

REQUEST FOR WAIVERS FROM CALIFORNIA LEAS (CORE)*

Request Review Form

Date:

*This form is being used by peer reviewers to review a request from a consortium of nine local educational agencies (LEAs) in California for waivers under section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). This form has previously been used by peers to review requests from State educational agencies (SEAs) for ESEA flexibility. The peers reviewing the LEAs' waiver request are using this form for their review for the sake of ease and convenience, given the significant similarity between the waivers requested and plans submitted by the LEAs to the waivers requested and plans typically submitted by SEAs requesting ESEA flexibility. For purposes of reviewing the LEAs' request, this form has been changed only in three respects: (1) this cover page; (2) the header on each subsequent page; and (3) section 2.B., which the U.S. Department of Education (ED) modified because the LEAs are not requesting waivers to replace the State's annual measurable objectives (AMOs) with new AMOs, which is a State-level waiver, but instead are proposing additional AMOs for use in their new system of differentiated recognition, accountability, and support. As a result, that section of the LEAs' request differed significantly from 2.B. in an SEA's request for ESEA flexibility.

Because this form was previously used to review requests for ESEA flexibility, many prompt questions or other sections of the template created by ED refer to an "SEA's request" or particular action by an SEA. The peers reviewing the LEAs' request for waivers have used their discretion to determine

when those questions actually pertain to the consortium's request or action by an LEA for purposes of the present review. Accordingly, in the final version, the subject in their notes may not match the subject in the question posed. Please contact ED with any questions regarding this review form.

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REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

Consultation Question 1 Peer Response*Response: (0 Yes; 6 No)*

Consultation Question 1	<p>Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?</p> <ul style="list-style-type: none"> ➤ <i>Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?</i> ➤ <i>Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?</i>
Response Component	Panel Response

Consultation Question 1	<p>Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?</p> <ul style="list-style-type: none"> ➤ <i>Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?</i> ➤ <i>Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?</i>
<i>Rationale</i>	<p>The California Office to Reform Education (CORE) was established to create a locally driven system of peer accountability and support for participating districts. However, the request submitted by CORE does not provide sufficient information to determine how teachers and their representatives from each of the participating districts were meaningfully engaged in development or feedback, making it difficult to determine if the request will be successfully implemented, given the level of involvement at the district and school level proposed.</p> <p>CORE states that a tremendous amount of input from superintendents and teachers was used to develop the CORE request. However, there was no documentation about how the input was gathered or the topics on which input was provided (P. 14). CORE states that it received input from teachers “on assignment” but there is no indication as to who those teachers are.</p>
<i>Strengths</i>	<p>The CORE districts used several education organizations to provide expertise and support in the consultation phase (P. 14).</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>CORE indicates that districts have and will continue to “engage their own local communities in the development and implementation of the principles included in this waiver”; however, there was no evidence submitted to indicate how educators and their representatives were involved in providing feedback on CORE’s request. Although there numerous citations of actions districts have taken toward this end, the feedback and subsequent changes were not included in the documentation.</p> <p>Page 15 of the request indicates that LEAs will be responsible for engaging stakeholders, but the Memorandum of Understanding (MOU) that must be signed by any district that wishes to join CORE does not appear to include language that would require the district to consult with teachers or their</p>

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	<p>representatives prior to entering the partnership with CORE (Appendix A).</p> <p>The request states that districts can join the consortium at any time (P. 18). The CORE request did not address how these districts will engage and solicit feedback from teachers and their representatives prior to entering into the MOU to participate in the consortium and implement the waivers.</p> <p>Evidence, other than a statement, was not provided that demonstrated the level or content of the input provided by teachers.</p> <p>A decentralized approach to gather input will be used by CORE districts to further the advancement of each component of the request. This could result in very different perspectives on how to implement the CORE waivers (P. 14).</p> <p>CORE did not provide information about how teachers or principals were included in planning for the interventions in priority schools, which require teachers and principals to facilitate various projects (<i>e.g.</i>, page 61 indicates that “teachers will drive a community engagement campaign that leverages parent and student voice and input and builds a sense of community around problems solving”). There is no discussion of what would happen to the resources of the home school when teachers or principals are utilized to provide technical assistance to priority schools. CORE does not discuss if there is teacher or principal buy-in for this strategy.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should consider creating a plan with materials for districts to disseminate information and to document feedback from teachers and their representatives. CORE should provide documentation of the number and diversity of teachers involved in the development of all three principles of the request, as well as the overall request, and the structures and strategies of their involvement. The documentation should</p>

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	<p>also include a listing of the feedback received and how that feedback was addressed, including how CORE specifically addressed feedback related to the waiver request components. CORE should consider analyzing cross-district input from teachers to inform and make changes to its request.</p> <p>CORE might consider revising the MOU to include language that requires districts to meaningfully engage teachers and their representatives prior to entering into the MOU.</p> <p>CORE should provide descriptions, invitations, agendas, attendee lists (consistent with any applicable privacy requirements), and/or meeting notes of the consultation opportunities for educators in the development of the overall request.</p> <p>CORE should provide detail on how the decentralized approach to consultation in districts will lead to consistent and rigorous implementation of the waivers.</p>

Consultation Question 2 Peer Response*Response: (0 Yes; 6 No)*

Consultation Question 2	<p>Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?</p> <ul style="list-style-type: none"> ➤ <i>Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?</i> ➤ <i>Did the SEA indicate that it modified any aspect of its request based on stakeholder input?</i> ➤ <i>Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?</i>
Response Component	Panel Response

Consultation Question 2	<p>Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?</p> <ul style="list-style-type: none"> ➤ <i>Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?</i> ➤ <i>Did the SEA indicate that it modified any aspect of its request based on stakeholder input?</i> ➤ <i>Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?</i>
<i>Rationale</i>	<p>Because CORE's request did not provide information about how it meaningfully engaged and solicited input on its request from other diverse communities and across all districts involved, it is not possible to determine if the request will result in successful implementation across all districts.</p> <p>CORE notes that its partner districts intend to engage their local communities in the development and implementation of the waivers (P. 14). It is unclear how, or if, input gathered after the fact will be incorporated into the development and implementation of the waiver components.</p>
<i>Strengths</i>	<p>Representatives from Education Trust West, Association of School Administrators Superintendents' Council, County Office of Education Superintendents, West Ed, and the Parthenon Group provided CORE with guidance in the development of the request (P. 15).</p> <p>CORE recognizes the need for districts to engage stakeholders at the local level.</p> <p>CORE sought input from the SEA on its request.</p> <p>CORE states that it intends to consult with the other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes (P. 14).</p>
<i>Weaknesses, issues, lack of</i>	<p>The March 22, 2013 letter to the U.S. Department of Education from the State Superintendent of Public Instruction for the California Department of Education (CDE) and the President of the California State</p>

Consultation Question 2	<p>Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?</p> <ul style="list-style-type: none"> ➤ <i>Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?</i> ➤ <i>Did the SEA indicate that it modified any aspect of its request based on stakeholder input?</i> ➤ <i>Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?</i>
<i>clarity</i>	<p>Board of Education on behalf of the California State Board of Education demonstrates that there is confusion on behalf of the SEA with regard to expectations for the implementation and monitoring of the waivers, if granted. Because the request does not clarify the relationship or provide evidence of agreements between the CDE and CORE districts, it is not possible to determine how these two entities will interface in the implementation of the waivers (<i>e.g.</i>, disbursement of funds, continued access to CDE resources for Common Core State Standards (CCSS) curriculum development, Smarter Balanced Assessment Consortium (SBAC) materials, identification of districts and schools, etc.). Further, this request creates a dual system of accountability for the CORE districts that CORE did not sufficiently address with regard to the feasibility. Without this level of coordination between the SEA, CORE, and CORE districts, there is potential for much confusion among parents, teachers, and administrators, making it unlikely that the desired changes will be successful.</p> <p>It is not clear what will happen with CORE's waivers if the SEA applies for state-level waivers.</p> <p>Because districts can opt in and out of CORE, this may create confusion and inconsistencies in the application of accountability and improvement. The process by which districts can opt in, opt out, and then opt back in with the consortium is unclear.</p> <p>No evidence was submitted to indicate that diverse stakeholders representing students with disabilities, English Learners, or Indian tribes were involved in providing feedback on CORE's request.</p>

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	<p>Although page 15 of the request indicates that districts will be responsible for engaging stakeholders, the MOU does not appear to include language that would require districts to consult with diverse stakeholders prior to entering the partnership with CORE (Appendix A).</p> <p>The request states that districts can join the consortium at any time (P. 18). The CORE request did not address how these districts will engage and solicit feedback from diverse stakeholders prior to entering into the MOU to participate in the consortium and implement the waivers.</p> <p>None of the consultation has occurred at the time of submission of this waiver request.</p> <p>CORE expects (but does not require) that the consultation process be sustained across all districts, but does not set forth how this will be checked and what will happen if a district does not meet the minimum guidelines.</p> <p>It is not specifically stated whether the input provided by CDE or State Board resulted in any changes to the request.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE leadership should consider meeting with State Board and CDE representatives to craft an acceptable waiver request that is agreed upon by all parties. This may help to reduce the unintentional burden on districts that will implement multiple, complex systems, <i>e.g.</i>, clarifying what the requirements are for a non-priority, non-focus school designated as a State turnaround school.</p>

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	<p>Because CORE is proposing a very different system than is currently being implemented throughout the State under the authority of the SEA, it is essential that there is buy-in from all representatives from each district prior to a district's opting into the consortium. In addition to teachers, principals, and their representatives, CORE should identify how students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities, English Learners, and Indian tribes will be engaged in feedback about the waiver request and its components, including how the districts will be accountable for both the CORE and SEA systems. CORE districts should gather feedback and address concerns in their next revision of the waiver request. CORE should maintain lists or counts of participants with identifying information that allows the public to know who provided feedback, consistent with all applicable privacy laws.</p> <p>CORE should document consultation feedback and be clear about how it was used in the revision to the request. CORE should consider analyzing cross-district input from teachers to inform and make changes to its request.</p> <p>CORE might consider revising the MOU to include language that requires districts to meaningfully engage diverse stakeholders prior to entering into the MOU.</p>

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

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

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

1.B Peer Response, Part A Peer Response

Response: (6 Yes; 0 No)

1.B Peer Response, Part A	<p>Part A: Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?</p> <p><i>Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.</i></p>
Response Component	Panel Response
<i>Rationale</i>	<p>CORE districts plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year; however, the plan is incomplete and does not provide the specific components within a high quality plan.</p> <p>CORE will implement the CCSS and since the CA 2010 adoption of CCSS, CORE has been planning and developing implementation plans for CCSS (P. 27). There is a well described plan to phase in CCSS and provide guidance and professional development to teachers (P. 30).</p>

1.B Peer Response, Part A	<p>Part A: Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?</p> <p><i>Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.</i></p>
<p><i>Strengths</i></p>	<p>CORE districts are working in a collaborative environment to implement the CCSS in English-language arts and mathematics, including developing new performance tasks, formative assessments, instructional materials, and professional development linked to the CCSS (P. 27). Other CA districts will also be transitioning to the CCSS since CA adopted these standards in 2010.</p> <p>CORE Districts intend on using the resources developed by the CDE and the SBAC (P. 27).</p> <p>CORE facilitated a Summer Assessment Design Institute that resulted in the development of performance tasks aligned to the CCSS. Teachers from CORE districts piloted the assessment in fall, 2012 and provided feedback (P. 28).</p> <p>The teacher and principal evaluation system and metrics are being analyzed across participating districts by Regional Education Lab (REL) and CORE district talent management leaders. CORE intends to define the pedagogy inherent in the more rigorous standards so that the evaluation system will drive changes in practice (P. 29).</p> <p>During phase three of the plan, CORE intends to partner with institutes of higher education (IHEs) to align teacher preparation program with the CCSS, as is currently occurring with California State Universities at Long Beach and Fresno (P. 33).</p> <p>Connect Ed and Linked Learning Alliances will partner with CORE to create secondary instructional modules from a grant funded literacy and math collaborative.</p> <p>CORE is working with West Ed to document its implementation plan in a research study (P. 27).</p> <p>CORE has a phase in model for the CCSS, building shared knowledge and understanding in 2011-2012 and 2012-2013, transitioning to CCSS in 2012-2013 and 2013-2014, and application in 2013-2014 and 2014-2015 (P. 28).</p> <p>CORE is piloting performance task modules in over 600 classrooms to conduct research and evaluation in partnership with REL West and the CA Center for Teaching and Learning to inform implementation and professional development planning in CORE districts and elsewhere (P. 29)</p> <p>Professional development will be provided to all teachers (PP. 29 and 30)</p>

1.B Peer Response, Part A	<p>Part A: Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?</p> <p><i>Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.</i></p>
<i>Weaknesses</i>	Evidence does not support whether CORE has the capacity and resources to ensure that individual district transition activities occur.
<i>Technical Assistance Suggestions</i>	<p>CORE should build on its existing plan by providing the following components of a high-quality plan: clear goals, objectives, action steps, timeline specific to responsible parties, and resources.</p> <p>CORE should specify roles for CORE staff, district, and school staff in the transition to the standards, including who and how monitoring that aligned instruction is being provided to all students to prepare them to be college- and career-ready.</p> <p>Please provide a clear definition of college- and career-ready for CORE district students.</p>

1.B Peer Response, Part B Peer Response*Response: (1 Yes; 5 No)*

1.B Peer Response, Part B	<p>Part B: Is the SEA's plan likely to lead to all students, including English Learners, students with disabilities, and low achieving students, gaining access to and learning content aligned with the college- and career-ready standards?</p>
Response Component	Panel Response
<i>Rationale</i>	<p>Specific details about English Learners, students with disabilities, and generally low achieving students is lacking in CORE's plan. The plan describes some of the actions that will be undertaken to support the needs of English Learners and students with disabilities but it is unlikely this work will lead to all students gaining access to and learning content aligned with the college- and career-ready standards.</p> <p>CORE is planning a phase in application of the CCSS allowing for ample time for all teachers to be prepared to teach all students to ensure depth of understanding. CORE is also using outside experts to develop more specific guidance for providing CCSS-aligned instruction for English Learners and students with disabilities.</p>

1.B Peer Response, Part B	Part B: Is the SEA's plan likely to lead to all students, including English Learners, students with disabilities, and low achieving students, gaining access to and learning content aligned with the college- and career-ready standards?
<i>Strengths</i>	CORE will engage outside partners and experts to develop pedagogically appropriate instruction for all students to ensure deep learning, with a special focus on English Learners and students with disabilities (P. 29).
<i>Weaknesses, issues, lack of clarity</i>	<p>Although the request states that CORE will facilitate collaborative prototyping of district instructional plans and that attention will be paid to English Learners and students with disabilities (P. 29), a specific plan for what and how training and resources will be provided to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards was not provided.</p> <p>CORE states that the consortium will identify English Language Development (ELD) standards-aligned learning targets (P. 29) and that ELD benchmarks and achievement indicators will be established but does not address how or when this process will take place or who will be involved.</p> <p>CORE's plan did not address how its plan will meet the needs of low achieving students.</p> <p>CORE's plan did not indicate if and how students with disabilities and English Learners and their teachers were included in the performance assessment pilots.</p> <p>The request did not indicate training or resources teachers of students taking the alternate assessment based on alternate achievement standards would be provided to prepare students for college and career readiness.</p>

1.B Peer Response, Part B	Part B: Is the SEA's plan likely to lead to all students, including English Learners, students with disabilities, and low achieving students, gaining access to and learning content aligned with the college- and career-ready standards?
<i>Technical Assistance Suggestions</i>	<p>CORE should provide more details about the type and regularity of professional development, monitoring, and support that will be available to teachers of English Learners, students with disabilities, and low achieving students, specifically the degree to which individualized support will be made available given the higher needs of those students. CORE should provide a more detailed plan for professional development delivery and supportive resources in a variety of formats. CORE should address plans for students with the most significant cognitive disabilities with regard to the alternate assessment system and standards implementation.</p> <p>More examples of outside partners and experts could be provided as well as what they will be specifically tasked with doing.</p> <p>Be more specific about the activities that have already occurred, when they occurred and the outcomes.</p>

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

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

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

1.C, Option B Peer Response

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

Response: (Yes or No)

1.C, Option B	<u>If the SEA selected Option B:</u> If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic and high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

Principle 1 Overall Review**Principle 1 Overall Review Peer Response***Response: (6 Yes; 0 No)*

Principle 1 Overall Review	Is the SEA's plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response

Principle 1 Overall Review	Is the SEA's plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
<i>Rationale</i>	<p>Since the 2010 adoption of CCSS, CORE has been supporting the partner districts in transitioning to the CCSS above and beyond what the State has done (P. 27). CORE describes a process to phase in the CCSS and provide guidance and professional development to teachers (P. 30). However, there is no evidence of the content developed to deliver this information to teachers. CORE is planning a phased-in application and guidance to allow educators to begin providing instruction of the CCSS prior to 2013-2014. CORE intends to use outside experts to develop more specific guidance for providing CCSS-aligned instruction for English Learners and students with disabilities.</p> <p>While CORE has an implementation plan, peers would like CORE to ensure that it will adequately address, equitably across all districts, the resources and supports that are necessary for all teachers, including teachers of English Learners and students with disabilities.</p>
<i>Strengths</i>	<p>CORE has facilitated cross-district collaborative planning sessions designed to plan for systemic transition within the district, across districts, and across the CORE system (P. 27).</p> <p>CORE is engaging outside experts to support CCSS' transition and implementation. For example, CORE is piloting performance task modules in over 600 classrooms to conduct research and evaluation in partnership with the Regional Educational Laboratory (REL) West and the California Center for Teaching and Learning to inform implementation and professional development planning in CORE districts and elsewhere (P. 29).</p> <p>CORE intends to define the pedagogy inherent in the more rigorous standards so that the evaluation system will drive changes in practice (P. 29).</p> <p>During phase three of the plan, CORE intends to partner with institutions of higher education (IHEs) to align teacher preparation programs with the CCSS, building on the model currently occurring with California State Universities at Long Beach and Fresno (P. 33).</p>
<i>Weaknesses, issues, lack of clarity</i>	CORE indicates that districts are collaborating to create shared plans for implementation for the CCSS (P. 27). However, CORE did not submit evidence of a process to monitor that districts are implementing CCSS

Principle 1 Overall Review	Is the SEA's plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
	<p>appropriately and will be prepared to fully implement in 2013-2014. For example, CORE districts will be creating their own professional development plans. The request did not specify how these plans will be vetted or monitored for completeness and implementation.</p> <p>The application of the standards for students with disabilities, including students taking the alternate assessment based on alternate academic achievement standards, English Learners, and low achieving students does not include specific details about what and how training and resources will be provided to ensure that all students will have the opportunity to achieve to CCSS.</p>
<i>Technical Assistance Suggestions</i>	Specific technical assistance is located in each principle's section.

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

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

2.A.i Peer Response

Response: (0 Yes; 6 No)

2.A.i	Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2013–2014 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? <i>(note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b)</i>
Response Component	Panel Response
<i>Rationale</i>	<p>CORE proposes a transition accountability system. Many of the specific details of the final accountability system and identification of reward, priority, and focus schools will not be determined until spring/summer 2013.</p> <p>The transitional differentiated recognition, accountability, and support system is planned for implementation no later than 2013-2014. While plans are in place, there are components that are not fully developed.</p>
<i>Strengths</i>	<p>Participating districts will send data to an agreed-upon third-party aggregator that would produce both accountability metrics and learning dashboards (P. 20).</p> <p>CORE's proposed system is grounded in the concept of moral imperative described in the work of Michael Fullan and stands on the belief that college- and career-readiness for all students is achieved only if disparity and disproportionality are eliminated (P. 37).</p> <p>The accountability system recognizes local contexts and values (P. 38).</p> <p>A shared dual K-12 data collection and information system will collect and report summative data for accountability and formative data for continuous improvement (P. 40).</p>
<i>Weaknesses, issues, lack of clarity</i>	CORE proposes using only test scores from the highest grade level of each individual school for accountability (P. 37). This may not give an accurate picture of the whole school, and may leave out the

2.A.i	Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2013–2014 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? <i>(note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b)</i>
Response Component	Panel Response
	<p>academic performance of significant subgroups.</p> <p>CORE has not identified what “n-size” it will use in its accountability system, and whether it will use the 95% participation rate in calculating school performance.</p> <p>CORE proposes using multi-grade assessments, which may result in some students not being tested on the standards on which they were taught (P. 38).</p> <p>Although the accountability system will include a growth measure, the measure will not be developed until 2013-2014 (P. 43).</p> <p>There is little information about the measures for chronic absenteeism, non-cognitive skills, and persistence rates, although they will be included in the final accountability system.</p> <p>CORE proposes to include reductions of suspension and expulsion in the system. While suspensions and expulsions are not positive events, including such measures in an accountability system provides a perverse incentive to the school to keep kids in the building that present a potential danger to other students in order to maintain a stronger accountability rating.</p> <p>CORE will engage in a request for proposals (RFP) for an external provider to develop a dual dashboard reporting system during spring/summer 2013 (P. 42). The timelines for completion of the system do not appear to be adequate for school identification for the 2013-2014 school year. CORE does not provide information regarding data ownership and security.</p>
<i>Technical Assistance Suggestions</i>	CORE should consider using test scores for all grades 3-8, and at least one grade in high school, in the accountability system, not just test scores from the highest grade in a school.

2.A.i	Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2013–2014 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? <i>(note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b)</i>
Response Component	Panel Response
	<p>CORE should provide in its request information about “n-size” and participation rate.</p> <p>CORE should consider using grade level assessments rather than multi-grade assessments.</p> <p>CORE should describe chronic absenteeism, non-cognitive skills, and persistence rates as used in the system.</p> <p>CORE should reconsider using reduction of suspension and expulsion in the system.</p>

2.A.i.a Peer Response*Response: (0 Yes; 6 No)*

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
<i>Rationale</i>	<p>Using the highest grade level only for accountability does not meet the requirements to provide differentiated recognition, accountability, and support for all LEAs in the consortium and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups.</p> <p>It is unclear whether CORE's transition system provides differentiated recognition, accountability, and support for all of its participating districts and for all Title I schools in those districts. CORE proposes to use assessment data for only the highest grade in a school for accountability purposes, and will not include graduation rate for all students and subgroups in its transition system. CORE will not develop the details of its final system until spring/summer 2013.</p>
<i>Strengths</i>	<p>All CORE participating districts have developed and employed internal accountability systems or district data dashboards (P. 38).</p> <p>A shared dual k-12 data collection and information system (district-level and CORE-level) will collect and analyze student, school, and district performance (P. 39).</p> <p>CORE plans to develop its growth model in spring/summer 2013 with 2014-2015 SBAC data to serve as the baseline (P. 43).</p> <p>CORE has a desire to align its accountability system with its belief that addressing disparity and disproportionality will increase student achievement.</p>
<i>Weaknesses, issues, lack of clarity</i>	Only the state assessment results of the highest grade level of students in a school will be included for accountability purposes (P. 38). This could result in: unintended focus on only the grades included for

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
	<p>accountability; the inability to identify where there is truly a strength or lack of educational effectiveness; grade level placement because of reasons other than academic performance; placing all of the best teachers in a single grade; minimalizing the resources spent in lower grade levels; an incomplete reflection of the needs, proficiency and growth of English Learners and students with disabilities (or all subgroups) in a school; delays in the identification of issues or concerns until the final grade level; and districts setting lower proficiency standards at the ultimate grade level so that it is easier for these grades to achieve the targets and is easier to show growth. Achievement in the highest grade level only does not account for student achievement for all students and all subgroups, or school performance and progress over time for all students and subgroups.</p> <p>CORE proposes the use of multi-grade assessments (P. 38). Using multi-grade assessments means that students are not necessarily being tested on the curriculum standards for which they are taught.</p> <p>Data collection, reporting, and sharing are described for formative and summative data, but it appears this may be non-public data (P. 39). It is unclear how data is used for school improvement and what is publicly reported.</p> <p>The accountability system will include a growth measure; however, the growth measure will not be developed until 2013-2014, with 2014-2015 being the baseline. In addition, there are no details about the ideology, procedures, or metrics that will be used in the development of the model (P. 43).</p> <p>CORE is establishing proficiency cut points on the common assessments for the CORE districts (P. 43). Based on the statement in the waiver, it is not clear why CORE is setting its own standards for proficiency on a common assessment.</p> <p>Persistence rates (and calculation) used for accountability are not well described (P. 44).</p>

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
	<p>Non-cognitive skills will be included in the accountability system but are not defined (P. 45).</p> <p>Reductions in suspension and expulsion rates are included in the accountability system (PP. 45 and 56). While suspensions and expulsions are not positive events, including such measures in an accountability system provides a perverse incentive to the school to keep kids in the building that present a potential danger to other students in order to maintain a stronger accountability rating.</p> <p>Chronic absenteeism (and rates or calculation) is used for accountability but is not well described (P. 45).</p> <p>It appears as if the accountability measures were selected because they were already being collected by the districts rather than because they were educationally sound measures to include in an overall accountability system.</p> <p>Each district in CORE will develop its own accountability system (P. 46). It is not clear to peers how CORE will ensure comparability and consistency of accountability systems to make school performance determinations, <i>e.g.</i>, consistency in reward school identification across districts. If districts have their own accountability system measures, it is unclear how reward, priority and focus schools can be identified with consistency.</p> <p>Special education identification rates and re-designation rates of English Learners will be included in the accountability system. Limiting or reducing the number or percent of students designated as students with disabilities or English Learners is a positive action; however, this could create a perverse incentive for districts to not classify a student who is truly in need of these additional services in order to improve the accountability designation.</p> <p>No data is provided on the current academic progress or success for any of the CORE districts.</p>

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
	<p>Graduation rates will not be included in the accountability system as a distinct measure until the 2014-2015 school year, nor does CORE specify which graduation rate it will include (<i>e.g.</i>, the adjusted cohort graduation rate, leaver rate) or the weighting of the graduation rate in the overall rating.</p> <p>There is nothing described about the growth measure, including whether it will be used system-wide or locally for each district, which data it will include (given only the highest grade will be used), and whether the growth model is a criterion-based, normative, simple model or more complex. More details are needed on the growth model in order to determine if it is educationally sound.</p> <p>CORE did not describe the process for establishing proficiency cut points on the Statewide assessments, and whether the CDE or the SBAC will conduct this activity.</p> <p>Students with disabilities assessed on alternate assessments based on modified and alternate achievement standards will not be included in the accountability system until 2014-2015.</p> <p>While CORE commits to reporting all student subgroup performance, it is not clear which indicators and how the indicators will be publicly reported, or when.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should specifically indicate how each of the indicators in its accountability system relate to improving student achievement.</p> <p>CORE should ensure that indicators in the accountability system are not perversely reducing identification of English Learners and students with disabilities and do not provide perverse incentives to not adequately serve students in lower grade levels.</p> <p>CORE should provide a research base to show that these indicators and that accountability for the highest grade level will lead to improved student achievement for all students and all subgroups otherwise consider</p>

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
	<p>including all grade levels.</p> <p>CORE should also provide a research base for the use of parent surveys in school accountability determinations. CORE should consider that highest grade level accountability may not be best for meeting the needs of English Learners and students with disabilities.</p> <p>CORE should clarify what data is used for school identification and what is publicly reported and used for accountability purposes.</p> <p>CORE should provide a data table for CORE districts as a whole and by each district, for all students and disaggregated by subgroups, comparing cross-level growth data to highest grade level data to show how it will ensure lower grade levels are also making growth.</p> <p>CORE should provide data for each CORE district, and CORE as a consortium, on current student academic achievement and success on the current indicators as described in the waiver request. CORE should provide state comparisons where available.</p> <p>CORE should provide a graphic layout of the accountability report including the weighting of each indicator and the overall rating classifications/scores to be assigned to the schools and districts.</p> <p>CORE should provide an example of a public report and a description of how the public will access it and when it will be available for public review.</p> <p>CORE should consider using grade level assessments as has been required by ESEA for purposes of accurate student comparisons in grade, rather than multi-grade assessments.</p> <p>CORE should provide details about the principles that the growth measure development will follow. For</p>

2.A.i.a	Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?
Response Component	Panel Response
	<p>example, will the measure capture individual student growth, will it be a simple measure of growth or a more complex statistical model, will it be a norm-based model or a criteria based model, how much weight will it carry in the overall accountability system, how will growth be measured if only the highest year grade level data is being considered, how will growth be measured on a multi grade assessments, etc.</p> <p>CORE should explain why it will be setting its own proficiency standards on common local assessments and why CORE will not be using the SBAC or California State standards.</p> <p>CORE should describe persistence rates that will be used in accountability stating in 2014-2015 (P. 44).</p> <p>CORE should define and provide examples of the non-cognitive skills that will be included in the accountability system as well as an explanation of how they will be included.</p> <p>CORE should reconsider the inclusion of reductions in suspension and expulsion rates in the accountability system.</p> <p>CORE should describe how chronic absenteeism will be determined and factored into the accountability system.</p> <p>CORE should consider developing a single accountability system for all CORE districts to allow for comparison across CORE districts.</p> <p>CORE should reconsider the use of special education identification rates and re-designation rates of English Learners in the accountability system.</p>

2.A.i.b Peer Response

Response: (0 Yes; 6 No)

2.A.i.b	Does the SEA's differentiated recognition, accountability, and support system create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students?
Response Component	Panel Response
<i>Rationale</i>	It is unclear whether CORE's differentiated recognition, accountability, and support system will create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students. The use of the assessment results only from the highest grade level in a school for accountability may not capture all the subgroups in a school, and may not provide a true picture of the subgroup achievement gaps.
<i>Strengths</i>	The basic philosophy acknowledges responsibility for preparing all students for college- and career-readiness, including English Learners and students with disabilities. The focus of eliminating disparity and disproportionality is appropriate and admirable; however, caution needs to be exercised so that standards are not lowered as a way to eliminate disparity and disproportionality.
<i>Weaknesses, issues, lack of clarity</i>	The state assessment results only of the highest grade level of students in a school will be included for accountability purposes (P. 38). This could result in: unintended focus only on the grades included for accountability; the inability to identify where there is truly a strength or lack of educational effectiveness; grade level placement because of reasons other than academic performance; placing all of the best teachers in a single grade; minimalizing the resources spent in lower grade levels; an incomplete reflection of the needs, proficiency and growth of English Learners and students with disabilities (or all subgroups) in a school; delays in the identification of issues or concerns until the final grade level; and districts setting lower proficiency standards at the ultimate grade level so that it is easier for these grades to achieve the targets and is easier to show growth. Achievement in the highest grade level only does not account for student achievement for all students and all subgroups, or school performance and progress over time for all students and subgroups.
<i>Technical Assistance Suggestions</i>	<p>CORE should reconsider using the assessment results only from the highest grade in a school for accountability purposes.</p> <p>CORE should provide a model of the data to demonstrate that the proposed accountability method is transparent in showing performance of all subgroups, including achievement gaps among all subgroups.</p>

2.A.i.c *Note to Peers: Staff will review 2.A.i.c*

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

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

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

2.A.ii., Option B Peer Response

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

Response: (0 Yes; 6 No)

2.A.ii., Option B	Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?
Response Component	Panel Response
<i>Rationale</i>	CORE did not provide enough detail to determine whether its weighting of the included assessments would result in holding schools accountable for ensuring all students achieve the CCSS. While CORE chose option B, there is no supporting narrative to describe specific assessments and weightings.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	CORE proposes inclusion of writing, science, and U.S. History in 2013-2014 but there is no description of how performance on these assessments will be included in the final accountability system (P. 44).
<i>Technical Assistance Suggestions</i>	

Note to Peers: Staff will review 2.A.ii.a and 2.A.ii.c (Option B)

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2.B Annual Measurable Objectives

- 2.B** Did the consortium propose an educationally sound method for setting annual measurable objectives (AMOs) that is likely to result in AMOs that properly identify schools and drive implementation of appropriate supports and interventions so as to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students?

Response: (0 Yes; 6 No)

2.B	<p>Did the consortium describe a method of establishing AMOs that is educationally sound?</p> <ul style="list-style-type: none"> i. Did the consortium provide an adequate description of the method it will use to set its AMOs? ii. Did the consortium provide an educationally sound rationale for the pattern of academic progress that will be reflected in the new AMOs? iii. Will the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
Response Component	Panel Response
<i>Rationale</i>	CORE's request listed the indicators that will be used as AMOs; however, no information was provided about how the AMOs would be set, how the targets would increase, etc. Consequently, it is unclear whether its method of establishing AMOs is educationally sound.
<i>Strengths</i>	<p>CORE's participating districts have agreed to employ a common set of CORE-developed AMOs (P. 48), which encourages comparability for appropriate ranking and identification of schools.</p> <p>In 2014-2015, CORE growth targets will be based on the expectation that students who are not academically proficient shall achieve better than typical (one year) growth toward closing the gap and achieving proficiency within four years or before graduation (whichever comes first, but this does not capture all students or what the actual expectation for growth is.</p>
<i>Weaknesses, issues, lack of clarity</i>	Although AMOs are listed, how they are calculated and how the targets will be set is not described, and CORE did not set a timeline for when final targets will be reached and whether the targets will be set for all students and all subgroups.

2.B	<p>Did the consortium describe a method of establishing AMOs that is educationally sound?</p> <ul style="list-style-type: none"> i. Did the consortium provide an adequate description of the method it will use to set its AMOs? ii. Did the consortium provide an educationally sound rationale for the pattern of academic progress that will be reflected in the new AMOs? iii. Will the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
	<p>CORE growth targets are based on non-proficient students making more than typical growth toward closing the achievement gap and being proficient (P. 51). However, there is no definition of typical growth or how that is measured and what will be considered “more than expected.” There is no method defined for determining the achievement gap and how gap closure will be demonstrated.</p> <p>CORE proposes to use transitional AMOs that will include the 2010-2011 adequate yearly progress (AYP) targets for math and ELA school and subgroup proficiency cut-points and the State of California Academic Performance Indicator (API). Schools must meet 67% proficiency for ELA and math and the API growth target. However, the request did not provide a clear description of how it would combine these two indicators to identify schools in 2012-2013.</p> <p>Beginning in the transition year (2013 – 2014), AMOs will be based on only the highest grade level at each school (P. 50). This may not account for all subgroups, and may provide a skewed picture of school performance.</p> <p>Current student proficiency rates were not included in the request.</p> <p>CORE has not provided information about how AMOs will be set for academic indicators or the social/emotional domain (P. 51).</p> <p>Because of the number of indicators that are not student outcome measures, descriptions of indicators, including the method for calculation as well as their weights, are necessary to determine whether academic progress will meet requirements.</p>

2.B	<p>Did the consortium describe a method of establishing AMOs that is educationally sound?</p> <ul style="list-style-type: none"> i. Did the consortium provide an adequate description of the method it will use to set its AMOs? ii. Did the consortium provide an educationally sound rationale for the pattern of academic progress that will be reflected in the new AMOs? iii. Will the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
	<p>CORE's request does not indicate the entity responsible for monitoring to ensure that districts collect the required data in a consistent manner as the system transitions to include non-cognitive measures.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should provide a data table for CORE districts as a whole and by each district, for all students and disaggregated by subgroups, demonstrating cross level growth data to highest grade level to ensure that lower grade levels are also meeting their AMOs.</p> <p>CORE should provide current proficiency rates for all students in CORE districts as a whole and each individual district, for all students and disaggregated by subgroups. CORE should consider providing this information for any new districts that join CORE at a later date.</p> <p>CORE should provide information about how AMOs will be set for academic indicators and the social/emotional domain.</p> <p>CORE should provide impact data on how school ratings will compare solely with academic domain indicators in the proposed system.</p>

2.C Reward Schools

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

2.C.i Peer Response

Response: (0 Yes; 6 No)

2.C.i	<p>Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools? If the SEA's methodology is not based on the definition of reward schools in <i>ESEA Flexibility</i> (but is instead, e.g., based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?</p> <p>a. Is the SEA's methodology for identifying reward schools educationally sound and likely to result in the meaningful identification of the highest-performing and high-progress schools?</p>
Response Component	Panel Response
<i>Rationale</i>	<p>It is unclear whether the process that CORE proposes to use to identify its Highest Achieving I, Highest Achieving II – Subgroups, and Fastest Improving – Overall and Traditionally Underserved Subgroups reward schools will result in the meaningful identification of the highest-performing and high-progress schools because, not knowing what the AMOs are and what the standards are, it makes it difficult to determine educational soundness. Again, because CORE is using the performance of only the highest grade level of a school, it is not clear if a school can be identified as highest achieving and still have significant achievement gaps in lower grades. CORE's method for identification of these schools does not take into consideration performance of all ESEA subgroups, and whether there are significant achievement gaps across subgroups that are not closing.</p> <p>CORE describes a method that takes into account a number of factors, but will change in 2014-2015 and no process is described for how the reward schools under the new system will be identified.</p>
<i>Strengths</i>	Elementary, middle and high schools are considered to be recognized as Schools of Distinction (P. 56).
<i>Weaknesses, issues, lack of clarity</i>	CORE's method for identifying Highest Achieving I schools ("all students"), Highest Achieving II – Subgroups schools ("all students group and at least two subgroups"), and Fastest Improving – Overall and

2.C.i	<p>Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools? If the SEA's methodology is not based on the definition of reward schools in <i>ESEA Flexibility</i> (but is instead, e.g., based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?</p> <p>a. Is the SEA's methodology for identifying reward schools educationally sound and likely to result in the meaningful identification of the highest-performing and high-progress schools?</p>
Response Component	Panel Response
	<p>Traditionally Underserved Subgroups schools (among top 20% of fastest improving schools overall OR for at least one subgroup AND met 90% of AMOs for the "all students" group and at least the same single subgroup) may allow schools that have significant achievement gaps across subgroups that are not closing to be identified (P. 56).</p> <p>CORE proposes that priority schools that make sufficient progress (all AMOs) are eligible to become reward schools (P. 58). This would allow a school that was identified as one of the worst performing to be recognized as a highest performing or high progress school before it has exited from priority status and demonstrated that it has sustained its improvement efforts.</p> <p>For the identification of reward schools (Highest Achieving – Reward Schools and Highest Achieving – Subgroups), proficiency on the Statewide assessments for all subjects and grades will be used (P. 56). However, CORE proposes using only test scores from the highest grade level of each individual school for accountability (P. 37).</p> <p>Because CORE districts will be using ELA and math scores from 2012-2013 and 2013-2014, reward schools will not be identified until after the 2013-2014 school year (P. 57).</p> <p>The list for 2013-2014 is determined based on Statewide assessment data. The common assessments will be used in future years but there is no explanation for how this will be done (P. 57).</p> <p>Per the MOU, it appears as if additional criteria can be added for districts to identify reward schools, which may make comparability in reward school designations difficult to determine.</p>
<i>Technical Assistance</i>	CORE should consider revising the method of identifying reward schools to take into consideration the

2.C.i	<p>Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools? If the SEA's methodology is not based on the definition of reward schools in <i>ESEA Flexibility</i> (but is instead, <i>e.g.</i>, based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?</p> <p>a. Is the SEA's methodology for identifying reward schools educationally sound and likely to result in the meaningful identification of the highest-performing and high-progress schools?</p>
Response Component	Panel Response
<i>Suggestions</i>	<p>performance of all ESEA subgroups, and whether there are significant achievement gaps across subgroups that are not closing.</p> <p>CORE should consider not allowing priority schools to be identified as reward schools until they have exited priority status.</p> <p>CORE should provide a communication plan with stakeholders indicating how it will clarify and explain how its school identification system aligns with the State's school designations, <i>e.g.</i>, a school in corrective action or restructuring per NCLB and what impact this will have on the school's intervention actions.</p> <p>CORE should clarify who makes the reward school designation — CORE or the districts.</p>

2.C.iii Peer Response*Response: (0 Yes; 6 No)*

2.C.iii	<p>Are the recognition and, if applicable rewards proposed by the SEA for its highest-performing and high progress schools likely to be considered meaningful by the schools?</p> <p>➤ <i>Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?</i></p>
Response Component	Panel Response

2.C.iii	<p>Are the recognition and, if applicable rewards proposed by the SEA for its highest-performing and high progress schools likely to be considered meaningful by the schools?</p> <p>➤ <i>Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?</i></p>
<i>Rationale</i>	The recognition and rewards proposed by CORE may not be considered meaningful by the schools, since CORE has not indicated that it has consulted with districts and schools in designing its recognition and rewards.
<i>Strengths</i>	<p>Reward schools, districts, and governing boards will be recognized locally and Statewide by CORE Board members, staff, and media (P. 57); however, it is not clear how the schools will be recognized, <i>e.g.</i>, via a website, press release, etc.</p> <p>Reward schools will also receive funds and professional development to develop coaching capacity to share successful practices with priority and focus schools (P. 57); however, these funds are proposed to be Title I, and it is unclear whether this will be an allowable use of funds.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>It may not be an allowable cost to use Title I funds to train staff in reward schools to develop their coaching capacity to share successful practices with priority and focus schools (P. 92).</p> <p>It is not clear if the rewards will provide incentive to teachers in the identified reward schools since no information was provided about how teachers were consulted about the duties of a reward school to provide support to priority and focus schools.</p>
<i>Technical Assistance Suggestions</i>	CORE should provide evidence that it consults with districts and practitioners on the proposed recognition and rewards to solicit feedback on whether the proposed rewards are considered meaningful.

2.D Priority Schools

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

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

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

- (i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;
- (ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;
- (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;
- (iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;
- (v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;
- (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and
- (vii) providing ongoing mechanisms for family and community engagement?

2.D.iii Peer Response

Response: (0 Yes; 6 No)

2.D.iii	Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools? a. Do the SEA's interventions include all components noted above (i.-vii.)??
Response Component	Panel Response

2.D.iii	<p>Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?</p> <p>a. Do the SEA's interventions include all components noted above (i.-vii.)??</p>
<i>Rationale</i>	<p>CORE provides a Pyramid of School Interventions generally aligned with the turnaround principles. However, the description of interventions in the waiver request is limited and therefore peers are unable to determine whether or not CORE will require interventions aligned with all of the turnaround principles, and, consequently, it is not likely that the interventions are likely to result in dramatic, systemic change.</p>
<i>Strengths</i>	<p>CORE proposes assigning a coaching/partner school and district team to each priority school and its district to integrate support (P. 62); however, it is not clear whether the coaching school will be appropriately identified based on the coaching school's strengths and the priority school's needs.</p> <p>The conceptual model for providing supports is based on a Response to Intervention (RtI) process. However, CORE did not provide enough description of how the model will be operationalized, <i>e.g.</i>, how will a school be closed or designated as a charter school.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>There is a two-year minimum for fully implementing interventions aligned with all of the turnaround principles (P. 58), rather than a three-year minimum.</p> <p>It is unclear whether or not a priority school that meets its AMOs and remains in the same year's improvement status, as described by CORE, will have to implement interventions aligned with all of the turnaround principles for three years.</p> <p>It is unclear whether or not CORE has a process for requiring schools from newly joined districts to implement interventions if identified as priority schools.</p> <p>The pyramid graphic (P. 59) shows two Tier 3 levels, rather than 1, 2, and 3.</p> <p>CORE's methodology does not include the 95% participation rate in the identification of priority schools.</p> <p>CORE's request is not clear on the capacity or role of the CORE staff or districts to support the number of schools that are identified within the consortium as priority. While peer coaching can be very effective, it can be time and resource intensive. CORE did not address safeguards it will put in place to make sure that</p>

2.D.iii	<p>Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?</p> <p>a. Do the SEA's interventions include all components noted above (i.-vii.)??</p>
	<p>undue hardships are not affecting high-performing partner schools in the implementation of the plan.</p> <p>The proposal indicates that the School Quality Review Model (P. 61) will be implemented to help focus and priority schools. It is not clear who will coordinate this process, facilitate coaching teams, and monitor to ensure that interventions are appropriate and implemented with fidelity.</p> <p>The model proposed to identify priority schools may include a range of school achievement profiles. CORE did not address how it will identify schools with 60% or lower graduation rates, even if they meet most targets.</p> <p>Tables 11, 12 and 17 are not clear with respect to defining which priority schools will be required to implement interventions aligned with all of the turnaround principles for three full years, because there are several categories of priority schools.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should require a three-year implementation of interventions aligned with all of the turnaround principles.</p> <p>CORE should provide evidence that priority schools will implement one of the school intervention models required under the School Improvement Grants (SIG) program or interventions aligned with all of the turnaround principles.</p> <p>CORE should consider including in section 2.D and in the MOU an explicit statement that priority schools will implement interventions aligned with all of the turnaround principles.</p> <p>CORE should provide information about how it will ensure that new districts joining the CORE participating districts will implement required interventions for a three-year period.</p> <p>CORE should clarify the tier levels on Figure 11 on page 59.</p> <p>CORE should provide specific detail about the roles of the organization and districts in the planning and coordination of the peer coaching supports and plan development. CORE should include a process to</p>

2.D.iii	<p>Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?</p> <p>a. Do the SEA's interventions include all components noted above (i.-vii.)??</p>
	<p>oversee the proper implementation and monitoring of district and school plans.</p> <p>CORE should create a set of criteria for selection of proven interventions that are consistent with the turnaround principles, focused on the specific needs of struggling learners that could lead to improvement of all students, including students with disabilities and English Learners.</p>

2.D.iii.b Peer Response*Response: (0 Yes; 6 No)*

2.D.iii.b	Are the identified interventions to be implemented in priority schools likely to — (i) increase the quality of instruction in priority schools; (ii) improve the effectiveness of the leadership and the teaching in these schools; and (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?
Response Component	Panel Response
<i>Rationale</i>	Since CORE has not identified interventions to be implemented, it is unclear whether the interventions are likely to increase the quality of instruction, improve the effectiveness of the leadership and teaching, and improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students.
<i>Strengths</i>	The School Quality Review model will be used to help priority schools work with their partnering Schools of Distinction (reward schools) to target areas for reform and intervention (P. 61). Parent transfer options begin the second year for focus and priority schools, as do options for restructuring, closing, or implementing a charter restart (P. 60), thus providing choice to parents.
<i>Weaknesses, issues, lack of clarity</i>	CORE provided examples of interventions that might be provided. The specific interventions will be developed by each individual school in time for preliminary implementation in fall 2013 (P. 61) and may therefore not be aligned with all of the turnaround principles. Although CORE has included a waiver to allow priority schools to operate schoolwide programs, its request indicates that supplementary supports will be provided to Title I students (P. 62), which may indicate a basic misunderstanding of implementation of comprehensive interventions and strategies in Title I schoolwide programs offered by this waiver and how the turnaround principles may be supported in schoolwide models.
<i>Technical Assistance Suggestions</i>	CORE should identify the specific interventions that are aligned with all of the turnaround principles and are to be implemented for three full years.

2.D.iii.b	Are the identified interventions to be implemented in priority schools likely to — (i) increase the quality of instruction in priority schools; (ii) improve the effectiveness of the leadership and the teaching in these schools; and (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?
	CORE should consider creating a list of proven interventions consistent with the turnaround principles that schools should or must follow that are likely to lead to improvement for all students, including English Learners, students with disabilities, and the lowest-achieving students.

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

2.D.iv Peer Response

Response: (0 Yes; 6 No)

2.D.iv	Does the SEA's proposed timeline ensure that LEAs that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year? ➤ <i>Does the SEA's proposed timeline distribute priority schools' implementation of interventions in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?</i>
Response Component	Panel Response
<i>Rationale</i>	The proposed timeline does not provide any information that would ensure that districts that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year because implementation years 1, 2, 3, 4, and 5 are not aligned to school years.
<i>Strengths</i>	Implementation of interventions in designated priority schools will begin fall 2013, which is a year earlier than required and spreads out implementation of interventions (P. 61).
<i>Weaknesses, issues, lack of clarity</i>	Preliminary implementation of interventions will begin in fall 2013, but there is no definition of what preliminary interventions means, nor is there a clear statement of when priority schools will be expected to be fully implementing a SIG model or interventions aligned with all of the turnaround principles (P. 61).

2.D.iv	<p>Does the SEA's proposed timeline ensure that LEAs that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year?</p> <p>➤ <i>Does the SEA's proposed timeline distribute priority schools' implementation of interventions in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?</i></p>
	<p>The proposed timeline does not address whether priority schools' implementation of interventions is balanced or distributed in such a way so that there is not a concentration of these schools in the later years of the timeline.</p> <p>There is no information provided that would ensure that districts that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year (P. 62).</p> <p>CORE's request does not address how it would ensure that new districts that join CORE and have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year.</p> <p>Since CORE will update its list of priority schools each year, it is not clear how CORE will ensure that districts have the capacity to support increasing numbers of priority schools.</p> <p>CORE provided via a phone call with the peers and subsequent written documentation that priority schools may come off of the list after the first year. It is unclear whether this reflects exiting priority status after one year and whether this strategy is consistent with the three-year implementation requirement.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should provide information as to what preliminary implementation of interventions is, as well as when priority schools will be expected to be fully implementing a SIG model or interventions aligned with all of the turnaround principles.</p> <p>CORE should address how priority schools' implementation of interventions is balanced or distributed in such a way so that there is not an improper concentration of these schools in the later years of the timeline.</p> <p>CORE should provide a discussion of how it will ensure that districts that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year.</p> <p>CORE should address how new districts that join CORE and have one or more priority schools will</p>

2.D.iv	<p>Does the SEA's proposed timeline ensure that LEAs that have one or more priority schools will implement interventions in each priority school no later than the 2014–2015 school year?</p> <p>➤ <i>Does the SEA's proposed timeline distribute priority schools' implementation of interventions in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?</i></p>
	implement interventions in each priority school no later than the 2014–2015 school year.

2.D.v Peer Response*Response: (0 Yes; 6 No)*

2.D.v	<p>Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?</p> <p>a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?</p> <p>➤ <i>Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?</i></p>
Response Component	Panel Response
<i>Rationale</i>	<p>Because the request does not require that a priority school's "all students" group meet proficiency targets, it is unclear whether the proposed criteria will ensure that schools that exit priority status have made significant progress in improving student achievement.</p> <p>The criteria for exiting priority status are described, but are not fully developed.</p>
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>The AMO indicators have not been determined, and as a result, targets cannot be established for exit criteria.</p> <p>The request does not indicate that, in order to exit priority status, the "all students" group must meet proficiency targets.</p> <p>In order to exit priority status, schools must meet AMOs – growth measures (once those are defined) (P. 62). It is difficult to determine if these AMOs will ensure that priority schools have made significant progress in improving student achievement since they have yet to be defined.</p>

2.D.v	<p>Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?</p> <p>a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?</p> <p>➤ <i>Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?</i></p>
Response Component	Panel Response
<i>Technical Assistance Suggestions</i>	<p>CORE should define AMOs and establish the targets. It should demonstrate that the targets that must be reached in order to exit priority status are set in such a way as to ensure that schools that meet the exit criteria make progress on the academic domain for all students and all subgroups.</p>

2.E Focus Schools

2.E.i Peer Response

Response: (0 Yes; 6 No)

2.E.i	<p>Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools? If the SEA's methodology is not based on the definition of focus schools in <i>ESEA Flexibility</i> (but is instead, e.g., based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?</p> <p>a. <i>Note to Peers: Staff will review 2.E.i.a.</i></p> <p>b. Is the SEA's methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?</p>
Response Component	Panel Response
<i>Rationale</i>	<p>The method for determining focus schools is incomplete; consequently, it is unclear whether the methodology for identifying focus schools is educationally sound and will ensure that schools are accountable for the performance of subgroups of students.</p> <p>Since CORE is proposing to use only the proficiency rates for only the highest grade in the school, this may not address subgroup achievement gaps that are present in other grades, or in the school as a whole.</p> <p>CORE has not described a process for how it will determine identification of focus schools beginning in 2014-2015 when it transitions to a new identification system.</p>
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>CORE proposes to use proficiency rates for only the highest grade in the school. This may not address subgroup achievement gaps that are present in other grades.</p> <p>It is not clear whether all Title I high schools that have graduation rates below 60% and are not identified as priority schools will be identified as focus schools.</p>

2.E.i	<p>Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools? If the SEA’s methodology is not based on the definition of focus schools in <i>ESEA Flexibility</i> (but is instead, <i>e.g.</i>, based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools Meet ESEA Flexibility Definitions” guidance?</p> <p>a. <i>Note to Peers: Staff will review 2.E.i.a.</i></p> <p>b. Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?</p>
Response Component	Panel Response
	<p>Since CORE will annually identify focus schools, it is unclear how districts will ensure that there is adequate capacity to support increasing numbers of focus schools.</p> <p>The components and weightings are not fully developed for AMOs, nor is “n-size” defined for subgroups.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should consider using the assessment results from all grades in the method to identify focus schools rather than just the results from the highest grade.</p> <p>CORE must identify as focus schools all Title I high schools with graduation rates below 60% that are not identified as priority schools.</p> <p>CORE should provide information on how it will ensure that there is adequate capacity to support increasing numbers of focus schools.</p>

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

2.E.iii Peer Response*Response: (0 Yes; 6 No)*

2.E.iii	<p>Does the SEA's process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2013–2014 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?</p> <ul style="list-style-type: none"> ➤ <i>Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?</i> ➤ <i>Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?</i>
Response Component	Panel Response
<i>Rationale</i>	It is unclear whether each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2013–2014 school year. Since the request has not identified any interventions, it is unclear whether interventions will be based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities.
<i>Strengths</i>	<p>CORE has presented examples of partnerships that have proven effective through collaboration to improve academic achievement (P. 19-20). However, there is no description of how these strategies will be used to improve interventions delivered in all focus schools.</p> <p>CORE proposes assigning a coaching/partner school and district team to each focus school and district to integrate support (P. 62); however, it is not clear whether the coaching school will be appropriately identified based on the coaching school's strengths and the focus school's needs.</p> <p>The conceptual model for providing supports is based on an RtI process, with all schools receiving tier one treatment.</p>
<i>Weaknesses, issues, lack of</i>	It is unclear whether the generally described possible interventions are research-based to be able to meet the

2.E.iii	<p>Does the SEA's process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2013–2014 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?</p> <ul style="list-style-type: none"> ➤ <i>Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?</i> ➤ <i>Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?</i>
Response Component	Panel Response
clarity	<p>needs of the subgroups whose performance led to the identification as a focus school.</p> <p>It is unclear whether or not a focus school that meets its AMOs and remains in the same year's improvement status, as designated by CORE, will have to continue to implement interventions aligned with subgroup needs.</p> <p>It is unclear whether or not CORE has a process for ensuring that schools from newly joined districts implement interventions if identified as focus schools.</p> <p>The pyramid graphic (P. 59) shows two Tier 3 levels, rather than 1, 2, and 3.</p> <p>CORE does not include the 95% participation rate in the identification of focus schools.</p> <p>CORE's request is not clear on the capacity or role of the CORE staff or districts to support the number of schools that are identified within the consortium as focus schools. While peer coaching can be very effective, it can be time and resource intensive. CORE did not address safeguards it will put in place to make sure that undue hardships are not affecting high-performing partner schools in the implementation of the plan.</p> <p>The proposal indicates that the School Quality Review Model (P. 61) will be implemented to help focus and priority schools. It is not clear who will coordinate this process, facilitate coaching teams, and monitor to</p>

2.E.iii	<p>Does the SEA's process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2013–2014 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?</p> <ul style="list-style-type: none"> ➤ <i>Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?</i> ➤ <i>Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?</i>
Response Component	Panel Response
	<p>ensure that interventions are appropriate and implemented with fidelity.</p> <p>CORE did not provide enough description of its RtI model and how it will be operationalized, or how the intervention options will specifically meet the needs of subgroups, e.g., how will a school be closed or designated as a charter school or how the supports will support implementation of interventions aligned with subgroup needs.</p> <p>The model proposed to identify focus schools may include a range of school achievement profiles rather than those with low subgroup achievement, subgroup achievement gaps or those that are Title I high schools with 60% or lower graduation rates that are not already identified as priority schools.</p> <p>Tables 12, 15, 16 and 17 are not clear with respect to defining which focus schools will be required to implement interventions aligned with the reason for identification because there are several categories of focus schools.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should provide information on how it will ensure that its districts implement interventions in all of their focus schools at the start of the 2013-2014 school year.</p> <p>CORE should provide clarification on how reward schools (who are identified annually) will be able to support focus schools during the entire intervention cycle.</p> <p>CORE should clarify how Needs Improvement – Level 2 and Needs Improvement – Level 1 schools are</p>

2.E.iii	<p>Does the SEA's process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2013–2014 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?</p> <ul style="list-style-type: none"> ➤ <i>Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?</i> ➤ <i>Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?</i>
Response Component	Panel Response
	<p>identified, and how CORE will ensure that its LEAs have the capacity to support these schools in addition to focus and priority schools.</p> <p>CORE should clearly require that focus schools implement interventions aligned with the reason for identification.</p> <p>CORE should describe how it will ensure that new districts that join CORE will be “up to speed” in terms of identifying and providing interventions in focus schools.</p> <p>CORE should provide a list of the research-based strategies that will be used in focus schools as interventions to increase the likelihood that gaps for students with disabilities, English Learners and low-achieving students will be closed and that instruction will be improved.</p>

2.E.iv Peer Response*Response: (0 Yes; 6 No)*

2.E.iv	<p>Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?</p> <p>a. Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?</p> <p>➤ <i>Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?</i></p>
Response Component	Panel Response
<i>Rationale</i>	<p>The criteria for exiting focus school status do not ensure that schools that exit that status have made significant progress in improvement student achievement and narrowing achievement gaps.</p> <p>The criteria for exiting focus status are described, but some are optional, so it is unclear which apply.</p>
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>The AMO indicators have not been determined, and, as a result, targets cannot be established for exit criteria.</p> <p>The request does not indicate that, in order to exit focus status, subgroups must meet proficiency targets.</p> <p>The criteria to exit focus status appear to be set forth on page 66 of the request, but page 73 sets forth alternative "recommended" focus school exit criteria, which makes it difficult to discern which criteria actually apply.</p> <p>The criteria do not ensure that, in a school that exits focus status, (1) the subgroup whose performance led to the identification as a focus school must improve, (2) achievement gaps and low subgroup achievement do not persist, and (3) the school is making significant progress in improvement student achievement and narrowing achievement gaps.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should define AMOs and establish the targets. It should demonstrate that the targets that must be reached in order to exit focus status are set in such a way as to ensure that schools make progress on the academic domain for all students and all subgroups.</p> <p>CORE should clarify which exit criteria apply and which do not.</p>

2.E.iv	<p>Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?</p> <p>a. Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?</p> <p>➤ <i>Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?</i></p>
Response Component	Panel Response
	<p>CORE should provide data showing that when schools meet the exit criteria, low subgroup achievement and achievement gaps do not persist.</p>

2.F Provide Incentives and Support for other Title I Schools**2.F.i Peer Response***Response: (0 Yes; 6 No)*

2.F.i	Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?
Response Component	Panel Response
<i>Rationale</i>	It is unclear whether CORE Title I schools that are not priority or focus schools but are rated as in need of support or assistance are identified based on the AMOs and other measures. The MOU for participating LEAs does not mention expectations for identifying and supporting other Title I schools that are not making progress in improving student achievement and narrowing achievement gaps.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>It is unclear whether CORE Title I schools that are not priority or focus schools but are rated as in need of support or assistance are identified based on the AMOs and other measures.</p> <p>The request does not provide information regarding what supports and incentives will be provided specifically to Title I schools that, based on the AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps.</p> <p>The request does not identify any funding sources for the supports to be provided to other Title I schools (P. 73).</p> <p>The MOU for participating LEAs does not mention expectations for identifying and supporting other Title I schools that are not making progress in improving student achievement and narrowing achievement gaps (P. 91).</p>
<i>Technical Assistance</i>	CORE should clarify whether CORE Title I schools that are not priority or focus schools but are rated as in

2.F.i	Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?
Response Component	Panel Response
<i>Suggestions</i>	<p>need of support or assistance are identified based on the AMOs and other measures.</p> <p>CORE should identify supports and incentives that will be provided specifically to Title I schools that, based on the AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps.</p> <p>CORE should provide information on funding sources available for activities mentioned on page 73.</p> <p>CORE should consider revising the MOU for participating LEAs to include expectations for identifying and supporting other Title I schools that are not making progress in improving student achievement and narrowing achievement gaps.</p>

2.F.ii Peer Response*Response: (0 Yes; 6 No)*

2.F.ii	Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?
Response Component	Panel Response
<i>Rationale</i>	CORE's request does not provide information on how incentives and supports will impact the quality of instruction for students with disabilities, English Learners and low achieving students. Therefore, it is not possible to determine if CORE's plan will improve student achievement, close achievement gaps and increase the quality of instruction for all students, including English Learners and students with disabilities.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	The request mentions general activities that will be provided, but CORE has not provided information on specific interventions and how the interventions and supports will address closing achievement gaps and increasing the quality of instruction for all students, including English Learners and students with disabilities

2.F.ii	Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?
Response Component	Panel Response
	(P. 73). Incentives and supports that differ are not described relative to other Title I schools because so much of this section describes options for Focus and Priority schools.
<i>Technical Assistance Suggestions</i>	CORE should provide information on the specific interventions and how the interventions and supports will address closing achievement gaps and increasing the quality of instruction for all students, including English Learners and students with disabilities.

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

- 2.G** Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?
- Is the SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?
 - *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*
 - Is the SEA's process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?
 - Is the SEA's process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G Peer Response

Response: (0 Yes; 6 No)

2.G	Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity? (including components i.-iii. above)
Response Component	Panel Response

2.G	Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity? (including components i.-iii. above)
Response Component	Panel Response
<i>Rationale</i>	The CORE philosophy is for districts and schools to 'promise' to hold each other accountable (P. 25). Based on the limited description provided for interventions and supports and the fact that AMOs have not been determined, it is not possible to determine if the process will yield improvements in student achievement. Additionally, there was no mention of evaluation or review of implementation other than by peers. Therefore, there is no system to drive the sweeping changes that are envisioned, including building the capacity of districts and schools to eliminate disparity and disproportionality.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	<p>The request does not address the process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools.</p> <p>The request does not provide information about the process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the differentiated recognition, accountability, and support system.</p> <p>The request does not address how Federal, State, and local funds, including funds the district was previously required to reserve under ESEA section 1116(b)(10), will be leveraged to support implementation of interventions in priority schools, focus schools, and other Title I schools.</p> <p>The request does not provide information about the process that will be used for holding districts accountable for improving school and student performance, particularly for turning around their priority schools.</p> <p>The request does not describe the process for the rigorous review and approval of any external providers used by CORE and its participating districts to support the implementation of interventions in priority and focus schools.</p> <p>Though external providers are part of the plan, there is not a description for the rigorous review and</p>

2.G	Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity? (including components i.-iii. above)
Response Component	Panel Response
	<p>approval of those providers.</p> <p>The process of shared accountability, though positive in itself, may prove to be challenging if the expected academic progress is not met over time.</p>
<i>Technical Assistance Suggestions</i>	<p>CORE should describe the process for ensuring timely and comprehensive monitoring of, and technical assistance for, district implementation of interventions in priority and focus schools.</p> <p>CORE should provide information about the process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the differentiated recognition, accountability, and support system.</p> <p>CORE should provide information about how Federal, State, and local funds, including funds the LEA was previously required to reserve under ESEA section 1116(b)(10), will be leveraged to support implementation of interventions in priority schools, focus schools, and other Title I schools.</p> <p>CORE should describe the process that will be used for holding districts accountable for improving school and student performance, particularly for turning around their priority schools.</p> <p>CORE should describe the process for the rigorous review and approval of any external providers used by CORE and its participating districts to support the implementation of interventions in priority and focus schools.</p> <p>CORE should consider adding more detail to its request that includes the actions that the collaborative will engage in to create the pedagogical shifts underscoring its beliefs about the challenges of disparity and disproportionality, including the resources that will be created and available to coaching teams, principals, teachers, and parents, any professional development that will be available, and how these actions and outcomes will be coordinated and monitored and entities responsible.</p>

Principle 2 Overall Review

PRINCIPLE 2 OVERALL REVIEW Peer Response*Response: (0 Yes; 6 No)*

Principle 2 Overall Review	Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
<i>Rationale</i>	<p>Because many of the details of CORE's proposed accountability system are yet to be developed, it is unclear as to whether the system is likely to improve student achievement or close achievement gaps. CORE's accountability system will not consider all students and may not consider all subgroups, but, rather, only the highest grade in each of its schools. The request indicates that districts will be required to meet certain requirements related to accountability, but has no process to ensure that its districts meet the requirements. CORE proposes to identify priority and focus schools each year, but has not addressed whether its districts have the capacity to provide support to an increasing number of schools.</p> <p>The plan needs additional development to be coherent and comprehensive in supporting continuous improvement.</p>
<i>Strengths</i>	<p>CORE proposes to create a dual K-12 information system (district-level and CORE-level) that all partner districts will access. An outside contractor has already been negotiated.</p> <p>CORE's plan is rooted in shared learning and shared responsibility for student achievement, looking for innovative ways to collaborate and meet the moral imperatives to prepare all students for successful futures.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The system for school accountability has not been well thought out with respect to inclusion of specific indicators, calculation of those indicators, and potentially perverse incentives — specifically, using only the highest grade level for accountability, reliance on input measures, and failure to define the weightings. This results in an inability to develop a process or identify reward, priority and focus schools.</p> <p>The capacity of CORE and districts may not be sufficient to address all of the elements required to fully design and operationalize the accountability system in time to successfully implement by the 2013-2014</p>

Principle 2 Overall Review	Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
	<p>school year.</p> <p>There is no clear implementation intervention plan, with the exception of partnering of schools to ensure the implementation of interventions and monitoring of strategies in priority and focus schools.</p> <p>CORE did not address how districts and schools will be able to comply with three accountability systems and the associated improvement plans that may be required. Given that a school may be identified in multiple categories, CORE did not provide a plan to communicate to the public what is required.</p>
<i>Technical Assistance Suggestions</i>	See technical assistance provided in each principle's section.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A** (the SEA has not already developed and adopted all of the guidelines consistent with Principle 3):

3.A.i, Option A.i Peer Response

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

Response: (0 Yes; 6 No)

3.A.i, Option A.i	Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2012–2013 school year
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Response Component	Panel Response
<i>Rationale</i>	<p>CORE states it will have plans to have the educator evaluation systems implemented at the end of the 2015-2016 school year. CORE provides a list of recommended components it will adopt but does not provide a plan for developing and adopting guidelines by the end of the 2012-2013 school year. CORE does not provide guidelines for districts to develop their educator evaluation systems, <i>e.g.</i>, a list of measures that may be used for student growth.</p>
<i>Strengths</i>	<p>According to the request, “it is the intent of the Participating LEAs to fully incorporate the Stull Act to support teacher development and ensure effective instruction in every classroom.”</p> <p>CORE districts have the legal authority to implement educator evaluation systems using student outcome data under the Stull Act.</p> <p>By signing the MOU, CORE districts will commit to establishing new generation evaluation systems that are consistent with Principle 3: (1) a significant component based on a measure of student growth, (2) classroom observations with feedback loops, (3) differentiated performance levels.</p> <p>CORE will provide partner districts with ongoing technical assistance on developing and implementing educator evaluation systems.</p> <p>The participating districts have agreed to implement an evaluation system for superintendents as well as for teachers and principals.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>CORE does not provide guidelines for districts to develop their educator evaluation systems; CORE just lists a set of indicators it will adopt but does not provide a comprehensive set of guidelines (P. 79).</p> <p>CORE does not provide a detailed plan or timeline to indicate when guidelines would be developed in the next three months, how stakeholders would be involved in development, how the peer review process would occur, and how CORE would determine how districts would adopt the guidelines, <i>e.g.</i>, it is unclear if local school boards have to approve the guidelines or if the State might have any role in the adoption of the guidelines.</p> <p>CORE does not provide a sense of how far along it is in the process of developing and adopting a common set of guidelines for educator evaluation systems.</p>

<p>3.A.i, Option A.i</p>	<p>Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2012–2013 school year</p>
<p>Response Component</p>	<p>Panel Response</p>
	<p>If the purpose is to collaborate and leverage expertise, it would seem reasonable that CORE would pool data and strategies, but this is not indicated.</p> <p>Peer review process is not specified in the waiver request. Therefore, there is a question of the validity and reliability of the peer review process.</p> <p>Each CORE district will be developing its own educator evaluation system for implementation at the end of the 2015-2016 school year (P. 77). If there is not a common framework for educator evaluation, it will be very difficult to target support to each district. While CORE believes this a strength and one-size-fits-all models do not work, it is contrary to a collaborative approach to improving student achievement. The inability to compare teachers across the CORE districts may yield false conclusions about effective practices and reforms.</p> <p>Some of the multiple measures of the educator evaluation may include are teacher attendance, student attendance, self-evaluations, measures of commitment to collaboration and persistence rates (P. 78). Many of these measures are inputs, and not researched based. The persistence rates may result in students being moved on in grade progression when they are not ready because if they are not, it will negatively impact the educator's evaluation. And, educators should not be rewarded just for coming to work. While self-evaluations are important for reflection, they may not reflect a true effectiveness rating.</p> <p>CORE believes that student outcomes cannot be included in educator evaluation until common assessments are in place (PP. 76 and 78). It is unclear why CORE is delaying the use of student outcome measures in educator evaluations. It is not necessary to wait for common assessment data, state and district assessment can be used. By waiting for common assessment data, the educator evaluation system will not be implemented with student achievement measures for four years.</p> <p>If a district does not adopt the guidelines, it is not clear what consequences are in place. The CORE</p>

<p>3.A.i, Option A.i</p>	<p>Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2012–2013 school year</p>
<p>Response Component</p>	<p>Panel Response</p>
	<p>waiver request does not provide a status for each district on their progress in adopt guidelines by the end of the current school year (2012-2013). The success of educator evaluation systems ultimately rests on the buy-in of stakeholders including school boards and teacher associations and often requires action to modify local education regulations. Therefore, the MOU contained in this request should not be viewed as the guidelines for developing and implementing evaluation systems. The MOU may not reflect an accurate picture of district progress in adopting guidelines.</p> <p>Many of the provisions within an educator evaluation system including how educators are rated and the consequences of those rating in personnel decisions are often subject to collective bargaining agreements. CORE does not provide a status by district of CBAs, association support of CORE's proposed framework, or the negotiation schedules.</p> <p>CORE does not address its capabilities to provide technical assistance to current or future partner districts to develop their evaluation and support systems.</p> <p>CORE recommends that partner districts modify their existing educator evaluation systems to include student achievement as one significant component of the multiple measures (P. 76). However, CORE does not explicitly state the types of measures, the weighting of the measures, or how these will be consistent across CORE districts.</p> <p>Long Beach school district has an educator evaluation system that will be fully implemented in 2013-2014 (P. 79). (Includes at least three formal and other informal observations, includes student achievement measures.) However, there is no clear indication on how or if this information will be used to inform the development of educator evaluator systems in partner CORE districts.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>Please consider a consistent system of educator evaluation, at least for the student outcomes measure, so effectiveness can truly be compared across CORE districts for better policy decisions to be made about teacher placement and effective practices. It will also help with creating professional</p>

3.A.i, Option A.i	Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2012–2013 school year
Response Component	Panel Response
	<p>development opportunities and evaluating programs.</p> <p>Please describe how CORE will review district developed education evaluation plans to ensure they are rigorous and consistent with waiver provisions.</p> <p>Please provide in the guidelines details on how professional development opportunities will be identified for teachers in the lowest performance category and how the plans will be individualized and implemented.</p> <p>Also provide how the guidelines will include performance categories.</p> <p>CORE should provide a summary of the progress each district has made in adopting guidelines for implementing evaluation systems consistent with the waiver requirements.</p> <p>For each of the multiple measures, CORE should provide a list of the measures that can be used and the districts can articulate which specific measures they will use, the specific weights of the measures and the tools used to implement the measures.</p>

3.A.i, Option A.ii Peer Response

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

Response: (0 Yes; 6 No)

3.A.i, Option A.ii	Does the SEA's plan include sufficient involvement of teachers and principals in the development of these guidelines?
Response Component	Panel Response
<i>Rationale</i>	<p>CORE has not provided a clear plan for how it will include sufficiently the involvement of teachers and principals in the development of the CORE guidelines. The waiver request states that each CORE district will work with district administrators and teachers to design, refine, and/or train staff prior to developing district guidelines and fully implementing evaluation systems. There is no detail on when or how administrators and teachers will be engaged or what they will be providing input and guidance on.</p> <p>In addition, there is no indication that the list of components included on page 79 will be created with the involvement of teachers and principals.</p>
<i>Strengths</i>	<p>CORE districts have stated they will involve administrators and teachers in the development of the evaluation system (P.82).</p> <p>Los Angeles Unified School District (LAUSD) has begun a pilot of its new teacher evaluation system and has gained feedback from teachers (P. 82). However, there is no clear indication on how or if this information will be used to improve LAUSD's evaluation system or inform the development of educator evaluator systems in partner CORE districts.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>Although the request indicates the involvement of educators, CORE's plan does not offer details to indicate how this will happen within each district. Nor does the request indicate the responsible entities for monitoring that the information is communicated to teachers and principals, that teachers and principals are engaged in all aspects of the planning and piloting, and how feedback will be used to make adjustments.</p> <p>No detail is provided about when or how CORE districts will engage administrators and teachers in the development of the evaluation system. While CORE indicates that each district will engage with its communities, it is not clear how much engagement has already occurred across and within the partner districts. CORE and district guidelines need to be adopted by the end of 2012-2013 school year to meet</p>

3.A.i, Option A.ii	Does the SEA's plan include sufficient involvement of teachers and principals in the development of these guidelines?
Response Component	Panel Response
	the waiver requirements; this may not give districts adequate time for meaningful outreach and engagement of educators. CORE's flexibility request does not contain letters from organizations that represent teachers and principals in the partner districts indicating that they had any involvement in developing the CORE framework or were supportive of it.
<i>Technical Assistance Suggestions</i>	CORE should provide details on when or how CORE and its districts will engage administrators and teachers in the development of the guidelines and implementation of the evaluation systems. CORE should provide information as to what components of the evaluation systems administrators and teachers will have input on.

i. Note to Peers: Staff will review iii.

If the SEA selected **Option B** (the SEA has developed and adopted all guidelines consistent with Principle 3):

3.A.i, Option B.i Peer Response

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

Response: (Yes or No)

3.A.i, Option B.i	Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A

3.A.i, Option B.i	Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement?
Response Component	Panel Response
<i>Technical Assistance Suggestions</i>	N/A

3.A.i, Option B.ii: ED Staff will review B.ii. [Evidence of adoption of final guidelines by the SEA]

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

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

Response: (Yes or No)

3.A.i, Option B.iii	Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

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

3.A.ii.a Peer Response

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

Response: (Yes or No)

3.A.ii.a	<p>Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will....be used for continual improvement of instruction?</p> <p><u>Consideration:</u></p> <p>➤ <i>Are the SEA's guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?</i></p>
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

3.A.ii.b Peer Response

☒ Not applicable because the SEA selected 3.A, Option A
 Response: (Yes or No)

3.A.ii.b	<p>Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will....meaningfully differentiate performance using at least three performance levels?</p> <p><u>Consideration:</u></p> <p>➤ <i>Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?</i></p>
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance</i>	N/A

3.A.ii.b	<p>Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...meaningfully differentiate performance using at least three performance levels?</p> <p><u>Consideration:</u></p> <p>➤ Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?</p>
Response Component	Panel Response
<i>Suggestions</i>	

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

3.A.ii.c.(i) Peer Response

☒ Not applicable because the SEA selected 3.A, Option A
 Response: (Yes or No)

3.A.ii.c.(i)	Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?
Response Component	Panel Response
<i>Rationale</i>	
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance</i>	N/A
<i>Suggestions</i>	
	N/A

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

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

Response: (Yes or No)

3.A.ii.c(ii)	For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

3.A.ii.c(iii) Peer Response

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

Response: (Yes or No)

3.A.ii.c(iii)	For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

3.A.ii.d Peer Response

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

Response: (Yes or No)

3.A.ii.d	Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — i.e., will they promote systems that will....evaluate teachers and principals on a regular basis?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

3.A.ii.e Peer Response

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

Response: (Yes or No)

3.A.ii.e	<p>Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — i.e., will they promote systems that will....provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?</p> <p><u>Considerations:</u></p> <ul style="list-style-type: none"> ➤ Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice? ➤ Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

3.A.ii.f Peer Response

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

Response: (Yes or No)

3.A.ii.f	Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — i.e., will they promote systems that will....be used to inform personnel decisions?
Response Component	Panel Response
<i>Rationale</i>	N/A
<i>Strengths</i>	N/A
<i>Weaknesses, issues, lack of clarity</i>	N/A
<i>Technical Assistance Suggestions</i>	N/A

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

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

Considerations:

- *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
- *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English*

Learners, are included in the LEA's teacher and principal evaluation and support systems?

- *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2014–2015 school year in preparation for full implementation of the evaluation and support systems consistent with the requirements described above no later than the 2015–2016 school year; or (2) implementing these systems no later than the 2014–2015 school year?*
- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B Peer Response

Response: (0 Yes; 6 No)

3.B	Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? <i>(See italicized considerations above.)</i>
Response Component	Panel Response
<i>Rationale</i>	CORE's processes for ensuring that each district develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems have not been developed. Therefore, it is not possible to determine if they are likely to lead to high-quality local teacher and principal evaluation and support systems.
<i>Strengths</i>	The CORE districts intend to implement the educator evaluation and support systems by 2014–2015 with reporting beginning in 2015–2016 (P.84). (However, no details are provided about how the system is going to be developed or reviewed, or how it will be implemented, to ensure it is consistent with the principles.)
<i>Weaknesses, issues, lack of</i>	Comprehensive remediation plans for teachers in the lowest-performance category will be implemented (P.

3.B	Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? (<i>See italicized considerations above.</i>)
Response Component	Panel Response
<i>clarity</i>	<p>82). Details on how the performance categories are determined and defined are not provided and how/what type of professional development will be provided to teachers in this lowest category are not described. Professional development needs differ by teacher and need to be individual plans.</p> <p>CORE does not have a process for reviewing and approving districts' educator evaluation and support systems to ensure that they are consistent with the waiver guidelines and will result in the successful implementation of such systems. Instead, the waiver alludes to a 'peer-review' process to ensure evaluation systems are aligned with the CORE/district MOU (P. 84). However, there are no details provided about how the peer review process will occur and what will happen with the findings of the peer review process.</p> <p>CORE provided two examples of district pilots but CORE does not provide information about how it will use lessons learned to inform the development of its guidelines. CORE does not describe a process for ensuring the districts develop, adopt, pilot, and implement their educator evaluation and support systems with the involvement of educators.</p> <p>CORE does not describe a process it will use to ensure that all measures of educator effectiveness are valid and related to increasing student achievement and are implemented uniformly across schools and districts.</p> <p>The waiver request does not specifically address the needs of teachers working with students with disabilities, English Learners, and historically under-achieving populations of students in the districts' teacher and principal evaluation and support systems.</p> <p>Other than the general timeline of implementation in 2014-2015, few details are provided about how districts are developing or implementing the evaluation systems (PP. 83 and 84).</p> <p>CORE does not describe any plans for providing guidance and technical assistance to districts in developing and implementing educator evaluation and support systems.</p>

3.B	Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? (<i>See italicized considerations above.</i>)
Response Component	Panel Response
	CORE's request does not adequately address the progress of each of the partner districts to develop, adopt, pilot, and implement an evaluation system. For example, if a district has not formally adopted guidelines, developed a student growth measure, or selected an observational rubric, it may not be on track to pilot the system by 2014-2015. If piloting does not occur until 2014-2015, districts may not have adequate time to obtain feedback to inform the final system scheduled for implementation by 2015-2016.
<i>Technical Assistance Suggestions</i>	<p>The request could be strengthened by including the following, including a description of:</p> <p>The process that CORE will use to ensure that all measures used in evaluation systems are valid and related to increasing student achievement of all students, specifically English Learners, students with disabilities and low-performing students, and are implemented uniformly across schools and districts.</p> <p>A different process, if any, for ensuring that teachers working with special populations of students are included in evaluation and support systems.</p> <p>Additional details about districts' timelines for developing their educator evaluation and support systems as well as implementation timeline details.</p> <p>Plans for providing guidance and technical assistance to districts in developing and implementing educator evaluation and support systems.</p> <p>Additional details about how the evaluation systems will be developed and piloted prior to implementation to ensure feedback is included before the evaluation systems are fully implemented.</p> <p>Details on the process for reviewing and approving each district's educator evaluation system, including the peer review process.</p> <p>Details on how CORE will ensure districts develop, adopt, pilot, and implement educator evaluation and</p>

3.B	Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? (<i>See italicized considerations above.</i>)
Response Component	Panel Response
	support systems with the involvement of educators.

Principle 3 Overall Review**Principle 3 Overall Review Peer Response***Response: (0 Yes; 6 No)*

Principle 3 Overall Review	Are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response

Principle 3 Overall Review	Are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
<i>Rationale</i>	CORE plans to have the educator evaluation systems implemented at the end of the 2015-2016 school year. However, CORE has yet to adopt guidelines and issue guidance to districts for the adoption of educator evaluation systems. Furthermore, then districts will have to adopt their own guidelines and develop the educator evaluation systems, which are also subject to local approval requirements and collective bargaining agreements. Given that CORE's flexibility request requires district guidelines be adopted by the end of the 2012-2013 school year, it is unlikely that its districts can adopt guidelines on that timeline.
<i>Strengths</i>	<p>CORE proposes a strong system that includes multiple measures of achievement and growth.</p> <p>There is existing legislation that evaluations should include progress on academic standards based on Statewide assessments. Certificated teachers of students with disabilities and English Learners are included in the Stull Act's mandates to measure educator performance.</p> <p>District superintendents have agreed in principle, through a Memorandum of Understanding (MOU), to adopt components of the educator evaluation systems that align with Principle 3 requirements. The MOU states that educator effectiveness ratings from evaluations are to be included in staffing decisions such as recruitment, promotion, tenure, transfer, lay-off and dismissal.</p> <p>CORE's plan includes tracking, beginning no later than 2014-2015, the districts' aggregate teachers and principals by performance level and will report these publicly by 2015-2016.</p> <p>CORE does have successful models of educator evaluation systems in some districts.</p>
<i>Weaknesses, issues, lack of clarity</i>	CORE indicates that districts will select their own measures of educator effectiveness but did not indicate how it will ensure that all measures used in a district's evaluation and support systems are valid, meaningful measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within the district.

Principle 3 Overall Review	Are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
	<p>Each CORE district will develop its own educator evaluation system for implementation at the end of the 2015-2016 school year (P. 77). There is not a common framework for educator evaluation, so it will be very difficult to target support to each district. While CORE believes this is a strength and one-size-fits-all models do not work, it is contrary to a collaborative approach to improving student achievement. The inability to compare teachers across the CORE districts may yield false conclusions about effective practices and reforms.</p> <p>Some of the multiple measures an educator evaluation may include are teacher attendance, student attendance, self-evaluations, measures of commitment to collaboration, and persistence rates (P. 78). Many of these measures are inputs, and are not research based. The persistence rates may result in students being moved on in grade progression when they are not ready because, if they are not, it will negatively impact an educator's evaluation. And, educators should not be rewarded just for coming to work. While self-evaluations are important for reflection, they may not reflect a true effectiveness rating.</p> <p>There is a lack of evidence that teachers and their representatives were involved in the conversations about the evaluation systems. CORE did not offer evidence about how it will include teachers in the development of CORE's guidelines. While the request indicates that districts would be required to include teachers in the development of the district guidelines, there is nothing specific in the MOU that indicates that the districts would have to do this.</p> <p>Evidence does not support that the development and adoption of the districts' educator evaluation systems guidelines by the end of the 2012-2013 school year will occur.</p>
<i>Technical Assistance Suggestions</i>	See technical assistance provided in each principle's section.

Overall Evaluation of Request**Overall Evaluation Peer Response**

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

Overall Evaluation	Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA's approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
<i>Rationale</i>	<p>CORE presents a thoughtful rationale based on the work of Michael Fullan that informs improving learning for all students, which is imperative for college and career readiness. The current CORE superintendents appear to have a vision that will result in cross-district collaborative efforts. However, the request falls short across the three principle areas in significant ways.</p> <p>CORE's request exhibited evidence that Principle 1 will likely lead to successful implementation of the CCSS in nine districts. CORE should ensure that the needs of English Learners, students with disabilities and low achieving students are met and that CORE and individual districts have the capacity to implement these transition activities.</p> <p>CORE's waiver request lacks significant detail to determine if Principles 2 and 3 are likely to improve student achievement. Specifically in Principle 2, the limited detail on indicators and calculation methods of the school accountability system and in Principle 3, the plan to develop the guidelines did not provide sufficient detail or timelines to assure the meeting of the 2012-2013 adoption deadline.</p>
<i>Strengths</i>	<p>Since the 2010 adoption of CCSS, CORE has been supporting the partner districts in transitioning to the CCSS above and beyond what the State has done (P. 27). CORE describes a process to phase in the CCSS and provide guidance and professional development to teachers (P. 30). However, there is not evidence of the content developed to deliver this information to teachers. CORE is planning a phased in application and guidance to allow educators to begin providing instruction of the CCSS prior to 2013-2014. CORE intends to use outside experts to develop more specific guidance for providing CCSS-aligned instruction for English Learners and students with disabilities.</p> <p>Specific strengths for each of the principles can be found in those respective sections.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>Because many of the details of CORE's proposed accountability system are yet to be developed, it is unclear as to whether the accountability system is likely to improve student achievement or close achievement gaps. CORE's accountability system will not consider all students and may not consider all subgroups, but, rather,</p>

Overall Evaluation	Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA's approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?
Response Component	Panel Response
	<p>only the highest grade in each of its schools. The request indicates that districts will be required to meet certain requirements related to accountability, but has no process to ensure that its districts meet the requirements. CORE proposes to identify priority and focus schools each year, but has not addressed whether its districts have the capacity to provide support to an increasing number of schools.</p> <p>CORE plans to have the educator evaluation systems implemented at the end of the 2015-2016 school year. However, CORE has yet to adopt guidelines and issue guidance to districts for the adoption of educator evaluation systems. Furthermore, the districts will have to adopt their own guidelines and develop the educator evaluation systems, which are also subject to local approval requirements and collective bargaining agreements. Given that CORE's flexibility request requires district guidelines be adopted by the end of the 2012-2013 school year, it is unlikely that its districts can adopt guidelines on that timeline.</p>
<i>Technical Assistance Suggestions</i>	<p>See specific suggestions in each section. However, some additional technical assistance suggestions are included below.</p> <p>While CORE has an implementation plan, peers would like CORE to ensure that it will adequately address, equitably across all districts, the resources and supports that are necessary for all teachers, including teachers of English Learners and students with disabilities.</p> <p>Specifically, related to Principle 2, the plan needs additional development to be coherent and comprehensive in supporting continuous improvement.</p> <p>The foundation for interventions for all students in Priority, Focus, and Other Title I schools based on cross-district partnerships needs further development to ensure a rigorous, comprehensive, consistent process for identifying interventions across districts and schools. CORE should provide a description of the process to ensure that cross-district teams are thoroughly trained, appropriately matched, and have the skills and expertise.</p>

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