

# ESEA Flexibility

## Request Review Form: Principle 3



State Request: Kansas

Date: 7/19/12

## REVIEW AND EVALUATION OF REQUESTS

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

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

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

Principle 3: Supporting Effective Instruction and Leadership

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

3.A.i, Option B.i

*Tally of Peer Responses:* |2 YES, 0 NO|

Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement?	
Response Component	Panel Response

<p>Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement?</p>	
Response Component	Panel Response
<i>Rationale</i>	<p>Kansas State Department of Education (KSDE) has developed a standards-driven, multi-faceted evaluation system that includes multiple measures of educator performance. The system is focused on continuous improvement, as represented by the draft Educator Feedback Report which shows a four-year trend line for each measure. These guidelines for an educator evaluation system provide a foundation for improving instructional practice and improving student achievement.</p>
<i>Strengths</i>	<p>KSDE has based the professional practice portion of their evaluation system on standards. The guidelines cite the InTASC (Interstate Teacher Assessment and Support Consortium) standards, and the Interstate School Leaders Licensure Consortium (ISLLC), standards both of which provide a strong foundation for evaluation (p. 3). The Guidelines outline constructs for both teachers and principals for the components that will be measured (pp. 5 -7, 10-17).</p> <p>Teachers and principals were involved and continue to be involved in the design and adaptation of the Kansas Educator Evaluation Protocol (KEEP) (pp. C, D, E).</p> <p>There is strong evidence that KSDE has selected measures that have the potential to meaningfully differentiate levels of performance in professional practice.</p> <p>The draft Educator Feedback Report provides detailed information about teacher performance across a set of measures and context variables including the KEEP evaluation instrument, the Classroom Assessment Scoring System CLASS observation instrument, Academic Advancement of Former Students, indicators of whether students' academic performance is better than predicted, student dispositions (grades &amp; report cards), relationships (from surveys), school environment and support and local educational agency (LEA) support. Having detailed information on all of these aspects of teacher and student performance situated within context indicators should be helpful to teachers, principals, LEA leaders and the State in terms of understanding and supporting teacher effectiveness.</p>

Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement?	
Response Component	Panel Response
<i>Weaknesses, issues, lack of clarity</i>	<p>KSDE does not provide evidence that it will meaningfully differentiate performance in the area of student growth. The student growth model is yet to be developed and there is no specification of how student growth will be a significant component of the evaluation (p. G, H). Alternative measures to the State assessments are not specified and no guidance has been developed yet for LEAs to help them choose valid and reliable measures (pp. G, I).</p> <p>Although there are professional standards held as exemplars, there are no standards for professional learning that would contribute to ensuring quality professional development is offered.</p> <p>There is no description of the nature or level of training that will be provided to evaluators (p. G).</p> <p>Although KSDE responded to a question and stated that principals will make final judgments in evaluations, there is no indication of who will be given the responsibility of evaluating teachers. This will impact the reasonableness of the expectation placed on evaluators to perform multiple evaluations and whether this system can be carried out with fidelity.</p> <p>The complexity of the system may make it difficult for teachers, school leaders, and stakeholders to comprehend. Considerable resources will probably have to be invested in training—not just on the instruments but on how they fit together into a coherent whole, resulting in a score for an individual teacher or principal.</p>
<i>Technical Assistance Suggestions</i>	<p>A communication plan to help teachers, leaders, and stakeholders unpack and fully appreciate the complexity of the system will be needed. While many instruments and components are being field-tested, it is not necessarily productive to try to roll out all the components of the system at once. Changing the culture of teacher evaluation takes time and communication, and so many instruments introduced at once may be</p>

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<p>Response Component</p>	<p>Panel Response</p>
	<p>overwhelming to educators. Introducing them in a staggered manner may produce better buy-in which in turn will increase the validity of the results.</p> <p>Many of the measures chosen have the potential to add value to this evaluation system. KSDE must develop an implementation plan to clarify how it will ensure that it is carried out with integrity.</p>

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

3.A.i, Option B.iii

Tally of Peer Responses: |2 YES 0 NO, |

Did the SEA have <u>sufficient involvement of teachers and principals</u> in the development of these guidelines?	
Response Component	Panel Response
<i>Rationale</i>	At various stages in the process of developing a teacher and principal evaluation system, various groups of stakeholders were brought in to participate. For the evaluation design, the SEA brought in stakeholders selected from nominations, focusing on representing all students, including urban, rural, English Learners and students with disabilities (p. A). A group of stakeholders including teachers, principals and teacher association representatives assisted in drafting SEA guidelines for LEAs choosing to develop their own evaluation system or modifying their existing system. The Parent Teacher Association has been involved as well. The SEA continues to involve teachers and principals in the development, revisions, piloting and implementation of the instruments.
<i>Strengths</i>	<p>The KSDE Design Group was instituted in 2010 and is made up of a broad range of stakeholders including teachers and principals from high-need schools (p. A).</p> <p>In addition to the Design Group, LEAs piloting the evaluation system are working with KSDE to refine and adapt the Kansas Educator Evaluation Protocol (KEEP) (p. B).</p> <p>KSDE staff conducted regional meetings throughout the State discussing KEEP and the upcoming pilot (p. E).</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>It is unclear whether the group developing the guidelines will be active throughout the initial implementation.</p> <p>The SEA does not indicate how the involvement of stakeholders impacted the development of the system. It is not clear whether the representation from various groups shaped the evaluation system in particular ways.</p>

Did the SEA have <u>sufficient involvement of teachers and principals</u> in the development of these guidelines?	
Response Component	Panel Response
	It is impossible to tell whether the resulting KEEP system being piloted was developed in a way that respected the stakeholders' views.
<i>Technical Assistance Suggestions</i>	Continue to include stakeholders when results from pilots are analyzed.  It would enhance the proposal if KSDE was more explicit about designating long-term plans for stakeholder involvement. Implementation generally takes between five and seven years before it reaches sustainability.

3.A.ii.a

Tally of Peer Responses: | 2 YES 0 NO |

Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.*, will they promote systems that will...be used for continual improvement of instruction?

Consideration:

- *Are the SEA’s guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?*

Response Component	Panel Response
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<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>be used for continual improvement of instruction?</u></p> <p><u>Consideration:</u></p> <ul style="list-style-type: none"> <li>➤ <i>Are the SEA’s guidelines likely to result in <u>support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?</u></i></li> </ul>	
Response Component	Panel Response
<i>Rationale</i>	<p>All teachers and principals will be evaluated under the KSDE evaluation system. There is a system for reviewing local systems that must meet state guidelines.</p> <p>The SEA states that all evaluation instruments will support systems that will be used for continual improvement of instruction and provide feedback that guides professional development (p. C).</p>
<i>Strengths</i>	<p>KSDE’s Educator Evaluation Guidelines outline constructs for teacher and principal professional practice. Both contain segments that directly address instruction (pp. 6, 11).</p> <p>KSDE has endorsed the InTASC standards, and the ISLLC standards, ensuring that one of the six components in an aligned teacher evaluation and professional development system is present (p. 3).</p> <p>This proposal included a graphic that described various levels of professional development that would be tailored to educators dependent on the results of the evaluation (p. K).</p> <p>KSDE is using the CLASS, a valid and reliable observation protocol, in its pilot. This proposal states that a validity study during the pilot year will ensure that all educators are assessed with a valid and reliable instrument (p. D).</p> <p>KSDE states that professional development should be substantial, of high-quality, and intensive (p. N). The types of measures shown in the draft Educator Feedback Report could be used to provide actionable information to teachers in support of their professional growth.</p>

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>be used for continual improvement of instruction?</u></p> <p><u>Consideration:</u></p> <p>➤ <i>Are the SEA’s guidelines likely to result in <u>support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?</u></i></p>	
Response Component	Panel Response
<p><i>Weaknesses, issues, lack of clarity</i></p>	<p>KSDE does not address how it will monitor the quality of professional development state-wide. Although there is an expectation that research-based professional learning opportunities will be available, this proposal does not provide any guidelines to ensure that this will be the case.</p> <p>There is little information in the application about how the evaluation system is responsive to the needs of teachers of special populations (English Learners and students with disabilities). While including representation from those groups in the development of KEEP is important, it is not clear in what way their participation impacted the ultimate design. From the documentation provided, it does not appear that teachers of special populations are treated differently in the evaluation system than teachers of students in the general population.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>KSDE may want to consider adopting or endorsing professional learning standards such as the well-regarded and established <i>Standards for Professional Learning</i> published by <i>Learning Forward</i>, formerly the National Staff Development Council. These standards would provide a consistency of approaches that are research-based.</p> <p>The SEA should consider pulling together an ad-hoc advisory group of teachers of special populations to discuss both the evaluation processes and instruments and offer suggestions about how to ensure that these teachers are appropriately evaluated, particularly in the area of student growth. Because English Learners and students with disabilities may have very different growth trajectories, and because the learning objectives may be very different than general population students, it is essential that processes and instruments are used that fairly assess teachers’ contributions to student learning growth.</p>

3.A.ii.b

Tally of Peer Responses: (0 YES 2 NO) |

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>meaningfully differentiate performance using at least three performance levels?</u></p> <p><u>Consideration:</u></p> <p>➤ <i>Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?</i></p>	
Response Component	Panel Response
<i>Rationale</i>	A combination of student growth measures is used in the KEEP system to evaluate educators. However, KSDE will not develop a student growth model until 2013. The Kansas Educator Evaluation Guidelines have extensive constructs that set standards for teacher and principal professional practice. Educators will be rated on one of four levels of professional practice: highly effective, effective, progressing, and highly ineffective (p. 4).
<i>Strengths</i>	The teacher and principal constructs, based upon the InTASC and ISLLC Standards, are research-based (p. 3).  There is an outline of the considerations for a student growth model that include multiple measures, student growth percentiles and district assessments (p. G, H).
<i>Weaknesses, issues, lack of clarity</i>	Although it is stated that student growth measures will be a significant factor in the evaluation system, there is no definition of this significance (p. E). It is not clear from the documentation provided how the components of the evaluation system will be weighted. Thus, it is difficult to determine whether the weighting is sufficient.  It is not clear how educators who make significantly different contributions to student growth or closing achievement gaps are identified within the system, although it should be possible to analyze data from student

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>meaningfully differentiate performance using at least three performance levels?</u></p> <p><u>Consideration:</u></p> <p>➤ <i>Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?</i></p>	
Response Component	Panel Response
	<p>growth percentiles to identify teachers who are making excellent progress with specific subgroups. However, it is not clear from the documentation whether such educators will be differentiated solely on that basis or whether a combination of high scores on multiple measures would be required.</p> <p>KSDE barely addresses training for evaluators or which personnel will be evaluators. This is a concern both in terms of the reliability of evaluations and the logistics of meeting the evaluation schedule.</p>
<i>Technical Assistance Suggestions</i>	<p>The importance of training for evaluators is of fundamental importance for the successful implementation of an evaluation system. The Gates Measures of Effective Teaching (MET) Report outlines training and certification guidelines for observers and the effect that this training has on the validity and reliability of measures of professional practice.</p> <p>Staff training is one of the core components of successful implementation leading to sustainable changes in practice.</p> <p>Weights for various components of the educator evaluation system need to be clearly specified.</p>

3.A.ii.c.

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

3.A.ii.c.(i)

*Tally of Peer Responses:* | 0 YES 2 NO |

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

Does the SEA have a <u>process for ensuring</u> that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?	
Response Component	Panel Response
<i>Rationale</i>	<p>KSDE has chosen instruments for its pilot that have a strong research background, such as CLASS and Ron Ferguson’s Tripod student survey tool. The teacher and principal constructs in the Kansas Educator Evaluation Guidelines are research based and comprehensive. These factors ensure that the measures used are valid.</p> <p>The evaluation system includes multiple measures of educator performance including measures of teachers’ contributions to student learning growth. Student growth percentiles (Colorado Growth Model) are being used to determine how students performed relative to their peers, with class average growth attributed to teachers.</p>
<i>Strengths</i>	<p>Measures in the pilot are well validated and researched. LEAs that adopt the KEEP will be assured of having a set of valid instruments.</p> <p>The Tripod Survey developed by Harvard should provide some useful information about students’ perceptions of the classroom environment. The CLASS instrument will also focus on measuring teacher/student relationships and the learning environment. These measures should provide actionable information to teachers that they can use to inform their professional growth efforts.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The lack of a training program for evaluators calls into question whether evaluations will be reliable and whether the system will be implemented in a consistent and high quality manner throughout the state.</p> <p>The system for approving locally-designed evaluation systems is comprised of a field-trained group of peer evaluators (p. C). There is no description of the scope or nature of this training. It is also questionable whether this group will have the time or capacity to evaluate all of the locally designed systems that may be submitted.</p>

<p>Does the SEA have a <u>process for ensuring</u> that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?</p>	
<p>Response Component</p>	<p>Panel Response</p>
	<p>Because the measures that will be included in student growth are not established yet, it is difficult to determine whether they will be valid or under what criteria they will be judged.</p> <p>Although the measures are good and have the potential to contribute to a valid and reliable educator evaluation system, there is insufficient evidence about whether a realistic implementation plan has been developed to support their use.</p> <p>The validity of using student growth percentiles and student learning objectives to determine teachers' contributions to student learning growth has not been established because they have only recently been incorporated into educator evaluation systems. The validity of the KEEP standards-based rubric has yet to be established (it is being piloted).</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>KSDE will need a more detailed description of how locally designed evaluation systems will be evaluated and approved and how they will ensure that the measures in these systems will be valid measures.</p> <p>The Tripod Survey can be a particularly useful tool for teacher, team, and school reflection that may lead to improved outcomes. Guidance should be provided in how those results might be used to develop teacher, team and school goals focused on the “7 Cs” of the Tripod survey.</p> <p>Results (data) from other instruments and measures need to be analyzed in order to establish whether the measures are accurately differentiating among teachers at different levels of performance. Triangulating data from different measures will be helpful in establishing validity, <i>i.e.</i>, one would expect an effective teacher to score highly on all measures and an ineffective teacher to score poorly on all measures.</p>

Does the SEA have a <u>process for ensuring</u> that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?	
Response Component	Panel Response
	While KSDE has clearly given great consideration to selecting measures that will produce valid and reliable results, it appears that more effort is needed to implement these measures in a consistent and high-quality manner across all LEAs so that they will meet expectations for differentiating among educators’ performance. There is a body of research in implementation strategies that provides guidance for States in designing an implementation plan that will effectively establish an educator evaluation system that will be sustainable.

3.A.ii.c(ii)

*Tally of Peer Responses:* | 2 YES 0 NO |

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

For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a <u>statewide approach</u> for measuring student growth on these assessments?	
Response Component	Panel Response
<i>Rationale</i>	<p>LEAs will use Kansas State Assessments in the grades and subjects in which the assessments are administered. Multiple categories of evidence of student learning must be used. The categories of student outcomes include: student growth percentiles, Assessment Performance Index (API), LEA assessment with pre- and post-assessments (such as NWEA’s Measures of Academic Progress), and within-course assessments developed collaboratively to yield results that will be comparable across classrooms.</p> <p>KSDE has in place a testing regime covering all the required subjects and grades, and is currently planning to use a student growth percentile model (Colorado Growth Model) to assess student progress over time. The guidelines for using the student growth factor will not be finalized until the end of the 2012-2013 school year.</p>
<i>Strengths</i>	<p>KSDE does have an outline of the kinds of methods it is considering to measure student growth. They intend to use student growth percentiles that they have been calculating for four years. It is commendable that they are recommending that there should be a minimum of four cohorts of students to discern meaningful patterns of student growth (p. G).</p> <p>KSDE is able to link teacher and student data for the purpose of determining teachers’ contributions to student learning growth with the student growth percentile model. The state is working with the leading contractor for student growth percentile models (the Center for Assessment).</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The level of significance (weighting) of the student growth portion of the evaluation is not established.</p> <p>The LEA- or classroom-based assessments that may be used have not yet been determined. There is a statement about an ideal combination of formative, interim, and summative assessments being collaboratively developed by teachers but this does not seem firmly embedded or required (p. H).</p> <p>Little research has been done on using the student growth percentile models (Colorado Growth Model) to differentiate among teachers in terms of their contribution to student learning growth.</p>

<p>For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a <u>statewide approach</u> for measuring student growth on these assessments?</p>	
<p>Response Component</p>	<p>Panel Response</p>
	<p>The API is described in follow-up notes as “an index and average that takes all levels of student performance on assessments into account” so that it can be aggregated to a teacher, team, school, etc. Thus, using both the API and one other measure from the categories described will result in counting results from one of the measures twice—once on its own and once as part of the data that results in the API. This could cause issues in statistical analysis.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>States have taken different approaches to determining the significance of various components in their evaluation systems and applied weightings in different ways. KSDE may want to consider examining some of those State models such as New York, Rhode Island, Massachusetts, or Indiana, to determine whether those strategies might be useful in developing KSDE’s weighting system. As an example, a percentage range for how student growth measures will be weighted could be designated. This would define the level of significance.</p> <p>KSDE should keep current with the research on the use of student growth percentiles for teacher evaluation as it becomes available and make adjustments as needed to ensure that evaluations based on results from this model are fair and accurate.</p> <p>Consider making the API a separate measure, rather than using it as one of the measures that an LEA uses in the calculation for the combined average score. It may be more appropriate to use it as a <b>school</b>-level measure rather than as an individual teacher-level measure. Stakeholder input should be sought in order to determine if this plan would be acceptable to teachers, leaders, and other stakeholders.</p>

3.A.ii.c(iii)

Tally of Peer Responses: 0 YES 2 NO

<p>For <u>grades and subjects in which assessments are not required</u> under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?</p>	
Response Component	Panel Response
<i>Rationale</i>	<p>KSDE proposed to use such measures as district assessments with pre- and post-assessments (such as NWEA’s Measures of Academic Progress), and within-course assessments developed collaboratively to yield results that will be comparable across classrooms.</p> <p>KSDE does not provide adequate guidance about how measures of student growth will be combined for subjects in which state assessments are not required. In addition, there is little detail about how alternative measures will be developed.</p>
<i>Strengths</i>	<p>There is a requirement that multiple measures of student growth must be used, and should yield a more complete picture of teachers’ contributions to student learning growth and should provide information teachers can use to improve instruction (p. G).</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>Criteria must be developed that will provide guidance on how LEAs will determine appropriate student growth measures other than State-level assessments (p. H). In addition, a process to develop and/or identify appropriate alternative measures to be used in this system has not been outlined.</p>
<i>Technical Assistance Suggestions</i>	<p>A list of acceptable measures should be provided as guidance to LEAs or clear criteria for determining the suitability of considered measures. Stanley Rabinowitz’s work on leveled data sources provides guidance on validating assessments. The Assessment and Accountability Comprehensive Center has created a number of guidance documents and tools that may be helpful with this process.</p> <p>This is an area where few measures are available to measure student growth in many subjects, such as art, music, foreign languages, etc. KSDE may want to convene a technical advisory group and/or consult with other states which are further along in this process to develop a more focused plan for alternative measures of</p>

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<p>Response Component</p>	<p>Panel Response</p>
	<p>student learning growth.</p> <p>Once appropriate measures have been identified and/or created, a pilot process needs to be established to validate these measures for the use of differentiating among teachers at different performance levels.</p>

## 3.A.ii.d

Tally of Peer Responses: | 2 YES 0 NO |

Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i> , will they promote systems that will... <u>evaluate teachers and principals on a regular basis?</u>	
Response Component	Panel Response
<i>Rationale</i>	Teachers and leaders will be evaluated annually, on a timeline that is appropriate to their level of experience.
<i>Strengths</i>	It is stated in the Educator Evaluation guidelines that multiple observations are required as part of the evaluation (p. 5).  KSDE is creating a system that focuses more evaluation resources (in terms of evaluator time) on new teachers and fewer resources on teachers that have already demonstrated effectiveness. Depending on prior years’ ratings, teachers will develop growth plans that are self-directed, directed, or “improvement”-focused. Differentiating teacher evaluation in this way is a more appropriate use of resources than a one-size-fits-all evaluation model that requires all teachers to undergo the exact same evaluation.
<i>Weaknesses, issues, lack of clarity</i>	KSDE has not identified which personnel will be responsible for conducting evaluations or what level of training they will receive.  There is no requirement for multiple evaluators, a component of observations that can improve reliability, as established by research.  In high-turnover schools, there are likely to be many more new teachers. This could put a considerable strain on resources in these schools given the greater intensity of evaluation and support under this system. Because principals and teachers in high-turnover schools tend to have other challenges as well (poverty, low achievement, absenteeism), staff time at these schools may already be stretched.
<i>Technical Assistance Suggestions</i>	There is strong evidence that the reliability of observation ratings is dependent on multiple observations <u>and</u> multiple evaluators. KSDE should move towards a system that ensures that multiple evaluators are used. KSDE must establish who the evaluators will be and ensure that the workload of evaluators is reasonable to

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<p>Response Component</p>	<p>Panel Response</p>
	<p>ensure that the system will be carried out with fidelity.</p> <p>KSDE should consider targeted funding for schools and LEAs with greater numbers of new teachers in order to ensure that the evaluation procedures can be performed and professional growth opportunities can be offered at levels equivalent to other schools.</p>

3.A.ii.e

Tally of Peer Responses: | 2 YES 0 NO |

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

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?</u></p> <p><u>Considerations:</u></p> <ul style="list-style-type: none"> <li>➤ <i>Will the SEA’s guidelines ensure that evaluations occur with a <u>frequency</u> sufficient to ensure that feedback is provided in a timely manner to inform effective practice?</i></li> <li>➤ <i>Are the SEA’s guidelines likely to result in <u>differentiated professional development</u> that meets the needs of teachers?</i></li> </ul>	
<p>Response Component</p>	<p>Panel Response</p>
<p><i>Rationale</i></p>	<p>The frequency of evaluations will contribute to the timeliness of the feedback. The standards-based guidelines provide a good foundation for the content of feedback.</p> <p>The system as described should provide ample feedback to teachers to improve their practice. The SEA has adopted guidelines for teacher and principal evaluation that include four levels of performance. According to the Kansas Educator Evaluation Protocol, different professional growth strategies result from different levels of performance, including a self-directed plan for effective/highly effective performance, a directed plan for “progressing” and a 12-month improvement plan for low performance.</p> <p>In SEA guidance for those LEAs developing their own evaluation system, the SEA states that, “Districts must explain how feedback is clear, timely and useful and how it guides professional development.”</p>
<p><i>Strengths</i></p>	<p>Using the research-based constructs from the Educator Evaluation Guidelines is likely to structure feedback so that it is relevant and applicable to the work of those being evaluated.</p> <p>Professional development is an explicit component of both the teacher and principal evaluation systems as demonstrated in the Kansas Educator Evaluation Protocol (p. F).</p> <p>The multiple measures (surveys, student learning objectives, CLASS observations, and KEEP evaluation) have the potential to provide an abundance of useful data about teachers’ practice.</p>

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?</u></p> <p><i>Considerations:</i></p> <ul style="list-style-type: none"> <li>➤ <i>Will the SEA’s guidelines ensure that evaluations occur with a <u>frequency</u> sufficient to ensure that feedback is provided in a timely manner to inform effective practice?</i></li> <li>➤ <i>Are the SEA’s guidelines likely to result in <u>differentiated professional development</u> that meets the needs of teachers?</i></li> </ul>	
Response Component	Panel Response
	<p>Different professional growth plans for educators based on their evaluation results is a good strategy that allows competent teachers considerable flexibility while focusing resources on teachers who need more supervision and guidance.</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>The data produced from teacher evaluation, including evidence of teaching practice and student outcomes, will be of limited value to teachers and principals unless they are trained in how to link the data to instructional practices in ways that will produce better student outcomes.</p> <p>There is insufficient guidance about the frequency or nature of feedback to those being evaluated. In asking districts to “...explain how feedback is clear, timely and useful and how it guides professional development,” the SEA is making an assumption that LEAs have the capacity to determine how evaluation feedback will be used to guide professional development. Districts will likely need more guidance in this area.</p> <p>This training is essential to ensure appropriate, relevant feedback to teachers which results in differentiated professional development.</p>
<i>Technical Assistance Suggestions</i>	<p>More specific requirements for multiple evaluators, explicit descriptions of training for evaluators, and more detailed guidance regarding the frequency and nature of feedback would enhance this proposal.</p> <p>If teachers and principals are going to be able to use the data produced from the evaluation process to</p>

<p>Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i>, will they promote systems that will...<u>provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?</u></p> <p><u>Considerations:</u></p> <ul style="list-style-type: none"> <li>➤ <i>Will the SEA’s guidelines ensure that evaluations occur with a <u>frequency</u> sufficient to ensure that feedback is provided in a timely manner to inform effective practice?</i></li> <li>➤ <i>Are the SEA’s guidelines likely to result in <u>differentiated professional development</u> that meets the needs of teachers?</i></li> </ul>	
Response Component	Panel Response
	<p>improve teaching and learning, they will likely need guidance and training. It is doubtful that most LEAs will have the capacity to develop training or hire a consultant to do that training, so the SEA may need to invest in guidance documents and professional development.</p>

## 3.A.ii.f

Tally of Peer Responses: | 2 YES 0 NO |

Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — <i>i.e.</i> , will they promote systems that will... <u>be used to inform personnel decisions?</u>	
Response Component	Panel Response
<i>Rationale</i>	KSDE explicitly states that the results of the evaluation will be used for decisions in the areas of retention, promotion, compensation, and rewards (p. 8).
<i>Strengths</i>	LEAs will be required to explain how their system will address personnel decisions in their application for approval (p. N).  KSDE refers to Kansas statutes indicating that a “highly ineffective” rating gives the school district the authority “...to non-renew on the basis of incompetence if the evaluation has been completed prior to the notice of non-renewal.”
<i>Weaknesses, issues, lack of clarity</i>	KSDE provides limited information about <u>how</u> the state model will be used to inform personnel decisions.  While KSDE’s guidance document indicates that LEAs must “...explain how their evaluation systems are used to inform decisions in areas such as retention, promotion, compensation and rewards,” the State has not clarified in its description of its own model how retention, promotion, compensation and rewards will be impacted by educator evaluation.
<i>Technical Assistance Suggestions</i>	KSDE has correctly focused on the most important outcome of educator evaluation: improving teaching and learning. However, improving teaching requires not only diagnostic evaluations and strong professional growth opportunities but also policies that advance a more competent and effective workforce to serve Kansas’s education needs. The policy seems to focus on the punitive aspect only—identifying “highly ineffective” teachers and providing them with a year-long improvement plan and then not renewing their contract if they fail to improve. While this is a necessary policy to ensure that ineffective teachers are removed from the classroom, there need to be additional policies to address the roles of promotion, compensation, and rewards in strategically advancing the quality and retention of the effective workforce.

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

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

Considerations:

- *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*
- *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
- *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
- *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems?*
- *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
- *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
- *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
- *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

## 3.B. (continued)

Tally of Peer Responses: | 2 YES 0 NO |

Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? (see considerations above)	
Response Component	Panel Response
<i>Rationale</i>	There is a plan and timelines to scale up the implementation of the evaluation system by 2013 to include all schools in Kansas. This ensures that each LEA will develop or adopt, pilot, and implement the system with the involvement of teachers and principals.
<i>Strengths</i>	<p>The proposed system includes all teachers and principals, ensuring that teachers working with special populations will be assessed and will have equitable access to opportunities that emerge from the evaluation system.</p> <p>Input from Teachers and principals is required by school boards when adopting written policies (p. 7).</p> <p>The schedule of pilots in the 2011-12 and 2012-13 school year indicates a realistic scaling up of practice (p. F).</p> <p>There has been good communication and dissemination of information to the pilot districts. KSDE has developed a KEEP repository for use by pilot districts. The technical assistance provided to pilot districts has been extensive and has included face-to-face and electronic modes (pp. D, E).</p>
<i>Weaknesses, issues, lack of clarity</i>	<p>It is unclear whether the State will have the capacity to carry out the process for approving and reviewing LEAs' systems if they are submitted for approval to the peer reviewers.</p> <p>The training provided for evaluators is not sufficiently described to ensure that evaluation results will be valid and reliable.</p> <p>There are no standards for professional learning which impacts the ability of the KSDE to monitor the</p>

<p>Is the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA’s adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems? <i>(see considerations above)</i></p>	
<p>Response Component</p>	<p>Panel Response</p>
	<p>quality of professional development.</p> <p>It is unclear who will oversee the pilots and continue to adapt the system for the first full year of implementation. There should be a plan for continued oversight and stakeholder input.</p> <p>The capacity of the KSDE to carry out the work of implementation is questionable. The KSDE Milestones and Timelines rubric explicitly identifies these capacity issues in the “significant obstacles” column (p. L).</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>A more robust monitoring system needs to be developed. Once all evaluation systems are in place, ensuring the fidelity of implementation will be a challenge. Refer to <a href="#"><u>Implementation Research: A Synthesis of the Literature</u></a> for relevant research on bringing initiatives to sustainable levels (Fixsen, 2005).</p> <p>The limited capacity of the SEA may hinder the implementation of the educator evaluation system. Creating greater capacity at the LEA and school level through training and guidance will be essential in order to carry out the ambitious goals of this work.</p> <p>The evaluator-related issues of training, multiple evaluators, and providing useful feedback are in need of development. The Gates MET study provides relevant research and guidelines in this area.</p>

Principle 3 Overall Review

*Tally of Peer Responses: 0 YES 2 NO*

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

<p>Are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?</p>	
<p>Response Component</p>	<p>Panel Response</p>
<p><i>Rationale</i></p>	<p>Although KSDE has a well-developed system of standards for professional practice (KEEP) and has chosen measures of student growth and achievement that could contribute to an educator evaluation system, the system itself is not fully developed. Until the system is more completely developed it will be difficult to have confidence in its ability to improve teaching and learning.</p> <p>KSDE’s guidelines and processes are not adequate to ensure that LEAs will develop or adopt, pilot, and implement evaluation and support systems to a level that will improve instruction and increase student achievement.</p> <p>It is unclear from the information and documentation provided that the KSDE has an adequate plan and sufficient capacity to implement an evaluation system that will be likely to increase the quality of instruction for student achievement. While good measures have been selected, KSDE has not provided a coherent and comprehensive plan detailing how they will provide guidance, support, and training to implement the measures, use results from the measures to differentiate among educator effectiveness levels, and improve effectiveness and student outcomes.</p>
<p><i>Strengths</i></p>	<p>KSDE has based the professional practice portion of their evaluation system on standards. The guidelines cite the InTASC standards, and the ISLLC Standards both of which provide a strong foundation for evaluation. The Guidelines outline constructs for both teachers and principals that set the components that will be measured.</p> <p>Teachers and principals were involved and continue to be involved in the design and adaptation of KEEP. At the local level, input from teachers and principals is required. The guidelines also specify that teachers of special populations will be evaluated and will have equal access to professional supports.</p>

<p>Are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?</p>	
Response Component	Panel Response
	<p>There is an explicit requirement for LEAs to use evaluation results for personnel decisions.</p> <p>There is strong evidence that KSDE will meaningfully differentiate levels of performance in professional practice.</p> <p>The draft Educator Feedback Report should be useful in providing detailed information numerous aspects of teacher and student performance situated within context indicators should be helpful to teachers, principals, LEA leaders and the state in terms of understanding and supporting teacher effectiveness.</p> <p>KSDE is able to link teacher and student data for the purpose of determining teachers’ contributions to student learning growth with the student growth percentile model. The State is working with the leading contractor for student growth percentile models (the Center for Assessment).</p> <p>KSDE is creating a system that focuses more evaluation resources (in terms of evaluator time) on new teachers and fewer resources on teachers that have already demonstrated effectiveness. Differentiating teacher evaluation in this way is a more appropriate use of resources than a one-size-fits-all evaluation model that requires all teachers to undergo the exact same evaluation.</p> <p>If the system is implemented as described, the results from multiple measures should generate ample information for teachers to improve their practice.</p> <p>According to the Kansas Educator Evaluation Protocol, different professional growth strategies result from different levels of performance, including a self-directed plan for effective/highly effective performance, a directed plan for “progressing” and a 12-month improvement plan for low performance.</p>

<p>Are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?</p>	
<p>Response Component</p>	<p>Panel Response</p>
<p><i>Weaknesses, issues, lack of clarity</i></p>	<p>KSDE does not provide evidence that it will meaningfully differentiate performance in in the area of student growth. The student growth model is yet to be developed and there is no specification of the weight that it will be given in the evaluation. Measures that are not related to state assessments are not specified and no guidance is offered to LEAs to help them choose valid and reliable measures.</p> <p>Although there are professional standards held as exemplars, there are no standards for professional learning that would contribute to ensuring quality professional development is offered.</p> <p>There is no description of the nature or level of training that will be provided to evaluators.</p> <p>There is no indication of who will be given the responsibility of evaluating teachers or whether teachers will have multiple evaluators. This will impact the reasonableness of the expectation placed on evaluators and whether this system can be carried out with reliability and with fidelity.</p> <p>KSDE has not provided evidence that it has the capacity to approve and monitor LEAs evaluation systems.</p> <p>There is little information in the application about how the evaluation system is responsive to the needs of teachers of special populations (English Learners and students with disabilities). While including representation from those groups in the development of KEEP is important, it is not clear in what way their participation impacted the ultimate design.</p> <p>There is insufficient guidance about the frequency or nature of feedback to those being evaluated. In asking districts to “...explain how feedback is clear, timely and useful and how it guides professional development,” the SEA is making an assumption that LEAs have the capacity to determine how evaluation feedback will be</p>

<p>Are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?</p>	
<p>Response Component</p>	<p>Panel Response</p>
	<p>used to guide professional development. Districts will likely need more guidance in this area.</p>
<p><i>Technical Assistance Suggestions</i></p>	<p>KSDE should be mindful of the need for continual training of those at the SEA level who are responsible for providing technical assistance to the LEAs.</p> <p>The Assessment and Accountability Comprehensive Center has created a number of guidance documents and tools that may be helpful with this process.</p> <p>KSDE has correctly focused on the most important outcome of educator evaluation: improving teaching and learning. However, improving teaching requires not only diagnostic evaluations and strong professional growth opportunities but also policies that advance a more competent and effective workforce to serve Kansas’ education needs. The policy seems to focus on the punitive aspect only—identifying “highly ineffective” teachers and providing them with a year-long improvement plan and then not renewing their contract if they fail to improve. While this is a necessary policy to ensure that ineffective teachers are removed from the classroom, there need to be additional policies to address the roles of promotion, compensation, and rewards in strategically advancing the quality and retention of the effective workforce.</p> <p>The SEA should consider pulling together an ad-hoc advisory group of teachers of special populations to discuss both the evaluation processes and instruments and offer suggestions about how to ensure that these teachers are appropriately evaluated, particularly in the area of student growth. Because English Learners and students with disabilities may have very different growth trajectories, and because the learning objectives may be very different than general population students, it is essential that processes and instruments are used that fairly assess teachers’ contributions to student learning growth.</p>

<p>Are the SEA’s guidelines and the SEA’s process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?</p>	
<p>Response Component</p>	<p>Panel Response</p>
	<p>Weights for various components of the educator evaluation system need to be clearly specified.</p> <p>KSDE should keep current with the research on the use of student growth percentiles for teacher evaluation as it becomes available and make adjustments as needed to ensure that evaluations based on results from this model are fair and accurate.</p> <p>KSDE should consider targeted funding for schools and LEAs with greater numbers of new teachers in order to ensure that the evaluation procedures can be performed and professional growth opportunities can be offered at levels equivalent to other schools.</p> <p>KSDE should focus its efforts on developing a comprehensive strategic plan for training, guidance and technical assistance that will be provided to LEAs to insure that the evaluation system is implemented in a uniform and high quality manner. The National Comprehensive Center for Teacher Quality is an excellent resource for assistance in developing such an implementation plan.</p> <p>The importance of training for evaluators to insure valid and reliable scoring and feedback cannot be emphasized enough. The Gates MET study is a good source of information about critical variables in training.</p>