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# **MEMORANDUM**

**DATE:** February 13, 2023

**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 used to determine eligibility for support under the Every Student Succeeds Act (ESSA). Based on this review, the CDE found that 80 schools are no longer eligible for Additional Targeted Support and Improvement (ATSI). There were no changes to schools eligible for Comprehensive Support and Improvement (CSI). All changes are reflected in this updated information memorandum.

## Summary of Key Issues

As a follow up to the release of the Dashboard in December 2022, the California Department of Education (CDE) is providing this update to the State Board of Education (SBE) on schools eligible for CSI and ATSI based on the criteria in California’s ESSA State Plan.

This memorandum provides an overview of the eligibility criteria for schools approved by the SBE. The Memorandum also includes the number of schools by category and school type.

### Background

Under California’s ESSA State Plan, schools are eligible for CSI and ATSI based on their performance on the California School Dashboard (Dashboard) which is available at <https://www.caschooldashboard.org/>. The last time schools were evaluated for CSI and ATSI eligibility was in January 2020 following the release of the 2019 Dashboard. Due to the COVID-19 pandemic, schools that were determined to be eligible for CSI – Low Performing and ATSI based on the 2019 Dashboard have continued to be eligible due to a pause in the state and federal accountability requirements. However, schools that were determined to be eligible for CSI – Low Graduation Rate based on the 2019 Dashboard were allowed to exit if they met the exit criteria in 2021–22.

Local educational agencies (LEAs) with schools that meet the criteria for CSI must collaborate with educational partners to locally develop and implement a plan to improve student outcomes. The county office of education (COE) also plays a role in providing technical assistance and support to LEAs within its county that serve schools that meet the criteria for CSI.

In December 2021, the U.S. Department of Education (ED) released the 2021–22 Addendum Template for the Consolidated State Plan due to COVID-19 (Addendum) to provide states a streamlined process to modify state plans for only the 2021–22 school year as they implement accountability and school identification requirements. At the SBE March 2022 meeting (<https://www.cde.ca.gov/be/ag/ag/yr22/documents/mar22item04.docx>), the SBE approved California’s Addendum submission to the ED which proposed the following ESSA State Plan amendments for the 2021–22 school year only:

1. Shifting forward timelines two years for measurements of interim progress and long-term goals
2. Modifying the School Quality Indicator
3. Schools eligible for assistance
   1. Change in identification frequency
   2. Change in methodology
   3. Revising the entrance and exit criteria.

California’s Addendum request and the subsequent approval by the ED in August 2022 are available on the ESSA web page at <https://www.cde.ca.gov/re/es/>.

### CSI Eligibility Determinations

The ESSA requires that determinations of school eligibility for CSI are based on the following categories of schools:

1. Low graduation rate
2. Not less than the lowest performing five percent of Title I schools

Note: The data processing hierarchy required under the ESSA is to determine schools that meet the CSI – Graduation Rate first regardless of Title I funding status, then evaluate the remaining Title I schools for CSI – Low Performing eligibility. A detailed overview of the eligibility criteria for CSI determinations is provided in Attachment 1.

#### Low Graduation Rate

Any public high school whose average graduation rate is below 68 percent for three consecutive years is automatically eligible for CSI – Graduation Rate, regardless of its Title I funding status. This threshold reflects the adjustment adopted by the SBE at the September 2019 meeting (<https://www.cde.ca.gov/be/ag/ag/yr19/documents/sep19item01>) 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>).

#### Low Performing Title I Schools

The second category requires the state to include no less than 5 percent of the lowest-performing schools receiving Title I funds. It is important to note that Title I funding status for schools in the CSI – Low Performing 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 – Low Performing unless it meets the exit criteria. This year, one school is in the CSI – Low Performing category and did not receive Title I funds.

### Targeted Support and Improvement and ATSI

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, due to the COVID-19 pandemic, ATSI determinations will be made in 2022–23 and 2023–24. As a result, TSI determinations cannot be made until 2024–25.

Note: 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 the school support category by meeting the exit criteria included in the ESSA State Plan. More detailed information about ATSI eligibility and exit criteria are provided in Attachment 2.

### Fiscal Analysis (as appropriate)

School improvement activities are supported by funds from ESSA, Section 1003(a) school improvement funds, which requires the state to reserve seven percent of its Title I, Part A allocation and subgrant not less than 95 percent to LEAs to serve schools implementing CSI activities ESSA, Section 1003[b][1][A]). The California Budget Act of 2022 appropriated the following funds for LEAs and COEs in support of school improvement activities:

* **$133,228,00**: These funds are prioritized to support LEAs serving schools eligible for CSI based on the number of schools eligible for CSI, statewide.
* **$5 million**: Funds are allocated to each eligible COE through a formula that takes into consideration the number of schools eligible for CSI, statewide for the purposes of review and approval of 2023–24 CSI plans through the CSI prompts in the 2023–24 LEA Local Control and Accountability Plan.
* **$5 million**: Funds are allocated to each eligible COE through a formula that takes into consideration the number of schools eligible for CSI, statewide for the purposes of supporting development and implementation of 2023–24 CSI plans in coordination with the statewide system of support for LEAs established in the California State Plan for the federal ESSA.

## Overview of the 2022–23 CSI and ATSI Eligibility Determinations

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 no assistance.

**Table 1: 2022–23 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance**

| **Determination Status** | **Total** |
| --- | --- |
| **CSI** – Low Graduation Rate | 333 |
| **CSI** – Low Performing | 474 |
| **ATSI** | 6,209 |
| **No Assistance** | 2,927 |
| **Total Schools** | 9,943 |

Table 2 provides a summary of the breakdown of schools eligible for the two categories of CSI, ATSI, and no assistance for the 2019–20 school year. **This table is being provided for reference purposes only.**

Note: In 2019–20 ESSA eligibility determinations used performance colors on the state indicators from the 2019 Dashboard. Since the eligibility criteria for CSI and ATSI are not the same between 2019 and 2022, comparisons between these years **are not** valid or reliable. An overview of the changes on the 2022 Dashboard are available in an informational flyer, Reporting Current Year Data Only on the 2022 Dashboard, at <https://www.cde.ca.gov/ta/ac/cm/documents/reportcurrentyear22.pdf>. Additionally, provided the SBE an Information Memorandum on this topic in February 2020 which is available at <https://www.cde.ca.gov/be/pn/im/documents/apr20memoamard02.docx>.

**Table 2: 2019–20 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance**

| **Determination Status** | **Total** |
| --- | --- |
| **CSI** – Graduation Rate | 293 |
| **CSI** – Lowest Performing | 483 |
| **ATSI** | 1,043 |
| **No Assistance** | 8,151 |
| **Total Schools** | 9,970 |

Table 3 shows the number of schools eligible for the two categories of CSI, ATSI, and no assistance by charter status.

**Table 3: 2022–23 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance– By Charter Status**

| **Determination Status** | **Number of Non-Charter Schools** | **Number of Charter Schools** |
| --- | --- | --- |
| **CSI** – Low Graduation Rate | 228 | 105 |
| **CSI** – Low Performing | 435 | 39 |
| **ATSI** | 5,648 | 561 |
| **No Assistance** | 2,354 | 573 |

Table 4 shows the number of schools eligible for CSI, ATSI, and no assistance by Dashboard Alternative School Status (DASS) status. Of the 918 schools, 528 schools or 57.5 percent of DASS schools are identified for either CSI or ATSI. Note: Due to the denial of the DASS waiver by the U.S. Department of Education in January 2022, the modified methods for the graduation rate for DASS schools cannot be used. The increase in eligibility of DASS schools can be in part attributed to the waiver denial by ED.

For additional information on the support for DASS schools please see the DASS Community of Practice section in Attachment 1.

**Table 4: 2022–23 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance – By DASS Status**

| **Determination Status** | **Number of Non-DASS Schools** | **Number of DASS Schools** |
| --- | --- | --- |
| **CSI** – Low Graduation Rate | 40 | 293 |
| **CSI** – Low Performing | 345 | 129 |
| **ATSI** | 6,103 | 106 |
| **No Assistance** | 2,537 | 390 |

Table 5 shows the number of schools eligible for CSI, ATSI, and no assistance by Dashboard Alternative School Status (DASS) status for the 2019–20 school year. **Similar to Table 2, this table is being provided for reference purposes only.**

Of the 1007 schools, 401 schools or 39.8 percent of DASS schools were identified for either CSI or ATSI. Note: These figures are based on the 2019 Dashboard. As such, the calculations include the DASS modified methods for the graduation rate and academic indicators.

**Table 5: 2019–20 Summary Results of Schools Eligible for CSI, ATSI, and No 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 |
| **No Assistance** | 7,545 | 606 |

Table 6 shows the number of LEAs eligible for differentiated assistance under the LCFF with the number of schools eligible for CSI and ATSI.

**Table 6: 2022–23 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 – Low Graduation Rate | 333 | 204 | 61.3% |
| CSI – Low Performing | 474 | 391 | 82.5% |
| ATSI | 6,209 | 5,333 | 85.9% |

Table 7 provides the number of schools that were eligible for CSI/ATSI in 2019–20 but have met the exit criteria in 2022–23 based on the results from the 2022 Dashboard.

**Table 7: 2022–23 CSI and ATSI Exits**

| **ESSA Assistance Status** | **Number of Schools Meeting Exit Criteria** |
| --- | --- |
| CSI – Low Graduation Rate | 32 |
| CSI – Low Performing | 302 |
| ATSI | 149 |

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

(4 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 graduation rate has fallen below 68 percent for three consecutive years to be automatically eligible for CSI.

1. Under California’s ESSA State Plan, no less than 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 Status level combinations that schools receive at the school level (i.e., all student group level). These Status level combinations were approved by the State Board of Education (SBE) at its March 2022 meeting (<https://www.cde.ca.gov/be/ag/ag/yr22/documents/mar22item04.docx>) and approved by the ED in August 2022. The Addendum and ED approval are available on the Every Student Succeeds Act web page at <https://www.cde.ca.gov/re/es/>.

The CSI – Low Performing criteria for this reporting cycle (2022 California School Dashboard) are:

Criteria 1: Schools with all indicators **at the lowest status level**

Criteria 2: Schools with all indicators at the lowest status level **but one indicator** at **another** **status level**

Criteria 3: Schools with five or more indicators where **the majority are at the lowest status levels**

The SBE approved at their March 2022 meeting the use of Criteria 1 and 2 for CSI – Low Performing eligibility determinations. Using Criteria 1 and 2, the CDE was able to determine the required five percent of Title I funded schools for CSI – Low Performing. As a result, Criteria 3 was not used in CSI – Low Performing eligibility determinations.

### Small School Methodology

Schools with a Census Day 2021 enrollment between 11-29 students are eligible for CSI determinations based on small school criteria.

#### Eligibility Criteria for Elementary and Middle Schools

Small elementary and middle schools are eligible for CSI – Low Performing if they meet the following criteria:

* Census Day 2021 enrollment between 11 and 29
* All State Indicators reported on the 2022 Dashboard have an n-size less than 30
* Title I–funded school
* Academic – ELA Status level = Very Low
* Academic – Math Status level = Very Low
* Chronic Absenteeism Status value is 20.1% or higher.

Small elementary schools that meet the above criteria will be eligible for CSI – Low Performing.

#### Eligibility Criteria for High Schools

Small high schools, both Title I and non-Title I–funded, are eligible for CSI – Low Graduation Rate if they meet the following criteria:

* Census Day 2021 enrollment between 11 and 29
* All State Indicators reported on the 2022 Dashboard have an n-size less than 30
* Academic – ELA Status level = Very Low
* Academic – Math Status level = Very Low
* Graduation Rate Status value less than 68.0

Small high schools that meet the above criteria will be eligible for CSI – Low Graduation Rate.

### Dashboard Alternative School Status (DASS) Community of Practice (CoP)

DASS CoP schools eligible for CSI under the Low Graduation Rate or Low Performing criteria will be referred to as DASS CoP schools. The addition of “CoP” was first approved by the California State Board of Education (SBE) at the September 2022 SBE meeting to distinguish the uniqueness of DASS schools and the students they serve.

In addition, at its September 2022 meeting, the SBE also approved the implementation of a federal flexibility for LEAs with at least one DASS CoP school eligible for CSI under the Low Graduation Rate criteria with *less than 100 enrolled students*, to forgo implementation of all CSI-related improvement activities on behalf of its eligible schools. Student enrollment for this flexibility is based on data from Census Day 2021.

More information about DASS CoP schools and available flexibilities for CSI is available under the new DASS CoP tab on the CSI web page at <https://www.cde.ca.gov/sp/sw/t1/csi.asp>.

### Schools Exiting from CSI

Schools eligible for CSI based on the CSI – Low Graduation Rate in 2019–20 were reevaluated in 2021–22 to determine continued eligibility or exit. These schools were again reevaluated in 2022–23 to determine continued eligibility or exit. Schools with a three-year combined four-and five-year graduation rate at 68 percent or above are no longer eligible for CSI based on the ‘CSI – Low Graduation Rate Schools’ criteria.

Schools initially eligible for CSI based on CSI – Low Performing in 2019–20 were reevaluated in 2022–23 to determine continued eligibility or exit. A school is no longer eligible for CSI – Low Performing criteria when:

1. The school no longer meets any of the CSI Status level combination eligibility criteria for entry; **and**
2. At least one state indicator that had a performance color of Red or Orange on the 2019 Dashboard has an improvement of Status level percent of at least 0.1 for that indicator from the 2019 Dashboard to the 2022 Dashboard.

Under the requirements in the ESSA Addendum approved by the ED, for the English Learner Progress Indicator, Graduation Rate, and Academic Indicators there has to be an increase of at least 0.1. For the Suspension Rate and Chronic Absenteeism Rate Indicators there has to be a decrease of at least 0.1.

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

**Table 1: 2022–23 Number of Schools Eligible for CSI – Low Performing by State Indicator Results: Breakdown by Color Performance**

| **Status Level Criteria** | **Number of Schools** |
| --- | --- |
| Schools with all indicators at the lowest status level | 124 |
| Schools with all indicators at the lowest status level but one indicator at another status level | 316 |

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

**Table 2: 2022–23 Number of Schools Eligible for CSI – Low Performing by State Indicator Results: Breakdown by DASS and Non-DASS Schools**

| **Status Level Criteria** | **Number of DASS Schools** | **Number of Non-DASS Schools** |
| --- | --- | --- |
| Schools with all indicators at the lowest status level | 78 | 46 |
| Schools with all indicators at the lowest status level but one indicator at another status level | 50 | 266 |

**Table 3: 2022–23 Number of Schools Eligible for CSI – Low Performing by State Indicator Results: Breakdown by Charter and Non-Charter Schools**

| **Status Level Criteria** | **Number of Charter Schools** | **Number of Non-Charter Schools** |
| --- | --- | --- |
| Schools with all indicators at the lowest status level | 4 | 120 |
| Schools with all indicators at the lowest status level but one indicator at another status level | 32 | 284 |

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 – Low Performing.

In addition, schools eligible for CSI – Low Performing in 2022–23 are not reflected in the counts above if those schools: (1) did not meet the eligibility criteria in the current year; but (2) did not meet the criteria to exit CSI – Low Performing category.

## 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 Additional Targeted Support and Improvement (ATSI) if they have **one or more student group(s) that, for two consecutive years** based on the California School Dashboard (Dashboard), meet the same criteria used to determine at least the CSI – Low Performing schools. However, in California’s approved COVID-19 Addendum, ATSI eligibility determinations in 2022–23 will be based on only one year of Dashboard results (i.e., the 2022 Dashboard). Schools are eligible for ATSI if one or more student groups (see below) meet one of the following criteria:

* All indicators at the lowest status level; or
* All indicators at the lowest status level but one indicator at another status level

The first criterion applies for all student groups that have at least **one** state indicator with a n-size 30 or greater. The second criterion applies for all student groups that have **two or more** indicators that have met the n-size 30 or greater.

Both Title I and non-Title I–funded schools may be eligible for ATSI. Schools initially eligible for ATSI in 2019–20 will be reevaluated in 2022–23 to determine continued eligibility or exit. A school is no longer eligible for ATSI when:

1. The school does not meet any of the ATSI Status level combination eligibility criteria for entry; **and**
2. A student group eligible in 2019–20, had at least one state indicator with a performance color of Red or Orange on the 2019 Dashboard and has an improvement of Status level percent of at least 0.1 for that indicator from the 2019 Dashboard to the 2022 Dashboard.

For the English Learner Progress Indicator, Graduation Rate, and Academic Indicators, there has to be an increase of at least 0.1. For the Suspension Rate and Chronic Absenteeism Rate Indicators there has to be a decrease of at least 0.1.

**A total of 6,209 schools are eligible for ATSI for the 2022–23 school year.** The four student groups that most commonly qualify schools for ATSI are Student with Disabilities (4,966 schools), Two or More Races (1,257 schools), Black/African American (1,518 schools), and Homeless (1,120 schools).

Table 1 provides a breakdown of ATSI-eligible schools, showing how many schools met the criteria based on the number of student groups meeting the criteria.

**Table 1: 2022–23 Schools Eligible for ATSI Based on the Number of Student Groups Meeting the Criteria**

| **Number of Student Groups** | **Number of Schools** |
| --- | --- |
| 1 | 2,636 |
| 2 | 1,752 |
| 3 | 907 |
| 4 | 530 |
| 5 | 226 |
| 6 | 102 |
| 7 | 42 |
| 8 | 11 |
| 9 | 3 |

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

**Table 2: 2022–23 Schools Eligible for ATSI: Breakdown by DASS and Non-DASS Schools**

| **Number of DASS Schools** | **Number of Non-DASS Schools** |
| --- | --- |
| 106 | 6,103 |

**Table 3: 2022–23 Schools Eligible for ATSI: Breakdown by Charter and Non-Charter Schools**

| **Number of Charter Schools** | **Number of Non-Charter Schools** |
| --- | --- |
| 561 | 5,648 |