



Leveraging School Improvement to Advance Equity

In an effort to advance equity, the Every Student Succeeds Act (ESSA) provides federal funds to assist states and districts in meeting the needs of traditionally underserved students, including students of color, students from low-income families, English learners, students with disabilities, and students who are homeless or in foster care. In exchange for robust data reporting, increased transparency, and a commitment to improve underperforming schools, ESSA provides states and districts with the financial flexibility to use federal ESSA funds on a wide range of actions.

Traditionally, district leaders have limited federal funds to expenditures that clearly met federal compliance requirements, such as funding additional academic interventions, due to concerns about triggering federal audits or oversight. While the law's requirement to ensure that federal funds supplement, and do not supplant, state and local funds remains, district and school leaders are no longer bound by accounting restrictions that required to them to make cumbersome financial demonstrations.¹ As a result, district and school leaders now possess greater latitude to invest ESSA funds in ways they think are most likely to benefit underserved students, including aligning their use of ESSA funds with the district's existing strategic priorities. This guide is intended to help district leaders disrupt the compliance mindset and inertia that have characterized traditional implementation of federal grants and leverage federal funding and programs in service of a more equitable education system.

This guide functions differently from the other briefs in this series, which are focused on using multiple levers (including but not limited to school improvement) within ESSA to advance different equity strategies throughout the district, not only in schools identified for improvement under ESSA. Given the new flexibility and responsibility that ESSA creates for district leaders around school improvement, this brief offers a deeper treatment on this topic.



What's the Opportunity?

ESSA establishes parameters for how states should identify and respond to the schools most in need of improvement, known as comprehensive support and intervention (CSI) schools and targeted support and intervention (TSI) schools. Unlike in previous iterations of federal education legislation (i.e., No Child Left Behind), ESSA does not identify or prescribe specific school improvement strategies or goals. Rather, states and districts are responsible for determining interventions

and supports tailored to their unique context. With this shift to greater local responsibility for school improvement,

district leaders must urgently advocate for a new vision and dramatic shifts in the way the district supports CSI and TSI schools and chart the way to improved outcomes for the students in these schools.

Integrating school improvement efforts with existing district strategies and identifying high-leverage interventions can help ensure the students in these schools have the opportunity to reach their full potential and disrupt cycles of academic failure that, without meaningful improvement, will trigger state intervention.

TABLE 1: SCHOOL IMPROVEMENT CATEGORIES AND CRITERIA UNDER ESSA

	CRITERIA FOR SCHOOL INCLUSION	INTERVENTION PLAN
COMPREHENSIVE SUPPORT AND IMPROVEMENT (CSI)	<ul style="list-style-type: none"> • Lowest-performing 5 percent of Title I schools. • All public high schools that fail to graduate 67 percent or more of their students. • Additional Targeted Support and Improvement (ATSI) Title I schools that fail to improve. 	<ul style="list-style-type: none"> • School districts must work with stakeholders to develop and implement an improvement plan that is based on a needs assessment and resource review for each CSI school. • Any CSI school that fails to improve within a state-determined number of years (not to exceed four years) shall be faced with more rigorous state-determined action. • State departments of education establish exit criteria for CSI schools and monitor and periodically review progress made by school districts toward improving CSI schools.
TARGETED SUPPORT AND IMPROVEMENT (TSI)	<ul style="list-style-type: none"> • Schools where a subgroup of students is “consistently underperforming,” as defined by the state. 	<ul style="list-style-type: none"> • Schools develop and implement a school-level plan in partnership with stakeholders. • Although CSI schools are subject to plans crafted and implemented by the district, TSI plans are developed and implemented by the school rather than the district. • School districts must approve the school’s TSI plan and are responsible for monitoring implementation. • If a TSI school fails to improve after a certain number of years (as determined by the district), the district must take additional action.

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	CRITERIA FOR SCHOOL INCLUSION	INTERVENTION PLAN
ADDITIONAL TARGETED SUPPORT AND IMPROVEMENT (ATSI)	<ul style="list-style-type: none"> • TSI schools where the performance of any subgroup of students on its own would lead to CSI identification as one of the lowest-performing 5 percent of Title I schools. 	<ul style="list-style-type: none"> • Schools develop and implement a school-level plan in partnership with stakeholders. • ATSI plans are developed and implemented by the school rather than the district. • School districts must approve the school’s ATSI plan and are responsible for monitoring implementation. • If ATSI school fails to improve after a certain number of years (as determined by the district), (1) any ATSI Title I school is converted to a CSI school and (2) any ATSI non-Title I school is subject to additional action by the district.

School and district leaders should use ESSA as an opportunity to design and fund efforts to truly improve outcomes for students. Four ESSA requirements for state-identified low-performing schools – plan development and approval, resource reviews, needs assessments, and evidence-based interventions – can be used to identify root causes behind school performance, identify proven strategies to improve student experiences and outcomes, and chart a path forward.

- **Plan Development and Approval:** In partnership with stakeholders (including families, teachers, and principals), districts must develop plans for how they will improve CSI schools. These plans will then be approved and monitored by the state education agency. For TSI and ATSI schools, school leaders must develop these plans in consultation with local stakeholders, and district leaders will approve and monitor plans, develop exit criteria, and set expectations for additional intervention if schools do not exit improvement status. As part of plan development and approval, district leaders have an opportunity to integrate school improvement with existing district priorities and take into consideration factors like budget, capacity, sustainability, communication, and continuous improvement.
- **Resource Reviews:** For CSI and ATSI schools, district leaders must conduct resource reviews to analyze the distribution of existing resources, including financial allocations, to struggling schools, and they should use this data to inform potential restructuring of resource use and address this in their CSI and ATSI plans. District leaders may also choose to conduct resource reviews for TSI schools, though this is not required by ESSA.
- **Needs Assessment:** For CSI schools, district leaders must conduct and use findings from comprehensive needs assessments for schools, through which a school should consult with a broad range of stakeholders, including parents, school staff, and community, and examine relevant data and information on academic achievement, resource inputs, access and opportunities, and other measures (including those outside the K-12 sphere as needed, such as pre-K access)

to understand gaps and root causes. District leaders may also choose to conduct needs assessments for TSI and ATSI schools, though this is not required by ESSA.

- **Evidence-Based Interventions:** ESSA requires schools that have been identified for intervention and that receive funding under Sec. 1003 to use at least one evidence-based intervention from the first three tiers of evidence (tiers 1-3) as defined within the statute:¹
 1. Strong evidence: intervention has at least 1 well-designed and well-implemented experimental study (i.e., randomized)
 2. Moderate evidence: intervention has at least 1 well-designed and well-implemented quasi-experimental study (i.e., matched)
 3. Promising evidence: intervention has at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias
 4. Strong theory: intervention demonstrates rationale based on high-quality research or positive evaluation with ongoing efforts to examine intervention effects (this tier may not be used for school improvement activities using ESSA funds but may be used for other activities, such as work funded by Title II)

Schools that have been identified for improvement but that do not receive funding under Sec. 1003 may use interventions from any of the four tiers of evidence in their plans.



Overcoming Potential Barriers to Equity

- Having the expertise and flexibility to address root causes based on the findings from resource reviews and needs assessments
- Amending district policies and contracts to enable implementation of evidence-based interventions that address the needs identified by resource reviews and needs assessments (e.g., collective bargaining agreements that restrict the movement of teachers between schools, limited school leader autonomy to make changes based on the findings from resource reviews and needs assessments).
- Restructuring state education agencies and district central office in support of strategic priorities and student needs rather than around the implementation of federal funding streams.
 - o This will require increased collaboration and some trade-offs (i.e., eliminating positions/FTEs dedicated solely to tracking and compliance).
- Addressing the lack of coherence among and across district strategies and programs by focusing and aligning district priorities so that they can achieve the greatest impact in improving low-performing schools.
- Equitably distributing resources to low-performing schools that need them the most.

¹ *The Evidence Provisions of the Every Student Succeeds Act*, Results for America, 2016, <http://results4america.org/wp-content/uploads/2016/11/ESSA-evidence-provisions-explainer-7.22.16-Update.pdf>.



What Should I Look for in My State Context?

All states were required to submit state ESSA plans to the US Department of Education (USDOE), so district leaders interested in driving strategy through school improvement should familiarize themselves with the relevant aspects of their state plan² related to this equity priority. Questions that district leaders can ask about their state plans and of their broader state context include:

- What is my state's process to approve plans for CSI schools? Is my state requiring a specific needs assessment template?
- Will school improvement funds be distributed via formula grants, competitive grants, or a hybrid approach? On what timeline will funds be distributed?
- Is my state taking the optional 3 percent Title II set-aside for school leaders? If so, how are they planning to use this funding? How will these be distributed?
- Is my state offering a planning year for schools that have been identified for support and improvement? Are there grants and technical assistance associated with the planning year?
- Does my state have a list of pre-approved interventions or providers? Is my district required to use these?
- What technical assistance is my state offering in school improvement (e.g., regional service providers)?
- What are my state's exit criteria for CSI schools? What's the timeline for exiting? What are the consequences for not exiting?

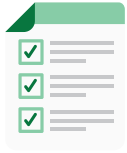


Turning ESSA's Requirements into Opportunities

This table summarizes ESSA requirements for districts and provides illustrative examples of how district leaders could move beyond meeting ESSA's requirements to using the law to drive their strategic priorities. Each box includes a reference to the related ESSA statutory provision found in the ESSA Provisions section of this brief (see p. 8) so that district leaders are able to validate any actions that they take to improve low-performing schools.

² All state plans submitted to the US Department of Education are available here: <https://www2.ed.gov/admins/lead/account/stateplan17/statesubmission.html>

SET PRIORITIES AND MAKE DECISIONS



WHAT DOES ESSA REQUIRE DISTRICTS TO DO?

HOW COULD DISTRICT LEADERS BUILD ON ESSA REQUIREMENTS?

Districts are required to conduct resource reviews for schools that are identified for comprehensive support and improvement and additional targeted support and improvement.ⁱⁱ

District leaders can use both Title I and Title II funds to audit teacher equity and to address the equitable distribution of effective teachers.^{iv} District leaders may choose to also conduct resource reviews for TSI schools.

Districts must conduct needs assessments for schools that are identified for comprehensive support and improvement.ⁱⁱ

District leaders should also consider conducting needs assessment for schools identified for TSI and ATSI or other non-identified low-performing schools.

District leaders should include questions in needs assessments that will illuminate the root causes for challenges, and they should consider questions that dig into information outside of the typical academic student outcome data. Depending on the district’s priorities, needs assessments could capture information on issues such as instructional material quality, school culture, teacher effectiveness, or other factors.

In addition to conducting needs assessments of low-performing schools, districts should conduct a needs assessment of the school district’s central office capacity to identify district-level improvements that may be necessary to unlock improvement at low-performing schools.

Districts must use evidence-based interventions to improve student outcomes in schools identified for comprehensive support and improvement and targeted support and improvement.^{ii,iii}

District leaders could build upon state guidance for evidence-based interventions to align interventions with district strategy and district capacity needs. This can also include developing criteria to identify effective partners.

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	WHAT DOES ESSA REQUIRE DISTRICTS TO DO?	HOW COULD DISTRICT LEADERS BUILD ON ESSA REQUIREMENTS?
<p>SET PRIORITIES AND MAKE DECISIONS</p> 	<p>School districts must develop and implement CSI plans in collaboration with principals, teachers, and parents.ⁱⁱ</p>	<p>District leaders can engage the local community to analyze community assets and available partnerships for the implementation of CSI and TSI interventions aligned to district priorities.</p> <p>Districts should drive engagement beyond the ESSA-required stakeholder groups and consider what meaningful, sustained engagement looks like to help the school district achieve its priorities.</p>
	<p>School districts must approve TSI school-created plans and monitor TSI schools' progress towards plan goals.^{v,vi}</p>	<p>District leaders can set the terms and expectations for what TSI schools should include in their plans (e.g., creating a template).</p> <p>District leaders can create teams to approve TSI plans that should include members from various district departments to ensure alignment across offices and may also include external stakeholders.</p>
	<p>School districts must establish exit criteria for TSI schools.^{v,vi}</p>	<p>In addition to monitoring the progress of TSI schools, district leaders should also monitor the progress of any CSI schools located in the district. Although the state is technically in charge of monitoring CSI schools, district leaders can create a culture of continuous improvement and ensure that both TSI and CSI schools are operating in that vein.</p>

Using Flexible Funding

District leaders should target school improvement funds in ways that align with and advance district priorities and leverage other federal funds (e.g., Titles II, III, IV) to support school improvement efforts. In order to understand the funding flexibility associated with different district priorities and equity levers, review the guides associated with your district's identified focus areas.



Resources

- Council of Chief State School Officers, Principles of Effective School Improvement Systems <https://www.ccsso.org/resource-library/ccsso-principles-effective-school-improvement-systems>
- The Opportunity Institute, Meaningful Local Engagement under ESSA http://partnersforeachandeverychild.org/wp-content/uploads/2017/08/LEA-and-SL-Handbook_8.10.17.pdf
- Results for America, Evidence Based Provisions Explainer <http://results4america.org/wp-content/uploads/2016/11/ESSA-evidence-provisions-explainer-7.22.16-Update.pdf>
- Johns Hopkins University, Evidence for ESSA <https://www.evidencefoessa.org>



ESSA Provisions

This table provides statutory references for district leaders so that they can draw upon ESSA to validate district changes that promote improving low-performing schools in service of equity.

	ESSA STATUTORY LANGUAGE
i	<p>A special rule within ESSA’s supplement, not supplant provision changes the financial accounting methodology as follows:</p> <p>‘(1) In general.—A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.</p> <p>(2) Compliance.—To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.</p> <p>(3) Special rule.—No local educational agency shall be required to—</p> <p>(A) identify that an individual cost or service supported under this part is supplemental; or</p> <p>(B) provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency’s compliance with paragraph (1).” [Sec. 1118(b)(1)-(3)].</p>

<p>ii</p>	<p>For all schools that the state identifies as needing comprehensive support and intervention (CSI) in a district, the district must work with “stakeholders (including principals and other school leaders, teachers, and parents)” to develop a plan that:</p> <ul style="list-style-type: none"> “(ii) includes evidence-based interventions; (iii) is based on a school-level needs assessment; (iv) identifies resource inequities, which may include a review of local educational agency and school-level budgeting, to be addressed through implementation of such comprehensive support and improvement plan; (v) is approved by the school, local educational agency, and State educational agency; and (vi) upon approval and implementation, is monitored and periodically reviewed by the State educational agency.” [Sec. 1111(d)(1)(B)(ii)-(vi)] <p>For schools identified for additional targeted support and improvement (ATSI), school districts must also “identify resource inequities (which may include a review of local education agency and school level budgeting)” [Sec. 1111(d)(2)(C)].</p> <p>Targeted support and improvement (TSI) schools where the performance of any subgroup of students on their own would lead the state to identify the school for CSI must also conduct a resource review [Sec. 1111(d)(C)]. If these TSI schools are Title I schools, they can become CSI schools if they do not exit TSI status (exit status for TSI schools is determined by the local educational agency). And in the first year of identification (2017-2018), states “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 [the lowest-performing 5 percent of all Title I schools] even without having those schools be identified as TSI schools first [Sec. 1111(d)(2)(D)].</p>
<p>iii</p>	<p>For all schools that the state identifies as needing targeted support and intervention (TSI), the school must develop a plan that:</p> <ul style="list-style-type: none"> “(ii) includes evidence-based interventions; (iii) is approved by the local educational agency prior to implementation of such a plan; (iv) is monitored, upon submission and implementation, by the local educational agency; and (v) results in additional action following unsuccessful implementation of such plan after a number of years determined by the local educational agency.” [Sec. 1111(d)(2)(ii)-(v)] <p>TSI schools where any subgroup of students on its own would lead to identification by the state as a CSI school must also conduct a resource review [Sec. 1111(d)(C)].</p>

iv	<p>Title II funds can be used by districts to develop and implement initiatives “to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within-district equity in the distribution of teachers” [Sec. 2103(b)(3)(B)].</p>
v	<p>Districts must create annual report cards that include the same information as the state’s report card (with the exception of not needing to report on NAEP scores) “as applied to the local educational agency and each school served by the local educational agency” [Sec. 1111(h)(2)(C)]. These requirements include establishing exit criteria for schools identified for improvement [Sec. 1111(h)(1)(C)(i)(VI). Additionally, local plans must describe how districts will their responsibilities regarding targeted support and improvement schools [Sec. 1112(b)(3)], which includes how the district will monitor TSI schools and how many years the school has to improve before additional action is required [Sec. 1111(d)(2)(B)(iv)-(v)].</p>
vi	<p>Each school identified for targeted support and improvement that includes the following components:</p> <ul style="list-style-type: none"> “(i) is informed by all indicators described in subsection (c)(4)(B), including student performance against long-term goals; (ii) includes evidence-based interventions; (iii) is approved by the local educational agency prior to implementation of such plan; (iv) is monitored, upon submission and implementation, by the local educational agency; <p>and</p> <ul style="list-style-type: none"> (v) results in additional action following unsuccessful implementation of such plan after a number of years determined by the local educational agency” [Sec. 1111(d)(2)(B)(i)-(v)]