STATE PLAN
PEER REVIEW CRITERIA
Peer Review Notes Template

STATE: North Carolina

U.S. Department of Education

Background

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

Role of the Peer Reviewers

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

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

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

How to Use This Document

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

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

Instructions

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

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

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

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

A.1: Challenging State Academic Standards and Assessments

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

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

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

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

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

	Peer Response
Peer Analysis	The SEA describes current end-of-grade math assessments that accompany advanced mathematics courses for middle school with provisions for teachers to identify any areas that need additional instruction so all students can participate in advanced mathematics classes in middle school. The state will be asking for a waiver to extend option to students in grade 7 (in addition to grade 8) who take NC Math 1 prior to high school. P.15-16
Strengths	NCDPI has developed a system for all students to have the opportunity to take advanced mathematics courses and assessments.

SEA recognizes that some 7th grade students will be ready for advanced mathematics courses. |
| *Weaknesses* | The State plan would be strengthened by offering more detail on how the strategies described directly target advanced mathematics coursework and how they will help all students, including any evidence on their use to date, if |

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

	available.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

A.3.i: Definition

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

	Peer Response
Peer Analysis	NCDPI defines languages other than English spoken to a significant extent in the participating student population as any language other than English that accounts for two percent or more of the overall tested student population. NCDPI has identified Spanish as meeting the definition of significant prevalence in the participating student population. NCDPI presents data to illustrate the occurrence of Spanish and other languages that are spoken by students who are in the participating population and by those students identified as English learners.
Strengths	The SEA has examined the prevalence of Spanish in selected LEAs (but does not give the results). As part of the public consultation process, the English Learner Advisory Council identified language prevalence within specific population groups, e.g., migratory students. The State provides a clear definition and has reviewed data for both the overall K-12 population and ELs to assess what languages other than English are spoken. State has also reviewed data by district.
Weaknesses	NCDPI could indicate the grade bands in those districts where there were a concentrated number of students for whom English is not their native language to inform a decision about which assessments may be needed.

Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	Per state statute requiring English only instruction, NCDPI has no assessments for ELL students in their native languages for English/Language Arts/reading and for mathematics.
Strengths	
Weaknesses	ELLs may not be able to demonstrate proficiency on state assessments not provided in native languages.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.3.iii: Assessments not Available and Needed

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

	Peer Response
Peer Analysis	North Carolina has a state statute that requires all instruction to be in English; therefore, the state has no plans to develop a test in any language other than English.
Strengths	
Weaknesses	It is unclear that use of English-only assessments provides an accurate representation of the achievement of students who don't have proficiency in English.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))

If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.3.iv: Efforts to Develop Assessments

➢ Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?

➢ Does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State's plan and timeline for developing such assessments?

➢ Does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
  - o 1) gather meaningful input on the need for assessments in languages other than English;
  - o 2) collect and respond to public comment; and
  - o 3) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?

➢ If applicable, does the SEA's description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (*e.g.*, legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	Peer Response
Peer Analysis	State law requires instruction in English. The state conducts required assessments in English and has no plans to develop assessments in languages other than English.
Strengths	Even though NC state law does not allow instruction in languages other than English, SEA has gathered input on the potential need for assessments in languages other than English. The EL Advisory Council determined that the optimal focus for their efforts is support for English learners rather than development of specialized assessments. P.18-19
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

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

	Peer Response
Peer Analysis	The State plan meets the requirement by listing the following subgroups: Black, Hispanic, White, Asian, American Indian, and two or more races.
Strengths	
Weaknesses	The State plan could provide its definitions of these subgroups for greater clarity and completeness.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	NCDPI intends to report the performance of students who are academically gifted and talented. However, NCDPI also indicated that this subgroup would not be used for accountability.
Strengths	The SEA's focus on the gifted/talented subgroup carries throughout the plan, e.g. there is a focus on supporting gifted/talented students in transition discussion.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.i.c: Previously Identified English Learners

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

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

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

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

	Peer Response
Peer Analysis	This peer review criterion applies only if a State selects the third option in item A. The state has selected option 2 (applying the exception under ESEA section 1111(b)(3)(A)(ii).
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (#peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	NCDPI has chosen an N-size of 30 for accountability. This minimum number of students is the same number for all students and for each subgroup of students for accountability purposes.
Strengths	
Weaknesses	

Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s))
	☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Is the selected minimum number of students statistically sound?[2]

	Peer Response
Peer Analysis	Two peers acknowledge that 30 is a statistically sound minimum N size.
	Two peers were concerned that the N size of 30 will lead to under-identification of students and schools in need of support. For example, NCDPI states that "an N-size for the Hispanic subgroup in grades 3-8 will include 59 percent of the schools and these schools have 90 percent of North Carolina's Hispanic student population." The purpose of ESSA accountability plans is to identify schools for identification and support services, yet many schools will not be identified using this N-size. In contrast, with the lower N-size of 10, 85 percent of schools would be included for identification and support. This disparity in numbers of schools identified between an N-size of 30 and an N-size of 10 can also be seen in other subgroups.
Strengths	The SEA provides information about the results of using N sizes of 10, 15, 20, 25, 30, 35, and 40 in terms of number/percent of schools with subgroups that would be included at each N-size.
Weaknesses	The large N-size (30) is a barrier to identifying schools that may benefit from intervention and support and additional funding.
Did the SEA meet all requirements?	☒ Yes (2 peer reviewer(s))
	☒ No (2 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must	The State must provide additional justification for the determination of minimum N size, including evidence that the selected minimum N size will not inadvertently exclude identification and support of students and schools in need.

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

provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	SEA analyzed different options and gathered input from stakeholders and then made a final choice of N-size. SEA describes stakeholder groups who weighed in on minimum N-size, acknowledging that a few advocacy groups wanted lower N-size though almost all supported 30 as minimum. P.24
Strengths	
Weaknesses	SEA states that the N-size of 30 will positively impact the identification of struggling schools (p.20) but provides no convincing supportive analysis. While the state plan describes how it determined the minimum N-size, it does not provide reasons for not choosing smaller N-sizes (e.g., 20).
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➤ Does the SEA describe how it ensures that the minimum number of students will protect the privacy of individual students?[3]

	Peer Response
Peer Analysis	The SEA identifies the internal agency group responsible for safeguarding student privacy but makes no mention of the processes involved (e.g., suppression, ranges, etc.).
Strengths	
Weaknesses	NCDPI has not described specific strategies for protection of PII although the plan does discuss strategies with respect to reporting. While the minimum N-size of 30 may protect against most inadvertent identification, adjacent cells may allow for identification. For example, if the

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[3] See footnote 5 above for further guidance.

	total number of students is 50 and 49 have one subgroup identification, and the second is not suppressed, identification is possible.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The State must describe specific processes used by its data management group to protect student identity.

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

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

	Peer Response
Peer Analysis	NCDPI will use a minimum N-size of 10 for reporting and will use mitigation strategies and suppression strategies for protection of PII.
Strengths	A Data Management group reviews/monitors policies and ensures privacy protections. The SEA is planning to use smaller N for reporting to provide more detailed information for the public regarding student achievement. The State plan incorporates best practices in top coding and suppression to protect student information. Suppression of percentages provides greater protection of student identities. The State also reviewed historical data to ensure that this N-size is sound.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

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

	Peer Response
Peer Analysis	SEA has made a thorough presentation of long-term goals, current baseline, trajectory for all subgroups based on analysis over a 10 year period. Timelines are projected for all subgroups and expected increases in proficiency are customized to each subgroup. P.25-27
	The SEA has set ten-year achievement goals with two purposes: improving overall performance and closing achievement gaps. Overall targets increase by 2 percentage points per year, with more rigorous goals set for underperforming subgroups. Each school and subgroup within each school will have a unique growth target established to ensure that overall performance goals can be met. (pg 27)
Strengths	The SEA presents information about existing gaps for particular subgroups. SEA will customize expected increases by school overall and for each subgroup.
	The SEA acknowledges the importance of incentivizing all schools to make progress, including those who are already high performing.
Weaknesses	State plan requires significant improvement (~20 percent more students to become proficient), but the overall percentages of students expected to proficient after 10 years based on the long-term goal is ~65-75%. While this seems realistic and informed by data, it means that about ¼ of the student population will still be performing below standards.
	It does not appear that goals for academic achievement will yield results that reflect equity in expectations for each of the subgroups. The extent of gaps is substantial and the current proficiency levels overall are low (typically fewer than half of students are proficient in ELA and math at any grade level). An expanded explanation of the tool that was used to determine these goals for subgroups would be helpful.
	Given the commitment to personalization and competency based education outlined in the introduction, it would be helpful to have more information about the degree to which the SEA has determined that the approach they have outlined is likely to yield acceleration of long term goals.

	The 10-year goal for reading in grades 3-8 is lower than that of all other goals. (pg 27). Given the critical role of reading, and its position of being a primary driver of other assessment scores, the state may struggle to realize higher targets in other areas. The SEA may wish to consider setting more ambitious targets for reading in grades 3-8.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.iii.a.2: Measurements of interim progress
➢ Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
➢ Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

	Peer Response
Peer Analysis	The SEA provides interim targets in ELA and math for meeting long-term targets (Appendix A) for all students and subgroups.
Strengths	
Weaknesses	The plan needs more detailed explanation of how the SEA derived the values for the measurements of interim progress. If the SEA meets all targets, significant subgroup gaps will still exist. The SEA should consider whether these targets yield adequate equity for students.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	SEA will be reducing gaps over 10-year period but significant gaps will remain given low proficiency baseline rates of some subgroups. P.27-28

	Appendix A
Strengths	
Weaknesses	Even if progress targets are achieved, significant gaps will remain. Appendix A indicates that even if all targets are met, there will be more than a 40-percentage point gap between highest and lowest performing groups in high school reading, for example (pg. 149). English learners will remain the lowest performing group with proficiency under 50%.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	NCDPI needs to revise long term goals and interim progress measures to reduce significant gaps between subgroups.

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

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

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

	Peer Response
Peer Analysis	The State identifies a long-term goal of 95 percent for 4-year adjusted cohort graduation rate for all students and subgroups. The Appendix provides baseline data for all students and subgroups and a 10-year timeline (targets reached by 2027).
Strengths	The SEA sets individualized expectations for each school with the philosophy of incentivizing all schools, including schools that already meet the graduation rate goal.
Weaknesses	While the goals to close the graduation gap are ambitious, this information is inconsistent with the proficiencies presented in the long term goals. It doesn't seem possible that 95% of students graduate where the expectations for proficiency hover at 60% or lower for three-fourths of the subgroups. The State plan could clarify why the 95% target was selected.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet	

this requirement	

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

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

	Peer Response
Peer Analysis	SEA has no plan to use an extended cohort rate. P. 29
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The State identifies measures of interim progress toward long-term goals for the 4-year adjusted cohort graduation rates for all students (including subgroups), meeting the requirement.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information	

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

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

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

	Peer Response
Peer Analysis	The SEA illustrates expected improvements for all subgroups to meet the 95% graduation goal. P.29-30. The SEA acknowledges that underperforming groups will need to meet more aggressive targets to close existing gaps.
Strengths	
Weaknesses	It isn't clear how 95% of students can achieve graduation rates when the proficiency rates are so low for some subgroups. The SEA acknowledges the challenges present for English learners (the subgroup with the lowest current graduation rate) and will re-evaluate membership for that group to include four-year exited English learners. While changing membership of the group to include exited ELs may improve the overall picture of the data, it may not dramatically improve outcomes for EL students without more targeted language support.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

	Peer Response
Peer Analysis	NCDPI provides the long-term goal for increases in the percentage of ELLs making progress in achieving English language proficiency as measured by the statewide English language assessment. That goal is that 50% of ELs will make progress toward exit status or will be exiting EL status during the 10-year time span. Progress is determined as an ever-increasing score on the ACCESS assessment every year over what could be as long as the 5-year maximum time a student has to exit the program, starting at the point of identification as ELL. A value table shows the progression of a student's overall score on the ACCESS assessment based on the number of years predicted for the student to make continuous progress toward the goal of achieving exit.
Strengths	NCDPI has developed a good system of tracking students' progress as they gain proficiency over the five-year period. The long-term goal is ambitious and can be tracked through the data yielded by the ACCESS assessment. Clear presentation of how progress is calculated. The State plan provides helpful examples and explanation. The State has thoughtfully considered exit times and expected progress given initial English language proficiency levels. State will set improvement goals even for schools already meeting progress expectations.
Weaknesses	While the expectations of improvements in the number of students making progress may seem ambitious, they are necessarily so because current performance of EL students is so low—only 18% make progress even though determination of progress is keyed to entering proficiency level. This is consistent with the State's long-term goals in reading and mathematics. Under those goals, expectations over 10 years still result in half of English learners not attaining proficiency. We note that the cut score of 4.8 is inconsistent with the cut score of 5.0 used to determine need for native language accommodations. P. 17
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	State plan identifies and describes measurements of interim progress for increases in percentage of ELs making progress.

Strengths	
Weaknesses	At the end of the 10-year period, only 50% of EL students are expected to make progress from year to year.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

A.4.iv.a: Academic Achievement

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

	Peer Response
Peer Analysis	Peers reviewed both the plan and the provisions of the state law referenced on p. 40 of the plan. The SEA describes the Academic Achievement Indicator (in the plan) to be applied to all schools and LEAs. SEA describes the academic achievement indicator for elementary/middle as including English/Language Arts (ELA) and math scores using grade level proficiency (level 3 and above) as the expectation. The SEA plans to disaggregate for all subgroups. The plan suggests that student growth will be measured for high schools on end-of-grade tests and end-of-course tests in ELA and in mathematics. P.34

	While not included in the plan itself, the referenced State law provides details on how the indicator is calculated, and includes a statement of consistency in the process of making calculations for all schools. The performance index that combines all indicators is based on levels A-F is described in state law. The Academic Achievement Indicator appears to have the potential to align very well with the state's long-term goals and the MIPs. NCDPI states that the state requires the participation of all students who are in a grade or course that requires an end-of-course assessment.
Strengths	
Weaknesses	The State's plan would be clearer if all information about indicators, how they were calculated and weighted, and the A-F accountability system that was included in state law had been described in the body of the plan. More detail on how the indicators are calculated (including the growth measure) would strengthen the plan. Illustrative examples would help show how the calculations in law actually work. Expectation for inclusion is a minimum of 95% participation but no information about implications for less than 95% rate are presented here. p. 32-35
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)). ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	NOTE OF CLARIFICATION: NCDPI should include information in the state plan on the relevant state law as a link in the state plan or by appending the law to the state plan. The plan alone as presented to the peers would not have met the requirements because information about indicators, how they were calculated and weighted, and the A-F accountability system was not included in the plan

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

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

➢ Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
➢ Does the SEA describe, if applicable, how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?
➢ If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?

- ➤ If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- ➤ If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- ➤ Can the indicator be disaggregated for each subgroup of students?

	Peer Response
Peer Analysis	NCDPI has chosen to utilize the End-of-Grade tests in science that are administered only in grade 5 and 8. Results are reported by subject as a measurement of grade level proficiency (defined as achievement of Level 3 and above on the assessment). This indicator will be applied to all schools with those two grades and can be disaggregated for all subgroups. P.35
Strengths	
Weaknesses	The indicator only encompasses two grades and therefore has limited applicability in terms of meaningfully differentiating schools.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.iv.c: Graduation Rate

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

	Peer Response
Peer Analysis	NCDPI applies the 4-year ACGR calculated as defined in Section 8101[20

	U.S.C.7801] in the ESSA. The calculation is consistent for all high schools in the state. The indicator is valid and reliable and aligns with North Carolina's long-term goals. NCDPI does not award an alternate diploma for students with the most significant cognitive disabilities, but students with the most significant cognitive disabilities are assessed with an alternate assessment. Students with the most significant cognitive disabilities are reported in either the 4 or 5-year rate but for purposes of the ESSA accountability, these students will also be included in the 4-year ACGR.
Strengths	SEA audits a random sample of high school data each year to ensure accurate application of rules.
Weaknesses	While NCDPI reports a 5-year graduation rate, that rate will not be included in the accountability indicator. NCDPI did not specifically state how they would include those students who graduate in 5 years in the Graduation Rate Indicator, but since those students are part of the 9th grade cohort, it is assumed that they will be combined into the 4-year rate.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

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

	Peer Response
Peer Analysis	SEA uses progress indicator based on ACCESS proficiency target levels of growth aligned with long term goals; applied to grades 3-8 and grade 10. Definition of EL proficiency is based on scores on ACCESS. p.36-37 State plan describes the indicator as the percent of students increasing their proficiency according to a value table based on ACCESS scores, which is consistent across all LEAs. The indicator is aligned with the state's timeline for achieving English language proficiency.

Strengths	NCDPI has designed a strong model for an indicator that will yield critical and actionable information to the SEA and LEAs. The plan provides a clear explanation of determination of progress. Later sections of plan explain involvement of stakeholders over 10-year period in setting expectations for English learners. State provides a clear definition of progress and English language proficiency, including helpful examples and formulas.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.iv.e: School Quality or Student Success Indicator(s)

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

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

	Peer Response
Peer Analysis	At least one school quality indicator meets all the requirements for each grade span. The School Quality measure for elementary and middle is a value-added growth model calculated through the EVAAS system which allows for differentiation across schools and can be disaggregated by subgroups. For high school, indicators are biology end-of-course proficiency score, ACT score of 17, silver level or higher on ACT Work Keys, and/or passing the Math 3 course.

	The following three indicators at the high school level meet the requirements: biology, ACT, and ACT Work Keys. However, the Math 3 course indicator does not meet the criteria because of potential lack of comparability in student entry requirements for advanced math courses and the variability in teacher-assigned course grades.
Strengths	
Weaknesses	It would be helpful for the plan to provide more information about which students take ACT Work Keys because the weighting of the indicator within the overall A-F system is influenced by the number of students. Course grades in math courses are not likely to be comparable across schools in the state, and are therefore not valid or reliable. The State's use of course grades compromises the consistency of application of this indicator.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) for elementary/middle school indicator; and high school indicators for biology, ACT, and ACT Work Keys ☒ No (4 peer reviewer(s)) for high school Math 3 indicator
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	For the high school Math 3 indicator: State should describe how it will ensure comparability of access to the course and passing grades across the state.

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

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

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

	Peer Response
Peer Analysis	The plan does not provide enough information about how the indicators are calculated and weighted to make a determination; however, the State law referenced on p.38 describes how points are assigned to develop the A-F designations within the performance index, including all indicators and applying to all students and subgroups. In the plan, NCDPI provides only a brief general description of its system of annual meaningful differentiation of all public schools in the state.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))

If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	NOTE OF CLARIFICATION: NCDPI should include information in the state plan on the relevant state law as a link in the state plan or by appending the law to the state plan. The plan alone as presented to the peers would not have met the requirements.

A.4.v.b: Weighting of Indicators

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

	Peer Response
Peer Analysis	The plan did not include information about the weights of indicators but reviewers used information about indicator weights found in the state law in making a determination.

Academic achievement, other academic, graduation rate, and progress in achieving English language proficiency indicators receive substantial weight individually and for elementary and middle it is clear that they do have greater weight than school quality in the aggregate.

A variety of high school indicators was listed but reviewers could not ascertain from the plan or law the effective weights.

The SEA uses a composite approach to the weighting of the achievement elements based on the number of students measured by an achievement element and proportionally adjusts the weight to account for the absence of a school achievement element. This methodology combined with an N-size as large as 30 could lead to the failure to appropriately and meaningfully designate a school as in need of Comprehensive Support, and particularly in need of Targeted Support.

The SEA does not adequately describe the process for dealing with minimum N-sizes, indicating only that the indicator's weight will be "naturally absorbed into the model." Pg. 41. |
| *Strengths* | |
| *Weaknesses* | The method of calculation of indicator weights (N-size) may lead to inappropriate or incorrect designations of schools given the proposed N-size.

NCDPI does not include all the appropriate elements into weighting factors for high schools. |

	Examples of how the model will change when indicators are not present would strengthen the clarity of the plan.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must provide examples of how: 1) weights operate at the high school level to ensure that academic achievement, other academic, graduation rate, and progress in English learner progress indicators carry substantial weight and 2) in the aggregate at the high school, academic indicators weigh more than school quality indicators. NOTE OF CLARIFICATION: NCDPI should include information in the state plan on the relevant state law as a link in the state plan or by appending the law to the state plan. In this case, the plan and the law together do provide enough information for peers to make a determination about not meeting the requirements.

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

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

➢ Does the SEA's description of a different methodology indicate the type(s) of schools to which it applies?

	Peer Response
Peer Analysis	NCDPI reports that the state has 36 K-2 schools and plans to use designations for each school based on the designation of the elementary school that enrolls the largest percentage of its students. The state will also use an alternative accountability model for schools serving special populations, offering four options to choose from. Option B allows schools to return data back to base schools and receive no designation.
Strengths	
Weaknesses	NCDPI provides insufficient information about the options that alternative schools are allowed (e.g. it is not clear what components are used to assess progress in Option C, the alternative progress model). Because alternative schools have the option of receiving no designation under one of the four options in the state plan, a school cannot receive a CSI/TSI designation as required. P. 41. There is no information about how many alternative schools would be subject to these options.
Did the SEA meet all requirements?	☐Yes (peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must	The peer reviewers believe the requirement was met for K-2 schools. The following comment applies to the alternative school accountability model: The SEA must describe how all schools all using the alternative school

provide to fully meet this requirement	accountability model can receive a designation of CSI or TSI.

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

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

➢ Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement including, if applicable, how it averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?

➢ Does the SEA's methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?

➢ Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department's guidance)?

	Peer Response
Peer Analysis	The State will identify the lowest 5 percent of Title I schools based on overall composite score from its A-F system. Selecting the bottom 5% based on that score seems straightforward and will appropriately identify schools for comprehensive support and improvement. State will identify schools for the 2018-19 school year using 2017-18 data.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Does the SEA describe its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement, including: 1) a description of whether the SEA uses one or more extended-year adjusted cohort graduation rates in addition to the four-year adjusted cohort graduation rate and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?

➢ Does the SEA's methodology result in the identification of all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement?

➢ Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department's guidance)?

	Peer Response
Peer Analysis	The State will identify any high school failing to graduate one-third or more students (based on 4-year graduation rate) for comprehensive support and

	improvement for the 2018-19 school year (using 17-18 data). The State will average data for very small schools and clearly describes its method to do so.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The SEA will use the exit criteria for a subgroup: either achieving a "met or exceeded" growth status in a 3-year growth score or on track to meet the 10 year proficiency goal. The initial application of this method is in 2024-25, that is, 3 years after 2021-2022 (Attachment 6).
Strengths	
Weaknesses	NCDPI places the identification of these schools following the 2023-2024 school year based on their initial identification as a school needing Additional Targeted Support in the 2021-2022 school year instead of in the 2018-2019 school year.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.vi.d: Frequency of Identification

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

	Peer Response
Peer Analysis	NCDPI reports that it will identify each type of school for comprehensive support and improvement every three years after the first year of identification, the 2018-2019 school year. Their rationale for the time interval meets the requirement.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	SEA will annually identify any school with a consistently underperforming subgroup (typically defined as 3 years of receiving the F designation). Exit is annual if subgroup is higher than F. p.44
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?

➢ Does the SEA's methodology result in identification of such schools?

➢ Does the SEA include the year in which the State will first identify such schools (*i.e.*, does the timeline comply with the Department's guidance)?

➢ Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	Peer Response
Peer Analysis	State will identify schools for additional targeted support every 3 years (beginning in 2021-22 which is not consistent with ESSA guidelines) from among all schools with consistently underperforming subgroups. The state clearly describes its method, which looks for schools in which any subgroup has 3 years of scores lower than the highest comprehensive support schools. There is also an optional criterion related to student growth.
Strengths	
Weaknesses	The SEA is not proposing to annually identify schools, but instead do so every 3 years, beginning in 2020. The SEA intends to begin a "watch list" in the 2017-18 school year. The SEA indicates that some subgroup data will not be available until 2019-2020.
Did the SEA meet all requirements?	☐ Yes (peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The state's plan must show how it will identify schools beginning in the 2018-19 school year.

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

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

	Peer Response
Peer Analysis	NCDPI reports that they have no additional statewide categories of schools.
Strengths	
Weaknesses	
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☐ No (# peer reviewer(s))

If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

A.4.vii: Annual Measure of Achievement (ESEA section 1111(c)(4)(E)(iii))

➢ Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?

➢ If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (*e.g.*, 92 percent participation rate vs. 70 percent participation)?

	Peer Response
Peer Analysis	The SEA describes the method for determining adequacy of participation and how it factors into the accountability system the requirement of 95 percent participation of all students and 95 percent of all students in each subgroup in statewide mathematics and reading/language arts assessments.
Strengths	
Weaknesses	The penalty for failing to meet participation rates varies based on the extent of non-participation. The penalty may not be adequate to incentivize participation.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

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

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

	Peer Response
Peer Analysis	SEA applies "qualifying criteria" as exit criteria in each case after a specified number of years; 4 years is the maximum for CSI. Exit criteria are clear that a school no longer meets the conditions under which the school was originally identified. p. 47 Appendix 6 The SEA clearly articulates how schools will exit improvement status—by no longer residing in the bottom 5% of Title 1 schools, improving graduation rates over the 67% threshold, or meeting and exceeding expected growth targets.
Strengths	
Weaknesses	State plan could address situations where schools bounce between the bottom 5 percent and upper 95% after exiting. There are no processes to ensure continued progress once a school has met the exit criteria.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	Schools which were identified for targeted support will exit when they meet or exceed the growth score, based on 3 years of data. This approach meets the statutory requirement.
Strengths	Looking at subgroup growth status over a 3-year period should provide a reliable reading of performance improvements.
Weaknesses	Because the criteria are complex, clarity in explanations to school leadership

	and faculty will be critical.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	CSI schools in North Carolina that fail to exit School Improvement will be required to implement more rigorous interventions which may include the adoption of a specific turnaround model. NCDPI provides an example of a specific turnaround model created by North Carolina statute. One model, the Innovative School District has essentially two types of schools--either a charter school managed by a charter Management Organization or a school that is managed by an Education Management organization. The schools have a strong focus on mission and goals to turn the school around and improve academic outcomes. The initial contracts are for 5 years with a three-year extension if the school is showing progress. After that time, the plan is to turn the school back over to the original school district unless an arrangement can be made by the established management group and the district that will assure that the school will continue to be operated according to a model that assures continued improvement. The second type of school is an Innovative School, which is also supervised by the Innovative School District. This is a partnership between the LEA and the ISD that permits groups of low-performing schools in the district to have more flexibility, that is, similar to a charter school. The district must create a separate I Zone office and section of the district that is operated by separate leadership and staff with the single focus of improving the schools in their I Zone. The school is given a similar 5-year contract but if there is no improvement, the school will be converted to a charter school that is operated by a CMO or EMO.
Strengths	NCDPI has described a plan that includes examples of specific interventions that change school level operations, staffing and overall management of the school.
Weaknesses	Two reviewers believe there is insufficient detail on what the range of more rigorous interventions will constitute, i.e. more than describing possible

	options. No information is given about the effectiveness of the two possible options described.
Did the SEA meet all requirements?	☒ Yes (2 peer reviewer(s)) ☒ No (2 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must clarify the rigor of the possible interventions and how those interventions will be determined for each school.

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

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

	Peer Response
Peer Analysis	The SEA describes that it will determine annually which schools receive the NC Comprehensive Needs Assessment and Unpacking (pg. 51) but does not specify how that process determines resource allocation. Additional language in this section is focused on professional development but does not link that process to resource allocation in those schools identified for comprehensive or targeted support.
Strengths	
Weaknesses	SEA did not provide enough detail about how the Comprehensive Needs Assessment and Unpacking tool is used to address resource allocation.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must explain how its needs assessment specifically includes review of resource allocations. The SEA must also clarify these reviews will be conducted in LEAs serving significant number/percent of schools identified for support.

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

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

	Peer Response
Peer Analysis	The SEA provides a structure for tiered support for schools needing improvement, including coaching, professional development, continuous

improvement, curriculum support and participation in demonstration programs. But the substance of the supports is not specified nor is it clear how that there is evidence they will contribute to improving student outcomes.

Schools are required to use NC Star to monitor/report improvement activities, including serving as the reporting mechanism for the monitoring findings of implementation of interventions. p.51-55

The level of technical assistance will depend upon outcomes within each school, their particular needs and the capacity of the district personnel (after a thorough evaluation of district needs) to affect substantial improvement.

The SEA recognizes that support for district capacity is needed in the LEAs with significant numbers of identified schools; this must be a partnership process with LEAs; and support must be customized according to district/school need.

Strengths	
Weaknesses	There is no evidence for how the proposed strategies will produce outcomes. The comprehensive nature of the system means that if the number of identified schools substantially increases, SEA resources may become strained over time.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must describe evidence-based interventions and link them directly to needs of schools and strategies for sustained improvement. The SEA must show how its proposed technical assistance is likely to improve student outcomes, especially with more detail about the substance especially in relation to English learners and students with disabilities.

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

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

	Peer Response
Peer Analysis	SEA will require LEAs with significant numbers of schools consistently identified for comprehensive support to use planning tools, including a district version of NC Star. The planning tool becomes the basis for SEA to offer coaching and support to those LEAs. Those LEAs will also receive extra support for implementing statewide initiatives. P.56
Strengths	NCDPI describes additional supports and services that it will provide to struggling schools in the state that will provide an enhancement of the technical assistance services already being provided.

Weaknesses	Limited detail is provided about the substance of the extra support.
	Not clear how use of the planning tools will trigger a higher level of support.
	Not clear how the expectations are related to the more rigorous interventions described previously.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Does the SEA describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

➢ Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

➢ Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?[4]

	Peer Response
Peer Analysis	NCDPI presents an extensive study of Equity of Access to Educators. However, they used the designation of Title I vs non-Title I schools to demonstrate poverty and minority distributions. SEA presents an analysis of the extent to which "proxies" for low income and minority children are served by ineffective, out-of-field and inexperienced teachers by using comparisons between Title I and non-Title schools with the data available. SEA describes various types of public reporting but details of specific reporting requirements on progress with equity in teachers assigned to low income and minority students are not clear. P. 57-68
Strengths	

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

Weaknesses	An evaluation of each school in the state that disaggregated for poverty and minority students would be useful in future studies. State acknowledges that out-of-field measure is not completely accurate given a lack of data matching teachers/licenses to specific courses taught.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The State plan must describe the extent to which low-income and minority children are served at disproportionate rates by ineffective, out-of-field or inexperienced teachers rather than just students in Title I schools compared to those in non-Title I schools.

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

➢ Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
➢ Does the SEA's description include how it will support LEAs to reduce incidences of bullying and harassment?
➢ Does the SEA's description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?
➢ Does the SEA's description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

	Peer Response
Peer Analysis	SEA has identified a variety of initiatives/programs that support positive school conditions for student learning, using a holistic and integrated approach that encourages community connections. The State has specific legislation related to bullying and harassment. SEA staff require local plans and provide training to LEAs as well as analysis of related data. The SEA has consultants who provide support for nonviolent crisis intervention to reduce the use of aversive behavioral interventions. P. 68-73 The NCDPI has convened the Disparities in Discipline Task Force that is an interagency effort in conjunction with the House of Representatives. NCDPI reports that the purpose of the task force is "to study ineffective and effective disciplinary policies, practices and data in schools across the state and develop recommendations for best practices state wide". The task force is informed through data collected by NCDPI. In reducing aversive behavioral interventions, NCDPI provides support to LEAs through the assistance of consultants who train educators in "Nonviolent Crisis Intervention". This is a multipronged approach that can be used in the classroom and school environment that assist educators in using verbal and nonverbal approaches to assisting students who must be placed in state approved restraints. The majority of these practices appear to have been in place for the last several years; (pg. 70) however, the SEA does not provide data indicating whether or

	not any of these practices have been effective in reducing any of these issues.
Strengths	NCDPI has described a multipronged approach to deal with reducing incidences of bullying and harassment, reducing the need for the overuse of discipline practices that remove students from the classroom and reducing the use of aversive behavioral interventions that compromise student health and safety. An integrated set of strategies is presented, including the use of a statewide Disparities in Discipline Task Force that is an interagency collaboration. SEA provides statewide data collection system that includes behavioral and discipline data to use a data-driven decision-making approach. The state legislature provides resources for character education resources and professional development.
Weaknesses	The State could clarify how this initiative will particularly support schools under Title I Part A.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

➢ Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?

➢ Does the SEA's description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

	Peer Response
Peer Analysis	SEA is modifying the continuous improvement plan required of all LEAs annually to include required descriptions of transition strategies. Plans are reviewed by SEAs. State law requires LEAs to adopt transition policies for elementary to middle school and between middle and high school for at risk students and has also addressed the transition between early learning and the public school system. P.73-75. No details were given regarding this effort. For example, the plan does not address specific strategies (e.g., monitoring course completion in 9th grade). There is newly developed and extensive work in the transition from early childhood programs to kindergarten that are a result of collaboration between the NCDPI, LEAs, preschool providers in private settings and the Department of Health and Human Services.

| | NCDPI also addressed those transitions for students who are intellectually and academically gifted.

With the 2017 school year NC will initiate work with the Exceptional Children Division on improving postsecondary outcomes for students.

The plan provides a description of how DHHS and the SEA are working together to align progressions from Pre-K to the school system as well as providing specific planning guidance for a local early learning transition plan. There is an expectation that local NC Pre-K committees will be responsible for transition plans; implementation of a pilot to improve transitions followed by a three year scale up plan to engage Pre-K committees statewide. SEA communicates understanding that transition alignment covers Pre-K through grade 3. Recognizing that postsecondary outcomes for special needs students depend on alignment of skills across the continuum, the SEA is collaborating with the Zarrow Center to align self-advocacy and self-awareness skills with college/career readiness standards. SEA plans to develop a tool to look at independent living, employment, career skills across the continuum with recommended activities. |
|---|---|
| *Strengths* | NCDPI employs cross agency collaboration, interagency work, improvements to legislation and further development of data collection to provide better transition strategies on all grade spans for Title I students.

SEA demonstrates an understanding that there are many types of transitions that require special attention.

Expectations are set that all LEAs attend to the transition of gifted students at key points in time to ensure that needs are met and drop-outs limited. |
| *Weaknesses* | The SEA is focused primarily on Kindergarten readiness and college and career readiness skill in its description. The SEA does not address other factors related to transition challenges such as chronic absenteeism, and/or family support issues.

The SEA does not specifically address processes designed to provide effective transitions from elementary to middle and middle to high school. For example, there was scant information regarding credit accumulation in high school, credit recovery, 9th grade data review for at risk students and dropout prevention strategies in this section.

The State plan in this area would be stronger if it offered examples of the types of plans LEAs develop or the feedback and support it provides to LEAs. |
| *Did the SEA meet all requirements?* | ☒ Yes (3 peer reviewer(s))

☒ No (1 peer reviewer(s)) |
| *If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement* | The SEA must describe in greater detail supports for LEAs whose plans indicate a need to support students in making transitions in middle school. |

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

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

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

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

	Peer Response
Peer Analysis	NCDPI has established and implemented since 2009 their entrance and exit procedures that all LEAs must employ for students identified as ELL. Since that date, there has been ongoing work including extensive consultation with stakeholders from LEAs, the NCDPI, agency partners, community partners and advocacy organizations. NCDPI gave a detailed description of the entrance procedures from the point of identification with the Home Language Survey within the first 30 days that a student enrolls in a NC school and the administration of the WIDA English Language proficiency screener to the point of evaluating the student using assessments aligned with state requirements.
Strengths	NCDPI utilized extensive consultation since 2009 with stakeholders, agency partners, advocacy groups, parents and educators throughout the state. State has detailed and clear entry and exit procedures and the plan communicates them well, including through a flowchart.
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

➢ Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	Peer Response
Peer Analysis	NCDPI reports that it uses a variety of strategies to support the interim progress of EL students in attaining English language proficiency by increasing capacity at the district and school level to implement research based strategies. For example, the Language Instructional Education Program is provided to all schools serving EL students. It provides a template with a full array of possible services for the EL students. A primary support is the EL Support Team, a cadre of consultants available to districts who can provide research-based/theory-based approaches for best practices. P. 124-128
Strengths	NCDPI has employed multiple strategies using agency partners, educators, former employees and retired ELL educators as well as federal agencies in supporting students to develop English Language proficiency and continuing to support those students after exit from the program.
Weaknesses	Given that EL students represent some of the lowest performing students in the state, as evidenced in earlier sections related to achievement targets and the SEA has been using its current strategies for some time, the SEA should provide some evidence of the effectiveness of its strategies.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	The state plan describes a consolidated compliance review process which is used to monitor progress of eligible entities but does not specify the steps that it will take to provide additional assistance if strategies are not effective. This is particularly important in light of the low performance of EL subgroup.
Strengths	
Weaknesses	Limited information is provided about the steps that will be taken to assist eligible entities when strategies are not effective.
Did the SEA meet	☐ Yes (# peer reviewer(s))

all requirements?	☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	The SEA must describe steps it will take to help LEAs if their strategies are not effective and describe how the SEA will identify which Title III programs and strategies are not effective.