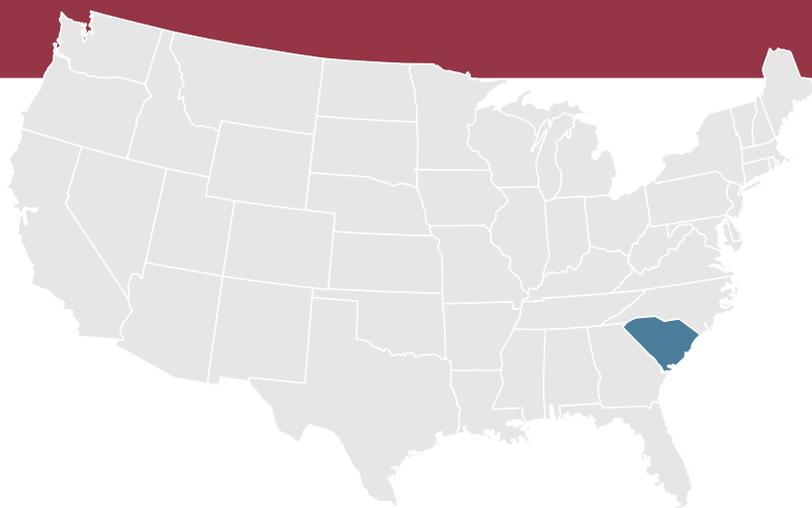# An Independent Review of ESSA State Plans

South Carolina

Project Overview

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

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

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

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

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

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Overall Strengths and Weaknesses

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

South Carolina's accountability system is built on indicators that are aligned with college and career readiness. The state deserves credit for including science and social studies in its accountability system, which will help signal the critical importance of a well-rounded education for all students. The state places a significant emphasis on the growth of schools' lowest-performing students. The state will also report the percentage of graduates who are college ready, career ready, or college and career ready.

South Carolina's accountability system goes above and beyond ESSA's minimum requirements for identifying schools for comprehensive support and improvement. As a result, it is likely that the state will identify a greater number of very low-performing schools.

In addition, its exit criteria for schools identified for comprehensive support requires schools to demonstrate some improvement rather than simply no longer qualify for the designation.

South Carolina deserves credit for taking a strong stance on the 95 percent assessment participation rate. The state counts untested students as a zero for determining achievement ratings. Schools that miss the participation requirement cannot receive the highest rating in achievement or in the summative rating. In addition, the state threatens the loss of Title I funds if the problem persists.

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

South Carolina's plan could be improved in a number of ways. The state's goals are overly complex and disconnected from the accountability system. The state's approach to awarding points and assigning corresponding ratings to indicators and schools is also unnecessarily complicated. In its current form, this approach likely overemphasizes high-performing students and runs the risk of overlooking or masking underperformance and achievement gaps. This is particularly likely because student subgroup performance is not included in the state's rating system.

South Carolina should provide greater detail about its plans to support and intervene in struggling schools. For example, the state says it plans to award all of its 7 percent set-aside for school improvement activities through a formula, but it does not specify how it would implement that formula. Moreover, the state would have had a stronger plan if it had used some portion of that money for competitive grants to the schools and districts with the strongest improvement plans. This step could materially improve the quality of interventions in identified schools. The state's identification criteria for targeted support schools and exit criteria both deserve further clarification and confirmation that sustained improvement is likely.

Plan Components

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

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

1	✓ 2	3	4	5

South Carolina sets a strong overarching vision by articulating a comprehensive "profile for a graduate" that includes world-class knowledge, world-class skills, and life/career characteristics. While the vision is aspirational, it is not easy to measure against student performance. The goals the state proposes to meet that vision are overly complex, the time span is long, and there is some ambiguity about the interim target numbers. Finally, it does not appear that performance against the goals matters in the state's accountability system.

The state's long-term goal is for 90 percent of students to graduate ready for college, career, and citizenship by 2035. To meet this goal, it sets two different academic goals. The first is for 90 percent of students to score at level 2 or higher on the statewide assessments in English language arts and mathematics by 2035. The second is for 70 students of students to score at a level 3 or higher. According to the discussion of the state's assessment system in the plan, it is a level 3 or higher that corresponds with college and career readiness. A level 2 corresponds to a D for high schools and is below meeting expectations for elementary and middle schools. As such, it is difficult to reconcile South Carolina's goals with its overarching vision. More specifically, a goal of 90 percent of students performing at the level of a D or better is hardly aspirational.

The state may want to consider eliminating the 90 percent goal and focusing on the 70 percent goal of performance at level 3. Having only one goal would be clearer for stakeholders. Moreover, a 70 percent goal of performance at level 3 would be a remarkable achievement considering that only 2 percent of schools currently have at least 70 percent of students performing at this level in both English language arts and mathematics.

The state also sets midway targets. For the first goal, the state set midway goals of reducing by 50 percent the percentage of students scoring at level 1 by 2026. For the second, the midway goal is to reduce by half the students scoring below level 3 by 2026. It is positive that this approach set the same goals for all student groups, with an obvious and ambitious focus on gap closure and high expectations for all schools and districts. This plan will require serious focus and resources to achieve the gap closure that will be required.

Beginning with the graduating class of 2020, the state, each district, and each high school aim to increase by 5 percent annually the percentage of students who graduate ready for postsecondary schools or credentials without remediation. It is unclear why the state waits until the class of 2020 for this goal to begin. The plan also lacks details describing how this goal fits among the many other state goals.

South Carolina's graduation-rate goal is to increase its four-year adjusted cohort rate to 90 percent. The midway target is to reduce the number of students who did not graduate on time in half, based on 2017 data, by 2026. Those schools or student subgroups who have already met the 90 percent threshold must set other ambitious goals. It is unclear what would qualify as "ambitious" in this context. As with its achievement goal, South Carolina also will set three-year interim targets for graduation rates based on the 90 percent goal.

South Carolina proposes two English language proficiency goals. The first is by 2035 for 70 percent of English learner students to meet or exceed their individual growth targets on the ACCESS 2.0 assessment. The interim target is to increase by half the percentage of students meeting their targets by 50 percent by 2026. It is difficult to know whether this goal is ambitious and achievable without additional context on past performance. The second goal is for 70 percent of English learners to reach proficiency within five years.

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

| 1 | 2 | ✓ 3 | 4 | 5 |

South Carolina is in the midst of a transition on its assessments and will have fully transitioned by 2018. Its assessments are aligned to its standards, which are in turn aligned to college- and career-readiness benchmarks. The plan clearly explains its standards-setting process and how it aligned the new assessments to the standards, but it is too early to tell if its assessments and standards alignment will set students up for success.

Despite identifying five languages other than English that are present to a significant extent among its student population, South Carolina does not provide any assessments in a language other than English or seemingly any accommodations to English learner students. The state argues that, since instruction is in English, assessments must be as well for results to be valid. The state would strengthen its submission by articulating more robust plans to accommodate English learners.

For its English proficiency assessment, South Carolina will use the WIDA ACCESS test, which is aligned to college- and career-readiness benchmarks.

The state should strengthen its plan by ensuring that it has a process in place to meet the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities. Furthermore, the state should provide more information about its alternative achievement standards and aligned assessments for students with the most severe cognitive disabilities.

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

| 1 | 2 | ✓ 3 | 4 | 5 |

South Carolina's selection of indicators and weights (with the exception of English language proficiency) are generally strong, but there are concerns about how performance on the indicators translates into an overall rating for schools.

South Carolina's academic performance indicator is based on student achievement on the statewide assessment in English language arts and mathematics in grades 3 through 8, as well as end-of-course exams for Algebra I and English I in high schools. The state will use a complex performance index to assess school performance across all indicators, which may make it difficult to compare across schools and could mask the achievement of lower-performing students.

The balance between academic and non-academic indicators is high at 90-10 in elementary and middle schools and 95-5 in high school.

The state will include a student growth measure in elementary and middle schools. Additionally, these schools will be evaluated on the state's "preparing for success" indicator, which is based on students' performance on science and social studies assessments.

In lieu of a growth measure in high schools, the state will use an indicator that assesses students' college and career readiness. This measure is based on meeting any one of nine state-identified college- and career-readiness criteria. While these "menu" items could encourage schools to offer well-rounded curricula and meet student needs in a variety of ways, it may also pose a challenge to compare schools. It appears this calculation will be based on the number of students in the 12th-grade graduation cohort, which will inflate the percentage of students graduating college/career ready because it omits students who have dropped out. The measure would be stronger if South Carolina were to modify the calculation and apply it to the 9th-grade cohort (akin to the state's calculation of the adjusted cohort graduation rate). Additionally, the state should monitor its data to determine whether all of its options are comparable or whether certain types of students are tracked into specific pathways (i.e., low-income students or students of color disproportionately tracked into career prep pathways vs. college prep pathways).

To measure school quality, the state will also use a student engagement survey that, after its pilot, will constitute 10 percent of a school's rating. South Carolina should monitor its survey results to ensure they are valid and reliable enough to play a significant role in school ratings.

English language proficiency indicator targets are crafted in a linear way, which does not truly reflect that students come into the system at different points (proficiency levels, ages, grades, etc.). For example, the current plan appears to allow four years for a student entering at a level 4 to grow to a level 4.4. We recommend revisiting this section to clarify how initial age/grade or proficiency level is taken into account in setting student targets. In addition, this section should clarify what level of growth will be required based on the state's five-year timeline.

The peers also raise concerns regarding the Effective Learning Environment indicator. Specifically, the proposed plan states that students taking the alternative assessment may be excluded from this indicator based on the determination of the IEP team. There is no statutory allowance for this; the state must ensure that all students are accounted for within this indicator.

Finally, indicator point totals will be translated into one of five ratings: unsatisfactory, below average, average, good, and excellent. It is quite unclear how points are translated into a rating. The state provides ample data regarding the normative performance of schools. However, peers are concerned that the rating system appears completely normative. This is problematic because ratings could be misleading for parents and the public. For example, a school could receive a rating of excellent, but still perform below the state's goals.

Although the bands are different for high schools than for elementary and middle schools, each is assigned a range of scores. Based on the plan, it is unclear how they selected those bands. Given the percentage of schools falling into each category, it appears to be a relatively normal distribution, except that it's skewed to the high side. For example, only 5 percent of schools are unsatisfactory compared with 15 percent that are excellent. In high school, the lowest band is roughly 5 percent; however, the highest band is 25 percent. This suggests that South Carolina may have set the cut score so that it only identifies the bottom 5 percent of schools. Interestingly, this construction results in only roughly 20 percent of schools scoring below average.

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

| 1 | 2 | ✔ 3 | 4 | 5 |

In its performance index, South Carolina will weight student growth comparably to academic achievement and will give significant weight to both. However, neither measure places much weight on students reaching grade-level standards. To measure achievement, South Carolina plans to use a performance index that rewards performance at all levels, but especially for students scoring at the highest levels. The particular points system South Carolina has chosen de-emphasizes the proficiency threshold and may result in overlooking or undervaluing underperforming students.

Using an achievement index like this is not problematic in itself, but South Carolina's growth model is also not aligned to grade-level expectations. To measure growth, South Carolina will use the Education Value-Added Assessment System (EVAAS). This growth model compares student growth in a school to the average historical growth of similar students statewide. While it is positive that the state elected to use a growth model in its accountability system, this approach is a relative measure. In other words, it assesses how well some students perform compared with similarly situated students, regardless of how much progress they make toward grade-level standards. Half of the growth points in the accountability model will come from growth of all students school-wide, and the other half will come from growth demonstrated by the bottom quintile of students. This latter component will essentially double-count lower-performing students, encouraging schools to focus on growth for the lowest-performing students and sending a signal to school personnel to allocate resources to this key subset of students.

This is the first time that South Carolina will use a student growth measure in its accountability system. As such, it will be important for the state to ensure that educators and parents can understand the measure, identify the students in the bottom quintile, and know how to respond.

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

1	✓ 2	3	4	5

South Carolina's rating system does not specifically take into account the performance of student subgroups. The state's growth measure, which applies to elementary and middle schools, is split 50-50 between the growth of all students and the growth of the bottom quintile. This approach will encourage schools to prioritize the academic growth of its lowest-performing students; still, it does not specifically incorporate student subgroups.

The state will identify schools with three consecutive years of a consistently underperforming subgroup for targeted support. Due to this approach, the first schools will not be identified for this designation until November 2020. This approach is too slow and appears to run counter to federal rules, which require the first group to be identified in 2018-19. Moreover, a subgroup must be two standard deviations below the state's average performance for the subgroups for three consecutive years. Absent additional data on the number and percentage of schools that would be identified using this methodology, this appears to be a very low bar. Moreover, measuring subgroup performance against itself lowers the expectations for historically underserved students.

South Carolina does, however, deserve credit for taking a strong stance on the 95 percent assessment participation rate. The state counts untested students as a zero for determining achievement ratings. Schools that miss the participation requirement cannot receive the highest rating in achievement or in the summative rating. In addition, the state threatens the loss of Title I funds if the problem persists.

South Carolina should be commended for reducing its n-size, the minimum group size used to determine if schools should be held accountable for the performance of subgroups, from 30 to 20 students. The state provided evidence demonstrating how this new approach will help to ensure that more student subgroups count in the state accountability system. The state should, however, consider expanding the number of racial and ethnic categories to include American Indian/Alaska Native and biracial.

The peers raise concerns regarding the inclusion of students with disabilities within the accountability systems. Specifically, students taking the alternative assessment may be excluded from one of the indicators (i.e., Effective Learning Environments). In addition, the achievement indicator for the SC School for the Deaf and Blind comprises both the statewide assessment and performance on IEP goals, but it's unclear if IEP goals meet the federal requirements for accountability indicators.

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

| 1 | 2 | ✓ 3 | 4 | 5 |

South Carolina's policy to identify schools for comprehensive schools is strong. However, the state's targeted support policy warrants further attention.

Every three years, South Carolina will identify schools for comprehensive support if they meet one or more of the following criteria: a Title I school performing in the bottom 10 percent of all schools; non-Title I schools disaggregated by grade span performing in the bottom 10 percent; a high school with a four-year graduation rate below 70 percent; or a Title I school with at least one chronically low-performing subgroup. Chronic subgroup underperformance is defined as a group of students performing below the all-students category of the highest-performing Title I school identified for comprehensive support over the previous two identification cycles. The state should be applauded for identifying more schools for comprehensive support than is required under law.

The state's approach to identifying schools for targeted support is potentially strong, but it has a few elements that could limit its reach. The state says it will identify schools with underachieving subgroups who perform in the bottom 10 percent across all indicators for three consecutive years. This is the equivalent of a student underperforming throughout the entirety of middle school. In addition, it's concerning that schools will only be identified based on performance across all indicators, which will have the effect of requiring students to fail on every indicator before the school is identified for improvement. The state should consider identifying schools both for low performance on all indicators and very low performance on a single indicator. The state could also strengthen its plan by presenting data on the number and types of schools these rules would identify.

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

| 1 | 2 | ✓ 3 | 4 | 5 |

South Carolina has developed a Tiered Support and Intervention Matrix to guide the implementation of improvement strategies based on a school's relative need. Schools are assigned a tier from 1 to 4 based on key elements within the school. These tiers correspond with interventions and supports the school improvement team will pursue to raise achievement in that school. The higher the tier, the less autonomy and more evidence required to support the intervention.

South Carolina also will conduct resource allocation assessments, and then offer recommendations for improvement based on need and circumstance. The state plan also lays out a system for support for school districts with significant numbers of schools that are identified for improvement.

However, the state does not provide sufficient detail to fully understand how it will support schools. It is positive that the state encourages evidence-based interventions, but much more information is needed than the descriptions provided to be confident that these efforts will translate into actual support that improves outcomes for students.

South Carolina plans to distribute the 7 percent of Title I funds set aside for school improvement efforts through a formula rather than a competitive process designed to identify the most promising plans. In its plan, the state does not specify the formula, or how it will ensure this money is well spent. The state should consider using a competition to ensure funds are used to support high-quality plans. In addition, South Carolina should consider using the 3 percent Direct Student Services set-aside to reinforce school-improvement efforts.

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

| 1 | 2 | ✓ 3 | 4 | 5 |

The peers felt that South Carolina's exit criteria for comprehensive support was strong; however, the targeted support exit criteria policy warrants improvement.

The exit criteria for comprehensive support schools is strong in that it incorporates improvement beyond simply surpassing the entrance criteria. Specifically, a growth rating of "good" is required. In addition, at the high school level, an increase in graduation rates alone is insufficient—the increase in graduation rate must be accompanied by an increase in college and career readiness. Schools must also demonstrate a 3 percent increase in achievement. However, it is unclear whether the state requires a 3 percent or 3 percentage point increase. A 3 percentage point increase is a higher bar and therefore a more desirable improvement threshold for schools to exit identified status.

Unfortunately, the exit criteria for targeted support schools is not as strong. Students merely need to perform above the all-students level among the lowest-performing 5 percent of schools. While additional data would be helpful to confirm, this appears to be a fairly low bar that may result in the repeated identification of schools.

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

| 1 | ✓ 2 | 3 | 4 | 5 |

In its plan, South Carolina provides some general information about its continuous improvement activities. For example, the state plans to evaluate annually the results of the district strategic plans to assess the effectiveness of interventions. This could eventually be positive, but it is difficult to tell from the plan.

The state should review its data to ensure that schools with low-performing subgroups do not receive high ratings, and consider modifying the state's rating system if this is a problem. In addition, the state should review its data to see if schools with low-performing subgroups are not identified because their identification criteria are modest.

South Carolina should consider developing a formal feedback loop for educators, school and district leaders, and stakeholders to provide feedback on how the plan is going and how it might be improved. Furthermore, the state should develop a process to engage with community and other stakeholders as well as a process to routinely work with a diverse set of stakeholders to improve its plan.