STATE PLAN PEER REVIEW CRITERIA Peer Review Notes Template

STATE: Arkansas



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; and3) 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 \S 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, ¹ does the SEA describe, regarding the 8th 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)?

	Peer Response
Peer Analysis	ADE does not utilize the 8 th grade math exception.
Strengths	
Weaknesses	
Did the SEA meet	☐Yes (0 peer reviewers)
all requirements?	□ No (0 peer reviewers)
	⊠ N/A (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

¹ In order for an SEA to exempt an 8^{th} grade student from the mathematics assessment typically administered in 8^{th} 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

- > 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?

	Peer Response
Peer Analysis	AR has enacted a law establishing English as the official instructional language of the state. Therefore, AR did not respond further to the elements in this section, including identifying specific languages that are present to a significant degree in the student population or the range of English learners in its student population. Based on this statutory prohibition, Arkansas does not have a threshold for
	defining other languages used by students.
Strengths	None identified
Weaknesses	Although Arkansas state law prevents instruction in any language other than English, this does not preclude Arkansas from adopting a definition which would identify those languages and meets the requirements of A.3.i nor does it provide the most common language other than English that is spoken.
Did the SEA meet	☐Yes (0 peer reviewers)
all requirements?	☑ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	ADE must provide a definition of languages other than English that are present to a significant extent in the participating student population. Additionally, it must identify the specific languages that meet that definition; include in the definition at least the most populous languages 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, 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; and in determining which languages are present to a significant extent in the participating student population, 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.

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?

Peer	Response

Peer Analysis	State law precludes instruction and assessment in any language other than English, therefore, no languages other than English are identified. Given that the State contends that its' English only statute prohibits assessments in languages other than English, AR does not provide assessments or instruction in languages other than English.
Strengths	
Weaknesses	The State does not provide assessments in languages other than English.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	Arkansas states that "no assessments were identified as needed at this time" but provides no supporting data or discussion to support this claim. Arkansas does not provide the definition of languages other than English present to a significant extent in the student population.
Strengths	
Weaknesses	The State does not identify the languages other than English that are present to a significant extent in its student population, nor does it appear to have any available assessments in other languages.
	Peers stated that there was no supporting data in regards to student population to support the State's claim (p. 8).
Did the SEA meet	☐ Yes (0 peer reviewers)
all requirements?	☑ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must identify 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.

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:
 - o 1) gather meaningful input on the need for assessments in languages other than English;
 - o 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?

Peer Response
ADE does not provide assessments or instruction in languages other than English as per state law. Therefore, ADE has no stated plans to develop assessments for languages other than English.
It is unclear in the Plan if ADE intends to make no or minimal effort to develop assessments. In order to arrive at that decision, the ADE gathered meaningful input on the need for assessments, collected and responded to public comment (which could be shared with lawmakers if a need is identified), and consulted with educators, parents, and families impacted by English-only laws and practices.
Arkansas assesses in the same manner its schools are required to instruct – English only.
Even if Arkansas cannot administer assessments, or instruction in any language other than English, the ADE plan makes no effort to assess the impact of these policies and whether any other supports might be available to English learner students and their families. Arkansas law does not prevent ADE from carrying out any efforts to develop assessments or strategies that would better support English learner students and the schools they attend.
☐ Yes (0 peer reviewers) ☐ No (4 peer reviewers)
The ADE must respond to the following: 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; 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 include the State's plan and timeline for developing such assessments; 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 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; and if applicable, 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 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.

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?

	Peer Response
Peer Analysis	ADE includes the following racial and ethnic student groups in its accountability system: African American, Hispanic, White, Economically Disadvantaged, English Learners, and Students with Disabilities (p. 17)
Strengths	
Weaknesses	
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	AR analyzed potential additional student subgroups and concluded that the student numbers were too low to warrant the additional student subgroups. Additional subgroups did not meet minimum N size for meaningful differentiation.
Strengths	The State indicates that in response to stakeholder concerns, students in Gifted and Talented programs will be added as well as separately identifying currently classified English Language Learners from former English Learners as separate subgroups to the annual reporting system.

	Disaggregation of current English learners only allows for better transparency and focused evaluation of the state's goals for English learners to achieve English language proficiency.
	AR details the multiple analyses used to determine the necessity and advisability for inclusion of additional subgroups. In addition, the state engaged stakeholders and its Technical Advisory Committee for Assessment and Accountability and Accountability System Steering Committee in making the final decision.
Weaknesses	While Figure G on p. 19 provides some basic information it does not include enough baseline information to indicate if the separation of the small number of 4 year former English Learners will be a meaningful subgroup. The distinction between the annual reporting system and the accountability system (p.18) was not clear.
Did the SEA meet all requirements?	
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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.din 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)?

	Peer Response
Peer Analysis	Not applicable.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☐ No (0 peer reviewers)
	⊠ N/A (4 peer reviewers)
If no, describe the specific information	

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

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?

	Peer Response
Peer Analysis	Arkansas proposes a positive step to decrease its minimum N-Size from 25 to 15. This will result in more schools reporting results for more subgroups. Tables 4 and 5 provide useful data on the impact of this decision (p.20). Based on the data in Table 4, the inclusion of more schools in the State's accountability system will result in a more robust picture of school and student progress. For example, the % of schools with English Learners will increase from 28.9 % to 40.6%.
Strengths	A minimum n-size of 15 provides for greater transparency and accountability for a greater number of students and schools than would be provided by the prior minimum n-size of 25.
Weaknesses	It is unclear if the English Learner subgroup in Tables D-1, and throughout, consists of students who are former English learners or just the current English learners discussed previously in regards to additional subgroups (p. 121).
Did the SEA meet all requirements?	 ⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?²

	Peer Response
Peer Analysis	AR presents their statistical rationale for their proposed minimum N-Size. It is consistently sound and aligned with their Educational Support and Accountability System. The chart on p. 119 demonstrates why the State did not reduce the N-Size further.
	The selected n-size captures more students and schools than Arkansas' previous accountability system. While Arkansas describes why this new minimum n-size should be considered appropriate for applied use in the accountability system, it does not provide any additional data to demonstrate whether school accountability labels will decrease in their reliability as a result of using a smaller n-size.
Strengths	The State provides extensive data tables in Appendix D to support its decision to reduce the N-Size to no lower than 15. It further provides a rationale for using weighted averages for two or more years to increase the reliability of the School Index. (p. 22)
	Arkansas reiterates the importance of using multiple measures and the context of accountability determinations as a whole in evaluating its minimum n-size as statistically sound. In addition, Arkansas noted the various considerations surrounding the determination of the minimum N-size, including the maximum inclusion for equity. Arkansas will monitor the impact of its new minimum N-size for consistency and reliability in determining underperformance of student groups.
Weaknesses	While it is necessary to know how this minimum n-size will effectively capture students statewide as well as the schools serving these students, for the purposes of evaluating statistical soundness, it would be helpful to understand the typical subgroup size within Arkansas schools and to what extent those subgroup sizes vary (mean and standard deviation) by each grade level.
	ADE proposes to monitor classification consistency (p. 22) annually in order to assess the impact of reducing the minimum n-size by 10. Peer reviewers noted, however, using new accountability measures, new student performance data, and new expectations for schools can lead to meaningful changes in

² Consistent with ESEA section1111(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.

	school classifications.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully	
meet this	
requirement	

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?

	Peer Response
Peer Analysis	The ADE provides a thorough discussion of its consultation process with Stakeholders and Advisory Teams as it developed the plan to ensure that the decision on the minimum N-Size reflected the priorities of equity and practicality. The process appears to be data driven at both the school and district level as evidenced by the impact charts and graphs included in Appendix D (p. 22)
Strengths	AR sought and received broad input from various constituencies with extensive briefings with stakeholders as well as follow-up webinars to discuss minimum N-Size issues (Appendix D). The data shared with stakeholder groups and Advisory Teams indicate a high level of collaboration and informed decision making as well as thoughtful deliberation on the multiple implications associated with various n-sizes.
Weaknesses	It should be noted that the survey the State cites indicates 26 respondents without providing the response rate. This is a relatively small number given the number of collaborations cited in the plan.
Did the SEA meet all requirements?	 ⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?³

	Peer Response
Peer Analysis	Arkansas utilizes a cell-size limit of 10 (p. 23) in redacting data to protect student privacy and confidentiality. The state uses additional methods such as complementary suppression, limited access, and encryption with small student numbers. Hierarchical permissioning and confidentiality agreements further provide appropriate access to student performance information for educational purposes.
Strengths	The state employs a multi-tiered approach for protecting student data.
Weaknesses	The blanket use of "various suppression/limited access methods" may be insufficient to protect all students (p.23).
Did the SEA meet all requirements?	 ⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	AR's minimum number of students for reporting (10) is lower than the minimum of students for accountability (15). These established minimums are clearly consistent with ESEA requirements and are statistically reliable. Also, they are consistent with best practices.
	The state should consider greater clarity in its public reporting practices when a school has 10 or more students for the purposes of reporting but less than 15

³ See footnote 5 above for further guidance.

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	full academic year students for evaluating the school on specific accountability metrics (p. 23).
Strengths	A smaller n-count for reporting vs. accountability will allow for increased public transparency.
Weaknesses	
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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 time line the same multi-year length of time for all students and for each subgroup of students?
- > Are the long-term goals ambitious?

	Peer Response
Peer Analysis	Arkansas aims to achieve a goal of 80 percent proficiency within 12 years (p. 12). Arkansas expects that 4 in 5 students will be proficient in 12 years describing the goal as "congruent with broader initiatives that build the capacity of LEAs" (p. 26). The state's baseline data describes the proficiency rates of schools at the 25 th , 50 th , and 75 th percentiles. For a certain percentage
	of schools in Arkansas, 80 percent proficiency within 12 years may not be ambitious. Without baseline data, it's not possible to evaluate these goals in relation to the achievement of subgroups statewide. The timeline seems to be consistently applied; however, it's not clear how those baselines and improvement rates by quartile would be applied to all schools.
	Below are some questions for the ADE to consider: • Are schools supposed to be meeting the target for the nearest quartile or their own unique improvement goal to achieve 80% proficiency by 2029? • It is also not clear how the 257 unique configurations Arkansas cites would be factored into schools that may fall outside the three models

	established or whether these three models actually apply to student- level baseline and goals. For example, does a 4-6 grade school at the 25 th percentile need to meet the 25 th percentile goal or do students in grades 4 and 5 need to meet the K-5 goal while grade 6 is expected to
Strengths	meet the 6-8 goals? The peers were split on this requirement. One peer determined that the State did provide baseline data, describing school performance by quartile and by providing the statewide distribution on p. 26. ADE recognizes the unique configurations of schools throughout its state and
Strengths	makes an effort to account for the differentiation in its goalsetting.
Weaknesses	It is concerning that Arkansas views the achievement of all students as an impossible task on par with creating enough jobs for its workforce. The expectation that all students achieve grade-level proficiency can spur economic and education conditions to create enough jobs available for all individual job-seekers (who would rely on adequate secondary education to qualify for many of the entry-level positions in today's workforce).
	It is unclear what percentage of schools (if any) and which subgroups (if any) are currently meeting the long-term goal of 80% proficiency. This information is necessary for evaluating whether the state's identified goal is ambitious relative to the performance of all students and each subgroup of students.
	There are numerous unexplained assumptions within the State's goal setting process, which raise serious questions about its commitment to meet the challenging college and career ready standards it describes in the introduction to this Plan. For example, a twelve year time line assumes that Arkansas students are a stable population for entry in Kindergarten to 12 th grade graduation. There are no data presented to support that assumption. In addition, the manner in which the percentile of schools are presented assumes that each group is proportionally equal.
Did the SEA meet	⊠Yes (1 peer reviewer)
all requirements?	⊠ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this	The ADE must identify and describe long-term goals for each subgroup of students, describe baseline data for each subgroup of students, and describe multi-year timelines for meeting the long-term goals for each subgroup.

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requirement

- 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?

	Peer Response
Peer Analysis	The ADE provides adequate measurements of interim progress toward
	meeting the long-term goals for all students. However, the measurements of

	interim progress toward meeting the long-term goals for each subgroup of students is not evident in the plan. The State uses previous years of performance data (SYs 2005-2013) to set measures of interim progress for percentile of schools, not subgroups. The State's assumption that subgroup performance will be equal to (or conform to) the rate of change within the school as a whole is not supported (p. 26) by the annual rate of change needed as presented in Table A-3 on p. 109-110.
	There was disagreement among the peers in the panel. One peer states Appendix A identifies the measurements of interim progress toward meeting the long-term goals for all students and aims to use these goals to apply to each subgroup of students as well.
Strengths	The ADE uses past performance to set interim progress goals for English Language Arts and Mathematics through 2029. The three-year intervals for the interim checkpoints recognize that progress toward rigorous standards may take time and that schools need to implement sustainable improvements. The State outlines equitable expectations for all students regardless of subgroup status.
Weaknesses	The ADE should increase transparency by providing disaggregated subgroup data.
Did the SEA meet all requirements?	⊠Yes (1 peer reviewer)⊠ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must identify and describe measurements of interim progress toward meeting the long-term goals for each subgroup of students.

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?

	Peer Response
Peer Analysis	Schools may meet interim progress and long-term goals if 80% or more of their students achieve proficiency over the next 12 years. However, it is fully possible for the other 20% of non-proficient students in a school to represent a subgroup with consistently lower achievement rates at the school level and statewide. Individual schools and even Arkansas as a state may achieve 80% proficiency in 12 years while gaps continue to widen unchecked throughout that time. (p.26)
	The State provided an annual rate of change calculations for percentile of schools (i.e.75 th , 50 th , and 25 th) that indicate a substantial rate of change for the lowest performing schools. However, there is no baseline data for which to make a determination nor are subgroups of students represented in the change

	calculations. (pp.107-108)
	There was disagreement among the peers. One peer indicated that the ADE did recognize that student subgroups that start at a lower baseline will need to make more progress toward achieving the long-term goals.
Strengths	The ADE is planning transparent reporting and visualization that will clearly indicate how subgroups of students are progressing in closing the gaps toward long-term goals.
Weaknesses	Subgroups of students are not specifically included in the rate of change projections. There is very little information to suggest that the ADE will meaningfully
	track and incentivize schools to close achievement gaps.
Did the SEA meet all requirements?	⊠Yes (1 peer reviewers)⋈ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet	The ADE must identify and describe measurements of interim progress toward meeting the long-term goals for each subgroup of students rather than checkpoints to gauge interim progress based on school percentiles (p. 109-110).
this requirement	The ADE must also describe the improvements necessary to enable subgroups of students who are behind in reaching the long term goals to make significant progress to close statewide proficiency 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?

	Peer Response
Peer Analysis	The ADE established long-term goals for the four-year adjusted cohort graduation rate for all students. Specifically, their description includes baseline data and multi-year timelines for meeting long-term goals for all students. However, the ADE does not identify and describe the long-term graduation rate goals for each subgroup of students, nor does it provide baseline data for subgroups. (p. 112)
	Some peers indicated that the peers cannot determine if the long-term goals are ambitious if there are no baseline data. One peer believes the 94% long-term goal proposed by the State is ambitious, however another reviewer believes this figure to be maintenance for some schools, and ambitious for other schools.

	It is not clear if the ADE's baseline data reflects the state's graduation rate of all students. It is unclear what percentage of the students in Arkansas graduate within four years. Arkansas provides the graduation rates at the 25 th , 50 th , and 75 th percentiles. However, these data only reflect the typical graduation rates at various types of schools within the state rather than actual graduation rates statewide.
Strengths	The ADE sets a four-year adjusted cohort graduation rate for all students based on school percentile rankings with an expectation that the rate will range from 94% to 83% based on the school ranking.
Weaknesses	The State does not set graduation rates for subgroups of students. The expectation that LEAs and schools will independently place individual students or subgroups on the percentile rankings and growth projections is unrealistic.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☐ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must	The ADE must identify and describe the long-term goals for the four-year adjusted cohort graduation rate for each subgroup of students. Percentile of schools versus student data is presented. Grad. Rate should be
provide to fully meet this requirement	percentage of students not percentile of schools. In addition, ADE's description must include baseline data for all students and each subgroup of students.
	ADE must also provide the timeline for each subgroup of students to meet the long-term goals for the four-year adjusted cohort graduation rate.

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?

	Peer Response
Peer Analysis	Arkansas sets a five year adjusted cohort graduation rate at 97%, however Table 9 does not reflect that goal setting (p. 27). The distribution of percentile
	schools in Table 9 shows a range of 94% to 97% which appears to be less rigorous than the four year adjusted cohort graduation rate. The lack of baseline data raises concerns about how ambitious this rate is compared to the four-year adjusted cohort graduation rate.

Strengths	The 97% rate is aspirational.			
	Arkansas expects to increase the percentage of high school graduates over the four-year graduation expectation.			
Weaknesses	Supporting data is both limited due to lack of baseline data.			
Did the SEA meet all requirements?	☐Yes (0 peer reviewers) ☐ No (4 peer reviewers)			
If no, describe the specific information or clarification that	The ADE must identify and describe the long-term goals for each extended- year adjusted cohort graduation rate for each subgroup of students.			
an SEA must provide to fully meet this requirement	In addition, the ADE must include baseline data for all students and for each subgroup of students, as well as the timeline for each subgroup of students.			

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?

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	Peer Response
Peer Analysis	The State provides adequate measurements of interim progress towards meeting the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students. However, this information is not evident for each subgroup of students. In addition, the ADE does not provide projections for subgroups of students nor does it provide complete data on the make-up of the percentile schools upon which its goals and projections are based.
	ADE's plan suggests that all students and each subgroup of students will share the same graduation goals and measurements of interim progress. Schools would have to calculate their interim progress target based on the difference between their baseline graduation rate and the long-term graduation goal divided by 12. The annual rate required would be assessed in aggregate every three years throughout the 12 year period (p.115).
	There is a disagreement among the peers. Two peers indicated that the plan provides data for all students and percentiles of schools, which they assume covers the subgroups of students.
Strengths	The State provides checkpoints to meet the long term goal of 80%. Timeline for interim progress targets allow for close monitoring of graduation rates while three years between monitoring allows for enough time for intervention efforts to impact outcomes before pivoting with new efforts if necessary.
Weaknesses	Subgroup projections are lacking.

	If table A-6 on p.116 reflects an actuality among the State's schools' graduation rates, approximately 25% of schools are not expected to improve graduation rates over the next 12 years.
Did the SEA meet all requirements?	 ⊠Yes (2 peer reviewers) ⊠ No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate, and for any extended-year adjusted cohort graduation rate for each subgroup of students.

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?

	Peer Response
Peer Analysis	If each subgroup is expected to meet the long-term 4-year graduation goal of 94% or 97% for 5-year graduation, all subgroups and all students would achieve a graduation rate of 94% or higher. These high expectations applied to all students and each subgroup of students is not made explicit based on the baseline data and lack of subgroup metrics.
	There is disagreement among the peers. Some peers indicate that the goals take into account the rate of improvement for all students, regardless of their baseline data.
Strengths	
Weaknesses	Subgroup projections are lacking.
Did the SEA meet all requirements?	 ⊠Yes (2 peer reviewers) ⊠ No (2 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must 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.

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?

	Peer Response
Peer Analysis	The state acknowledges that the timing of changing English language proficiency assessments limits data to be used to inform the establishment of long-term goals and interim progress checks. Baseline data for only one year is currently available and so Arkansas requests a transitional approach with reevaluation occurring in future years. The plan seems reasonable given where the state is with its transition to a different assessment. The State intends to analyze the new assessment data on a continuing basis prior to establishing long term goals. (p.28)
	The ADE proposed in its plan an expected timeline to proficiency that takes into account initial English Language Proficiency levels that is differentiated by initial grade level spans. The plan is detailed in tables 11a, 11b, and 11c. (pp. 30-31)
	The State's long-term goal for EL students on-track to attaining English language proficiency is 52%. The state's baseline data combines 2016 and 2017 data for a rate of 32%. For each grade band, students have time to move through ELPA21 performance levels giving some students up to eight years to achieve EL Proficiency.
Strengths	Arkansas provides a long-term goal of English language proficiency.
	Expectations for EL proficiency are set for K-2 grades as well. EL students identified at a higher level are expected to reclassify more quickly.
	The plan cites national research on the time to language proficiency for English learners.
Weaknesses	High school students initially identified at a Lower level may not achieve EL proficiency within their free and appropriate public education timeframe.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet this requirement	
inis requirement	

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?

	Peer Response		
Peer Analysis	The ADE provides adequate measurements of interim progress toward		
	meeting the long-term goal for increasing the percentage of English learners		

	making progress in achieving English language proficiency.
	It's not completely clear in Table A-9 (p. 113) since the school at the 25 th percentile shares a baseline rate (32%) with the entire state as indicated in Table A-8. If this is in fact the case, the ADE implied measures of interim progress require one-fourth of the 12 year goal to be attained every three years.
	The state provides interim progress checkpoints.
Strengths	
Weaknesses	If a school at the 25 th percentile (p. 114, table A-9) shares the State's EL progress rate (p. 114, Table A-8), this indicates a much larger number of schools with EL progress rates less than 32%. The state should take necessary measures to ensure the effectiveness of the EL supports available and implemented.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	ADE will utilize a "non-compensatory weighted achievement calculation". Like
	the state's long-term achievement goal, this indicator utilizes the state

assessment as well. The indicator can be disaggregated by subgroup. However, the academic achievement indicators account for students below grade-level by assigning partial credit for partial proficiency and allows for additional credit for the difference in the number of students' exceeding standards and at the lowest performance level. This severely complicates the achievement indicator and deviates from the state's long-term achievement goal for 80% of students to meet or exceed state standards. In the example below (and assuming students in each year are the same which is also unlikely), the school increases proficiency rate in year 2 and gets closer to the state's goal of 80% but earns even less points than what the school earned in Year 1. By Year 3, the percentage of students proficient in Year 3 actually decreases, but the school earns even more points than prior years. This is despite the number of students decreasing from proficient to "close" and no students improving from Proficient to Highly proficient.

Value	Year 1	Year 2	Year 3
0	5	10	0
0.5	10	0	20
1	15	15	5
1.25	10	15	15
Points %	0.78125	0.78125	0.84375
Proficient	0.625	0.75	0.5

Also, ADE references the intention to credit schools for students increasing performance levels each year. However, the achievement calculation is not a growth calculation nor is the state's long-term goal for achievement. Year 1, 2, and 3 above could easily be used to compare three different schools in which case the points award further complicate the ability to differentiate among schools. Although traditional growth measures should allow schools to earn points for students' academic growth, the academic achievement indicator does not inherently incent schools for improving students' academic achievement. For example, a high school which tests in one single grade could improve its annual achievement points based on a different cohort of students (and their respective distribution of proficiency levels) each year.

	School	School	School
Value	A	В	C
0	5	10	0
0.5	10	0	20
1	15	15	5
1.25	10	15	15
Points	0.78125	0.78125	0.84375
%			
Proficient	0.625	0.75	0.5

Assuming a discrepancy in table 12 indicating the points earned for L4 students =5.5 - not 5.75 (the correct value indicated in the subsequent column), Arkansas seems to aggregate both ELA and Mathematics results in the achievement indicator calculation. Therefore, the weight of ELA to

	mathematics will vary from school to school based on the total number of records within each subject. Arkansas suggests it will calculate the achievement index score so schools earn "the proportion of points earned by a school based on the number of full-academic year students tested at the school" (p. 34) suggesting that the state may NOT include the performance of at least 95% of students. The current "non-compensatory" calculation still allows for some compensation by allowing schools with smaller numbers of students in the lowest performance level and larger numbers in the upper performance bands to earn more points.
	Arkansas intends to use the same weighted achievement level calculation across all schools, grades levels, and its English language arts and mathematics assessments. The State's rationale for adopting this approach is to reward schools for moving additional lower achieving students to grade level proficiency. Table 12 shows a three year hypothetical growth path for a group of students in the same school that does indicate student achievement increasing across all levels but also shows some students staying at the "need of support" level. The lack of a clearly identified and specific academic achievement indicator on pages 33-35, it is difficult to determine if the State's Plan meets this requirement.
Strengths	Some peers felt that the State provides extensive calculations for this approach to demonstrate its reliability and validity. In addition, it discusses how the approach is aligned with long-term goals and can be disaggregated for each subgroup.
Weaknesses	Table 13 on p. 35 includes weighted achievement statistics for student subgroups with relatively high standard deviations for Black/African American, Hispanic/Latino/a, and English Learners which may impact the reliability of the growth pattern for these students. It is not clear if 95% of all students and 95% of students in each subgroup will be tested.
Did the SEA meet	☐Yes (0 peer reviewers)
all requirements?	☑ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this	The ADE must provide additional information on the alignment of the State's long term goals with the academic achievement indicator as well as a description of the validity and reliability of the academic achievement indicator, for example, but not limited to, the ADE could demonstrate that schools that receive more points under its proposed calculation would be increasing the percentage of students scoring proficient or above.
requirement	The ADE must also clarify if the indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup.

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?

	Peer Response
Peer Analysis	The ADE describes their value-added model, which compares actual to predicted scores and transforms schools' average growth scores allowing the school to earn points. The state does not average data across years in the growth model except to calculate individual growth scores for students. Data provided in Table 14 (p. 38) demonstrates the indicator can be disaggregated for subgroups but also implies possible issues with whether Arkansas' methodology to calculate VAS meaningfully differentiates among schools in their performance.
	The student growth indicator is used and calculated the same way for all elementary and secondary schools regardless of grade span. Furthermore, the State applies a uniform averaging procedure across all schools and the indicator can be disaggregated for each subgroup of students.
	The ADE clearly outlines the measurement of student longitudinal growth through a value-added model. This model examines student growth relative to individual student score history and expected growth.
Strengths	The State has studied the different models and provides extensive justification for a simple value added model. Table 14 on p.37 indicates reasonable, and consistent, standard deviations for student sub groups that support the reliability of the measure.
	The ADE has taken a mindful approach to select a growth model despite the challenges posed by a new state assessment for three consecutive years.
Weaknesses	The state acknowledges that it is not clear how it will fully implement this model given its change in assessments over the past three years. It is unclear if its calculations will account for the lack of a clear pattern of growth thus the stability of the value added calculation may be called into question.
	Normative methodology can mask a lack of meaningful improvement and progress in closing achievement gaps among groups of students. Data demonstrating the typical growth and achievement of students at schools which earn high growth scores compared to the typical growth and achievement of students at schools which earn low growth scores would better clarify how well this indicator meaningfully differentiates school performance.

Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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?

	Peer Response
Peer Analysis	The ADE intends to use a simple weighted calculation for the four and five year adjusted cohort rate across all high schools. Both the four-year and five-year Adjusted Cohort Graduation Rate will be directly integrated into the ESSA School Index by multiplying each rate by the weight assigned: 10 percent for four-year Adjusted Cohort Graduation Rate and five percent for five-year Adjusted Cohort Graduation Rate. The indicator can be disaggregated for each subgroup.
Strengths	The calculation for this indicator gives greater weight/value to the four-year adjusted cohort graduation rate, encouraging on-time graduation. In addition, the weighting is clear and the calculation will be consistent across all schools.
Weaknesses	The State does not address the use of alternative assessments and any adjusted rates for students with the most significant cognitive disabilities. The description of the rate only indicates the points to be added when a satisfactory rate is achieved without discussing the impact of not meeting the graduation goal.
Did the SEA meet	⊠Yes (4 peer reviewers)

all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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 Statedetermined 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?

	Peer Response
Peer Analysis	The State requests a transitional approach with reevaluation occurring in future years, given its limited assessments data. It proposes to use a value-added growth model, which takes into account prior score history in establishing expected growth. Since the State has not made a final decision on the English Language Proficiency indicator it will use in their state-wide accountability system (pp. 37-39), some possible options are identified in the Plan.
	ADE describes a Progress in Achieving EL proficiency indicator; however, it is not aligned with the indicator described in A.4.iii.c.1. It is not clear if the indicator is valid or reliable since ADE describes multiple limitations to data availability in its previous narrative on A.4.iii.c.1. VAM typically requires a large amount of data for statistical modeling; however, it is unclear whether Arkansas' EL testing population or EL testing history supports the assumptions required of a VAM model. The EL proficiency indicator – as applied here – establishes variable expectations for students' EL progress based on their performance history and the performance of similar students rather than the state's performance levels adopted in its ELPA21 assessment.
Strengths	The State proposes a value added measure as a transition to a more robust measure on English language acquisition.
Weaknesses	The value added model is overly simplistic and may leave these students unaccounted for in statewide accountability system.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☑ No (4 peer reviewers)
If no, describe the specific information	As the ADE develops and tests an English Language Proficiency measure, it must ensure that indicator is aligned with the State-determined timeline

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

described in A.4.iii.c.1. The ADE must also provide a detailed timeline for completion of the indicator

In addition, ADE's description must include the State's definition of English language proficiency, based on the State English language proficiency assessment.

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?

	Peer Response
Peer Analysis	The State describes three sets of indicators it intends to use, pilot, and or develop to measure school quality and student success (pp. 39-42). Fifteen of the thirty-three indicators have data available, eight are to be piloted, and ten may be included at a later date. This is a very complex set of indicators with varying degrees of importance that may not lead to any meaningful understanding of school quality or student success when taken as a whole. For example, the list includes reading achievement at all grade levels, foreign language credits, and student leadership activities. It is understood that indicators will carry different weights; however, the system could quickly become overburdened. (p. 40)
	Given the tentative nature of the 18 "future" indicators, it is not possible to draw specific conclusions about their eventual usefulness or to analyze adherence to these requirements.
	The four specific indicators that apply across all grade spans: student engagement as measured by absenteeism, science achievement, science growth, and reading at grade level; are not differentiated in terms of importance with each receiving a possible score of 1 point. (p.41)
	Of the seven specific indicators that apply only to high school students: two apply to all students, GPA above 2.8 and on-time course completion. The other indicators relate to IB and AP courses, community service, WorkKeys, and/or computer science courses. The State does not differentiate among these

	indicators in terms of importance with each receiving a possible score of 1 point. (p. 41)
	Table 15 (p. 42) illustrates multiple opportunities for schools serving multiple grade spans to earn points. Although each of these measures would be systematically applied to the appropriate grade configuration of schools so the calculation remains consistent, higher levels of subjectivity remain with indicators such as GPA and credits earned.
Strengths	The list of indicators includes recommendations from stakeholder groups which may ensure commitment to using the data for student and school improvement purposes. The indicators are student based enabling subgroup disaggregation.
	Distribution of scores provided on p. 140 was very helpful (although histograms on p.140 were not labeled so there was some need to assume each of the histograms represented the grade bands from the prior page) and indicates a moderate amount of variation across SQSS scores.
Weaknesses	There is little differentiation among and between indicators.
	Although each of these measures would be systematically applied to schools so the calculation remains consistent, higher levels of subjectivity remain with indicators such as GPA and credits earned. Like many of the indicators used especially in high school, these two indicators are a function of each other which might explain the bimodal distribution of SQSS points for high school grades. That is, schools where students have high GPAs will also have earned credit. Those schools where students fail classes and fail to earn credit will continue to have low GPAs.
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The State intends to differentiate school and student performance using an
-	index with the addition of other measures, i.e. student progress toward long

	term goals, to help schools better understand their progress. (p. 42) The school index will include school growth (50%/35%), weighted achievement (35%), adjusted cohort graduation rates (15%), and school quality and student success rates (15%). The index includes differing percentages for high schools that reflect the inclusion of graduation rates by lowering the growth rate. The plan to use growth as the dominant indicator has the potential to minimize student achievement. While students and schools are expected to show growth commensurate with time, the goal of increased student achievement is ultimately more important.
	The State also proposes to make English Language Progress a proportional part of the growth indicator which may be useful to schools and students but it may also hide student achievement. Although the proposed methodology allows Arkansas to include EL progress at a weight proportional to the size of the student group, this is problematic for meeting the requirement to include specific indicators (not combined) bearing substantial weight individually.
Strengths	Arkansas is very responsive to the expressed concerns of stakeholders and clearly understands the needs and wants of school personnel. This may help school's understand and use the annual data.
Weaknesses	The growth model is dependent on five years of data which the State may have difficulties providing given the change in assessments and standards. While it does acknowledge this issue (p.44), the eventual score may come with so many caveats to make it meaningless.
	It is unclear if the phrase "their student groups' progress" means the inclusion of all subgroups.
	Since AR is still finalizing specific indicators they will use in their accountability system, analyzing adherence to these criteria is not possible at this time.
Did the SEA meet all requirements?	☐ Yes (0 peer reviewers) ☐ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must	ADE must describe how its system of annual meaningful differentiation includes the performance of each subgroup of students on each of the indicators in the State's accountability system.
provide to fully meet this requirement	In addition, English language proficiency must be included in the State's accountability system as a separate indicator.

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?

	Peer Response
Peer Analysis	The State adequately describes the weight of each indicator including a provision for English Learners in the growth rate which is the major percentage indicator. The weights for each indicator represent the State's articulated belief in growth over time rather than an absolute achievement benchmark. The school quality/student success indicator remains at 15% for elementary/middle schools and high schools providing for a constant 85% for other indicators of growth, achievement, and graduation rates. The ADE describes its weighting for both high schools and schools with grades eight and below. In the aggregate, all indicators excluding SQSS account for 85% of school index scores. As noted previously, the State does not assign a fixed weight to EL progress indicator instead choosing to combine EL growth scores with content growth scores. The plan clearly indicates that Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive substantial weight individually and that these indicators have much greater weight than the School Quality and Student Success
Strengths	indicators. Small N-size cases are also discussed. English Language Progress is statistically adjusted in the growth indicator to reflect the number of English learners in a school. In Table 17 on p. 45, the population density of English Learners is presented as a percentage of schools to support the proposed model.
Weaknesses	It is not clear in the Plan if ADE is still finalizing specific indicators it will use in its accountability system and how any possible changes may impact the weighting of indicators.
Did the SEA meet all requirements?	 ⊠Yes (3 peer reviewers) ⊠ No (1 peer reviewer)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must ensure that English Language proficiency indicator has a substantial weight individually.

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.aof 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?

	Peer Response
Peer Analysis	The ADE will assign schools without an accountability determination the

	rating of the school in which its students feed. It is not explicitly stated, but it's assumed that comprehensive/targeted identification would be based on these duplicated ratings. The type of schools to which this methodology applies broadly includes any school for which an accountability determination cannot be made, but K-2 readiness measures are cited as a possible component for inclusion indicating these schools serve elementary grades.
	In addition, the State proposes to use feeder school pairings when an accountability determination cannot be made (p.47).
Strengths	At some point, the ADE will pilot K-2 reading readiness measures to include in unrated feeder schools' annual accountability determination data.
Weaknesses	Since the State is still finalizing specific indicators they will use in their accountability system, analyzing adherence to these criteria may need to be revisited at a later date.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	The State will identify the lowest 5% of School Index Scores within elementary, middle, and high school grades resulting in at least 5% of the lowest performing schools in those grade spans being identified. These schools will be identified at the start of the 2018-2019 school year and every three years thereafter.
	This is an acceptable methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds for comprehensive support and improvement. The State also identifies the year in which school identification will begin and the timeline for future identification of schools. All components of its proposal are acceptable (p.47).

Strengths	The State will use this identification beginning with the 2018-2019 school year.
	The State adequately describes its methodology to identify the lowest- performing 5% of schools using the ESSA School Index which will be used across all schools with similar grade spans.
Weaknesses	
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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)?

	Peer Response
Peer Analysis	The ADE will begin identifying high schools with a graduation rate of less
	than 66.667 percent for the Comprehensive Support and Improvement
	category for the 2018–2019 school year and every year thereafter.
Strengths	High schools with low graduation rates would be identified for support as quickly as possible.
Weaknesses	It is not clear based on the narrative regarding the identification of schools and the rates that would be averaged to calculate an "average Adjusted Cohort Graduation Rate."
	While the State may meet the legal requirements, essential information appears to be lacking for this indicator, e.g. methodology and years used to compute the average (p.48).
Did the SEA meet	☐ Yes (0 peer reviewers)
all requirements?	☑ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must clarify if the adjusted cohort graduation rate is based on a single year or an average of the graduation rate over multiple years.

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)?

	Peer Response
Peer Analysis	Schools receiving additional targeted support with exceptionally low subgroup performance would enter into comprehensive support status if growth and achievement data suggest a need to do so. It is not explicitly clear if the achievement and growth data of the low-performing subgroup previously identified would be evaluated on its own for comprehensive support identification. Arkansas will evaluate these identified schools, but the plan suggests these schools will only be "considered" for identification. Criteria for escalating schools from additional targeted support schools to comprehensive support schools are unclear. The timeline for identification is clear with schools receiving notification after the initial ESSA school index scores are calculated and then evaluated for identification in 2021-2022 (p.48).
Strengths	The State has articulated its identification methodology for Title I schools in need of Comprehensive Support and Improvement which will be used in the 2018-2019 school year and every three years thereafter. High Schools with a graduation rate of less than 66.667 will be identified in 2018-2019 and every year thereafter.
Weaknesses	Information included in this section is not clear and is too general to evaluate critically.
Did the SEA meet all requirements?	☐Yes (0 peer reviewers) ☐ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must	The ADE must identify how schools receiving additional support for any number of years will be exited from this status or identified for more intensive comprehensive support.
provide to fully meet this requirement	In addition, ADE must clarify the methodology to be used to identify subgroup performance and how it will be used to identify schools in need of Comprehensive Support and Improvement.

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?

	Peer Response
Peer Analysis	The State will identify comprehensive support lowest performing and

	comprehensive support additional targeted support school every three years after the first year of identification while identifying low graduation rate schools annually.
Strengths	The State has articulated its identification methodology for Title I schools in need of Comprehensive Support and Improvement which will be used in the 2018-2019 school year and every three years thereafter. High Schools with a graduation rate of less than 66.667 will be identified in 2018-2019 and every year thereafter.
Weaknesses	
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	ADE will calculate a school index score for each subgroup within a school which meets the minimum n-size; however, this criteria does not appear to trigger notification to LEAs until 2020-2021. The plan does not describe how this score will be used to identify "consistently underperforming" subgroups or the definition of "consistently underperforming" (i.e. subgroup index score in lowest 5%, lower than all students group, and/or within school achievement gap increase). The identification cycle appears overly long to notify a school of its status.
	While AR describes their definition of consistently underperforming schools and their methodology for identifying schools with one or more consistently underperforming subgroups of students, it is difficult to determine if their methodology is based on all indicators resulting in annual meaningful differentiation (pp.49-50)
	Schools have two years to reduce either the "magnitude" or the "effect size" before notification. The page 50 narrative suggests that the State will allow two years for schools to improve before ADE provides "notification to LEAs of schools with consistently underperforming subgroups."

Strengths	The State will provide LEAs with additional analyses for the magnitude of the gap size for subgroups to provide statistically sound practices. Two years of data from the new assessment system will better support the State, LEAs, and schools.
Weaknesses	The State does not plan to assess the findings from ESSA School Index with previous results to see if the new system is robust and rigorous.
Did the SEA meet	⊠Yes (1 peer reviewer)
all requirements?	⊠ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must	The ADE must describe its methodology to identify schools with one or more "consistently underperforming" subgroups of students, including its definition of "consistently underperforming."
provide to fully	The ADE must describe how the school index scores will be used to identify
meet this	"consistently underperforming subgroups". The State must implement a
requirement	timeline which allows for annual identification of these subgroups before
	eventual identification for other, more intensive supports. The methodology
	for identification must align with school index scores.

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?

	Peer Response
Peer Analysis	The State will use the ESSA School Index annually for each subgroup within a school that meets the minimum N size beginning in the 2018-2019 school year. The ADE will identify subgroups with performance index scores in the lowest 5% annually beginning in the 2018-2019 school year (if based on 2017-2018 data, this would meet ESSA Special Rule). (p.50)
Strengths	The state specifies that identification will begin in 2018-2019. All of the bullets in this element are adequately addressed.
Weaknesses	
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet	

this requirement		

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?

	Peer Response
Peer Analysis	The State identifies the "Additional" comprehensive and targeted categories for non-Title I schools meeting the criteria outlined and applied to Title I
	schools, i.e. not meeting the exit criteria within a three-year period. (p.50)
Strengths	The State adequately describes how it meets this optional requirement.
Weaknesses	
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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)?

	Peer Response
Peer Analysis	The State will use 95% as the denominator for measuring, calculating, and reporting in the state accountability system for schools that do not meet the required participation rate. 95% will also be the denominator for subgroup calculations that meet the minimum size but not the participation rate requirement. (p.50)
	For schools not meeting 95-percent participation two years in a row, the State requires a school plan for meeting participation requirements. Without improvement in meeting that rate, the state will implement additional actions and interventions but does not specify what those are.
Strengths	The 95% denominator will serve as an incentive to meet the participation rate requirement.
Weaknesses	ADE's plan to request schools not meeting the participation to submit a plan lacks specificity. In addition, it is not clear if the State has communicated the possible sanctions to those schools that do not meet the participation rate after two or more years. This information should be known to the schools and LEAs.

Did the SEA meet all	ADE does not specify if the participation rate applies to statewide mathematics and reading/language arts assessments.
requirements?	✓ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The ADE must clarify that the participation rate applies to statewide mathematics and reading/language arts assessments.

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

$\underline{A.4.viii.a:} \ Exit\ Criteria\ for\ Comprehensive\ Support\ and\ Improvement\ Schools\ (ESEA\ section\ 1111(d)(3)(A)(i)(I))$

- 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)?

	Peer Response
D 4 1 1	
Peer Analysis	The State's exit criteria, evaluated every three years, scaffold schools which
	continue to fall within the bottom 5% and exit schools which exceed the
	bottom 5% in the state through an upward annual trend. The exit criteria take
	into account "Progressing Toward Sustainability," where schools demonstrate
	a continuous improvement trend. (p.50-51)
Strengths	Schools must demonstrate an upward trend in addition to exceeding the
	bottom 5% of school index scores. Also, the scaffolding provided to continued
	comprehensive support schools addresses many of the common frustrations of
	cyclical school improvement efforts.
Weaknesses	The exit criteria do not ensure improved student achievement. While an
	emphasis on continued progress is important, it needs to be set at a
	consistently high level to motivate LEAs, schools, teachers, students, and
	parents to work together to improve the lowest performing schools.
	It is not clear if the exit criteria and improvement trends are based on the
	school index score. The exit criteria are not aligned with the state's long-term
	goals for 80% proficiency. Due to non-achievement related factors included
	in the school index score, schools which exit based on improved scores may
	not inherently be improving student achievement toward the goal of 80%
	proficiency in 12 years.
Did the SEA meet	
Dia ine SEA meet	⊠Yes (4 peer reviewers)

all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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)?

	Peer Response
Peer Analysis	The State applies similar methodology in the "Progressing Toward Sustainability" and requirement for an upward annual trend; however, neither of these criteria take into account the improvement necessary to close statewide proficiency and graduation rate gaps. Schools are expected to meet criteria within three years and continue progress to improve student progress/success of those subgroups. (p.50-51)
Strengths	Exit criteria are practical and consistently applied.
Weaknesses	If the low performing subgroup meets exit criteria with an index score that exceeds the 5% threshold and the group improves its index score annually, it is possible for achievement gaps within the school to widen if all students improvement also trends upward at a greater pace. While the plan indicates schools will be reevaluated every three years, it does not seem to specify the number of years within which schools should meet the exit criteria. In addition, how the exit criteria will ensure continued progress is not addressed.
Did the SEA meet	⊠Yes (1 peer reviewer)
all requirements?	⊠ No (3 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The information provided by the State was insufficient, for some reviewers, in order to determine whether the criteria were met. Therefore, the State's description must clarify the number of years within which schools are expected to meet such criteria. Additionally, the State must clarify whether 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

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?

	nn
	Peer Response
Peer Analysis	The ADE describes an array of actions it may pursue to aid the improvement of comprehensive support schools failing to meet exit criteria within three years. The most significant of these changes seem to involve reconstitution of personnel/enrollment and reducing budget flexibility of federal and state allowances. Analysis by the state and the school will examine challenges and barriers to improvement and why previous plans for support were not effective. A set of pre-determined more rigorous interventions will not be set
	but individualized support will be designed. (pp.52-53)
Strengths	The ADE identifies numerous levers and contextual considerations to support turnaround as well as a process for the SEA and LEA to work together to provide additional supports.
Weaknesses	LEAs in need of more rigorous state-determined action may be negatively impacted if "evidence-based practices" are reduced in favor of non evidence-based practices and/or no practice at all. While an all-size-fits-all approach might not be effective, it seems like the state would need to be careful to ensure equitable treatment of all schools in this category.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The State will implement a "Plan, Do and Check" to meet this criterion. LEAs will submit applications to the AR Department of Education for review, and if
	approved, resource allocations. The proposed system is tailored to meet the
	specific needs of each school. The State provides an extensive checklist for
	LEA applications for the allocation of funds to support school improvement.

1	1
	The ADE will use its formula funding application process to track and monitor LEA spending amongst its targeted and comprehensive support schools. This process encourages closer monitoring within each school year and onschedule, within budget spending. ADE's process and relationships with title I schools seems intensive and robust.
Strengths	The LEA application includes a Plan/Do/Check matrix across a broad
	spectrum of recognized activities to support school improvement.
	If available, supplemental grants will be awarded on an as-needed basis. Monitoring process is based on the application to fund activities aligned to the school's needs assessment.
Weaknesses	It is not clear why the LEA will allocate resources on a formula basis to support the unique school improvement needs. While the State does plan to award some funds on a competitive basis (p.54), it is not clear why this is not part of the plan rather than "if funds are available?"
	By prescribing action to LEAs with a large number of comprehensive support schools, ADE takes on a large set of responsibilities typically entrusted to administrators, parents, community members, governing boards, etc. ADE would bear some responsibility for schools' improvement – and/or any lack thereof – by diminishing local control in favor of increased oversight.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The State will provide differentiated technical support based on local capacity and outlines a comprehensive array of technical assistance and potential progressive levels of supports for schools identified for comprehensive and targeted support and improvement. The scope of technical assistance is progressive and broad.
	The State will establish an LEA designee to broker the needed support. (p.54). The SEA is developing rules to implement a state statute to define "five levels of support to be provided to LEAs."

Strengths	The ADE provides an extensive Table to illustrate the progressive level of support to LEAs. Table 20 pp. 56-58)
Weaknesses	It is not clear if the state statute referenced on p. 55 will enhance or limit SEA involvement with LEAs.
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that	INO (0 peer reviewers)
an SEA must provide to fully meet	
this requirement	

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?

	Daan Dagnonga
	Peer Response
Peer Analysis	AR will rely on extended analysis of LEA systems to determine if additional
	actions are necessary. Beyond the more rigorous interventions that could be
	used to turnaround a persistently lowest performing school, ADE identifies
	state sanctions in place to classify and respond to district need. The plan
	describes further actions that may take place such as reallocation or
	reassignment of personnel. (p.59)
Strengths	The State does include reallocation of resources, reassignment of personnel, or
	"other interventions" as possible actions the State may take. The State may
	also designate the district in need of intensive support.
	ADE plans to explore additional options such as collaborative learning
	opportunities for LEAs which would benefit from a mentor/peer in its
	turnaround efforts.
Weaknesses	The SEA does not articulate an escalating set of actions for LEA
	improvement.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
-	□ No (o peci reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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?⁴

	Peer Response
Peer Analysis	AR intends to complete a Workforce Stability Index which may provide this information. (p.59) However, the required data is not available yet.
	ADE does not describe any information that would suggest students from low-income households or minority students are served by equally qualified or less qualified educators at proportionate rates. ADE provides no data other than a LEA tool under development and the effort to create support plans for directed and intensive support schools only.
Strengths	Arkansas is working on a Workforce Stability Index to provide information at the local level and is planning public reporting of ineffective, out-of-field, non-licensed, and inexperienced teachers.
Weaknesses	There is no timeline for developing and reporting this information.
	The state plan does not describe the extent to which there are disproportionate rates of access to educators.
Did the SEA meet	☐ Yes (0 peer reviewers)
all requirements?	⊠ No (4 peer reviewers)
If no, describe the specific information or clarification that an SEA must	The ADE must describe the extent to which students from low-income households or minority students are served by equally qualified or less qualified educators at proportionate rates. ADE must describe operational definitions used to calculate disproportionality.
provide to fully meet this requirement	

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?

⁴ 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.

- > 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?

	Peer Response
Peer Analysis	The State describes the support it provides to all LEAs and schools to improve school conditions for student learning including bullying, health and wellness, RTI/PBIS, and school choice. (pp. 59-62) Specific activities for Title I are focused on schools in need of Comprehensive Support where discipline data are collected and used as part of the leading indicators. Most of the activities appear to be opportunities LEAs may avail themselves of rather than a planned support system. However, the support options are plentiful and useful.
Strengths	The State provides many opportunities for LEAs to receive support to improve school conditions. Many tools, resources, technical assistance made readily available to schools to support any one of these efforts.
Weaknesses	
Did the SEA meet all requirements?	 ⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The State has "empowered and encouraged" LEAs to take responsibility for assessing the LEA factors that are contributing to school risk factors. (p.62) Included in this Plan are descriptions of many statewide activities and collaborations to demonstrate Arkansas' commitment to meet the needs of students at all levels of schooling.
Strengths	The availability of academic content to help promote middle school students' academic readiness seemed to be the most relevant to successful middle to high school transition. ADE describes many evidence-based initiatives for successful transition in
Weaknesses	earlier grades as well as initiatives to gain additional evidence from feeder pattern schools. ADE provides no evidence to suggest its efforts to develop new academic

	courses yields better results or decreases the risk of students dropping out.
Did the SEA meet	⊠Yes (4 peer reviewers)
all requirements?	□ No (0 peer reviewers)
If no, describe the	
specific information	
or clarification that	
an SEA must	
provide to fully meet	
this requirement	

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?

	Peer Response
Peer Analysis	The State fully describes the process it has undertaken to standardize statewide entrance and exit exams implemented for the 2017-2018 school year. The procedures include meeting the 30 day status assessment as well as consultation with building administrators, English for Speakers of other languages teachers, classroom teachers, and parents. The state indicates that the parental notification will be done in other languages so it is unclear how the English only statute impacts classroom activities and parental interactions. The Plan provided an extensive description of English for Speakers of Other Languages Coordinators, service providers at Education Service Cooperatives, and Title III Advocacy Groups across the State. (p.89)
Strengths	The State's plan is complete and includes all the required elements (pp. 89-91). Of particular note are the common home language surveys to improve identification processes/practices for schools and families to the benefit of their EL students.
Weaknesses	
Did the SEA meet all requirements?	 ⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	The state is transitioning to a new English proficiency screener to be operational in 2018-2019 with adequate plans to train LEAs and use standard proficiency scores (p.89) Beyond the initial assessment, the State continues to develop a long-term plan to fully support these students. The plan includes the usual gap analysis and identifying best practices and supports for educators but it does not have a completion date indicated herein. The Table 17 on p.45 indicates that almost 75% of Arkansas schools have English Language Learners thus requiring this plan to be robust and carefully monitored during implementation.
Strengths	The State plans to meet this requirement.
Weaknesses	Additional details, including implementation timelines, need to be established.
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers)
	□ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?

	Peer Response
Peer Analysis	ADE will implement a series of monitoring activities based on an annual, biannual, and triannual review. The results of these reviews will be used to inform the need for an on-site monitoring visit. Support offered to the Title III LEA in need of improving EL student outcomes will be based on matching LEA needs with evidence-based solutions.
Strengths	Arkansas presents a monitoring plan that could result in a compliance review after three years. It also provides for a system of support at the LEA level based on the accountability system. (p.94)

	Indicators used to identify districts for technical assistance and progressive interventions are comprehensive and outcome based.
Weaknesses	Specific data trends beyond the accountability system will not be reviewed until years two and three of implementation which may be too late for appropriate corrections and/or checking the progress of the new screening instruments.
Did the SEA meet all requirements?	⊠Yes (4 peer reviewers) □ No (0 peer reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Z no (o pect remens)