STATE PLAN
PEER REVIEW CRITERIA
Peer Review Notes Template

STATE: South Dakota

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	SD DOE does not seek the 8th grade math exception. P9 Smarter-Balanced Assessment Consortium end of year tests in grades 3-8 and 11.
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	

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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).

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	Aside from native languages (oral languages, and thus not amenable to development of valid and reliable assessments), SD DOE identifies five commonly spoken languages other than English; none of these are spoken to a significant extent based on SD DOE's definition (5% of the student population). Among these languages Spanish is the most common language (spoken by approximately 1% of the student population).
	SD DOE did not include the state's most populous language other than English, Spanish, in its definition as required by statute.
	SD DOE's definition of languages present to a significant extent cites a statewide analysis; there is no evidence SD DOE makes additional supports available in districts or grades where more than five percent of students speak a common language other than English. P11
	SD DOE's determination of languages present to a significant extent does not take special consideration of students' birth country, Native American status, or migratory status.
	The English learner population comprised 3.49 percent of the total student population (4,563 of 130,396) in 2016-17. P10
Strengths	SD DOE provides a brief but sound explanation of the role of native languages in the state and provides a suitable rationale for the absence of assessments in these languages.
	Full consideration has been given to the state's population.

Weaknesses	SD DOE does not identify the State's most populous language in its definition.

SD DOE notes that nearly 15 percent of students are Native American and many speak indigenous languages of their region. However, the State does not discuss whether Native American students tend to enroll in school with low rates of English proficiency or if the lack of proficiency is a deterrent to student success. Given that the fourth pillar of SD DOE's vision that all students are college, career and life ready is increasing the academic success of Native American students (page 6) this could be important contextual information to understand regarding the State's ESSA plan.

SD DOE does not delineate the dominant languages by district or by grade spans. Although less than five percent of students may share a dominant language other than English statewide, select districts of grades may enroll higher proportions of students who could benefit from language accommodations. P10 |
| *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* | SD DOE must identify the State's most populous language in its definition.

While SD DOE has most populous language statewide covered, it must describe how they considered the dominant languages by district and grade span. |

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	SD DOE state assessments are available in English only for all state assessments except for Smarter-Balanced Math which is available in Spanish for all grades, 3-8 and 11. P11

SD DOE provides additional supports and accommodations for English Learners on other assessments such as read aloud, translated test directions, embedded glossaries, bilingual dictionaries, and all other universal tools, designated supports, and as appropriate, accommodations available within the assessment platforms, but languages were not specified for which these additional supports are provided. P11 |
| *Strengths* | SD DOE has mechanisms in place to assist Spanish speaking English learners. Additional supports and accommodations are available for English Learners on other assessments such as read aloud, translated test directions, embedded glossaries, bilingual dictionaries, and all other universal tools, designated supports, and as appropriate, accommodations available within the assessment platforms, but languages were not specified for which these additional supports are provided. P11 |

Weaknesses	The plan lacked a definition of "recently arrived"; the implication is that only new immigrants, and not children whose primary home language is Spanish, would be eligible. SD DOE should specify which languages are supported with read aloud, translated test directions, embedded glossaries, bilingual dictionaries, and all other universal tools, designated supports, and accommodations available within the assessment platforms.
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	SD DOE states no assessments are needed. P11 SD DOE is committed to continuing to provide language supports and accommodations and to monitor this area. P12 SD DOE provides an instructional rationale for why additional assessments are not needed citing daily instructional activity is provided in English, and an empirical rationale, disparate nature of the EL population and accompanying N sizes present challenges to validity and reliability, for not developing additional language assessment translations. P11-12
Strengths	After consulting with stakeholders including experts in English learner instruction, the State has determined that additional assessments on other languages are not necessary. SD DOE has multiple mechanisms in place to assist English learners (such as read aloud, translated test directions, embedded glossaries, bilingual dictionaries, and all other universal tools, designated supports, and as appropriate, accommodations available within the assessment platforms); but does not specify for which languages they are available. SD DOE has provided an instructional rationale for these translations to demonstrate alignment with daily instructional activity and accommodations.
Weaknesses	
Did the SEA meet	☒ Yes (4 peer reviewer(s))

all requirements?	☐ 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	SD DOE provides a reasonable justification for not developing additional assessments in language(s) other than English at this time. SD DOE consulted with appropriate stakeholders in establishing policies related to ELs. Rather than developing assessments in languages other than English, SD DOE provides supports and accommodations for ELs who have had sufficient formal education to read their native language such as text-to-speech, read aloud, translated test directions, embedded glossaries, and bilingual dictionaries. SD DOE consulted with a variety of stakeholders including the EL workgroup comprised of EL teachers, consultants, and high education representatives as well as tribal consultation and brought the issue before the Technical Advisory Committee. P12
Strengths	SD DOE sought input from their Technical Advisory Committee for assessments on this matter. SD DOE references (and includes as Appendix D) a report issued by Smarter Balanced in 2017 ("Assessing Students in Their Home Language") that informed their decisions regarding assessment practices for ELs.

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	SD DOE lists the major federally recognized racial and ethnic subgroups upon which they will report and base accountability decisions. These include White/Caucasian; Hispanic/Latino; Black/African American; American Indian/Alaska Native; Hawaiian/Pacific Islander; Asian; Two or More Races. P12 SD DOE also specifies it will include students with disabilities, English learners, and economically disadvantaged. P12 SD DOE will report, for informational purposes only, on Homeless, Foster, and Military-Connected students as well as gender. P12
Strengths	Groups are specifically named.
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.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	SD DOE will include additional groups referred to as Gap and Nongap. P12.

The "Gap Group" is a combined group that includes students in the following categories: Hispanic/Latino, Black/African American, American Indian/Alaska Native, Hawaiian/Pacific Islander, Asian, two or more races, students with disabilities, English learners, and economically disadvantaged. The State will compare the performance of this Gap Group to a Nongap group that includes students in the following categories: White/Caucasian, Asian, and two or more races.

The Gap group was conceived to increase transparency and increase accountability for students. An additional 1,052 subgroups are now accounted for in South Dakota via the Gap group. P12

The Gap group was created by analyzing the three-year achievement of each group compared to All students. Groups with average achievement above All students are in the Nongap group and groups below are in the Gap group. This identification is analyzed every five years to make Gap/Nongap identifications. P12-13

A school level example illustrates the inclusion of groups with fewer than 10 students into accountability with the use of the Gap/Nongap groups. P13 |
| *Strengths* | SD DOE will report data by gender (important given that there has been a decades-long gap documented in the performance of boys and girls in literacy learning that is evident in elementary grades and continues to grow during middle and high school).

SD DOE has also implemented an innovative approach to subgroups to increase transparency, by assigning students to "gap group" or non-gap group status. By so doing, underperformance by students comprising a group with an n less than 10 would no longer be masked.

SD DOE will continue to report on all subgroups with an n size of 10 or more, in addition to the Gap and Nongap subgroups. P14

SD DOE has presented a case for why the combined subgroup approach is in the best interest of the State and its vulnerable students. The State provided evidence that given the number of small schools across the State and several small subgroups (such as English learners), combining subgroups will allow significantly more schools to be identified for intervention than individual subgroups.

The Gap group includes more students in the accountability system as clearly articulated with school level examples. P13 |
| *Weaknesses* | SD DOE uses the lowest performing quartile for the Other Academic Indicator for schools other than high schools. However, SD DOE does not define this as a separate subgroup in this section. P 27.

SD DOE should define the lowest performing quartile used in the Other |

	Academic Indicator for schools other than high 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.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	N/A: SD DOE is applying the exception under ESEA section 1111(b)(3)(A)(i) to a recently arrived English learner. P14 Recently arrived ELs in South Dakota will be excluded from one administration of the ELA state assessment and will exclude results on any of the assessments for the first year of the English learner's enrollment for the purposes of the state determined school accountability.
Strengths	
Weaknesses	SD DOE will not have baseline data for ELs on the ELA state assessment and therefore will not be able to include these students in learning gains, only achievement, in the second year in the US. Learning gains will not be included until the EL's third year in the US.
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	SD DOE has selected a minimum N-size of 10 students for accountability determinations (and reporting) of all students, each subgroup, and the Gap/Nongap groups. P14 The State provided a detailed analysis comparing an N-size of 10 to an N-size of 20 documenting 650 more schools would be included in the system with an N-size of 10. Furthermore, the State has used an N size of 10 for several years in its accountability and reporting systems so it is familiar to stakeholders including educators and parents. A minimum N size of 10 should uphold the spirit of transparency and accountability. Indicators that use multiple years of data (Student Achievement and English Language Proficiency) will require 10 students over the multiple years, not 10 students each year. P14
Strengths	SD DOE elaborates by noting that for indicators that aggregate multiple years' data (Student Achievement and EL Proficiency), the N size of 10 will apply over the years used for those indicators rather than for each individual year. SD DOE is using the same minimum N-size for all students and each student group. SD DOE provides a state level analysis demonstrating the inclusiveness of 10 versus 20 students as the minimum N-size. P15
Weaknesses	
Did the SEA meet all requirements?	☒ Yes (4peer 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	The statistical soundness of SD DOE's selected minimum N-size of 10 is rationalized through discussions with Accountability Work Group members, SD DOE's Technical Advisory Committee, SD DOE's Parent Advisory Council, and by utilizing the recent Institute of Education Sciences Report "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information." P15 SD DOE has previously used 10 as the minimum N citing a continued balance between inclusion and stability. P15 SD DOE will review three years of data for accountability determinations for schools that fall under the minimum N-size of 10 in a single year. P15
Strengths	SD DOE cites stakeholder input and the best practices established by the Institute of Education Sciences congressionally mandated report "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information," published in January 2017 to guide and support the decision process in selecting the minimum N-size of 10. P15 SD DOE provided context from their own data analysis for the difference in student inclusion for a minimum N-size of 10 and 20. P15 The state approach is strengthened by the small school audit process.
Weaknesses	SD DOE should provide detail on the statistical soundness of the N-size of 10 as it relates to the accountability indicators.
Did the SEA meet all requirements?	☒ Yes (4 peer reviewer(s)) ☐ No (# peer reviewer(s))
If no, describe the specific information or clarification that	

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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.

an SEA must provide to fully meet this requirement	

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

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

	Peer Response
Peer Analysis	SD DOE provides a general description of how it determined minimum N size based on past practice and the approach taken by other states. Research, stakeholder discussions and prior use rationale was provided for statistical soundness of the minimum N size. SD DOE also brought together the Accountability Work Group comprised of school administrators, teachers, and other stakeholders with varied backgrounds and provided the recommendation of 10 to the state. SD DOE also stated discussions at the English Learner Work Group meetings, Parent Advisory Council meetings, and ongoing discussions at Technical Advisory Committee meetings. P15 SD DOE provides impact data to support the selection of this N-size of 10 vs 20 from the perspective of inclusion in the plan narrative. However, detail on the statistical soundness of the N-size of 10 as it relates to the accountability indicators was not provided. Sharing results of the reference analysis for reliability and representativeness would help confirm the minimum N size of 10 is the best decision not just for inclusion, but also for validity and reliability. P15
Strengths	The State engaged stakeholders through the Accountability Work Group which included school administrators and teachers. In addition, the State sought input from the English Learner Workgroup and Parent Advisory Committee. The State has reassessed the decision to use an N-size of 10 through its Technical Advisory committee. The minimum N-size is low enough to be inclusive and not personally identifiable.
Weaknesses	While the SD DOE engaged stakeholders, the narrative does not provide detail on the statistical soundness of the N-size of 10 as it relates to the accountability indicators for stakeholders to consider.
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	SD DOE provides a brief but adequate explanation of how it ensures that student information is protected in the course of reporting accountability information. The n size they use has been demonstrated to be appropriate and SD DOE uses such techniques as suppression of small group outcomes, complementary group outcomes, and small category outcomes, to protect against disclosure of an individual student's information/outcomes. P16 SD DOE consulted "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information" for additional guidance. SD DOE cites research and [prior] peer review as confirming the effectiveness in complying with FERPA. P16
Strengths	SD DOE consulted "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information" for additional guidance. The State used a peer review process to ensure the N-size of 10 complied with FERPA rules.
Weaknesses	SD DOE does not provide detail on how it will employ the rules of suppression of small group outcomes, suppression of complementary group outcomes, and suppression of small category outcomes.
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	

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[3] See footnote 5 above for further guidance.

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	N/A: SD DOE proposes a minimum N-size of 10 for reporting, the same as the accountability minimum N-size. P14
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: 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	SD DOE should clarify whether it is still reevaluating their long – and short-term goals at the time of the plan submission. If the goals are being reevaluated, the process should be detailed, a rationale provided, and final goals determined before the plan is approved. P16 SD DOE identified long-term academic achievement goals for ELA and math as 100% of students attaining proficiency on the state assessments by 2030-31, 13 years after the entering 2017 fall Kindergarten cohort is ready to leave the K-12 system. P16

	The narrative outlines additional goals of 100% of 3rd graders demonstrating proficiency on ELA, 100% of 8th graders demonstrating proficiency on math, and no achievement gaps for Native Americans. These goals will be met if the long-term goals of 100% proficient are met for all students in 2030-31 so it is unclear how these specific goals factor into the plan. P17
	Appendix A shows the baseline data for 2016-17 and the long-term academic achievement goals for ELA and math. The long-term goals are the same for each subgroup and have the same multi-year timeline culminating in 2030-31. P74-75
	It is unclear from the plan narrative and chart in Appendix A which grades are included in the long-term goals. It is inferred that the goals include statewide performance for all grade 3-8 and 11 in aggregate, but this should be specified in the narrative and Appendix A.
	SD DOE does not specify upon which assessment(s) the long-term goals are based.
	Long-term academic achievement goals seem ambitious based on the charts in Appendix A.
Strengths	The State has set the same timeline for all students and subgroups to meet the 100 percent goal.
	Long-term academic achievement goals in terms of percent proficient on ELA and math state assessments are easily understood.
	ELA and math are computed separately.
Weaknesses	It is unclear if SD DOE is reevaluating its long- and short-term goals at the time of this plan submission.
	The State appears to have stakeholder support in setting its aspirational goals at 100%. The goals appear more ambitious for some subgroups than for others. Currently 52.7 percent of all students are proficient in English language arts and 46.34 percent in mathematics. Subgroups including Native Americans, students with disabilities, and English learners have a much steeper climb then many of their peers. For example, in English language arts, White students would need to increase 37 percentage points by 2031 compared to 81 percentage points for students with disabilities and 78 percentage points for Native Americans (page 74).
	It is unclear from the plan narrative and chart in Appendix A which grades are included in the long-term goals. Long-term academic achievement goals seem ambitious based on the charts in Appendix A, and possibly too ambitious given the previous reality of No Child Left Behind.
Did the SEA meet all requirements?	☐ Yes (# peer reviewer(s)) ☒ No (4 peer reviewer(s))
If no, describe the specific information or clarification that	SD DOE must clarify whether still reevaluating their long – and short-term goals at the time of the plan submission. If the goals are being reevaluated, the process should be detailed, a rationale provided, and final goals determined

an SEA must provide to fully meet this requirement	before the plan is approved.

SD DOE should confirm what grades are tested and included in the accountability system.

SD DOE should provide a timeline and explanation of how the long-term academic achievement goals will be reviewed and revised in 2030-31.

SD DOE should provide a year to accompany the Long-Term Goal header in the charts and the grades that are included for these goals in the Appendix A. P74

SD DOE should explain how the additional goals of 100% of 3rd graders demonstrating proficiency on ELA, 100% of 8th graders demonstrating proficiency on math, and no achievement gaps for Native Americans factor into the plan and work in conjunction with the long-term goals in Appendix A.

SD DOE should explain how the long-term academic achievement goal, which is very ambitious at 100% proficient in 2030-31, will promote student achievement improvement given the previous reality of No Child Left Behind. |

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 State has provided interim measures for all students and all subgroups (page 74).

SD DOE sets five-year interim goals (2022-23) based on the percent proficient at the 50th percentile and the 10-year interim goals (2027-28) based on the 75th percentile of All students on the 2017 state assessments. Interim academic achievement goals for each group and subject are provided in Appendix A. P17

Based on the charts in Appendix A, interim goal increases at five years, differ by subgroup and subjects ranging from 1.74 for All students and 37.89 for ELs in ELA and in Math from -0.45 for Asian and 29.13 for Native Americans. The 10-year goals generally require less improvement for each subgroup in each subject. P74-75

Setting interim goals lower than the baseline is not ambitious. Given the plan narrative for groups/schools performing above the 50th percentile, as is the Asian group in Math, the five-year interim goal should be set at the next stepping stone. P17, P74

Most concerning is the expected improvement to reach the long-term goal of 100% proficient in 2030-31, only three years after the 10-year interim goal |

	where increases average 33.6 percentage points in ELA and 43 percentage point in Math. P74-75

SD DOE explains how interim progress academic achievement goals were determined for all students and each subgroup or for each year but may want to reconsider the approach to even out the required improvement over the intervening years to not backload the improvement expectations. |
| *Strengths* | Interim academic achievement goals are presented in terms of percent proficient on ELA and math state assessments which is easily understood.

ELA and math are computed separately. |
| *Weaknesses* | SD DOE does not explain why interim goals have greater increases required in the last years to the long-term goal.

SD DOE should reconsider interim goal expectations to even out improvement expectations over the intervening years.

SD DOE should reset the five-year interim goal for the Asian group in Math at the next stepping stone per narrative explanation. **P17**

SD DOE should provide years to accompany the headers in the charts in Appendix A. **P74-75** |
| *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	SD DOE requires greater improvement for subgroups that are further behind. P74-75

Given the simplicity of the calculation, it is likely that significant progress in closing statewide proficiency gaps will occur because the measure is transparent and annually measured.

SD DOE provides baseline proficiency rates which show the extent or the achievement gaps and which subgroups require greater improvements to close proficiency gaps. |

	SD DOE has set a lower interim goal for the Asian group in Math; this is not an appropriate way to close statewide proficiency gaps. SD DOE should reset this interim goal based on the explanation of setting interim goals in the plan narrative. P17 With goals and measurements of interim progress the same for all groups, proficiency gaps would close in 5 years except for those schools and subgroups exceeding the 50th percentile. A similar situation occurs at 10 years, and all gaps are closed in 13 years.
Strengths	All students and all subgroups are included. Gaps are easily measured and understood using grade level proficiency rates. ELA and math are measured separately.
Weaknesses	SD DOE should reset the five-year interim goal for the Asian group in Math at the next stepping stone per narrative explanation. **P17**
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: 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	SD DOE identified long-term graduation rate goal as 100% of students graduating in four-years by 2030-31, 13 years after the entering 2017 fall Kindergarten cohort is ready to leave the K-12 system. P18 Appendix A shows the baseline data for 2016-17 and the long-term graduation rate goals for the four-year cohort. The long-term goals are the same for each subgroup and have the same multi-year timeline culminating in 2030-31. P75

	Long-term graduation rate goals are ambitious based on the narrative and chart in Appendix A.
Strengths	The State has set the same timeline for all students and subgroups to meet the 100 percent goal that every student will graduate in four years. Long-term goals are set to result in no achievement gap in graduation rate for the state's Native American population. Long-term graduation rate goals in terms of percent graduating in four-years are easily understood.
Weaknesses	The State appears to have stakeholder support in setting aspirational goals of 100% graduating in 4 years. However goals are more ambitious for some subgroups than for others. Currently 83.74 percent of all students graduate. Subgroups including Native Americans, students with disabilities, and English learners have a much steeper climb then many of their peers. For example, the graduation rate is 50 percent for Native Americans and 59.5 percent for English learners, and 60.42 percent for students with disabilities. (P 74). SD DOE should provide a timeline and explanation of how the long-term graduation rate goals will be reviewed and revised in 2030-31. SD DOE should provide a year to accompany the Long-Term Goal header on the chart in the Appendix A. P74 SD DOE should explain how the long-term graduation rate goal of 100% in 2030-31 will promote student achievement improvement given the previous reality of No Child Left Behind.
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	N/A: SD DOE will not use an extended rate. P18
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	SD DOE sets five-year interim goals (2022-23) based on the graduation rate at the 50th percentile and the 10-year interim goals (2027-28) based on the 75th percentile of All students for the 2016-2017 four-year graduation cohort. Interim graduation rate goals for each group and subject are provided in Appendix A. P19 Based on the charts in Appendix A, interim goal increases at five years, differ by subgroup and subjects ranging from 1.09 for Nongap students and 42.3 for Native Americans. The 10-year goals generally require considerably less improvement for each subgroup averaging 4 percentage points. P75 The expected improvement to reach the long-term goal of 100% graduation rate in 2030-31, only three years after the 10-year interim goal, averages 3.7 percentage points only slightly less that the 4 percentage points required for the previous five-year period. P75 SD DOE explains how interim progress academic achievement goals were determined for all students and each subgroup for each interim but may want to reconsider the approach to even out the required improvement over the intervening years to not frontloaded for the improvement expectations.
Strengths	Interim graduation rate goals are presented in terms of percent graduating in four-years which is easily understood.
Weaknesses	The gains between baseline and Interim Target Year 5 appear far more ambitious for some subgroups (particularly for Native Americans, English

	learners, and students with disabilities).
	SD DOE does not explain why interim goals have greater increases required in the first five years than the last eight years to achieve the long-term goal.
	SD DOE should provide years to accompany the headers in the charts in Appendix A. P75
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	SD DOE's goals are aspirational. The data presented on page 75 clearly show the progress subgroups will need to make toward the 2031 goal with 5- and 10-year milestones. From the baseline to the 5 year milestone the Nongap group will need to increase 1.09 percentage points compared to 22.46 percentage points for the Gap group.
	SD DOE requires greater improvement for subgroups that are further behind. P75
	Given the simplicity of the calculation, it is likely that significant progress in closing statewide graduation rate gaps will occur because the measure is transparent and annually measured.
	SD DOE provides baseline graduation rates which show the extent or the achievement gaps and which subgroups require greater improvements to close proficiency gaps.
	By using the same interim measures of progress, gaps would close substantially at the 5 year mark other than for schools and subgroups ahead of schedule.
Strengths	All students and all subgroups are represented in the data provided.
	Gaps are easily measured and understood using a rate that captures the percent graduating in four-years.

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.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	SD DOE is using WIDA ACCESS 2.0 to measure EL language proficiency and progress. The long-term ELP goal is to have 100% of students on track to exit EL status on time by 2030-31. P21 The baseline provided for all ELs meeting their target in 2017 was 0%; SD DOE will re-evaluate the data following the receipt of the 2017-18 results. P75 SD DOE explains that individual student growth targets will be set based on the initial composite score because an analysis of EL students in SD DOE demonstrated that initial score, not age/grade, is the strongest indicator of time to exit EL status. P20 SD DOE provides an explanation of how individual student progress on ACCESS 2.0 is measured based on initial score and time to exit by achieving the 5.0 proficiency composite score. P21 SD DOE measures the goals by the percent of ELs meeting the individual student growth target or exiting and appears to be ambitious. P21 SD DOE developed an individual growth model in collaboration with CCSSO and WIDA, and with the support of SD DOE's English Learner Work Group. Growth will be measured utilizing an entry to target approach based on performance on the first English language proficiency assessment students take in South Dakota.

	Five years is the maximum timeframe to exit EL status. SD DOE will set interim targets based on ACCESS 2.0 composite scores that expect equally spaced growth but allow growth to be cumulative as long as students are making progress.
Strengths	The State methodically reviewed English learner data to determine factors related to exit status. SD DOE initially assumed that age/grade level would have a stronger relationship on exit status than initial proficiency. However, deep analysis of the data found that initial proficiency status far outweighed age/grade. SD DOE will revisit long-term goals when 2017-18 data are available to ensure they are ambitious and achievable.
Weaknesses	SD DOE does not explain what information will be considered once 2017-18 data are available to revise the goals. SD DOE should provide a plan and timeline on when it will have baseline data for this indicator and revised and confirm when this indicator will be included in the accountability system The table on page 20 shows that a student with the lowest proficiency as measured at 1.0 to 1.9 on the ACCESS 2.0 assessment is afforded 5 years to attain proficiency. A student entering 10th grade at this level may not reach proficiency before graduation. The plan could be strengthened with an explanation of how this might impact achievement of long-term goals for ELs. SD DOE should explain what information will be considered once the 2017-18 data are available to revise the goals. SD DOE should include an explanation of how entering EL status in high school as a minimally proficient student might impact achievement of long-term goals.
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	Although baseline data is not yet available due to SD DOE's transition to new English language assessment, interim targets have been set for five and ten years based on a trajectory towards the long-term goal of all students being on track to exit EL status on time by the 2030-31 school year.

	SD DOE sets interim goals of 50% at five-years (2022-23) and 75% at 10-years (2027-28) using WIDA ACCESS 2.0 to achieve the long-term ELP of 100% of students on track to exiting EL status by 2030-31. P75
	SD DOE provides measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency in Appendix A. P75
Strengths	SD DOE will revisit long-term goals when 2017-18 data are available to ensure they are ambitious and achievable and this will presumably extend to the interim goals.
	SD DOE is working with WIDA and CCSSO to assist with developing goals and individual student targets.
Weaknesses	SD DOE should commit to re-evaluating the interim goals, as it will with the long-term goals, once 2017-18 data are 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.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	SD DOE proposes to use a School Performance Index (SPI) to measure the academic achievement. ELA and math indices will be computed separately

	using the state assessment for grades 3-8 and 11 in ELA and math, using a three-year rolling average. SD DOE has four performance levels. Schools will earn points up to 40 points (20 for each subject, reading and math) for students scoring at each level: Level 1 = 0.25, Level 2 = 0.5; Level 3 = 1.0; Level 4 = 1.25. Points earned will be totaled and divided by the number of students tested or 95% of students, whichever is larger. P22-24 SD DOE describes the use of the Gap and Nongap group in the SPI. The indicator will be computed separately for each group and then aggregated using a weighted average. P26 SD DOE does not describe how the three-year rolling average will be computed for the academic achievement indicator. The indicator is based on the long-term goals of achieving 100% at grade-level proficiency by 2030-31, so long as the current year measures of proficiency are explicitly stated on the report card in addition to the academic achievement index indicator. P24 SD DOE also cites performance will be reported for all groups, but does not specify if performance is the same as the SPI academic achievement indicator. P24 The 95 percent tested requirement will be applied to the indicator for all students and the Gap and Nongap groups by using the number of tested students or 95 percent of students that should be tested, as the denominator, whichever is greater. Nontested students above the allowable five percent will earn zero points in the numerator and are included in the denominator of the academic achievement indicator. P24
Strengths	The State provides a scoring penalty if a school or subgroup less than 95 percent of students are not assessed (see step 6, page 25). If a school or subgroup does not meet this threshold, the State assigns a zero in this step which may lower a schools overall score. SD DOE's method for accounting for 95% tested by awarding zero points in the numerator strongly incentivizes schools to test ever student since just testing the student will earn the school at least 0.25 points. This may be trying to solve a problem SD DOE does not have given the very high participation rates. Given the large number of small schools and subgroups the State will average three years of data to increase stability with n-sizes. SD DOE is calculating the SPI consistently across schools. ELA and math indicators will be calculated and reported separately for each subgroup and group. SD DOE provides a detailed school level example of how to calculate the SPI.
Weaknesses	SD DOE's calculation of the achievement index is complicated and entails 14 steps. However, the State provided a step-by-step guide at how it arrived at the final number of SPI points for the achievement indicator. Should the State

go forward with this model, this would be helpful guidance to the public so they can see how the indicator is constructed and validate the results.

In Step 6 the state discusses participation for all subgroups. It is not clear if the State means each individual subgroup or the Gap/Nongap subgroups.

There is concern that the weighting of the Gap and Nongap students could greatly skew results in favor of the Nongap population. For example, looking at the chart on page 26, the school earned 14.62 points out of 20, but 80 percent of the score is accrued from the Nongap population. This is due both the difference in size between the two groups and their performance levels.

It is not clear how the index relates to the State's overall goal on 100 percent proficiency by 2031.

SD DOE awards points to every student, even students scoring at the lowest performance level.

SD DOE does not describe how the three-year rolling average will be computed for the academic achievement indicator.

Using the SPI, rather than a percent proficient as is done with the long-term goals, adds complexity to the academic achievement indicator and how to communicate results that are understandable to parents, community, and the public for the student mastery of standards.

SD DOE should clarify how the SPI relates to the State's long-term academic achievement goals.

Did the SEA meet all requirements?	☒ Yes (2 peer reviewer(s))
	☒ No (# 2peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	SD DOE must describe how the three-year rolling average will be computed for the academic achievement indicator. SD DOE should also clarify that current year data will be used as part of that three-year rolling average.

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	SD DOE proposes to use a Student Growth Percentiles (SGP) for grades 4-8 in all elementary and middle schools as the other academic indicator for ELA and math for All students and the lowest performing quartile of students for a total of 40 possible points. P26-27
	SD DOE will include in the numerator students who maintain proficiency, students who will achieve proficiency in three years and students making growth at the 70th percentile or higher. For the All Students calculation the denominator will include students with scores of the same test for two consecutive years and for the lowest quartile the denominator will be the students in the school with the lowest achievement scores from the prior year. P27
	Since students are compared to their peers, in this case other non-proficient students, inclusion in the numerator may not be warranted. This outcome may not be meaningful for the student and may not be as rigorous as maintaining proficiency or on track to achieve proficiency in three years. This inclusion means that 30 percent of non-proficient students who will not necessarily meet proficiency within three years will be earning growth credit for the school. This results in questions of validity as an academic indicator.
	SD DOE will report on all students and each subgroup. P27
	The state provides a detailed explanation of the uniform procedures used to calculate the growth indicator for all schools that do not have 12th grade. The state does not mention averaging for this indicator.
Strengths	SD DOE's SGP focuses on maintaining proficiency and reaching proficiency in three years. However, more detail on the impact of the calculation and empirical evidence that supports maintaining and reaching would bolster support for this indicator as measuring meaningful outcomes for students and demonstrate validity.
Weaknesses	The Student Growth Percentile calculation is complex and may result in schools earning points for outcomes that are not meaningful to students.
	The narrative provided limited data, research, or methods to make a case for

	the Student Growth Percentiles to be a valid and reliable other academic indicator or if the Student Growth Percentiles differentiates across schools as no data is provided on the impact of the calculation.
Did the SEA meet all requirements?	☒ Yes (4peer 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	SD DOE proposes to use the four-year adjusted cohort graduation rate as the indicator for all high schools: the number of graduates divided by the adjusted cohort. P29 SD DOE commits to reporting disaggregated graduation rate indicator data for all students and groups, as well as the Gap and Nongap groups, and at the state, district, and school levels. P29 The narrative does not explicitly address whether the indicator will be lagged. However, the example calculation is for 2017-18. P29 SD DOE does not have alternate academic achievement standards and does not award a state-defined alternate diploma. P 28

	High schools can earn up to 12.5 points in the SPI for high school completion.
Strengths	The State is using the standard four-year adjusted cohort rate which is widely used by states, valid and reliable, and upon which long-term goals were set.
Weaknesses	SD DOE should clarify if the graduation rate indicator will be lagged.
Did the SEA meet all requirements?	☒ Yes (4peer 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	SD DOE proposes to use an English Language Proficiency index for the English Language Proficiency Indicator based on the state definition of participation, progress and proficiency on ACCESS 2.0. Schools will earn points for students with prior ACCESS 2.0 scores: 0.25 points for not growing or regressing, 0.5 points for growth but not meeting exit on time trajectories, 1.0 points for first-identified students tested or students on track to exit on time, and 1.25 for students exiting early. Schools earn one point for initially identified ELs taking ACCESS 2.0 for the first time, this results in full credit for participating in ACCESS 2.0. Schools have up to five years to ensure students are English language proficient, 5.0 composite score, depending on initial composite scale score, 1.0-6.0. P29-30 The calculation is the same across all schools and districts. SD DOE will be combining three years of data for the indicator. If a school does not have at least 10 ELs over a three year period, district level data will substitute for the indicator. If the district does not have at least 10 ELs over the three-year period then the EL points will be redistributed to the other indicators. P31 On-track to exit targets are determined by subtracting the initial year score from the 5.0 proficiency composite and dividing by the number of years, 2-5,

to become EL proficient based on the initial score. Index points are awarded based on the progress towards the target. All students will earn points for the school if they are tested on ACCESS 2.0. There is no negative value assigned in the index for students decreasing in achievement. Schools are awarded 0.25 bonus points for student exiting ahead of time, but it is unclear whether this applies only to the exit year. P21, P30

SD DOE uses a criterion based progress measure. But combining it into an index and awarding extensive partial credit to schools for students who do not meet the targets does not provide meaningful information about progress of ELs. Additionally, incentive to move kids toward meeting the targets when partial credit is awarded to all kids and bonus credit is awarded for a student who exceed targets is minimal.

It is assumed that this is the calculation for all schools across the state as it is the only calculation described. It is unclear whether this indicator includes all K-12 students in the calculation or only students in state content assessment grades.

SD DOE provides useful background on their EL population, including the facts that only a few districts have consistent/significant ELs and that the origins/nature of ELs in the student population is quite diverse.

SD DOE has developed an Achieving English Language Proficiency (ELP) indictor that could earn schools up to 10 points in the SPI. However, the State is not clear on how the SPI points relate to proficiency especially with the SD DOE's long-term goal of 100 percent English learner proficiency by 2031.

Strengths	SD DOE uses criterion based growth to measure EL progress.
	SD DOE's EL indicator is based on a well-established assessment.
Weaknesses	SD DOE has developed detailed procedures for holding the maximum number of districts accountable for the growth of their EL students (p. 31). Only in the event that a district had ELs in the three year span being considered, but did not meet an N-size of 10 in those years, will the points for the ELP indicator will be redistributed across indicators but does not explain how. However, assignment of district-level results to schools does not yield a valid measure of school performance.
	SD DOE does not explain how the Achieving English Language Proficiency (ELP) indictor aligns with the State's long-term goal that 100 percent of English learners to reach proficiency by 2031.
	There is concern that schools with students regressing and not meeting growth goals as well as first year participants will be awarded points, even if the students remain far from meeting the State's proficiency standard.
	SD DOE did not address the reliability or validity of the indicator.
	SD DOE does not specify that this indicator will be used for all school or which grades are included in the calculation.

	Bonus points are awarded to schools for students who exceed the targets but no negative values are assigned in the Index for students who regress. SD DOE should consider using a simpler calculation for reporting ELs making progress towards English language proficiency. Minimally, the English Language Proficiency index should not award extensive partial credit to schools for students who do not meet the targets because this partial progress is not meaningful to students who still must make all the progress to become EL proficiency and because the partial credit does not reveal meaningful information about progress of ELs. If maintaining the index, SD DOE should consider awarding negative values in the index for students who regress, to complement the bonus points awarded to schools for students who exceed the targets.
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	SD DOE must specify that this indicator will be used for all schools and which grades are included in the calculation. SD DOE must clarify how this indicator provides meaningful data on the progress English learners are making toward the Level 5 proficiency standard.

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	Elementary and Middle School level-Attendance SD DOE proposes to use student attendance the School Quality and Student Success Indicator in Elementary and Middle schools as the percent of students present at least 90% of enrolled days. P32

SD DOE is committed to find additional, innovative measures of SQSS for Elementary and Middle schools by exploring ideas with stakeholders. P32 SD DOE does not provide data or research to demonstrate how Attendance is meaningful, reliable, valid, and comparable and ensures that they are not systemically biased towards already low performing schools.

SD DOE will report performance on this indicator separately for all students, all subgroups, Gap and Nongap groups, and at the state, district, and school levels. P35

High School level: High School Completion

SD DOE proposes to use two measures for the high schools: one for the School Quality and Student Success Indicator, the High school completion rate, and one as an Other Academic Indicator – High School Level of College and Career Readiness (CCR). SD DOE may only use CCR in the School Quality and Student Success Indicator as an Other Academic Indicator applies only to Elementary and Middle schools. P33-35

The High School Completion rate is the percent of students who graduate with a diploma or high school equivalency divided by those students plus high school dropouts over the last four years. The CCR measure is lagged using graduates as the denominator and awarding one point for students who meet the readiness and progress indicators and one-half point for meeting the readiness or progress indicators. P33-34

This rate will be calculated for every school, district, and the state, and for every subgroup at each of these levels.

High School level: CCR

Beginning on page 33, the State provides information on its College and Career Readiness (CCR) indicator. The State is considering this an Other Academic Achievement Indicator; however, according to statute, this should be addressed under School Quality or Student Success Indicator.

While CCR is comprised of an objective outcome measure, using the denominator of graduates is misleading as to the school's effectiveness in preparing students for CCR. P34

Using all students in the 9th grade cohort provides more transparency than graduates. A school that has a 60 percent graduation rate could have a 90 percent CCR rate sending mixed messages to students, parents, and policymakers about school success.

Readiness indicators are not of equal rigor. Scoring proficient or higher on SBAC is more rigorous than completion of HS remediation for English or math and schools earning credit for these unequal outcomes is not in the best interest of improving student achievement and could result in perverse incentives of discouraging taking ACT or not pushing to do well on SBAC because the school will already earn points for state-approved remediation and

	the student must only satisfy one of the three options for a school to earn credit. The Progress indicators also insight similar concerns about perverse incentives such as grade inflation in dual enrollment and AP courses. P34 Impact data was not provided to demonstrate validity, reliability, or meaningful differentiation of CCR indicators. Each of these indicators can and will be disaggregated for each subgroup. P35
Strengths	Elementary and Middle School level: Attendance SD DOE is committed to working with stakeholders to research other innovative SQSS indicators for future use in elementary and middle schools for inclusion in the accountability system. High School level: High School Completion None High School level: CCR None
Weaknesses	Elementary and Middle School level: Attendance SD DOE did not provide research-based evidence as to how the Attendance will increase student achievement and decrease achievement gaps nor how it will not systemically bias already low performing schools. High School level: High School Completion By including students who graduated in four years in the High School Completion indicator, the four-year cohort graduation appears to be doubly weighted. More detail on the relative impact of four-year versus alternative completion would support the use of both indicators. Both measures earn equal weight in the SPI so there is concern the measures are so highly correlated that they are measuring the same aspects. The indicator provides less valuable information as the state's schools/subgroups near the 100% graduation rate goals. High School level: CCR SD DOE uses the percent of graduates, rather than all students, as the denominator for CCR which will provide misleading information about school success. SD DOE does not provide impact data for the CCR Indicators. Schools will earn credit on the CCR indicator for Readiness outcomes that are not of equal rigor for students.
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	<u>Elementary and Middle School level: Attendance</u> SD DOE must provide research-based evidence as to how the Attendance will increase student achievement and decrease achievement gaps, demonstrate it is a reliable and valid indicator and will not systemically bias already low performing schools. <u>High School level: High School Completion</u> SD DOE must provide a comparison of the four-year graduation rate and the high school completion rate. SD DOE must provide evidence that High School Completion indicator is valid, reliable, and differentiates. For example, SD DOE could provide baseline data to prove the completion indicator provides useful information that cannot be discerned from the grad rates. <u>High School level: CCR</u> SD DOE must move CCR to the School Quality and Student Success Indicator as an Other Academic Indicator applies only to Elementary and Middle schools. **P33-35** SD DOE must provide evidence that the CCR indicator is a valid measure of student readiness for college and career, specifically includes all students has comparable rigor of readiness outcomes, and is reliable and differentiates,

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	SD DOE will differentiate schools based on a 100-point School Performance Index (SPI). Schools are awarded points based on the percentages of points generated for each indicator added together. Elementary and middle schools will have one scale and high schools will have a different scale. P35 Points are awarded for (P37): Academic Achievement: Math, ELA, Max 40 points – 20 points each subject Other Academic Indicator: Growth in Math, ELA for All Students and Lowest Quartile, Max 40 points - 10 points each subject/student combination and Graduation Rate, HS, Max 12.5 points English Language Proficiency: Progress/Proficiency, Max 10 points

	School Quality and Student Success: Max 10 points for Attendance in elementary and middle schools and Max 12.5 points for High School Completion Rate in high schools. The CCR indicator (which is described as an Other Academic Indicator – High School Level not as an SQSS indicator), Max 25 points– clarity is needed if the CCR indicator will be moved to SQSS for compliance. SD DOE provides detail on how each indicator will be computed to understand how the points are generated for the indicator and aggregated on the 100-point scale. The SPI will likely provide for annual meaningful differentiation of schools, but no evidence or data was provided to support this claim. Performance on each indicator will be included in the report card for every school, every district, and statewide. Although the SD DOE does not explicitly note that the accountability system will report on all students and for each subgroup of students, that can be inferred from information contained in previous sections. While implied, the description does not include "on an annual basis" statement for differentiations. SD DOE distinguishes "Schools will earn points based on the all students subgroup; SD DOE will report the performance separately for all students, all subgroups, the Gap and Nongap super subgroups, and at the state, district, and school levels."
Strengths	SD DOE differentiates using a 100-point SPI system aggregating all indicators.
Weaknesses	The State does not provide the performance of subgroups, in several indicators. The data provided on pages 74-76 show considerable variation in performance across subgroups. Excluding the subgroup data from most indicators could weaken differentiation. SD DOE indicates it has two scales in its accountability system—one for elementary and middle schools and another for high schools. In reviewing the ELP indicator, it seems there will be four scales since so few districts have English learners. In districts where there are less than 10 English learners, the ELP points will be redistributed to the other academic indicators. Scales: 1) elementary and middle schools with English learners, 2) elementary and middle schools without English learners, 3) high schools with English learners, and 4) high schools without English learners. SD DOE includes in this section a description of its efforts to review and revamp financial reporting requirements. It is unclear how this will factor into annual meaningful differentiation. Both high school completion and graduation rate measures receive equal weight in the SPI, so there is concern that the measures are so highly correlated that they are measuring the same aspect of high school completion.

	It is not clear how stakeholders will see progress using the SPI. It would be helpful if the State displayed previous years' SPI results so parents, schools, and other stakeholders can see progress or areas of weakness. SD DOE does not provide impact data or other empirical evidence to demonstrate the classification rules annually meaningfully differentiate schools. Applying the system to all subgroups is not clear.
Did the SEA meet all requirements?	☒ Yes (1 peer reviewer(s)) ☒ No (3 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	SD DOE must clarify that determinations are made on an annual basis to comply with statute. SD DOE must provide the points distribution for schools/LEAs without the English learner subgroup. SD DOE must move the CCR indicator to SQSS for compliance. SD DOE must specifically indicate that all subgroups are in the accountability system and evaluations will be annual.

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	SD DOE explains the weighting of the indicators using maximum points allotted under the indicator for aggregations into the 100-point SPI. P37 Points are awarded for (P37): Academic Achievement: Math, ELA, Max 40 points – 20 points each subject Other Academic Indicator: Growth in Math, ELA for All Students and Lowest Quartile, Max 40 points - 10 points each subject/student combination and Graduation Rate, HS, Max 12.5 points English Language Proficiency: Progress/Proficiency, Max 10 points School Quality and Student Success: Max 10 points for Attendance in elementary and middle schools and Max 12.5 points for High School Completion Rate in high schools. The CCR indicator (which is described as an Other Academic Indicator – High School Level not as an SQSS indicator), Max 25 points,– clarity is needed if the CCR indicator will be moved to SQSS

	for compliance.
	SD DOE weights each the Academic Achievement, Other Academic/Graduation Rate, and Progress in Achieving English Language Proficiency substantially. P37
	In aggregate Academic Achievement, Other Academic/Graduation Rate, and Progress in Achieving English Language Proficiency account for 90 percent of the possible points for elementary and middle schools, and 62.5 percent of the points possible, for high schools. An argument can be made that High School Completion is also academic in nature, but measured as part of SQSS. The values for the aggregate indictors are much greater than the SQSS indicator. P37
	SD DOE explains that in the event a school cannot meet the minimum n size of 10 for accountability in a given indicator, points will be redistributed to other indicators, but does not explain how the redistribution will occur. P 37
Strengths	SD DOE places the greatest weight on Academic Achievement and Growth in ELA and Math on state assessments in elementary and middle schools.
	SD DOE places the greatest weight on Academic Achievement in ELA and Math on state assessments and CCR in high schools.
Weaknesses	SD DOE does not provide evidence to demonstrate the classification rules annually meaningfully differentiate schools.
	The CCR indicator is described as an Other Academic Indicator – High School Level, Max 25 points, not an SQSS indicator and must be moved to SQSS for compliance.
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	SD DOE must provide the points distribution for schools/LEAs without English learners.
	SD DOE must move the CCR indicator to SQSS for compliance. This move will impact weights. CCR at 25 points and High School Completion at 12.5 points will result in 37.5 percent of the high school calculation to be based on SQSS indicators and 62.5 percent on the aggregate indicators.
	SD DOE must provide evidence to demonstrate the classification rules annually meaningfully differentiate schools.

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	SD DOE indicates it will use different methods for P-2 schools identifying Feeder/Receiver patterns and assigning the Feeder school the same SPI score as the Receiver school. P38

Small schools will have data aggregated over three years to achieve the minimum N-size to earn an SPI rating. P38

Special audit schools have their performance evaluated by a team with representatives across South Dakota to identify performance trends and whether support is needed at the school. P38

Unique facilities serving behavioral and incarcerated students will not earn an SPI rating; rather, students will be assigned back to their home zoned district for accountability, and included in state accountability. P38

Grade 9/10 only schools and SWD centers were not specifically addressed in this section.

SD DOE does not explain how small school audits will be used for identifying schools. |
| *Strengths* | SD DOE appears to have policies in place to ensure that no student "slips through the cracks" in terms of inclusion as part of the state's accountability system, specifically the small school audit

K-2 schools will be rated based on feeder patterns academic achievement and exceeds expectations scores. |
| *Weaknesses* | Alternative schools, grade 9 only schools, SWD centers, were not addressed in this section.

SD DOE should provide data on the number of schools that would be excluded from the SPI based on small N-sizes.

SD DOE should provide an explanation of how grade 9/10 only schools and SWD centers will be evaluated. |
| *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: 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	SD DOE will identify the lowest performing five percent of Title I schools using the 100-point SPI that includes all indicators by ranking elementary and middle schools from highest to lowest performing and identifying the bottom five percent of Title I schools as CSI. High schools will be ranked separately to identify the lowest five percent. CSI designations will be made for 2018-19 based on 2017-18 SPI. P39
Strengths	SD DOE will identify schools for CSI implementation for 2018-19 based on 2017-18 ratings.
Weaknesses	It is not clear how the inclusion or exclusion of the ELP points would affect the rankings.
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	SD DOE will identify any high schools for CSI if the school fails to graduate one-third of their students based on the four-year adjusted cohort graduation rate. SD DOE will identify high schools for CSI for the 2018-2019 school year based on 2016-17 data. P39
Strengths	SD DOE will use a four-year rate for CSI identification. SD DOE will identify schools for CSI implementation for 2018-19 based on the 2017-18 graduation rate.
Weaknesses	The response is rather cursory.

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	SD DOE will identify schools for CSI because the school did not exit additional targeted support if the school has not met the exit criteria: no longer meets the reason for their identification, demonstrates a positive performance trajectory for the subgroup on which the school was designated, and demonstrates the Gap group has not declined on an indicator over the designation period after four years. The first identification will occur in 2023-24. P39
Strengths	SD DOE will identify schools for TSI additional targeted support for implementation in 2019-20 based on 2018-19 data
Weaknesses	Schools will be low performing for six years before entering this CSI identification. That is an entire generation of elementary students and an entire generation of secondary students. (Data in 2017-18 and 2018-19 demonstrating low performance, TSI identification for 2019-20 through 2022-23, then CSI identification in 2023-24.
Did the SEA meet all requirements?	☒ Yes (1 peer reviewer(s)) ☒ No (3 peer reviewer(s))
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	SD DOE must first clarify the comments in A.4.vi.f and then revisit this section. SD DOE must clarify if CSI not exiting TSI status will be annually identified after the initial identification in 2023-24. SD DOE must clarify what 'no better on any indicator' means for TSI identification. It could be interpreted to mean the group performs better on one indicator and is therefore not identified or the group has performed better on all indicators and therefore is not identified.

	SD DOE must clarify whether the comparisons for performing 'no better' are made to All Students or the respective groups at CSI schools for TSI identification.
	SD DOE must clarify if the list of schools with consistently underperforming subgroups is the list identified in A.4.vi.e, but the schools were not identified for TSI consistently underperforming.

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	SD DOE will identify schools for CSI annually beginning in 2017-18. P39
	SD DOE will identify additional targeted support schools for CSI after four years of identification of TSI initially for the 2023-24 school year and annually from then. P39
Strengths	CSI identification is annual.
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	SD DOE proposes to identify schools for TSI consistently underperforming by reviewing three years of data for the Gap group and the All Students. SD DOE will compare the average performance bound by a 95% confidence interval to determine which schools have the Gap group underperforming All Students on all indicators. TSI consistently underperforming schools will be identified for 2018-19 based on 2017-18 data and annually thereafter. P40
	It is unclear from the narrative if the three years of data used for making TSI

determination will be averaged over three school years or if the Gap group must be below the All Students for three consecutive years. The latter would lead to fewer identifications, especially if the Gap must be lower than All Students on all indicators. P40

The identification language is also permissive, stating that SD DOE may identify the school meeting these criteria for TSI. P40

SD DOE does not explain how the use of confidence intervals will yield greater identification of schools based on subgroup performance especially in small schools. Furthermore, the specific details about how confidence intervals were determined were not provided.

The state describes using a 3 year aggregate of data for each indicator. Only subgroups consistently underperforming on all indicators will meet the criteria. The term "average" is used for the first time in this section. Assuming this is averaging 3 years' data rather than aggregating, the state proposes a 95% confidence interval applied to the average of each indicator for each subgroup and then a comparison to the all students group.

SD DOE does not provide evidence on which schools and how many will be identified. It is based on each indicator rather than all indicators, implying a subgroup would need to be low performing on every indicator rather than a composite score

Strengths	SD DOE will identify schools for TSI implementation for 2018-19 based on 2017-18 ratings.
Weaknesses	The State's method in identifying schools with "consistently underperforming" subgroups lacks clarity. SD DOE has used different subgroup analyses in the SPI indicators. In the academic achievement indicator, the State is comparing performance on Gap/Nongap subgroups. SD DOE will only identify schools with three years of data on all indicators below "all students" averages with a confidence interval of 95%. SD DOE does not specify if the three years of data will be averaged or consecutive. SD DOE's language on identification for schools meeting the TSI criteria is permissive. SD DOE does not provide impact data to demonstrate how many schools would be eligible for TSI identification. SD DOE is already using 3 year aggregates for some annual indicators. Using 3 years of these aggregate numbers actually means 5 years' data will be used. The first reference to averaging implies the performance AND the N would be averaged. Since the use of multiyear of data is to establish better reliability, the process using a 95% confidence interval appears intentionally designed to avoid subgroup identification. Additionally, comparing subgroup performance

	to the "all students" performance is a relative measure.
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	SD DOE must specify if the three years of data used for identification will be averaged or consecutive. SD DOE must clarify if the Gap group must be consistently underperforming on all indicators for TSI identification. SD DOE must change the language on identification for schools meeting the TSI criteria from "permissive" to "require" ensuring SD DOE will identify schools for TSI. SD DOE must provide evidence to demonstrate how many schools would be eligible for TSI identification. SD DOE must provide baseline data and a much more thorough explanation of the process with specific examples. Strongly consider annual interim measures of progress for all indicators that would allow comparing subgroups to a fixed measure as opposed to some other average. Provide simulations using the 95% confidence interval.

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	SD DOE proposes to identify from the list of schools with a consistently underperforming subgroup any school with a subgroup or Gap group performing 'no better on any indicator' than the current year performance of CSI identified schools 'over a period of three years.' Identification for 2019-20 will be based on 2018-19 data and then annually thereafter. P40 SD DOE should explain what 'over a period of three years' means when making comparisons to identify TSI schools. Clarify whether this is the three-year-average, or three three-year averages. Additionally it should explain how the 95% confidence interval is applied, in each year during the three-year period. P40

	SD DOE should clarify if the list of schools with a consistently underperforming subgroup is the list identified in A.4.vi.e, but the schools were not identified for TSI consistently underperforming. Further clarification is need for what 'no better on any indicator' means. It could be interpreted to mean the group performs better on one indicator and is therefore not identified or the group has performed better on all indicators and therefore is not identified. Further clarification is needed on whether the comparisons for performing better are made to All Students or the respective subgroups.
Strengths	
Weaknesses	SD DOE will identify schools for TSI additional targeted support for implementation in 2019-20 based on 2018-19 data. The reference in this entry to "any indicator" and "each indicator" creates ambiguity as to the scope of underperformance required in order to receive additional targeted support. The plan narrative is unclear what 'no better on any indicator' means. It could be interpreted to mean the group performs better on one indicator and is therefore not identified or the group has performed better on all indicators and therefore is not identified. The plan narrative is unclear whether the comparisons for performing better are made to All Students or the respective subgroups. The plan is unclear about what "over a three year period" means. Clarification is needed if this is the three- year-average, or three three-year averages.
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	SD DOE must identify schools for TSI additional targeted support for implementation no later than the beginning of the 2018-19 school year. SD DOE must clarify what 'no better on any indicator' means. It could be interpreted to mean the group performs better on one indicator and is therefore not identified or the group has performed better on all indicators and therefore is not identified. SD DOE must clarify whether the comparisons for performing 'no better' are made to All Students or the respective groups at CSI schools. SD DOE must clarify if the list of schools with consistently underperforming subgroups is the list identified in A.4.vi.e, but the schools were not identified for TSI consistently underperforming.

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	NA: SD DOE does not identify any additional categories of schools. P39
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	Participation in state testing can, and will, be disaggregated for each group. P41 SD DOE has an administrative rule that allows schools with fewer than 40 students to not test up to two students and still be considered to meet the participation bar. P41 This allowance means schools with 10 to 39 students could have participation rates of 80 to 94.87 percent to meet the 95 percent participation rate requirement. The SD DOE plan states that schools not meeting the requirement for All students or specific subgroups are selected for additional targeted assistance and monitoring by SD DOE's assessment teams 'as detailed in the state's peer review submission.' P41 However, there is not detail in the peer review submission alluding to TSI inclusion for schools who miss participation rate requirements. South Dakota districts will be required to craft an improvement plan designed to address the reasons for which the district did not meet the participation

	requirement. P41 The 95 percent tested requirement will be applied to the Academic Achievement indicator for all students and the Gap and Nongap groups by using the number of tested students or 95 percent of students that should be tested, as the denominator, whichever is greater. Non-tested students above the allowable five percent will earn zero points in the numerator and are included in the denominator of the academic achievement indicator. P24 SD DOE does not indicate if participation is reported separately for ELA and math.
Strengths	The 95 percent tested requirement will be applied to the Academic Achievement indicator by using the number of tested students or 95 percent of students that should be tested, as the denominator, whichever is greater. Non-tested students above the allowable five percent will earn zero points in the numerator and are included in the denominator of the academic achievement indicator.
Weaknesses	SD DOE's administrative rule allows schools with fewer than 40 students to not test up to two students and still be considered to meet the participation bar resulting in participation rates of 80 to 94.87 percent for schools with 10 to 39 students. SD DOE does not provide detail on the inclusion of schools for TSI who miss participation rate requirements. SD DOE does not indicate if participation is reported separately for ELA and math.
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	SD DOE must require 95% of students be tested at each school. SD DOE's administrative rule allows schools with fewer than 40 students to not test up to two students and still be considered to meet the participation bar resulting in participation rates of 80 to 94.87 percent for schools with 10 to 39 students. SD DOE must provide detail on the inclusion of schools for TSI who miss participation rate requirements because the narrative states details are included in the peer review submission but are not. SD DOE must indicate if participation is reported separately for ELA and math.

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	South Dakota CSI schools will exit after four years if they no longer meet the reason for their identification, demonstrate a positive performance trajectory on accountability indicators, and demonstrate improvement on the indicators of highest need. P41-42 CSI schools may petition to exit early if they meet all the above criteria and are meeting their interim targets toward the long-term goals. P42 Some peers do not agree that these exit criteria provide an assurance that a school has made meaningful and sustainable progress.
Strengths	SD DOE established multiple requirements for exiting CSI. The CSI designation period is four years with an exception for early exit if multiple performance measures are met including meeting the interim goals to be on track for the long-term goals.
Weaknesses	Some language in the description, such as "improved subgroup performance" and "positive overall trajectory," is general; the description can be enhanced with more specific detail/elaboration.
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	SD DOE must establish a subgroup evaluation that ensures improved academic achievement for exit criteria.

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	South Dakota TSI schools will exit after two years if they no longer meet the reason for their identification, demonstrate a positive performance trajectory for the subgroup on which the school was designated, and demonstrate the Gap group has not declined on an indicator over the designation period. P44

TSI schools may petition to exit early if they meet all the above criteria and are meeting their interim targets toward the long-term goals. P41

However, there is some concern that SD DOE has set a relatively low bar for exiting additional targeted support status. Schools can exit with low levels of performance. Again, the State discusses subgroup status but the plan has been lacking specificity on how subgroups meaningfully factor into the accountability system. |
| *Strengths* | SD DOE established multiple requirements for exiting TSI.

The TSI designation period is two years with an exception for early exit if multiple performance measures are met including meeting the interim goals to be on track for the long-term goals. |
| *Weaknesses* | Some language in the description (e.g., "positive overall trajectory") is general; the description can be enhanced with more specific detail/elaboration.

SD DOE discusses subgroup status, but the plan lacks specificity on how subgroups meaningfully factor into the accountability system.

Demonstrating the Gap group has not declined on any of the indicators over the designation period is a low bar for an exit criterion; fortunately there are multiple exit criteria.

The use of "all indicators" is not clear. |
| *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* | SD DOE must provide a more precise description related to improved subgroup performance. More specifically define what a positive overall trajectory looks like and what it means to not decline. |

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	South Dakota CSI schools that do not exit within 4 years will be paired with a School Support Team to conduct another needs analysis during the fifth year to reevaluate and revise the school improvement plan. The plan supports and interventions must be agreed upon by the facilitator, school, and SD DOE. The School Support Team will then assist with the implementation of the revised plan. The narrative assures that evidence-based interventions will be included in the plans, but there is no detail on any supports or interventions and no mention of interventions that address school-level operations, changes in school staffing and budgeting or the school day and year. P42-43

Schools will not be directly assisted by the state, but rather assisted by the American Institutes for Research, the comprehensive center and other schools familiar with the improvement process. P42

Using the same mechanisms via the School Support Team that were not effective in getting school to exit CSI initially will not be effective in providing intensive interventions.

Redesign plans must be shared, but not approved, with the school board, stakeholders (not specified), and SD DOE. P43

SD DOE indicates it will continue to work with a comprehensive center to address school improvement but gives no specifics on approach or the intervention process. It appears that the State does not have a theory of action on school improvement nor does it appear to identify best practices The State mentions that school will need to work with their School Support Team but does not describe the team members or their knowledge, skills, or experiences with school improvement strategies. SD DOE's plan will benefit from adding examples of its past successes with school improvement and turnaround efforts, especially in small schools or those with large enrollments with Native American students. Small schools often face challenges addressing school-level operations including changes in staffing to a lack of a large talent pool in rural communities. Similarly, small schools often have small budgets. |
| *Strengths* | |
| *Weaknesses* | The cursory information in this section and reference to SD DOE's intended work in 2017-18 to "clarify the necessary components and needs analysis provisions for use" strongly suggests that at present, SD DOE has not yet sufficiently fleshed out the more rigorous actions that will be taken to address failure to exit comprehensive support status within four years.

The plan for more rigorous interventions mirrors the initial plan for CSI.

No details on the types or rigor of supports or interventions were provided and nothing specifically related to interventions that address school-level operations, such as changes in school staffing and budgeting or the school day and year was mentioned.

No increased effort after 4 years is evident as the last paragraph indicates the Comprehensive Support schools were paired with an SST professional upon identification. |

	SD DOE should think more creatively about the role of the state, more specific state required interventions, and better strategies for district capacity building that focus on student outcomes and not just planning process if schools remain in CSI. These low performing schools have been under district direction to this point and have not successfully improved.
	SD DOE should describe the intervention models the comprehensive center will employ for school improvement and how they address South Dakota's needs.
	SD DOE should consider options for students to exit these lowest performing schools in their first year of CSI identification.
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	SD DOE must provide additional detail to clarify the role(s) of those working with its technical experts to develop and implement needs analysis provisions. In addition, some elaboration on "sharing" of the analysis is needed to make clear whether this process involves input from the various audiences mentioned (e.g., school board, stakeholders) or is simply for informational purposes only. More detail about the School Support Team and other parties alluded to in this response should be included as well, to provide evidence of the expertise and specific resources they bring to the needs assessment process and its follow-up.
	SD DOE must consider specific interventions for schools not exiting in 4 years.

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	SD DOE will host regional meetings to work with districts and schools to review what the school is doing, what their needs are and what support is currently available from SD DOE. 1003 funds will be used for School Support Teams at CSI schools to support implementation of plans and identified interventions like coaching, PBIS and climate interventions with priority funding for CSI. P43
	Districts are required to do an annual 'data dig' to identify trends and successes in interventions to update their school improvement plans as necessary. P43
	SD DOE commits to working with LEAs to review resource allocations but provides little detail on the process.
Strengths	The description includes some specific examples of interventions to Comprehensive and Targeted Support schools that may be funded (p. 43).

	SD DOE will host regional meetings with schools and districts and require districts to do an annual 'data dig' to identify trends and success of interventions.
Weaknesses	SD DOE commits to working with LEAs to review resource allocations but provides little detail on the process. For example, the State discusses "data digs" but does not provide information on what data it might consult. In addition, the State indicates it will use 1003 funds to support the School Support Teams, but does not adequately describe these teams or how they will provide meaningful interventions. SD DOE provides limited detail on how it will work to annually review resource allocation, work with districts and schools and what will result in the review processes beyond updating the school improvement plans as necessary. SD DOE does not provide or explain how it will review resource allocation, only it will, and no actions or consequences are listed based on review findings to support CSI and TSI schools and districts.
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	SD DOE must provide additional detail to specifically address their review of resource allocation to support school improvement in districts serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement. This detail might include process for ensuring equitable distribution of resources among those schools/districts based on needs assessments and specifics on the relationship between the annual "data digs" and past/current uses of funds.

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

➢ 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	SD DOE will provide technical assistance via ongoing conferences and structured professional development. Strategies also include providing CTE development support to high schools with stagnate graduation rates and may include technical advisors for districts with two or more CSI and TSI schools. P43-44 SD DOE includes effective school library programs as important, but does not provide detail on the intent of this statement with respect to technical assistance and TSI/CSI schools. P44 Details about the technical advisor are limited as to the role, responsibility, and evidence of a successful practice. It is unclear what this position will provide

	beyond what is already provided by the district and School Support Team. Additionally, the position may be placed in districts with two or more TSI/CSI schools, but it is not guaranteed. P44
	SD DOE does not describe a plan to differentiate technical assistance to districts and schools.
	SD DOE does not provide a comprehensive or evidence-based approach to providing technical assistance to LEA's serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.
	SD DOE describes several types of support for struggling schools. It will continue CTE support that has shown substantial success in recent years with improving grad rates. Districts with 2 or more schools identified for support <u>may</u> be assigned a Technical Advisor; it is unclear, however, how the role of the Technical Advisor will support student achievement.
Strengths	SD DOE provides specific details on the impact of implementation of high quality career and technical education (CTE) programs on high school graduate rates for all students and for the American Indian subgroup (p. 43).
Weaknesses	Although SD DOE cites the importance of certified teacher/librarians and equitable access to library resources, the description of technical assistance does not make clear how SD DOE plans to identify and address the needs of eligible districts in this regard.
	Noting technical support that "may" be provided weakens this description that is supposed to address support that "will" be provided.
	SD DOE does not provide a comprehensive or evidence-based approach to providing technical assistance to LEAs serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement. For example, the State discusses using federal funds to provide conferences, professional development, and assistance but does not address topic areas or strategies it believes will lead to meaningful positive outcomes for students and educators.
	Even when the State discusses some promising practices such as expanding high quality CTE programs, improving library programs, or assigning Technical Advisors to LEAs with two or more identified schools it presents the information as suggestions not certainties. It does not appear that school improvement status triggers technical assistance to LEAs or that the State uses a methodical approach to identifying LEA and school needs through a comprehensive needs assessment.
	Providing additional options to students for CTE is good policy; however, implementing it as a solution for high schools that have not sufficiently improved their graduation rates degrades CTE options and indicates a lack of rigor. P44
	SD DOE provides no research and limited data to demonstrate that the

	described technical assistance will improve student outcomes.
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	SD DOE must provide more detail on the type ongoing conferences, technical assistance, and structured professional development that will be provided to the districts and schools. SD DOE must provide a rationale for how library programs are designated to schools and why it is considered technical assistance. SD DOE must describe a plan to differentiate technical assistance to districts and schools. SD DOE must provide research or empirical support to demonstrate that the described technical assistance will improve student outcomes. SD DOE must explain why high quality CTE programs are provided as technical assistance only to high schools who have not sufficiently increased their graduation rate and should demonstrate how CTE completions are as rigorous as standards diploma graduation requirements to establish career readiness.

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	N/A: SD DOE will not provide additional optional action. P44
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.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	SD DOE developed the Student Teacher Accountability Reporting System in 2012, but has not produced any data that recognizes if highest poverty and minority schools are more likely to have ineffective, out-of-field, and inexperienced teachers compared to the lower poverty/lowest minority schools. P45 SD DOE outlines a plan to analyze this data, but does not provide a timeline for its availability. P45 SD DOE defines teachers as out-of-field and inexperienced at the state level by ineffective is defined by the districts and is not, and does not plan to, collect it at the state level. P52 SD DOE provided its definitions of inexperienced teacher, out-of-field teachers, low-income student, high poverty schools, minority student, and highest minority school. However, the State does not define or collect data on ineffective teachers, therefore it does not fully meet this requirement.
Strengths	The State has invested in a robust system—SD-STAR to collect data on the educator workforce allowing SD DOE to analyze inequitable access to inexperienced, ineffective, and out-of-field teachers.
Weaknesses	SD DOE does not define or collect data on ineffective teachers; therefore it does not fully meet this requirement. SD DOE has not evaluated the disproportionate rates of access to educators. SD DOE provides no evidence that the data is being used.
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	SD DOE must use their Student Teacher Accountability Reporting System to describe if highest poverty and minority schools are more likely to have ineffective, out-of-field, and inexperienced teachers compared to the lower poverty/lowest minority schools.

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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.

provide to fully meet this requirement	SD DOE must publicly report the measures and progress to reduce disproportionate access. SD DOE must collect ineffective teacher data at the state level for reporting.

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	SD DOE provides limited information on its commitment to improve school conditions. SD DOE will provide [unspecified] technical assistance, structured professional development and multiple programs that address specific needs of schools, teachers, and students to improve conditions for student learning. P46 Specifically SD DOE cites supporting districts using the Multi-Tiered System of Support (MTSS) (RtI/PBIS), school counselor support, child nutrition programs, early warning reports, and onsite coaching and mentoring of teachers stating that these programs help to reduce the incidences of bullying and harassment, the overuse of discipline practices that remove students from the classroom, and the use of aversive behavior interventions that compromise student health and safety.' P46
Strengths	
Weaknesses	The response is overly general, offering little more than a reiteration of the language in the guidance for A6. SD DOE's response to how it will support LEAs on school transitions did not provide adequate information to determine it met this requirement. SD DOE does not provide detail in the narrative to indicate support to improve school conditions, reduce incidences or bullying/harassment, overuse of discipline, or improve health and safety.
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	SD DOE must describe LEA and school needs in respect to school climate issues and how the State is providing targeted support on priority needs. SD DOE must provide a description of supports that will be used to improve school conditions, reduce incidences of bullying/harassment, overuse of discipline, and improve health and safety.

requirement	SD DOE must use evidence-based strategies. Therefore, it should clarify how positive outcomes have resulted from the current strategies and initiatives to improve school climate.

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	SD DOE mainly leaves planning for and assisting school transitions to districts. SD DOE's only listed resource is a policy framework, 'Parent and Family Engagement' toolkit to assist families in navigating critical conditions. P46 SD DOE assures districts will describe strategies for assisting kids in early childhood program with transitions to elementary school in district plans SD DOE reviews and monitors. P46-47 SD DOE cites multiple programs, but does not describe how the state will assist with the transitions. Specifically, SD DOE supports the Multi-Tiered System of Support (MTSS) to assist districts with transitions and to help with dropout prevention, Birth to Three, Career and Technical Education and Library Services support. P47 SD DOE states that timelines and program effectiveness are monitored internally on an ongoing basis through regularly scheduled interdivision, collaborative meetings, but does not state who does the monitoring or what results from the monitoring findings. P47
Strengths	SD DOE identified family engagement as critical to successful student transitions and provides parent and family engagement resources to LEAs. The plan could have been strengthened by providing more detail about its support to LEAs in this area. For example, the State notes it has created a Parent and Family Engagement toolkit but does not detail its theory of change indicate if the State has identified evidence-based approaches or if LEAs need to identify the research base. Though not explicitly required, the SD DOE includes Early Education to Elementary school transitions in district plans.
Weaknesses	The description provides minimal information on how SD DOE will work with LEAs receiving assistance under Title I, Part A to provide effective transitions to middle and high school to decrease the risk of students dropping out. The State discusses programs such a Birth to Three, CTE, and library support that address transition efforts. However, SD DOE provided little information

	on these programs or their successes. SD DOE over relies on districts for school transitions and does not describe any specific state support or assistance beyond the toolkit. SD DOE does not describe any actions the state or districts will take to assist students with school transitions. It is not clear who will monitor the effectiveness of its strategies or what will result in the monitoring findings.
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	SD DOE must provide more detail on the state's role in identifying strategies and supporting districts, the effectiveness of the listed transition programs, who will review and revise the strategies if needed, and how the strategies will decrease the risk of students dropping out. SD DOE must provide additional detail to elaborate upon support it provides to facilitate effective transitions to middle and high school with specific attention to decreasing the risk of students dropping out.

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	SD DOE described the entrance and exit procedures for English learners developed by the EL workgroup consisting of teachers, district leaders, administrators from EL immersion centers, EL consultants, and high education representation over a period of nine months and then confirmed after statewide stakeholder input. All English learners will be assessed within 30 days of enrollment. P62
	
	South Dakota state entry procedures require (P62-63):
	    1. Home Language Survey
	    2. Standardized screening process
	          a. Screener assessment or an abundance of evidence of academic success (GPA or assessment scores form a prior school)
	          b. WIDA screener

	c. A score of not proficient on the screener will be considered EL
	
	South Dakota state exit procedures require (P63):
	    1. Proficient outcomes on ACCESS for ELLs 2.0 assessment - Composite Score of 5.0
	    2. For SWD Alternate ACCESS achieving P1 or higher, or determination by IEP team that the student has reached diminished progression.

Strengths	SD DOE provides a clear and thorough account that addresses not only the general student population but students with the most significant cognitive disabilities as well. SD DOE convened a working group of English learner experts to determine entry and exit requirements, including those in districts with large EL populations across the State. For students with the most significant cognitive disabilities, the State is using the Alternate ACCESS assessment. Students are quickly identified upon enrollment. Consistent regulation and guidance documents outlining entry and exit procedures are used across the state.
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	SD DOE provides a high-level response stating that ELs will be supported through WIDA Summative English Language Proficiency State Standards, required 100 percent participation in the ACCESS 2.0 annual administration, and regular analysis of data. P63

| | A statewide English language proficiency assessment WIDA ACCESS 2.0 is used to determine and measure the long-term goal and interim goals.

SD DOE uses criterion based growth to measure the progress of EL on English language proficiency for purposes of accountability.

SD DOE's plan provides a high-level explanation of how the state will actually assist eligible entities in meeting the standards, through data analysis to identify districts needing support, the Title II consortium of districts to provide support, resources, and training for program implementation, state purchased online reading interventions, statewide training offered to schools with ELs, and 'other evidence based practices (not described). Most of the responsibility is on the districts.

SD DOE does not specifically describe how it will provide technical assistance to districts which underperform against the state's interim targets on EL proficiency. SD DOE will provide a criterion-based growth model to measure student progress toward EL proficiency; however, SD DOE does not describe any strategies it will use to specifically support EL progress and proficiency.

SD DOE describes its standards for English language proficiency but does not describe how the SD DOE will assist entities to ensure EL can also meet the state's challenging ELA and Mathematics standards.

SD DOE Division of Learning and Instruction and Division of Educational Services and Support will develop plans to support districts in which students are struggling to meet ELP and content standards. Various supports for those districts are proposed (e.g., online reading interventions, Core Reading, other evidence-based practices). |
|---|---|
| *Strengths* | SD DOE provides a specific example of a professional development needs identified and also elaborates on the use of ACCESS 2.0 data to inform delivery of technical assistance to systems with low-incidence EL populations that may lack background/resources in attending to those students.

SD DOE is using the WIDA standards that are aligned with the State's content standards, which could help English learners access and succeed on challenging academic standards.

As a WIDA member, the State and LEAs have access to technical assistance resources on effectively supporting English learners.

The State will review LEA practices on assessing English learners on an annual basis. Those that fall below the 100 percent threshold will receive technical assistance on identification and assessment procedures. The plan could be strengthen by providing the percentage of LEAs that test less than 100 percent of English learners. |
| *Weaknesses* | It is not clear how State support and district action will ensure that SD DOE will reach 100 percent English Learner Proficiency by 2031. |

| | Development of goals and targets does not equate with helping LEA's ensure that English learners meet challenging state academic standards.

SD DOE should describe specific support, not just general offerings, that will support ELs in meeting language proficiency. |
|---|---|
| *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	SD DOE will create a risk assessment tool through 2017-18 with the new statewide Title III consortia, EL work group, and WIDA and the Comprehensive Center to determine which entities will be receiving which type of monitoring [not described]. P64

Monitoring is done to ensure the fidelity of the program and activity alignment to allowable objectives. SD DOE will host annual statewide Title III meetings and professional development and technical assistance to all eligible entities to help achieve the goals of the grant applications but the purpose and content of these offerings is not defined. P69 |
| *Strengths* | SD DOE is developing a monitoring plan in collaboration with the English learner workgroup, WIDA, and its comprehensive center. |
| *Weaknesses* | It is unclear when SD DOE first plans to utilize the risk assessment tool.

There is a minimal description of who is monitored, statewide meetings and technical assistance providing no information on the content or how it will help ELs achieve language proficiency. |
| *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* | SD DOE must provide a plan and timeline for developing the monitoring system and describe potential indicators that will be included. Also, identify the office responsible for monitoring and whether the State will monitor all LEAs each year or a sample.

SD DOE must provide a description of the content and purpose of the |

| | statewide meetings and eligible entity professional development and technical assistance in the context of helping ELs achieve language proficiency.

SD DOE must provide additional detail to clarify the operation of the risk assessment tool mentioned in this entry. |
|---|---|