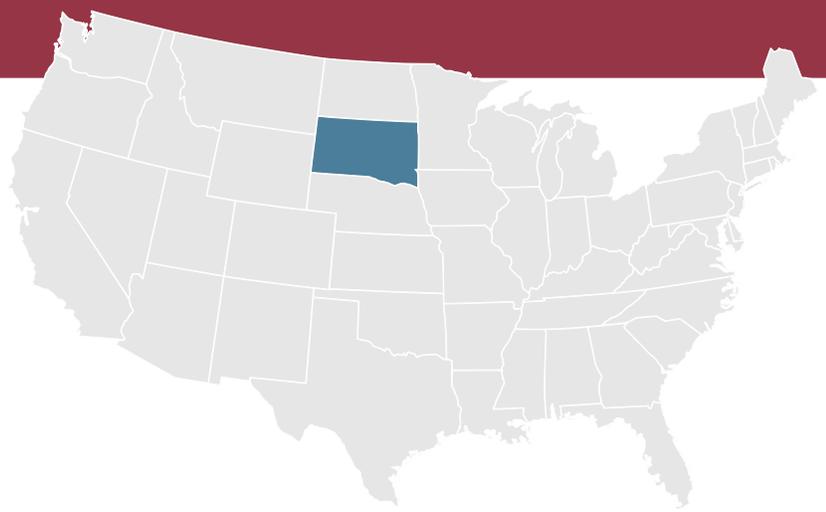


An Independent Review of ESSA State Plans



South Dakota

Project Overview

Bellwether Education Partners, in partnership with the Collaborative for Student Success, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state’s accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After reviewing independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you’ll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of September–November 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website [here](#).

Overall Strengths and Weaknesses

Strengths: What are the most promising aspects of the state’s plan? What parts are worth emulating by other states?

South Dakota plans to measure school performance using a clear set of indicators that are focused on students’ academic success, rewarding multiple pathways of students’ preparedness for college or career. The state is committed to high standards and rigorous, aligned assessments, and its School Performance Index also gives substantial weight to both achievement and growth, recognizing student progress across the performance spectrum.

South Dakota has also clearly sought out and listened to feedback from stakeholders. Throughout its plan, it cites specific input as an explanation for why it’s pursuing the options it chose, and indicates it will work with external partners to build its own capacity, particularly with regard to school improvement. Moreover, the plan articulates specific steps it is taking to improve its consultation with Native American tribes moving forward, demonstrating a commitment to continuous improvement as well as a recognition of the importance of supporting these students and the schools that serve them.

Weaknesses: What are the most pressing areas for the state to improve in its plan? What aspects should other states avoid?

South Dakota identifies schools for support based on the results of individual subgroups, but only considers combined subgroups in the School Performance Index (SPI). Although the state includes data showing that, for many small schools and districts, the combined subgroup may be the only way to include any subgroup data in the index, schools may still be able to receive a high overall rating, even though one of its individual subgroups is not making progress. Similarly, South Dakota’s plan lacks clarity on how exactly it will identify schools with large achievement gaps or low-performing subgroups for support, and doesn’t specify how many schools will be identified or what steps they will take to improve.

More broadly, South Dakota’s School Performance Index, which summarizes school-level results each year, is complex; the state will need to ensure that it has a clear way of explaining it to parents, educators, and community members. Lastly, the state’s plan for improving low-performing schools lacks specificity, particularly with regard to building capacity to implement evidence-based interventions and the strategies the state will require in schools failing to improve.

Plan Components

Each state’s plan has been rated on a scale of 1 (“This practice should be avoided by other states”) to 5 (“This could be a potential model for other states”).

Goals: Are the state’s vision, goals, and interim targets aligned, ambitious, and attainable? Why or why not?



South Dakota articulates a clear strategic vision for all students to be ready for college, career, and life, with 65 percent of adults between 25 and 34 earning a postsecondary credential by 2025. The state has also determined key milestones to help reach this overarching vision: All students will be proficient in reading by 4th grade, all students will enter 9th grade proficient in math, gaps will close and academic success for Native American students will increase, and all students will graduate ready for college and career.

For its ESSA goals, the state should be commended for setting the same long-term goal for all student groups. South Dakota expects 100 percent of students to be proficient in both English language arts (ELA) and math and 100 percent of students to graduate on time by 2030-31. While these goals are certainly ambitious, especially for subgroups, they will likely prove challenging to attain.

To elaborate, the state includes two interim targets, at five and ten years, within its 13-year goals. The interim targets are set so that the all-students group and each subgroup is expected to reach the level of performance currently achieved by schools at the 50th and 75th percentile, respectively. For example, currently just 15 percent of Native American students score proficient in math, yet they are expected to reach 44 percent proficiency in five years and 57 percent in ten years. However, the same ten-year target (57 percent) also applies for all students, who are starting at a much higher baseline of 46 percent. That said, the more significant problem is that all groups are then expected to increase their math proficiency from 57 percent to 100 percent in just three years, a seemingly unrealistic rate of progress across the board.

Finally, South Dakota does not provide a baseline for its English language proficiency (ELP) long-term goals, which makes it challenging to determine how rigorous the first initial target (50 percent) will be. Regardless, by 2030-31, its long-term goal expects 100 percent of English learners to be making sufficient progress to reach ELP within five years. This goal, while obviously ambitious, may also prove to be challenging to attain over time.

Standards and Assessments: Is the state’s accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

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South Dakota remains committed to rigorous college- and career-ready standards based on the Common Core State Standards and is using Smarter Balanced Assessment Consortium as its statewide assessment in English language arts and math in grades 3-8 and high school, a strong foundation for its accountability system that will help the state meet the educational needs of all students.

One unique feature of South Dakota’s plan is its attention to Native American students, who make up 15 percent of the state’s population. While there are no plans to develop tests in Native American languages, as they are historically spoken, not written, and are often spoken by students who are not English learners, the state should be commended for including details regarding the prevalence of these and other languages. None of the non-Native American languages meet the state’s threshold to be considered present to a significant extent (5 percent of the student population). South Dakota has also articulated a clear method for measuring English language proficiency using the WIDA ACCESS 2.0 assessment.

The state does indicate it is interested in pursuing innovative assessment opportunities that would permit schools to assess students at their level of learning, rather than against grade-level standards. As the state explores competency-based approaches to assessment, it should take care to proceed in a way that continues to ensure all students, particularly those who are further behind, are expected to meet college- and career-ready expectations.

Lastly, South Dakota could strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, including the process in place to meet the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities.

Indicators: Are the state’s chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?

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South Dakota has proposed a simple, and mostly high-quality, list of indicators focused on student learning, including academic achievement and growth, English language proficiency (ELP), chronic absenteeism, graduation and completion rates, chronic absenteeism, and college and career readiness. Growth and chronic absenteeism only apply to elementary and middle schools, while graduation, completion, and college and career readiness apply to high schools.

South Dakota deserves recognition for its approach to measuring growth for English learners toward ELP. The state has created an index, awarding extra credit for students who achieve ELP more quickly than expected and partial credit for students who show some growth, but not enough to meet proficiency in the expected timeline. In addition, when a school does not have enough English learners to meet the minimum group size, the school will be held accountable based on district-level data if the district has at least ten English learners overall, increasing the number of schools where ELP can be included. This is a practice other states with small populations of English learners should consider.

Reflecting stakeholder feedback that additional measures of student success should be included, the state will include the percentage of graduates who are postsecondary-ready—as evidenced by assessment results (e.g., on Smarter Balanced, the ACT, state-approved high school remediation, or WorkKeys) and as evidenced by progress toward earning a postsecondary credential (e.g., earning a C in dual enrollment or Advanced Placement [AP] courses, scoring a three or higher on an AP exam, completing two units of study as a career and technical education [CTE] concentrator, or completing two CTE foundation courses or capstone experiences with at least a C grade). Although the state does not currently collect data on all of these measures and should clarify what tests have been approved as remedial measures, its commitment to broadening its college- and career-readiness indicator should be recognized. Moving forward, South Dakota should monitor its data to ensure that all of these options are equally predictive of success, but it deserves credit for pushing in a direction that allows students to demonstrate advanced skills along multiple pathways.

South Dakota's graduation rate indicator only includes the four-year graduation rate, but this choice is undermined by the inclusion of a second indicator of high school completion, which would include GEDs in the calculation. While this measure will show how well schools are helping students progress to any kind of credential, regardless of time or rigor, South Dakota should consider the emphasis it is placing on completion relative to on-time graduation, given the state's goal of ensuring that students graduate both on time and college and career ready.

A final area that could use further clarification is South Dakota's approach to determining several measures. For its ELP and academic achievement indicators, the state plans to assign different numbers of points to students scoring at different levels, including a quarter point for students scoring at the lowest performance level. South Dakota should provide a rationale for this approach, given how far these students are from attaining proficiency. For its chronic absenteeism indicator, defined as students' missing 10 percent or more of their enrolled days, South Dakota should clarify what absences are exempt from the calculation and whether it will count absences due to suspensions/expulsions.

Academic Progress: Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

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South Dakota deserves credit for designing a system that equally balances incentives for students to meet or exceed grade-level standards and, particularly for those students who are not yet proficient, to make progress year-over-year. The state plans to use an index to measure achievement in ELA and math, averaging three years of data and giving extra weight to students at the advanced level and partial weight to students who are not yet proficient. Critically, the index incentivizes schools to focus on students across the performance spectrum, but does not allow students scoring at advanced levels to fully compensate for lower-performing ones (though there is some concern among peers for awarding minimal credit to students scoring at the lowest level).

South Dakota also measures student growth toward proficiency in grades 4-8 for all students and the lowest-performing quartile of students in both ELA and math. The state will award schools credit for students who are “keeping up” by achieving proficiency and a rate of growth that predicts they will remain proficient, and for students who are “catching up” by demonstrating growth that predicts they will reach proficiency within three years. But the state also awards credit for students who show “very high growth” at the 70th percentile compared to similar peers. Recognizing comparatively high growth may be a reasonable decision, but if a student is very low performing, even growth at the 70th percentile year-over-year may not be enough. South Dakota’s plan could be strengthened by providing evidence for why this is a meaningful cutoff.

All Students: Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

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South Dakota’s School Performance Index (SPI), which evaluates school quality each year, does not take results of individual groups of students into account. Specifically, achievement will not be calculated in the SPI for all students, instead examining two combined subgroups: one consisting of all individual groups that are higher performing on average in the state (called the Non-Gap group), and another consisting of the groups that tend to be lower performing (called the Gap group). The relative weight between the Non-Gap and Gap groups will be based on the proportion of students in each within a school’s total enrollment, which is equivalent to calculating a schoolwide average and may mask the performance of underserved students. Remaining indicators will only be measured for the all-students group, with the exception of growth, which will also include the lowest-performing quartile of students.

Given the number of very small schools and districts, South Dakota presents a compelling rationale for using combined subgroups of students in some cases (like small schools). That said, South Dakota should consider using the combined groups in the SPI only when a school does not have enough students in an individual group to meet the state’s minimum group size (10 students), since some schools have sufficient numbers of students in individual groups. This is similar to its policy for identifying schools for targeted support, where a school may be identified due to a low-performing Gap group or a low-performing individual group, which increases the number of schools that could be identified and provides greater focus on the lowest-performing students. However, South Dakota’s approach to identifying schools for targeted support is unclear in other respects, making it challenging to determine, overall, if it will be sufficiently rigorous to identify all schools that underserve one or more student groups, combined or otherwise (see more below).

South Dakota does deserve credit for setting the minimum number of students to include a group in accountability decisions at ten, for holding schools accountable based on district-level ELP results if necessary, and for combining data across multiple years, where possible, which helps include more schools and students in its accountability system, given the number of very small schools. In addition, if more than 5 percent of students in a school fail to take required assessments, additional non-participating students will be awarded zero weight in the achievement index, providing at least some incentive for schools to ensure students participate in annual tests.

Finally, South Dakota’s ESSA plan explicitly references its State Systemic Improvement Plan under the Individuals with Disabilities Education Act. This plan focuses on increasing reading proficiency for students with disabilities. Including it in the state’s ESSA plan demonstrates a commitment to educating all students, and to integrating and aligning state improvement efforts across programs.

Identifying Schools: Is the state’s plan to identify schools for comprehensive and targeted support likely to identify the schools and student groups most in need?



South Dakota’s School Performance Index (SPI) will provide an overall score, from 0 to 100, for all schools that strongly emphasizes academic achievement, growth, and college and career readiness. The final SPI score tallies points earned across all of the state’s indicators, though South Dakota will also show indicator-specific performance on its report cards to help place the overall score in context. The state should take steps to ensure these results are presented clearly, as the SPI is complex for parents, educators, and the community to unpack, using multiple indices at the indicator level and averaging data over multiple years. The SPI will also be used to identify the state’s lowest-performing schools, creating strong alignment between the index and identification for comprehensive support. South Dakota’s plan to identify schools with struggling subgroups for targeted support, however, lacks sufficient detail and could be strengthened.

South Dakota will use the SPI to annually identify its lowest-performing 5 percent of Title I schools and will rank elementary and middle schools separately from high schools to make comprehensive support determinations. The state will also identify high schools that graduate less than 67 percent of students each year, though it should clarify that this determination will be based on its graduation rate indicator, and not the less rigorous completion rate.

For targeted support, South Dakota’s definition of what constitutes a consistently underperforming subgroup is unclear and its use of a 95 percent confidence interval will likely reduce the number of schools identified. The state has not fully defined many components of its approach. For example, the plan does not specify what level of disparity between all students and a particular subgroup would qualify a school for identification, only that a disparity “may” trigger identification; whether disparities need to be evident on single indicator, multiple indicators, or on the SPI as a whole; whether disparities will be examined within schools or by comparing subgroups to state averages; and so on. The plan also lacks data suggesting how many schools might be identified, and does not clearly describe how it will identify schools needing additional targeted support because a subgroup of students is performing similarly to students in schools that are among the bottom five percent in the state.

Supporting Schools: Are the state’s planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

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South Dakota’s approach to supporting its lowest-performing schools lacks specifics and is less comprehensive compared to other parts of the plan. While the state will make the required 7 percent Title I set-aside for school improvement available to districts with identified schools, it is unclear how these funds will be allocated. In addition, it is also unclear if and how South Dakota intends to provide direct student services using the optional 3 percent Title I set-aside, which could provide an additional opportunity for the state to help improve student outcomes in its identified schools.

Further, many of the state’s planned interventions lack detail. The plan does not include clear examples of evidence-based interventions, nor how the state will support districts in selecting interventions tailored to schools’ needs. The state also does not define what interventions will be required if schools fail to improve and “more rigorous” steps are needed—instead offering a few suggestions for steps that may be taken, like offering high-quality CTE programs in high schools.

South Dakota is working with the American Institutes for Research to identify important components of a needs analysis, and the plan emphasizes supporting schools in analyzing data to identify areas that need improvement as well as to monitor implementation. But there are few details regarding how the needs assessment will be used to develop and approve a rigorous school improvement plan that includes evidence-based practices and includes

meaningful community engagement. The plan does specify that comprehensive support schools will be paired with school support teams, and districts with two or more comprehensive and/or targeted support schools may be partnered with a technical advisor. The plan does not say much about the qualifications of the people in these roles, however, and provides only minimal information about what they will do.

Exiting Improvement Status: Are the state’s criteria for schools to exit comprehensive and targeted support status sufficient to demonstrate sustained improvements? Why or why not?

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South Dakota’s exit criteria go beyond exceeding the criteria that led to a school’s original identification and also expect overall progress. However, because the amount of overall progress needed is unspecified, it is difficult to determine whether South Dakota will require sustained school improvement to exit.

A school in comprehensive support will need to earn an SPI score outside the bottom 5 percent of schools or improve its graduation rate above 67 percent within four years, as well as demonstrate a positive trajectory on the state’s accountability indicators. In addition, the school must improve on indicators of highest need, as identified by its needs assessment. These criteria are similar to the exit criteria for targeted support schools (which span two years), except that the determination will be based on the low-performing subgroup and that sustained performance of the school’s gap group on all indicators is required. Both sets of criteria could be further strengthened by clarifying the specific benchmarks that are sufficient to denote a “positive” trajectory, and how multiple indicators are considered in this decision, to ensure gains can be sustained.

Continuous Improvement: Has the state outlined a clear plan to learn from its implementation efforts and modify its actions accordingly, including through continued consultation and engagement of key stakeholders? If not, what steps could the state take to do so?

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South Dakota has articulated a number of places where it either plans to monitor implementation and make changes if needed (such as its long-term goals), or where it knows additional work is needed. For example, the state plans to pilot school quality indicators for elementary and middle schools beyond chronic absenteeism and possibly include them in the SPI after the 2018-19 school year, based on feedback received from stakeholders on the importance of measuring student access to safe and healthy schools and a well-rounded education. This suggests a commitment to continuous improvement of the SPI. It would be helpful for the state to continue

convening its four ESSA workgroups (Accountability, School Improvement, English Learners, and Effective Educators), or another overarching stakeholder group, over time to provide feedback and help the state make these and other decisions on ESSA implementation.

The state also clearly engaged stakeholders in the development of the plan and appears committed to continuing to seek their input—in particular, to improve consultation with tribal communities. With nine federally recognized tribes and over 15 percent of the state’s students classified as Native American, this is a critical constituency, particularly given South Dakota’s recognition that improving outcomes for these students will be essential for the state to meet its strategic goals. While the state held four meetings with tribal groups in developing its plan, South Dakota admits that some tribes felt this consultation was not meaningful or timely. To improve engagement, the state is holding another convening with tribes in the fall of 2017 to adopt a formal consultation protocol, including regular meetings and opportunities for collaboration, and will require training for districts on its use. These efforts should be monitored by other states with significant tribal populations as a possible model.