

ESEA Flexibility

Peer Panel Notes



State Request: South Dakota

Date: 3/27/2012

REVIEW AND EVALUATION OF REQUESTS

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

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

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

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

Consultation Question 1 Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The South Dakota Department of Education (SDDOE) assembled work groups to assist in the development of the accountability plan and State standards for teaching. The working groups assembled a mix of stakeholders but the presence of tribal teachers, teachers of English Learners and students with disabilities was not obvious.
<i>Strengths</i>	• SDDOE assembled an Accountability Work Group made up of 23 individuals representing key stakeholder groups to provide recommendations regarding a new accountability model for South Dakota. Key groups include school administrators, teachers, tribal educators, higher education, and business (p. 9). • A Teacher Standards Work Group was also created to develop State standards for teaching. The group included teachers, principals, superintendents, school boards, parents and higher education (p. 9).
<i>Weaknesses, issues, lack of clarity</i>	• No mention is made of including Tribal educators in the work group that has been developing the Teacher standards. • There is limited evidence that teachers of students with disabilities, English Learners and Native American students were consulted.
<i>Technical Assistance Suggestions</i>	• Establish a mechanism for ongoing engagement from a broader cross section of educators to include Native American and English Learner teachers to ensure understanding and buy-in as the teacher evaluation rolls-out.

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*
- *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

Consultation Question 2 Panel Response

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	SDDOE solicited input from a variety of stakeholders using technology and other means most appropriate for the highly rural State. The mix of stakeholders, however, included few Native American/ Tribal communities and educators.
<i>Strengths</i>	• Given the highly rural nature of South Dakota, the SEA effectively relied on electronic media to solicit public comment on the draft flexibility request. SDDOE provided two rounds of public comment on the draft flexibility request developed by the 23-member work group (p. 10). • In addition to posting the draft on the SDDOE website, the SEA hosted a series of conference calls with a range of targeted groups. The list of groups includes practitioners, including special education directors, administrators, superintendents, Tribal education department and parents (p. 10). • SDDOE describes three major areas which were revised in the flexibility request in response to the input from comments received through the public engagement process: include growth measures, unduplicated counting of students who are in multiple subgroups, and use of 'completer rate' vs. 4-year graduation rate.
<i>Weaknesses, issues, lack of clarity</i>	• The list of groups did not include civil rights groups or community organizations that advocate on behalf of high-need communities and outreach to the Native American and Tribal communities is not evident. • The parent outreach was limited to the Parent Teacher Association (p. 10).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• Reach out to advocacy organizations that work with high need communities and provide comprehensive information to a broader parent audience, beyond the Parent Teacher Associations (PTAs). • Describe to parents and high-need communities how the standards and accountability system will ensure that their children receive access to high quality education.

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

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

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

- 1.B Part A:** Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part A

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• SDDOE has an ambitious plan to implement the Common Core Standards and is relying on a set of (1) state initiatives that include standards alignment cross-walks and professional development and (2) external resources such as the assessment Consortia.
<i>Strengths</i>	• Since its adoption of the Common Core State Standards (CCSS) released in 2010 the SDDOE has been working on rolling out the implementation in a methodical manner based on four specific phases to support districts in their understanding of the standards and implementation. • SDDOE conducted a crosswalk of the CCSS against the State standards to examine the extent of alignment between the two sets of standards. The crosswalk also identified the areas that should be addressed in professional development (p. 15). • SDDOE posted the crosswalk with all educators in South Dakota and is supporting implementation activities, such as a pilot program during the summer, to inform and create tools for districts and schools (p. 15). • State-supported professional development is guided by the crosswalk documents and the lessons learned from the summer pilot program (p. 16).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	• The objectives of the professional development do not include integrating CCSS for English Learners (it does for special education) (p. 16). • The focus of the pilot program and the professional development is on teachers. Administrators, principals and instructional leaders are not part of the first phase of professional development. Principals and instructional leaders are key to creating and supporting the learning environment that is conducive to teachers to implement the common core standards in their classrooms. The professional development initiative does not include teachers of English Learners and teachers of students with disabilities in its target audiences (p. 18). • The two professional development sessions for 2011-12 focus on mathematics and literacy integration but make no formal link to the pilot program that unpacked the standards and developed units and assessments for a more coordinated implementation that builds on tools and work done at the state level. • SDDOE is relying heavily on the WIDA English Language Proficiency (ELP) standards and the subsequent alignment work to the CCSS. The application provides an inaccurate description of what ACCESS test measures in English Learners—it is solely an instrument to measure students' English Language Proficiency (it does not measure content area knowledge). • SDDOE will address assessment issues related to both English Learners and students with disabilities primarily through the work of the Consortia and the Enhanced assessment grants. The plan does not include efforts to build South Dakota's in-house capacity to understand and address the standards and assessment needs of students with disabilities and English Learners (p. 18). • The career ready expectations appear to be in the early planning or work stages. • SDDOE's role in supporting the transition from current standards to the CCSS is limited with regard to assessments. SDDOE will embed CCSS items into the existing state assessments so that educators can gain insight as to how students would perform on consortia assessments. This work requires resources, time, and sophisticated test analysis that should not be left to each individual LEA.
<i>Technical Assistance Suggestions</i>	• Incorporate teachers of English Learners and students with disabilities as well as principals into professional development. • Provide state-level support in the transition to new assessments to help educators through the transitional assessments to the Smarter Balanced assessments and to help educators understand what students' scores mean. • Consider using an intermediary support organizations (<i>e.g.</i>, ESA, IHE, national groups leveraging the Digital Dakota Network) to provide targeted support to LEAs.

Part B: Is the SEA’s plan likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the college- and career-ready standards?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part B

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	At this early stage the implementation plan does not yet specifically address the needs of subgroups of students including Native American students and English Learners.
<i>Strengths</i>	• SDDOE is connecting to the Board of Regents and the State’s teacher preparatory programs • SDDOE is proactively seeking to work with higher education in order to align the teacher preparation programs to the common core (p. 21).
<i>Weaknesses, issues, lack of clarity</i>	• The plan does not address particular subgroups in the narrative of its implementation of the CCSS, particularly, SDDOE does not clearly address how Native American students will get support. • SDDOE’s proposed accountability plan would not assess English Learners in content areas until they have become proficient in English. Such exclusion would likely result in English Learners not receiving standards-based instruction and the lack of content achievement data would negate important information for instructional responses (p. 24). • The implementation plan is in its early stages and important components are not yet in place.
<i>Technical Assistance Suggestions</i>	• Explicitly address how the needs of English Learners and other subgroups that are sparsely distributed across the districts in South Dakota will be met within the larger plan for implementing the CCSS.

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

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

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

If the SEA selected Option B:

If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, Option B Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

Principle 1 Overall Review

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

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	SDDOE recognizes that LEAs will need additional tools and supports to transition to college- and career-ready standards and is providing tools and funding. Additional work needs to be done to address the needs of English Learners and students with disabilities.
<i>Strengths</i>	• 8 million dollars in Governor's budget was appropriated by the legislature.
<i>Weaknesses, issues, lack of clarity</i>	• SDDOE proposes to exclude English Learners from taking State Test of Educational Progress (STEP) (state assessments) for up to 3 years and instead measure their achievement using the ACCESS test (p. 24). • SDDOE indicates that the South Dakota Assessment Portal (online bank of Common Formative Assessments (CFA) items) is being developed to supplement what is available through the SMARTER Balanced Consortium. These items will be used to assess student mastery and inform instruction. LEAs will need support in developing high quality common formative assessments from the item bank. Similar support needs to be provided for analyzing student performance on common core test items embedded in current statewide assessment (p. 22).
<i>Technical Assistance Suggestions</i>	• Include all English Learners, except for new arrivals in their first year, in the content assessments (state and CCSS) and explore how ACCESS scores could be incorporated into the index to measure the growth of English Learners in English acquisition. • Increasing the quality of instruction is going to require extensive professional development of teachers, focused leadership development of principals and instructional coaches/leaders, and increased capacity of all site-level educators to understand and use the growth data drawn from the new assessments to inform classroom pedagogy. Building on how the SEA has introduced the CCSS, the SEA will need to both undertake these tasks and have a mechanism for determining the impact of the SEA's support initiatives.

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

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

2.A.i Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? (*note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b*)

2.A.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
<i>Rationale</i>	The accountability system is based on using a school performance index and ranking the schools based on the overall index scores. Schools would be classified in categories based on the percent of schools at the top, bottom, and middle. The index includes indicators for achievement, growth, high school completion, and is different for high schools than for middle and elementary schools. Students are categorized as either in a subgroup that includes the traditionally low performing students or not in that subgroup. Subgroup performance is included in the index by weighting each indicator's data by the relative size of the subgroup. There are some strengths recognized in the accountability system and what it is intended to accomplish, but clarifications or revisions are needed to reach a complete, coherent accountability system.
<i>Strengths</i>	• SDDOE is working to create a continuous improvement system that is comprehensive and based on multiple measures.
<i>Weaknesses, issues, lack of clarity</i>	• It is unclear how the system will be introduced to schools. • Weights in the index do not seem to create an incentive to close achievement gaps by subgroup. Weighting the scores of the low-performing subgroup further masks the performance or growth of that subgroup. • There is a lack of clarity on how much actual performance in each of the 5 categories is needed to meet the standard deviation gains shown in the index system. • The inclusion of other types of high school completion weakens graduation rate accountability.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• Instead of measuring only high school seniors, measure what percent of entering 9th graders ultimately reach the target ACT score. • Weighting within the index should be well thought out to balance the SEA's objectives. • The panel suggests that the SDDOE figure out what information it is looking for in measuring attendance rates, what is it trying to measure and what it is trying to fix for which groups? Then analyze these data to see if this is a mobility issue, chronic absenteeism issue, etc. The panel suggests disaggregating attendance by subgroup or move to measuring chronic absenteeism to address any areas of attendance in subgroups. Make sure that the data points SDDOE is measuring will drive schools to attend to those issues. • In choosing a school climate measure, make sure to choose one that captures perspectives of all students and parents, including Native American students, English Learners, students with disabilities, and other subgroups, as well as behavior and discipline indicators. Ensure that the tool(s) chosen will collect valid measurements. Pilot this measure in 2013-2014 before full implementation.

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

2.A.i.a Panel Response

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	SDDOE proposes a weighted indicator system that includes different indicators for elementary & middle schools than for high schools. Student achievement on reading and math is included for both levels. High school completion (including graduation rate) & college and career readiness is included for high schools. Academic growth and attendance are included for elementary and middle schools. Beginning in 2014-2015, two additional indicators will be added for both types of schools: effective teachers and principals and school climate.
Strengths	• A combined subgroup for small schools with a smaller minimum “n size” of 10 students will include more students in the accountability system as the individual subgroups are often too small to count at a school level. • The panel found the proposed inclusion of a school climate indicator to be a strength. • Recognition of high school students who stay in school even though they do not graduate in 4 years provides incentive to work towards goal of all students ultimately graduating or being prepared for college or career.

<i>Response Component</i>	<i>Peer Panel Response</i>
Weaknesses, issues, lack of clarity	• The student achievement score is based on a weighted combination of the scores of the students in the subgroup (low economic, students with disabilities, English Learners, Black, Native American, and Hispanic) and the other students who are not in the first subgroup. There is no score for the “all students” group. The fact that the scores are weighted by the size of the subgroup can further mask the low performance of that group. • It is unclear how the factors both for calculating achievement and the overall index score would compare to the current AYP and AMO targets. • ACT scores are a component of the college and career readiness. Based on information received in the conference call, the ACT is not required for all high school students, but 68.8% of graduating seniors took the ACT. 14.4% of students with disabilities and 36.5% of the English Learners students take the ACT. Consider whether this measure might over-inflate the school score based only on students who voluntarily take this indicator. • The academic growth indicator for elementary and middle schools to measure the difference between expected growth and actual growth is proposed. This is described as a value added model for growth that employs linear regression statistical tools, but no examples were given of how the model works. In other places in the flexibility request the SEA indicates that it currently cannot measure student growth at the teacher level within one school year with its current assessments for the purpose of teacher evaluations. It is unclear if the current assessment system measure of growth from one year to the next is statistically valid. • The indicators for teacher and principal effectiveness and school climate that will be implemented in 2014-2015 have not yet been fully developed. • The ranking system for schools does not allow for most schools to ever reach the “status” or “exemplary status” category because it is based on the top % and bottom % and not fixed targets that any school could necessarily reach. It has the potential of not providing incentives to schools to be able to work towards and reach targets on what they accomplish rather than being impacted by what other schools accomplish. • The panel had concerns that attendance may be weighted too heavily in the index. • The panel had concerns about the use of the “completer rate” in the overall graduation rate calculation. The completer rate seems to be weighted too heavily at 75% and graduation rate at only 25%. The panel also had concerns about the definition of a “completer”, as anyone who is not officially considered a drop-out. There was also concern about counting completion of the Language Acquisition Plan as completing, yet there is no definition of the LAP. No graduation or completion rates were proposed for subgroups. • The panel was concerned that there is no measure of academic growth at the high school level.

<i>Response Component</i>	<i>Peer Panel Response</i>
Technical Assistance Suggestions	• The SDDOE should draw on national resources of validated tools and systems to measure school climate. Analyze the data available on the new civil rights database. • The panel suggests that the SEA not use completer rate. The SEA could instead include an extended rate. In any given year, measure both the 4-year graduation rate and the total number of students graduating regardless of how long it took them. • Include other indicators in the College & Career Ready factor so that every high school graduating senior will have participated in at least one indicator (such as an industry certification, Advanced Placement (AP) or other measures) so that all students are included in this measure. • Include a description in the revised request of the Value Added Model for growth that will be used for the academic growth indicator in the elementary and middle schools. Develop a layman’s description of the value added model for growth that can be used with districts, schools and communities. • Consider weighting the “effective teachers and principals” indicator at 10%. • In response to questions from the Peer Review panel, the SEA indicated that there were 6 schools with K-12 grade configurations and that they would report an index for those schools separately, once in the elementary category for grades K-8 and once for the high school grades. Suggest considering choosing one index or the other perhaps depending on the size of the school and the number of students in the grades 3-8. If the school is small, or has a small number of high school students, it may not be practical to create an index for the high school level. Or, as an alternative, create a modified index just for the K-12 schools that could include the graduation rate as part of the index.

- b. Does the SEA’s differentiated recognition, accountability, and support system create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students?

2.A.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	While the proposal for a smaller subgroup size and a combined subgroup will be a positive change to encourage schools to focus on subgroups that were not represented in the past, there is not enough evidence that this one measure of achievement in the overall school performance index would carry enough weight to be a factor in improving the student achievement of these typically low performing groups.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	• A combined subgroup for small schools with a smaller minimum “n size” of 10 students will include more students in the accountability system as the individual subgroups are often too small to count at a school level.
<i>Weaknesses, issues, lack of clarity</i>	• There is no specific measure of proficiency gap between the subgroups. • The size of the subgroup is used to proportionally weight the achievement score of that subgroup. There are many ways to make continuous improvement without improving performance of the subgroup because SDDOE is using the percentage of the size of the subgroup and low weighting within the index. Once you include the gap group in the index, the low achievement of that group seems to disappear. Subgroup 1 may mask the low performance of subgroup 2. • The example of calculating the student achievement index score on page 29 is not easily understandable. • There is not a link between the achievement or proficiency gap of the subgroup to the focus schools definition. • Achievement calculations are very complex, they will likely be unclear to teachers and principals and so unlikely to be effective in providing incentives for schools to improve for all students and especially for those in low performing groups. This also leads to a lack of transparency. • SDDOE has included an additional waiver request in the document, requesting that English Learners are not included for three years in the state assessment, and to instead measure growth with the English language proficiency assessment, the ACCESS for English Learners. • SDDOE expressed concern about attendance of Native American students but does not directly address this in the index.
<i>Technical Assistance Suggestions</i>	• Create a separate indicator for achievement and graduation rate gap closing. Ensure that the gap closure measure is weighted heavily enough to incentivize schools to focus on it. Perhaps take some of the points away from attendance or Indicator 4. • Provide a clear report format for parents and the public that shows all the elements of the School Performance Index for each school, to ensure transparency and understanding of the school’s overall score and ranking within all the schools.

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

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

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

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

- a. Note to Peers: Staff will review 2.A.ii.a
- b. Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?
- c. Note to Peers: Staff will review 2.A.ii.c

2.A.ii.b PANEL RESPONSE

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

2.B Set Ambitious but Achievable Annual Measurable Objectives

2.B Note to Peers: Staff will review Options A and B.

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts through one of the three options below?

If the SEA selected Option C:

Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

- i. Did the SEA provide the new AMOs and the method used to set these AMOs?
 - ii. Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?
 - iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
 - iv. Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups? (Attachment 8)
- *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*
- *Are these AMOs ambitious but achievable given the State’s existing proficiency rates and any other relevant circumstances in the State?*
- *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B, Option C (including Questions i–iv) Panel Response

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• AMO targets are proposed for each school for a five year cycle. The targets are set based on where the school falls in the ranking in the base year based on the school performance index. The highest performing schools (in the top 10%) would need to maintain or improve their school index score. There was not a strong rationale presented for how these AMO targets were chosen. • The AMOs proposed by the SDDOE do not meet the guidance.
<i>Strengths</i>	• Lower performing schools would need to show more growth to meet the target than higher performing schools, thus possibly closing the achievement gap. It is unclear if schools could show growth based on the non-low-performing subgroup without actually closing achievement gaps.
<i>Weaknesses, issues, lack of clarity</i>	• The AMO targets are based on the school growing by fractions of standard deviations of the overall school performance index score over a period of the next 4 years in the 5 year cycle. Schools in the higher categories of performance based on the ranking system will have smaller targets than those in the lower categories. • As explained by SEA in conference call, the AMO targets are set on a 5-year cycle, but due to the new assessment in 2014-2015, the SEA will reset the targets after two years. The proposal should clearly specify that the targets for 2012-2013 are based on the assessment data from 2011-2012 assessments. In that case, the targets would not be able to be reset for 3 years; <i>i.e.</i>, there would be new targets for 2015-2016 based on the 2014-2015 assessment data. This also aligns with the implementation of the teacher and principal indicators; if the new evaluation is not implemented until 2014-2015, the targets would apply to 2015-2016 based on the data from 2014-2015. • Schools are categorized as “progressing” if they are in the rankings between the highest performing and the priority and focus schools. It is unclear if these schools are actually making progress or are simply performing at a higher level overall than the lowest 15% of the schools.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	The panel has concerns that the AMO model presented is complex and difficult to put into operation on a statewide basis without a very sophisticated infrastructure of support. There are two potential next options, one is to refine and clarify the currently proposed model. A second option is to develop an approach for AMOs that is easier to understand, communicate and operationalize. • In refining the current model, use a transparent measure of growth and develop a crosswalk of what a standard deviation means in terms of points on your index. The AMOs will have to make sense to front line educators and will incentivize them to attend to issues of low performance, especially in subgroups. • The AMOs must include targets in English and math. • Provide a clear rationale for the chosen AMO targets and why they are considered ambitious.

2.C Reward Schools

2.C.i Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools?

2.C.i PANEL RESPONSE

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	No rationale provided.
<i>Strengths</i>	• The panel liked the concept of the two-tier system.
<i>Weaknesses, issues, lack of clarity</i>	• Based on the response to the Peer Review panel question, the SEA indicated that a high school would be considered for the high progress category by calculating the difference in the overall score of the School Performance Index over a two-year period, rank ordered from highest to lowest, and then selecting the top 5% as high progress schools. The description for high progress elementary and middle schools is based on differences in only the academic growth indicator, not the overall school performance index. • Peers were concerned that reward schools could be high-performing or high-progress and not necessarily be performing well academically, if other indicators in the index outweigh academic progress. • The SDDOE does not present information about closing gaps, or if a school can be in the reward school categories without closing gaps.
<i>Technical Assistance Suggestions</i>	• Clarify in the description the different calculations for the elementary and middle schools and the high schools. • Make reward school criteria based on three or more years of data.

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

2.C.iii Are the recognition and, if applicable rewards, proposed by the SEA for its highest-performing and high-progress schools likely to be considered meaningful by the schools?

➤ *Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The recognition proposed – “branding” efforts including logo for stationary, letters from governor, media releases, etc. – has the potential for motivating schools that receive the recognition to continue to perform well and to be meaningful to them.
<i>Strengths</i>	• Some interesting ideas for recognizing high-achieving schools.
<i>Weaknesses, issues, lack of clarity</i>	• Unclear if schools or LEAs were specifically consulted about the reward recognition, but the statewide work group created the plan. • Statewide branding effort is only a start, more substantive steps are needed.
<i>Technical Assistance Suggestions</i>	• More direct relationship between reward school and academy of pacesetting districts, draw lessons learned from reward schools in how they changed conditions and raised achievement. • Use technology to connect high-performing to low-performing schools. • Ask the schools what is considered meaningful recognition.

2.D Priority Schools

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

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

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

2.D.iii.a (including questions (i)-(vii)) Panel Response

Tally of Peer Responses: 1 Yes, 5 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Most of the interventions were mentioned, but they were embedded in different levels of support provided by the SEA, the district, and the school, so it was not completely clear if all specified interventions would be required, nor if they would all be required in the first year of the three year implementation.
<i>Strengths</i>	• SDDOE recognizes that the SEA, district, and school all need to be involved in the improvement effort.
<i>Weaknesses, issues, lack of clarity</i>	• Response to Intervention (RTI) was mentioned as an intervention. This may be intended to meet the required intervention of using data to inform instruction and for continuous improvement. One item under the school level indicates conducting an “annual” data analysis. This would not be sufficient to inform instruction. • The panel was concerned that providing “opportunities” for parent and community involvement is not the same as “ongoing mechanisms for family and community engagement.” • Intervention (vi) “establishing a school environment...” was not addressed. • It is unclear if priority schools will be required to implement all of the interventions aligned with the turnaround principles, or if they will begin in the first year of implementation and will be continued over the entire three years. • The panel found the specifics of the “how to” implement these interventions were missing; this made it unclear if what is presented would lead to dramatic change. • Only Title I-eligible schools, or Title I-eligible high schools with a graduation rate of less than 60%, may be identified as priority schools.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• Separate TA and support from monitoring functions. Use separate personnel to monitor. • Make sure the list of required interventions is very clear, then elaborate on the support and assistance that will be required or provided at each level – by the SEA, the district, or the school. • Determine which districts’ capacities need to be developed in order to sustain the improvements in priority schools. • Recognize that serving these schools is a large undertaking, that much more significant reforms will need to be put in place. Moving from 5 SIG schools to 31 priority schools in one year needs to be understood as a major potential strain on State resources. • Ensure that school support team members, both contractors and State staff, receive specific training both in areas required to provide support in school turnarounds and strategy implementation as well as training in coaching as opposed to consultation. • Clarify the description so that it is clear how the RTI system is implemented in the State, providing context for the reader to understand the intervention. The description of the RTI models was based on information from the National Association of State Directors of Special Education.

b. Are the identified interventions to be implemented in priority schools likely to —

- (i) increase the quality of instruction in priority schools;
- (ii) improve the effectiveness of the leadership and the teaching in these schools; and
- (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b (including questions (i)-(iii)) Panel Response*Tally of Peer Responses: 2 Yes, 4 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	It is not completely clear how fully the required interventions would be expected to be implemented. Specific strategies for English Learners and students with disabilities were not discussed, but could be addressed through the multi-tiered intervention system.
<i>Strengths</i>	• The panel found the use of the Academy of Pacesetting Districts, the Indistar online school improvement tool, and the use of RTI to be a strength. • For schools and districts that currently lack professional development support, they are likely to get more resource support through this strategy than before. • In SDDOE's attempt to build an integrated system for priority schools, it has tried to spell out clear roles and linkages between SEA, districts and schools.
<i>Weaknesses, issues, lack of clarity</i>	• The description of RTI indicates that schools should assess their readiness and capacity to adopt and implement RTI, but it is not indicated if this will be required, and if so, what type of support the school would receive to ensure that the RTI would be implemented fully at the beginning of the three year intervention period. • The Panel felt that there was not enough detail presented by the SDDOE to assess whether the interventions presented for priority schools are likely to improve student achievement. • The request did not have enough detail about how schools and districts will work specifically with lower-performing groups, including Native American and English Learners.
<i>Technical Assistance Suggestions</i>	• SDDOE should establish a mechanism to measure quality of implementation in priority schools, and inform mid-course corrections.

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

2.D.iv Does the SEA’s proposed timeline ensure that LEAs that have one or more priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year?

- *Does the SEA’s proposed timeline distribute priority schools’ implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv Panel Response

Tally of Peer Responses: 5 Yes, 1 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Some elements of the timeline are unclear and it is not clear if all priority schools will begin implementing some interventions in 2012-2013 and phase in additional interventions over the three year period or if they will be required to implement all interventions in 2012-2013 and carry them out for the full three years.
<i>Strengths</i>	• SDDOE indicates that it will implement interventions in priority schools in the 2012-2013 school year.
<i>Weaknesses, issues, lack of clarity</i>	• There is a concern that sufficient planning time was not allotted.
<i>Technical Assistance Suggestions</i>	• Consider the capacity of the SEA and districts to implement the complete set of interventions in priority schools newly identified based on 2011-2012 assessment data. A period of thoughtful planning with implementation beginning in 2013-2014 will provide a greater likelihood that the school will be successful in the implementation of interventions that will improve student achievement.

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

- a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?
 ➤ *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The criteria are solely based on not being in the lowest 5% at the end of the three year interventions.
<i>Strengths</i>	• No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	• The priority school exit criteria are not specific to reaching a target or making significant progress. They appear to be based on not falling into the bottom 5% again after three years. Peers are concerned that the SEA will not be able to distinguish between lowest performing schools that are improving and those that are not improving. • It was unclear if Title I eligible schools with a high school graduation rate of less than 60% but a higher academic achievement level will be able to exit if the graduation rate is improved. • Exit strategy needs to be better defined and include a definition of significant progress, and the capacities needed at the district level to sustain the improvements at the schools.
<i>Technical Assistance Suggestions</i>	• Determine exit criteria that will clearly enable schools to determine if they have met the criteria and will therefore be eligible to exit the status, regardless of the ranking system. This will provide incentives to the school to be able to “control their own destiny.”

2.E Focus Schools

Note to Peers: Staff will review 2.E.i, 2.E.i.a, and 2.E.ii

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools? If the SEA’s methodology is not based on the definition of focus schools in *ESEA Flexibility* (but is instead, e.g., based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools Meet ESEA Flexibility Definitions” guidance?

- a. Note to Peers: Staff will review 2.E.i.a.
- b. Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The focus schools are the lowest performing 10% of the schools in the State that are not already identified as priority schools based on the school performance index score. This may or may not be based significantly on the performance of subgroups. The index scores are different for elementary and middle schools than for high schools, but the description of the identification of different levels of schools was not provided.
<i>Strengths</i>	• No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	• Need more information about how the focus schools are identified, such as showing the calculations of the index score to see what factors are driving the low scores. • Not enough of a focus on gaps, unclear if they are schools with gaps because it is only based on the index. • Because the index is being used, unclear if focus schools with achievement gaps as defined in the flexibility will actually be picked up.
<i>Technical Assistance Suggestions</i>	• Create a methodology that focuses on gaps. • Clarify that Title I-eligible schools may not be identified as focus schools.

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

2.E.iii Does the SEA’s process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2012–2013 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?

- *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*
- *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• A clear timeline was not provided for focus schools as it was for priority schools. Some of the interventions that were mentioned were also those required for priority schools. No description is provided for how SDDOE will determine if schools are narrowing the achievement gaps or making specific progress.
<i>Strengths</i>	• No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	• Lack of description of what “adequate resources” would be that the district must provide for the school. Any funding sources? • Also, the interventions may include “tutoring and public school choice” without specifying how this was different from the current SES requirement and without providing a definition of choice.
<i>Technical Assistance Suggestions</i>	• Customize interventions to address the reason(s) the schools were placed into the focus category in the first place. • Add support for comprehensive needs assessment coming from the SEA. • Establish a clear process for focus schools to request support from the SEA. • Ensure that any tutoring services use strategies that are research-based and effective for addressing the needs of the subgroups.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

a. Do the SEA’s criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

➤ *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Criteria for exit is based on not being in the bottom 15% of schools as ranked at the end of the second year of interventions. If the index score improves, it is not clear whether that is because the achievement gap is closing or for another combination of factors.
<i>Strengths</i>	• No strengths noted.
<i>Weaknesses, issues, lack of clarity</i>	• Without clear exit criteria, peers are concerned that schools could exit priority status by getting out of bottom 15% without significantly improving achievement and narrowing achievement gaps.
<i>Technical Assistance Suggestions</i>	• Determine exit criteria that will clearly enable schools to determine if they have met the criteria and will therefore be eligible to exit the status, regardless of the ranking system. This will provide incentives to the school to be able to “control their own destiny.”

2.F Provide Incentives and Support for other Title I Schools

2.F.i Does the SEA’s differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?

2.F.i Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• Specific supports for other Title I schools were not identified.
<i>Strengths</i>	• Moves to a minimum “n size” of 10 in order to allow South Dakota to do some differentiation. • Created large category of progressing schools.
<i>Weaknesses, issues, lack of clarity</i>	• The flexibility request does not present a coherent strategy for providing incentives and supports to other Title I schools. • It is unclear what is the current capacity of the Education Service Agencies (ESAs), and what additional capacities will be required given the SEA’s new areas of emphasis.
<i>Technical Assistance Suggestions</i>	• SDDOE needs to move from policy to effective practice. In part this means moving from having an amalgam of disparate programmatic initiatives to a coherent strategy that can actually reach the classrooms and improve pedagogy, whose targets are specific, and that the State can support with quality and integrity. Specifically, the SEA should identify which parts of the strategy have the greatest likelihood of reaching the classroom and improving instructional practices. Then, the SEA should ensure that there are sufficient resources for implementing these components effectively.

- 2.F.ii** Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?

2.F.ii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Specific supports for English Learners and students with disabilities not described.
<i>Strengths</i>	• The SEA is proposing a minimum “n size” for a combined subgroup that includes the lowest performing students, including English Learners and students with disabilities, that will be an incentive for schools with small populations to provide supports for students in these subgroups that had not been counted previously in AYP calculations. • Governor’s proposed budget calls for \$8.4 million to train teachers in common core State standards and teacher evaluations.
<i>Weaknesses, issues, lack of clarity</i>	• Lack of strategies directed towards closing achievement gaps for Native Americans. • No differentiation of needs of larger versus smaller districts within the State.
<i>Technical Assistance Suggestions</i>	None provided

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

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

2.G (including i, ii, and iii) Panel Response*Tally of Peer Responses: 0 Yes, 6 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
Rationale	• SDDOE reiterated its overall State system of support that includes three focus areas: districts, teachers/administrators, and students. Title monitoring is provided on a three-year cycle, but it appears to be describing federal compliance monitoring, not specific monitoring of interventions in priority and focus schools. It is not clear how the state will hold districts accountable for improving school and student performance. A process for approving external providers was not described. • SDDOE has a lot of pieces in play. It's more an amalgam of parts than a focused strategy that is likely to reach the classrooms and improve both the quality and results of instruction.
Strengths	• Academy of Pacesetting Districts is a potential strength. • The Indistar online school improvement tool from CII is available for all schools as a choice and is required for priority and focus schools. • E-learning is a resource that can be leveraged by students and teachers. • SDDOE monitoring and provides technical assistance to LEAs with priority schools through the Academy of Pacesetting Districts.
Weaknesses, issues, lack of clarity	• Funding support for schools is mentioned through 1003a and 1003g funds, but it is not clear how much support this would be and whether it would be sufficient for the needs identified in the schools. • For focus schools, no evidence of timely and comprehensive monitoring and technical assistance from LEAs. • Weak exit criteria do not hold LEAs accountable for turning around priority schools. • The request describes heavy use of Indistar, however, some peers believed the SEA did not present evidence or a track record of the use of this system in a state similar to South Dakota. SDDOE does not adequately address if it has the tools or capacity necessary to implement this system. • The panel was unsure that SDDOE has the capacity to implement the support system, or if there is a robust system of differentiated support.

<i>Response Component</i>	<i>Peer Panel Response</i>
Technical Assistance Suggestions	• To avoid confusion, ensure that references to monitoring in section 2G relate to monitoring the implementations of the interventions in the priority and focus schools, not compliance monitoring of federal or state programs. In implementing monitoring, keep everyone on the same cycle as the federal requirement. • Consider carefully the resources and support that will need to be provided to districts and schools to implement the Indistar online tool. If the SEA begins with the priority and focus schools in the first year, then it should strongly consider not taking on any other schools during the first year and roll it out to other schools over a phased in cycle. • Clarify the differences from and any overlap in the SEA’s accreditation system and the consequences and support provided through the proposed accountability system.

Principle 2 Overall Review

Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• The school index factor rating systems includes elements appropriate to different levels of schools. The identification of schools as reward, focus and priority is based solely on rankings according to the school index. The interventions are not fully described and the exit criteria is based solely on raising the school's ranking level without specific consideration of academic growth, closing achievement gaps, or increasing graduation rates. • The request describes promising elements of the system, but it falls short specifically with subgroup accountability, as well as graduation rate. The AMOs as presented were unclear, specifically whether they will lead to differentiated responses. • The system seemed disjointed and it was unclear how all of the different approaches will work together to create a coherent and comprehensive system.
<i>Strengths</i>	• Pieces of the system were identified that can used in the overall strategy for improvement. • SDDOE recognizes the challenges confronting a large rural State.
<i>Weaknesses, issues, lack of clarity</i>	• The Academy of Pacesetting Districts needs to be used in the larger context of developing a set of concrete, focused actions designed to improve instructional leadership and classroom practices, whose results can be observed and measured in real time. • Similarly, the SDDOE needs to ascertain the readiness and capacity of the ESAs to support meaningful reform in the schools and districts. This is much more than an issue of ensuring that the ESAs have sufficient financial resources. If the ESAs lack the skill sets and systems (student achievement, HR, targeted student populations, etc.) to support the statewide implementation of the SDDOE's plan, then building these capacities has to become a priority for the SEA. • Parent and community involvement is characteristically a challenge in rural settings. However, in the SDDOE plan, it has not been fully developed.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• The Academy of Pacesetting Districts and the online tool Indistar provide tools to identify several key elements of reform, provide a structure for organizing the work, and provide a reporting system. These should be seen as part of the state's strategy to support low performing schools, but they will not be sufficient as the anchors of the strategy. The challenge for SDDOE is to build on this to find ways to provide support to districts and schools to actually make progress on school improvement. This means building the capacity of districts and schools to analyze data, differentiate instruction, understand and build principal leadership capacity, continually make improvements in pedagogy, and use student academic results as a basis for further analysis and for making instructional improvements, and for particularly targeting limited available resources in meeting the needs of underperforming groups such as students with disabilities, English language learners, and chronically under-performing students. • Consider using an intermediary support organizations (<i>e.g.</i>, ESA, IHE, national groups leveraging the Digital Dakota Network) to provide targeted support to LEAs and SEA to take on the multiple challenges posed by the ESEA flexibility request. • Specifically in the area of measuring student academic growth, SDDOE needs to draw on lessons learned and promising practices from other States and districts in the areas of both tested and non-tested grades and subject areas.

Principle 3: Supporting Effective Instruction and Leadership

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

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

If the SEA selected **Option A**:

If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3:

- i. Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, Option A.i Panel Response

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

Tally of Peer Responses: 0 Yes, 6 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	- Teachers and administrators have been at the table with the SEA during the development of these guidelines, including the South Dakota Education Association. The Charlotte Danielson Framework was proposed as the recommended State framework for teacher practice and the legislature approved this in July 2011, which provided the foundation for the South Dakota Framework for Teaching (South Dakota FFT). The 2012 Legislature will now have to approve the new evaluation system based on this framework. The work to pass similar standards for administrators is moving on a slower track, with the 2012 Legislature considering mandating the SDDOE to establish minimum professional performance standards for principals. - The guidelines are unlikely to be adopted by the end of the 11-12 schools year, but it is possible that the guidelines will be adopted in time to meet the implementation timeline of the flexibility.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	• The guidelines have been vetted through multiple groups and proposed to the legislature. The two-track approach of “Growing Knowledge” of these new standards as well as “Growing Skill” to design the new system is a useful approach to implementation as it will continue to engage stakeholders during the development process. Growing Skill phase has 12 pilot sites that begin using the South Dakota FfT in January 2012 and will complete this work in the summer (2012). Pilot activities include: ○ Introduction to the FfT ○ Crosswalk of district’s current standards and evaluation system to the FfT ○ Observation training ○ Individual coaching of evaluators ○ Train the trainer seminars • Pilot sites will adopt the FfT by August 2012. • Work groups around non-tested grades and subjects.
<i>Weaknesses, issues, lack of clarity</i>	• It does not appear that the guidelines for principal evaluation will be adopted by the end of the 2011-2012 school year. (HB 1234, introduced in the 2012 legislative session, requires school districts to evaluate the performance of each certified teacher on a statewide evaluation instrument, in order to receive state accreditation. The bill also directs the South Dakota Board of Education to promulgate administrative rules to establish minimum professional performance standards for certified principals and an instrument for principal evaluation that must be used by school districts.) • It was unclear how the FfT pilot sites were chosen.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• SEA should clarify what criteria were used to select the 12 district pilot sites of FfT. (For example, how did the SEA ensure a representative sample of LEAs? Also, what does the state hope to learn, specifically, from these pilot sites? How will it capture these data?) • Align principal and teacher evaluation systems. Ensure that principal guidelines are aligned to the newly defined teacher competencies. • The SEA may also want to be sure that certain options (peer review, use of student response surveys, etc.) are tested in at least some of the pilot sites. Any SEA non-negotiables across all sites will need to be clear. • Particularly at the secondary level with larger staff, performing a full appraisal of all staff annually is extremely challenging for principals. The SEA might consider the possibility of higher-performing staff being on a longer evaluation timeline. • Ensure that the Accountability Work Group is connected to and aligned with teacher and principal evaluation work groups.

- ii. Does the SEA’s plan include sufficient involvement of teachers and principals in the development of these guidelines?

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

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

Tally of Peer Responses: 6 Yes, 0 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Work groups specified in statute require teachers and principals to participate in developing the guidelines. A work group that included teachers and administrators met several times throughout 2010 to select the Charlotte Danielson standards as the basis for the State teacher evaluation system. Teachers and principals were also involved in the original Accountability Work Group that advised the SEA on the development of teacher and principal evaluation systems. Additional work groups are planned to further flesh out the teacher and principal systems moving forward.
<i>Strengths</i>	Senate Bill 24, which led the creation of this work, was developed in collaboration with the South Dakota Education Association.
<i>Weaknesses, issues, lack of clarity</i>	It is not clear that teachers with specific expertise in working with students with disabilities and English Learners were involved in this process.
<i>Technical Assistance Suggestions</i>	Be sure that future work groups focused on the teacher and principal evaluation systems include educators with specific expertise in working with students with disabilities and English Learners.

iii. *Note to Peers: Staff will review iii.*

If the SEA selected **Option B**:

If the SEA has developed and adopted all guidelines consistent with Principle 3:

- i. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

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

iii. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

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

3.A.ii Are the SEA’s guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.*, will they promote systems that:

a. Will be used for continual improvement of instruction?

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

3.A.ii.a Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

b. Meaningfully differentiate performance using at least three performance levels?

- *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?
- (i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- (ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- (iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

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

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
- *Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*
 - *Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

- f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

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

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	NA
<i>Strengths</i>	NA
<i>Weaknesses, issues, lack of clarity</i>	NA
<i>Technical Assistance Suggestions</i>	NA

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

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

3.B Panel Response*Tally of Peer Responses: 3 Yes, 3 No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	• HB 1234 contains other components related to teacher evaluation and support. Specifically, it would set up the ability for districts to reward teachers for efforts related to student achievement, teacher leadership and for the market-based needs of a district. In addition, it proposes several reasons for school boards to refuse to renew the contract of a tenured teacher, including a rating of “unsatisfactory” on two consecutive evaluations. Finally, it would eliminate continuing contract for new teachers entering the profession. Those who have already attained continuing contract status would be “grandfathered” in, should the bill pass. • SEA has a sample timeline, but is in a preliminary state of development.
<i>Strengths</i>	• The use of two separate pilots, a first on the guidelines and a second on implementing the system is a strength. • The establishment of work groups to guide the development of this work is a strength.
<i>Weaknesses, issues, lack of clarity</i>	• If the work group completes its work in November of 2012, it is unclear if any group of teachers/administrators will monitor the implementation and learning from the pilot. • It is unclear what tools districts will have at their disposal to aggregate quantitative and qualitative data from multiple sources and tie these data to specific sources of professional development. • A pilot to use the new appraisal system is planned in SY 2013-2014, but very little detail is provided on how many LEAs will participate, how they will be chosen, and how they will be evaluated. • Peers were concerned about the slower track for piloting principal evaluation. • The SDDOE needs a strategy for how it will measure growth for students in non-tested grades and subjects.
<i>Technical Assistance Suggestions</i>	• While the SEA has said that results from the 2013-2014 pilot will not be publicized, it seems reasonable to expect that some level of results will be subject to open records requests. (The SEA should prepare for this with a proactive strategy.) • Establish more detail on the how the 2013-2014 pilot will be run, and what types of information you are looking to gain as a result. If the end goal is a single system, that should inform how the pilot is constructed and run. The SEA should decide what kinds of questions it should be able to answer based on the pilot. • Strengthen professional development for both classroom teachers and supporting teachers of English Learners and students with disabilities to implement CCSS.

Principle 3 Overall Review

If the SEA indicated that it has not developed and adopted all guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option A in section 3.A, is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

If the SEA indicated that it has adopted guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option B in section 3.A, are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 4 Yes, 2 No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	While a great deal of work and thought went into the adoption of the Charlotte Danielson Framework, less thought and planning have been devoted to how the SEA will operationalize these standards into a statewide appraisal system. Additionally, while the State has now passed legislation requiring the development of standards for principal evaluation, the actual adoption of these standards will not be complete by end of the 2011-2012 school year, which is the deadline.
<i>Strengths</i>	• Stakeholder engagement, including the South Dakota Education Association (SDEA). • Work done to adopt the Charlotte Danielson Framework and related FfT pilot to use these standards at 12 LEAs.
<i>Weaknesses, issues, lack of clarity</i>	• Much more detail is needed on both proposed pilots. • It was unclear how the LEAs were chosen for the pilot. It is also unclear if the LEAs have already begun their work, and what the SEA expects to learn as a result. • Because the standards for the principal evaluation system have not yet been developed, the SEA will have less time to train principals and roll out this system in a graduated way as has been done with the teacher appraisal system.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	• Establish more pilot detail. • Any new appraisal system will have significant systems needs. This flexibility request should describe what capacity exists at the SEA and/or LEA levels to aggregate comprehensive data from multiple sources into a summative evaluation. Also, the SEA should leverage the work of the ESAs and the Academy of Pacesetting Districts to provide additional support to LEAs in the area of teacher and principal appraisal. • Consider “significant obstacles” and how they can be overcome. • The design of teacher and principal appraisal pilots should be done with great purpose and might include incentives for early adopters. Additionally, the SEA should develop a comprehensive evaluation plan for the questions it wants to answer in the pilots and the means for collecting these data. This should include surveys and focus groups. • Consider including teachers of students in non-tested grades, English Learners, and students with disabilities in the pilot. • Coordinate various working groups; make sure they feed into each other’s work. • Connect the evaluation result into professional development program and statewide systems of support. There are several vendor-developed systems that now do this. • Because a large portion of teachers work in non-tested grades and subjects, the SEA should explore the development of assessments in these areas so that all teachers can demonstrate how their work results in student improvement over time. • Because there is a great deal of teacher and principal appraisal work done throughout the country, the SEA may want to host a conference in which leading experts are invited to present their models to inform the ongoing development of the South Dakota plan.

Overall Request Evaluation

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

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	The SDDOE is making a serious effort to implement the CCSS, including attempting to build a robust professional development infrastructure supported by significant State financial investment. SDDOE is moving towards a continuous improvement model by creating an accountability system based on multiple measures. SDDOE is developing a single State teacher and principal evaluation system.
<i>Strengths</i>	• The teacher community has been actively engaged in the adoption of guidelines for practice (Charlotte Danielson Framework). • SDDOE recognizes that success at State, district and school levels is interconnected. • SDDOE is leveraging resources of membership in consortium and work with the CII to increase their capacity. • The State commitment to support capacity building as evidenced by the recent passage of the \$8.4 million budget.
<i>Weaknesses, issues, lack of clarity</i>	• Lack of attention and measurement of closing proficiency gaps among subgroups. • Lack of attention to teachers in non-tested grades and subject areas. • AMO strategy needs to be more understandable, easier to communicate and more manageable. • Fails to fully include English Learners in measuring achievement. • Supports and interventions for subgroups, including Native Americans, are not detailed. • Graduation rate accountability is weakened with the including of the completer rate.
<i>Technical Assistance Suggestions</i>	• See detailed technical assistance in previous sections.