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State Systems of Identification and Support under ESSA:
A Focus on Designing and Revising
Systems of School Identification

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS

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State Systems of Identification and Support under ESSA: **A Focus on Designing and Revising Systems of School Identification**

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INTRODUCTION

This is the first paper in a series of two discussing systems of school identification and support under the Every Student Succeeds Act (ESSA). The purpose of this paper is to provide a fairly comprehensive overview of the federal law and key design considerations for states as they develop and revise their systems of school identification under ESSA. States will be required to identify schools in need of Comprehensive Support and Improvement (CSI), Targeted Support and Improvement (TSI), Additional Targeted Support (ATSI), and any additional state-determined categories of schools. In all cases, identification must be informed by all of the state's ESSA accountability indicators and the system of annual meaningful differentiation; however, depending on the category of support, states have varying degrees of flexibility in how they choose to use their accountability system to identify schools. The first part of this paper provides annotated excerpts of the relevant ESSA language and offers additional clarification and summary. In the second part, we discuss the importance of defining a system of identification that aligns to the state's theory of action and resources and key policy levers that serve to support that goal.

The second paper in this series, *State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System* (D'Brot, Lyons, & Landl, 2017), focuses on both technical and policy considerations for states in evaluating the success of their identification and accountability systems under ESSA. The second paper also discusses the interconnectedness of the identification methods to the state system of supports for identified schools and emphasizes the importance of ongoing system evaluation and improvement.

CLARIFYING STATUTORY REQUIREMENTS

A common theme in state agencies across the country is a struggle to understand the legal requirements associated with school identification outlined in ESSA. This section of the paper is intended to provide an overview and explanation of the required components of a state's system of identification as mandated by federal law. Although we are not providing a legal interpretation of the law, we present recommendations throughout the paper based on our knowledge and work with state agencies, policy consultants, and lawyers. States should apply these recommendations based on state-specific contexts, requirements, and constraints.

There are three categories of schools that state agencies must identify for support:

- Comprehensive Support and Improvement;
- Targeted Support and Improvement; and
- Additional Targeted Support and Improvement.

At the discretion of the state, additional state-determined categories of support may be identified for inclusion in the system. Comprehensive Support and Improvement Schools are generally identified on the basis of the overall performance of students within the school, while the Targeted Support and Improvement Schools are identified on the basis of low performing subgroups of students within the schools. We start with a description of the Comprehensive Support and Improvement identification since that is the category that appears first in ESSA and is also the most prescriptive.

COMPREHENSIVE SUPPORT AND IMPROVEMENT (CSI)

At least once every three years, states must identify schools for CSI on the basis of the state’s system of meaningful differentiation. This system must be based on all indicators in the state’s accountability system and afford substantial weight to the academic achievement indicator, the additional academic indicator for elementary and middle schools, the graduation rate indicator and the English Language Proficiency indicator and all indicators, in the aggregate, must have much greater weight than is afforded to the indicator(s) of school quality or student success. The state has discretion to develop a system of meaningful differentiation that meets these requirements in any way they see fit. Many states combine indicators in a compensatory way using a weighted combination of the indicator scores to arrive at a total score or index. Another way to combine the indicators is through a conjunctive approach, where some bar of minimum performance must be met on each indicator in order for a school to obtain a particular score or overall performance rating. Yet another option is to use a decision table or ‘business rules’ approach where different profiles of performance receive different scores or performance designations. Several approaches are described based on approved ESSA plans in the tables below.¹

Table 1. Approved Approaches to CSI Identification for non-High Schools

Approach	Description
Traditional CSI Identification for non-High Schools	Many states that used an index-approach to rating schools identified CSI schools as those schools that fell below the 5 th percentile on the accountability index. ²
Alternative CSI Identification for non-High Schools	Other examples included consecutive underperformance: <ol style="list-style-type: none"> 1. Two consecutive years of underperformance in general.³ 2. Falling below the 5th percentile on an accountability index and demonstrating very low academic growth in two consecutive years.⁴ Another example prioritized an examination of the accountability system’s components by identifying CSI schools using indicator-specific performance. ⁵ <p>A final example focused on a combined view of snapshot performance and progress over time against the accountability system. While more complicated in nature, this multi-step process appears to prioritize classifying schools accurately and maximizing the number of schools that can be identified without over-extending SEA resources.⁶</p>

1 The approaches in approved ESSA plans are up-to-date as of October 2017—the time this draft was written.

2 The states with an accountability index that used the 5th percentile as the threshold for CSI identification included Arizona, Connecticut, the District of Columbia, Illinois, and Maine.

3 Louisiana identifies CSI schools as those that earn a school rating of a “D” or “F” for three consecutive years.

4 Tennessee requires a combination of lowest performing (i.e., below the 5th percentile school on their accountability index) and lowest growing schools (i.e., 2 years of consecutive Level 4 or Level 5 performance on the Tennessee Value-Added Assessment System, TVAAS) to be identified as CSI.

5 Oregon identified CSI schools using performance levels for each of the accountability system’s indicators. CSI schools are identified if they exhibit Level 1 (i.e., lowest level performance) on a majority of system indicators, or the lowest 2 performance levels on all of the system’s indicators.

6 Vermont uses a multi-step calculation that requires at least 2 years of accountability index data to identify CSI schools. CSI schools are those that demonstrate low performance on **both** the current year’s accountability score and **low** progress based on changes from the prior year’s accountability score.

No matter the approach underlying the system of meaningful differentiation, the state must be able to identify at least the lowest performing five percent of all Title I schools in the state for CSI. The state may identify more than required—for example if the lowest performance designation using a decision table approach captures more than just the bottom five percent of Title I schools—as long as at least the lowest performing five percent of Title I schools are identified. Likewise, states may identify non-Title I schools as CSI, as long as this is done in addition to identification of the lowest five percent of Title I schools.

In addition to the five percent rule discussed in Table 1 above, schools can be identified for CSI in two additional ways. First, any high school with a graduation rate less than 67 percent is automatically identified. This applies to all high schools in the state, not just those receiving Title I funds, which are described in Table 2 below. Secondly, Title I schools that have failed to exit the Additional Targeted Support category within a state-determined number of years must also be re-designated as CSI schools. There is more discussion of this requirement in the section discussing exit criteria.

Table 2. Approved Approaches to CSI Identification for High Schools

Approach	Description
Traditional CSI Identification for High Schools	Most states ⁸ using a traditional approach identified any high school with a 4-year Adjusted Cohort Graduation Rate (ACGR) less than 67%.
Alternative CSI Identification for High Schools	<p>Alternatives to the 67% ACGR threshold included higher thresholds based on historical graduation rates (e.g., < 86% 4-year ACGR) or higher thresholds due to the use of extended year ACGRs.⁹</p> <p>Other alternatives included using a composite graduation rate with a 67% threshold for the relevant ACGR.¹⁰</p>

Once identified for CSI, local education agencies (LEAs) must work with the school and its stakeholders to develop and implement a state-approved comprehensive support and improvement plan that is based on student performance on all of the accountability indicators and state-determined long-term goals along with the results of a school-level needs assessment, includes evidence-based interventions, and identifies and addresses resource inequities. The implementation of this plan is to be monitored and periodically reviewed by the state.

The following table provides ESSA’s statutory language related to CSI, including annotations, to help readers readily interpret the language without needing to reference the full law. Language highlighted in red corresponds to a numbered note in the right-hand column of the table. In some cases, the notes are direct copies of additional language from the law. A similar table is provided at the end of each of the sub-sections within this part of the paper.

7 Please note that for the purposes of CSI, Title I schools are those schools that are receiving Title I funds.
 8 These states included the District of Columbia, Illinois, Louisiana, and Vermont.
 9 Connecticut’s threshold is 70% for a 6-year ACGR and Maine’s threshold is 86% for a 4-year ACGR.
 10 The District of Columbia also used a 67% threshold for the 5-year ACGR. Arizona used a composite for the 4-, 5-, 6-, and 7-year ACGR with a 67% threshold.

Even if states have already established their policy and no longer need this information for system design, states should feel free to use or reference this table in developing their communications materials for internal or external use or when engaging in the required (and recommended) periodic review of state plans themselves.

Table 3. Annotated Language Regarding Comprehensive Support and Improvement

ESSA Language	Notes
<p>"Identification of Schools—Based on the system of meaningful differentiation described in subparagraph (C),¹ establish a State-determined methodology to identify—</p> <p>(c)(4)(D)(i)¹¹ Beginning with the school year 2017-2018,² and at least once every three school years thereafter, one statewide category of schools for comprehensive support and improvement, as subsection (d)(1),³ which shall include--</p> <p style="padding-left: 20px;">(I) not less than the lowest-performing 5 percent of all schools¹² receiving funds under this part in the State;</p> <p style="padding-left: 20px;">(II) all public high schools⁴ in the State failing to graduate one third or more of their students; and</p> <p style="padding-left: 20px;">(III) public schools in the State described under subsection (d)(3)(A)(i)(II);⁵ and</p> <p>(c)(4)(D)(ii) At the discretion of the State, additional statewide categories of schools."</p>	<ol style="list-style-type: none"> 1. Subparagraph (C) describes the system of annual meaningful differentiation for all public schools in the state. The system must be based on all indicators in the state's accountability system and afford substantial weight to each indicator—except for the indicator(s) of school quality or student success—and all indicators, in the aggregate, must have much greater weight than is afforded to indicator(s) of school quality or student success. 2. 2017-2018 has been since revised to 2018-2019 per the January 13, 2017, Dear Colleague Letter from the U.S. Department of Education. 3. "(d)(1) Comprehensive Support and Improvement.— (A) In General.—Each state educational agency receiving funds under this part shall notify each local educational agency in the State of any school served by the local educational agency that is identified for comprehensive support and improvement under subsection (c)(4)(D)(i)." 4. Identification for CSI based on graduation rates less than 67% is for all public high schools, not just Title I high schools. The rest of the identification criteria for CSI apply only to Title I schools unless the state decides to expand identification to all schools. 5. Some Title I schools may also be identified for CSI, per subsection (d)(3)(A)(i)(II), if they have been identified as in need of ATSI and have not satisfied the exit criteria within a state-determined number of years.

TARGETED SUPPORT AND IMPROVEMENT AND ADDITIONAL TARGETED SUPPORT

Unlike with CSI, states have a considerable amount of flexibility in determining which schools are identified for Targeted Support and Improvement. The main requirement around TSI is that states must identify any school (Title I or not) in which at least one subgroup of students is *consistently underperforming* and the identification must happen annually. States have the flexibility to define consistently underperforming as they see fit as long as the designation

¹¹ We include the full indexing of the paragraphs in the cases where these paragraphs are cross-referenced in other relevant parts on the law.

¹² Please note, all schools receiving funds refers to Title I schools receiving funds.

is based on all of the accountability indicators and the system of meaningful differentiation. Given this flexibility, the definitions for consistently underperforming vary greatly across states. States often require multiple years of low performance on one or more indicators, and many states have also incorporated subgroup performance on long-term goals and measures of interim progress. Part two of this paper is dedicated to discussing different strategies for identifying TSI schools (and exiting Additional Targeted Support schools) and how states can align these systems to their system goals and theories of action for school support and the state resources.

The third required category of identified schools is Additional Targeted Support (ATSI). These schools are defined as any TSI school, or any school should the state choose to not make ATSI a subset of TSI,¹³ where the subgroup performance of any subgroup of students, on its own, would lead to identification for CSI because the subgroup performance falls within the range of the lowest performing five percent of all Title I schools. Given the widespread and persistent achievement gaps across the country, it is likely that, depending on the state’s definition of consistently underperforming, most or all TSI-identified schools may also meet the definition for ATSI. Therefore, if the state chooses to make ATSI schools a subset of TSI schools, how states design their TSI identification criteria will strongly influence the number of schools identified for ATSI.¹⁴ Several examples of how states approached TSI and ATSI identification are shown in the table below.

Table 4. Approved Approaches to TSI and ATSI Identification

Approach	Description
TSI Identification	As one might expect, TSI identification reflected variability in state designs. Some approved plans identified TSI schools using single-year snapshots of underperformance of a specific student group. ¹⁵ Other approved plans identified TSI schools using consecutive years of underperformance of student groups. ¹⁶

13 Slide 21: <https://www2.ed.gov/admins/lead/account/stateplan17/stateplanwebinar812017.pdf>

14 We also recognize that states have proposed alternate approaches to identifying TSI and ATSI schools. For example, states might apply the lowest 5% performance rule to subgroups within a school for TSI and specify the length of time schools exhibit below 5% performance as the ATSI criteria. If applying this approach, we recommend states examine both the initial identification rates and subsequent cascade rates due to persistent achievement gaps.

15 Several states that used snapshot data to identify TSI schools included the District of Columbia, and Tennessee. Oregon used snapshot data from one and three years of data for TSI school identification.

16 Other states included consecutive underperformance of student groups as their identification criteria of TSI schools. Arizona, Connecticut, Illinois, and Maine used 3 years of underperformance to identify TSI schools, however the inclusion criteria ranged from subgroups in the lowest 1% of performance to the lowest 10% of performance as inclusion criteria. Louisiana and Vermont used 2 years of underperformance to identify TSI schools and also differed with the focus and severity of criteria (i.e., LA: Subgroups with an equivalent “F” rating OR those with persistent out-of-school suspension rates; VT; largest achievement gaps and lowest 5% of improvement).

Approach	Description
<p>ATSI Identification</p>	<p>States generally fell into one of five categories with ATSI identification:</p> <ol style="list-style-type: none"> 1. ATSI schools are used to indicate a cascade from TSI, to ATSI, to CSI that indicates increasing severity of subgroup underperformance;¹⁷ 2. ATSI schools are a subset of TSI schools;¹⁸ 3. ATSI identification is an early indicator of TSI or a differentiator of severity compared to TSI schools;¹⁹ or 4. ATSI schools are either synonymous or not overtly named, but require supplemental resources for TSI school identification.²⁰ 5. Some states did not specify the difference between TSI and ATSI identification, but instead grouped schools as part of a single identification process.²¹

One place where states may have some flexibility is in the timing and frequency of the identification of ATSI schools. Unlike CSI and TSI schools, the language of the law does not specify exactly when and how often ATSI identification must happen, so states may wish to identify ATSI schools only after schools have been designated as TSI for a certain number of years consecutively and/or only identify schools every few years (e.g., in alignment with the CSI schedule). However, states could choose to identify ATSI schools annually, in alignment with the process of identifying TSI schools. Either approach should be informed by the state’s theory of action, intended support and improvement processes, and capacity considerations for LEAs and the SEA. The ESSA Consolidated State Plan template provided by USED asks for states to declare the first year of identification for ATSI schools and also the frequency with which they will identify ATSI schools.

As of the time this paper was developed, we reviewed the state ESSA plans approved by the U.S. Department of Education (USED). Generally, there was a high degree of similarity in CSI, TSI, and ATSI identification years and cycles. For example, most states specified that CSI and TSI schools would be identified in school year (SY) 2018-2019,²² with 3-year CSI identification cycles and annual TSI identification cycles as required by law. There was also a strong alignment between CSI and ATSI cycles in the cases of state plans that identified ATSI in SY 2018-2019. In states using multiple years of data to identify TSI and ATSI schools,

¹⁷ The District of Columbia and Louisiana specify that ATSI is a cascade from TSI using consecutive underperformance of a focal student group.

¹⁸ Connecticut, Maine, and Vermont specify that ATSI schools are identified from the set of TSI schools.

¹⁹ Illinois and Tennessee use ATSI as a concurrent differentiator to TSI schools. That is, there is evidence of specific, more severe, or more pervasive subgroup underperformance than what is found in TSI schools.

²⁰ Arizona and Oregon do not explicitly identify ATSI schools but use TSI school improvement expectations to provide additional targeted support based on student group underperformance.

²¹ Arizona did specify that TSI would be identified annually based on significant achievement gaps for any low achieving student group in a school. Vermont identified schools on a range of equity categories, with their first filter (i.e., Equity 1) serving as a sort of early alert for possible TSI identification if subgroup performance does not improve.

²² Please note, identification year refers to the first-year schools are required to engage in improvement efforts as a result of being identified as CSI, TSI, or ATSI. For example, schools identified as CSI in SY 2018-2019 are typically identified using SY 2017-2018 data in the Spring or Summer of 2018 and are required to engage in planning or improvement efforts at the start of SY 2018-2019.

identification is taking place SY 2019-2020 using data from SY 2017-2018 and SY 2018-2019. While the TSI and ATSI dates have some slight variability, all states with approved plans have CSI identification scheduled no later than SY 2018-2019.

As mentioned under the CSI sub-section, schools that do not exit the ATSI designation after a state-determined number of years will be automatically re-designated as CSI schools. Given this, states should consider using the following four strategies to recognize the implications of the system design and manage capacity constraints:

1. Maintain an awareness of the numbers of schools that are likely to be identified for ATSI;
2. Carefully think through systems of support that can be provided to LEAs with a significant number of schools identified for ATSI;
3. Establish ATSI exit criteria that are coherent with those supports; and
4. Model how many schools are likely to cascade into CSI after a number of years so that state resources and capacity can be aligned to the needs of the possible influx of newly identified CSI schools.

Once identified as TSI or ATSI, schools, in partnership with their stakeholders, must develop and implement an LEA-approved targeted support and improvement plan to improve student outcomes for the subgroup(s) whose performance triggered the identification. The plan must be informed by all of the accountability indicators and long-term goals and include evidence-based interventions. Schools that have been identified as ATSI also must address resource inequities within their targeted support and improvement plans. The implementation of the TSI and ATSI plans is to be monitored by the LEA and result in additional LEA-determined action if the school does not make sufficient progress. While TSI and non-Title I ATSI schools would receive additional LEA-determined action, it is important to note that a Title I ATSI school that does not make sufficient progress would be reclassified as a CSI school.

Table 5 contains the relevant ESSA language regarding TSI and ATSI identification and annotations in the right-hand column. Table 6 contains additional language and a note regarding a special rule for TSI identification in the 2017-2018 school year. Because the January 17, 2017, [Dear Colleague Letter](#) delayed implementation of school identification to the 2018-2019 school year, it is unclear the degree to which this special rule is being enforced. Depending on state-specific approaches and TSI/ATSI timelines, there may be flexibility for states if approaches and strategies are well justified and grounded in evidence that should promote continuous improvement. Additionally, the ESSA template for Consolidated State Plans released by USED does not have any section that addresses this special rule.

Table 5. Annotated Language Regarding TSI and ATSI

ESSA Language	Notes
<p>“(2)Targeted Support and Improvement.—</p> <p>(A) In General.—Each State educational agency receiving funds under this part shall, using the meaningful differentiation of schools described in subsection (c)(4)(C)—</p> <p style="padding-left: 40px;">(i) notify each local education agency in the State of any school served by the local education agency in which any subgroups of students in consistently underperformance, as described in subsection (c)(4)(C)(iii);¹ and</p> <p style="padding-left: 40px;">(ii) ensure such local educational agency provides notification to such school with respect to which subgroup or subgroups of students in such school are consistently underperforming as described in section (c)(4)(C)(iii).”</p> <p>“(C)Additional Targeted Support.—A plan described in subparagraph (B*) that is developed and implemented for any school receiving a notification under this paragraph² from the local educational agency in which any subgroup of students, on its own, would lead to identification under subsection (c)(4)(D)(i)(I) using the State’s methodology under subsection (c)(4)(D) shall also identify resource inequities (which may include a review of local education agency and school level budgeting), to be addressed through implementation of such plan.”</p>	<ol style="list-style-type: none"> 1. “Annual Meaningful Differentiation. (c) (4)(C)(iii) include differentiation of any such school in which any subgroup of students is consistently underperforming, as determined by the State, based on all indicators under subparagraph (B) and the system established under this subparagraph [i.e., the system of meaningful differentiation].” 2. As we interpret this language, Additional Targeted Support (ATSI) schools are intended to be a subset of the TSI schools. ATSI schools are schools that have already been identified for TSI and in which any subgroup of students, on its own, would place the school in the bottom five percent of schools in the state. Additional guidance from USED says that states can use this definition, or, should they wish, states can choose to identify any school that meets the identification criteria for ATSI (i.e., not a subset of TSI schools). Once a school has been identified as ATSI, the LEA must identify and address resource inequities within the district to be part of the Targeted Support and Improvement Plan.

*Subparagraph B refers to the Targeted Support and Improvement **Plan** of the (2) Targeted Support and Improvement section of the law.

Table 6. Annotated Language Regarding the Special Rule

ESSA Language	Notes
<p>“Special Rule.—The State educational agency, based on the State’s differentiation of schools under subsection (c)(4)(C) for school year 2017-2018,¹ shall notify local educational agencies of any schools served by the local educational agency in which any subgroup of students, on its own, would lead to identification under subsection (c)(4)(D)(i)(I) using the State’s methodology under subsection (c)(4)(D), after which notification of such schools under this paragraph shall result from differentiation of schools pursuant to subsection (c)(4)(C)(iii).”</p>	<ol style="list-style-type: none"> 1. Because states are no longer required to use their ESSA state plans to identify schools for the 2017-2018 school year, the special rule may no longer apply. This rule would have required states to identify schools as in need of Targeted Support and Improvement if the performance of any subgroup of students, on its own, would place the school in the bottom five percent of schools in the state. This would likely identify upwards of 50% of schools in most states due to widespread and persistent achievement gaps across the country. However, because the timeline for school identification has been delayed, most states have not addressed the special rule. The law states that after the 2017-2018 school year, identification of schools for Targeted Support and Improvement is based on any subgroup of students that is consistently underperforming, as determined by the state.

EXIT CRITERIA

The law is fairly open-ended regarding how states define exit criteria for the different categories of schools. For CSI schools, the law only states that there must be statewide exit criteria, which, if not satisfied within a state-determined number of years—not to exceed four—results in more rigorous action determined by the state. ESSA does not dictate what this more rigorous action must be, but suggests the option of addressing school-level operations. This means that states have a great deal of flexibility in determining both the nature of the exit criteria and the next steps for intervention if schools do not meet the exit criteria within at most four years. However, USED has been providing feedback to states regarding the specificity of exit criteria—specifically with regard to ESEA requirements that ensure continued progress to improve student academic achievement and school success in the state.

Many states have chosen to align the exit criteria for CSI with the entrance criteria. In other words, if the school no longer meets the one or more identification requirements that triggered CSI (e.g., no longer being in the bottom 5 percent of schools, the graduation rate rose to above 67 percent), they exit CSI status. One of the main benefits of this type of system is coherence. The goals for improvement are clear for schools and stakeholders and once the schools have exited CSI, unless they regress in their progress, that school is not likely to be re-identified for CSI in the next round of identification. In this case, however, states will need to clarify that the exit criteria is not simply normative. For example, if the lowest performing schools in a state exhibit a decline in performance, a CSI school may—through no demonstration of improvement—satisfy the stated exit criteria. Thus, we recommend that states specify exit criteria to reflect improvement in outcomes, in addition to no longer meeting the identification requirement for CSI identification.

Other states have chosen to value progress on one or more indicators or toward long-term goals as satisfactory for exiting CSI status. When defining exit criteria, states should keep in mind their policy priorities (e.g., achievement gaps, growth), their theory of action regarding how the accountability system is intended to bring about school improvement, their structures of support, and the impact of their exit criteria on the system and state resources over time (e.g., number of schools qualifying for more rigorous action and the capacity of the state to implement effective interventions). The second paper in this series provides more information for states related to monitoring and evaluating the effectiveness of identification and exit systems.

Since the targeted support and improvement plans are approved and monitored by the LEAs, and, if necessary, more rigorous action is determined and taken by the LEA, states are not required to define exit criteria for TSI schools. In addition to CSI schools, the only other category of schools for which the state needs to define statewide exit criteria is ATSI schools.

As with CSI schools, the statewide exit criteria for ATSI schools are determined by the state. Many of the same considerations defining exit criteria for CSI schools apply to ATSI. Additionally, states should consider how the definition of the ATSI exit criteria will influence the number of schools cascading into CSI after a state-determined number of years. Importantly, there is no

legal upper-bound on the number of years within which ATSI schools that have failed to exit must be re-designated as CSI schools (as opposed to the four-year maximum applied to CSI schools). Table 7 provides the annotated ESSA language related to the statewide exit criteria for CSI and ATSI schools.

Table 7. Annotated Language Regarding Exit Criteria

ESSA Language	Notes
<p>Continued Support for School and Local Educational Agency Improvement.— To ensure continued progress to improve student academic achievement and school success in the State, the State educational agency—</p> <p>(d)(3)(A) shall—</p> <p>(d)(3)(A)(i) establish statewide exit criteria for--</p> <p>(d)(3)(A)(i)(I) schools identified by the State for comprehensive support and improvement under subsection (c)(4)(D)(i), which, if not satisfied within a State-determined number of years (not to exceed four years), shall, result in more rigorous State-determined action, such as the implementation of interventions (which may include addressing school-level operations); and</p> <p>(d)(3)(A)(i)(II) schools described in paragraph (2)(C), which, if not satisfied within a State-determined number of years,¹ shall, in the case of such schools receiving assistance under this part, result in identification of the school by the State for comprehensive support and improvement under subsection (c)(4)(D)(i)(III).</p>	<p>1. While schools that have not exited ATSI status within a designated number of years must move into CSI, the federal law does not set a limit on the maximum number of years allowable before CSI is triggered for these schools. States have full discretion to choose a number of years that fits within their model of support and theory of action for school improvement.</p>

SUMMARY OF ESSA IDENTIFICATION REQUIREMENTS

The figure below provides a visual overview of the information provided in the first part of this paper. The flow chart displays the different categories for school identification along with the frequency with which they must be identified, the action that follows identification, the exit criteria, and any consequences if exit criteria are not satisfied.

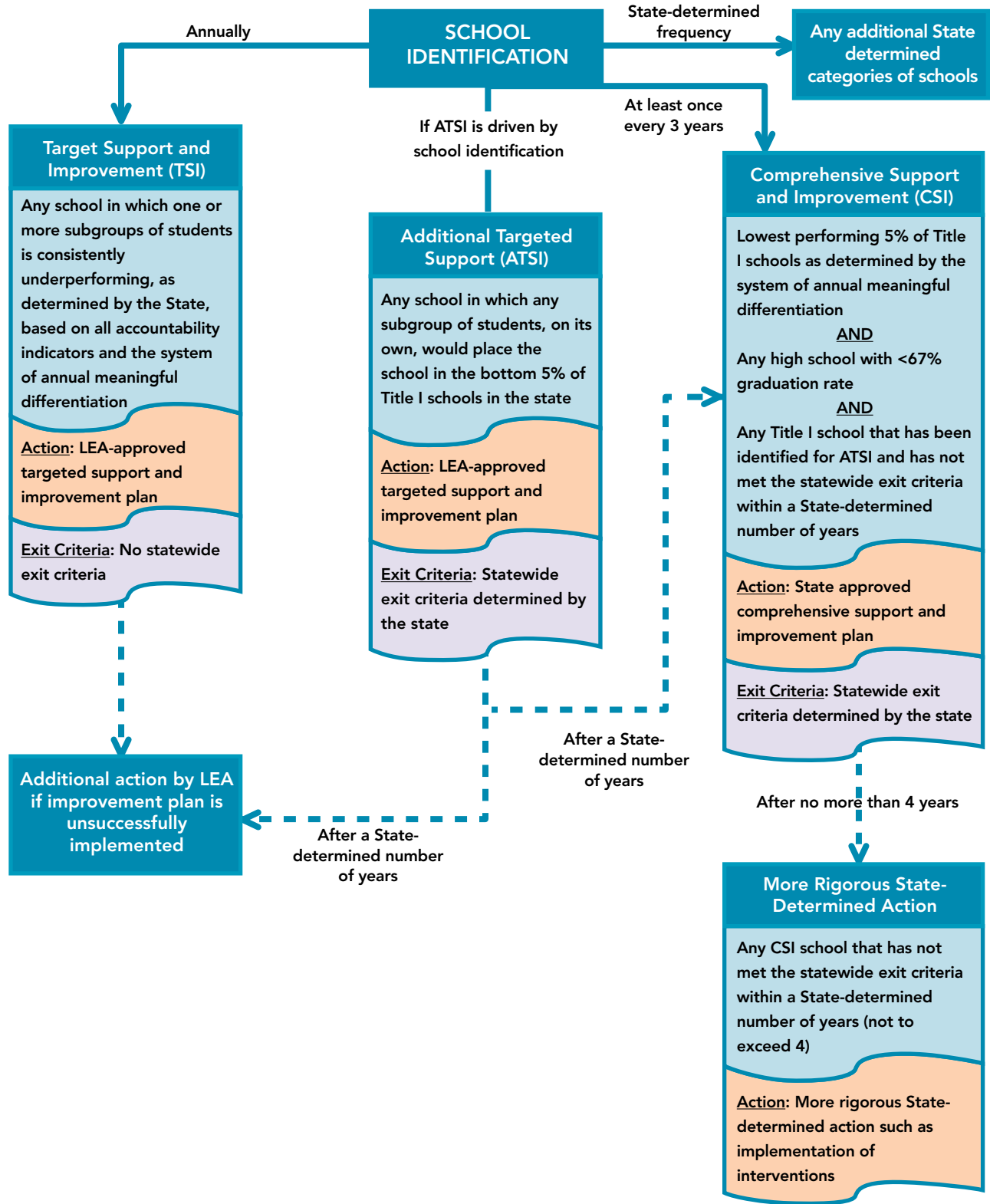


Figure 1. Overview of ESSA Requirements for School Identification

STRATEGIES FOR DESIGNING SYSTEMS OF SCHOOL IDENTIFICATION

There are two primary considerations when designing an identification scheme for schools. First, the state must consider its theory of action for how the accountability system will bring about desired change, and secondly, what resources and capacity does the state have to support low performing schools. Both of these considerations must be accounted for when planning how and *how many* schools are appropriate to be identified for support. We recognize that states may set expectations based only on the number of schools they can support **or** based on how schools should demonstrate improvement over time. Thus, we recommend that states base improvement expectations on designs coherent with support and improvement plans and realistic considerations of capacity to support intensive improvement efforts tied to improvement expectations. This should be informed by a theory of action.

A theory of action is a chain of logic that specifies how the design and implementation of the state's accountability system and system(s) of support and school improvement will bring about changes that lead to desired outcomes. For state accountability systems, the intended outcomes are often related to increases in student achievement and/or college and career readiness. Once the chain of logic is constructed, the theory of action represents a series of testable hypotheses that can inform system evaluation and improvement efforts. More information regarding how to evaluate an accountability system can be found in the second paper in this series, *State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System* (D'Brot, Lyons, & Landl, 2017).

Two examples of identification and support approaches for TSI schools are provided in Figures 2 and 3. These examples are intended to illustrate how different identification schemes for TSI can represent different theories of actions related to the goals of TSI identification and the provision of school support. Figure 2 provides an example of moderating the rate of TSI identification (e.g., few schools identified) with fairly heavy-handed state support to effect change where it is most needed (i.e., focused use of state resources). Figure 3 provides an example of more widespread TSI identification with greater reliance on local improvement processes and relies on a mechanism of public awareness and support to bring about the changes to the system and student outcomes. Please note that these examples are intentionally extreme (and may not be entirely compliant with all aspects of the law in their current states). They are intended to illustrate how possible identification approaches require justification based on a state's theory of action and capacity. Each underlying theory of action is described in more detail following the figures.

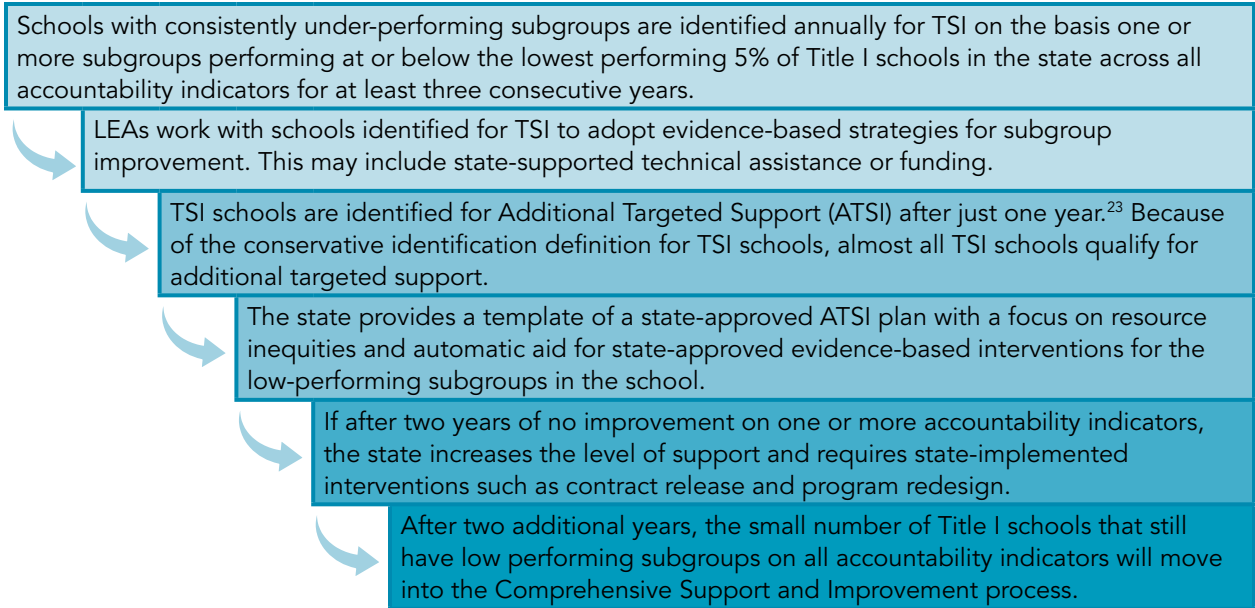


Figure 2. Example Process based on a Theory of Action Prioritizing Moderate Identification with Strong State Support

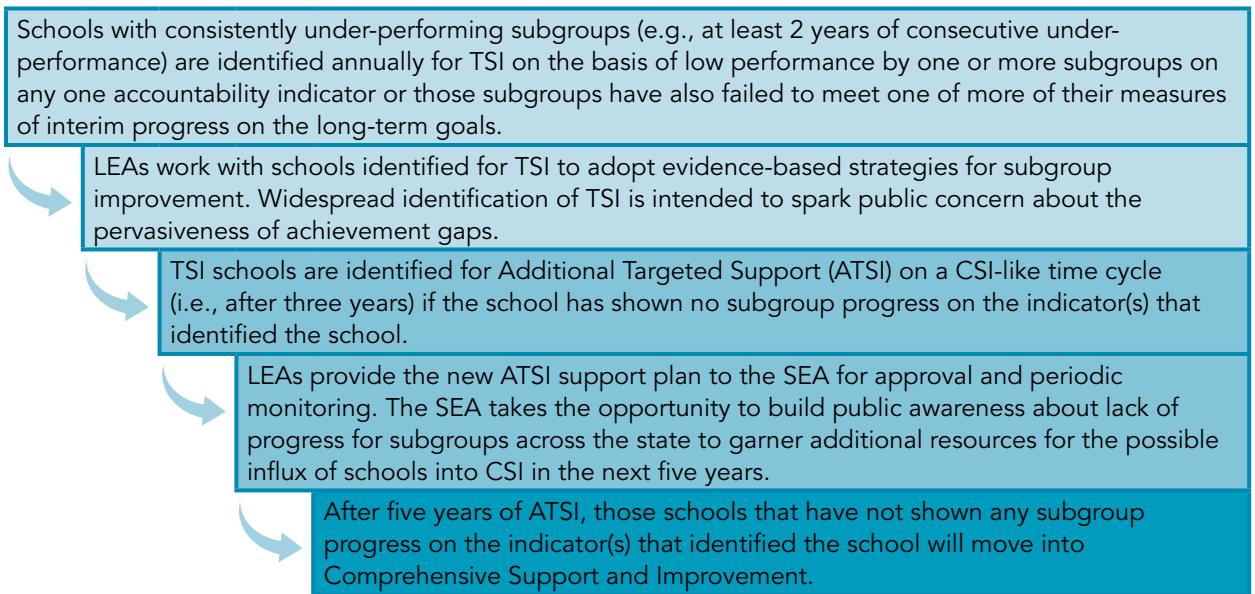


Figure 3. Example Process based on a Theory of Action Prioritizing Widespread Identification with Strong Local Support

It is apparent from the examples provided in Figures 2 and 3 that the strategies for identifying TSI schools must be directly related to the theory of action for change and also the capacity and resources of the state to support schools. In Figure 2, the identification and exit criteria for TSI and ATSI are very intensive; state involvement with TSI schools happens quickly and becomes increasingly rigorous. The theory of action in Figure 2 is based on the idea that if a state identifies

²³ States should consider their theory of action and capacity to support school or district improvement efforts in light of statutory requirements and USED feedback when designing their accountability systems.

the TSI and ATSI schools that are most in need of support, then the state will be able to better direct resources to those schools. The increasing intensity of state intervention and support over time will then result in schools being better equipped to sustain meaningful subgroup improvement. On the other hand, Figure 3 illustrates a system where identification for TSI would be widespread, with the entrance and exit criteria relatively more moderate. The theory of action driving the system in Figure 3 is based on the idea that if states publicly highlight pervasive and persistent achievement gaps, then there will be a greater sense of urgency in schools and LEAs to improve. Additionally, increased public awareness would also garner additional public support and funds to eventually provide comprehensive support and intervention to a potentially high volume of schools down the road—likely about a decade after the system is in place. While these two examples represent fairly extreme cases, the purpose of providing them is to illustrate how the school identification scheme must be closely tied to the state’s theory of action and its access to resources and capacity to support schools.

POLICY LEVERS IN DESIGNING SYSTEMS OF IDENTIFICATION

Well-documented and persistent achievement gaps are a common concern across the country. States have been grappling with how to improve subgroup achievement throughout the No Child Left Behind and ESEA waiver years, and the coming implementation of ESSA will likely be no different. Therefore, states should be rightfully concerned with how to design a system of identification for targeted support that strikes the right balance of highlighting true inequities in achievement while also being able to adequately serve all schools identified as in need of Additional Targeted Support and Comprehensive Support and Improvement. This section contains a list of seven policy levers in creating a system of identification that can be used to create a coherent and effective identification scheme for any state context.

1. *State definition of consistently underperforming subgroups*

The definition of “consistently underperforming” is completely within the state’s control. Because ATSI schools can be a subset of TSI schools, the state can influence the number of schools that may ultimately be identified for ATSI (and later potentially CSI) with the definition of consistently underperforming. If the state wants to moderate the rate of identification, they may consider

- using a conjunctive approach, where subgroup performance must be below a certain threshold on all or many indicators, and/or
- requiring multiple years of low-performance on the same indicator(s) before identification.

2. *Timing of identification for Additional Targeted Support (ATSI)*

While the mechanism for identifying schools for Additional Targeted Support is fairly prescriptive in the law—i.e., any school for which the performance of one or more

subgroups on its own would place the school in the bottom 5 percent of Title I schools—the state may propose an extended number of years a school must be identified for TSI before they are eligible for identification of Additional Targeted Support, we recommend states present a strong rationale and evidence base for the timeline.

3. Consider including subgroup performance in overall rating

If states choose to include the performance of subgroups in their system of annual meaningful differentiation, then it is likely that threshold for performance that defines the bottom 5 percent will be lower than if subgroup performance was not included. This may limit the number of schools that are identified for Additional Targeted Support from the TSI pool.

4. State definition of exit criteria for ATSI schools

The state must define statewide exit criteria for ATSI schools and therefore has the flexibility to require whatever evidence of subgroup success they wish in order to align with the state’s theory of action and resources for support. A state that wants to set relatively rigorous exit criteria might match the entrance criteria to the exit criteria. This is good way to provide coherence within the system and communicate clear expectations of performance to schools. A state that wants to set very rigorous exit criteria may require a match between exit and entrance criteria **and** specify an absolute target that defines a high bar for performance. A state that wishes to be more behaviorally- or progress-focused on the exit criteria may only require that the subgroups demonstrate improvement on one or more indicators, rather than setting a fixed bar for performance. If more progress-oriented, it is important to consider the consequences of specifying these kinds of expectations for exit from ATSI and potential impact on the long-term performance of schools. In addition to considering specific impacts of exit criteria on performance trends, ATSI exit criteria will have a direct impact on the number and types of schools that cascade into CSI identification. We recommend states model data to determine the impact of ATSI exit criteria and how that interacts with support capacity.

5. Timing of identification for Comprehensive Support and Improvement (CSI) for ATSI schools

States have the freedom to define the number of years after which ATSI schools are automatically re-classified as CSI schools. States understand that meaningful and lasting changes to school structures and student performance take time and may wish to set a reasonable ATSIàCSI re-classification schedule that aligns with that understanding. One example of this might include specifying “hold harmless” criteria (and associated timeframe) for those schools that demonstrate improvement but do not exit ATSI.

6. Differentiate within CSI schools based on entry pathway/severity of concern

In the case where high numbers of schools are identified for CSI due to the possible influx of re-classified ATSI schools, states may want to consider how they can manage their resources efficiently and effectively to support all CSI schools. This may mean SEAs provide differentiated support to schools depending on whether they were classified on the basis of all students or on the basis of low subgroup performance. States may even want to divide CSI identification into two separate summative determinations to make the difference more transparent to schools and to the public.

CONCLUDING REMARKS

The purpose of this first paper in a series of two regarding systems of school identification is to provide states with clear information regarding the requirements of the law, recommendations when aligning strategies to the law, and state policy levers for designing a system that is coherent with the state's theory of action. The most important takeaway from the technical advice provided within is that states should be concretely aware of the impact that their policy decisions and business rules will make on how and which schools will be identified within their ESSA identification system. On top of this, states should have a clear rationale associated with each of their decisions regarding identification that is coherent with the state's theory of action for school improvement and support. Once systems of school identification have been articulated and implemented, the second paper in this series, *State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System* (D'Brot, Lyons, & Landl, 2017), can be used to guide states in monitoring and evaluating the results of their accountability systems.



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