ESSA and School Improvement

Promise to Practice

An Independent Peer Review of the Progress to Date on Identifying and Supporting our Nation's Lowest Performing Schools

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Executive Summary

Project Background and Overview

Three years ago, the federal government, with the passage of the Every Student Succeeds Act (ESSA), shifted the responsibility for identifying and intervening in our chronically underperforming schools to the states. With a limited federal role, one must now look individually at all 50 states to understand how our nation is addressing the achievement gap. The consequences are sobering – more than 9 million students attend schools that do not meet anyone’s standard for what is acceptable. The overwhelming majority of these children are students of color from low-income families.¹

We know from the decades-long School Improvement Grant (SIG) program that turning around our lowest performing schools is hard, extremely complex work. There are no silver bullets and we have made little progress to date. Where it works, it requires leadership and community buy-in and, along the way, the ability to make unpopular decisions.

Only 17 states met our threshold for having enough publicly available information to be reviewed.
The Collaborative for Student Success (Collaborative) in partnership with HCM Strategists (HCM) set out to identify and lift up the promising practices being adopted in the implementation of ESSA that were worthy of consideration by the field. This work, *Check State Plans: Promise to Practice*, is a natural progression from last year’s independent peer review conducted by the Collaborative and Bellwether Education Partners of every state’s new accountability plan, titled *Check State Plans*.

This analysis is grounded in the collective wisdom and experience of peer reviewers from across the country who have been deeply engaged in this work. These former chiefs, district leaders, school improvement experts, civil rights advocates, English language and special education leaders were recruited to conduct an independent review of the progress made to date on school improvement under each state’s renewed context for school accountability. Only 17 states met our threshold for having enough publicly available information to be reviewed: Arizona, Colorado, Connecticut, Florida, Georgia, Idaho, Illinois, Indiana, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Dakota, Tennessee and Texas.

Arguably, school improvement is an area of public education reform with one of the least conclusive evidence bases, growing political tension and a gigantic need for extra resources. This work is not done in a vacuum; compounding the challenges, many states face funding deficits, teacher shortages and safety issues. Nonetheless, it is concerning that after three years and a quarter of the way through the school year, only 17 states are ready to identify and support their lowest performing schools.

Those involved in this effort believe it is imperative that we shine a bright spotlight on this very concrete and actionable opportunity to truly begin to drive an equity agenda. The hope is that the remaining 33 states and the advocacy community that supports them will consider both the promising practices from their colleagues across the United States as well the recommendations for creating a policy environment where this work can succeed.

**Methodology**

In spring 2018, the Collaborative partnered with Education First (EdFirst), to first survey and then interview state education leaders to document the timeline and activities states had set in motion to identify and support schools in need of comprehensive support. The results from those interactions with over 40 state leaders were used to identify the states ready for this review. In addition, in August 2018, HCM completed a four-month audit of state department of education websites to gather, at a minimum: the state’s application for districts to receive school improvement funding, the state’s scoring rubric for the application and the state’s guidance for districts or schools to develop and implement their improvement plans. HCM, in partnership with the Collaborative’s leadership team and a group former chiefs and school improvement experts, developed a rubric reviewers used to evaluate states as exemplary, strong, adequate, needs improvement, weak, or not available across eight policy levers:

1. Coherent Vision for Improving Outcomes
2. Strategic use of Funding and Alignment of Resources
3. Rigorous Review Process
4. Continuous Improvement, Monitoring and Evaluation
5. Evidence-Based Interventions
6. Capacity Building and Autonomy
7. **Engaging Stakeholders**

8. **Sustaining Outcomes**

The results by state can be found here.

**Troubling Trends**

- **Equity is not prioritized in half the states.** While nearly every state reviewed referenced equity in some way, fewer than half clearly stated equity as a focus and required districts to demonstrate how they would address inequities – such as providing more access to high quality teachers, rigorous curriculum and enrichment opportunities.

- **Many states are not taking their new oversight role seriously.** There is not enough emphasis overall on the quality of the application as a whole or on the extent to which the district has shown that it is addressing the needs of the identified school as determined through the comprehensive needs assessment. As a result, it is hard to see how states will be able to distribute funds in a strategic manner or reach the schools and districts with the greatest need.

- **It will be hard to tell what’s working.** It is unclear in nine states the degree to which they are utilizing a robust, data-driven process to monitor district implementation.

- **A strong sustainability plan is missing from all but one of the states reviewed.**

**Promising Practices from The High Performers**

- **Louisiana** has committed to and clearly articulated a statewide improvement strategy, integrating all their efforts around a vision that every student has access to grade level instruction daily, using a rigorous and high-quality curriculum every teacher has been trained to use.

- **Colorado** developed a streamlined application to award services and funding. The application is organized into four pathways: exploration supports, district designed and led, offered supports and continuation. Each pathway has different criteria and methods of awarding funds. The ultimate intent is to develop a robust process of matching schools’ needs with rigorous, evidence-based strategies and adequate resources.

- **Nevada** explicitly asks that districts include in their application narrative a description of how their chosen strategy or strategies for low performing schools address equity gaps.

- **New Mexico** requires districts and schools to use NM-DASH (Data, Accountability, Sustainability and High Achievement), a web-based action-planning, process management tool to help them develop school improvement plans and identify evidence-based interventions. This system aligns the states accountability and educator evaluation systems with the school improvement efforts. Districts and schools are required to check in with officials continuously and to use data from NM-DASH to gauge the effectiveness of the improvement strategies.

- **Tennessee’s** school improvement application serves as a step-by-step primer for districts in how to create a detailed needs assessment, identify common themes, conduct a root cause analysis to prioritize the areas of greatest need and then develop goals and an implementation plan to address each high-priority area.
**Leadership Approaches**

Three leadership approaches emerge from our analysis. No doubt, all three approaches have strengths, weaknesses and the ability to succeed. The key is to be explicit about the philosophy and then to follow through with a coherent, measurable plan that is known by all of the stakeholders.

**The State Leadership Approach—**

Chiefs in these states have outlined an explicit and coherent vision for school improvement, and for the most part have integrated it throughout all their efforts. They’ve strived for consistent messaging around school improvement, developed a system to monitor the progress, and they’ve used competitive funding to prioritize resources to districts that have demonstrated a commitment to real improvement. The state is leading from the front and communicating a need for urgent change. Peers paid special attention to the degree to which these states’ theories of action were front-and-center throughout all of their school improvement materials and articulated an equity focus. These states are Louisiana, Massachusetts, New Mexico, and Tennessee and on average they scored the highest in our review.

**The Partnership Approach—**

These states view themselves as partners with districts, and try to walk the line in acting as both a coach and a referee. They focus on enhancing district capacity throughout the improvement process to make decisions and serve all students. Rubrics are often used to guide conversations around the improvement process rather than grade the quality of the applications and state staff generally work with districts to complete the plan if it lacks initially. Many of these states are establishing progress monitoring check-ins with districts, where the conversation is geared around “how can we help.” Peers looked particularly at whether these states clearly defined roles and responsibilities for school improvement at the state, district and school levels. There are five states in this category: Connecticut, Idaho, Minnesota, North Dakota and Nevada.

**The District Leadership Approach—**

These states view their role as creating a foundation for improvement and expect district leaders to take primary responsibility for developing and implementing their school improvement strategy. As a result, these states often employ very specific school improvement frameworks, planning tools, or funding guidance. These states lean heavily on a local needs assessment or school improvement application to make funding determinations, and will generally point districts to evidenceforessa.org or a state-created resource hub for intervention recommendations, but will not prioritize a specific strategy. Peers paid special attention to the degree to which these states had completed a high-quality suite of school improvement guidance and foundation documents and made it publicly available. There are eight states in this category: Arizona, Colorado, Georgia, Florida, Illinois, Indiana, New York and Texas.

**Conclusion**

For some, this report will confirm their fears that the wide latitude under the new law will lead to the path of least resistance. There is no doubt that in some states that is true. However, our hope is that this review is a useful tool to state education leaders, educators, stakeholders and advocates as they grapple with the right leadership models, policies and interventions to dramatically improve their lowest performing schools. In a noisy political environment that changes daily, this is one equity gap that if given the prioritization, rigor, energy and resources it deserves, could be closed.
It should come as a surprise to no one that America's public education system, promoted as "the great equalizer," has yet to fulfill its promise to all students. What is shocking, however, is how little we know as a country about how to successfully intervene in and turn around our lowest performing schools. At a time when our society is laser focused on equity and the lack thereof, it is incumbent upon us to shine a bright light on the opportunities that exist to do better and to support those states and districts who are endeavoring to set bold goals and hold themselves to high expectations. Innovative policies and practices alone will not transform a school, but in the absence of them, real change becomes all the more daunting.

Under the Every Student Succeeds Act (ESSA), enacted into federal law in 2015, there are two tiers of classification for intervention in our lowest performing schools: comprehensive and targeted. To classify schools in need of comprehensive support, the state identifies the academically lowest performing 5 percent of Title I schools — those serving a large population of low-income students — along with any high school where less than 2 in 3 students graduate in four years. In some states these schools receive an “F” rating, indicating that the vast majority of the students enrolled did not pass the state test or meet other benchmarks proscribed as part of the state's accountability system. Targeted support schools are identified using criteria set by the state to address underperformance by one or more subgroups of students. The 2018-2019 school year marks the deadline for states to make public those schools that they are identifying for improvement.

Over nine million children attended our country’s low performing schools in 2013-14; of these, close to 70 percent were students of color and 75 percent were of low socioeconomic status. In 2018, through ESSA, the federal government provided over $1 billion dollars in school improvement funding, aimed to support these identified schools. For the first time, states have the flexibility to customize how they want to identify, support and intervene in these schools. This work is not done in a vacuum; compounding the challenges, many states face funding deficits, teacher shortages and safety issues.

“We want to highlight where states are doing well and shine a light on when they aren’t achieving their biggest potential.”

—Peer Reviewer
HCM Strategists (HCM), in partnership with the Collaborative for Student Success (Collaborative), recruited individuals with extensive experience in education policy and substantial expertise in school improvement to serve as peer reviewers to analyze the work that has been done by states in this area since the passage of ESSA three years ago.

It is important to remember just how stark the disparity between America’s highest and lowest performing schools can be. A quick look at two schools, both located within Chicago and separated by an hour drive, makes it easy to see.

In the first school, nearly 80 percent of students were proficient on the 2018 administration of the SAT, the high school test for Illinois. This high school offers students 26 AP courses, six foreign languages and a range of liberal arts electives comparable to most elite universities, coinciding with a 97 percent graduation rate.

In the second school, barely 3 percent of students were proficient on the 2018 administration of the SAT. This school has been identified for intervention throughout the past decade. Opportunities to engage with a rigorous college level curriculum are minimal and AP/IB courses are almost nonexistent.

The two Americas that exist in these two schools represent the equity challenge of our time. Few things are more indicative of the injustice in our education system than the inequity of school facilities. Students in some neighborhoods often start their day moving through a metal detector entering a school with a leaky roof, old textbooks and outdated technology. At the same time, their peers down the road attend schools with extensive libraries, computer and science labs with the latest technology and a well-equipped gym, as well as enrichment opportunities in art, music and a range of languages. And we know the disparity is not confined just to school. Challenged buildings are found in distressed neighborhoods with disproportionate numbers of students living in poverty or homelessness, learning English as an additional language and facing a variety of disabilities.

In a noisy political environment, it is hard to create a sense of urgency around any one thing. However, it is time to match the highly charged rhetoric around equity with actionable, concrete places where the movement can touch down and make a difference: our nation’s lowest performing schools.
As states have transitioned to their new accountability systems and started identifying schools under their new metrics, it is time to ask: are they rising to the difficult but critical challenge of driving real movement toward educational equity, or are we looking at another year of status quo? This year, the Collaborative and HCM launched Promise to Practice, a natural progression of the Check State Plans initiative whereby the Collaborative and Bellwether Education Partners conducted the only independent peer review of every state's new accountability plans under ESSA.

HCM and the Collaborative developed a rubric (located in Appendix A) to evaluate state approaches to school improvement aligned to the critical levers for change. The rubric was reviewed by former state chiefs, multiple school improvement experts and national policy experts. Our goal was to ensure it was comprehensive and that it would yield an overall reflection of the state's approach including its commitment to equity, strengths and areas for improvement.

The turnaround components include the following and the findings and recommendations that follow are grouped by these categories:

1. Coherent and Aligned Vision for Improving Outcomes

2. Strategic Use of Funding and Alignment of Resources

3. Rigorous Review Process

4. Continuous Improvement, Monitoring and Evaluation

5. Evidence-Based Interventions

6. Capacity Building and Autonomy

7. Engaging Stakeholders

8. Sustaining the Outcomes

In spring 2018, HCM and the Collaborative partnered with Education First (EdFirst), a national education policy research and strategy firm, to survey and interview state education leaders to document the timeline and activities states have set in motion to work with struggling schools under ESSA. EdFirst used this information to create objective, one-page snapshots on each state that summarize key facts, decisions and next steps for school improvement strategies. In addition, the snapshots depict the changes states are making under the new law to support their underperforming schools - something that cannot easily be gleaned from publicly available information.
HCM and the Collaborative used the results from the survey to narrow the list of states to be chosen for this review. In addition, in August 2018, HCM completed a four-month audit of state department of education websites to gather, at a minimum:

1. The state’s application for districts to receive school improvement funding;
2. The state’s scoring rubric for the application; and
3. The state’s guidance for districts or schools to develop and implement their school improvement plans.i

Each of these documents represent one of many opportunities states have to promote strong school improvement strategies. Ultimately, 17 states were selected for the review given that they had the above listed information publicly available. This information, plus the EdFirst snapshots, the state’s ESSA plan and a list of additional resources ii, were included in state portfolios for peer reviewers to use during their review, which occurred in September 2018.

Together, HCM and the Collaborative recruited and convened a bi-partisan network of 24 peer reviewers – former chiefs, district leaders, school improvement experts, civil rights advocates, English language and special education leaders. Together, we sought to ascertain:

1. The progress states have made implementing school improvement provisions under ESSA;
2. Whether states are utilizing their autonomy to implement new, comprehensive and innovative approaches to intervene in low-performing schools; and
3. The trends and best practices in state approaches.

This report is less a “state of the states” analysis and more a “state of what we were able to review” about state school improvement activity. We can’t always clearly document effective actions being taken in states, as much of this hard work is done behind closed doors. However, we believe this opportunity is too important to shy away from the challenge of examining what is available in an attempt to share what can be learned from those doing this work.

As we examine the state’s current goals and strategies, it is important to understand recent history and its impact on the evolution of school improvement efforts. Established under the Bush administration’s No Child Left Behind (NCLB) Act, the School Improvement Grant (SIG) program was designed to provide funding to turn around the nation's

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i The guidance could include, but was not limited to: the state’s school improvement manuals, a needs assessment, regulations or guidance regarding evidence-based interventions, a state’s theory of action to improve low performing schools and a model exemplary plan.

ii Resources included links to the states school improvement webpage(s), the states ESSA plan, press releases regarding the state’s school improvement efforts and other pertinent information.
persistently lowest-achieving schools. The Obama administration expanded the program by providing over $7 billion in funding between 2010 and 2015. Individual schools could receive up to $2 million per year for three years.\(^5\) Funding, however, was predicated on the condition that the school adopt one of four models of intervention:

- **Turnaround model**: Replace the principal and at least 50 percent of the staff.
- **Restart model**: Close the school and reopen as a charter school.
- **School closure**: Close the school and enroll the students in other higher achieving schools within that district.
- **Transformation model**: Implement each of the following strategies: (1) replace the principal and take steps to increase teacher and school leader effectiveness; (2) institute comprehensive instructional reforms; (3) increase learning time and create community-oriented schools; and (4) provide operational flexibility and sustained support.\(^6\)

When presented with the choice, the vast majority of schools chose the turnaround model, believed to be the least disruptive intervention.\(^7\) In January 2017, the U.S. Department of Education released their evaluation of the Obama era SIG program which revealed that overall the program had no significant impact on student achievement.\(^8\)

“\textbf{We want to start with thanking you for doing this work—it’s the right work to push states to think more critically about systems they have set up and to continue to improve. It’s the only way we will help ensure that all of our children have access to the high-quality education they deserve.}”

—State Chief

Under ESSA, districts no longer have to subscribe to an intervention model as determined by the federal government. They are instead charged with developing a strategy that best meets their needs. Decades of research demonstrates that turning around low performing schools requires bold leadership at the district and school levels to make significant changes to both school culture and instructional practices. Given the lessons learned from the SIG program, it is fair to ask: how can we be sure that districts will not continue to take the path of least resistance when provided with more flexibility under the law?
1. Coherent and Aligned Vision for Improving Outcomes

The degree of clarity and coherence state leaders demonstrate when communicating a compelling vision for improving outcomes can play a significant factor in the ultimate success of school improvement. State leaders should communicate both a sense of urgency and a comprehensive plan for addressing the academic needs of students in low performing schools.

Peer Review Findings

- While nearly every state reviewed referenced equity in some way, FEWER THAN HALF clearly stated equity as a focus and required districts to demonstrate how they would address inequities – such as providing more access to high quality teachers, rigorous curriculum and enrichment opportunities.

- TEN STATES consistently articulated a coherent, compelling vision or theory of action to drive their school improvement efforts. State leaders can leverage their bully pulpit to advocate for policies that facilitate turnaround — including funding, time and staff — in the effort to create the demand for change.9 The states that were rated “strong” or “exemplary” in our review are: Colorado, Georgia, Indiana, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York and Tennessee.

- TEN STATES indicated that they are re-organizing their agency to support the coordination of monitoring and oversight efforts. The internal structure of the state agency can play a pivotal role in improving outcomes. For example, creating an internal team comprised of the school improvement, accountability, curriculum and special population staff may help streamline the allocation of resources and support systems and facilitate the communication of a clear and unified message to districts. The ten states are: Arizona, Colorado, Connecticut, Georgia, Idaho, Illinois, Massachusetts, Nevada, New Mexico and New York.

- FOUR STATES, Colorado, Indiana, Florida and Tennessee, have competing systems to identify schools. Having dual state and federal accountability systems, where the state has one
system to identify a school for intervention and another to meet federal law, undermines the ability to drive change and improve outcomes. Discrepancies between the two accountability systems could result in confusion and negate the impact of the school improvement efforts. If a school is identified for support under one system, but not the other, how are school and district leaders expected to trust the results and prioritize their efforts or make significant change?

Peer Recommendations

- **Get clear on desired student outcomes and the state's strategy to achieve them.** Whether and how well a state communicates a coherent, compelling message and path forward plays a determining role in the ultimate success of its strategy.

  » **Louisiana** has committed to and clearly articulated a statewide improvement strategy, integrating all their efforts around a vision that every student has access to grade level instruction daily, using a rigorous and high-quality curriculum every teacher has been trained to use.

- **Align internal resources and staff around the central vision.** States should consider creating cross-divisional teams with differentiated expertise to oversee and monitor the progress of the schools.¹⁰ This differentiated approach can help streamline funding, data and resources provided to districts.

2. **Strategic Use of Funding and Alignment of Resources**

Under ESSA, states must set aside 7 percent of their Title I funding for districts and schools to use to develop a locally tailored strategy to intervene in the lowest performing schools. Nationwide, this equates to over $1 billion a year in funding. States are responsible for setting the parameters through which districts receive their funding and the strategies to be employed. The parameters can include:

- The type of grant a district or school can apply for, such as a planning grant or funding the implementation of the turnaround strategy, and the funding allocations;

- The extent to which data from the state accountability system and needs assessment factors into the intervention strategies chosen by the district or school;

- Equity based concerns, such as access to high-quality teachers and rigor of school curricula; and

- The prioritization of eligibility to receive funds – such as funding districts with a higher number of identified schools, districts who have the greatest need and districts who demonstrate the greatest readiness to implement reforms.

Peer Review Findings

- **Districts in EIGHT STATES aren't explicitly required to prioritize efforts that arose from their needs assessment.** States can impose specific conditions on an improvement application to ensure funds are spent in a strategic manner that is aligned with the state's vision for improving outcomes. These states are: Arizona, Connecticut, Florida, Georgia, Illinois, Massachusetts, New York and North Dakota.

- **Only SIX STATES award funding based upon the quality of the submitted application.** The remaining 11 states appear to award funding based on the extent to which a district submitted a plan that meet all the elements. This was
found even in states who are awarding funds competitively. The six states are: Colorado, Connecticut, Louisiana, Nevada, New Mexico and Tennessee.

- **THIRTEEN STATES** are allocating some, or all, of their school improvement funding through **competitive allocation.** This is a significant departure from the methods that states used to allocate funding prior to ESSA. The thirteen states are: Arizona, Colorado, Connecticut, Indiana, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Dakota, Tennessee and Texas.

- **States allocating funding through formula did not prioritize a set of interventions.** In fact, there was no one specific strategy emphasized across all the states reviewed. States that allocated funding competitively tend to differentiate the amount of funds based upon need or a specific, state prioritized strategy.

**Peer Recommendations**

- **Consolidate federal and state funding to leverage change:** States can combine Title II and Title IV dollars with Title I funding to better align their strategic interventions with their state theory of action. States and districts can use the funding to address academic, social and emotional needs as well as educator workforce issues.

  » **Georgia** offers the Consolidation of Funds Initiative for certain districts to be able to consolidate federal, state and local funds

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**States can allocate the 7 percent through a competitive process, through formula or by a blended approach of both strategies. There are trade-offs to each approach that must be considered carefully within the local political context.**

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| **Competitive**| • Allows state to drive resources strategically based on state priorities, including to places with greatest need and the capacity to do the work well.  
• Targets more resources to fewer districts to enable sufficient funds to carry out improvement activities. | • Politically challenging to implement.  
• Can disadvantage districts that lack capacity to create a strong application.  
• Not every district may receive funding to carry out their implementation strategy.  
• State must still support districts that do not receive funding. |
| **Formula**    | • Ensures a maximum number of eligible districts receive funding in an objective way. | • Funding amounts might be insufficient for certain districts.  
• Districts feel less pressure to develop high-quality or innovative improvement strategies if they know they will automatically receive funds. |
| **Blended**    | • Allows states to allocate some funding towards a more robust state improvement strategy while still providing funds to a large number of districts. | • Not every district may receive funding to carry out their implementation strategy.  
• State must still support districts that do not receive funding. |
into Title I schools in order to be able to use those funds more flexibly.

- **Create a funding model that distributes resources to districts based upon their needs assessment and quality of school improvement funding application.** Not all school improvement needs are created equal. States need to put in place a process through which districts first indicate the type of support needed, and states then allocate resources accordingly. When districts can’t ascertain needs on their own, the state should provide guidance and assistance to help districts get clear on the support needed. Rather than providing funding to an unprepared school, or worse, fail to provide funding at all, states should partner with struggling districts to build their capacity prior to awarding implementation funding.

  » **Colorado** developed a streamlined application to award services and funding. The application is organized into four pathways: exploration supports, district designed and led, offered supports and continuation. Each pathway has different criteria and methods of awarding funds. The ultimate intent is to develop a robust process of matching schools’ needs with rigorous, evidence-based strategies and adequate resources.

- **Use funding to address systemic inequities within the system.** Targeting resources that address inequities beyond academics can be a powerful tool.

  » **New York** uses Title I funding to create a socioeconomic integration pilot program whereby districts with a poverty rate of at least 60% and at least 10 schools can apply for funding to better integrate the school systems in an effort to boost achievement while also desegregating their schools.

- **Require districts to demonstrate their capacity to support any of the options selected as a part of the implementation strategy.** It is critical for districts to understand their own strengths and capacity to support schools through the improvement process in order for the improvement efforts to be sustainable.

  » **Indiana** has created separate school improvement grant applications for planning and implementation. Before districts are awarded planning grants, they must demonstrate readiness through the application. If districts do not demonstrate readiness for the application they submit, the state is ready with supports to ensure that all districts and schools are prepared to engage in the appropriate stage of school improvement.

### 3. Rigorous Review Process

States serve as the gatekeeper for districts to receive turnaround funds. As a result, the way a state both designs and evaluates the application for school improvement funding influences its districts’ improvement strategies and allocation of resources including time, funding and personnel. Consequently, giving states the opportunity to help districts craft strong intervention plans helps incentivize dramatic change.

**Peer Review Findings**

- **TWELVE STATES** direct district leaders to perform subgroup data analysis, but only **TWO STATES**, Georgia and Nevada, require districts to lay out a plan for addressing achievement gaps or supplemental supports for subgroup populations.
Requiring districts to demonstrate how their proposed strategy will address the achievement gap and subgroup needs is fundamental to improving outcomes. In addition, states should ensure districts are effectively using data from the accountability system, needs assessment and other state or district audits to justify the chosen intervention strategies and look for quality rather than completeness. The 12 states are: Colorado, Connecticut, Georgia, Illinois, Indiana, Louisiana, Massachusetts, Nevada, New Mexico, New York, Tennessee and Texas.

- **TWO STATES, Louisiana and New Mexico, have notable consequences if districts do not submit quality plans.** These states rejected some district applications due to quality of the proposed strategy, prompting district leaders to revise and resubmit their application.

- **FIVE STATES, Colorado, Louisiana, Massachusetts, Nevada and New Mexico, weight specific components of the district application to prioritize key areas of improvement and require districts to demonstrate alignment between needs, activities and budget.**

- **TWO STATES, Idaho and Minnesota, are not utilizing a rubric to evaluate school improvement applications.** These states are instead prioritizing their partnerships with districts and external partners to ensure the district is developing a comprehensive plan.

**Peer Recommendations**

- **Require districts to demonstrate how their school improvement strategies will address the achievement gap and subgroup needs.** Intervention strategies should be tailored to the needs of the school and the students served. This should be reinforced by having districts demonstrate in their application for funding their plan to address the achievement gap and subgroup needs.

  » **Nevada** explicitly asks that districts include in their application narrative a description of how their chosen strategy or strategies for low performing schools address equity gaps. The state also asks districts to use equity-oriented data such as behavior, attendance and personnel to determine root causes in their needs assessment.

  » **New Mexico** holds one hour “will and capacity” interviews with district or school leaders interested in pursuing their Principles Pursuing Excellence program, one of their intervention models. During this interview, leaders must demonstrate their commitment to closing the achievement gap and their belief that all students can achieve high expectations.

4. **Continuous Improvement, Monitoring and Evaluation**

The ability for states to monitor and utilize data at all levels of their educational systems — at individual schools, by district and statewide — is one of the foundational elements required for deliberate improvement.12 States cannot expect districts to improve unless there is continuous focus on the implementation strategy fueled by clear milestones and feedback loops. Data-driven analyses should pull from the accountability system, formative and student diagnostics, course completion, attendance rates for students and teachers as well as the educator evaluation system. All of this data can be used to create a holistic picture of where to target interventions and monitor the progress towards improvement.
Peer Findings

- **TWELVE STATES** require districts to regularly check in with a state, or external agency, to discuss their progress. These states are: Idaho, Indiana, Georgia, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Dakota, Tennessee and Texas.

- Peer reviewers determined that five states’ school improvement portfolios remain largely compliance-based. Yet states report being focused on continuous improvement and developing a more collaborative relationship with districts. It is important to build trust and partnerships between states, districts and schools, with a freer exchange of feedback that can improve supports. This is harder to do with a compliance-based mindset. These states are: Arizona, Florida, Georgia, North Dakota and Texas.

- States provided more detail on what they expect districts to do in monitoring than what is expected of the state agency itself. Throughout all monitoring, state leaders should continuously examine the evidence to understand the most effective interventions, and should communicate those findings with all those engaged in the work from the onset.

- **SIX STATES** have an established dedicated field, or outreach team, that serves as the liaison between the state agency and identified schools. It is important for states to have a dedicated team working with school officials to not only monitor implementation efforts but also evaluate the efforts writ large. These states are Connecticut, Idaho, Louisiana, Massachusetts, New Mexico and North Dakota.

- Details on the monitoring process were often lacking and it was unclear in most states whether they were implementing the processes set forth in their ESSA plans.

Peer Recommendations

- Work with districts to establish a continuous monitoring cycle. Establishing key milestones and timelines, such as a 30-60-90-day cycle, for leaders to review data and make decisions about the progress is essential to a continuous improvement model. Establishing a regular check in at the school level – weekly or monthly – is a critical component as well.

  » **New Mexico** requires districts and schools to use NM-DASH (Data, Accountability, Sustainability and High Achievement), a web-based action-planning, process management tool to help them develop school improvement plans and identify evidence-based interventions. This system aligns the states accountability and educator evaluation systems with the school improvement efforts. Districts and schools are required check in with officials continuously and use data from NM-DASH to gauge the effectiveness of the improvement strategies.

  » **Idaho** establishes monthly meetings with districts and their assigned capacity builder where district and school leaders meet with representatives from a cross-team at the state to discuss progress, challenges and next steps. The state uses the information from these meetings to target supports or programs based on identified needs.
• Establish an outreach team to monitor school and district performance.

  » **Louisiana** formed a network of field teams whose primary function is to serve as the liaison between the Louisiana Department of Education and the schools. This network has two primary goals, to ensure that 100 percent of teachers are implementing a high-quality curriculum and that 100 percent of principals are using curriculum implementation observation tools to give feedback to all teachers. The field teams visit every classroom in every identified school at least four times a year. Louisiana also overhauled the monitoring and observation tool to align with the new priorities.

 5. **Evidence Based Interventions**

ESSA’s requirement that interventions be supported by strong, moderate or promising evidence may have a strong impact on student outcomes—if districts and schools know how to identify and implement those interventions.

**Peer Review Findings**

• **NINE STATES** provide guidance to districts to ensure they’re choosing the right strategy based upon their needs. Otherwise, states primarily take a compliance approach by listing the **ESSA statutory requirements** around evidence-based practices and asking districts to provide a justification for how their proposed strategy aligns. States should guide districts in selecting interventions that meet ESSA’s evidentiary standards while also providing the best match to the local context and needs. Capacity-building in this area can include: creating a list of approved interventions from which districts can select; offering vetted resources for district leaders to consider; or offering customized support. These states are: Colorado, Connecticut, Georgia, Indiana, Louisiana, Massachusetts, Nevada, New York and Tennessee.

• **Only SIX STATES** explicitly ask districts to submit the results of the needs assessment and demonstrate how the intervention addresses these needs. A fundamental component of choosing the right intervention is having a robust and comprehensive needs assessment that address the primary contributors to student learning at the school – the quality of the curriculum and instruction. Some researchers note that without this rigorous and granular level of data, it is nearly impossible to effectively and accurately diagnose a root cause for the low performance, let alone develop an effective intervention strategy. These states are: Connecticut, Georgia, Idaho, Louisiana, New York and Tennessee.

• **Only FOUR STATES**, Georgia, Louisiana, New Mexico and Tennessee, ask districts to examine the inequitable distribution of resources, such as teachers and access to a rigorous curriculum,
and develop an intervention strategy that will combat these issues.

**Peer Recommendations**

- **Have a rigorous and sophisticated needs assessment** that walks districts and schools through a process to identify root causes of underperformance and links to practical strategies. Our peers recognize that without a proper needs assessment tool that can effectively capture the quality of the teaching and the rigor of the curriculum, the effectiveness of the strategy is obsolete.

  - **Tennessee** employs a comprehensive approach to supporting schools. The school improvement application serves as a step-by-step primer for districts in how to do a detailed needs assessment, identify common themes, do a root cause analysis to identify then prioritize the areas of greatest need, and then develop goals and an implementation plan to address each high-priority area.

  - **Arizona** employs a rigorous and comprehensive needs assessment. The state’s guidance contains a thorough set of equity-oriented questions in the root cause analysis, such as those related to discipline, truancy and educator bias. It also provides district and school staff with decision-making tools and exercises.

- **Provide districts with evidence-based practice guides and resources.** While ESSA requires that

Dr. David Steiner, former Commissioner of Education in New York and Executive Director of the Institute for Education Policy at Johns Hopkins University, writes that there are three elements fundamental to transforming outcomes in schools: the teacher, principal and the curriculum. Together these three elements comprise what he refers to as “the instructional core.” Students in income-restricted neighborhoods are less likely to have access to effective teachers, engage with rigorous and successful curricula and participate in other enrichment opportunities. Yet, a consistent finding in the school improvement research is the importance of quality instruction and school leadership.

A recent study by the Foundation for Excellence in Education noted that one in four schools serving high populations of minority students do not offer Algebra I or higher and nearly one in three don’t offer Biology or higher. Gaining access to these courses – which are generally required for college entrance – poses an additional barrier for low-income students or students of color, who often attend schools that lack the resources to support this coursework.

An effective school improvement strategy cannot overlook the importance of the material we teach, how effectively we teach it and which students have access to quality instruction.
Evidence-based interventions are used in school improvement, states can go above the letter of the law and do more to enable their districts and schools to tie interventions to the outcomes of their needs assessments.

» Connecticut has created an evidence-based guide that could be a model for other states. The guide is well-organized, listing each practice, a rationale for its use, the applicable grade band and a citation to its original source.

• Connect the state’s school improvement efforts and educator equity plan. States were required to develop equity plans to address the pervasive issue of low income and minority students being disproportionately taught by inexperienced and ineffective teachers. Given the connection between student performance and the effectiveness of the teacher, alignment between state school improvement and equity plans is critical to ensure every student is taught by a highly effective teacher.

» In both Illinois and Georgia, districts must complete an equity analysis prior to receiving school improvement funding. This includes districts examining the extent to which students are being taught by out of field or uncertified teachers.

6. Capacity Building and Autonomy

The quality of discourse between a state and its local districts is a huge factor in whether or not the state can effectively manage underperformance. States must set clear and consistent expectations and local leaders must feel respected in order for this balance to set. And while nearly everyone involved with the difficult work of school improvement seeks as much autonomy as possible, school improvement can’t be achieved when leaders at various levels rely on excuses instead of action or when mistrust permeates the intervention.

“Low-performing schools must do what is required to make rapid improvements, but simultaneously, evidence-based practices must also be shared with the high performers.”

—Peer Reviewer

Peer Review Findings and Research

• Nine states have a tiered system of support or provide direct coaching to districts and schools on their turnaround efforts. States will continue to wrestle with the appropriate balance of flexibility and autonomy to offer districts, but must ensure that leaders at all levels remain accountable for the success of all students. One way is to create transparent tiers of intervention that include well-defined supports, consequences and criteria for action that support all schools, with the most significant energy geared towards identified schools. These nine states are: Colorado, Georgia, Idaho, Illinois, Indiana, Massachusetts, New Mexico, New York and North Dakota.

• Ten states did not display evidence of having a framework to support and monitor outside entities that partner with district’s and schools in school improvement. These states are: Arizona, Colorado, Florida, Georgia, Idaho, Minnesota, Nevada, New Mexico, New York and Tennessee.
Peer Recommendations

- **Vet external partners.** Districts often rely on external partners to help them develop and implement their intervention plans and address capacity issues. Therefore, states should carefully support and monitor partner engagements and develop quality control mechanisms. This could include:
  - Creating a template application for district leaders to use when contracting with outside entities.
  - Creating a vetted list of approved vendors who are familiar with the state's process and turnaround vision.
  - Hosting vendor fairs or summits where approved contractors and district leaders convene together to receive training on the school improvement strategy.
  - The Illinois State Board of Education developed the IL-EMPOWER prototype contract for districts in an effort to provide technical assistance and support for initiating a new contract with an approved professional learning Partner. The prototype contract helps districts choose an approved third-party provider who will support the district's ability to implement a strategy aligned with the IL-EMPOWER system.
  - Minnesota provides grant opportunities for regional service centers to assist districts and schools in implementing research-based interventions.
  - Indiana, Louisiana and Nevada held annual summits connecting district leaders to approved vendors. These organized events also serve as opportunities for district leaders to connect with one another and exchange insights and recommendations.

- **Develop strategies to address the capacity of leaders in all schools.**
  - In Idaho, each school is assigned a “capacity builder improvement coach” shortly after being identified for comprehensive support. The capacity builders play an active role in supporting the identified schools with their improvement efforts, including supporting the school in developing an approvable school wide improvement plan, attending check in phone calls with the state and helping establish a school-based leadership team to sustain the work.
  - North Dakota uses a multi-tiered system of supports to support their school improvement efforts. Through this model, districts and schools are paired with a coach who works with the identified school to conduct an assessment and develop an improvement plan. The coaches check in with the school leaders three times throughout the year and work with the leaders to evaluate the progress and determine an appropriate path for the following school year. They then report back to the state on progress and also build the capacity of state staff themselves to support school improvement efforts.

7. **Engaging Stakeholders**

ESSA requires districts and schools to engage their stakeholders in developing and implementing school improvement plans. Such engagement can serve as a key element of the most successful school turnaround efforts, with two-way communication fostering necessary trust and buy-in.
improvement work involves more than analyzing hard evidence and data—it is messy, complicated and deeply personal. Andy Smarick cautions that schools are critical elements of their surrounding neighborhoods. All schools have a storied history, serving as community hubs, employers and a source of local pride. As a result, district leaders play a pivotal role in the success and sustainability of the improvement strategy.

**Peer Review Findings**

- **TEXAS AND IDAHO** are the only states in our review that provide training to district leaders on school improvement interventions. Superintendents are often the primary liaison to the community, sharing the changes that must be made in order to support the school and the community. School board members are the ones that adopt the budget and are responsible for allocating funding and staff; thus, they too play a significant role in the success of improvement. Many school board members are elected officials and also regularly communicate to the public their vision for change and improvement. It is important for these officials to understand the root causes of the issues and how the proposed intervention strategy will support the desired change so that they can effectively communicate this strategy to the public.

- The vast majority of states, **FOURTEEN**, require districts to provide a description of how stakeholders were engaged in the development of the improvement plan. However, in Florida, Illinois and North Dakota, it is unclear, the extent to which districts are expected to engage their stakeholders in the development of the plan – a requirement under ESSA. The fourteen states are: Arizona, Colorado, Connecticut, Georgia, Idaho, Indiana, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, Tennessee and Texas.

- **FIVE STATES** require, or encourage, districts to form a stakeholder engagement team to support the development and implementation of the improvement plan. Prioritizing engagement as an element in the school improvement rubric and application can be one effective way to ensure districts engage their community members, which can help leverage buy-in and sustain outcomes. These states are: Connecticut, Colorado, Idaho, Indiana and Minnesota.

- **SIX STATES** provide guidance and information about how to engage with stakeholders or about the school improvement process. These states are: Colorado, Connecticut, Georgia, Idaho, Indiana and Tennessee.

**Peer Recommendations**

- Encourage and facilitate engagement with stakeholders at every opportunity. For school improvement plans to take root and succeed, they must reflect early, regular input and commitment of state officials, local leaders, education advocates, organizations that serve families and children, higher education institutions and others. This can include engaging stakeholders as partners in decision making, providing capacity building around meaningful engagement and connecting districts with vetted, experienced strategic partners with a track record of results.

  - **Louisiana** passed Act 555 which mandates each public school to host a public meeting whereby the school leaders present their action plan. The presentations are required to include school and student performance data, as well as a timeline for the implementation of the plan and timeline of achievement goals.

  - **Indiana** requires each district to form a team that includes, at a minimum, at least
one representative from the following stakeholder groups: school leadership team members, educators, staff and family and community members. The district must describe how the identified school plans to meaningfully engage stakeholders throughout improvement implementation. The school must set at least one S.M.A.R.T. goal for its ongoing stakeholder engagement efforts and at least two short-term benchmarks to monitor progress. For each benchmark, the school is required to define clear measure(s) of success and a target date for completion.

- **Provide training to local leaders.** Some states require districts to provide an explanation of when and how stakeholders were involved in both the development and implementation of proposed activities whereas others require the local leaders to sign the application to verify support.

> **Texas’ Lone Star Governance** program promotes sustainability and capacity by providing local governing teams—school boards in collaboration with their superintendents—with a continuous improvement model focused on improving student outcomes. The program is built around the five key points of Texas’ Framework for School Board Development: vision; accountability; structure; unity; and advocacy.

### 8. Sustaining the Outcomes

To stem the tide of schools cycling in and out of improvement, states must incorporate plans for sustainability from the outset, considering “how to sustain successful school improvement efforts financially, politically, and by ensuring the school and district are prepared to continue making progress.” Developing sustainability, however, can be a challenge given that improvement strategies often hinge on organizing resources like time, effective teachers and leaders as well as funding. Nevertheless, state leaders can emphasize the mindset of sustainability from the outset by:

- Requiring districts to include their plan for sustaining the gains when they submit their applications;
- Working with policymakers to codify accountability and school improvement strategies into state law;
- Working with the district and school leaders to infuse a culture of improvement;
- Partnering with district and school leaders to address teacher recruitment, retention and compensation policies; or
- Developing an evaluation system to examine implementation success and challenges from the state, district and school levels.

“Public schools across the country are desperate to understand the keys to implementing and sustaining successful school turnaround work and need a stronger research base in this area to accelerate improved outcomes for kids.”

—Peer Reviewer
Peer Review Findings

- Only **NINE STATES** require districts to provide their plan for sustaining the outcomes. Furthermore, the quality of sustainability efforts varied greatly amongst Connecticut, Indiana, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, Tennessee and Texas.

- **NO STATES** articulated a clear plan for supporting schools after they exit improvement status to help ensure they maintain gains—a clear challenge to sustainability.

- In **SEVEN STATES**, it was unclear, or not included, their plan for evaluating the impact of statewide efforts—including the state’s own frameworks, processes and procedures—and having a process to support districts’ and schools’ capacity to maintain improvement. These states are: Arizona, Colorado, Florida, Georgia, Illinois, New York and North Dakota.

Peer Recommendations

- Encourage districts to think about the sustainability of their improvement efforts from the beginning. Helping identified schools exit out of improvement is incredibly difficult and often dependent on many factors including leadership, funding and political will. States can use many strategies to support these efforts, including: incorporating sustainability in their district application and scoring rubric; planning annual evaluation of approaches statewide; and formally studying their improvement efforts.

  » **Massachusetts** provides districts and school leaders a sustainability toolkit with tools, frameworks and resources to help them plan for sustainability once school redesign grants and other temporary funds are exhausted.
Conclusion

The Every Student Succeeds Act reoriented the responsibility for identifying and intervening in our chronically underperforming schools from the federal government to states and districts. With a limited federal role, we must now look individually at all 50 states to understand how our nation is addressing the achievement gap. We saw three approaches emerge from our analysis. No doubt, all three approaches have strengths, weaknesses and the ability to succeed. The key is to be explicit about the philosophy and then to follow through with a coherent, measurable plan that is known by all of the stakeholders.

The State Leadership Approach —

Chiefs in these states have outlined an explicit and coherent vision for school improvement, and for the most part have integrated it throughout all their efforts. They’ve strived for consistent messaging around school improvement, developed a system to monitor the progress, and they’ve used competitive funding to prioritize resources to districts that have demonstrated a commitment to real improvement. The state is leading from the front and communicating a need for urgent change. Peers paid special attention to the degree to which these states’ theories of action were front-and-center throughout all of their school improvement materials and articulated an equity focus. These states are Louisiana, Massachusetts, New Mexico and Tennessee and on average they scored the highest in our review.

The Partnership Approach —

These states view themselves as partners with districts, and try to walk the line in acting as both a coach and a referee. They focus on enhancing district capacity throughout the improvement process to make decisions and serve all students. Rubrics
are often used to guide conversations around the improvement process rather than grade the quality of the applications and state staff generally work with districts to complete the plan if it lacks initially. Many of these states are establishing progress monitoring check-ins with districts, where the conversation is geared around “how can we help.” Peers looked particularly at whether these states clearly defined roles and responsibilities for school improvement at the state, district and school levels. There are five states in this category: Connecticut, Idaho, Minnesota, Nevada and North Dakota.

**The District Leadership Approach —**

These states view their role as creating a foundation for improvement and expect district leaders to take primary responsibility for developing and implementing their school improvement strategy. As a result, these states often employ very specific school improvement frameworks, planning tools, or funding guidance. These states lean heavily on a local needs assessment or school improvement application to make funding determinations, and will generally point districts to evidenceforessa.org or a state-created resource hub for intervention recommendations, but will not prioritize a specific strategy. Peers paid special attention to the degree to which these states had completed a high-quality suite of school improvement guidance and foundation documents and made it publicly available. There are eight states in this category: Arizona, Colorado, Florida, Georgia, Illinois, Indiana, New York and Texas.

It is evident that districts are tasked with the primary responsibility to carry out reforms and turn around our schools. The level of supports provided to these leaders, however, is mixed as only four states received a strong or higher rating in half of the categories. Furthermore, many states have not completed their guidance for district and school leaders to carry out their interventions. As a result, districts may not be getting the information they need even though states are identifying low performing schools for improvement during this school year.

**Conclusion**

For some, this report will confirm their fears that the wide latitude under the new law will lead to the path of least resistance. There is no doubt that in some states that is true. However, our hope is that this review is a useful tool to state education leaders, educators, stakeholders and advocates as they grapple with the right leadership models, policies and interventions to dramatically improve their lowest performing schools. In a noisy political environment that changes daily, this is one equity gap that if given the prioritization, rigor, energy and resources it deserves, could be closed.
HCM Strategists, LLC (HCM) is a public policy and advocacy firm committed to working toward equitable and meaningful change in both education and health care. Our K-12 Practice is dedicated to improving student achievement for all students, but especially those low income and minority students who are being underserved by the public education system. We appreciate the opportunity to partner with the Collaborative for Student Success whose bold and sustained vision made this work possible.

Many individuals lent their talents to support the peer review process and the development of the report. The process was strengthened by the contributions and collaborations of Adam Ezring and Ashley Inman at the Collaborative for Student Success; D’Arcy Philps, Lindsay Fryer and Andrew Ferson of the Penn Hill Group; Michelle Austin, Jacquie Lawing Ebert and Victoria Fosdal at GMMB; and Erin Hughes and Chris Myers at DCI Group. We offer thanks to Melody Schopp, Terry Holliday, June Atkinson, Carlas McCauley, Scott Sargrad, Joanne Weiss and Gavin Payne for critiquing the rubric used in the peer review process. Understanding states current activities for school improvement was not possible without the support of William Porter, Anand Vaishnav and Angeline Willen with Education First.

**HCM Team members working on the project included:**

- Liz Ross, Project Lead
- Cindi Williams
- Duncan Robb
- Jocelyn Pickford
- Kelly Scott Hoffman
- Shanteal Lake
- Jessica Lawrence
- Rachel Taylor
- Spencer Philips
- Terrell Halaska
Appendix A: Rubric

Guidelines for Peers

The 2018-2019 school year marks the deadline that states must identify schools for comprehensive and targeted support, yet many states continue to wrestle with how to leverage their flexibility and implement best practices within their schools and districts. Building on the knowledge gained in Check State Plans, the Collaborative for Student Success, in partnership with HCM Strategists, is embarking on a new phase of work called Promise to Practice. The purpose of this endeavor is to ascertain:

1. Whether states are utilizing their autonomy to implement new, rigorous and innovative approaches to intervene in low-performing schools;

2. Trends and best practices in how states are approaching school improvement; and

3. The progress states have made implementing ESSA’s school improvement provisions.

We are looking for states to take an evidence-based approach as required under the law but go further with rigorous criteria and processes to ensure that school improvement funds will support the most effective strategies. We are also looking for a coherent state vision that informs and aligns its strategies, with high expectations matched by supports and guidance to grow districts’ and schools’ capacity.

Please use the following criteria to evaluate the state’s portfolio of information regarding their approach for school improvement.

Exemplary — The state has a clear and ambitious strategy to leverage change focused on closing the achievement gap and improving outcomes. The state is providing comprehensive support to LEAs and building their capacity for improvement efforts. This is a model for other states.

Strong — The state is utilizing their flexibility and autonomy to leverage change. The state is providing robust support to LEAs in their turnaround efforts.

Adequate — The state meets the minimum requirements of the law. The state is providing some support to districts in their turnaround efforts. However, the state’s approach is likely to maintain the status quo.

Needs Improvement — The state has little evidence that meets the rubric criteria. The state is providing minimal support to LEAs in their turnaround efforts.

Weak — The state’s portfolio lacks evidence that meets the rubric criteria. The state is not leveraging their flexibility or autonomy to close achievement gaps and improve outcomes. The state may not be complying and this practice should not be emulated by others.
N/A — The state does not have enough publicly available information to sufficiently evaluate the question.

**Turnaround Components**

*For each of the following components, please rate the state’s portfolio using the scale provided and include your rationale.*

1. **Coherent and Aligned Vision for Improving Outcomes**: How well does the state articulate a coherent vision or theory of action that drives their school improvement efforts? Is this vision aligned with the state’s accountability system and goals for closing the achievement gap?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

2. **Strategic Use of Funding and Alignment of Resources**: Is the state allocating funding in a way that is strategic and maximizes resources? Are LEAs expected to prioritize improvement efforts that address the underlying performance issues?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

3. **Rigorous Review Process**: Is the state applying rigorous criteria and review processes to ensure resources will be used to support effective school improvement efforts? Is the state prioritizing funding to LEAs who demonstrate the greatest need for school improvement funding (including LEAs with a high percentage of CSI and TSI schools) and the strongest commitment to school improvement?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

4. **Continuous Improvement, Monitoring and Evaluation**: Does the state have a robust, data-driven process to monitor LEAs’ implementation of the school improvement plans within their district? Did the state establish clear milestones to ensure improvement over time, and within four years?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

5. **Evidence-Based Interventions**: To what extent is the state mandating LEAs use evidence-based strategies in their improvement efforts? Does the state provide guidance and supports to LEAs to help them identify and implement the most effective strategies based upon their needs?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

6. **Capacity Building and Autonomy**: How well does the state articulate, delineate or set parameters around which interventions and responsibilities belong to the state, LEA and/ or school? Does the state provide support or guidance to help LEAs identify and reduce barriers to school improvement? Does the state have a framework or process to support and monitor outside entities who partner with the state, LEAs or schools in school improvement efforts?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary

7. **Engagement**: Does the state require LEAs to engage with stakeholders such as parents and community members in the development and implementation of their school improvement plans? Does the state provide sufficient guidance and resources to LEAs to effectively do so, helping them foster local buy-in and promote sustainability?
   - N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary
8. **Sustainability**: Does the state have a plan in place to review the school improvement efforts statewide and evaluate the impact and effectiveness? Does the state have a process in place to support LEAs and schools by enhancing their capacity to maintain their improvement efforts upon exiting identification and intervention?

| N/A | Weak | Needs Improvement | Adequate | Strong | Exemplary |

**Overall Approach**

*In your responses, please incorporate any contextual information provided that you consider relevant to assessing a state's overall approach. For example, a pending legislative effort, court challenge or other factor might impact the state's ability to develop and execute a strong school improvement strategy.*

1. **Equity**: How well does the state's approach to school improvement include focused attention on supporting underserved students and closing the achievement gap? Does the state require LEAs to maintain an equity focus in their school improvement plans, activities and resource allocations?

2. **Strengths**: How is the state thoughtfully leveraging ESSA's flexibility to put in place the necessary policies and procedures that create an enabling environment for effective and sustained school improvement, and that consider state/local lessons learned from past efforts? What parts of the state's turnaround strategy or guidance to LEAs were strongest or exemplary?

3. **Improvements**: How can the state improve its turnaround efforts? What parts of the state's strategy or guidance to LEAs were unclear? What risks and challenges might the state face with its current approach?
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<tr>
<th>Peer Name</th>
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<tr>
<td>Caitlin Scott</td>
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<td>Carlas McCauley</td>
<td>Center for School Turnaround, WestEd</td>
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<td>Conor Williams</td>
<td>The Century Foundation</td>
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<td>Dale Chu</td>
<td>Former Chief of Staff, Indiana Department of Education</td>
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<td>Donna Johnson</td>
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<td>Garrett Landry</td>
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<td>Gavin Payne</td>
<td>Former Chief Deputy Superintendent of Public Instruction, California</td>
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<td>Kerri Briggs</td>
<td>Former Assistant Secretary, Elementary and Secondary Education, U.S. Department of Education</td>
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<td>Ginny Gentles</td>
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<td>Julie Corbett</td>
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<td>Karla Estrada</td>
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<td>Tony Bennett</td>
<td>Former Superintendent of Public Instruction, Indiana</td>
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<td>Whitney Chapa</td>
<td>Arizona State Board for Charter Schools</td>
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Appendix C: ESSA School Improvement Requirements

School Improvement Funding

- States must reserve 7 percent of their Title I funding for school improvement.
- States must allocate at least 95 percent of those funds to school districts, by either a formula or competitive basis, to Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools.
- States must use non-allocated funds to establish funding distribution methods, monitor and evaluate the use of funds, and, as appropriate, reduce barriers and provide operational flexibility for schools undergoing school improvement activities.
- The State cannot award each subgrant for longer than 4 years, which may include a planning year.
- A school district must submit an application to the State to receive this funding.
- All applications must include a description of how the school district will support CSI and TSI schools, monitor the use of funds for TSI schools, review and select any external partners, align other Federal, State and local resources to carry out school improvement activities, and, as appropriate, modify practices and policies to provide operational flexibility that enables such activities.
- School districts must guarantee that each CSI and TSI school within the district will receive all of the State and local funds it would have received in the absence of Federal funding.
- The State must prioritize funding to school districts that have a high number or percentage of CSI and TSI schools, demonstrate the greatest need for such funds (as defined by the State) and demonstrate the strongest commitment to school improvement.
- The State must provide a list of all school districts receiving funds, the amount those districts received and their school improvement strategies.

Identification of CSI Schools:

States set criteria to identify, every 3 years, schools for comprehensive support and improvement, which must include at least:
- The bottom 5% of the lowest –performing Title I schools
- High schools with graduation rates less than 67%

Identification of TSI Schools:

States set criteria to identify, every year, schools for targeted support and improvement, which must include:
- Schools that are “consistently underperforming” for subgroups of students, as defined by the State.
School Improvement for CSI Schools:

- School districts come up with an improvement plan, that is approved by the school, district and State, to intervene in these schools.
- Improvement plans must include some form of stakeholder engagement.
- Improvement plans must be informed by student performance on all State accountability indicators including against State-determined long-term goals.
- Improvement plans must include evidence-based interventions, be based off a school-level needs assessment and identify resource inequities.
- The State is required periodically monitor and review school improvement efforts.
- If the school does not improve in a State-determined number of years (no more than four years), the State must take further action.

School Improvement for TSI Schools:

- The school comes up with an improvement plan, that is approved by the school district, to intervene in the schools.
- Improvement plans must include some form of stakeholder engagement.
- Improvement plans must be informed by student performance on all State accountability indicators including against State-determined long-term goals.
- Improvement plans must include evidence-based interventions.
- The school district must monitor school improvement efforts.
- If the school does not improve in a school district-determined number of years, the school district must take further action.

School Improvement for Additional Targeted Support (ATSI) Schools:

- If a school has a subgroup of students that, by itself, would meet the criteria to be identified for CSI status, the school will be identified for additional targeted support.
- In addition to fulfilling the requirements for TSI schools, ATSI schools must identify resource inequities.
- If the school does not improve in a State-determined number of years, the State must assign that school CSI status.

Additional State Requirements:

- The State is required to establish statewide exit criteria for CSI and ATSI schools to meet within the respective State-determined number of years (as previously mentioned).
- The State is required to periodically review resource allocation to support school improvement for school districts that serve a significant number of CSI and TSI schools.
- The State is required to provide technical assistance to school districts that have a significant number of CSI or TSI schools.
Endnotes


HCM Strategists, LLC (HCM) is a public policy and advocacy firm committed to working toward equitable and meaningful change in both education and health care. Our K-12 Practice is dedicated to improving student achievement for all students, but especially those low income and minority students who are being underserved by the public education system. We appreciate the opportunity to partner with the Collaborative for Student Success whose bold and sustained vision made this work possible.