will be rated at the level of their lowest performing school, a bold and imaginative policy choice that says, in effect, —no school district is better than its lowest performing school.||

Again, there is much to admire about this system, from its ambitious and clearly stated goals to its carefully constructed support structures.

The Panel is concerned, however, that State leaders may have undermined their likelihood of reaching their statewide, LEA, school and sub-group goals by weighing progress against the goals too little—indeed, sometimes not at all—in the actual operation of their accountability and supports system. Our fear is that, in doing so, at least some important goals—for example, reducing by half the gap between current levels of proficiency among African Americans and 100%- or of English Learners and 100% --will become rhetorical goals only (think National Education Goals), because nobody has to manage against them. And while we understand the advantages of the —high needs group|| in engaging more schools in the work of closing gaps, we know from experience that school-level educators may

look to see which among the included groups (low income students, ELL's, students with disabilities) they can move *most easily*, leaving some practices unexplored and some of the conditions that produce low achievement among *other groups* unaddressed for many years.

We believe these imperfections are critical, but fixable with relative ease.

Three changes would both vastly improve this system, and bring it into conformance with the basic requirements laid out for this waiver—that the plan promise to improve achievement and close gaps for **all** groups of students.

1. Making Sure Performance on Goals Matters at Every Level of the School Rating System. Right now, for example, exit criteria from Level 3 and 4 status do not explicitly include meeting PPI goals.
2. Adding Safeguards to Ensure Attention and Action for Continued Non-Performance for one or more subgroups—even if the school is meeting targets of improvement for its High Needs PPI.
3. Reducing minimum N size to no more than 30, bringing MA into line with most States and increasing transparency around group performance.

Among all of these, the second is the most important. Without such a safeguard, we do not believe the Massachusetts proposal fully meets the requirements set out by the Secretary for a waiver—that the proposed system promise to improve achievement for all groups of children.

Strengths

Principle 1: College and Career Ready Expectations for All Students

Massachusetts has had a long focus on College and Career Readiness and has used their MassCore to ensure preparation for post-secondary success. The State adopted Common Core in 2010 added some unique standards and features, including pre-kindergarten standards. The SEA has analyzed the extent of alignment between the State's previous content standards and the college- and career-ready standards to determine similarities and differences. In 2010 the SEA published crosswalks, and is using these crosswalks as the basis for analyzing the alignment for existing test items. As a member of the WIDA consortium the SEA intends to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards to ensure that English Learners will be able to access the new standards.

Additionally, the SEA intends to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards. The SEA has an extensive plan to provide professional development and other supports to prepare teachers to teach all students and the SEA will provide instructional modules on key aspects of the new standards. In spring of 2011 the SEA launched a professional development initiative for approximately 300 educators on the design of model curriculum units and performance assessment. The SEA will also offer targeted courses through Regional District and School Assistance Centers. The State has already pre-qualified a cadre of vendors to provide a series eight courses for districts which focus on using data effectively to improve classroom instruction. The State is also working on aligning professional standards for teacher licensure. The State plans to develop 100 model curriculum units by 2014

Massachusetts is part of the PARCC consortium and plans to administer PARCC assessments in 2014-2015. The State will augment their current assessments by adding questions and removing questions and gradually transition the content between 2011-2012 and 2013-2014 to better align their assessment with the new standards.

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

Massachusetts has set ambitious goals to reduce by half the number of students in every one of the its student groups not meeting the State's rigorous definition of proficiency. In reach these goals the State will also reduce by half the gaps between groups of students. Moreover, the State has gone even further, elaborating goals to increase the number of students for every group reaching the advanced level of performance, as well as significantly decrease the number at the lowest level of performance. The State has well developed and extensive framework that articulates the Conditions for School Effectiveness. These conditions identify research-based interventions that all schools need to implement to effectively meet the learning need of every student. Additionally the State has district standards and indicators that identify the characteristics of effective districts in supporting and sustaining these conditions in their schools. The State's request includes a comprehensive set of actions that are aligned to the —Conditions|| and turnaround principles. The panel is impressed by the comprehensive diagnostic tools for schools and districts. The same diagnostics are used at all levels of performance and they enable improvement plans that are highly responsive to specific school's needs. Massachusetts has a track record of intervening in the lowest performing schools and has systems already in place to support these interventions. Additionally their regional support structure is strong and there is evidence of the State's intention to build district capacity.

Principal 3: Supporting Effective Instruction and Leadership

Massachusetts has designed a system that uses multiple measures of student learning and educator practice with clear linkage to feedback, educator development with differentiated development plans, and Impact on personnel decisions. The new systems utilize multiple measures, both State-provided and district-level growth. The State has taken steps important steps toward ensuring that all measures used in the evaluations will be reliable and

valid. State will provide guidance for district-determined measures of growth. All educators will have a development plan and there is differentiation in the nature of the plans. The evaluation cycle and the development plans themselves build in regular feedback, also student, parents, and teacher feedback will play a role in principal evaluations.

The State has legislation, guidelines and regulations in place today and has started implementation with some schools and districts. Additionally, the State has leveraged Race to the Top grant/plan/funding to advance evaluation design and implementation.

*Weaknesses,
issues, lack of
clarity*

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

Massachusetts has set very ambitious goals—to reduce by half the number of students in every one of its student groups not meeting the State’s rigorous definition of proficiency. In meeting these goals, the State will also reduce by half the gaps between different groups of students. Moreover, the State has gone even further, elaborating goals to increase the number of students from every group reaching the advanced level of performance, as well as to significantly decrease the numbers at the lowest level of performance. These are indeed a powerful set of goals.

The State is also a high capacity State, whose educators has long experience teaching to rigorous standards, and has also built, over time, a robust system of supports for LEAs and schools. The SEA itself is very involved with its districts, especially those with low performing schools. But it has also built a very strong regional system of supports, including focused learning communities among its LEAs and schools.

The Panel is concerned, however, that State leaders may have undermined their likelihood of reaching their statewide, LEA, school and sub-group goals by weighing progress against them too little—indeed, sometimes not at all—in the actual operation of their accountability and supports system. Our fear is that, in doing so, at least some goals—for example, reducing by half the gap between current levels of proficiency among African Americans and 100%—will become rhetorical goals only (think National Education Goals), because nobody has to manage against them. And while we understand the advantages of the —high needs group||, we know from experience that school-level educators may look to see which among these groups they can move most easily, leaving some of the conditions that produce low achievement among other groups unaddressed for many years.

We believe these imperfections are critical, but fixable with relative ease.

Three changes would both vastly improve this system, and bring it into conformance with the basic requirements laid out for this waiver—that the plan promise to improve achievement and close gaps for all groups of students.

1. Making sure exit criteria (from Level 3 and 4 status) include meeting PPI goals;

2. Adding to the new system a safeguard that would ensure attention and action when an individual subgroup in the school is not meeting goals, even if the school is making progress on its PPI.
3. Reduce N size to no more than 30 and bring MA into line with most States and increasing transparency around group performance.

Principle 3: Supporting Effective Instruction and Leadership

There appears to be too many opportunities for the evidence of educator impact on student learning to be ignored in determining rewards, development needs and consequences for educators. The request did not detail a high quality plan for implementation, training, and resource development. Additionally, there is insufficient focus in the educator practice standards on how to best support ELLs and students with disabilities; unclear how alternative assessment for students with disabilities will be used. The plan for principal evaluation is not made explicit.

*Technical
Assistance
Suggestions*