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# **MEMORANDUM**

**DATE:** April 15, 2020

**TO:** MEMBERS, State Board of Education

**FROM:** TONY THURMOND, State Superintendent of Public Instruction

**SUBJECT:** Update on the Implementation of the Integrated Local, State, and Federal Accountability System: Schools Eligible for Support Under the Every Student Succeeds Act.

The California Department of Education (CDE) recently reviewed the business rules associated with the exit criteria used to determine eligibility for Comprehensive Support and Improvement (CSI) for schools. Based on this review, the CDE found that 40 schools are no longer eligible for CSI based on revised business rules. All changes are reflected in this updated memorandum.

## Summary of Key Issues

On an annual basis, states are required under the Every Student Succeeds Act (ESSA) to determine which schools were eligible for Comprehensive Support and Improvement (CSI) based on the criteria in their State Plan. Such determinations typically must occur at least once every three years. However, in a letter dated November 8, 2019, approving the amendments to the 2018 ESSA State Plan, the U.S. Department of Education (ED) required California to determine school eligibility for CSI again in 2019–2020, to allow for the inclusion of the English Learner Progress Indicator (ELPI) in the criteria (<https://www.cde.ca.gov/be/pn/im/documents/dec19memogad01.docx>).

Determinations of school eligibility for CSI must include at least the lowest performing 5 percent of all schools receiving Title I funds. It is important to note that Title I funding status for schools in the CSI – Lowest Performing schools category is determined by Title I allocations received in a school’s initial eligibility year. If a school subsequently discontinues receipt of Title I funds after its initial eligibility year, it remains eligible for CSI – Lowest Performing unless it meets the exit criteria. This year, three schools in the CSI – Lowest Performing category did not receive Title I funds.

In addition, any public high school whose average graduation rate is below 68 percent for three consecutive years are automatically eligible for CSI – Graduation Rate, regardless of its Title I status. This threshold reflects the adjustment adopted by the State Board of Education (SBE) at the September 2019 meeting (https://www.cde.ca.gov/be/ag/ag/yr19/documents/sep19item01.docx) and the transition to calculating the combined four-and five year graduation rate adopted at the July 2019 SBE meeting (<https://www.cde.ca.gov/be/ag/ag/yr19/documents/jul19item01.docx>). As described in Attachment 1, for the 2019–2020 eligibility cycle, the California Department of Education (CDE) used an average of two years of data for these criteria.

With two years of English language assessments data available in 2019, the CDE also calculated the ELPI Status in order to be incorporated into the criteria for eligibility of differentiated assistance under the Local Control Funding Formula (LCFF) and school level assistance under ESSA. In November 2019, the SBE approved the CDE’s proposed methodology for incorporating ELPI Status into these calculations (<https://www.cde.ca.gov/be/ag/ag/yr19/documents/nov19item04.docx>).

ESSA also requires that states determine which schools are eligible for Targeted Support and Improvement (TSI), based on student group performance. Under California’s ESSA Plan, schools that are not eligible for CSI will be eligible for TSI regardless of their Title I funding status if they have one or more student groups(s) that, for two consecutive years, meet the criteria applied to determine at least the lowest performing 5 percent of Title I schools. As detailed in Attachment 2, the criteria to determine schools eligible for Additional Targeted Support and Improvement (ATSI) are identical to the TSI criteria. Normally, TSI eligibility would be determined annually while ATSI would be determined every three years. However, in order to adhere to the State Plan, in 2018–19 all schools that met the criteria for TSI were moved into the ATSI category.

Similarly, in 2019–2020, all schools meeting the criteria for TSI will be moved to the ATSI category. This will allow California to align ATSI determinations made under ESSA to the local educational agency (LEA) eligibility for assistance determinations made under LCFF.

**A school can only be eligible for one category of assistance. In other words, a school cannot be eligible for CSI and TSI (or ATSI) at the same time**.

In addition, schools in all three categories have the opportunity each year after their initial determination to exit support and improvement by meeting the exit criteria included in the ESSA State Plan. More detailed information about eligibility and exit criteria are listed in Attachment 2 of this document.

Please note that the schools not eligible for CSI or ATSI are eligible for general assistance, as shown in Tables 1 through 4. Information on the selection, eligibility criteria, and eligibility list for CSI and ATSI are available on the CDE School Support web page at <https://www.cde.ca.gov/sp/sw/t1/schoolsupport.asp>.

Table 1 provides a breakdown of schools eligible for the two categories of CSI, ATSI, and general assistance.

**Table 1: Summary Results of Schools Eligible for CSI, ATSI, and General**

**Assistance**

| **Determination Status** | **Total** |
| --- | --- |
| **CSI** – Graduation Rate | 293 |
| **CSI** – Lowest Performing | 483 |
| **ATSI** | 1,043 |
| **General Assistance** | 8,151 |
| **Total Schools** | 9,970 |

Table 2 shows the number of schools eligible for the two categories of CSI, ATSI, and general assistance by charter status.

**Table 2: Summary Results of Schools Eligible for CSI, ATSI, and General**

**Assistance – By Charter Status**

| **Determination Status** | **Number of Non-Charter Schools** | **Number of Charter Schools** |
| --- | --- | --- |
| **CSI** – Graduation Rate | 211 | 82 |
| **CSI** – Lowest Performing | 446 | 37 |
| **ATSI** | 989 | 54 |
| **General Assistance** | 7,059 | 1,092 |

Table 3 shows the number of schools eligible for CSI, ATSI, and general assistance by Dashboard Alternative School Status (DASS) status.

**Table 3: Summary Results of Schools Eligible for CSI, ATSI, and General**

**Assistance – By DASS Status**

| **Determination Status** | **Number of Non-DASS Schools** | **Number of DASS Schools** |
| --- | --- | --- |
| **CSI** – Graduation Rate | 57 | 236 |
| **CSI** – Lowest Performing | 360 | 123 |
| **ATSI** | 1,001 | 42 |
| **General Assistance** | 7,545 | 606 |

Table 4 shows the assistance status of schools between 2018 and 2019.

**Table 4: Assistance Status of Schools Between 2018 and 2019**

| **2018 Assistance** | **2019: CSI –** Graduation Rate | **2019: CSI –** Lowest Performing | **2019: ATSI** | **2019: General Assistance** | **Total** |
| --- | --- | --- | --- | --- | --- |
| **2018: CSI –** Graduation Rate | 220 | 8 | 6 | 59\* | 293 |
| **2018: CSI –** Lowest Performing | 14 | 111 | 120 | 225\* | 470 |
| **2018: ATSI** | 4 | 70 | 344 | 436\* | 854 |
| **2018: General Assistance** | 53 | 290 | 573 | 7,276 | 8,192 |
| **2018:**  **No Status** | 2 | 4 | 0 | 155 | 161 |
| **Total** | 293 | 483 | 1,043 | 8,151 | 9,970 |

\*720 schools exited from the CSI –Graduation Rate, CSI – Lowest Performing, and ATSI categories in 2018 to General Assistance in 2019 as shown in Table 4.

Table 5 shows the number of LEAs eligible for differentiated assistance under the LCFF with the number of schools eligible for CSI and ATSI.

**Table 5: Number of Non-Charter Schools Located in LEAs Eligible for Differentiated Assistance**

| **Assistance Type** | **Number of Schools Eligible for ESSA Assistance** | **Number of Schools in LEAs Eligible for Differentiated Assistance** | **Percent of Schools in LEAs Eligible for Differentiated Assistance** |
| --- | --- | --- | --- |
| **CSI –** Graduation Rate | 211 | 162 | 76% |
| **CSI –** Lowest Performing | 446 | 345 | 77% |
| **ATSI** | 989 | 760 | 76% |

Attachment 1 of this Information Memorandum details the eligibility and exit criteria for CSI and provides data on the schools eligible for CSI. Attachment 2 details the eligibility and exit criteria for ATSI and provides data on the schools eligible for ATSI.

## Attachment(s)

Attachment 1: Comprehensive Support and Improvement Eligibility Determinations   
(3 Pages)

Attachment 2: Additional Targeted Support and Improvement Eligibility Determinations (2 Pages)

# **Attachment 1**

## Comprehensive Support and Improvement Eligibility Determinations

### Eligibility and Exit Criteria

The Every Student Succeeds Act (ESSA) requires states to determine eligibility of schools for Comprehensive Support and Improvement (CSI) in two ways:

1. All high schools (regardless of whether they received Title I funding) that have a three-year average graduation rate of less than 68 percent.

* Under the graduation rate criteria, California’s Consolidated ESSA State Plan requires any public high school whose average graduation rate has fallen below 68 percent for three consecutive years to be automatically eligible for CSI. However, for this year only, a two-year average graduation rate was used. This is due to a transition to the combined four-and five-year graduation rate. The California Department of Education calculated this new rate using information from the graduating classes of 2018 and 2019. Therefore, these two cohorts were used to calculate the two-year average. Moving forward, the three-year average will be used.

1. Under California’s ESSA State Plan, at least the lowest performing 5 percent of Title I–funded schools are determined to be eligible based on the state indicator data reported in the Dashboard, using the color combinations that schools receive at the school level (i.e., all student group level). These color combinations were approved by the State Board of Education at its July 2018 meeting (<https://www.cde.ca.gov/be/ag/ag/yr18/documents/jul18item02a1.docx>):

* Schools with all red indicators;
* Schools with all red but one indicator of any other color;
* Schools with five or more indicators where the majority are red; and
* Schools with all red and orange indicators.

All four criteria are applied, and a school that meets any of the four criteria is eligible.

Because there are not three years of data necessary to produce a color for the English Learner Progress Indicator (ELPI) a performance level (or color) cannot be determined for the ELPI state indicator on the 2019 Dashboard. The ELPI state indicator criteria for CSI–Lowest Performing Schools will be based on ELPI Status only. An ELPI Status level of ‘Very Low’ will be used as a proxy for the color ‘Red’ as meeting the criteria for

the ELPI state indicator in 2019–2020 CSI – Lowest Performing Schools determinations. ELPI color will be available beginning with the 2020 Dashboard.

In addition, the U.S. Department of Education requires states to establish a methodology for determining whether schools with a small *n* size (less than 30 students) are eligible for CSI regardless of whether they receive a performance color. As a result, criteria were developed to determine eligibility of schools without any performance colors due to their small *n* size (see below).

* For K–8 schools: Very Low Status for both English language arts (ELA) and mathematics and Very High Status (20.1 percent of more) for Chronic Absenteeism.
* For high schools: Very Low Status for both ELA and mathematics and a graduation rate below 68 percent (Very Low Status).

No new schools with a small *n* size were determined to be eligible for CSI – Lowest Performing this year. However, one school with a small *n* size identified in the prior year continued to meet the eligibility criteria in the current year.

Schools eligible for CSI based on the CSI – Graduation Rate in the 2018–19 year were reevaluated in the 2019–2020 year to determine continued eligibility or exit. Schools with a two-year average graduation rate at 68 percent or above will no longer be eligible for CSI based on the ‘CSI–Low Graduation Rate Schools’ criteria.

Schools initially eligible for CSI based on the ‘CSI Lowest–Performing Schools’ criteria in the 2018–19 year were reevaluated in the 2019–2020 year to determine continued eligibility or exit. A school is no longer eligible for support based on the ‘CSI Lowest–Performing Schools’ criteria when: 1) the school has improved performance so that it no longer meets any of the initial eligibility color combination criteria; and 2) at least one state indicator that had a red or orange in the prior year showed both an improvement in color and an improvement in status of at least one decimal point in the current year.

Additionally, schools designated as CSI Lowest–Performing in the 2018–19 year with a small *n* size in the current year will exit CSI Lowest–Performing if the school no longer meets the small *n* size school criteria.

Table 1 shows the number of schools eligible for CSI – Lowest Performing based on colors received on state indicators (i.e., criteria used to determine at least the lowest performing 5 percent of Title I schools).

**Table 1: Number of Schools Eligible for CSI – Lowest Performing by State Indicator Results: Breakdown by Color Performance**

| **Color Criteria** | **Number of Schools** |
| --- | --- |
| All Indicators Are Red | 103 |
| All Indicators Are Red, Except One of Any Color | 119 |
| Majority of Five or More Indicators Are Red | 51 |
| All Indicators Are Red and Orange | 204 |

Tables 2 and 3 provide a breakdown of CSI-eligible schools by Dashboard Alternative School Status (DASS) and non-DASS status.

**Table 2: Number of Schools Eligible for CSI – Lowest Performing by State Indicator Results: Breakdown by DASS and Non-DASS Schools**

| **Color Criteria** | **Number of DASS Schools** | **Number of Non-DASS Schools** |
| --- | --- | --- |
| All Indicators Are Red | 67 | 36 |
| All Indicators Are Red, Except One of Any Color | 34 | 85 |
| Majority of Five or More Indicators Are Red | 12 | 39 |
| All Indicators Are Red and Orange | 7 | 197 |

**Table 3: Number of Schools Eligible for CSI – Lowest Performing by State Indicator Results: Breakdown by Charter and Non-Charter Schools**

| **Color Criteria** | **Number of Charter Schools** | **Number of Non-Charter Schools** |
| --- | --- | --- |
| All Indicators Are Red | 6 | 97 |
| All Indicators Are Red, Except One of Any Color | 8 | 111 |
| Majority of Five or More Indicators Are Red | 7 | 44 |
| All Indicators Are Red and Orange | 13 | 191 |

It is important to note that the counts reflected in Tables 1 through 3 above do not include all schools in the CSI – Lowest Performing category. Schools meeting the small *n* size school eligibility criteria are not included in the counts. This year, there was one small *n* size school eligible for CSI – Lowest Performing.

Lastly, schools that did not meet the current year CSI – Lowest Performing eligibility criteria but also did not meet the exit criteria are excluded in the counts above.

# **Attachment 2**

## Additional Targeted Support and Improvement Eligibility Determinations

### Eligibility and Exit Criteria

In accordance with California’s Every Student Succeeds Act (ESSA) State Plan, schools that are not determined to be eligible for Comprehensive Support and Improvement (CSI) are eligible for Targeted Support and Improvement (TSI) if they have **one or more student group(s) that, for two consecutive years** (based on the 2018 California School Dashboard [Dashboard] and 2019 Dashboard), meet the same criteria used to determine at least the lowest performing 5 percent of Title I schools.

* All red indicators (student group must have at least two indicators);
* All red but one indicator of any other color;
* Five or more indicators where the majority are red; and
* All red and orange indicators.

Please note that a student group may meet the criteria based on a different color combination from one year to the next, but the **same student group must meet one of the color combinations in both years**.

Because there are not three years of data necessary to produce a color for the English Learner Progress Indicator (ELPI) a performance level (or color) cannot be determined for the ELPI state indicator on the 2019 Dashboard. The ELPI state indicator criteria for Additional Targeted Support and Improvement (ATSI) is based on ELPI Status only. An ELPI Status level of ‘Very Low’ is used as a proxy for the color ‘Red’ as meeting the criteria for the ELPI state indicator in 2019–2020 ATSI determinations. ELPI color will be available beginning with the 2020 Dashboard.

The criteria to determine schools eligible for ATSI are identical to the TSI criteria. Normally, TSI eligibility would be determined annually while ATSI would be determined every three years. However, in order to adhere to the State Plan, in 2018–19 all schools that met the criteria for TSI were moved into the ATSI category.

Schools that received Title I funds and schools that did not receive Title I funds are both eligible for TSI and ATSI. Schools initially eligible for ATSI in the 2018–19 year will be reevaluated in the 2019–2020 year to determine continued eligibility or exit. A school is no longer eligible for support based on the ATSI criteria when the qualifying student group(s) within the school: 1) have improved performance so that they no longer meet any of the initial eligibility color combination criteria; and 2) have at least one state indicator that had a red or orange in the prior year showed both an improvement in color and an improvement in status of at least one decimal point in the current year.

Additionally, schools initially eligible for ATSI in the 2018–19 year with no student groups in the current year meeting the n-size requirements will exit ATSI.

**A total of 1,043 schools were eligible for ATSI for the 2019–2020 school year.** Two student groups that most prevalently met the ATSI criteria were students with disabilities (598 schools) and African American students (255 schools).

Table 1 provides a breakdown of ATSI-eligible schools, showing how many schools met the criteria based on:

* One student group;
* Two student groups;
* Three student groups; and
* Four student groups.

**Table 1: Schools Eligible for ATSI Based on the Number of Student Groups Meeting the Criteria**

| **Number of Student Groups** | **Number of Schools** |
| --- | --- |
| 1 | 801 |
| 2 | 183 |
| 3 | 52 |
| 4 | 7 |

Tables 2 and 3 provide a breakdown of ATSI-eligible schools by Dashboard Alternative School Status (DASS) and charter status.

**Table 2: Schools Eligible for ATSI: Breakdown by DASS and Non-DASS Schools**

| **Number of DASS Schools** | **Number of Non-DASS Schools** |
| --- | --- |
| 42 | 1,001 |

**Table 3: Schools Eligible for ATSI: Breakdown by Charter and Non-Charter Schools**

| **Number of Charter Schools** | **Number of Non-Charter Schools** |
| --- | --- |
| 54 | 989 |