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# **MEMORANDUM**

**DATE:** February 1, 2024

**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.

## Summary of Key Issues

As a follow up to the release of the California School Dashboard (Dashboard) in December 2023, the California Department of Education (CDE) is providing this update to the State Board of Education (SBE) on schools eligible for Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) based on the criteria in California’s Every Student Succeeds Act (ESSA) State Plan amendments approved by the U.S. Department of Education (ED) in November 2023. This is the first year of a three-year eligibility cycle for schools in CSI and ATSI. The next time California will determine eligibility for CSI and ATSI will be following the release of the 2026 Dashboard.

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 Dashboard which is available at <https://www.caschooldashboard.org/>. 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.

At the September 2023 SBE meeting, the SBE approved the following amendments to the ESSA State Plan related to the timeline for frequency of school identification and exit criteria for CSI and ATSI schools:

* In response to the flexibilities provided by the 2021–22 COVID-19 State Plan Addendum (Addendum) by ED, revising the timeline for frequency of school identification. Specifically, following the 2022 determinations, schools will be identified once every three years effective in fall 2023.
* Revising the timeline and statewide exit criteria for schools identified for Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) by:
  + Adjusting the timeline and not counting the 2019–20 or 2021–21 school years toward the number of years in which a school must meet the criteria in order to exit CSI and ATSI status.
  + Modifying the exit criteria for schools identified for CSI and ATSI that will be eligible to exit status in fall 2022 to use the status performance level rather than the performance color that is based on both status and change. The school or student subgroup in the school must (1) no longer meet the criteria for identification and (2) have improved performance on the indicators (including an increase in the status portion of each indicator) compared to when the school was initially identified.
  + Modifying the State-determined number of a years that a school identified for ATSI has to meet the exit criteria; ATSI schools identified in the fall of 2018, 2019, 2022, and 2023 will all have until fall 2026 to meet the exit criteria.

The ED approved these amendments in November 2023. California’s ESSA State Plan is 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 funded 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 Title I-funded schools. 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, five schools 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 using the results of the 2024 Dashboard.

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 is 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 2023 appropriated the following funds for LEAs and COEs in support of school improvement activities:

* **$135,495,000**: 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 2024–25 CSI plans through the CSI prompts in the 2024–25 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 2024–25 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: 2023–24 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance

| **Determination Status** | **Total** |
| --- | --- |
| **CSI** – Low Graduation Rate | 289 |
| **CSI** – Low Performing | 540 |
| **ATSI** | 2,363 |
| **No Assistance** | 6,852 |
| **Total Schools** | 10,044 |

Table 2 provides a summary of the breakdown of schools eligible for the two categories of CSI, ATSI, and no assistance for the 2022–23 school year. **This table is being provided for reference purposes only.**

Note: In 2022–23 ESSA eligibility determinations used Status levels on the state indicators from the 2022 Dashboard. Since the eligibility criteria for CSI and ATSI are not the same between 2022 and 2023, comparisons between these years **are not** valid or reliable.

### Table 2: 2022–23 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance

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

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

### Table 3: 2023–24 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance– By Charter Status

| **Determination Status** | **Number of Charter Schools** | **Percent of Charter Schools** | **Number of Non-Charter Schools** | **Percent of Non-Charter Schools** |
| --- | --- | --- | --- | --- |
| **CSI** – Low Graduation Rate | 98 | 7.7% | 191 | 2.2% |
| **CSI** – Low Performing | 51 | 4.0% | 489 | 5.6% |
| **ATSI** | 187 | 14.7% | 2,176 | 24.8% |
| **No Assistance** | 937 | 73.6% | 5,915 | 67.4% |
| **Total** | 1,273 | 100.0% | 8,771 | 100.0% |

Table 4 shows the number of schools eligible for CSI, ATSI, and no assistance by Dashboard Alternative School Status (DASS) status. Of the 954 DASS schools, 456 schools or 47.8 percent of DASS schools eligible for either CSI or ATSI. Last year, 57.5 percent of DASS schools were eligible for either CSI or ATSI (see Table 5).

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

### Table 4: 2023–24 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance – By DASS Status

| **Determination Status** | **Number of DASS Schools** | **Percent of DASS Schools** | **Number of Non-DASS Schools** | **Percent of Non-DASS Schools** |
| --- | --- | --- | --- | --- |
| **CSI** – Low Graduation Rate | 267 | 28.0% | 22 | 0.2% |
| **CSI** – Low Performing | 121 | 12.7% | 419 | 4.6% |
| **ATSI** | 68 | 7.1% | 2,295 | 25.2% |
| **No Assistance** | 498 | 52.2% | 6,354 | 69.9% |
| **Total** | 954 | 100.0% | 9,090 | 100.0% |

Table 5 shows the number of schools eligible for CSI, ATSI, and no assistance by Dashboard Alternative School Status (DASS) status for the 2022–23 school year. **Similar to Table 2, this table is being provided for reference purposes only.**

Of the 918 DASS schools, 528 schools or 57.5 percent were eligible for either CSI or ATSI.

### Table 5: 2022–23 Summary Results of Schools Eligible for CSI, ATSI, and No Assistance– By DASS Status

| **Determination Status** | **Number of DASS Schools** | **Percent of DASS Schools** | **Number of Non-DASS Schools** | **Percent of Non-DASS Schools** |
| --- | --- | --- | --- | --- |
| **CSI** – Low Graduation Rate | 293 | 31.9% | 40 | 0.4% |
| **CSI** – Low Performing | 129 | 14.1% | 345 | 3.8% |
| **ATSI** | 106 | 11.5% | 6,103 | 67.6% |
| **No Assistance** | 390 | 42.5% | 2,537 | 28.1% |
| **Total** | 918 | 100.0% | 9,025 | 100.0% |

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: 2023–24 Number of Non-Charter Schools Located in LEAs (Districts and COEs only) 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 | 289 | 173 | 59.9% |
| CSI – Low Performing | 540 | 416 | 77.0% |
| ATSI | 2,363 | 1,735 | 73.4% |

Table 7 shows the number of charter schools eligible for both differentiated assistance under the LCFF and eligible for CSI or ATSI.

### Table 7: 2023–24 Number of Charter Schools Eligible for Differentiated Assistance and ESSA Assistance

| **Assistance Type** | **Number of Charter Schools Eligible for ESSA Assistance** | **Number of Charter Schools Eligible for Differentiated Assistance and ESSA Assistance** | **Percent of Schools in Charter School Eligible for Differentiated Assistance and ESSA Assistance** |
| --- | --- | --- | --- |
| CSI – Low Graduation Rate | 98 | 50 | 51.0% |
| CSI – Low Performing | 51 | 26 | 51.0% |
| ATSI | 187 | 68 | 36.4% |

Table 8 provides the number of schools that were eligible for CSI/ATSI in 2022–23 but have met the exit criteria in 2023–24 based on the results from the 2023 Dashboard.

### Table 8: 2023–24 CSI and ATSI Exits

| **ESSA Assistance Status** | **Number of Schools Meeting Exit Criteria** |
| --- | --- |
| CSI – Low Graduation Rate | 46 |
| CSI – Low Performing | 320 |
| ATSI | 3,971 |

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 (5 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 (Title I-funded schools and non-Title I-funded schools) 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 California School Dashboard (Dashboard), using the performance color combinations that schools receive at the school level (i.e., all student group level).

For CSI–Low Performing, the lowest-performing Title I-funded schools will be determined based on state indicators data from the 2023 Dashboard, using the Performance Color combinations that schools receive at the **school-level** (i.e., not student group level) on the Dashboard state indicators:

* English language arts/literacy Indicator
* Mathematics Indicator
* English Learner Progress Indicator
* Graduation Rate Indicator
* Suspension Rate Indicator
* Chronic Absenteeism Indicator
* College/Career Indicator

Please note that while the ELPI only applies to English learners (ELs), it is used in CSI Lowest Performing determinations for schools.

California will identify not less than five percent of Title I-funded schools for CSI–Low Performing using the following hierarchical criteria:

* Criterion 1: All **Red** indicators
* Criterion 2: All **Red** indicators except for one indicator of another Performance Color
* Criterion 3: Five or more indicators where the majority are **Red**
* Criterion 4: All **Red and Orange** indicators

Please note the College/Career Indicator (CCI) will only report on Status level on the 2023 Dashboard, and, as a result, a Status level of Very Low will be used as a proxy for Red in CSI–Low Performing.

CDE was able to determine the required five percent of Title I-funded schools for CSI – Low Performing using only criteria 1, 2, and 3. As a result, criterion 4 was not used in CSI – Low Performing eligibility determinations.

### Small School Methodology

Schools that do not receive a performance level (color) on any of the following State indicators on the 2023 Dashboard are eligible for CSI through Small School CSI eligibility determinations:

* ELA Indicator,
* Mathematics Indicator,
* Chronic Absenteeism Indicator,
* Graduation Rate Indicator,
* Suspension Rate Indicator,
* English Learner Progress Indicator, and
* College/Career Indicator.

#### Determining Small Schools Eligible for CSI–Low Graduation Rate

All schools with an n-size between 11-29 students for each of the following State indicators will be evaluated for CSI–Low Graduation Rate:

* ELA
* Math
* Graduation Rate

CSI–Low Graduation Rate eligibility criteria for all schools that have graduation data are as follows:

* ELA Status level = Very Low (1); and
* Math Status level = Very Low (1); and
* Graduation Rate Status less than 68.0%

Small schools that meet the CSI–Low Graduation Rate criteria for Small Schools are removed from the pool for CSI–Low Performing Small Schools eligibility determinations.

#### Determining Small Schools Eligible for CSI–Low Performing

All Title I-funded schools with an n-size between 11-29 students for each of the following State indicators are evaluated for CSI–Low Performing:

* ELA
* Math
* Chronic Absenteeism

CSI–Low Performing eligibility criteria for Title I-funded schools are as follows:

* ELA Status level = Very Low (1); and
* Math Status level = Very Low (1); and
* Chronic Absenteeism Status equal to or greater than 20.1%

### Dashboard Alternative School Status Community of Practice

Dashboard Alternative School Status (DASS) Community of Practice (CoP) schools eligible for CSI under the Low Graduation Rate or Low Performing criteria are 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 *fewer 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 will be evaluated on an annual basis to determine continued eligibility or exit for CSI–Low Graduation Rate and CSI–Low Performing. Those eligible under the CSI–Low Performing category in 2022–23 were reevaluated in 2023–24.

Schools eligible for CSI – Low Graduation Rate in 2022–23 were reevaluated in 2023–24 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.

A school is no longer eligible for CSI−Low Performing when both of the following criteria are met:

* **Exit Criterion 1:** School does not meet any of the CSI−Low Performing eligibility criteria for entry; and
* **Exit Criterion 2:** On the 2022 Dashboard, the school had at least one state indicator at the lowest status level. The school must show improvement in Change on at least one indicator on the 2023 Dashboard.

Improvement in Change is different by state indicator:

* ELA and Mathematics indicator, a Change of **+0.1** distance from standard points
* ELPI and Graduation Rate, a Change of **+0.1** percentage points.
* Suspension Rate and Chronic Absenteeism, a Change of **-0.1** percentage points.

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

#### Table 1: 2023–24 Number of Schools Eligible for CSI – Low Performing by State Indicator Results: Breakdown by Color Performance

| **Status Level Criteria** | **Number of Schools** |
| --- | --- |
| All **Red** indicators | 77 |
| All **Red** indicators except for one indicator of another Performance | 179 |
| Five or more indicators where the majority are **Red** | 281 |

Tables 2 and 3 provide a breakdown of CSI-eligible schools by DASS and non-DASS status.

#### Table 2: 2023–24 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** |
| --- | --- | --- |
| All **Red** indicators | 55 | 32 |
| All **Red** indicators except for one indicator of another Performance | 76 | 148 |
| Five or more indicators where the majority are **Red** | 24 | 268 |

#### Table 3: 2023–24 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** |
| --- | --- | --- |
| All **Red** indicators | 7 | 80 |
| All **Red** indicators except for one indicator of another Performance | 20 | 204 |
| Five or more indicators where the majority are **Red** | 32 | 260 |

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 were two school one small *n* size school eligible for CSI – Low Performing.

In addition, schools eligible for CSI – Low Performing in 2023–24 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.

Schools are eligible under the ATSI criteria if one or more student groups meet one of the following criteria on the **2022 and 2023 Dashboards**:

#### Table 1: ATSI Entry Criteria

| **Criteria** | **2022 Dashboard Criteria** | **2023 Dashboard Criteria** |
| --- | --- | --- |
| Criterion 1 | All indicators at the **lowest Status level** | All **Red** indicators |
| Criterion 2 | All indicators at the **lowest Status level** except one indicator of another Status level | All **Red** indicators **except for one indicator of another performance color** |
| Criterion 3 | Five or more indicators where the majority are at the **lowest Status level**. | Five or more indicators where the majority are **Red** |

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-funded and non-Title I–funded schools may be eligible for ATSI. Schools initially eligible for ATSI in 2022–23 will be reevaluated in 2023–24 to determine continued eligibility or exit. A school is no longer eligible for ATSI when both of the following criteria are met:

* **Exit Criterion 1:** School does not meet any of the ATSI eligibility criteria for entry; and
* **Exit Criterion 2:** On the 2022 Dashboard, the school had at least one state indicator at the lowest status level. The school must show improvement in Change on at least one indicator on the 2023 Dashboard.

Improvement in Change is different by state indicator:

* ELA and Mathematics indicator, a Change of **+0.1** distance from standard points
* ELPI and Graduation Rate, a Change of **+0.1** percentage points.
* Suspension Rate and Chronic Absenteeism, a Change of **-0.1** percentage points.

**A total of 2,363 schools are eligible for ATSI for the 2023–24 school year.** The four student groups that most commonly qualify schools for ATSI are Student with Disabilities (1,117 schools), Black/African American (447 schools), Two or More Races (369 schools), and English Learner students (364 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: 2023–24 Schools Eligible for ATSI Based on the Number of Student Groups Meeting the Criteria

| **Number of Student Groups** | **Number of Schools** |
| --- | --- |
| 1 | 1,688 |
| 2 | 494 |
| 3 | 130 |
| 4 | 43 |
| 5 | 8 |

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

#### Table 2: 2023–24 Schools Eligible for ATSI: Breakdown by DASS and Non-DASS Schools

| **Number of DASS Schools** | **Number of Non-DASS Schools** |
| --- | --- |
| 68 | 2,295 |

#### Table 3: 2023–24 Schools Eligible for ATSI: Breakdown by Charter and Non-Charter Schools

| **Number of Charter Schools** | **Number of Non-Charter Schools** |
| --- | --- |
| 187 | 2,176 |