

# STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

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STATE: Texas



**U.S. Department of Education**

## Background

Peer reviewers apply their professional judgment and experiences when responding to the questions in response to the criteria below. Consistent with section 1111(a)(4)(C) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), peer reviewers will conduct an objective review of State plans in their totality and out of respect for State and local judgments, with the goal of supporting State- and local-led innovation and providing objective feedback on the technical, educational, and overall quality of a State plan, including the validity and reliability of each element of the State plan. Peer reviewer notes inform the written determination of the Secretary regarding the consolidated State plan.

### Role of the Peer Reviewers

- Each peer reviewer will independently review a consolidated State plan with respect to the criteria for Title I, Part A and Title III, Part A and record his or her responses to the questions. Each peer reviewer will note where changes may be necessary for a State educational agency (SEA) to fully address statutory and regulatory requirements and may also present suggestions to improve the State plan or to highlight best practices. Each peer reviewer will create his or her individual recommendations to guide the in-person review. These individual recommendations are submitted to the Department but will not be shared with the State.
- A panel of peer reviewers will meet in person to discuss each SEA's plan. The panel of peer reviewers will generate one set of peer review notes that reflects its collective review and evaluation of the SEA's consolidated State plan, but the panel is not required to reach consensus. The notes should reflect all peer reviewer perspectives on each requirement.

After the peer review is completed, each SEA will receive the final peer review notes that include the peer reviewers' responses to the questions and any recommendations to improve the SEA's consolidated State plan. The peer review notes: 1) constitute the official record of the peer review panel's responses to questions regarding how an SEA's State plan addresses the statutory and regulatory requirements; 2) provide technical assistance to the SEA on how to improve its State plan; and 3) recommend to the Secretary what, if any, additional information to request from the SEA. Taking into consideration the peer reviewers' recommendations, the Department will provide feedback to each SEA that outlines any areas the SEA must address prior to the Secretary's approval of its consolidated State plan. If a State plan cannot be approved, the Department will offer the SEA an opportunity to revise and resubmit its State plan and have a hearing, consistent with ESEA section 8451.

Consistent with ESEA section 1111(a)(5), the Department will make publicly available all peer review guidance, training, and final panel notes. The names of peer reviewers will be made publicly available at the completion of the review of all consolidated State plans. The peer reviewers for any individual State will not be made publicly available.

### How to Use This Document

The peer review criteria are intended to: 1) support States as they develop their consolidated State plans, and 2) inform peer reviewer panels as they evaluate each consolidated State plan. This document outlines the required elements that an SEA must address in its State plan in order to fully meet the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any requirement is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed. Note that responses to some elements are required only if the specific circumstances addressed in the question are applicable to the SEA submitting the consolidated State plan (*e.g.*, if the SEA establishes an extended-year adjusted cohort graduation rate in addition to a four-year adjusted cohort graduation rate

in item A.4.iii.b.2 below). For these particular questions, if the circumstances addressed in the question do not apply to the SEA, the SEA is not required to answer the question in order to fully address the statutory and regulatory requirements.

## **Instructions**

Each peer reviewer should include individual review notes in the space provided below each consolidated State plan requirement. For each consolidated State plan requirement, a peer reviewer will provide:

- Peer Analysis: Describe the peer reviewer's justification for why an SEA did or did not meet the requirement;
- Strengths: Summarize the strengths of an SEA's response to the State plan requirement;
- Weaknesses: Summarize the weaknesses of an SEA's response to the State plan requirement, including issues, lack of clarity, and possible suggestions for technical assistance; and
- Assessment: Determine if the SEA met the State plan requirement (indicated by Yes/No)
  - If the peer reviewer indicates 'No' above, the peer reviewer must describe the specific information or clarification that a State must provide in order to meet the requirement.

The peer reviewer notes should address all of the required elements of each State plan requirement in this document, but need not address each element individually (*i.e.*, the peer reviewer notes should holistically review A.3.i about the SEA's definition for native languages, incorporating each of the four bulleted items in this element but need not individually respond to each bullet).

## SECTION A: TITLE I, PART A: IMPROVING BASIC PROGRAMS OPERATED BY LEAS

### A.1: Challenging State Academic Standards and Assessments

*Note: State Plan template item A.1 is submitted as part of the separate assessment peer review process consistent with ESEA section 1111(b) and 34 CFR § 200.2(d), and thus has no applicable peer review criteria in this document.*

### A.2: Eighth Grade Math Exception (ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4))

*Note: State Plan template items A.2.i and A.2.ii require binary yes/no responses from SEAs, and thus have no applicable peer review criteria.*

#### A.2.iii: Strategies (ESEA section 1111(b)(2)(C); 34 CFR § 200.5(b)(4))

- If applicable,<sup>1</sup> does the SEA describe, regarding the 8<sup>th</sup> grade math exception, its strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school (e.g., appropriate data and evidence that the strategies are likely to provide all students in the State that opportunity)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA describes a focus on readiness for Algebra I built into the elementary and middle school curriculum along with Algebra Ready website support. Texas Administrative Code allows for high school math courses in earlier grades and recommends Algebra I for students in grades 8 or 9. (P.8)
<i>Strengths</i>	TEA is working to provide information to all students and their families of the availability of high school mathematics in high school.  TEA's plan describes the creation of multiple strategies to support readiness for Algebra I statewide, including curriculum focal points and website for Algebra Ready.
<i>Weaknesses</i>	State plan would be strengthened by offering more detail on how the strategies it describes are being implemented (i.e. how they will help all students), including any evidence on their use to date if available.

<sup>1</sup> In order for an SEA to exempt an 8<sup>th</sup> grade student from the mathematics assessment typically administered in 8<sup>th</sup> grade under ESEA section 1111(b)(2)(B)(v)(I)(aa), it must ensure that: a. the student instead takes the end-of-course mathematics assessment the State administers to high school students under ESEA section 1111(b)(2)(B)(v)(I)(bb); b. the student's performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E); and c. in high school: (1) the student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers for 8<sup>th</sup> graders under ESEA section 1111(b)(2)(B)(v)(I)(bb); (2) the State provides for appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and (3) the student's performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E).

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

### **A.3: Native Language Assessments (ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii) and (f)(4))**

#### **A.3.i: Definition**

- Does the SEA provide its definition of “languages other than English that are present to a significant extent in the participating student population”?
- Does the SEA identify the specific languages that meet that definition?
- Does the SEA’s definition include at least the most populous language other than English spoken by the State’s participating student population?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA defines languages other than English which are spoken to a significant extent in the participating student population as greater than 10% of the total student population. TEA has identified Spanish as that language.</p> <p>TEA gives no indication by description or by data that it considered languages other than English that are spoken by distinct populations of students including English learners (ELs) who are migratory, ELs who are not born in the United States or ELs who are migratory. TEA provides no information that it considered the distribution of those students who are not native English speakers in the participating student population such as particular LEAs where they may be concentrated or concentrations across grade bands.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>State plan could be strengthened by providing more detail and data on the distribution of languages spoken across LEAs and grade levels and highlighting any spoken by distinct groups of students.</p> <p>The SEA provides no explanation for why no other assessments other than Spanish are required. It seems unrealistic that a state, particularly a border one, does not have students arriving in school districts in need of language support over elementary school age.</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The TEA should provide an analysis of distinct populations of English Learners as well as prevalence of language groups in selected LEAs.

### A.3.ii: Existing Assessments in Languages other than English

- Does the SEA identify any existing assessments that it makes available in languages other than English, and specify for which grades and content areas those assessments are available?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA provides multiple assessments in Spanish. They are the STAAR Spanish Grades 3-5 mathematics, STAAR Spanish grades 3-5 reading, STAAR Spanish grade 4 writing, and STAAR Spanish grade 5 science.
<i>Strengths</i>	TEA provides a robust menu of assessments in the elementary grades to its native Spanish speaking population, which allows students the opportunities to demonstrate proficiency in subject matter until they are able to demonstrate English language proficiency.
<i>Weaknesses</i>	It is unclear if Texas offers alternate assessments in languages other than English (plan refers to STAAR assessments but it is not clear if that means general education assessments or all assessments). It was unclear to the peers why there are no middle or high school assessments.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

### A.3.iii: Assessments not Available and Needed

- Does the SEA indicate the languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan, for which yearly student academic assessments are not available and are needed?

	<i>Peer Response</i>
<i>Peer Analysis</i>	State meets the requirements. TEA has defined Spanish as the only language that is present to a significant extent in the participating student population and has assessments available in Spanish.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is unclear why the state does not offer Spanish assessments beyond elementary school.</p> <p>It is not clear if the state offers alternate assessments in languages other than</p>

	English.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

#### A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State’s plan and timeline for developing such assessments?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
  - 1) gather meaningful input on the need for assessments in languages other than English;
  - 2) collect and respond to public comment; and
  - 3) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?
- If applicable, does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (e.g., legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates that this is “Not Applicable” due to the fact that the SEA has already developed and implemented assessments in languages other than English.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

#### A.4: Statewide Accountability Systems & School Support and Improvement (ESEA section 1111(c) and (d))

##### A.4.i: Subgroups (ESEA section 1111(b)(3), 1111(c)(2))

A.4.i.a: Major Racial and Ethnic Subgroups of Students (ESEA section 1111(c)(2)(B))

- Does the SEA list each major racial and ethnic group that the SEA includes as a subgroup of students in its accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA identifies the following racial/ethnic groups as subgroups in the accountability system: African American, American Indian, Asian, Hispanic, Pacific Islander, White, and two or more races. (P.9-10)
<i>Strengths</i>	State provides its definitions of ethnicity and percent of enrollment.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (# peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.i.b: Additional Subgroups at SEA Discretion

- If applicable, does the SEA describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) included in its statewide accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Besides evaluating the academic performance of the major racial and ethnic subgroups as well as the other statutorily required subgroups of economically disadvantaged, students with disabilities, English learners (EL), TEA also lists the following additional subgroups: Students formerly receiving special education services, continuously enrolled students and mobile students.
<i>Strengths</i>	Plan includes subgroups beyond those required, such as former special education service recipients and mobile students, showing commitment to track achievement and progress of students who could also be at risk.
<i>Weaknesses</i>	TEA offers no definition of its additional subgroups. It should be noted that throughout the plan, TEA refers to student subgroups as student groups. It would be helpful if TEA verified that what they are referring to is the actual student subgroups described in this section. It is important to assure that TEA is not referring to super subgroups, which are combined groupings of subgroups, which does not align with ESEA requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that</i>	



<i>an SEA must provide to fully meet this requirement</i>	
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**A.4.i.c: Previously Identified English Learners**

*Note: State Plan template item A.4.i.c requires a binary yes/no response from SEAs, and thus has no applicable peer review criteria.*

**A.4.i.d: If Applicable, Exception for Recently Arrived English Learners**

*Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.*

- Does the SEA describe how it will choose which exception applies to a recently arrived English learner (e.g., a statewide procedure that considers English language proficiency level in determining which, if any, exception applies)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA selects the second option therefore Peer Review is not applicable.
<i>Strengths</i>	
<i>Weaknesses</i>	State plan would be strengthened by providing detail on how many students the exceptions apply to, especially in the case of asylees/refugees that are excluded in year 1-5 of enrollment in the United States. Plan could also more clearly specify in this section what the “EL Performance” measure is.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

**A.4.ii: Minimum N-Size (ESEA section 1111(c)(3)(A))**

**A.4.ii.a: Minimum N-Size for Accountability (ESEA section 1111(c)(3)(A)(i))**

- Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?
- Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (i.e., economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

	<i>Peer Response</i>
<i>Peer Analysis</i>	State appears to define a minimum n-size of 10 for all students (in cases where

	there are fewer than 10 in a single year, data to be averaged over 3 years) and an n-size of 25 for subgroups.
<i>Strengths</i>	Including All Student group size smaller than 10 by using 3 year averaging is a strength.
<i>Weaknesses</i>	It is not clear if data is to be omitted for those students in subgroups who are in a site or LEA with less than 25 students but more than 10 students.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must clarify that it is using the same minimum n-size for all students and all subgroups. TEA should clarify what the minimum n-size is for all students and all student subgroups.

A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

- Is the selected minimum number of students statistically sound?<sup>2</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	Plan asserts that the n-size provides “statistical reliability and privacy protection” but does not explain how or why this is the case.
<i>Strengths</i>	
<i>Weaknesses</i>	TEA provides no information other than their own statement that the N-size of 25 is statistically reliable.  A minimum N-size of 25 is large and while there may be arguments of statistical stability, it will also lead to the failure to identify students in some subgroups particularly those in sites with very low overall student enrollment.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA needs to provide evidence that a minimum n-size of 25 is statistically sound.

<sup>2</sup> Consistent with ESEA section 1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the “Family Educational Rights and Privacy Act of 1974”). When selecting a minimum n-size for reporting, States should consult the Institute of Education Sciences report “[Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information](#)” to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c)(3)(A)(ii))

- Does the SEA describe how it determined the minimum number of students?
- Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

	<i>Peer Response</i>
<i>Peer Analysis</i>	It has been 5 years since SEA developed the minimum N-size of 25. TEA describes consultation by two groups, an Accountability Technical Advisory Committee and Accountability Policy Advisory Committee, which includes representatives of many stakeholder groups. The groups' recommendations were provided to the commissioner for decision making along with comments from educators via a survey. No information was provided about what was recommended by the groups. The link provided to the survey results is not working. (p.13-14)
<i>Strengths</i>	
<i>Weaknesses</i>	Plan does not describe how the minimum n-sizes were established (i.e. was any analysis done, alternate proposals examined, etc.) except to say that input and recommendations were provided and the commissioner made a decision. It is not clear why these particular n-sizes were established.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should state how the minimum n-size was determined such as what proposals were reviewed, how analysis was conducted, and how the input process influenced the decision. Additionally, TEA should clarify that n-size will be included in the upcoming review process referenced on p. 9 of the TEA plan.

A.4.ii.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c)(3)(A)(iii))

- Does the SEA describe how it ensures that the minimum number of students will protect the privacy of individual students?<sup>3</sup>

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Plan does not describe how the minimum n-sizes will protect privacy of individual students except to say that state law requires protection of student information.</p> <p>The SEA provides the section of law relative to student confidentiality.</p>

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<sup>3</sup> See footnote 5 above for further guidance.

	However, the law does not explicitly protect student identity, and requires disaggregation that may yield identifiable information.
<i>Strengths</i>	
<i>Weaknesses</i>	TEA’s plan does not describe how the minimum n-sizes will protect privacy of individual students except to say that state law requires protection of student information.  The SEA does not provide any additional information about how TEA assures protection against identification—such as small n-size, and/or masking identifiable performance (i.e., 100 or 0%).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA needs to provide information on the procedures used to protect student privacy. TEA may wish to refer to IES guidance on protecting student privacy as part of this process (included as footnote 3 within the consolidated State plan template).

A.4.ii.e: If Applicable, Minimum N-Size for Reporting

- If the SEA’s minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, does the SEA provide the minimum number of students for purposes of reporting?
- Is the SEA’s minimum number of students for purposes of reporting consistent with the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA does not specify that selected n-sizes will also be used for reporting in section A.4.ii.a, therefore peers are unable to determine what n-size is used for reporting.
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear from the description whether all groups are treated the same for accountability and reporting.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should specify what n-sizes are used for reporting, and whether or not these n-sizes are different than those used for accountability purposes.

A.4.iii: Establishment of Long-Term Goals (ESEA section 1111(c)(4)(A))

A.4.iii.a: Academic Achievement (ESEA section 1111(c)(4)(A)(i)(I)(aa))

A.4.iii.a.1: Long-term goals

- Does the SEA identify (*i.e.*, by providing a numeric measure) and describe the long-term goals for all students for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments (which must apply the same academic achievement standards to all public school students in the State, except those with the most significant cognitive disabilities)?
- Does the SEA identify and describe long-term goals for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The definition of proficiency (Approaches Grade Level) is lower than “Meets Grade Level.” This means the long term goals are not set at grade-level proficiency, as intended by the requirement. The current data show that the highest performance level on these assessments yield the best predictor of College and Career Readiness (CCR), and the state’s current “proficiency” target is two performance levels below that.</p> <p>TEA’s plan identifies “approaching” grade level as proficient, but the description of “approaches” indicates that the students may need targeted intervention and can apply knowledge and skills in familiar contexts only. This performance standard is not ambitious and the timeline to reach it is long.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	Working “backwards” from postsecondary expectations provides a logical base for how to frame expectations, however TEA chose a level of proficiency below grade level expectations as the key link.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA needs to base long-term goals on the percent of students that “Meets Grade Level,” not the percent of students at “Approaches Grade Level” in order to assure that students are successful in meeting grade level expectations, and ultimately achieving success in college or career.</p> <p>TEA should set goals to ensure that significant percentages of students meet grade level expectations in reasonable amounts of time.</p>

A.4.iii.a.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
- Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The table provided by TEA in Appendix A lists same expectations for all subgroups without explanation about how groups that are only at 35%

	<p>proficiency could attain the same proficiency levels as groups that are currently at 71%. The result of the across-the-board listing of proficiency levels means that the proficiency expectations after 5 years are actually lower for some subgroups than they are currently performing. (White, Asian, two or more races).</p> <p>There are also other subgroups that are expected to make extraordinary progress in just a relatively short period of time. For example, in reading/ELA, the Special Education students for all grades across the state are expected to increase their academic achievement by 45.1 percentage points (34.9 to 80) in 5 years.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The data appears to require some groups to fall back in proficiency while other groups would have to make gains that stretch the boundary of what is possible.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should provide meaningful interim measures of progress such that all student subgroups demonstrate progress every year.

A.4.iii.a.3: Improvement necessary to close statewide proficiency gaps

- Do the long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The current goals and measurements of interim progress do not require improvement for all subgroups of students. The interim targets for subgroups proposed by TEA do not result in closure of gaps for all subgroups.</p> <p>As stated, the value tables for the Long Term Goals (LTGs) and Measurements of Interim Progress (MIPs) appear to require very large rates of improvement from the lowest performing students relative to the LTGs of reaching proficiency. The MIPs also require that the majority of these gains would be made in the first few years rather than distributing these expectations more evenly over the entire term that the state has determined is appropriate.</p> <p>TEA’s state plan provides a specific description of how the state will ensure that schools will be held accountable for meeting targets over a 5-year period while also offering credit for schools that are making improvements but do not meet interim targets in a given year.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The data appears to require some groups to fall back in proficiency while other groups would have to make gains that stretch the boundary of what is possible.

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should provide interim progress indicators that require improvement of all subgroups and also ensure closing existing achievement gaps.

A.4.iii.b: Graduation Rate (ESEA section 1111(c)(4)(A)(i)(I)(bb))

A.4.iii.b.1: Long-term goals for four-year adjusted cohort graduation rate

- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for all students?
- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Given the baseline graduation rate of 89%, the peers hold the position that a target of 94% is not ambitious given that it requires the Asian subgroup to reduce current rates in order to meet the long term target.</p> <p>TEA identifies long term goals for 4 year adjusted cohort graduate rates which is the same for all subgroups of students (excluding the additional subgroups that TEA created). Baseline data is presented along with a timeline for meeting goals in the form of 5 year clusters over a 15 year period. The 94% goal over a 15 year period for all subgroups is ambitious for some groups that are currently below 80% but not ambitious for those that are currently close to or meeting the long-term goal. (P. 18 and Appendix A)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Peers noted that given the relatively high current graduation rates, it may be difficult for TEA to establish ambitious targets without considering graduation requirements. For example, low proficiency levels and expectations are inconsistent with relatively high graduation rates.</p> <p>Expectations for the Asian subgroup are actually lower than current rates.</p> <p>State plan could clarify why the 94% figure was selected and why the state believes this is an ambitious goal given current rates of 90%. Goal definitely seems ambitious for some subgroups (e.g. ELLs at baseline level of ~70%) but not others.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information</i>	TEA should provide graduation rate goals that require improvement of all subgroups and also ensure closing existing achievement gaps.

*or clarification that an SEA must provide to fully meet this requirement*

A.4.iii.b.2: If applicable, long-term goals for each extended-year adjusted cohort graduation rate

- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for all students?
- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?
- Are the long-term goals more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Given that the current baseline graduation rate is already 90.4%, and a timeline of more than ten years, the peers hold the position that a target of 96-97% is not ambitious.</p> <p>The SEA identifies long term goals for 5- and 6-year adjusted cohort graduation rates which are the same for all subgroups of students (excluding the additional subgroups that SEA created). The goal over a multi-year period for all subgroups is ambitious for some groups that are currently below 80% but not ambitious for those that are currently close to or meeting the long-term goal. (Appendix A)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Peers noted that given the relatively high current graduation rates, it may be difficult for TEA to establish ambitious targets without considering graduation requirements. For example, low proficiency levels and expectations are inconsistent with relatively high graduation rates.</p> <p>State plan could clarify why the specific figures were selected and why the state believes they are ambitious goals given current baseline data.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA should provide extended graduation rate goals that require improvement of all subgroups and also ensure closing existing achievement gaps.</p>



A.4.iii.b.3: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students?
- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	State identifies measures of interim progress toward long-term goals for the 4-year, 5-year, and 6-year adjusted cohort graduation rates for all students (including subgroups). However, the table in Appendix A lists same expectations for all subgroups without explanation about how groups, such as ELLs that are only at 71.5% could attain the same 4 year graduation rates as groups that are currently near or above 94%. The result of the across-the-board listing of graduation rates means that the expectations after 12 years are actually lower for some subgroups (Asian) than they are currently. These same issues are present in the extended graduation rate measures of interim progress.
<i>Strengths</i>	
<i>Weaknesses</i>	Peers noted that given the relatively high current graduation rates, it may be difficult for TEA to establish ambitious targets without considering graduation requirements. For example, low proficiency levels and expectations are inconsistent with relatively high graduation rates.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should provide meaningful interim measures of progress such that all student subgroups demonstrate progress every year.

A.4.iii.b.4: Improvement necessary to close statewide graduation rate gaps

- Do the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide graduation rate gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that graduate from high school at lower rates?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The current goals and measurements of interim progress do not require significant improvement for all subgroups of students. For example, the subgroup for White Only needs only to improve .6% to meet expectations.</p> <p>As stated, the tables in Appendix A appear to require very large rates of improvement from the lowest performing students relative to the LTGs for graduation rates.</p>

<i>Strengths</i>	
<i>Weaknesses</i>	Peers noted that given the relatively high current graduation rates for some subgroups, it may be difficult for TEA to establish ambitious targets without considering graduation requirements. For example, low proficiency levels and expectations are inconsistent with relatively high graduation rates.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should provide long term goals and interim progress indicators that require significant improvement of all subgroups and also ensure closing existing achievement gaps.

A.4.iii.c: English Language Proficiency (ESEA section 1111(c)(4)(A)(ii))

A.4.iii.c.1: Long-term goals

- Does the SEA identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment?
- Does the SEA’s description include baseline data?
- Does the SEA’s description include the State-determined timeline for English learners to achieve English language proficiency?
- Is the long-term goal ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA’s state plan identifies and describes the long-term goal for increases in percentage of ELs making progress (46% by 2032) but does not include the timeline for ELs to achieve English language proficiency. Baseline data is provided.</p> <p>Peers feel that there is not enough information to judge whether the goal of 46% (at the end of 15 years) is ambitious. The SEA will be using a new form of the TELPAS English proficiency assessment next year. TEA indicates the goal is set based on past versions of the assessment. The current baseline is 40.9% and there is a 15 year timeline projected in 5 year cycles of improvements. (P.19)</p> <p>A more than 10-year period to achieve only a 5% increase in the rate of progress for students who are working to become proficient in the English language seems to suggest that either the assessment is very rigorous or that the exit requirements are equally rigorous.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>TEA has not presented a state-determined timeline for ELL students to achieve ELP therefore it is difficult to evaluate the target rate of progress.</p> <p>TEA could clarify why the goal of 46% is ambitious given baseline data (40.9% currently demonstrating progress). The State plan would be strengthened by clarifying what the goal means – later in the plan it appears</p>

	that making progress requires students to move up at least one proficiency level on the TELPAS, which suggests that the goal is for nearly half of students to move up one proficiency level each year, but an example or clarification would be useful to confirm/explain this.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must provide state-determined timelines for ELs to achieve English Language Proficiency.  TEA should provide more information about how TELPAS defines making progress from level to level and year to year.  TEA should provide historical data to illustrate how a 5% improvement over the course of 15 years represents an ambitious goal.

A.4.iii.c.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA provides measurements of interim progress toward the long-term goal for increase in the percentage of ELL making progress in achieving ELP. The information is presented in three 5-year time periods. It would be helpful to have this data in yearly increments to facilitate evaluation of their plan. The exact date of the baseline year is unclear.
<i>Strengths</i>	
<i>Weaknesses</i>	State plan would be strengthened by explaining how the measurements of interim progress were developed.  Interim targets are modest, approximately 2% for each five year period, or less than ½ percent per year. It is unclear how these modest targets will impact student achievement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

*Note: A single indicator may consist of multiple components or measures. Peers must review each such component or measure for compliance with all of the required elements.*

A.4.iv.a: Academic Achievement

- Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
- Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure (e.g., a growth model); and 5) if the State averages data, a description of how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Can the indicator be disaggregated for each subgroup of students?
- Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?
- Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The SEA will use STAAR results for grades 3-8 and end of course assessments for high school. While reading and math are included, other subjects are also mentioned (writing, science, social studies), making it difficult to understand how these are directly related to long term goals, and there is no information about weighting. There is no information describing how data is averaged across years or grades. The level of proficiency is described again as at or above the “Approaches Grade Level” standard. (P.22)</p> <p>There is no information that this will be based on a 95% participation of all students and 95% participation of all students in each subgroup.</p> <p>No information is provided regarding reliability and validity of the indicator.</p> <p>The state plan describes its academic achievement indicator as the percentage of assessments at or above the “approaches grade level” standard for all students and student groups by subgroups.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The description of Academic Achievement Indicator is brief and lacks critical information, which may lead to misinterpretation of the outcomes for this indicator.</p> <p>It is not clear how the academic achievement indicator is weighted in the state’s A-F system or how exactly it is calculated, nor is there any discussion of how the indicator relates to long-term goals. More detail on how the indicator is calculated would strengthen the plan.</p> <p>The SEA does not provide indication of how it calculates this measure, whether the measure is valid or reliable, or how participation is taken into account.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers)

	<input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must describe in detail how the indicator is calculated, whether the indicator utilizes ELA and math only, how it is consistent across all subgroups and schools, whether the measures are valid and reliable, how data is averaged across grades, how it is consistently applied across all subgroups and schools, how it ensures 95% participation rate of schools and subgroups, and how the indicator is related to long-term goals.

A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools

*Note: If the SEA uses a different Other Academic indicator for each grade span, peer reviewers must separately review each indicator that an SEA submits. For example, if an SEA submits one Other Academic indicator for elementary schools and a different Other Academic indicator for middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator.*

- Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- Does the SEA describe, if applicable, how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peers struggled to determine what the indicator is and how the indicator is calculated (e.g. is it a measure of individual student growth aggregated to the school level or a measure of change in cohort performance). It's also not clear what the performance threshold is for this indicator or how it fits into the state's overall A-F system or how it provides meaningful differentiation of schools.
<i>Strengths</i>	
<i>Weaknesses</i>	TEA provides little to no information concerning method of calculations to determine values for this indicator.  Growth appears to be credited if the school maintains a high performance level (presumably meaning above the threshold for that cycle in terms of the Approaches Grade Level standard) or even if failing to achieve the standard, at least shows any positive change from the previous year.  It is not clear how reading and mathematics are combined (e.g., peers could not determine the implications for growth overall if there is growth in one subject but not the other). p.22  It's not clear what the performance thresholds are for this indicator or how it

	fits into the state’s overall A-F system.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must describe in detail how the indicator is calculated, what subjects and grades are included, how it is consistent across all subgroups and schools, whether the measures are valid and reliable, how data is averaged across grades, how it is consistently applied across all subgroups and schools, and how it fits into the overall A-F system, and will yield meaningful differentiation of schools.

A.4.iv.c: Graduation Rate

- Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?
- Does the description include how the SEA calculates the indicator including: 1) that the calculation is consistent for all high schools, in all LEAs, across the State; 2), if applicable, whether the SEA chooses to lag adjusted cohort graduation rate data; and 3) if applicable, how the SEA averages data (e.g., consistent with the provisions in ESEA section 8101(23) and (25), which permit averaging graduation rate data over three years for very small schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Is the indicator based on the four-year adjusted cohort graduation rate?
- If the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, does the description include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator?
- If applicable, does the SEA’s description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA does not provide information about what constitutes this indicator or how it fits into the overall A-F system.</p> <p>TEA’s brief description lacks detail. Based on the information provided, it is difficult to determine: (1) if the calculation is consistent for all high schools across the state, (2) if the TEA is describing a method to “lag” the ACGR, (3) how the indicator relates to the state’s LTGs (4) since it appears the state will use the 5 and 6-year EACGR, exactly how they are combined with the 4-year ACGR in this indicator (5) how they will report out the graduation rate for students with the most significant cognitive disabilities who take an alternate state assessment aligned with the state’s alternate academic standards for these students, and (6) how the data will be disaggregated for subgroups.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA does not provide the details required for this element.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must describe how the indicator is used as part of the accountability system, including what the performance thresholds are, how the different rates (4 year and extended year) are combined, how they will report out the graduation rate for students with the most significant cognitive disabilities taking alternate assessments, how small schools will be treated, and how the data will be disaggregated for subgroups.
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A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

- Does the SEA describe the Progress in Achieving English Language Proficiency indicator used in its statewide accountability system, including that the SEA uses the same indicator across all LEAs in the State?
- Is the indicator valid and reliable?
- Is the Progress in Achieving English Language Proficiency indicator aligned with the State-determined timeline described in A.4.iii.c.1?
- Does the indicator consistently measure statewide the progress of all English learners in each of grades 3 through 8 and in the grade for which such English learners are otherwise assessed under ESEA section 1111(b)(2)(B)(v)(I) during grades 9 through 12?
- Does the SEA’s description include the State’s definition of English language proficiency, based on the State English language proficiency assessment?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA frames the indicator as the percent of English learners in grades K-12 who have made progress since “last assessed.” Increase is defined as changing at least one level in the composite rating. If a student is at the highest performance level, the student must at least maintain that performance level. It is not clear how the indicator averages across grade levels and how it fits into the overall A-F system. Because the state did not provide a timeline for achieving English language proficiency, it’s not possible to determine how the indicator aligns to a timeline. There is no specific information as to the frequency in which the assessment is administered; therefore, a statement about consistency of measurement cannot be determined. The state does not provide a definition of ELP as it relates to either the composite score on the TELPAS or any other factor.
<i>Strengths</i>	
<i>Weaknesses</i>	TEA provides no formulas with samples of computations that would enable a determination as to the validity and reliability of the indicator as stated. Since TEA has not indicated a state-determined timeline for attaining ELP as described in A.4.iii.c.1, a statement concerning the nature of alignment cannot be made. There is no specific information as to the frequency in which the assessment is administered; therefore, a statement about consistency of measurement cannot be determined. The state definition of ELP as it relates to either the composite score on the TELPAS or any other factor is not evident.  The indicator covers k-12 but the intended focus is on grades 3-8 and designated high school grades.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information</i>	TEA must provide a state definition of ELP. TEA must indicate to what grades the indicator applies. TEA must provide a timeline for ELP and show how this

<i>or clarification that an SEA must provide to fully meet this requirement</i>	indicator is aligned to that timeline, and how it averages across grade levels.
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A.4.iv.e: School Quality or Student Success Indicator(s)

*Note: Peer reviewers must separately review each School Quality or Student Success indicator that an SEA submits. For example, if an SEA submits one School Quality or Student Success indicator for high schools and a different School Quality or Student Success indicator for elementary and middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator. For any School Quality or Student Success indicator that does not apply to all grade spans, the SEA’s description must include the grade spans to which it does apply. (ESEA section 1111(c)(4)(B)(v))*

- Does the SEA describe each School Quality or Student Success indicator used in its statewide accountability system for all public schools in the State?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- Does the indicator allow for meaningful differentiation in school performance?
- Is the indicator valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent way?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA proposed a SQSS for both elementary/middle schools and for high schools.</p> <p>Elementary and Middle schools:</p> <p>TEA defines this indicator as the percentage of students at or above the “meets grade level” standard in reading/ELA and mathematics. This will apply for all public schools in the state serving students within these grade bands. TEA states that the indicator can be disaggregated by student subgroups for grades and subjects assessed. The wording suggests that indicator is rated separately by subject but no information is provided regarding how the ratings for subjects are combined. (P. 23)</p> <p>High Schools:</p> <p>TEA states that this indicator will measure “achievement outcomes of annual graduates on college, career, and military readiness”. TEA offers 10 options by which students can demonstrate college and career or military readiness, but also states that graduates can meet this standard if they meet only one of the standards. The SEA does not provide information about whether or not this indicator is disaggregated by subgroup, how it will be consistently calculated across schools, how the components are comparable, how the measure is comparable across schools, what the performance thresholds are, how it allows for meaningful differentiation, how it is specifically calculated, whether it is valid and reliable, and how it fits into the overall A-F system.</p>
<i>Strengths</i>	



<i>Weaknesses</i>	<p>Elementary &amp; Middle Schools:</p> <p>Peers were unable to determine whether the method described will yield meaningful differentiation of schools. It's also not clear what the performance thresholds are for either indicator or how they fit into the state's overall A-F system.</p> <p>Calculation details would be helpful for the elementary and middle school SQ/SS indicator. Most details of the multiple elements for the SQ/SS indicator for high school are also lacking. The ability to evaluate the usefulness of the elements of this indicator cannot be made.</p> <p>For High Schools:</p> <p>The SEA does not provide information about whether or not this indicator is disaggregated by subgroup, how it will be consistently calculated across schools, how the components are comparable, how the measure is comparable across schools, what the performance thresholds are, how it allows for meaningful differentiation, how it is specifically calculated, whether it is valid and reliable, and how it fits into the overall A-F system.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>For Elementary and Middle:</p> <p>TEA must indicate how the proposed indicator will yield meaningful differentiation of schools and how this indicator fits into the overall A-F system. TEA must indicate how subjects will be combined, and how data will be averaged across grade levels.</p> <p>For High School:</p> <p>TEA must provide information about whether or not this indicator is disaggregated by subgroup, how it will be consistently calculated across schools, how the components are comparable, how the measure is comparable across schools, what the performance thresholds are, how it allows for meaningful differentiation, how it is specifically calculated, whether it is valid and reliable, and how it fits into the overall A-F system.</p>

#### A.4.v: Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))

##### A.4.v.a: State's System of Annual Meaningful Differentiation

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
- Is the State's system of annual meaningful differentiation based on all indicators in the State's accountability system?
- Does the State's system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State's accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA provides only a very broad description of how the indicators are combined to form a rating of all schools. It appears that not all indicators are included—indicators for English proficiency and the school quality related to

	Meets Grade Level do not appear to be included. It isn't clear how the domains are combined/weighted to form the A-F grading system. It is not clear how comparisons with other schools with similar demographics as described in the School Progress domain are used. In the Closing the Gaps domain, it seems that penalties are applied if subgroups show that students aren't "doing well" but not clear what that means/how determined. The additional subgroups are mentioned as being included here for determining gaps but it has not been clear in previous indicators that these data are being collected. It is not clear how indicators within the domains are weighted. (P.25)
<i>Strengths</i>	
<i>Weaknesses</i>	The SEA provides a very broad overview which does not respond to the specific requirements of the element.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA must describe how its A-F system will meaningfully differentiate, on an annual basis, all public schools in the State.</p> <p>TEA must describe if the State's A-F system of annual meaningful differentiation is based on all indicators in the State's accountability system.</p> <p>TEA must demonstrate that State's A-F system of annual meaningful differentiation includes the performance of all students and each subgroup of students on each of the indicators in the State's A-F system.</p>

A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
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<i>Peer Analysis</i>	<p>It is not clear how each indicator is weighted within the domains described as part of the A-F system, or how the indicators are weighted if indicators cannot be calculated. It is not possible to discern if the relevant indicators carry substantial weight, or in aggregate, much greater weight than other indicators.</p> <p>English language proficiency is not mentioned in the domains.</p> <p>There is no information about weighting indicators when indicators can't be calculated because of minimum N-size (we know that is a likely problem given the initial information about the number of schools that won't be included given the N-size).</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The lack of information can create a misunderstanding about the intended weight of academic indicators.</p> <p>It appears that the School Progress domain could outweigh the Student Achievement domain in the A-F ranking which is not aligned with ESSA requirements.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>SEA must describe the weighting of each individual indicator and overall weighting in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator).</p> <p>This description should specifically include a demonstration of how Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually and how Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate.</p>

A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

- If the SEA uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State's plan for schools for which an accountability determination cannot be made (e.g., P-2 schools), does it describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement?
- Does the SEA's description of a different methodology indicate the type(s) of schools to which it applies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	State did not respond to this item in its plan.
<i>Strengths</i>	
<i>Weaknesses</i>	SEA does not describe how to handle schools for which an accountability

	determination cannot be made. Peers note that earlier tables indicate that there are K-2 schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must indicate whether or not they use a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State’s plan for schools for which an accountability determination cannot be made (e.g., P-2 schools).

**A.4.vi: Identification of Schools (ESEA section 1111(c)(4)(D), 1111(d)(2)(C)-(D))**

**A.4.vi.a Comprehensive Support and Improvement Schools—Lowest Performing**

- Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement including, if applicable, how it averages data (e.g., does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (i.e., does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	State will identify the lowest 5 percent of schools based on overall composite score from its A-F system. The methodology to obtain a composite score is not clear, though selecting the bottom 5% based on that score (however determined) seems straightforward and will appropriately identify schools for comprehensive support and improvement. However, as noted in previous peer comments, the A-F system is unclear, does not appear to include all required indicators e.g., ELP, nor to weight them as required.
<i>Strengths</i>	
<i>Weaknesses</i>	Information is incomplete and does not provide enough information to determine if the state’s A-F system will produce a rank ordering that will allow for the identification of the lowest 5% of schools receiving Title I, Part A funds as being in need of Comprehensive support and improvement.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must describe all aspects of the A-F system in order for peers to determine whether or not the state can appropriately identify schools for comprehensive support or improvement.

A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates

- Does the SEA describe its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement, including: 1) a description of whether the SEA uses one or more extended-year adjusted cohort graduation rates in addition to the four-year adjusted cohort graduation rate and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in the identification of all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA will use the four-year graduate rate and the 67% threshold to identify all high schools not meeting the criterion for comprehensive support and improvement. This applies to all high schools. On page 27, state provides clarification that 2017-2018 will be first year criteria is applied for identification.
<i>Strengths</i>	
<i>Weaknesses</i>	State’s description does not discuss averaging data, nor does it discuss the timeline for identifying high schools in this section.  Page 9 discusses the timeline for implementation of a new accountability system as beginning in 2018-19 (“with the release of August 2018 accountability ratings,” presumably based on 2017-18 data).
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

- Does the SEA describe its methodology to identify schools receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (*i.e.*, based on identification as a school in which the performance of any subgroup of students, on its own, would lead to identification as one of the lowest-performing five percent) that have not satisfied the statewide exit criteria for such schools within a State-determined number of years?
- Does the SEA’s methodology result in the identification of such schools?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA will identify schools for comprehensive improvement that were identified for targeted support for three years—presumably if they haven’t made progress. No information is provided about what progress threshold involves.

	This applies to schools receiving Title I funds.  One reviewer felt that the presence of an exit requirement can only be assumed due to lack of specificity in this section.
<i>Strengths</i>	
<i>Weaknesses</i>	One reviewer felt that it is not possible to affirm that the use of the state’s methodology will result in the appropriate identification of these schools.  State could clarify what happens if schools are identified in non-consecutive years (e.g. targeted support, not targeted support, targeted support) but cycle in and out of targeted support status.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewers) <input checked="" type="checkbox"/> No (1 peer reviewer)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	One reviewer holds the position that TEA must provide specific information on its methodology to identify school for comprehensive support and improvement - Additional Targeted Support Not Exiting Such Status to illustrate how these schools achieve this designation.

A.4.vi.d: Frequency of Identification

- Does the SEA include the frequency with which the State will identify each type of school for comprehensive support and improvement after the first year of identification?
- Does the SEA’s timeline result in identification of these schools at least once every three years?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA will identify schools annually beginning with the 2017-18 school year.
<i>Strengths</i>	State’s plan goes beyond identification of schools every 3 years.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi.e: Targeted Support and Improvement Schools—“Consistently Underperforming” Subgroups

- Does the SEA describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students, including its definition of “consistently underperforming”?
- Does the SEA’s methodology result in the identification of any school with one or more “consistently underperforming” subgroups of students?
- Is the methodology based on all indicators in the statewide system of annual meaningful differentiation?
- Does the SEA identify these schools annually?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA states that it will annually identify any school using the state’s “Closing the Gaps Domain” as Targeted Support and Improvement when “one or more significant achievement gaps” can be identified between individual student groups. Reviewers were referred to Appendix B of this plan to access details concerning the “Closing the Gaps Domain” however, a review of Appendix B and all other pages appearing at the end of the plan revealed materials that had nothing to do with the state’s rating system. TEA defines “consistently underperforming as a school having one or more student groups that do not meet interim benchmark goals for three consecutive years”. In view of the fact that no information could be found about the methodology used to determine values for the Closing the Gaps Domain, it is not possible to determine if this is a valid method to identify schools for Targeted Support or how TEA determines if benchmarks are met. It is also not possible to determine if the TEA’s methodology will result in the identification of any school with one or more “consistently underperforming” subgroups of students. There is also no indication that the methodology is based on all indicators of the statewide system of annual meaningful differentiation.
<i>Strengths</i>	
<i>Weaknesses</i>	Information is incomplete or missing to support a determination of the usefulness of the “Closing the Gaps Domain” as a tool used to identify schools as Targeted Support and Improvement Schools-Consistently Underperforming.  It isn’t clear how the “Closing the Gaps domain” is used in conjunction with the benchmark goals above. It isn’t clear that all indicators are involved in the identification. It is not clear how “significant achievement gap” is defined for the purpose of the Closing the Gaps domain. There is a reference to Appendix B about the Closing Gaps domain but that Appendix does not seem to relate to this issue (It is a GEPA document). It is not clear how often identification will be made and that all subgroups are included.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must clarify what indicators are used in the “closing the gaps” domain to show that its identification of schools with consistently underperforming subgroups is based on all indicators required.

A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support

- Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more

consistently underperforming subgroups and 2) if applicable, how the SEA averages data (e.g., does the State use a uniform averaging procedure across all schools)?

- Does the SEA’s methodology result in identification of such schools?
- Does the SEA include the year in which the State will first identify such schools (i.e., does the timeline comply with the Department’s guidance)?
- Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	<i>Peer Response</i>
<i>Peer Analysis</i>	In describing its methodology for identifying schools for Additional Targeted Support, TEA states that “any school that is not identified for comprehensive or targeted support and receives an “F” rating in the Closing the Gaps domain will be identified for additional targeted support.” There is no information included in the TEA plan regarding the Closing the Gaps Domain, therefore a determination on the methodology cannot be made. TEA does appear to indicate from their statement that these schools will be identified from all schools in the state. TEA states that the identification of these schools will be in August of 2018 and will occur on an annual basis.
<i>Strengths</i>	
<i>Weaknesses</i>	There is incomplete or missing information that would support a determination of the use of the “Closing the Gaps Domain” as a methodology that meets requirements for identifying schools as Targeted Support and Improvement schools- Additional Targeted Support.  The methodology for computing scores for this domain is not clear (including what indicators are used).
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA needs to describe its methodology for identifying schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D). TEA should clarify exactly what indicators are used to identify schools for additional targeted support using its “closing the gaps” domain and how A-F scores are computed for this domain.

A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

- If the State chooses, at its discretion, to include additional statewide categories of schools, does the SEA describe those categories?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A – TEA indicated this section was “not applicable.”
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input type="checkbox"/> No (0 peer reviewers) <input checked="" type="checkbox"/> N/A (4 peer reviewers)



<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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**A.4.vii: Annual Measure of Achievement (ESEA section 1111(c)(4)(E)(iii))**

- Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?
- If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (e.g., 92 percent participation rate vs. 70 percent participation)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA suggests that a participation rate of less than 95 percent on ELA and math assessments will be in the Closing the Gaps domain report but there is no information about how that rate would factor into a judgment about the domain score, e.g., does less than 95% automatically result in an F rating? (p. 28 and Appendix A.) Participation rate is not mentioned in the earlier description (p. 25) of the “closing the gap” domain. Consequences for low participation rates are not provided.
<i>Strengths</i>	
<i>Weaknesses</i>	The information is incomplete and does not provide an opportunity to determine how the TEA will factor in failure in participation rates in schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must clarify how participation rate will factor into its accountability system. TEA must clarify how, if at all, it differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement.

**A.4.viii: Continued Support for School and Local Educational Agency Improvement (ESEA Section 1111(d)(3)(A))**

**A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools (ESEA section 1111(d)(3)(A)(i)(I))**

- Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State’s long-term goals and measurements of interim progress?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Is the number of years no more than four years?

- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA states that CSI schools that no longer rank in the bottom 5% of performance for two years will fulfill the state determined requirement for having exited comprehensive support status. TEA gives no explanation of how the exit criteria are aligned with the State’s long-term goals and measurements of interim progress. TEA does not indicate if the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified).
<i>Strengths</i>	
<i>Weaknesses</i>	TEA provides little detail to determine the efficacy of their state determined exit criteria.  Two years is a short time to assume stability of improvements—especially given that three years is assumed for targeted schools to exit.  State plan could address situations where schools bounce between the bottom 5 percent and upper 95% from year to year.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must demonstrate that exit criteria ensure continued progress to improve student academic achievement and school success in the State, to elaborate, schools must demonstrate absolute academic progress rather relative ranking compared to other poorly performing schools.

A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support (ESEA section 1111(d)(3)(A)(i)(II))

- Does the SEA describe its statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), which may include how the exit criteria align with the State’s long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school’s identification and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA offers that its state-wide exit criteria for schools identified for Additional Targeted Support are those schools that “no longer meet identification criteria

	in the Closing the Gaps Domain”. They also state that schools are expected to exit this status within 3 years. TEA does not demonstrate how the exit criteria aligns with the State’s long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps. TEA does not describe that the exit criteria ensures that continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school’s identification and ensure that a school that exits no longer meets the criteria under which the school was identified).
<i>Strengths</i>	
<i>Weaknesses</i>	Depending on Closing the Gaps domain as exit criteria is problematic because as previously noted peer reviewers cannot ascertain what the Closing the Gaps Domain entails.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA should describe how its exit criteria aligns with the State’s long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps.  TEA should describe how exit criteria will ensure continued progress to improve student academic achievement and school success in the State.

A.4.viii.c: More Rigorous Interventions (ESEA section 1111(d)(3)(A)(i)(I))

- Does the SEA describe the more rigorous State-determined action required for schools identified for comprehensive support and improvement that fail to meet the SEA’s exit criteria within a State-determined number of years, which may include interventions that address school-level operations, such as changes in school staffing and budgeting or the school day and year?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The SEA indicates that after two years, the school will be required to submit a school turn around/continuous improvement plan. After five years, the school is subject to more rigorous measures including: “closure of the school; restarting the school in partnership with a charter school; converting the school to a charter school with an independent governing board, new leadership team, and redesigned school model; appointing a Conservator to oversee the school or LEA; or inserting a state-appointed Board of Managers to oversee the entire LEA.” (Pg 29.)
<i>Strengths</i>	The idea of a data-based review and turnaround plan at 2 years is a good idea. The 5 year intervention is definitely stringent and does include a variety of options that are similar to long standing turnaround strategies which essentially change the structure/management/operational oversight of a school.
<i>Weaknesses</i>	5 years may be too long to wait for a stringent intervention.

	School improvement processes that yield lasting turnaround often take significant amounts of time. The SEA would benefit from not waiting two years before requiring a turnaround plan.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.viii.d: Resource Allocation Review (ESEA section 1111(d)(3)(A)(ii))

- Does the SEA describe how it will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>SEA plans to develop process to review allocation of federal resources in LEAs with significant number of schools identified for improvement, but does not describe what the process will be or how often it may take place.</p> <p>The review will include a comparative analysis of expenditures of students on Title I schools versus those in non-Title I schools. The TEA also indicates that they will initially focus on those LEAs who have the highest percentage of school identified for Comprehensive and Targeted Support. After the analysis, TEA indicates that they will provide support to LEAs in terms of analytics on resource allocation.</p> <p>One reviewer held the position that while the state could provide more clarity about the process, the minimum requirements of the element were met.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Resource allocation review should apply to all resources—not only federal resources.</p> <p>State could provide more clarity on what the process will likely entail.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer) <input checked="" type="checkbox"/> No (3 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must consider how all resources (including personnel, materials, policies, procedures, etc.) not just federal resource allocation will be reviewed to support school improvement. TEA must describe key components of the process to be developed.

A.4.viii.e: Technical Assistance (ESEA section 1111(d)(3)(A)(iii))

- Does the SEA describe the technical assistance that it will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?
- Is the technical assistance likely to improve student outcomes by, for example, 1) identifying State-approved evidence-based interventions; 2) supporting LEAs and schools in the development and implementation of support and improvement plans; and 3) differentiating the technical assistance?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>State describes a range of supports to be provided, including supports for school boards, LEAs, and schools such as resource toolkits and direct technical assistance and training.</p> <p>While some supports have been developed, it seems that for the most part the supports for LEAs are yet to be developed. The topics for supports are appropriate ones. The idea of a continuum of assistance is a good one but yet to be fleshed out. (P.30)</p> <p>Some supports are focused on assisting School Boards in helping them plan and make decisions that will support the turnaround work in the district. TEA will also provide support to school sites in helping them choose third parties who will assist the school with specific school improvement strategies. They will also assist sites with the engagement of parents and community stakeholders as the school and LEA put in place all of the various strategies to improve the school. Some strategies listed are now in place and have been historically utilized and some are now being established. TEA stated that new TA services will be implemented by the 2018-2019 school term.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Few actual details available regarding the specifics of the technical assistance to be provided are available, which peers found concerning given that schools will be identified in need of support within the next few months.</p> <p>State could more clearly articulate how these supports are aimed at improving student outcomes.</p> <p>The SEA does not include any description of the vetting process utilized for approving service partners.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	TEA must provide evidence of how technical assistance options are likely to improve student outcomes.

A.4.viii.f: If Applicable, Additional Optional Action

- If applicable, does the SEA describe the action that it will take to initiate additional improvement in any LEA with a significant number or percentage of schools that it consistently identifies for comprehensive support and improvement and are not meeting the State’s exit criteria or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans?

	<i>Peer Response</i>
<i>Peer Analysis</i>	TEA states that for LEAs that have schools who are not exiting Comprehensive and Targeted support status and who have been identified for a prolonged period of time they will institute actions such as the appointment of a Conservator, Monitor or Board Manager to oversee the management of the LEA.
<i>Strengths</i>	
<i>Weaknesses</i>	The description is general—it would be helpful to tighten up what would actually trigger this stage of intervention.  It’s unclear how additional governance solutions on their own will provide for significant improvement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

**A.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B))**

- Does the SEA describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?<sup>4</sup>

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<sup>4</sup> Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA’s state plan does not describe the extent to which low-income or minority children are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, though it does offer ideas on how to address such disproportionalities. Plan does not describe the measures used but does reference the state equity plan which may contain them.</p> <p>In its response, the SEA references its online Texas Equity toolkit which does explain to LEAs the analyses that they are required to perform to ensure that low income and minority students are not taught disproportionately by inexperienced, ineffective or out of field teachers. Inexperienced teachers are defined as those in their first two years of teaching; effectiveness is assessed using the dimensions of the T-TESS evaluation system, student learning and student engagement; out-of-field is determined by certification. The toolkit includes detailed instructions for how to calculate equity gaps. There is no data provided in the response about any actual disproportionality. Such an analysis likely does exist—the heading of the table of solutions suggests there may be significant differences in rates.</p> <p>The SEA has also included a list of strategies/programs that it has in place to assist in the improvement of training and support for all teachers and leaders—but that is not what is required for response to this particular item. (p.33-34)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>There is no mention in this strategy of how TEA will work to reduce the number of inexperienced teachers.</p> <p>The SEA does not examine any data relevant to disproportionate rates of ineffective, out-of-field, or inexperienced teachers for low income and minority students.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA should describe the extent to which low-income or minority children in schools receiving Title I, Part A funds are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers and what measures are used to evaluate and report on this issue.</p>

#### **A.6: School Conditions (ESEA Section 1111(g)(1)(C))**

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
- Does the SEA’s description include how it will support LEAs to reduce incidences of bullying and harassment?
- Does the SEA’s description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?

- Does the SEA’s description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA offers general statements for the manner in which it will support LEAs receiving assistance under Title I, Part A to improve school conditions for safety. TEA addressed in the majority of their narrative strategies they were using to generally improve classroom discipline through the use of multi-tiered system of support and in building stronger relationships between students and adults. There was minimal and very general descriptions of the strategies they were using with special needs children to assist them in participating in the least restrictive environment. TEA offered no information about specific work being done to reduce incidences of bullying and harassment, of the overuse of discipline practices that remove students from the classroom and how they will work to reduce the use of aversive behavioral interventions that compromise student health and safety.</p> <p>The SEA describes two approaches—restorative discipline practices and positive behavior support systems (seemingly focused only on students with disabilities). The restorative discipline practices are geared toward all types of behavior management but does not specifically highlight bullying/harassment. The practices would be targeted at reducing discipline practices that remove students from the classroom—the initial focus was on districts that suspended a higher number of African Americans males. In general, the positive behavior support systems would be aimed at reducing any aversive behavioral interventions although that is not specifically stated. (p. 35)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>Description doesn’t directly target how to reduce bullying and harassment, overuse of discipline practices and use of aversive behavioral interventions.</p> <p>State could clarify how its statewide initiative will support LEAs receiving assistance under Title I Part A in particular (e.g. timeline, prioritization). State plan could also discuss how the initial training on restorative justice will result in improved outcomes (e.g. what implementation issues are likely to arise, how they will be addressed, and what outcomes, if any, the state has already seen given that a number of schools have already been trained).</p> <p>It is unclear how 20 education service centers will be able to serve the behavioral needs of the entire state.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA must describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning.</p> <p>TEA must more clearly describe which practices it will use to support LEAs in reducing incidences of bullying and harassment, and how it will allocate those resources.</p>



### A.7: School Transitions (ESEA 1111(g)(1)(D))

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?
- Does the SEA’s description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>State provides a general description of a variety of strategies to support meeting student needs, but these are not specific to the issue of transitions or dropout prevention. The SEA provides two avenues for supporting school transitions. The first is designed to help LEAs access resources and implement comprehensive needs assessments to maximize the use of these resources. The second avenue is related to improving instruction, accountability, parent support of instruction and innovative high school programs.</p> <p>TEA offers no information on how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>TEA did not provide information related to supporting effective school transitions to middle school and to high school.</p> <p>State plan in this area would be stronger if it described specifically how these supports are relevant to student transitions, dropout prevention, and are or can be targeted to LEAs receiving support under Title I, Part A.</p> <p>The SEA provides no data relative to cohort loss during key transition periods.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewers) <input checked="" type="checkbox"/> No (4 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>TEA should describe specifically what supports are relevant to student transitions, dropout prevention, and are or can be targeted to LEAs receiving support under Title 1 Part A. TEA should discuss how the comprehensive needs assessment queries areas related to transitions and dropout.</p>

## SECTION E: TITLE III, PART A, SUBPART 1: ENGLISH LANGUAGE ACQUISITION AND ENHANCEMENT

### E.1: Entrance and Exit Procedures (ESEA section 3113(b)(2))

- Does the SEA describe how it will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, a State will ensure that local input included in the exit procedures, such as teacher input or a portfolio, will be applied statewide?

- Does the SEA’s description include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>SEA’s entrance procedures include a Home Language Survey process to determine language classification and determine whether a bilingual or ESL program is warranted. HLS may be followed by an oral language proficiency test and ELA assessments from a norm-referenced standardized assessment. TEA states that all this is done within 20 days of enrollment. A local language proficiency assessment committee makes designation and placement decisions. Special procedures are in place for students with disabilities.</p> <p>SEA exit procedures are based on approved tests that measure oral and written language proficiency in English, performance on reading assessment in English, and criterion referenced assessments or teacher evaluation. Local committee designates proficiency level. Students who have exited are monitored during the first two years after exit; if student fails a grade in a foundational subject, local committee reevaluates to determine whether students should be reenrolled in bilingual or ESL program. (P.49-52)</p>
<i>Strengths</i>	<p>TEA has designed strong entrance and exit procedures for students utilizing objective assessments and data collection as well as educator evaluation at the end of each year. This educator panel also determines the student’s academic placement. There are procedures for SWD.</p> <p>SEA has very detailed entrance and exit procedures with local committees having critical roles in making designations and placements and reviewing progress.</p> <p>Assessment within 20 days of enrollment.</p> <p>State has detailed and clear entry and exit procedures and an assurance (based on state law) that new students are assessed.</p>
<i>Weaknesses</i>	<p>State plan could describe how these procedures were developed, and what stakeholders were involved in the process. There is no discussion of how the Language Proficiency committees make comparable decisions across the state.</p> <p>There is no discussion of standardization of criteria for exit based on teacher evaluation.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>Two reviewers felt that TEA must describe how it has consulted with LEAs representing the geographic diversity of the State, to establish standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, TEA has ensured that local input is included in the exit procedures, such as teacher input or a portfolio, has been applied statewide.</p>

## E.2: SEA Support for English Learner Progress (ESEA section 3113(b)(6))

- Does the SEA describe how it will assist eligible entities in meeting the State-designed long-term goal for English language proficiency established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goal, based on the State’s English language proficiency assessment under ESEA section 1111(b)(2)(G)?
- Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>TEA reports that each spring ELLs are assessed using the state’s TELPAS assessment. TEA holds each LEA receiving Title III funds responsible for the academic achievement and the state’s required participation rate.</p> <p>The next section (E.3) includes general information about technical assistance and PD for LEAs who don’t meet the achievement objectives. SEA is required to help LEA develop a plan and PD strategies.</p> <p>After four years without meeting objectives LEA may be required to modify curriculum or method of instruction or replace personnel. Education Service Centers receive supplemental Title III funding to provide direct technical assistance and PD. The Appendix does include expectations by 5 year cycle for English proficiency; students are assessed annually to determine progress. (P.52-53 and Appendix A)</p>
<i>Strengths</i>	
<i>Weaknesses</i>	State could add information in this section on how it will assist eligible entities in meeting the state-designed long term goals.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewers) <input type="checkbox"/> No (0 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

### **E.3: Monitoring and Technical Assistance (ESEA section 3113(b)(8))**

- Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency?
- Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	SEA conducts compliance reviews annually which sounds from description like a desk audit. The SEA provides for several levels of intervention when school doesn’t make progress in helping students achieve English proficiency. PD and TA are provided after two years of no progress; monitoring implementation and more PD if 3 years and 4 years brings stronger modifications to practices and personnel. The state plan does not specify the

	steps it will take if strategies are not effective. This is particularly important in light of the low performance of the EL subgroup for academic achievement and EL progress.
<i>Strengths</i>	TEA describes an overall program of Monitoring and TA for its LEAs in schools receiving Title III funds.  State has a staged approach to providing support and monitoring progress which begins with a plan development process.
<i>Weaknesses</i>	The state plan does not specify the steps it will take if strategies are not effective. This is particularly important in light of the low performance of the EL subgroup for academic achievement and EL progress.  Peers feel that four years is an extended interval with minimal progress before curriculum, instruction, and personnel are altered. This is especially true given expected interim benchmarks of only 2% increase over 5-year cycle.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewers) <input checked="" type="checkbox"/> No (2 peer reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Two reviewers felt that TEA should further describe the additional steps it will take to assist eligible entities if the strategies funded under Title III Part A are not effective, particularly with respect to past performance in academic achievement and EL progress for qualified students.