WHEN EQUITY IS
OPTIONAL

HOW STATE CHOICES AFFECT SCHOOL RATINGS AND IDENTIFICATION FOR SUPPORT UNDER ESSA

ESSA

ACCOUNTABILTY RESULTS

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ABOUT US

The Alliance for Excellent Education (All4Ed) is a Washington, DC–based national policy, practice, and advocacy organization dedicated to ensuring that all students, particularly those underperforming and those historically underserved, graduate from high school ready for success in college, work, and citizenship.

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The nation's top education leaders—across time and partisan divides—have called for all students to be able to access an excellent education regardless of where they live. U.S. Secretary of Education Betsy DeVos says she "believes that neither the ZIP code in which a child lives nor a child's household income should be the principal determinant of his or her opportunity to receive a world-class education."[1] Former Secretary of Education John King feels similarly, stating that "ensuring a quality education for students regardless of ZIP code is critical."[2]

However, under the Every Student Succeeds Act (ESSA), it is clear that the state in which a student lives, as well as his or her ZIP code, matters a great deal. For example, a Florida school is much more likely to be identified for support than one in Michigan. Students in a low-rated Mississippi school are less likely to receive extra resources provided under ESSA than students in a low-rated Louisiana school, and an A school in Arizona is more likely to have an underperforming group of students than an A school in Ohio.

ESSA promised a more flexible system of school accountability, and initial results show that the law delivered on its promise. Unfortunately, more flexible accountability systems and more equitable ones often conflict. States have used ESSA's flexibility to take such varied approaches that students in low-performing schools—who are more likely to be students of color[3] or from low-income families—in *different states* have very *different odds* of receiving the supports they need to improve. Furthermore, some states are sending mixed signals about school performance to families and the public; systems for rating school quality are not consistently aligned with systems for providing supports to low-performing schools.

Our analysis of ESSA accountability results in 10 states revealed significant variations in implementation from state to state, including four notable trends:

✔ School ratings skewed slightly high.

✔ The likelihood that a school was identified for support varied by state.

✔ Low-rated schools were often overlooked for support.

✔ High-rated schools were rarely identified for support.

These trends reflect the first year of ESSA implementation (usually school ratings and identifications from the 2018–19 school year, based on 2017–18 data). A few states updated their approaches in the second year of implementation, but that was before unprecedented disruptions to education wrought by COVID-19.[4] Following statewide school closures, the U.S. Department of Education allowed states to cancel spring 2020 assessments and "pause" their accountability systems. No new schools will be identified for support in the fall of 2020.[5]

> **Under the Every Student Succeeds Act (ESSA), it is clear that the state in which a student lives, as well as his or her ZIP code, matters a great deal.**

However, learning losses and trauma stemming from the pandemic are likely to disproportionately affect students of color, students from low-income families, English learners, and students with disabilities.[6] As a result, it is now imperative for states to reevaluate their accountability systems to ensure that they measure and prioritize the needs of these students and direct supports to the schools that serve them. Where current systems fall short, state leaders should use this temporary "pause" to make their systems more equitable.

FLEXIBILITY VERSUS EQUITY: ACCOUNTABILITY UNDER ESSA

When Congress passed ESSA in 2015, many of the law's proponents touted its flexibility in how states identify low-performing schools and help them improve. Rather than federal mandates or prescriptive turnaround models, ESSA gives states greater leeway to tailor their accountability and school improvement systems to fit local needs.

However, ESSA constrains that flexibility with guardrails—namely provisions which ensure that families have clear information about school performance and that states and districts intervene if schools do not serve all students well, especially historically underserved students. Under ESSA every state must:

✔ **annually meaningfully differentiate** schools (e.g., assign school ratings) based on multiple indicators, including academic achievement in English language arts (ELA) and math, high school graduation rates, and the progress of English learners toward achieving English language proficiency (ELP);

✔ identify schools for **comprehensive support and improvement (CSI)** at least once every three years, including schools in the bottom 5% of Title I schools statewide and high schools with graduation rates below 67%; and

✔ annually identify schools for **targeted support and improvement (TSI)** that have one or more "consistently underperforming" groups of students, including schools needing **additional targeted support (ATS)** because a group of students performs as poorly as students in the bottom 5% of Title I schools identified for CSI.[7]

Despite these provisions, the wide range of policies in state ESSA plans suggest that ESSA's flexibility is stronger than its guardrails to ensure equitable implementation.[8] Yet when ESSA plans were being developed and approved by the U.S. Department of Education, advocates and analysts could only *speculate* about the degree to which ESSA's expanded flexibility might lead to disparate results across states. Now that states have implemented their new accountability plans and identified schools for support, there is *evidence* of the degree to which states have diverged under ESSA and how these distinctions exacerbate inequities.[9]

EARLY EVIDENCE FROM ESSA IMPLEMENTATION

The four findings below, based on the first year of ESSA implementation in 10 states, consider school ratings and schools identified for CSI or TSI (including ATS)—particularly the degree of alignment between ratings and identification status.[10] (See the appendix, "**States' Methodologies to Identify Schools for Support**," for a description of state approaches.) For example, if a state gives a school the highest overall rating—marking it as among the best in the state—it would be misleading for the school to also be identified for TSI. School ratings and lists of schools identified for support should send reinforcing signals to families, educators, administrators, advocates, and the public.

> **It is now imperative for states to reevaluate their accountability systems to ensure that they measure and prioritize the needs of these students and direct supports to the schools that serve them.**

Moreover, a mismatch between school ratings and identification status not only confuses families but also carries consequences for students in need of extra help and resources. Identified schools must develop improvement plans with at least one evidence-based intervention, and *only identified schools are eligible to receive additional Title I funds* set aside by the state for school improvement (known as the "7% Title I set-aside"). If schools receive very low ratings but are not identified, students in those schools cannot benefit from the set-aside funds—or the extra attention, coaching, and assistance from their district or state that comes with them.

FIGURE 1: WHAT PERCENTAGE OF SCHOOLS RECEIVED EACH RATING?

☑ Note

*In general, the schools included in each state's data set are schools that received a rating in the accountability system and/or were identified for CSI or TSI (including ATS).

■ A and B Schools
▦ C Schools
▦ D and F Schools
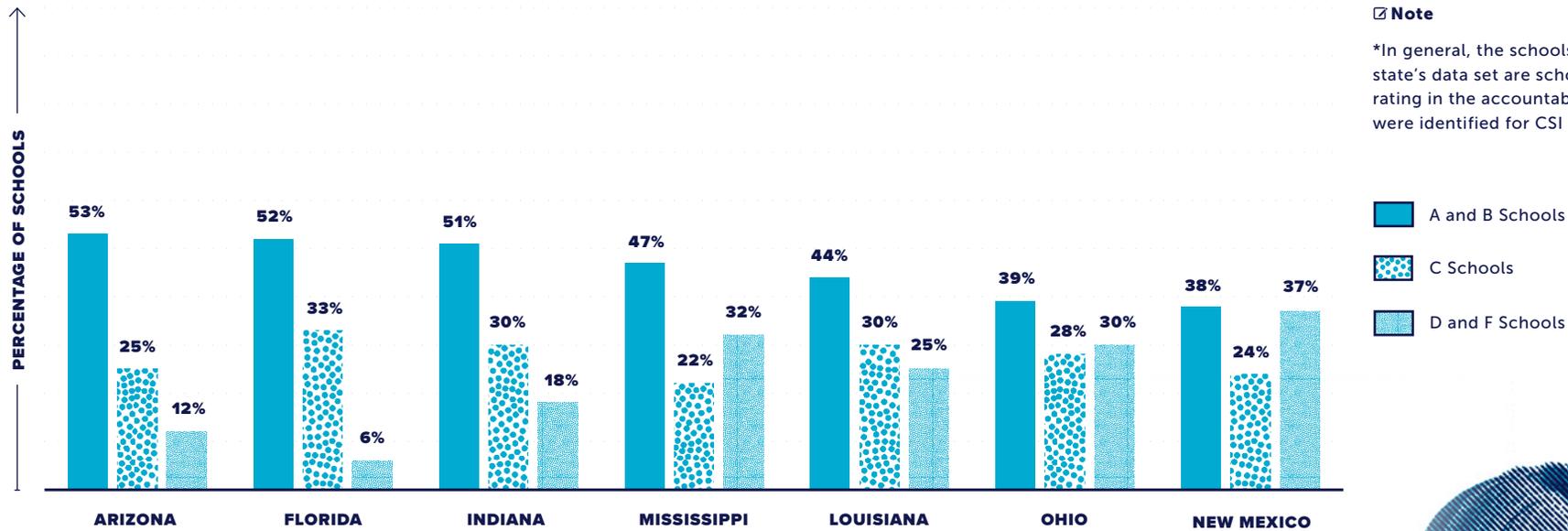
Among the seven states in our data set that rated schools using A–F grades:

☑ Fewer than **one-third** of schools received a D or F grade in every state but **New Mexico.**[11]

☑ In three states (**Arizona, Florida,** and **Indiana**), a **majority** of schools received an A or B grade.

Given limited capacity to support schools identified for improvement, states may have been judicious about designing systems that gave large numbers of schools a D or F grade if they also adopted a decision rule in which low-rated schools are identified for support automatically. Arizona, Indiana, and Louisiana all identified CSI schools in this way. However, these decision rules vary. For example, some states require a school to have multiple years of low grades to be identified for support or identify only F schools, not D schools, for CSI by rule.
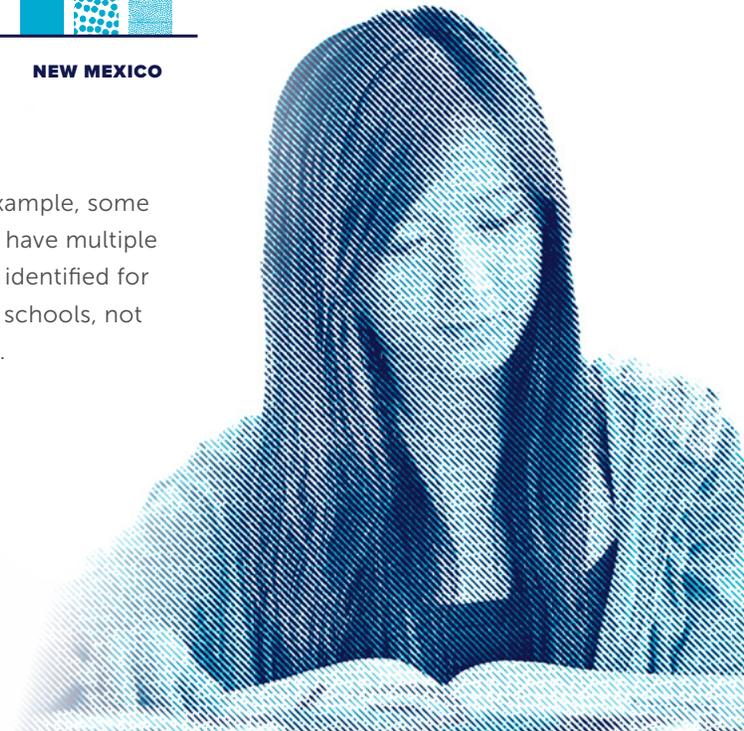
Across the 10 states, the percentage of schools identified for support under ESSA diverged significantly:

☑ **69%** of **Florida** schools identified vs. 4% of **Connecticut** schools identified

☑ **21%** of **Louisiana** schools identified for CSI vs. 3% of **Connecticut's** schools identified for CSI

☑ **54%** of **Florida's** schools identified for TSI vs. 1% of **Connecticut's** schools identified for TSI

In particular, Connecticut designed a system that dramatically limited the number of identified schools, especially for TSI. As a result, *only nine schools* (or 1% of Connecticut schools) were identified as needing to provide support to an ESSA-required student subgroup,

like Black students. (For an explanation of how Connecticut's system resulted in so few TSI schools, see "How Connecticut Took Advantage of ESSA's Flexibility to Limit TSI Identification").

On the other hand, the percentage of schools identified was especially high in Florida because the state identifies all schools receiving a D or F grade for CSI, and then identifies TSI schools from those receiving a C or better.[12] The percentage of schools identified in Florida and Indiana may even expand in future years, as both states were waiting for additional years of data to identify schools with "consistently underperforming" subgroups for TSI. All TSI schools in both states were identified using the state's methodology to identify ATS schools. (See the appendix, "**States' Methodologies to Identify Schools for Support**," for more detail.)

FIGURE 2: HOW MANY SCHOOLS WERE IDENTIFIED FOR SUPPORT?

Legend:
- TSI Only (including ATS)
- CSI Only
- Both CSI and TSI (including ATS)

PERCENTAGE OF SCHOOLS →

State	TSI Only	CSI Only	Both CSI and TSI
FLORIDA	54%	15%	
*ARIZONA	38%	7%	2%
WASHINGTON	32%	12%	
*LOUISIANA	17%	14%	7%
OHIO	18%	8%	
NEW MEXICO	13%	11%	
*INDIANA	14%	5%	3%
MISSISSIPPI	18%	4%	
MICHIGAN	4%	4%	
CONNECTICUT	1%	3%	
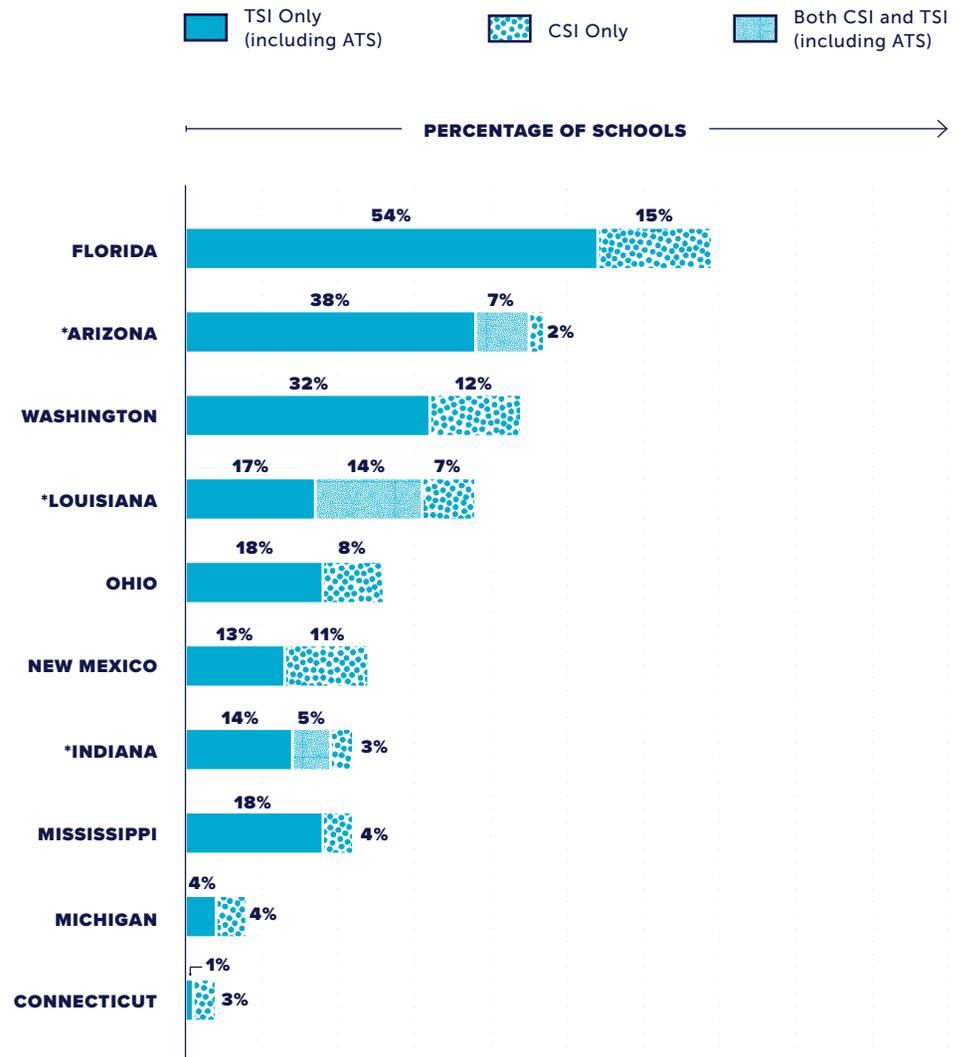
☑ **Note**

*Schools can be identified for comprehensive and targeted support at the same time.
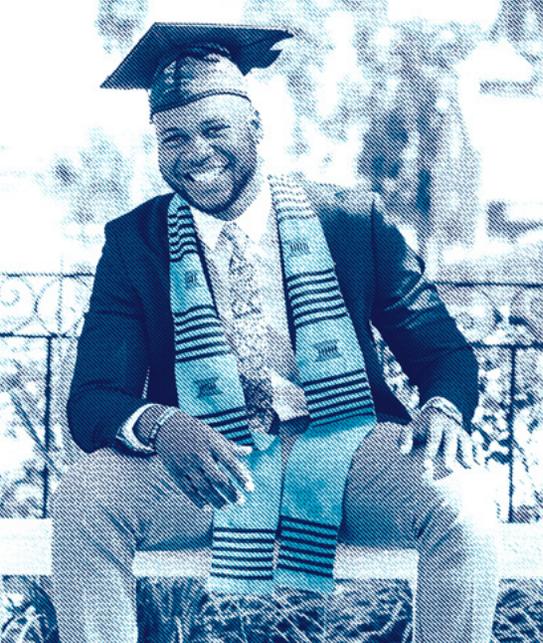
ARE STATES LIMITING TSI SCHOOLS?
Advocates for historically underserved students, including All4Ed, have been concerned that states would limit the number of schools identified for TSI by using a definition of a "consistently underperforming" subgroup of students that is the same as ESSA's definition of a school needing ATS (i.e., a subgroup performing as poorly as students in the bottom 5% of Title I schools identified for CSI). Among the 10 states in our analysis, however, we found scant evidence that using the same definition led to states identifying fewer TSI schools. Of the states that use the same definition for ATS and TSI schools (Arizona, Louisiana, New Mexico, and Washington), three were among the top four states overall in our analysis in terms of the percentage of schools identified for TSI. Furthermore, Arizona, Louisiana, and Washington all identified a greater share of their schools for TSI than any of the states we examined that used distinct definitions to identify TSI schools apart from ATS schools (Michigan, Mississippi, and Ohio). **This is due, in part, to the myriad other ways states can use ESSA's flexibility to limit TSI identification.** For example, Mississippi caps the number of schools eligible to be identified for TSI at 5% of the total number of schools statewide, while Ohio selects ATS schools exclusively from schools that are not already identified for either CSI or TSI.

HOW CONNECTICUT TOOK ADVANTAGE OF ESSA'S FLEXIBILITY TO LIMIT TSI IDENTIFICATION

Connecticut identified fewer schools for TSI than any other state we analyzed. Here's how:

1   ESSA permits states, with few parameters, to determine what it means for a group of students to be "consistently underperforming" and needing TSI. Connecticut defined a group of students as "consistently underperforming" if it performed in the bottom 1%, for three consecutive years, on every indicator in its accountability system. (Connecticut used 12 indicators, ranging from ELA and math performance and growth to participation in state tests, physical fitness, and access to arts and music.) **This definition of a "consistently underperforming" group of students was so restrictive that Connecticut failed to identify even a single school that met it.**

2   The state created a second definition to determine if a combined, "high-needs" super-subgroup of students (including all students from low-income families, English learners, and students with disabilities in a school) had low achievement, growth, or graduation rates and warranted identification in a state-specific category called "Focus" schools. ESSA allows states to consider the performance of super-subgroups of students, but only in addition to the individual groups of students required by the law (e.g., students from racial/ethnic groups). Because Connecticut identified zero schools using its "consistently underperforming" definition, **"Focus" schools were not a supplement to schools with "consistently underperforming" subgroups—they were a replacement.**

3   ESSA also permits states to identify schools for ATS from schools that already are identified for TSI. Since Connecticut had no TSI schools with "consistently underperforming" subgroups, the state identified ATS schools exclusively from its list of 20 "Focus" schools. As a result, **only nine schools (or 1%) were identified as needing to provide additional support to an ESSA-required subgroup of students,** including two schools for Black students and one school for Latino students.

While Connecticut's process may not violate ESSA's legal requirements, the outcome—only nine schools identified for individual subgroup performance—violates the intent of the numerous ESSA provisions meant to ensure support for subgroups and reveals significant weaknesses in ESSA's equity guardrails.

Many low-rated schools were not identified and, thus, cannot receive extra federal funds (via the 7% Title I set-aside) to help their students improve. This was true in states using A–F grades and those relying only on an index, but the problem was most pronounced in certain states.

☑ **80%** of **Michigan** schools in the bottom 5% of the index,

☑ **43%** of **Mississippi** F schools, and

☑ **37%** of **Connecticut** schools in the bottom 5% of the index were overlooked.

Given that states are expected—at minimum—to identify the bottom 5% of Title I schools for CSI, it is alarming that four out of five schools in the bottom 5% of the state's accountability index in Michigan went unidentified. Likewise, even though both Mississippi and Florida use A–F school grading systems with many similar components, those similarities ended when the states chose very different ways to identify schools. The high percentage of overlooked schools with the lowest ratings is all the more troubling given that historically underserved students are more highly concentrated in these schools.[13]

Understandably, the percentage of low-rated schools overlooked for support relates to the percentage of schools identified overall: States that identified a greater share of their schools tended to overlook fewer low-rated schools.

However, there were exceptions. For example, Indiana identified 22% of its schools for support—the third-lowest percentage among states we examined—including all but 2% of its F schools.[14] This means that nearly all Indiana F schools developed a school improvement plan and were eligible to receive additional Title I funding to implement it. Because Indiana consistently identified its lowest-rated schools, students attending them were more likely to get the help they needed. Meanwhile, Mississippi, which also identified 22% of schools, excluded 43% of its F schools from improvement. Mississippi students in these schools, who are predominantly Black and from low-income families, have no chance to reap the benefits and resources from the Title I set-aside for school improvement or available state technical assistance for identified schools.

☑ **Note**

*Schools receive points but no overall rating. The analysis is based on schools scoring in the 5th percentile and bottom quartile, respectively.

FIGURE 3. WERE SCHOOLS WITH LOW RATINGS OVERLOOKED FOR SUPPORT?

F Schools (*Bottom 5%)   D Schools (*Bottom Quartile)

PERCENTAGE OF SCHOOLS

*MICHIGAN — 80%
MISSISSIPPI — 43%
*CONNECTICUT — 37%
NEW MEXICO — 25%
LOUISIANA — 11%
OHIO — 5%
INDIANA — 2%
ARIZONA — 2%
*WASHINGTON — 0%
FLORIDA — 0%

*CONNECTICUT — 83%
*MICHIGAN — 74%
MISSISSIPPI — 73%
NEW MEXICO — 70%
INDIANA — 47%
OHIO — 43%
ARIZONA — 21%
LOUISIANA — 19%
*WASHINGTON — 12%
FLORIDA — 0%
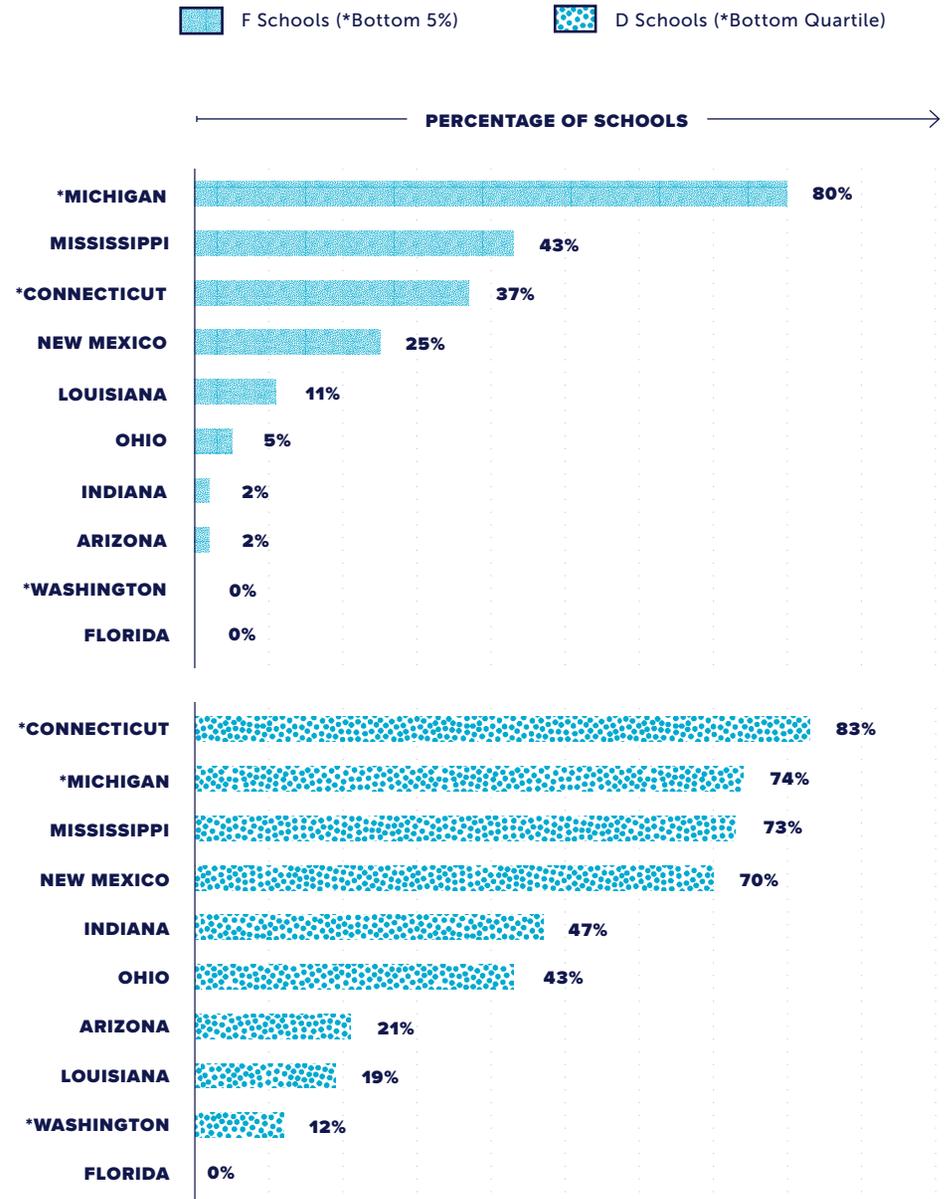
States often sent mixed signals by not identifying low-rated schools, but rarely by placing top-rated schools in TSI. In other words, few schools with high ratings also had a "consistently underperforming" group of students. Florida and Arizona were notable exceptions.[15]

☑ **<5% of A schools were identified for TSI in all states but Florida (25%) and Arizona (8%).**

☑ **<15% of B schools were identified for TSI, except in Florida (71%), Arizona (40%), and Mississippi (18%)—though the share of B schools identified for TSI tended to be higher in all states we examined.**

☑ **<1% of schools that received an A or B were identified for TSI in Ohio and New Mexico—two bright spots.**

Similarly, few schools with high ratings (an A or B grade, or among the top quartile of schools in states that used an index) were identified for CSI in any state in our analysis. When states did identify highly rated schools for CSI, they often had low graduation rates. For example, New Mexico identified 2% of A schools and 3% of B schools for CSI, the highest percentage in our data set. All were high schools with low graduation rates.

Further analysis is needed to determine whether high overall ratings masked low performance among historically underserved students. Our analysis found that schools with high ratings were rarely identified for support due to low overall performance or "consistently underperforming" groups, something we consider to be a positive finding. However, because some state systems for rating and identifying schools may exclude disaggregated data and/or overlook large numbers of low-performing students, we plan to evaluate school ratings and identification against subgroup achievement and graduation rates to further gauge how well school accountability systems reflect the performance of historically underserved students.

FIGURE 4. DID HIGH RATINGS CONFLICT WITH SCHOOL IDENTIFICATION?
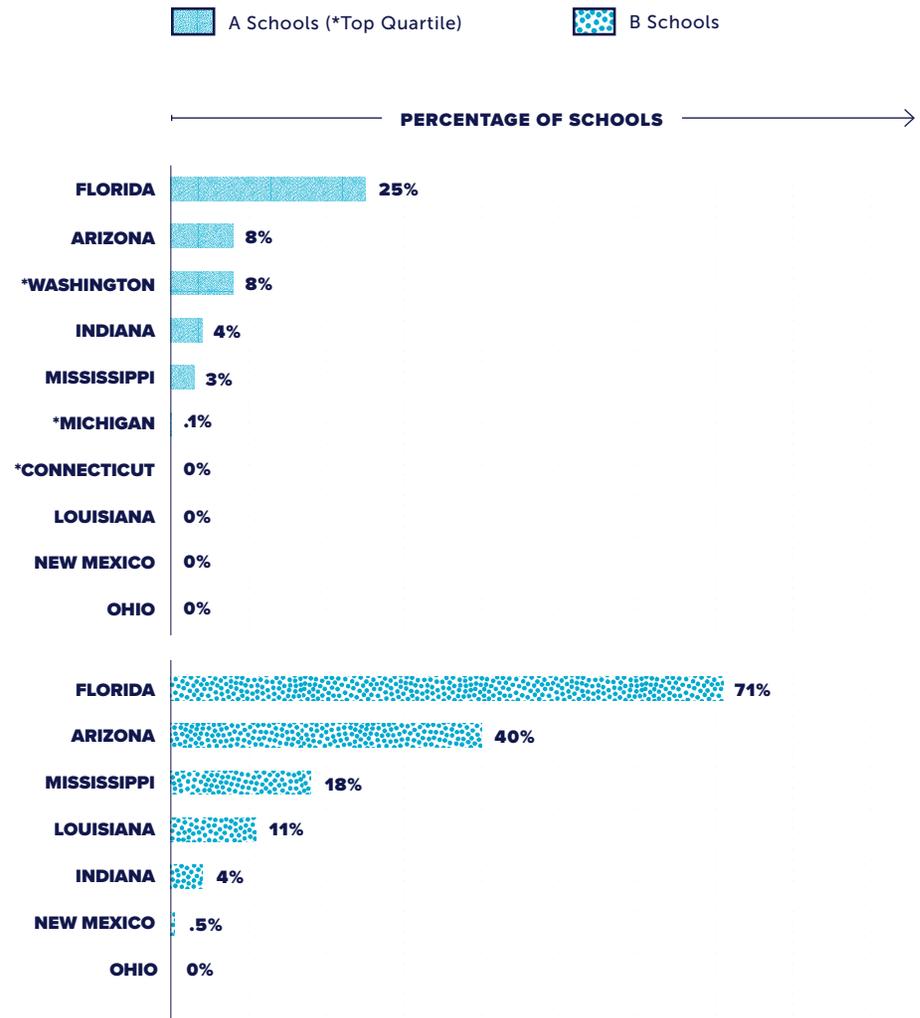
A Schools (*Top Quartile)   B Schools

PERCENTAGE OF SCHOOLS →

FLORIDA — 25%
ARIZONA — 8%
*WASHINGTON — 8%
INDIANA — 4%
MISSISSIPPI — 3%
*MICHIGAN — .1%
*CONNECTICUT — 0%
LOUISIANA — 0%
NEW MEXICO — 0%
OHIO — 0%

FLORIDA — 71%
ARIZONA — 40%
MISSISSIPPI — 18%
LOUISIANA — 11%
INDIANA — 4%
NEW MEXICO — .5%
OHIO — 0%

☑ **Note**

*Schools receive points but no overall rating. The analysis is based on schools scoring in the highest quartile only.

LOOKING AHEAD: CAN FLEXIBILITY PROMOTE EQUITY?

While our data reveal several trends, the most dominant is that ESSA implementation varies tremendously from one state to another, due in large part to the law's flexibility. Moving forward, the question federal policymakers must grapple with is whether more flexible accountability systems have come at the expense of more equitable ones.

In the meantime, as states restart accountability systems following the one-year "pause" due to COVID-19, they have a unique opportunity to use the flexibility ESSA affords them in service of equity. First, they should learn from states whose policy choices led to more equitable accountability results prior to the pandemic. They should also evaluate their systems to ensure that school ratings and identification reflect the performance of students of color, students from low-income backgrounds, English learners, and students with disabilities; include relevant data on students' academic, social, and emotional needs in the wake of COVID-19 disruptions; and target resources and supports to schools whose students were disproportionately affected by the pandemic. •

APPENDIX: STATES' METHODOLOGIES TO IDENTIFY SCHOOLS FOR SUPPORT

Under ESSA, states faced several policy decisions in establishing their new accountability systems. These decisions, in turn, led to wide variations in the methodologies states created to identify schools for CSI, ATS, and TSI, as detailed in **Table 1**.

Annual Meaningful Differentiation. Among the policy choices states face, states must determine

✔ the "other academic" indicator to use in elementary and middle schools and the "school quality and student success" indicator(s) to use in all schools;
✔ the weighting of each indicator and how each weighting varies across schools serving different grade spans and/or in cases where there are too few students to measure a key indicator for a school;
✔ the minimum number of students (i.e., "n-size") that must be met for a school to be evaluated on an indicator[16] and how data for student subgroups, as opposed to "all students," will be considered;[17] and
✔ the rules or methods to differentiate between schools, including whether to provide an overall rating—like an A–F grade, 1–5 stars, or index score out of a number of total points.

CSI Identification. Under ESSA, states' policy choices include whether to

✔ identify CSI schools once every three years or more frequently;
✔ identify only the bottom 5% of Title I schools or additional schools (e.g., the bottom 5% of all schools or any school receiving the lowest rating);
✔ identify the bottom 5% of high schools, middle schools, and elementary schools separately to ensure that the overall population of CSI schools is proportionate to the number of schools serving each grade span;
✔ use the state's system of annual meaningful differentiation (i.e., the overall school rating) to identify CSI schools or modify or augment that system with additional rules to identify CSI schools (e.g., a rule to determine which schools, among those receiving the lowest overall rating, would be placed in CSI;
✔ use the four-year graduation rate, extended-year graduation rate, or a combination of both rates to identify high schools with low graduation rates; and
✔ consider a single year of data, or an average of multiple years of data, to identify CSI schools.

TSI Identification. Under ESSA, states arguably have the most flexibility in identifying TSI schools. In their ESSA plans, states decide

✔ how to define a "consistently underperforming" subgroup, including how many years of data warrant "consistently" and whether to evaluate "underperforming" subgroup performance (1) against the long-term goals for that subgroup, (2) based on gaps between that subgroup and other subgroups of students or between that subgroup and statewide averages, (3) based on subgroup performance on the state accountability index, or (4) using another method;
✔ if and how to distinguish schools in TSI with a "consistently underperforming" subgroup from schools identified for ATS;
✔ if they would permit schools to be in TSI, ATS, and CSI simultaneously or create mutually exclusive categories of schools;
✔ if they would identify ATS schools from schools already identified for TSI, from all schools, or from a different group of schools;[18] and
✔ how frequently to identify ATS schools.

TABLE 1. HOW STATES IDENTIFY SCHOOLS FOR CSI, ATS, AND TSI UNDER ESSA

STATE	CSI SCHOOLS	ATS SCHOOLS	TSI SCHOOLS	OTHER SCHOOLS
ARIZONA *After year 1 of implementation, Arizona is in the process of amending its ESSA plan. This analysis is based on the prior plan.*	**Every 3 years:** • any Title l school with combined ELA and math proficiency for all students in the lowest 5% on the statewide assessment, plus all F schools • any high school with a 5-year adjusted cohort graduation rate (ACGR) for all students below 67%	**Annually**, any school with a group of students performing, on its own, as poorly as students in Title I schools with a combined proficiency rate in the bottom 5% on the statewide assessment	SAME AS ATS	
CONNECTICUT	**Every 3 years:** • any school with a 3-year average score on the "Next Generation Accountability System" index in the bottom 5% statewide • any high school with a 6-year ACGR for all students below 70% for 3 consecutive years *Connecticut calls CSI schools "Turnaround"*	**Every 3 years**, any TSI or "Focus" school with a group of students performing, on its own, as poorly as students overall in Title I schools in CSI	DISTINCT DEFINITION: Any school with a group of students performing in the bottom 1% on all accountability indicators for 3 consecutive years (note: no schools met this definition in the first year of ESSA implementation)	Connecticut identifies a state-specific group of **"FOCUS" SCHOOLS** using a non-ESSA methodology. **Every 3 years**: Any school with a "high-needs" group (students from low-income families, English learners, and students with disabilities combined): • scoring in the lowest 10% of schools for ELA or math growth for 3 consecutive years; or • for high schools—scoring in the lowest 10% of schools for ELA or math proficiency for 3 consecutive years or having a 6-year ACGR below 70% for 3 consecutive years
FLORIDA	**Annually:** • any D or F school, plus schools where the "all students" group is in the bottom 5% statewide on the separate "Federal Percent of Points Index" (below 41%) • any high school with a 4-year ACGR for all students below 67%	**Annually**, any school with a group of students performing, on its own, below 41% on the state's "Federal Percent of Points Index"	WAITED FOR ADDITIONAL YEARS OF DATA TO IDENTIFY: **Annually**, any school with a group of students performing, on its own, at or below 31% on the "Federal Percent of Points Index" averaged across 3 years (note: this definition considers a "consistently underperforming" group to be a more serious pattern of low performance than a school needing ATS)	
INDIANA *After year 1 of implementation, Indiana is in the process of amending its ESSA plan. This analysis is based on the prior plan.*	**Annually:** • any Title I school receiving an F grade or any Title I school in the bottom 5%, averaged over 3 years, on the school accountability index (whichever identifies more schools) • any high school with a 3-year average 4-year ACGR for all students below 67%	**Every 4 years**, any school with a group of students performing, on its own, at or below the threshold on the school accountability index used to identify CSI schools	WAITED FOR ADDITIONAL YEARS OF DATA TO IDENTIFY: **Annually**, any school with a group of students performing, on its own, in the bottom 10% for that subgroup on the accountability index and receiving an overall rating of "does not meet expectations" for 2 consecutive years	

STATE	CSI SCHOOLS	ATS SCHOOLS	TSI SCHOOLS	OTHER SCHOOLS
LOUISIANA	**Annually:** • any Title I school receiving a D or F grade for 3 consecutive years • any high school with a 4-year ACGR for all students below 67% *Louisiana calls CSI schools "Comprehensive Intervention Required"*	**Annually:** • any school where a group of students, on its own, would have received an F grade for 2 consecutive years • any school with excessive rates of out-of-school discipline (twice the national average) *Louisiana calls ATS and TSI schools "Urgent Intervention Required"*	SAME AS ATS	Louisiana identifies a state-specific group of **"URGENT INTERVENTION NEEDED"** schools that are not required to develop an improvement plan. **Annually,** any school where a group of students, on its own, would have received a D or F grade
MICHIGAN *Michigan revised its ESSA plan before its first identification of TSI schools. This analysis reflects the updated plan.*	**Every 3 years:** • any school among the bottom 5% on the "Michigan School Index" • any high school with a 4-year ACGR for all students below 67%	**Every 6 years**, any school with a group of students performing, on its own, at or below the threshold on the "Michigan School Index" used to identify CSI schools	DISTINCT DEFINITION: **Annually,** any school with a group of students in the bottom 25% on each indicator of the "Michigan School Index"	
MISSISSIPPI	**Every 3 years:** • any Title I school among the bottom 5% on the state's school grade index • any high school with a 4-year ACGR for all students below 67%	**Annually**, any school with a group of students performing, on its own, as poorly as students in CSI schools	DISTINCT DEFINITION: **Annually,** bottom 5% of all schools statewide that score (1) in the lowest 50% of the overall school grade index, (2) in the lowest 25% of the 3-year average "gap-to-goal" (gap between a group's actual proficiency and the state's 70% proficiency goal) for a group of students, and (3) in the lowest 25% of the 3-year average improvement toward "gap-to-goal" for a group of students	
NEW MEXICO *After year 1 of implementation, New Mexico amended its ESSA plan. This analysis is based on the prior plan.*	**Every 3 years:** • any Title I school among the bottom 5% on the state's school grade index • any high school with a 4-year ACGR for all students below 67% for 2 of 3 prior years	**Every 3 years**, any school with a group of students performing, on its own, as poorly as students in Title I schools in the bottom 5% on the school grade index	SAME AS ATS	

STATE	CSI SCHOOLS	ATS SCHOOLS	TSI SCHOOLS	OTHER SCHOOLS
OHIO	**Every 3 years:** • any Title I school among the bottom 5% on the "ESSA Overall Grade" index (a variation of the state's A–F grading formula) • any high school with a 4-year ACGR for all students below 67% *Ohio calls CSI schools "Priority"*	**Every 3 years**, among Title I–eligible schools not identified for CSI or TSI, any school with a group of students whose academic achievement and graduation rates, on their own, are at or below the level of performance of that group of students within CSI schools *Ohio calls ATS schools "Warning"*	DISTINCT DEFINITION: **Every 3 years**, any Title I–eligible school • with a group of students whose academic achievement and graduation rates, on their own, are at or below the level of performance of that group within CSI schools for 2 consecutive years, or • that receives a D or F grade on the "gap closing" indicator for 2 consecutive years and has a group of students that performs (on academic achievement and graduation rates) below the bottom 30% of schools for that group *Ohio calls TSI schools "Focus"*	Ohio identifies a group of **"WATCH" SCHOOLS AND DISTRICTS** as part of a separate, state accountability system. **Annually**, any school that receives funding designated for serving English learners, students with disabilities, students from low-income families, or gifted students where at least one of those student groups demonstrates relatively low academic achievement and progress in ELA and math for that group of students
WASHINGTON	**Every 3 years:** • any Title I school with a 3-year combined "multiple measures score" on the "Washington School Improvement Framework" index in the bottom 5% of all schools statewide • any high school with a 3-year average 4-year ACGR for all students below 67%	**Every 3 years:** • any school with a group of students with a 3-year combined "multiple measures score" that falls below the threshold used to identify CSI schools • any school with consistently low progress toward ELP for English learners	SAME AS ATS (except TSI schools are not identified for low ELP progress)	Washington differentiates the level of support it provides to ATS and TSI schools *based on the number of "consistently underperforming" subgroups.* Schools with 1–2 such groups receive only **"FOUNDATIONAL AND SELF-DIRECTED SUPPORTS."**

REFERENCES FOR EACH STATE'S ESSA IDENTIFICATION METHODOLOGIES ARE BELOW (ALL ONLINE REFERENCES WERE LAST ACCESSED ON JANUARY 27–28, 2020):

• **Arizona:** Arizona Department of Education, "School Support and Improvement Innovation," https://www.azed.gov/improvement/.

• **Connecticut:** Connecticut Department of Education, "CSDE: Overall State Accountability Results Improve," press release, February 22, 2019, https://portal.ct.gov/SDE/Press-Room/Press-Releases/2019/CSDE-Overall-State-Accountability-Results-Improve; ———, "Connecticut Consolidated State Plan Under the Every Student Succeeds Act," August 3, 2017, https://portal.ct.gov/-/media/SDE/ESSA/august_4_ct_consolidated_state_essa_plan.pdf?la=en.

• **Florida:** Florida Department of Education, "Every Student Succeeds Act (ESSA) State Plan: Assessment, Accountability, and School Improvement Provisions," PowerPoint presentation, http://www.fldoe.org/core/fileparse.php/14196/urlt/ESSA-Summ-AA-SIP.pdf; ———, "Florida Department of Education Every Student Succeeds Act (ESSA) State Plan Submitted to United States Department of Education," September 24, 2018, http://www.fldoe.org/core/fileparse.php/14196/urlt/FL-ESSA-StatePlan.pdf.

• **Indiana:** Indiana Department of Education, "Indiana Consolidated ESSA State Plan," January 8, 2018, https://www2.ed.gov/admins/lead/account/stateplan17/inconsolidatedstateplanfinal.pdf; ———, "Amendment to Indiana's Consolidated State Plan Under the Every Student Succeeds Act," November 19, 2019, https://www.doe.in.gov/sites/default/files/essa/indiana-essa-amendment-final.pdf.

• **Louisiana:** Louisiana Department of Education, "Louisiana Believes: Louisiana's Elementary & Secondary Education Plan Pursuant to the Federal Every Student Succeeds Act (ESSA)," August 8, 2017, https://www.louisianabelieves.com/docs/default-source/louisiana-believes/louisianas-essa-state-plan.pdf?sfvrsn=20.

• **Michigan:** Michigan Department of Education, "Comprehensive Support and Improvement School Overview" (Lansing, MI: Author, 2019), https://www.michigan.gov/documents/mde/CSI_School_Policy_Brief_615485_7.pdf; ———, "Targeted Support and Improvement Schools Overview" (Lansing, MI: Author, 2019), https://www.michigan.gov/documents/mde/TSI_School_Policy_Brief_615484_7.pdf; ———, "Additional Targeted Support Schools Overview" (Lansing, MI: Author, 2019), https://www.michigan.gov/documents/mde/ATS_School_Policy_Brief_615487_7.pdf.

• **Mississippi:** Mississippi Department of Education, "Comprehensive and Targeted School Improvement," https://www.mdek12.org/OSI/Quick_Reference_CSI_TSI; ———, "CSI: Comprehensive Support & Improvement" (Jackson, MS: Author, 2019), https://www.mdek12.org/sites/default/files/Offices/MDE/OAE/OSI/Resources/what_is_csi_update_04_01_2019.pdf.

• **New Mexico:** New Mexico Public Education Department, "New Mexico Rising: New Mexico's State Plan for the Every Student Succeeds Act," August 9, 2017, https://webnew.ped.state.nm.us/wp-content/uploads/2018/02/FINAL-APPROVED-NM-State-ESSA-Plan.pdf.

• **Ohio:** Ohio Department of Education, "Priority Schools," http://education.ohio.gov/Topics/District-and-School-Continuous-Improvement/Federal-Programs/Elementary-and-Secondary-Education-Act/ESEA-Support-Schools-and-Districts/Priority-Schools; ———, "Focus and Warning Schools," http://education.ohio.gov/Topics/District-and-School-Continuous-Improvement/Federal-Programs/Elementary-and-Secondary-Education-Act/ESEA-Support-Schools-and-Districts/Focus-Schools.

• **Washington:** Washington Office of the Superintendent of Public Instruction, "Washington School Improvement Framework: Key Highlights," https://www.k12.wa.us/sites/default/files/public/esea/essa/pubdocs/1wsifhighlightsandupdates.pdf; ———, "Washington's ESSA Consolidated Plan," January 12, 2018, https://www.k12.wa.us/sites/default/files/public/esea/essa/pubdocs/essaconsolidatedplan-final.pdf.

ENDNOTES

1 U.S. Department of Education, "Betsy DeVos, Secretary of Education—Biography," June 27, 2019, https://www2.ed.gov/news/staff/bios/devos.html?src=hp.

2 M. Keierleber, "74 Interview: John King on His Year as Ed Secretary, the Trump Administration, His New Role at Ed Trust," *The 74,* March 5, 2017, https://www.the74million.org/article/74-interview-john-king-on-his-year-as-ed-secretary-the-trump-administration-his-new-role-at-ed-trust/.

3 Alliance for Excellent Education, "When Equity Is Optional: Students of Color Disproportionately Attend Low-Rated Schools" (Washington, DC: Author, 2020).

4 For example, subsequent to the first year of ESSA implementation, New Mexico amended its ESSA plan and will no longer use an A–F grading system to rate schools or identify them for CSI or TSI in the future.

5 U.S. Department of Education, "Key Policy Letters Signed by the Education Secretary or Deputy Secretary," March 20, 2020, https://www2.ed.gov/policy/gen/guid/secletter/200320.html.

6 D. Goldstein, "Research Shows Students Falling Months Behind During Virus Disruptions," *New York Times,* June 5, 2020, https://www.nytimes.com/2020/06/05/us/coronavirus-education-lost-learning.html.

7 In this analysis, all references to targeted support and improvement (TSI) schools include all schools in the state identified with one or more "consistently underperforming" subgroups as well as all schools in the state identified for additional targeted support (ATS) if the state distinguished between the two groups of schools.

8 See the following sources for examples: Alliance for Excellent Education, *ESSA in the States: How Good is Your State's Education Plan?* (Washington, DC: Author, 2018), https://all4ed.org/essa/essa-in-your-state/; C. Aldeman et al., *An Independent Review of ESSA State Plans* (Sudbury, MA: Bellwether Education Partners, 2017), https://bellwethereducation.org/publication/independent-review-essa-state-plans; Collaborative for Student Success, "Check State Plans," 2017, https://checkstateplans.org/; and National Urban League, *Standards of Equity & Excellence: A Lens on ESSA State Plans* (Washington, DC: Author, 2018), http://ncos.iamempowered.com/pdf/ESSA%20Full%20Report.pdf.

9 To date, very limited research on the results of ESSA accountability systems exists. One of the few available studies is a 2019 report from the Center on Education Policy at the George Washington University, which finds a high level of variation in the percentage of schools identified for CSI and TSI across states, from as low as 3% to as high as 99% of schools identified. For more, see D. Stark-Rentner, K. Tanner, and M. Braun, *Number of Low-Performing Schools by State in Three Categories (CSI, TSI, and ATSI), School Year 2018–19*, July 2019 Update (Washington, DC: Center on Education Policy, 2019), https://www.cep-dc.org//displayDocument.cfm?DocumentID=1508.

10 The Alliance for Excellent Education (All4Ed) compiled school-level data from the first year of ESSA implementation (typically the 2017–18 school year) in 10 states, including demographic data, school ratings, and whether schools were identified for support. Four of the 10 states are "priority places" of the W.K. Kellogg Foundation, whose generous support made this data collection possible: Louisiana, Michigan, Mississippi, and New Mexico. All4Ed selected the remaining states (Arizona, Connecticut, Florida, Indiana, Ohio, and Washington) based on several factors, including geographic diversity and size, availability of data (such as identification of both CSI and TSI schools, overall school ratings, school enrollment and demographic data, and school subgroup achievement and graduation rate data), and demand from All4Ed partners. Generally, the schools included in each state's data set are schools that received a rating in the accountability system and/or were identified for CSI or TSI (including ATS).

11 Subsequent to the first year of ESSA implementation, New Mexico amended its ESSA plan and will no longer use an A–F grading system to rate schools or identify them for CSI or TSI in the future.

12 In addition to identifying all D and F schools, Florida schools receiving a C grade or higher may be identified for CSI if the school has a graduation rate below 67% or scores among the bottom 5% of schools on Florida's Federal Percent of Points Index (FPPI).

13 Alliance for Excellent Education, "When Equity Is Optional: Students of Color Disproportionately Attend Low-Rated Schools."

14 Such a result may be driven by Indiana's choice to identify all Title I schools with an F grade for CSI. However, subsequent to the first year of ESSA implementation, Indiana amended its ESSA plan and will no longer use a separate, federal A–F grading system to identify CSI schools. Indiana continued to use its state A–F grading system for other purposes, though legislation will prevent any individual school grade from declining in 2019 or 2020. For more, see E. K. Fittes, "Indiana Lawmakers Passed a 2-year Hold Harmless. Here's What That Means," *Chalkbeat Indiana*, February 2, 2020, https://chalkbeat.org/posts/in/2020/02/03/indiana-lawmakers-passed-a-2-year-hold-harmless-heres-what-that-means/.

15 In Florida, all D and F schools are identified automatically for CSI. As a result, all TSI schools, by rule, receive a C grade or better. In addition, Florida's system was designed in such a way that two-thirds of all schools were identified. As a result of these choices, the percentage of A and B schools receiving TSI in Florida was particularly high.

16 For more, see Alliance for Excellent Education, "Ensuring Every Student Matters: What Is N-Size and Why Is It Important?" (Washington, DC: Author, 2018), https://mk0all4edorgjxiy8xf9.kinstacdn.com/wp-content/uploads/2018/11/N-Size-Fact-Sheet-NOV-2018.pdf; and ———, "N-Size in ESSA State Plans" (Washington, DC: Author, 2018), https://mk0all4edorgjxiy8xf9.kinstacdn.com/wp-content/uploads/2018/11/N-Size-in-ESSA-State-Plans.pdf.

17 For more, see ———, "Too Many States Minimize Student Subgroup Performance in ESSA Accountability Systems" (Washington, DC: Author, 2018), https://mk0all4edorgjxiy8xf9.kinstacdn.com/wp-content/uploads/2018/12/ESSA-Subgroup-Performance-State-Accountability-Systems-UPDATED.pdf.

18 For more, see ———, "Screened Out? Some States May Underidentify Schools with Low-Performing Student Subgroups" (Washington, DC: Author, 2019), https://mk0all4edorgjxiy8xf9.kinstacdn.com/wp-content/uploads/2019/03/TSI-Screener-Chart_FINAL.pdf.