

**Report to Congress on Support Programs and
Resource Allocation Monitoring Findings (Title I, Part A)**
August 29, 2024

In the fiscal year (FY) 24 Appropriations Act, Congress directed the U.S. Department of Education (Department) to produce a report that summarizes the Department’s process, findings, and actions it is requiring or recommending State educational agencies (SEAs) to take in response to all monitoring and performance reviews of State implementation of Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965 (ESEA). Congress noted that it was particularly interested in findings related to: the identification of schools for comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI); school improvement plan requirements in sections 1111(d)(1)-(2); and local educational agency (LEA) resource allocation reviews in section 1111(d)(3).

This report provides a summary of findings related to identification of schools and support for school improvement across all States for the period from October 2019 through May 2024. This includes the identification of CSI, TSI, and ATSI schools; support for school improvement, including school improvement plan requirements in sections 1111(d)(1)-(2) and LEA resource allocation reviews in section 1111(d)(3); and ESEA section 1003 school improvement fund requirements.

Overview of Performance Reviews

During the period covered in this report, the Department has undertaken two primary methods of monitoring SEAs with respect to Title I—consolidated monitoring and targeted monitoring—in addition to our annual review of key ESEA State and local report card requirements.

A short description of the approach for each is described below.

Consolidated Monitoring

Consolidated monitoring consists of a coordinated review of SEA implementation of a number of ESEA K-12 grant programs that are awarded to the SEA via a formula, in which the SEA is then a pass-through entity to provide subgrants to LEAs. The goals of consolidated monitoring are to conduct a thorough review of several programs through a single, streamlined process that results in improved and strengthened partnerships between the Department and States, and encourages States to develop and effectively implement integrated and coherent consolidated State plans. To accomplish these goals, consolidated monitoring is organized into cross-cutting sections that review fiscal and programmatic requirements across the included programs and program-specific sections that consider how the SEA implements specific programs. These reviews help the Department understand State compliance across all aspects of the specific programs included in the review; highlight promising State practices; and inform the Department’s technical assistance efforts.

Consolidated monitoring is comprised of a self-assessment that the SEA completes as a first step, followed by an on-site or desk review, which is largely driven by SEA responses to the self-assessment and the documentation submitted along with the self-assessment. The self-assessment and on-site or desk review protocols are organized by domains and sections that reflect fiscal and some programmatic requirements of OESE-covered programs.

The following States that participated in consolidated monitoring are included in this summary: Florida, Kentucky, Maine, Maryland, Montana, Nebraska, Nevada, New Jersey, New Mexico, Ohio, Oklahoma, Tennessee, and Washington.

Title I Targeted Monitoring

As part of the Department’s efforts to implement Title I and provide all children significant opportunity to receive a fair, equitable, and high-quality education, the Department implemented a Title I targeted monitoring protocol beginning in 2022. This work complements consolidated monitoring by adding oversight of and assistance to SEAs on a subset of important and timely provisions. In 2022, the Department’s review focused on two related resource equity requirements under the ESEA: 1) an SEA’s periodic review of resource allocation to support school improvement as required in ESEA section 1111(d)(3)(A)(ii); and 2) requirements that the school and LEA identify the resource inequities to be addressed in CSI and ATSI plans, as required in ESEA section 1111(d)(1)(B)(iv) and (2)(C). In 2023, Title I targeted monitoring focused on SEA implementation of State and local report card requirements in ESEA section 1111(h)(1) and (2) as well as the educator equity provisions in ESEA section 1111(g)(1)(B). In 2024, Title I targeted monitoring focused on SEA implementation of ESEA section 1003 school improvement activities; as of September 1, 2024, this review is still in progress.

Consistent with the Congressional directive, the following States that participated in the 2022 targeted monitoring on the resource equity provisions related to school improvement are included in this summary: Colorado, Connecticut, Iowa, Kentucky, Massachusetts, North Carolina, Rhode Island, South Carolina, and Utah.

The table below is taken directly from the final monitoring reports provided to each State. The table repeats the information from the individual State monitoring report which includes a description of the issue, required action(s) and recommendation(s) for the elements in Title I that were requested by Congress. For more information, including the reports for all of the Department’s consolidated and Title I targeted monitoring and the monitoring protocols used by the Department, please see: <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/performance-review/>.

Appendix A
Title I Monitoring Required Actions and Recommendations, by State

FY – Monitoring Type (Consolidated or Targeted)	Requirement	SEA	Issue	Actions Required and Recommendations
2019 – Consolidated	Support for School and LEA Improvement ESEA § 1003(b)-(f), 1111(d)(1)-(2), and 1111(d)(3)(A)	Montana Office of Public Instruction (OPI)	In accordance with ESEA section 1111(d)(3)(A)(i)(I), exit criteria for all schools identified for comprehensive support and improvement (CSI), including small schools, must ensure continued progress to improve student academic achievement and school success in the State. OPI described an annual process for the identification and exit of small schools identified for CSI, but OPI could not demonstrate that small schools must demonstrate continued progress to improve student academic achievement and school success in order to exit CSI status.	Within 30 business days of receiving this report, OPI must provide a plan and timeline detailing how it will determine CSI exit criteria for small schools that ensure that the schools demonstrate continued progress to improve student academic achievement and school success in order to exit CSI status. <i>Recommendations</i> The Department recommends that OPI amend its consolidated State plan to specify how it will determine the school made sufficient growth for the ATSI school to exit school improvement (i.e., whether it will consider growth of all students in the school or certain subgroups of students when determining if a school is eligible to exit ATSI status).
2019 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2)	New Jersey Department of Education (NJDOE)	The ESEA requires that schools identified for CSI and ATSI identify resource inequities as part of their school improvement plans. This may include a review of LEA and school-level budgeting (ESEA section 1111(d)(1)(B)(iv) and 1111(d)(2)(C)). NJDOE’s statewide Annual School Plan (ASP) template, which it requires any school identified for CSI or ATSI to complete, does not include identification of resource inequities.	Within 60 days of receiving this report, NJDOE must submit to the Department evidence that it has incorporated resource inequities into its ASP template for schools identified for CSI or ATSI or has developed another method to ensure that each school improvement plan to be implemented beginning with the 2020-2021 school year.
2019 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	New Jersey Department of Education (NJDOE)	Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will: 1. Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if applicable; 3. Monitor schools receiving funds;	Within 60 business days of receiving this report, NJDOE must submit to the Department: 1. An updated ESEA section-1003 application that includes a description of how the LEA will use a rigorous review process to recruit, screen, select, and evaluate any external partners with which the LEA will partner in carrying out activities supported with school improvement funds, and an assurance that each school the LEA proposes to serve will receive all of

		4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans. The application must also include an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would have received in the absence of ESEA section 1003 funds. NJDOE’s LEA application did not include a description of how the LEA will use a rigorous review process to recruit, screen, select, and evaluate any external partners with which the LEA will partner in carrying out activities supported with school improvement funds or an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would have received in the absence of school improvement funds. During the performance review, NJDOE noted that although the application did not require a description for how the LEA will use a rigorous review process for external partners, this information could be implied by general assurances. However, an assurance is not sufficient to meet the ESEA requirements that the LEA describe its rigorous review process. NJDOE also noted that although there was no specific assurance that each school would receive all the State and local funds it would otherwise receive in the absence of section 1003 funds, it was part of a more general supplement, not supplant assurance that all LEAs must adhere to in the consolidated grant application. ESEA section 1003(e) requires that an LEA submit an application specifically for the purposes of receiving section 1003 funds. Therefore, for both missing elements, a general assurance outside	the State and local funds it would have received in the absence of school improvement funds. Evidence that it has added to its subrecipient monitoring protocol questions on the use of ESEA section-1003 funds.
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			of the section 1003 application is not sufficient to meet statutory requirements. In addition, ESEA section 1003(b)(2)(B) requires that the SEA monitor and evaluate the use of funds by all LEAs that receive ESEA section 1003 funds. During the performance review, the Department found that NJDOE does not include use of these funds in its subrecipient monitoring protocol. NJDOE noted that it plans to add this to its monitoring tool in the future.	
2020 – Consolidated	Support for School Improvement ESEA § 1111 (d)(1)-(2), and 1111(d)(3)(A)	Kentucky Department of Education (KDE)	ESEA section 1111(d)(1)(B) requires that for each school identified by the State for comprehensive support and improvement, the LEA locally develop and implement a comprehensive support and improvement plan for the school to improve student outcomes that is informed by all indicators in the State’s system of annual meaningful differentiation. KDE submitted sample plans, based on templates developed by KDE. However, because the Progress in Achieving English Language Proficiency (ELP) indicator is included in the calculation of the Other Academic indicator (i.e., “Student Growth”) for elementary and middle schools and included in the calculation of the School Quality and Student Success indicator (i.e., “Transition Readiness”) for high schools, the Progress in Achieving ELP indicator may not necessarily be used to inform the comprehensive support and improvement plan. Similarly, ESEA section 1111(d)(2)(B) requires that each school notified as a targeted support and improvement school must develop and implement a targeted support and improvement plan based on all indicators in the State’s system of annual meaningful differentiation for each subgroup of students that was the subject of the notification. For the same reasons described above, the Progress in Achieving ELP indicator may not necessarily be used to inform the targeted support and improvement plan.	<i>Recommendations</i> The Department recommended that KDE either revise its template for comprehensive support and improvement plans to more clearly differentiate the Progress in Achieving ELP indicator from the Other Academic and School Quality and Student Success indicators or develop procedures to ensure that these plans are informed by this indicator, when applicable.
2022 – Targeted	State Educational Agency Review of Resource Allocation	Kentucky Department of Education (KDE)	The Kentucky Department of Education’s (KDE’s) resource allocation reviews involve a self-assessment completed by the local educational agencies (LEAs) with a significant number of	<i>Recommendations</i> The Department recommends that KDE:

	ESEA § 1111(d)(3)(A)(ii)	schools identified for comprehensive support and improvement (CSI), targeted support and improvement due to consistently underperforming subgroups (TSI), or additional targeted support and improvement (ATSI). For the purpose of the resource allocation reviews, KDE has defined an LEA with more than one school and more than 10 percent of its schools identified for CSI, TSI, or ATSI as having a “significant” number of identified schools. KDE implemented its most recent resource allocation review process in the 2020-2021 school year, following more limited reviews in the 2018-2019 school year that considered resources as part of KDE’s diagnostic reviews of schools identified for CSI. In 2020-2021, KDE conducted resource allocation reviews for each of the six LEAs that had a “significant” number of identified schools. KDE plans to conduct resource allocation reviews every three years beginning in the 2022-2023 school year. This process was adapted from an on-site process to a remote format due to the COVID-19 pandemic. As part of its resource allocation reviews in 2020-2021, KDE held a technical assistance webinar for LEAs included in the review. KDE’s resource allocation reviews focused on fiscal and staffing resources, including teacher salaries, per-pupil expenditures, and correlations between each school’s proficiency rates in reading/language arts and mathematics and per-pupil spending in the self-assessments. KDE annually collects each LEA’s staffing allocation policies and KDE also used staff reviews of this information already available at the SEA to further inform the resource allocation reviews. KDE’s resource allocation reviews focus on comparisons of schools within LEAs (e.g., the highest- and lowest-poverty schools). KDE staff conducted a review of the LEA self-assessments and provided feedback to the LEAs using a standardized feedback form. The standardized feedback form described disparities in	• Include as part of its internal resource allocation review process the steps it takes for reviewing LEA staffing allocation policies to help standardize the process across reviews. • Include as part of its resource allocation review material provided to LEAs a description of its review of LEA staffing allocation policies so that LEAs are informed about how the LEA staffing allocation policies are used for KDE’s resource allocation reviews. • Revise its annual school needs assessment and improvement planning templates in its planning process to more explicitly address resource allocation reviews for the LEAs for which KDE conducts the reviews and to support KDE’s intent to embed resource allocation reviews into KDE’s broader school improvement efforts. • Consider further developing the post-review process to use the results to support the school improvement efforts (across LEAs and schools). For example, KDE efforts may be strengthened by adding additional steps such as assisting LEAs and schools in addressing resource inequities and reviewing how the resource allocation reviews are assisting LEAs and schools in identifying and addressing existing inequities.
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			resources, provided each LEA with observations and comments about identified resource inequities, and listed additional questions for the LEA to consider. KDE has also taken actions as a result of the resource allocation reviews. For example, KDE described that following its resource allocation reviews, it modified its processes for awarding ESEA section 1003 school improvement funds, changing from award amounts based on proposals in LEA applications to a per-pupil method to provide a more equitable distribution of funds to identified schools. Though KDE’s follow-up with LEAs after the reviews has been informal, KDE described changes in resource allocation in one LEA following the review (modifications to its student-centered, weighted-funding-index), while also noting the changes were due to multiple factors. As part of its continuous improvement approach, KDE is considering improvements for its resource allocation reviews, such as for broadening the resources included and providing visualizations of related data for LEAs included in the resource allocation reviews.	
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	Kentucky Department of Education (KDE)	<i>Comprehensive Support and Improvement Plans</i> KDE requires CSI plans, known in Kentucky as Comprehensive School Improvement Plans (CSIPs), to be developed using a KDE template that includes all statutory requirements and submitted to the SEA for review and approval. KDE’s CSI plan review process is how it ensures that CSI plans identify and address resource inequities. Specifically, KDE includes a description of the requirement to identify resource inequities in CSI plans and, when the SEA conducts its review of plans, it uses a checklist that includes a check for identifying and addressing resource inequities. Notably, KDE’s current CSI plan template includes a section with a prompt focused on the requirement to identify and address resource inequities. However, this section of the plan is not required for CSI schools and is only required for ATSI schools.	<i>Recommendations</i> The Department recommends that KDE: Clearly describe in the CSI and ATSI plan templates and any associated guidance how to identify specific, measurable resource inequities in the plans. For example, KDE could require that the “Identification of Critical Resource Inequities,” which is currently only required for ATSI plans, be required for CSI plans. Additionally, KDE could consider providing guidance on specific and measurable resources to examine, such as those included in the SEA’s resource allocation review. Finally, KDE could provide further guidance on methodologies that may be used to identify the specific, measurable resource inequities (e.g., compared to other schools in the LEA or compared to the LEA as a whole,

			Because there is no single section in the CSI plan template where a school identifies and outlines how it will address resource inequities, this information is found throughout the CSIP. For example, in one CSI plan, the school appears to provide professional development to address instructional resource inequities. During the Department’s targeted monitoring, KDE provided examples of other identified resource inequities found in CSI plans for Kentucky schools, such as evidence-based instructional resources, high-quality professional learning, adequate staffing, and teacher experience. KDE also provided examples of addressing resource inequities in CSI plans, such as additional staff, co-teaching model, social-emotional programs, professional learning opportunities, and additional instructional materials. Additionally, KDE requires that resource inequities be identified in LEA School Improvement Fund (SIF) applications, through which all CSI schools receive school improvement funds under ESEA section 1003. For example, one LEA’s SIF application describes per-pupil expenditures at one CSI elementary school compared to the LEA average and describes generally why resource inequities exist in CSI schools in the LEA and how the LEA tries to allocate additional funds to the schools with fewer resources. In terms of the stakeholder engagement required for CSI plans, KDE requires that CSI schools collaborate with principals, teachers, parents, and community stakeholders on the superintendent’s advisory leadership team. The executive summary document, which accompanies each CSI plan, also describes the process used to develop the CSI plan and includes information on stakeholder engagement. KDE has multiple methods of monitoring the implementation of CSI plans. First, a KDE “Education Recovery” (ER) team works	examining resources for ATSI plans that may be most relevant for the student subgroups that led to the ATSI identification). • Update the CSI and ATSI plan templates to clearly connect the identification of a resource inequity with a strategy or evidence-based intervention that will address the resource inequity. For example, KDE could update the table for the “Identification of Critical Resource Inequities” that is currently required in the ATSI plan template to include one column entitled “Identified Resource Inequity” and one column entitled “Addressing Identified Resource Inequity” and have multiple rows for individual resource inequities identified. • Update KDE’s existing monitoring efforts (e.g., during the regular meetings with ER team or during the two-day site visit by a contractor) to measure or examine progress being made to address the identified resource inequities. For example, in future monitoring, if the CSI plan indicates that an estimated percentage of students do not have access to specific instructional resource and the school is spending resources to provide those instructional resources, the monitoring could include a focus to review the current estimated percentage of students with access to the instructional resource (along with a review to see if the instructional resource is improving student outcomes for those students) to determine progress on addressing that resource inequity. If KDE finds during monitoring that those resource inequities are not being addressed by the current plan as expected, it could then recommend that the CSI plan be updated to find another way of addressing the specific resource inequity.
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			closely with LEA and CSI school-level administrative staff during the implementation of the CSI plan. Second, KDE conducts a two-day progress monitoring visit with each CSI school that is focused on improvement priorities and use of improvement funds. The two-day progress monitoring report provides ratings to the school on two items relevant to resource inequities: (1) the institution provides access to information, resources, and materials to support the curriculum, programs, and needs of students, staff, and the institution and (2) the institution allocates human, material, and fiscal resources in alignment with the institution’s identified needs and priorities to improve student performance and organizational effectiveness. Although the CSI school receives a rating on these two items, the monitoring visit does not necessarily elaborate further on these items because it focuses on priority areas determined by the CSI schools. Finally, because KDE includes information on resource inequities in its SIF applications, KDE’s monitoring template for the SIF asks “How did or how will you ensure that the school’s needs assessment and identified resource inequities align to any amendments [to SIF plans]? Describe the process for ensuring alignment.” <i>Additional Targeted Support and Improvement Plans</i> KDE provides a required ATSI CSIP plan template, similar to the one provided for CSI schools, to ATSI schools to complete and submit to the LEA for review and approval. Additionally, as part of its school improvement efforts, KDE’s “Education Recovery” (ER) team works closely with LEA and school-level administrative staff to describe the requirements for the monitoring and implementation of ATSI plans. The ER team reviews ATSI plans with a KDE-developed rubric. A KDE program director meets virtually or in-person with each LEA or school to review and discuss the plan. KDE’s rubric has a section devoted to “Critical Resource Inequities” and in order for KDE to determine that the plan meets the State’s criteria, it must include a process for reviewing the allocation and use of resources	
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			(people, time, and money), address any resource inequities that are identified that may contribute to underperformance, and explain how identified resource inequities will be addressed. KDE provides feedback to the ATSI school in the notes section of the rubric, often asking for more specific detail. During the Department’s targeted monitoring, KDE provided examples of resource inequities identified in ATSI plans, in areas such as access to content specialists, access to grade-level content, adequate instructional time, adequate staffing, and evidence-based instructional strategies. Additionally, KDE provided example strategies for addressing resource inequities included in ATSI plans, such as changes to schedules, co-teaching models, additional staffing, and professional learning providers/opportunities.	
2021 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), and 1111(d)(3)(a)	Nevada Department of Education (NDE)	ESEA section 1111(d) requires each school identified for comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI) to develop and implement a support and improvement plan. NDE provided its School Performance Plan (SPP) template, which it also uses to meet the requirements for schoolwide program plans. Sections of these templates do not appear to have been fully updated since the ESEA was reauthorized and still contain references to No Child Left Behind. In addition, the template does not address the following statutory requirements: 1. ESEA section 1111(d)(1)(B)(i) and 1111(d)(2)(B)(i) – The plan is informed by all indicators described in subsection (c)(4)(B), including student performance against State-determined long-term goals; 2. ESEA section 1111(d)(1)(B)(ii) and 1111(d)(2)(B)(ii) – The plan includes evidence-based interventions; and 3. ESEA section 1111(d)(1)(B)(iv) and 1111(d)(2)(C) – The plan identifies resource inequities, which may include a review of LEA- and school-level budgeting, to be addressed through implementation of such CSI [or ATSI] plan.	Within 60 business days of receiving a final report, NDE must submit to the Department: 1. Evidence that it has incorporated explicit analysis of accountability indicators as each relate to the school’s performance, evidence-based interventions, and identification of resource inequities into its SPP template for schools identified for CSI or ATSI, or has developed another method to ensure that each school improvement plan to be implemented beginning with the 2021-2022 school year meets statutory requirements. 2. An updated CSI/TSI/ATSI guidance document that is consistent with ESEA section 1111 (d)(1)(B)(iv) and 1111(d)(2)(C). 3. A timeline and a plan or ensuring that the SEA completes the resource allocation review of each LEA serving a significant number of CSI or TSI schools. The plan should include procedures for periodically conducting resource allocation reviews in the future. On a State-determined timeline, NDE must also provide evidence of implementation of the plan to resolve this action.

			Although the State requires the schools to refer to several data sources and include a summary of trend analysis for each data source (pages 2-3 of the SPP template), including data related to the accountability system, there is no explicit reference to the accountability indicators in section 1111(c)(4)(B). The budget section (beginning on page 13 of the SPP template) asks the school to describe “strategies to increase family engagement in accordance with Section 1118 of the NCLB.” There does not appear to be any section for LEAs to include evidence-based interventions and the ESEA evidence tier in the provided SPP template. While the SPP template asks the school to list resources needed but it does not require a CSI or ATSI school to identify resource inequities. NDE also provided the SPP review rubric it uses to evaluate the school’s plan. Item 28 asks, “To what degree are the coordination of funds used to provide evidence-based interventions?” The reviewer selects from a scale of 1-4 and is asked to provide “detailed comments” for all budget items at the end of the section. It is not clear from this process that NDE ensures that the evidence-based intervention meets the threshold of tiers 1-3, as defined in ESEA section 8101(21). Further, while the State provided an updated SPP review rubric, one of the LEAs that the Department interviewed provided an out-of-date SPP review rubric from 2015-2016, which was aligned with No Child Left Behind. The LEA included links to the old rubric on numerous guidance documents demonstrating a lack of clarity across the State on the components and requirements of the SPP as defined by the current ESEA. ESEA section 1111(d)(3)(A)(iii)(II) requires the SEA to provide technical assistance to each LEA in the State serving a significant number of schools implementing targeted support and improvement plans. Although NDE provided its CSI/TSI/ATSI	In addition, within 30 business days of receiving comments from the Department on the updated CSI/TSI/ATSI guidance, NDE must submit a subrecipient monitoring plan that ensures that all LEAs are meeting their obligation to review and approve TSI plans and provides support to LEAs serving a significant number of schools implementing TSI plans.
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			guidance to LEAs, NDE does not have protocols in place for technical assistance or oversight to ensure that LEAs are meeting statutory requirements to review and approve TSI plans. Further, at least one LEA interview indicated that it had not met the statutory requirements regarding oversight of TSI schools and TSI school plans. ESEA section 1111(d)(3)(A)(ii) specifies that the SEA periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI and TSI schools. NDE explained that in 2019, in collaboration with LEAs, the State initiated a two-year partnership with a national research group to conduct a research study looking at data related to resource allocation in identified schools. The State reported this work was put on hold with the onset of the COVID-19 pandemic and had not been completed. Additionally, the State did not provide evidence that it has protocols or procedures to conduct periodic resource allocation reviews, consistent with ESEA section 1111(d)(3)(A)(ii).	
2021 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f), 1111(d)(1)-(2)	Nevada Department of Education (NDE)	ESEA section 1003(b)(1)(A) requires that the State shall allocate not less than 95 percent of the amount it reserves to make grants to LEAs, on a formula or competitive basis, to serve schools implementing comprehensive or targeted support and improvement activities under ESEA section 1111(d). In the State-submitted protocol and supporting documentation, NDE reported that the SEA awards section 1003 funds to LEAs on a competitive basis. Upon discussion with two LEAs and subsequent documentation from the State and the two LEAs, NDE awarded some of its section 1003 funds in FY2019 and FY2020, using a noncompetitive process, to LEAs to support additional CSI and TSI schools from LEA applications that were not previously funded under the original grant process.	Within 60 business days of receiving this report, NDE must submit to the Department the procedures and criteria used to make ESEA section 1003 awards from funds subsequent to the initial awards (e.g., the award on September 24, 2019, to Clark County School District for \$3,028,157 and the opportunity offered to LEAs in email on July 17, 2020). If NDE is unable to demonstrate that these subsequent awards were made consistent with statutory requirements within ESEA section 1003, it may result in further corrective action(s).

			NDE indicated that it opted to distribute excess funds to LEAs in accordance with ESEA section 1126(c). However, any excess funds remaining from ESEA section 1003, regardless of the reason, are subject to the requirements in ESEA section 1003(g). ESEA section 1003(g) allows an SEA to allocate excess funds if, after consultation with LEAs, it determines that the full amount of funds is not necessary to support school improvement. It does not appear that NDE followed this process. Based on documentation provided by the SEA and two LEAs, in July 2020, NDE informed the LEAs that the SEA had “excess funds available for reallocation to eligible LEAs for the 2020-2021 school year/fiscal year 2021.” The SEA did not provide evidence that consultation with LEAs occurred to determine that the full amount of funds was not necessary. Therefore, it does not appear that NDE met the requirements to reallocate funds under section 1003(g) and, in regard to the additional awards, NDE did not provide evidence that demonstrates how the supplemental awards met the requirements of ESEA section 1003.	
2021 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Tennessee Department of Education (TDOE)	ESEA section 1003 requires an SEA to reserve funds to serve schools implementing comprehensive or targeted support and improvement activities. TDOE provided materials for eight separate grant programs associated with section 1003 funds: 1. District Priority School Improvement Grant (DPSIG) 2. Turnaround Action Grant (TAG) 3. Adaptive Learning Technology Grant (ALT) 4. Additional Targeted Support and Improvement Grant (ATSI) 5. School-Level Improvement Grant (SLIG) 6. Success Rate Grant 7. Priority School Exit Grant 8. Priority Principal Leadership Incentive (no separate materials were provided for this program; however, information was included in the Division of School Improvement Standard Operating Procedures document on page 17).	Within 60 business days of receiving this report, TDOE must provide: 1. Allocation information for each of the separate grant programs illustrating the amount of ESEA section 1003 funds that were used to support each program. 2. Evidence that, for each grant program supported with ESEA section 1003 funds, it meets all ESEA section 1003 requirements. This could include updated application templates or sample applications, and standard operating procedures or award rubric that documents how funds are awarded to LEAs.

			However, during the review and in the subsequent documentation, the Department was unable to verify that TDOE was meeting the requirements of ESEA section 1003 for each of the grant programs listed above. In addition to the items described below, TDOE did not provide any evidence or documentation for the following grant programs: 1. Priority Exit Grant 2. Success Rate Grant 3. Priority Principal Leadership Incentive (which was described on page 17 of the Division of School Improvement Standard Operating Procedures document). <i>ESEA section 1003(b)</i> ESEA section 1003(b) outlines how an SEA may allocate its 1003 school improvement funds to LEAs, whether on a formula or competitive basis. The Department was unable to verify which of the grant programs were funded with ESEA section 1003 funds. For several of the programs (e.g., Priority Exit, Success Rate, Priority Principal Leadership Incentive), it was unclear if TDOE allocated funds via a formula or competition. <i>ESEA section 1003(f)</i> ESEA section 1003(f) requires an SEA, when allocating 1003 funds to LEAs, to give priority to LEAs that (1) serve high number, or high percentage of, elementary and secondary schools implementing plans under section 1111(d), (2) demonstrate the greatest need of such funds, and (3) demonstrate the strongest commitment to using funds under this section to enable the lowest-performing schools to improve student achievement and student outcomes. For those grant programs that were allocated via a competition (e.g., SLIG), the Department could not verify that TDOE met the requirements of ESEA section 1003(f).	
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			<i>ESEA section 1003(e)</i> ESEA section 1003(e) outlines the information that each LEA is required to submit to the SEA in an application to receive ESEA section 1003 funding. Although TDOE provided several sample applications for some of the programs listed above, those applications did not include all required elements. Of those applications that TDOE submitted, the Department identified the following missing items: 1. Section 1003(e)(1)(A) requires a description of how the LEA will develop comprehensive support and improvement plans under section 1111(d)(1) in order to receive 1003 funds. Of those applications that TDOE provided, the following do not provide evidence of this requirement: • DPSIG • TAG • SLIG • ALT 2. Section 1003(e)(1)(B) requires an LEA to describe how it will support schools developing or implementing targeted support and improvement plans under section 1111(d)(2) in order to receive 1003 funds. Upon review of the submitted grant applications, the following do not provide evidence of this requirement: • SLIG • ALT 3. Section 1003(e)(1)(C) requires the LEA describe how it will monitor schools receiving funds under this section, including how the LEA will carry out the requirements in section 1111(d)(2)(B) if funds received under this section are used to support schools implementing TSI plans. Of the provided grant applications, the Department is unable to verify how the DPSIG application meets this requirement. 4. Section 1003(e)(1)(D) requires the LEA to describe how it will use a rigorous review process to recruit, screen, select, and	
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			evaluate any external partners with whom the LEA will partner. After reviewing the submitted grant applications, the following do not provide evidence of this requirement: • DPSIG • TAG • ALT 5. Section 1003(e)(1)(E) requires the LEA to describe how it will align other Federal, State, and local resources to carry out the activities supported with 1003 funds. Upon review of the submitted grant applications, the following do not provide evidence of this requirement: • TAG • SLIG • ATSI • ALT 6. Section 1003(e)(1)(F) requires the LEA to describe how it will modify practices and policies to provide operational flexibility that enables full and effective implementation of CSI and TSI plans, as applicable. Upon review of the submitted grant applications, the following do not provide evidence of this requirement: • DPSIG • TAG • ALT Additionally, there is no evidence of how TDOE meets the requirements of sections 1003(e) or 1003(f) with respect to the following grant programs: • Priority Exit Grant • Success Rate Grant • Priority Principal Leadership Incentive (which was described on page 17 of the Division of School Improvement Standard Operating Procedures document).	
2021 – Consolidated	School Identification ESEA §	Tennessee Department of	ESEA section 1111(c)(4)(D)(i)(III) requires an SEA to establish comprehensive support and improvement (CSI) identification methodology for public schools that do not meet established exit	<i>Recommendations</i>

	1111(c)(4)(D), 1111(c)(4)(C)(iii), 1111(d)(2)(C)-(D), and 1111(d)(3)(A)(i)(II)	Education (TDOE)	criteria for additional targeted support and improvement (ATSI) school identification after a State-determined number of years. Tennessee has yet to identify its first cohort of CSI – not exited ATSI schools. Tennessee calls TSI/ATSI schools “focus schools.” Focus schools that earn a designation for the same underserved student group for three consecutive identification cycles would be classified for CSI–not exited ATSI. The first round of identification was to take place in fall 2020 but, due to assessment and accountability waivers for the 2019-2020 school year, identification was delayed. There are discrepancies between the 2019 Accountability Protocol and the ESEA consolidated State plan. In the State plan, focus schools that “are identified for the same historically underserved student group(s) for three consecutive cycles” will be designated as a CSI – not exited ATSI school (p. 101). However, TDOE’s 2019 Accountability Protocol states schools that are identified for ATSI in “two consecutive cycles” will become CSI – not exited ATSI schools (p. 45). TDOE indicated during the interview that both “three consecutive cycles” and “two consecutive cycles” mean three years of data was necessary before a school would be identified as CSI – not exited ATSI.	The Department recommends that TDOE use consistent language in all documents to reflect the three years of data required for an ATSI school to be identified as CSI–not exited ATSI school.
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	Colorado Department of Education (CDE)	<i>Comprehensive Support and Improvement Plans</i> State law requires each school and LEA create or update a Unified Improvement Plan (UIP) annually. CDE requires each school identified for CSI to submit this annual UIP, which is reviewed and approved by the LEA and submitted to CDE. CDE then reviews, provides feedback, and approves the UIP for each CSI school, its CSI plan, using a rubric to ensure it meets requirements. Generally, the rubric details the ESEA requirements for a CSI plan, provides guiding questions on how to fulfill these requirements, and the scale by which CDE evaluates the plan (i.e., does not meet expectations to meets expectations at a high level with required evidence) on each requirement. Question 5 of the rubric cites ESEA section 1111(d)(1)(B)(iv) and defines the requirement for LEAs to identify resource inequities and describe how the plan will address any identified inequities. The rubric	Within 60 business days of receiving this letter, CDE must submit evidence that it ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that CDE: Update the CSI and ATSI plan review rubrics to require each plan clearly connect the identification of a resource inequity with an activity, strategy, or evidence-based intervention that will address the resource inequity. For example, if the CSI

		provides guiding questions on comparing funding, educator, and instructional data between identified and non-identified schools to identify inequities (e.g., does the identified school have equitable access to the same funding as non-identified schools?) for schools and LEAs to answer while creating the CSI plan. CDE encourages schools to use the approval rubric as a checklist when creating UIPs and provides training on the requirements of CSI plans, including the requirement to identify and address resource inequities. For CDE to evaluate a CSI plan as ‘meets expectation’ or above on the rubric’s evaluation scale, the plan must both identify disparities (e.g., disparate per pupil expenditures, inequitable distribution of teachers, or inequitable access to rigorous courses) and select actions that address identified resource inequities. The sample CSI plans provided by CDE identify resource inequities (e.g., gaps in teacher planning time and student access to adequate facilities) and include priority areas that address the identified inequities. CDE annually monitors LEAs using the Tier III process described in section A, and the monitoring protocol includes a review of the implementation of CSI plans. CDE may also monitor LEAs on the implementation of CSI plans using Tier I or II monitoring, but CDE targets its Tier I and II monitoring to include a subset of all requirements that CDE selects and updates annually. As a result, the Tier I and II monitoring may not include a review of the implementation of CSI plans in a particular year. <i>Additional Targeted Support and Improvement Plans</i> CDE requires each LEA to submit a consolidated application annually that includes questions on how the LEA reviews and approves plans for a school identified for additional targeted support and improvement (ATSI). The guidance for the consolidated application includes the requirement for stakeholder engagement (e.g., how does the LEA ensure that each ATSI school develops an improvement plan in partnership with stakeholders?) but does not ensure an LEA reviews that each ATSI plan identifies resource inequities to be addressed through	plan indicates that there is a specific and measurable inequity in teacher experience levels in the CSI school compared to other non-identified schools in the LEA, the CSI plan may indicate that it will redirect current professional development expenditures towards a particular set of topics for less experienced teachers. • Update CDE’s existing monitoring efforts (e.g., annual Tier II and III monitoring) to measure or examine progress being made to address the identified resource inequities. For example, in future monitoring, if CDE finds that the current CSI or ATSI plans do not address an identified resource inequity as expected, CDE could recommend updates to the approved methodology in the plan to address the specific resource inequity.
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			implementation of the plan. An ATSI school’s UIP may identify some resource inequities in the narrative portion, but CDE does not require schools to use the UIP template for ATSI plans. In the guidance documents submitted as supporting evidence for this review, CDE consistently references the requirement to identify and address resource inequities in CSI plans. However, presentations submitted for this review from trainings for LEAs do not include the requirement for ATSI plans. Additionally, the requirement for LEAs to review that ATSI plans identify and address resource inequities is missing from CDE’s monitoring program requirements. Although the requirement appears in the ESEA “universal indicator” column of the example LEA-level 2019-2020 Tier III monitoring report, there is no evidence in the “next steps” column that CDE reviewed to ensure the LEA reviewed and approved the ATSI plan, for the one school with this status, consistent with requirements. <i>Other Technical Assistance and Support</i> CDE provides several supports to LEAs and schools on the process and requirements for CSI and ATSI plans through its website, including its Accountability Handbook, which outlines the requirements for LEAs with CSI and ATSI schools to identify and address resource inequities in plans. CDE also provides both schools and LEAs “Quality Criteria Rubrics,” which offer guidance for creating high quality improvement plans and establish the criteria for which SEA- and LEA-level review.	
2022 – Targeted	State Education Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	Connecticut State Department of Education (CSDE)	The Connecticut State Department of Education (CSDE) is developing plans to review resource allocation to support school improvement in local educational agencies (LEAs) serving a significant number of schools identified for comprehensive, targeted, and additional targeted support and improvement (CSI, TSI, and ATSI respectively). However, CSDE has not yet finalized its process nor conducted its first resource allocation review. In the self-assessment and desk review, CSDE shared a tool that is integral to its planned, future processes, called a resource allocation review (RAR) report. The RAR report is a	Within 60 business days of receiving this letter, CSDE must confirm its plan and timeline, outlined above, for conducting resource allocation reviews in the 2022-2023 school year consistent with the requirements in ESEA section 1111(d)(3)(A)(ii). In accordance with the State’s plan, and no later than September 2023, CSDE must submit evidence that it implemented this plan during the 2022-2023 school year (e.g., final procedures for reviewing resource allocation, sample documents from a completed resource-allocation review with an LEA).

		dashboard with data visualizations that combine the fiscal data of per pupil expenditure (PPE) disaggregated by source (e.g., State or local funds) from the 2017-2018, 2018-2019, and 2019-2020 school years with school-level characteristics (e.g., percent high needs, percent English learner, percent free and reduced price lunch, accountability index, staff experience, staffing levels, enrollment, grade range, locale, and organization type) and permits a user to filter the resulting visualization by districts, turnaround schools (CSI or TSI schools) and focus schools (ATSI schools). During the desk review, CSDE stated that it released the RAR report to LEAs and will make it public on its EdSight platform in fall 2022. CSDE provided a timeline to implement a future resource allocation review process: 1. In the next 2 months (by July 2022), CSDE will provide LEAs with the RAR report and training on its use. 2. In the next 6 months (by October 2022), CSDE will use the RAR report to analyze school- and LEA-level spending to create a list of LEAs to review. 3. In the next 12 months (by May 2023), CSDE will conduct monitoring conversations with LEAs selected through the analysis in step 2. CSDE also referenced plans to implement resource allocation reviews in one of the three monitoring conversations it already conducts with Alliance Districts, a State category that includes the lowest-performing 36 LEAs determined by the State’s system of annual meaningful differentiation. In the self-assessment and during the desk review, CSDE also shared that it is finalizing a methodology to determine which LEAs serve a significant number of identified schools. CSDE described plans to create a list of LEAs to include in pilot discussion protocols around resources using the analysis of PPE data in the RAR report dashboard. Additionally, CSDE shared plans to focus on 10 LEAs identified as Opportunity Districts, a	<i>Recommendations</i> The Department recommends that CSDE: • Align its resource allocation reviews with its cycle of identification for CSI and ATSI status. • Establish a methodology to determine which LEAs serve a “significant” number and/or percentage of CSI, TSI, and ATSI schools, such that it is targeting its efforts on the LEAs serving the greatest number of identified schools and/or the greatest percentage of schools identified within the LEA. For example, two SEAs included in the Department’s targeted monitoring pilot determine that an LEA has a significant number of identified schools if at least 10 percent of the schools in the LEA are identified for CSI, TSI, or ATSI. The Department does not recommend a specific number of LEAs for CSDE to include in its resource allocation reviews.
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			State category that includes the lowest-performing 10 LEAs, and to select a subset of three to four LEAs using a protocol that is under development. While CSDE’s approved ESEA consolidated State plan states that it will annually review LEA resource allocations (pg. 56), CSDE shared in the self-assessment and desk review that it is still determining the frequency of resource allocation reviews. CSDE plans to conduct two cycles of resource allocation reviews during the 2022-2023 school year and will establish a frequency for future reviews. CSDE indicated that the data used in its RAR report refreshes on an annual basis and may provide the basis of determining the frequency of conducting periodic reviews of resource allocations. CSDE shared that, while it has engaged multiple staff across offices within the SEA, its engagement of other stakeholder groups has been limited. CSDE described and provided documentation regarding plans to engage LEAs to solicit overall feedback, to improve its discussion protocol, and to add user scenarios to the RAR report user guide at the annual Alliance District Symposium which occurred in September 2022. CSDE shared future plans to update and publish its RAR report and to conduct additional comparisons between LEAs. CSDE plans updates to include filters on the RAR report and/or monitoring discussion questions that expand the definition of resource from fiscal, which is currently included in its RAR report, to include staffing resources and considerations, instructional resources, and physical resources. CSDE also plans to make the RAR report available to the public. Finally, CSDE plans to use the suggested comparisons of resources between entities (e.g., LEAs with identified schools to LEAs without identified schools; identified schools to schools in LEAs without identified schools; and identified schools to schools that are not identified within the same LEA) to revise its monitoring discussion protocol.	
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2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	Connecticut State Department of Education (CSDE)	<i>Comprehensive Support and Improvement Plans</i> Every school identified for CSI in Connecticut completes a CSI plan through one of three processes. Alliance Districts, a State-level category that include 36 LEAs with the lowest accountability index measures in the State’s system of annual meaningful differentiation, include all schools identified for CSI. Generally, a CSI school submits its improvement plan to CSDE’s Turnaround Office which reviews the plan with a rubric to ensure it meets all requirements, provides feedback to the school and LEA, and approves the plan once it meets all requirements. The CSI plan template for schools in the Alliance District requires the LEA to check an assurance that the CSI plan was developed in partnership with stakeholders, including school leaders, teachers, and parents. CSDE provided two example CSI plans which include the identification of resource inequities (within the analysis of root causes) with interventions to address the root causes and inequities identified earlier in the plan. CSDE monitors each Alliance District three times per year through site visits, data conversations, and monitoring meetings using the Alliance District Monitoring Tracker template which includes a progress worksheet for each priority in the school improvement plan for each identified school in the LEA. There are two exceptions to the CSI planning process described above for (1) a CSI school that is a recipient of ESEA section 1003 school improvement funds and (2) a CSI school that is part of the Commissioners Network Cohort (Cohort). CSI schools in these categories complete their CSI plans through the State’s School Improvement Grant (SIG) application or the Cohort, respectively. 1. CSDE annually reviews SIG applications to ensure that they identify and address resource inequities. The CSI school identifies resource inequities through the needs assessment and the areas for growth inform the school’s reform priorities. For each school plan within CSDE’s SIG application (Part II	Within 60 business days of receiving this report, CSDE must submit evidence for its Cohort schools that it ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA has updated its templates for CSI plans, guidance, and monitoring protocol, as necessary).
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			School Plan), the LEA must describe the process used to complete a needs assessment, including how family and community stakeholders were engaged in the process and how the specific needs of the family and community were identified. The LEA must assure that the needs assessment was completed with stakeholder engagement. The SIG review rubric rates applications based on the quality description of stakeholder engagement during the needs assessment process. 2. CSI schools within the Cohort have additional school-level autonomy in exchange for heightened accountability. The State Board of Education approves CSI plans developed for schools in the Cohort, and schools must participate in the Cohort for a minimum of three years. CSDE conducts an operations and instructional audit on Cohort schools in accordance with State law. The audit must identify “governance, legal, operational, staffing or resource constraints that contributed to the lack of student academic performance at such school and should be addressed, modified or removed for such school to improve student academic performance.” The school must then develop its CSI plan based on the findings within the audit. Unlike the CSI plan and review processes for Alliance Districts and SIG grantees, the required plan for Cohort schools does not explicitly require the identification of resource inequities to be addressed through implementation of the CSI plan. The CSI plan only requires the school to identify the resources needed to implement the interventions within the plan, rather than resource inequities. Although the identification of resource inequities is likely included in the CSI plan due to Connecticut State law, it is unclear if identified schools in the Cohort undergo adequate checks in the plan development or approval process to ensure that the requirement is met. While it appears that the audit requires a Cohort CSI school to identify resource inequities and align plan initiatives with those inequities, it is not apparent that the identified resource inequities and strategies are ultimately incorporated into the	
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			Cohort school's CSI plan. Each CSI plan in the Cohort must include a description of the stakeholder engagement process and structures for planning and development, implementation, and revising the CSI plan to meet current needs. Additionally, plan development is led by a Turnaround Committee, which State law requires to include an administrator, parents, teachers, and the Commissioner or superintendent of schools for the LEA. <i>Additional Targeted Support and Improvement Plans</i> CSDE notifies LEAs of the requirement to develop and implement an ATSI plan that identifies and addresses resource inequities. CSDE provides a District Checklist and Approval for Targeted Support and Improvement Schools document for LEAs to use to support ATSI schools. LEAs are not required to submit the checklist to CSDE; however, the State will periodically monitor LEAs with ATSI schools and requires this completed checklist as documentation for a monitoring review. Section 4 of the checklist includes that the school implement an improvement plan that identifies and addresses resource inequities. The checklist also notes that LEAs must review, approve, and monitor school improvement plans for schools identified for ATSI and refers schools and LEAs to visit the School Improvement Resource webpage for additional guidance. CSDE also noted that all but one ATSI school is either in the Cohort or a SIG grantee. Therefore, the ATSI plans for these schools are developed and monitored using the process described above for CSI schools. The one exception is an ATSI school within an Alliance District. The State requires the LEA superintendent to assure that the school has developed and is implementing the ATSI plan. Those schools also participate in Alliance District monitoring activities, as described above.	
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			<i>Other Technical Assistance and Support</i> CSDE’s cross-divisional team partners with the Department’s Regional Comprehensive Center, the Council of Chief State School Officers (CCSSO), and the National Implementation Research Network (NIRN) to engage LEAs in communities of practice and provide training opportunities on tools to support the identification and addressing of resource inequities in CSI and ATSI plans.	
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	Iowa Department of Education (IDOE)	During school year 2019-2020, the Iowa Department of Education (IDOE) provided information and guidance to all local educational agencies (LEAs) with at least one school identified for comprehensive support and improvement (CSI), targeted support and improvement (TSI), or additional targeted support and improvement (ATSI) (approximately 200 LEAs) on completing the IDOE-developed “ESSA Resource Review Worksheet.” The LEAs were expected to complete this worksheet during that school year and, as further described in section B, were required to use these completed worksheets for school improvement purposes, including a data element in the District and Building-Level Self-Assessment of Multi-Tiered System of Supports (MTSS) needs assessment. However, after IDOE provides the worksheet to LEAs, the State educational agency (SEA) does not have a process to review resource allocations at the State-level, including collecting the completed worksheets, conducting its own review of the completed worksheets, or taking action to support school improvement in the LEAs. During the desk review, IDOE indicated that it may examine the completed worksheets during site visits with LEAs and schools but does not yet have a consistent process or plan in place to do so. Accordingly, IDOE’s past procedures would not meet the requirement for the SEA, itself, to periodically conduct a resource allocation review as required by section 1111(d)(3)(A)(ii) of the Elementary and Secondary Education Act of 1965 (ESEA). The State’s ESSA Resource Review Worksheet consists of a table where the LEA includes information on resources, student	Within 60 business days of receiving this letter, IDOE must submit evidence that it: - Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA has updated its templates for CSI plans, guidance, and monitoring protocol, as necessary). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that: - As the SEA determines how it will review resource allocations, it pilot a process for the 20222023 school year that targets its efforts on the LEAs serving the greatest number of CSI and TSI/ATSI schools and/or the greatest percentage of schools identified within the LEA. By piloting this process with these LEAs, the SEA can refine its review procedures to best support school improvement in LEAs serving a “significant” number and/or percentage of CSI and TSI/ATSI schools, as the SEA deems appropriate.

			demographics, and the overall accountability score for each school in the LEA; the table also includes a column for applicable information about the LEA as a whole. The worksheet allows the LEA to include funding resources such as per-pupil expenditures (including Federal, State, and local dollars), “at-risk” expenditures, English learner expenditures, special education expenditures, gifted expenditures, and teacher leadership and compensation (TLC) expenditures. The worksheet also allows the LEA to examine other resources such as the percentage of teachers with a conditional license or without proper endorsement, instructional hours per year, percentage of kindergarten students who attended preschool in the prior year, and full-time equivalent teachers coded to the TLC expenditures. Finally, the worksheet also notes a recommended data source for each piece of information that may be included. The Department commends IDOE for its plans to use a broader definition of resources that encompasses more than funding for purposes of its resource allocation review. After IDOE identifies schools for CSI, TSI, and ATSI during the 2022-2023 school year, it plans to review resource allocations for LEAs with a significant number of schools identified for CSI, TSI, and ATSI. The SEA plans to work closely with its CSI, TSI, and ATSI schools and provide regional trainings on using the ESSA Resource Review Worksheets. The SEA also intends to partner with its nine intermediary Area Education Agencies (AEAs) to provide support and technical assistance on topics like the ESSA Resource Review Worksheet to all LEAs with schools identified for CSI, TSI, or ATSI. Finally, IDOE indicated that it is still considering how it will conduct resource allocation reviews in the future, including plans for communication with LEAs and schools, publication of results, additional technical assistance efforts, and any other actions the SEA may take following a review.	• If the SEA’s future resource allocation review process includes using a similar ESSA Resource Review Worksheet: ○ Add a row to the worksheet to indicate whether a school is identified for CSI, TSI, or ATSI, in order to ensure the review is focused on the reasons a school was identified to support school improvement efforts rather than all schools in the LEA. Currently the worksheet does not appear to allow for any distinction. ○ Prepopulate as much of the worksheet as possible based on data available at the SEA before distributing the worksheets to LEAs in order to ensure consistency with the SEA’s review of resources and reduce burden on the LEAs.
2022 – Targeted	Identifying and Addressing Resource Inequities in	Iowa Department of Education (IDOE)	<i>Comprehensive Support and Improvement Plans</i> IDOE requires each LEA with a CSI school to complete the CSI Action Plan Table and Questions, respectively, which together	Within 60 business days of receiving this letter, IDOE must submit evidence that it:

	Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	make up the CSI plan. The CSI plan requires each LEA to select evidence-based interventions to address its needs, and to cite the data that indicates that need. To inform the development of the CSI plan, each LEA is required to conduct a local needs assessment, which includes the ESSA Resource Review Worksheet as described in section A. This worksheet serves as a mechanism for the LEA to consider staffing, instructional, funding, and other resource inequities across schools in the LEA and compared to the LEA as whole. Another required component of the needs assessment, the Self-Assessment of MTSS Implementation (SAMI), also provides the LEA and school a process for examining resource inequities (e.g., the infrastructure section). After conducting the needs assessment and completing the CSI plan, the LEA submits the plan for review and approval by the SEA. There are multiple parts of the CSI plan development process that encourage the LEA to identify resource inequities. As a whole, however, the State does not ensure that resource inequities are included in each CSI plan. Although IDOE describes the requirement to complete the resource review worksheet in several of its materials and checks for alignment between the needs assessment and the action plan during review, it does not require the use of the results of the resource review worksheet in order to identify resource inequities in the CSI plan. The two completed CSI plans IDOE submitted for this review do not clearly identify and address resource inequities or indicate any use of the resource review worksheet. Finally, while Section 3 of the CSI Action Plan template requires each LEA to select evidence-based interventions to address its overall needs, there is no defined component of the CSI plan review process or template that includes a requirement to identify resource inequities to be addressed through implementation of the plan. IDOE conducts monthly visits to monitor CSI schools, which includes reviewing and supporting the implementation of	- Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA has updated its templates for CSI plans, guidance, and monitoring protocol, as necessary). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that IDOE: - Update the CSI and ATSI plan templates to clearly connect the identification of a resource inequity with a strategy or evidence-based intervention that will address the resource inequity. For example, if the CSI plan indicates that there is a specific and measurable inequity in teacher experience levels in the CSI school compared to other non-identified schools in the LEA, the CSI plan may indicate that it will redirect current Teacher Leadership Compensation expenditures towards a particular set of topics for less experienced teachers. - Clearly describe in the CSI and ATSI plan guidance how to identify specific measurable resource inequities in the plans (e.g., based on the ESSA Resource Review Worksheet, 15 percent of teachers in the CSI school are operating with a conditional license or without proper endorsement as compared to 11 percent of teachers in the LEA and 7 percent of teachers in schools not identified).
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		interventions outlined in the CSI plan. IDOE’s monitoring protocol includes guiding questions related to addressing resource inequities in several critical areas, including equity and infrastructure. While IDOE may discuss addressing resource inequities during monitoring, it depends on local need; therefore, it is not sufficient for ensuring that each CSI plan identifies resource inequities to be addressed through implementation of the plan. <i>Additional Targeted Support and Improvement Plans</i> Similar to CSI plans, IDOE requires each ATSI school to complete a slightly modified Action Plan Table and Questions that together make up the ATSI plan. The same resource review worksheet and SAMI are used as part of the needs assessment to inform the development of the ATSI plan. The school improvement executive summary indicates that for ATSI schools, each ATSI plan must be approved by the school and LEA, submitted to the SEA, and monitored by the LEA. IDOE then monitors ATSI schools quarterly, which includes reviewing and supporting the implementation of interventions outlined in the Action Plan in the same manner as it does for CSI schools. Similar to CSI plans, IDOE does not have a defined process, either through monitoring or upon submission of the plan from the LEA, to ensure that each LEA reviews and approves a school’s ATSI plan for the requirement to identify and address resource inequities. While IDOE’s quarterly ATSI monitoring protocol may include discussion of resource inequities, it depends on school-specific need. Additionally, there is no component of the ATSI plan template that would allow IDOE to ensure that the LEA reviewed and approved for this specific requirement. <i>Other Technical Assistance and Support</i> IDOE partners with AEAs to support ESEA activities, including the development and implementation of CSI and ATSI plans. IDOE also facilitates regional training sessions and Summer	
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			Institutes to support CSI and ATSI schools, which includes sessions and resources related to resource inequities.	
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	North Carolina Department of Public Instruction (NCDPI)	As of June 2022, the North Carolina Department of Public Instruction (NCDPI) had not yet established a process for conducting resource allocation reviews of local educational agencies (LEAs) that serve a significant number of schools identified for comprehensive, targeted, or additional targeted support and improvement. NCDPI has established its process for identifying LEAs with a significant number of identified schools for purposes of its resource allocation review and provided a consolidated risk assessment that outlines its four-year monitoring schedule. NCDPI has several tools and processes that are related to a resource allocation review process (e.g., Annual Allotment Review, Consolidated Risk assessment, Consolidated Monitoring Assessment). In particular, NCDPI’s annual allotment review requires each LEA or public school unit (PSU) to demonstrate how it works with its identified schools in the financial decision-making process. NCDPI’s consolidated monitoring assessment requires PSUs to submit dated records and answer questions regarding how resources are being used at the LEA-level. NCDPI’s existing tools and processes do not result in a process that ensures resource allocations are reviewed. During our discussion, NCDPI indicated it planned to create and pilot a resource allocation review process. NCDPI plans to use its current processes (e.g., the ESSER Planning Guide) to develop a tool for conducting a resource allocation review. NCDPI’s ESSER Planning Guide includes guiding questions for LEAs to consider when developing ESSER II and ESSER III funding applications, including outlining strategic goals, how ESSER funds can be used to accomplish these goals, and how these funds work in coordination with other fund sources. Additionally, this planning guide asks LEAs to identify strategies funded through ESSER dollars and how these funds align with goals.	• Within 60 business days of receiving this letter, NCDPI must submit a plan and a timeline for implementing resource allocation reviews in the 2022-2023 school year consistent with the requirements in ESEA section 1111(d)(3)(A)(ii). • In accordance with the State’s plan submitted in response to the required action above, and no later than September 2023, NCDPI must submit evidence that it implemented this plan during the 2022-2023 school year (e.g., final procedures for reviewing resource allocation, sample documents from a completed resource allocation review with an LEA). <i>Recommendations</i> The Department recommends that as the SEA determines how it will review resource allocations, it pilots a process for the 2022-2023 school year that targets its efforts on the LEAs serving the greatest number of CSI, TSI, and ATSI schools and/or the greatest percentage of schools identified within the LEA. NCDPI may accomplish this by incorporating its risk assessment for monitoring into its resource allocation review process. By piloting this process with these LEAs, the SEA can refine its review procedures to best support school improvement in LEAs serving a “significant” number and/or percentage of CSI and TSI/ATSI schools, as the SEA deems appropriate.

2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	North Carolina Department of Public Instruction (NCDPI)	<i>Comprehensive Support and Improvement Plans</i> NCDPI uses a web-based system (NCStar), designed for LEA and/or school improvement teams, to inform, coach, sustain, track, and report improvement activities. Schools identified for CSI are required to use this system to complete their school improvement plans. Each school CSI plan must include strengths and areas identified for improvement, as determined in a school’s needs assessment, and identify transforming initiatives to be implemented in their schools. After conducting the needs assessment and completing the CSI plan, the plan is submitted for review and approval in NCDPI’s NCStar tool. CSI plans are publicly available for stakeholder feedback in the web-based system and the Comprehensive Continuous Improvement Plan, which is a tool that incorporates information from NCStar and the comprehensive needs assessment to help LEAs and their schools connect goals to budgeted activities using ESEA section 1003 school improvement funds. NCDPI monitors the implementation of school interventions outlined in a school’s CSI plan and provides feedback through a coaching function within the web-based system. The completed CSI plans NCDPI submitted following the review demonstrate how goals are expected to be achieved through strategic intervention. Although the CSI plans identify a correlation between a school’s needs assessment and the strategies to be implemented to address the overall goals identified in the plans, the completed CSI plans submitted by NCDPI do not identify the resource inequities to be addressed by implementation of the plan. <i>Additional Targeted Support and Improvement Plans</i> NCDPI requires its ATSI schools to use its web-based system to develop and implement their ATSI plans. All ATSI plans are required to be approved by an LEA’s school board before review by NCDPI. NCDPI’s consolidated monitoring instrument includes a section on CSI and ATSI plans. However, the monitoring instrument does not request evidence from an LEA about how it identifies or	Within 60 business days of receiving this letter, NCDPI must submit evidence that it: - Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA’s processes for reviewing CSI plans using its web-based system check for identified resource inequities to be addressed through the plan). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that NCDPI: - Clearly describe in the CSI and ATSI plan templates how to identify specific measurable resource inequities in the plan (e.g., based on staff survey data, 40 percent of teachers in the CSI school report having too few instructional resources, as compared to 28 percent of teachers in the LEA and 19 percent of teachers in schools not identified). - Update CSI and ATSI templates to clearly connect the identification of a resource inequity with a strategy or evidence-based intervention that will address the resource inequity. For example, if the CSI plan indicates that there is a specific and measurable inequity in teacher experience levels in the CSI school compared to other non-identified schools in the LEA, the CSI plan might include professional development tailored to less experienced teachers.
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			addresses resource inequities in ATSI plans. NCDPI’s web-based system allows LEAs to provide feedback to its schools and identify any corrective actions that need to be implemented, but this process does not directly relate to how the LEAs review and approve a school’s ATSI plan to meet the specific requirement to identify resource inequities to be addressed through implementation of the plan, as outlined in ESEA section 1111(d)(2)(C).	
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	Rhode Island Department of Education (RIDE)	The Rhode Island Department of Education (RIDE) is currently piloting a resource allocation review (RAR) process with nine local educational agencies (LEAs), which serve a majority of the schools identified for comprehensive support and improvement (CSI) in the State. During this pilot process, RIDE asks participating LEAs to engage in a reflective process regarding the equity and effectiveness of their resource allocations for the Elementary and Secondary School Emergency Relief (ESSER) funds. This pilot RAR process is integrated into a broader effort in the State to provide additional supports over a two-year period to LEAs that were disproportionately impacted by COVID-19. At the time of the Department’s desk review, RIDE had not yet completed its pilot resource allocation review. While RIDE is piloting this initial process, it is also developing a new platform called the Rhode Island Strategic Planning System (SPS) that the State educational agency (SEA) will use to conduct resource allocation reviews in the future. The SPS will be connected with the State’s finance system and allow tracking by initiative through uniform account codes to determine what financial resources are being utilized for different purposes. The SPS will allow State-level users to track how LEAs and schools are spending funds towards specific initiatives across the State. LEA-level users will be able to track the same information across its schools. Every LEA in the State will be required to use the SPS and submit strategic plans through that platform annually, including connecting initiatives to the LEA’s budget for Federal, State, and local funds.	After RIDE has finished conducting its pilot resource allocation reviews, the SEA must submit evidence of the resource allocation review it conducted in the LEAs identified by the SEA as serving a significant number of CSI, TSI, or ATSI schools (e.g., final procedures for reviewing resource allocation, sample documents from a complete resource allocation review with an LEA). <i>Recommendations</i> The Department recommends that RIDE: • Establish a methodology to identify LEAs with a significant number and/or percentage of schools identified for TSI or ATSI for including these LEAs in RIDE’s RAR process. Currently, RIDE focuses its RAR on LEAs with CSI schools and does not explicitly include LEAs serving a significant number of schools identified for TSI and ATSI. The SEA likely includes these LEAs in its resource allocation review already, as LEAs that serve a significant number of CSI schools also serve TSI and ATSI schools. Given the SEA’s concerns about SEA staff capacity to conduct these resource allocation reviews in the future, it may consider setting a higher threshold for LEAs serving TSI and ATSI schools than it uses currently for LEAs with CSI schools. • Determine how it will review and meaningfully engage with LEAs to periodically conduct RARs in the future. As described in the summary, the State’s future plans to conduct a RAR would require LEAs with a significant number of identified schools to complete a protocol and submit it through the SPS system. The SEA expressed concerns over staff

			RIDE will require all LEAs with CSI schools to annually reflect on the effectiveness and equity of resource allocation using a required protocol as a component of the LEA’s strategic plan submitted in SPS. The SEA’s current protocol includes a series of retrospective questions and prospective questions that are embedded in the Federal Consolidated Resource Plan application as optional for all LEAs and required for LEAs with CSI schools. RIDE will use the lessons learned from the pilot RAR process to refine this protocol and expand the definition of resources beyond ESSER to include other Federal funds. RIDE also intends to examine other resources, such as non-Federal funds and personnel, in its RAR process in the future. RIDE noted that, although it will have access to all of this information in SPS, it has limited staff capacity to review the information submitted by LEAs serving a significant number of CSI schools. The SEA is still determining how it will review LEA submissions using this RAR protocol in the future and the remaining steps in this process (e.g., communicating or publishing results to LEAs, schools, or the public, technical assistance to provide to LEAs or schools, continuous improvement to its RAR process). RIDE is currently connecting its procedures for conducting RAR in the future with its other school improvement efforts. Within RIDE’s SPS, every school in the State will be required to have a school support and improvement plan (not just schools that are identified for CSI, targeted support and improvement (TSI), or additional targeted support and improvement (ATSI)). The SPS will also house a repository of example documentation. Although the platform will not be publicly available, the strategic plans will all be public in the future.	capacity to be able to review the completed protocols submitted through SPS. Please note that if the SEA were to only have the LEAs submit completed resource allocation reviews using the SEA-provided protocol, the completion of that review by the LEA alone and submission to the SEA without any review of the submitted information by the SEA would not meet the requirement for the SEA itself to periodically review resource allocations. The SEA must have a process to review resource allocations to support school improvement. Consider using a broader definition of resources that encompasses more than funding and more than Federal funding (e.g., State, or local funds, staffing resources and considerations) for purposes of its resource allocation review process.
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School	Rhode Island Department of Education (RIDE)	<i>Comprehensive Support and Improvement Plans</i> RIDE requires that CSI plans be developed using a clear, step-by-step process that consists of four sequential modules. After each module is completed, the LEA submits at least one deliverable to	Within 60 business days of receiving this letter, RIDE must submit evidence that it: Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of

	Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	the SEA for review and feedback. The modules are well-documented in RIDE’s guidance, entitled the Rhode Island Practitioners’ Guide to School Improvement, and other associated guidance documents that are publicly available. During Module 1: Introducing Rhode Island’s school improvement framework and assembling the team, the LEA and CSI school establish the Community Advisory Board (CAB), which is composed of family members, students, other community stakeholders served by the identified school. The CAB, in partnership with a school-based team composed of teachers, school partners, staff, and administration in the CSI school, are responsible for developing, implementing, and monitoring the CSI plan. As indicated in its approved ESEA consolidated State plan, RIDE requires a CAB to be created for each LEA with CSI schools. Rhode Island’s use of CABs and school-based teams for each CSI school ensures that CSI plans are developed and implemented in that partnership with stakeholders (including principals and other school leaders, teachers, and parents). Module 2 is focused on conducting a needs assessment and root cause analysis. RIDE’s guidance on conducting the needs assessment and example submitted deliverables for CSI plans demonstrate that the needs assessment is primarily focused on analyzing student outcomes using data available on local report cards. RIDE’s root cause analysis protocol indicates the CAB and school-based team should prioritize needs and examine additional data sources in order to determine a final root cause that will appear in the final CSI plan. These additional data sources may include information on resources (e.g., financial, curricular quality, hiring and recruitment, staffing, teacher retention, alignment of time/money to stated priorities, and other data sources). These deliverables in Module 2 directly inform evidence-based interventions selected in Module 3: Identifying and selecting evidence-based interventions and the final CSI plan that is developed in Module 4: Comprehensive support and	the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA has updated its review procedures or deliverable templates for CSI plans and/or guidance to address the requirements in ESEA section 1111(d)(1)(B)(iv)). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that RIDE: - Clearly describe in the CSI and ATSI plans and associated guidance (e.g., deliverable templates, Rhode Island Practitioners’ Guide to School Improvement, related deliverable templates) how to identify specific, measurable resource inequities in the plan. For example, RIDE could include additional guidance or instruction in its root cause analysis protocol on how to identify and measure resource inequities and update the description appearing in the “Root Cause Analysis” portion of the tables for each intervention in the CSI plans to clearly note this is where to identify resource inequities. For another example, RIDE could add a separate “Resource Inequity” section to the tables for each intervention in the CSI plans that appears after the “Root Cause Analysis” portion and, in the description for this new section, RIDE could clearly describe the ESEA requirement and note that although this may not be applicable depending on the intervention, the CSI plan must describe resource inequities somewhere. - Update the CSI and ATSI plan templates to clearly connect the identification of a resource inequity with a strategy or
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		improvement plans and applications for ESEA section 1003 school improvement funds. Although the root cause analysis may result in a CSI plan identifying a resource inequity to be addressed through a particular intervention, none of RIDE’s detailed guidance or templates indicate that a CSI plan is required to identify resource inequities, which may include a review of LEA and school-level budgeting, to be addressed through implementation of the plan. Furthermore, RIDE’s review procedures did not demonstrate that the SEA ensures each CSI plan that it approves identifies and addresses resource inequities. Accordingly, some but not all of the sample CSI plans identify general resource inequities to be addressed through the plan. For example, one CSI plan generally described that teachers need more training, support, and additional compensation on social and emotional learning (SEL) systems of support for behavioral health and its plans to implement an intervention on after school support/SEL systems of support for behavioral health for at-risk students. During the desk review, the SEA indicated that it plans to add an embedded element in the future strategic planning system where the LEAs with CSI plans must reflect on past spending, areas of strength and weakness, future spending, and goals. Currently, RIDE annually monitors all CSI schools. RIDE’s monitoring protocol includes five key questions that are asked of all schools. Of the five key questions, at least one is generally related to addressing resource inequities. Specifically, in Criterion 1.1, which is part of Question 1, the SEA’s protocol asks about the alignment of operational systems and processes with the CSI plan. It looks at how “School leaders target resources (e.g., funding, materials, time, staff) toward the school's CSIP; treat resources flexibly; and avoid scattered allocations of resources for improvement.”	evidence-based intervention that will address the resource inequity. The examples described above are also examples RIDE may consider for this recommendation because each would result in resource inequities being directly associated with an intervention in the plan.
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			<i>Additional Targeted Support and Improvement Plans</i> RIDE indicated that all of the resource documents and templates that are made available to CSI schools on developing support and improvement plans are also made available to ATSI schools for developing ATSI plans. However, the SEA does not currently have a process (e.g., through a monitoring protocol) to ensure that LEAs and the ATSI schools that they serve are meeting the requirements in ESEA section 1111(d)(2)(C).	
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	South Carolina Department of Education (SCDE)	The South Carolina Department of Education (SCDE) does not currently have a process for conducting resource allocation reviews and is currently developing a plan for conducting a resource allocation review every three years, with its first review in fall 2022. SCDE has not yet determined which local educational agencies (LEAs) have a “significant” number of identified schools for purposes of the resource allocation review, or which resources it will include. Once it adopts a process for determining which LEAs it will include, SCDE will develop its protocol and request public comment. Although SCDE is still developing its resource allocation review process, it is planning to: • Integrate data sources such as its Federal consolidated monitoring tool, report cards, and per pupil expenditure report; • Include a variety of funding streams, as well as other non-fiscal resources; • Compare resources within a single LEA, rather than across different LEAs; • Analyze student outcomes from report cards in order to examine the correlation between outcomes and resource inequities; and • Send each participating LEA its findings in a report with data visualizations and host a resource allocation review conference with each participating LEA. SCDE contracts with a third party to conduct an accreditation process and diagnostic reviews for schools identified for comprehensive support and improvement (CSI). These processes	Within 60 business days of receipt of this letter, SCDE must submit a plan and a timeline for implementing resource allocation reviews in the 2022-2023 school year consistent with the requirements in ESEA section 1111(d)(3)(A)(ii), including determining which LEAs serve a significant number of CSI schools and schools implementing targeted support and improvement plans (i.e., TSI and ATSI schools). In accordance with the State’s plan submitted in response to the required action above, and no later than September 2023, evidence that it implemented this plan during the 2022-2023 school year (e.g., final procedures for reviewing resource allocation, sample documents from a complete resource allocation review with an LEA). <i>Recommendations</i> The Department recommends that as SCDE determines how it will review resource allocations, it pilot a process for the 2022-2023 school year that targets its efforts on the LEAs serving the greatest number of CSI and TSI/ATSI schools and/or the greatest percentage of schools identified within the LEA. By piloting this process with these LEAs, the SEA can refine its review procedures to best support school improvement in LEAs serving a “significant” number and/or percentage of CSI and TSI/ATSI schools, as the SEA deems appropriate.

			provide information about and analyze several different resources (although they do not appear to make any comparisons to demonstrate inequities), including a resource capacity domain in the diagnostic review. The resource capacity domain examines strategic resource management and the utilization of resources to support professional learning and staff recruitment and retention. SCDE has not yet determined which local educational agencies (LEAs) have a “significant” number of identified schools for purposes of the resource allocation review, or which resources it will include.	
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	South Carolina Department of Education (SCDE)	<i>Comprehensive Support and Improvement Plans</i> SCDE requires that CSI plans identify evidence-based interventions or strategies, including a narrative describing how allocated funds are being implemented in a CSI school. SCDE provided two completed CSI plans for this review; while the plans included general evidence-based interventions, they did not identify the resource inequities to be addressed through implementation of the plan. Additionally, although the plans identified resources that will be used to support evidence-based interventions, this is not sufficient to meet the requirement that the CSI plan identify resource inequities in the school. SCDE conducts both consolidated monitoring and separate progress monitoring of CSI plans to ensure LEAs and schools are using funds appropriately. However, there is limited information in its monitoring processes to ensure CSI plans identify and address resource inequities. SCDE provided its consolidated monitoring protocol for this review, which includes a checklist to ensure schools are meeting the requirements in section 1111(d)(1)(B)(iv) of the ESEA, but SCDE noted during the review that the checklist in its monitoring protocol does not ensure that resource inequities are included in each CSI plan.	Within 60 business days of receipt of this letter, SCDE must submit evidence that it: - Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with ESEA section 1111(d)(1)(B)(iv) (e.g., evidence that the SEA has updated its deliverable templates for CSI plans, guidance, and monitoring protocol, as necessary). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans, including that the LEA ensures that the ATSI plan identifies and addresses resource inequities (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Department recommends that SCDE: - Update CSI and ATSI templates to clearly connect the identification of a resource inequity with a strategy or evidence-based intervention that will address the resource inequity. For example, if the CSI plan indicates that there is a specific and measurable inequity in teacher experience levels in the CSI school compared to other non-identified schools in the LEA, the CSI plan may indicate that it will redirect current professional development expenditures towards a particular set of topics for less experienced teachers.

			<i>Additional Targeted Support and Improvement Plans</i> SCDE stated that ATSI plans are reviewed and approved by the LEA. However, SCDE indicated that it does not currently have a process to ensure that LEAs and the ATSI schools that they serve are meeting the requirements in section 1111(d)(2)(C) of the ESEA for support and improvement plans.	Clearly describe in the CSI and ATSI plan guidance how to identify specific measurable resource inequities in the plans (e.g., based on staff survey data, 40 percent of teachers in the CSI school report having too few instructional resources, as compared to 28 percent of teachers in the LEA and 19 percent of teachers in schools not identified).
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	Utah State Board of Education (USBE)	As of June 2022, the Utah State Board of Education (USBE) is currently developing its process for conducting resource allocation reviews of local educational agencies (LEAs) that serve a significant number of identified schools. USBE stated that the plan for conducting resource allocation reviews will include a pilot of its resource allocation review process in spring 2023 with full implementation to begin in school year 2023-2024. Although USBE indicated that it has established criteria to determine which LEAs have a significant number of identified schools for purposes of the resource allocation review, it has not yet determined which LEAs have met such criteria. USBE indicated that it plans to conduct its resource allocation reviews every three years to align with its comprehensive support and improvement (CSI) identification cycle. As it develops its resource allocation reviews process, USBE is working closely with Region 15 of the Department’s Comprehensive Centers program. USBE also noted that it plans to consider several different types of resources when conducting its resource allocation reviews in the future, such as staffing, instructional, and physical resources. In the development of its pilot resource allocation review process, USBE consulted external groups, such as WestEd and other stakeholders. USBE intends to consult with community stakeholders, including families and students from underserved communities, in fall 2022. USBE indicated that it will develop a post-review process that addresses resource inequities that are identified in each LEA serving a significant number of CSI, targeted, or additional targeted support and improvement (TSI and ATSI respectively) schools during its	Within 60 business days of receiving this letter, USBE must submit a plan and a timeline for implementing its pilot resource allocation reviews in the 2022-2023 school year consistent with the requirements in ESEA section 1111(d)(3)(A)(ii). In accordance with the State’s plan submitted in response to the required action above, and no later than September 2023, USBE must submit evidence that it implemented this plan during the 2022-2023 school year (e.g., final procedures for reviewing resource allocation, sample documents from a completed resource allocation review with an LEA).

			resource allocation reviews, including any timelines to address those inequities.	
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans Elementary and Secondary Education Act (ESEA) § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	Utah State Board of Education (USBE)	<i>Comprehensive Support and Improvement Plans</i> In Utah, each school identified for CSI must convene a school leadership team (SLT) consisting of members such as the school principal, faculty, at least one parent, a representative from the LEA, and additional members as needed. USBE’s system of support team assists the SLT in developing the School Improvement Plan (SIP) based on a needs assessment and root cause analysis. The LEA submits the SIP to USBE, which convenes a panel that reviews and approves the plan. USBE provided the State’s System Support for School Improvement Handbook (Handbook) that includes numerous templates for each step of the SIP process (e.g., conducting a needs assessment, identifying root causes, developing priorities and indicators, identifying data sources, selecting evidence-based practices, and establishing baseline performance data and annual targets). In two sample CSI plans provided to the Department for this review, each school identified resource inequities within the root cause analysis section based on the needs assessment. However, neither the SIP template nor the Handbook specifically require resource inequities to be identified or addressed in the plan. Additionally, the State’s review rubric does not explicitly review each submitted plan to ensure that it includes identification of resource inequities or that the activities within the plan address those inequities. <i>Additional Targeted Support and Improvement Plans</i> During the desk review discussion, it became evident that USBE has not required schools identified for ATSI to complete an ATSI plan consistent the requirements of ESEA section 1111(d)(2)(C). USBE reported that it does not differentiate identification between schools identified for targeted support and improvement based on consistently underperforming subgroups (TSI) or ATSI. All schools identified for TSI complete the SIP using the same process	Within 60 business days of receiving this letter, USBE must submit evidence that it: - Ensures each CSI plan meets the requirement to identify resource inequities to be addressed through implementation of the plan consistent with the requirements in ESEA section 1111(d)(1)(B)(iv) (e.g., revised guidance, SIP template, CSI plan review process, and/or monitoring protocol that require a description in the plan template of resource inequities identified as part of its needs assessment and root cause analysis). - Ensures each LEA reviews, approves, and monitors the implementation of ATSI plans consistent with the requirements in ESEA section 1111(d)(2)(C), including that the LEA ensures that the ATSI plan identifies resource inequities to be addressed in the plan (e.g., evidence that the SEA has provided updated guidance to LEAs and updated the State’s monitoring protocol to include the requirements in ESEA section 1111(d)(2)(C)). <i>Recommendations</i> The Handbook includes numerous templates for each step of the SIP process (e.g., needs assessment, root causes, priorities, indicators, data sources, baseline performance data, evidence-based practices, and annual targets). However, it does not appear to include information on coordinating with other State or local programs. To minimize overlap or duplication of efforts, the Department recommends USBE revise the Handbook and relevant SIP template to include a description of how the school coordinated with other agencies or programs in the development of the CSI or ATSI plan.

			described above for CSI plans. At the time of this review, the State did not require schools identified for ATSI to complete a plan that meets requirements, nor did it ensure that LEAs met responsibilities to develop and implement ATSI plans. <i>Other Technical Assistance and Support</i> USBE partners with the Department’s Region 15 Comprehensive Center to support its work on identification and addressing resource inequities in CSI plans.	
2022 – Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(c)(4)(C)(iii), 1111(d)(2)(C)-(D), and 1111(d)(3)(A)(i)(II)	Nebraska Department of Education (NDE)	ESEA section 1111(d)(2)(C) requires the State to identify, for Targeted Support and Improvement – Additional Targeted Support (ATSI), any school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D). NDE provided its business rules that indicated the State sets the cut score for identifying ATSI schools by averaging the score of all schools identified as the lowest-performing Title I schools identified for comprehensive support and improvement (CSI-Low Performing) for each indicator. Using the average score of all CSI-Low Performing schools on each indicator does not capture all schools in which any subgroup of students, on its own, would be identified for CSI-Low Performing. Accordingly, NDE did not identify ATSI schools consistent with ESEA requirements in fall 2019 based on data from school year 2018-2019. Subsequent to the review but prior to the release of this report, NDE submitted an amendment request to its consolidated State plan to provide more detail regarding its procedures for identifying ATSI schools consistent with ESEA requirements (i.e., clarifying that the cut scores for each indicator represent the highest-performing CSI-Low Performing school).	Within 60 business days of issuing the final report, USED required NDE to: - Revise its business rules so that its methodology for identifying schools for ATSI includes any school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (i.e., set the cut scores for each indicator so that the cut scores represent the highest-performing CSI-Low Performing school). After NDE identified schools for ATSI in fall 2022, USED required NDE to - Identify schools for ATSI consistent with ESEA section 1111(d)(2)(C) (i.e., setting the ATSI cut scores for each indicator using the highest scores of those schools identified for CSI-Low Performing for each indicator) as soon as possible, but no later than October 31, 2022, based on data from the 2021-2022 school year. If NDE fails to meet this requirement, the Department may take additional enforcement action.
2022 – Consolidated	Support for School Improvement ESEA §	Nebraska Department of Education (NDE)	NDE provided its monitoring protocol and a monitoring sample from an LEA with a TSI school. The monitoring protocol requires a description of LEA supports for TSI and ATSI schools. However, although NDE submitted a sample monitoring response	Within 60 days, NDE must provide: Evidence that it ensures each LEA reviews, approves, and monitors implementation of TSI and ATSI plans (e.g., changes to its monitoring protocol and its guidance materials); and

	1111(d)(1)-(2), and 1111(d)(3)(A)		from an LEA with relatively robust information, there is no specific requirement in the monitoring protocol that ensures each LEA reviews, approves, and monitors implementation of TSI and ATSI plans. Both LEAs also indicated during the desk review that they would benefit from additional support and clarity from NDE regarding TSI and ATSI plans. ESEA section 1111(d)(3)(A)(ii) requires the SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. While NDE provides technical assistance to all identified schools and supports LEAs in their own resource inequity review as required during the development of CSI and ATSI plans, the SEA itself has not periodically reviewed resource allocation to support school improvement in each LEA in the State serving a significant number of schools identified for CSI, TSI, and ATSI.	2. A timeline and plan for conducting resource allocation reviews in each LEA serving a significant number of CSI, TSI, or ATSI schools in the 2022-2023 school year. After NDE has conducted its resource allocation reviews during the 2022-2023 school year, NDE must provide evidence of the review conducted in LEAs serving a significant number of CSI, TSI, or ATSI schools. <i>Recommendations</i> While NDE has an FAQ document that includes the requirements in ESEA section 1111(d)(2)(B) for support and improvement plans for TSI and ATSI schools, its planning guide does not mention these requirements. Both LEAs that participated in this review indicated that they would like additional support in this area from NDE. The Department recommends that NDE update its planning guide to clearly include these requirements and ensure that the existing template clearly describes the specific TSI and ATSI plan requirements.
2022 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Nebraska Department of Education (NDE)	Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will: 1. Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if applicable; 3. Monitor schools receiving funds; 4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans.	Within 60 days of receiving this report, NDE must submit a revised LEA application for section 1003 school improvement funds that requires each LEA to describe how it will: 1. Monitor schools receiving funds under the section; 2. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 3. Align other Federal, State, and local resources to carry out the activities supported with these funds; and 4. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of support and improvement plans. <i>Recommendations</i> The Department recommends that NDE examines its listed assurances and remove any that are not applicable to the programs covered in this application.

			NDE’s application template includes checkboxes for the LEA to ensure that it will monitor schools receiving section 1003 funds and that the LEA will use a rigorous review process to recruit, screen, select, and evaluate any external partners with which the LEA will partner. However, the application must require each LEA to describe how it will carry out each of the responsibilities; therefore, assurances are insufficient. Additionally, NDE did not require in its application each LEA to describe how it will align other Federal, State, and local resources to carry out the activities supported with funds, and, as appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans.	
2022 – Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(c)(4)(C)(iii), 1111(d)(2)(C)-(D), 1111(d)(3)(A)(i)(II)	Ohio Department of Education (ODE)	ESEA sections 1111(c)(4)(C) and 1111(d)(2)(C-D) require the State annually meaningfully differentiate all public schools and identify schools for comprehensive support and improvement (CSI), targeted support and improvement (TSI) (i.e., schools with one or more consistently underperforming subgroups), and additional targeted support and improvement (ATSI). During the monitoring review, the Department received conflicting information from the SEA regarding the identification of TSI and ATSI schools. Specifically, the SEA’s website and guidance notes that “all Title I-eligible schools” are included in the process for identification of TSI and ATSI schools. The ESEA requires, however, that TSI and ATSI schools must be identified from all public schools (Title I-eligible and non-Title I-eligible). ODE’s guidance and website also state that TSI schools will be identified every three (3) years following the 2018 identification. ESEA section 1111(c)(4)(C)(iii) requires that TSI schools are identified annually. Additionally, the State’s ESEA consolidated State plan labels ATSI schools as “Focus with Additional Targeted Support;” however, the State website and guidance do not include this category. Instead, the guidance and website refer to ATSI schools as “Warning schools.” The Warning schools category is not included in the ODE’s approved ESEA consolidated State plan.	Within 60 business days of receiving this report, ODE must submit to the Department evidence that: • ODE’s website and guidance has been updated to reflect what is in the approved ESEA consolidated State plan and consistent with ESEA requirements. • ODE identified TSI and ATSI schools from among all public schools in fall 2019 based on data from the 2018-2019 school year. If ODE is unable to provide this evidence within 60 business days, ODE must provide evidence that it identified TSI and ATSI schools consistent with ESEA section 1111(d)(2)(A) and (C) and the State’s approved ESEA consolidated State plan in fall 2022 as soon as possible, but no later than October 31, 2022, using data from the 2021-2022 school year. If ODE fails to meet this requirement, the Department may take additional enforcement action.

			While the SEA noted during monitoring conversations that the guidance and website were inaccurate and identification of CSI, TSI, and ATSI schools was conducted consistent with the approved methods within the State’s ESEA consolidated State plan, it did not provide evidence supporting this statement. As a result, the Department was unable to determine if ODE met requirements for identifying TSI and ATSI schools.	
2022 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), 1111(d)(3)(A)	Ohio Department of Education (ODE)	ESEA section 1111(d)(1)(B)((4) and (d)(2)(C) requires each school identified for CSI and ATSI to develop a plan that identifies resource inequities to be addressed through implementation of the plan. ODE provided the fiscal year (FY) 2022 One Needs Assessment (ONA) Trigger Questions for schools and LEAs. Questions 15-17 of the Leadership, Administration, and Governance section within the trigger questions, require CSI, TSI, and ATSI schools to describe the resources needed to improve students’ academic success. During its annual review process, the ODE Office for Improvement and Innovation (OII) reviews the LEA and school plan to ensure that the “plan identifies resource inequities, which may include a review of local educational agency and school-level budgeting. Resource equity refers to the allocation and use of resources (people, time, and money) to create student experiences that enable all children to reach empowering and rigorous learning outcomes.” However, neither the ONA Trigger Questions nor the consolidated application appear to require CSI and ATSI schools to address resource inequities within the CSI or ATSI plan. ESEA section 1111(d)(2)(B)(i) requires that each school identified for TSI must develop a TSI plan that is informed by all indicators in the State’s accountability system including student performance against long-term goals. During the review, ODE stated that the indicators in the ESEA consolidated State plan are aligned to the ONA Trigger Questions. Upon review of the FY 2022 ONA Trigger Questions, it is not evident that the ONA includes all indicators for each identified subgroup. For example, ODE	Within 60 business days of receiving this report, ODE must submit to the Department: • Evidence that the support and improvement plan template for CSI and ATSI schools includes the requirement to identify resource inequities to be addressed through implementation of that plan. • Evidence that the TSI support and improvement plan template is informed by all accountability indicators (Academic Achievement, Other Academic indicator for elementary and secondary schools that are not high schools, Graduation Rate, Progress on ELP, and SQSS) and includes consideration of all identified subgroups. • Evidence of guidance about including meaningful stakeholder involvement in the development of all areas of CSI, TSI, and ATSI plans, and a description of how ODE will monitor for implementation of stakeholder involvement – either in the plan approval process for CSI plans or within the SEA’s plan for monitoring LEAs. • A final timeline and a plan, that includes implementation in the 2022-2023 school year, for implementation of resource allocation reviews in each LEA serving a significant number of CSI, TSI, or ATSI schools. <i>Recommendations</i> The Department recommends that ODE revise the final school improvement plan template to include all required components of a CSI, TSI, or ATSI plan.

			requires TSI schools to report areas of reading achievement where students are not proficient (ONA section: Curriculum Instruction and Assessment – Content Areas question 6). The question provides possible data sources to consider including the reading/language arts summative assessment, language and literacy portion of the kindergarten readiness assessment, reading diagnostic assessments, and early learning assessment and screeners. To meet the requirement to address the Academic Achievement Indicator, TSI schools must explicitly consider the SEA summative assessments in reading/language arts and mathematics. Additionally, it does not appear that the ONA Trigger Questions require the identified school to consider all identified subgroups when responding to questions aligned with indicators. For example, ODE includes student growth as an Other Academic indicator, but the trigger questions about growth data are only required for CSI schools and for TSI schools identified for the students with disabilities subgroup, rather than all identified subgroups in every TSI school. Finally, it is not evident how the ONA Trigger Questions require TSI plans to include consideration of every School Quality or Student Success (SQSS) indicator for each identified subgroup. ESEA sections 1111(d)(1)(B) and 1111(d)(2)(B) requires that each school identified for CSI, TSI, or ATSI develop a support and improvement plan in partnership with stakeholders (including principals and other school leaders, teachers and parents). ODE described a process for reviewing CSI plans that included checking to ensure stakeholder involvement in the development of the plan. The Department could not corroborate that the identified school and LEA responses to ONA Trigger Questions were shared with stakeholders to inform the development of the plan. ODE described the ONA Trigger Questions as aligning with accountability indicators; therefore, stakeholders must have the opportunity to provide meaningful input on all components of the CSI, TSI, or ATSI plan, not just the priorities, goals, and strategies after the indicators have been considered.	
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			ESEA section 1111(d)(3)(A)(ii) requires the SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. ODE provided a contract proposal and draft plan for strategic resource allocation reviews in the State. The SEA described its plan to pilot a resource allocation review process with 10 LEAs and train individuals on District Leadership Teams (DLT), Education Service Center Technical Assistance teams (ESC), and State Support Teams (SST) to conduct resource allocation reviews. ODE explained that the SST and ESC will coach a subset of LEAs through the resource allocation review process. In submitted documentation and monitoring discussions, ODE clarified that the SEA has supported two (2) LEAs on conducting resource allocation review and that the plan and timeline for incorporating resource allocation review into the ONA for all LEAs is not final. The SEA did not provide a final protocol or timeline for how it will review resource allocation to support each LEA serving a significant number of schools identified for CSI or TSI.	
2022 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Ohio Department of Education (ODE)	Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will: 1. Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if applicable; 3. Monitor schools receiving funds; 4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans.	Within 60 business days of receiving this report, ODE must submit to the Department: • An updated SQIG application that meets the requirements of ESEA section 1003(e), including a description of how the LEA will use a rigorous review process to recruit, screen, select, and 24 evaluate any external partners with which the LEA will partner in carrying out activities supported with school improvement funds. • Revised SSI guidance and application template that includes all application requirements in ESEA section 1003(e).

			The application must also include an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would have received in the absence of ESEA section 1003 funds. ODE’s LEA application for School Quality Improvement Grants (SQIG) did not include a description of how the LEA will use a rigorous review process to recruit, screen, select, and evaluate any external partners with which the LEA will partner in carrying out activities supported with school improvement funds. ODE also provided its guidance document for allocating supplemental section 1003 funds through the Title I Non-Competitive, Supplemental School Improvement (SSI) formula grant program. This document states that only CSI, TSI, and ATSI schools that have not received an SQIG award are eligible for SSI. Each LEA that accepts SSI funds signs a set of assurances and submits a budget and budget details through the CCIP; however, it is not evident that these LEAs submit an application that meets the requirements in ESEA section 1003(e).	
2022 – Targeted	State Educational Agency Review of Resource Allocation ESEA § 1111(d)(3)(A)(ii)	Massachusetts Department of Elementary and Secondary Education (DESE)	The Massachusetts Department of Elementary and Secondary Education (DESE) piloted a resource allocation review process in fall 2019 with one local educational agency (LEA), Boston Public Schools. Boston Public Schools served 20 identified schools in the 2019-2020 school year and met the State determined definition for serving a significant number of identified schools of 10 or more schools identified as comprehensive and additional targeted support and improvement (CSI and ATSI respectively). DESE incorporates the resource allocation reviews into an existing, annual monitoring process called District Reviews. State legislation created the District Review process and the Office of School and District Accountability in 2008 (Mass. Gen. Laws. c. 15, § 55A). DESE reports that it monitors approximately 10-20 LEAs annually which are selected based on a risk rating that accounts for school performance but does not explicitly include the number or percentage of schools identified for support and	<i>Recommendations</i> In its self-assessment, DESE shared that an LEA with 10 or more identified schools serves a “significant” number of identified schools. During the desk review, DESE clarified that the current definition of 10 or more identified schools is a starting point to pilot this process and that all LEAs included in a comprehensive District Review undergo a resource allocation review. The Department recommends that the SEA align its method for determining which LEAs serve a “significant” number of CSI and ATSI schools to its methodology for selecting LEAs for comprehensive District Reviews and consider updates to the risk rating process to include the consideration of LEAs serving the greatest number and/or percentage of schools identified explicitly to select LEAs for comprehensive District Reviews.

			improvement. District Reviews monitor LEA performance against six standards and related indicators. There are two types of District Reviews, comprehensive and targeted. DESE reviews for evidence on all six standards for a comprehensive review while DESE selects a subset of standards based on LEA needs in a targeted review. Several of the standards include required evidence, called indicators, related to the periodic review of resource allocation to support school improvement. The review of Boston Public Schools District included funding sources (e.g. district allocation process including federal, State and local funds), staffing resources (e.g., allocation of staff and educator equity data), staffing considerations (e.g., professional development, turnover and retention), instructional resources, physical resources (e.g., access to safe and adequate facilities), and other resources (e.g., school schedules, allocation of time for common planning or data analysis). The review also required evidence that the LEA budget documents “include information about allocation of resources (money, people, and time) and about all sources of funds, including local revolving funds and grants.” DESE provides a number of analytical tools to LEAs selected for District Reviews. For example, DESE shares the Resource Allocation and District Action Reports (RADAR), an analysis tool the SEA prepares to conduct comparisons across LEAs using a feature to “select comparable districts,” to visualize longitudinal trends in spending, staffing, enrollment, and student performance, and to investigate staffing levels or per pupil spending. Additionally, the SEA’s resource allocation review looks broadly at the resources across schools within the district (although it does not identify specific schools in the report). During the desk review, DESE also shared that the comprehensive District Review focuses on analysis which compares high to low performing schools within a LEA.	
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			After a District Review, DESE shares a report with the LEA, provides the opportunity for LEAs to discuss the report results individually with the SEA, and posts each District Review report publicly on the DESE website. In certain select cases, such as with Boston Public Schools, DESE enters into a memorandum of understanding with the monitored LEA around priority areas identified during the District Review.	
2022 – Targeted	Identifying and Addressing Resource Inequities in Comprehensive School Improvement and Additional Targeted School Improvement Plans ESEA § 1111(d)(1)(B)(iv) and 1111(d)(2)(C)	Massachusetts Department of Elementary and Secondary Education (DESE)	<i>Comprehensive Support and Improvement Plans</i> Schools identified for CSI under Massachusetts’ Next-Generation District & School Accountability System must complete a Sustainable Improvement Plan (SIP) which the LEA submits to DESE’s office of Statewide System of Support (SSoS) on behalf of the identified school. SSoS reviews each plan and provides feedback to the LEA and school to ensure the approved plan meets all ESEA requirements. DESE’s guidance states that CSI plans must identify resource inequities to be addressed through implementation of the plan in the Analysis of Assets and Challenges and the District Systems sections. In these sections, the CSI school must analyze existing school and LEA systems, resources, policies, programs, and practices to identify gaps. The CSI plan must then identify root causes and align selected interventions to the identified gaps, root causes, and turnaround practices. The District Systems section of the plan requires the LEA to describe how the district uses equitable resource allocation to support the turnaround initiatives in the CSI plan. DESE offers its LEAs extensive resources on identifying and addressing resource inequities. The District Systems section of DESE’s website includes a subsection for “Equitable Resource Allocation and Resource Plan for the School.” This guidance notes that low-performing schools must identify resource inequities to be addressed through implementation of a SIP. The same subsection includes “Initial Sustainable Improvement Plan Requirements” which require that improvement plans “define the resource plan (financial and staff) for the school, including an analysis of equitable resource allocation.” DESE reviews each CSI	<i>Recommendations</i> The Department recommends that DESE: • Provide technical assistance to LEAs on utilizing the State’s resources to support LEAs to identify and address resource inequities within their CSI and ATSI plans. • Update its guidance and the CSI/ATSI plan template to make the identification of school-level resource inequities more explicit. • Revise its CSI and ATSI plan feedback rubric to include explicit review for identification and strategies to mitigate school-level resource inequities.

			plan and provides feedback on the extent to which the CSI plan reflects DESE’s Turnaround Plan Guidance for developing CSI plans. The feedback memo provides a summary analysis with examples for each section of the identified school’s CSI plan. While the process DESE described for developing support and improvement plans and the resources the State provides clearly requires CSI plans to identify and address resource inequities, it was unclear that the sample CSI plans consistently identify inequities related to resources. It was also unclear from the CSI plan feedback memos that the SEA’s feedback on CSI plans explicitly reviews to ensure that the plans consistently identify and address school-level resource inequities. The inequities identified in CSI plans appear to highlight general inefficiencies, or areas for improvement, rather than “resource inequities” (i.e., how the school and LEA will adjust resources to address the described inequities at the school-level). For example, one CSI plan identified inequities such as teachers not having a consistent approach to using data to inform their planning and practice, inconsistent communication and engagement with families, and inconsistent student performance from class to class. The school then identified strategies such as strengthening core instruction through implementation of inquiry cycles in content team meetings and develop a culture and climate team and implementing an advisory block to enhance student and family engagement. DESE annually monitors the implementation of each approved CSI plan through its Monitoring Site Visit (MSV) process. Each LEA with identified schools must submit a written reflection on the successes and challenges of the past year’s implementation. DESE’s contractor collects and reviews monitoring documentation, conducts the MSV, and develops a monitoring report for the LEA and school. Schools then follow DESE’s SIP Annual Renewal Process to update current strategies, describe the modifications or changes, and identify new benchmarks or goals in their CSI plans.	
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			<i>Additional Targeted Support and Improvement Plans</i> All schools identified for ATSI must develop and submit an ATSI plan through the LEA for review and approval by DESE in the same manner as described for CSI plans above. The only difference is that while the CSI school must complete a SIP using DESE’s template, the ATSI plan may be develop using a format of the school’s choice. DESE noted that the State has SIPs from every identified school. ATSI schools also have the option of receiving support from the SSoS. DESE stated that the guidance around resource inequities is the same for all identified schools. The sample ATSI plans identified general inequities which included unequal student engagement in coursework, lack of common planning time, and student safety. To address these inequities, the example ATSI plans identified strategies to establish an instructional leadership team, to implement common planning time, and to create a Positive Behavioral and Interventions and Supports (PBIS) team to plan for schoolwide PBIS implementation. Similar to CSI plans, while clearly required within DESE’s Turnaround Plan Guidance, ATSI plans appear to identify inequities, it is not evident, however, that LEAs consistently identify “resource inequities” within each school’s ATSI plan. <i>Other Technical Assistance and Support</i> DESE provides resources such as RADAR and Student Learning Experience (SLE) Summary Reports to assist the LEA in assessing inequities in access to resources for students and to inform strategies included in the CSI plan. In addition to RADAR and SLE, DESE’s SSoS website offers guidance on developing each section of the CSI and ATSI plan, particularly for identifying resource inequities to be addressed through implementation of the plan. Within the State’s guidance, DESE provides supporting resources and protocols to LEAs and schools on using data sources to assess systems, policies, practices, and resources, connecting the inequities to turnaround objectives and strategies, and	
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			developing a plan to ensure that resources are equitably distributed to support school improvement plans. DESE facilitated professional development sessions with LEAs related to resource inequities through its Prioritization Institute. At the Institute, LEAs were invited to review data through an equity lens and set priorities to address those equity gaps. LEAs were able to integrate many of the products developed at the Prioritization Institute into CSI and ATSI plans. DESE will also provide additional coaching support to ten LEAs that have requested follow-up with their work at the Prioritization Institute related to planning and addressing equity and opportunity gaps in school improvement plans.	
2023 – Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(c)(4)(C)(iii), 1111(d)(2)(C)-(D), and 1111(d)(3)(A)(i)(II)	Florida Department of Education (FDOE)	<i>Comprehensive Support and Improvement Schools</i> ESEA section 1111(c)(4)(D)(i)(I) requires a State to identify not less than the lowest-performing five percent of all Title I schools for comprehensive support and improvement (CSI) using the State’s methodology as described in its approved ESEA consolidated State plan. FDOE’s approved CSI identification methodology is to identify any Title I school that scores below 41 percent on the Federal percent of points index. FDOE also over-identifies schools for CSI by identifying any school that earns a school grade of D or F. However, in all communication with LEAs and supporting guidance documents submitted by FDOE, the criteria for CSI identification is stated as “a school grade of D or F and/or a graduation rate of 67 percent or below.” Based on the final list of schools identified based on data from the 2021-2022 school year submitted by FDOE subsequent to the review, there are 18 schools that scored below 41 percent on the Federal percent of points index but did not earn a school grade of D or F (i.e., earned a school grade of C or better). FDOE did not provide evidence that these schools were appropriately notified of their CSI designation based on the Federal percent of points index. However, the Department was able to confirm that these schools did complete a school improvement plan.	Within 60 business days of receiving this report: 1. FDOE must provide evidence (e.g., business rules) that it has modified its methodology for identifying schools for ATSI such that a school meeting the criteria for TSI identification is eligible for ATSI identification. 2. FDOE must provide evidence that it has notified those schools that met its Federal designation criteria (i.e., schools that scored below 41 percent on the Federal percent of points index but did not earn a school grade of D or F). 3. FDOE must modify its communication and supporting materials to LEAs to clarify that any Title I school that scores below 41 percent on the Federal percent of points index will be identified for CSI.

			<i>Targeted Support and Improvement Schools (Additional Targeted Support)</i> Under ESEA section 1111(d)(2)(C), an SEA may not exclude TSI schools from the pool of eligible schools for ATSI identification. At a minimum, a State must identify ATSI schools from among TSI schools or, at its discretion, a State may identify ATSI schools from among all public schools, including those identified for TSI. While the State published on its website a final list of schools identified based on data from the 20212022 school year, which appeared to indicate that FDOE identified all schools that met the criteria for ATSI identification (e.g., including schools that met the identification criteria for TSI schools), subsequent to the review, FDOE submitted a document that indicated it excluded TSI schools from the pool of schools eligible to be identified as ATSI. By excluding TSI schools from the pool of schools eligible to be identified as ATSI, FDOE’s methodology is inconsistent with statutory requirements. Excluding TSI schools from the pool of schools eligible to be identified as ATSI prevents such schools from being subject to the requirement in ESEA section 1111(d)(3)(A)(i)(II) that ATSI schools that do not meet statewide exit criteria within a State-determined number of years be identified for CSI.	
2023 –Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), and 1111(d)(3)(A)	Florida Department of Education (FDOE)	<i>Support and Improvement Plan Development</i> ESEA sections 1111(d)(1)(B) and (d)(2)(B) requires that each school identified for CSI, TSI, or ATSI develop a support and improvement plan in partnership with stakeholders (including principals and other school leaders, teachers, and parents). While FDOE demonstrated that each traditional public school meets this requirement through the engagement of a School Advisory Council, FDOE clearly indicated that public charter schools are not required to have School Advisory Councils and, therefore, are not required to develop support and improvement plans in partnership with stakeholders.	Within 60 business days of receiving this report, FDOE must submit: 1. Evidence (e.g., revised guidance, frequently asked questions, or SIP template) that FDOE modified its policies so that public charter schools identified for CSI, TSI, or ATSI meet the requirement to develop support and improvement plan in partnership with stakeholders, including principals and other school leaders, teachers, and parents. This may include requiring public charter schools identified for support and improvement to collaborate with School Advisory Councils in the same manner as traditional public schools or FDOE may meet this requirement through other means.

		ESEA section 1111(d)(1)(B)(i) and (d)(2)(B)(i) requires each school identified for CSI, TSI, or ATSI to develop a support and improvement plan that is informed by all indicators in the State’s accountability system. FDOE demonstrated that each plan is informed by outcomes from the Academic Achievement indicator, the Graduation Rate indicator, the Progress in Achieving English Language Proficiency indicator, and two of its four SQSS indicators (i.e., Science and Social Studies achievement). However, FDOE confirmed that the data included in the School Improvement Plan (SIP) does not include outcomes at the “All Students” level for its other two School Quality and Student Success indicators (i.e., Middle School Acceleration and College and Career Acceleration). While FDOE provided documentation that part of the SIP guidance includes a link to the ESEA report card, which includes the required indicator data, there is no requirement that each identified school view the report card and include that information as part of the development of the plan.as part of the development of the plan. ESEA section 1111(d)(1)(B)(4) and (d)(2)(C) requires each school identified for CSI and ATSI to develop a plan that identifies resource inequities to be addressed through implementation of the plan. FDOE indicated that it does not ensure that each school meets this requirement. <i>Comprehensive Support and Improvement Plan Implementation</i> ESEA section 1111(d)(1)(B)(vi) requires the State to monitor and periodically review implementation of each CSI plan after approval for each school identified by the State. While FDOE meets this requirement for traditional public schools, it does not periodically review or monitor implementation of CSI plans for public charter schools. Instead, FDOE requires the charter school sponsor (i.e., the LEA) to do so. FDOE may not delegate its responsibility to monitor and periodically review the implementation of CSI plans for public charter schools to the LEA or any other entity.	- Evidence that FDOE revised its SIP template for CSI, TSI, and ATSI plans to be informed by all indicators in the State’s ESEA accountability system to include outcomes for the two missing SQSS indicators (i.e., Middle School Acceleration and College and Career Acceleration) at the “All Students” level. - Evidence that the SIP template for CSI and ATSI schools includes the requirement to identify resource inequities to be addressed through implementation of the plan. - Evidence (e.g., revised monitoring plan and guidance) that FDOE modified its policies so that it monitors and periodically reviews each CSI plan for identified public charter schools instead of delegating such responsibility to the charter school sponsor. - Evidence that FDOE ensures that each LEA review targeted support and improvement plans before approval (e.g., revised monitoring protocol and communication to LEAs). - Either a) an amendment to its approved ESEA consolidated State plan if it wishes to modify its approved CSI exit criteria or b) provide evidence that it updated its guidance to align with the CSI exit criteria as described in its approved ESEA consolidated State plan. - A timeline and a plan for ensuring that the SEA completes the resource allocation review of each LEA serving a significant number of CSI or TSI schools resulting in the completion of at least one resource allocation review no later than December 2023. The plan should include procedures for periodically conducting resource allocation reviews in the future, including how FDOE will determine which LEAs serve a significant number of CSI schools and schools implementing targeted support and improvement plans (i.e., TSI and ATSI schools) and its general process for conducting these reviews (e.g., draft resource allocation protocol). FDOE must also provide evidence of a completed resource allocation review to resolve this action.
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			<i>Targeted Support and Improvement Plans</i> ESEA section 1111(d)(2)(B) and (C) requires each school identified for TSI or ATSI to develop a support and improvement plan that must be approved and monitored by the LEA. Although the SIP guide strongly encourages collaboration between the identified school and LEA, FDOE was unable to demonstrate that it ensures each LEA reviews targeted support and improvement plans for TSI and ATSI schools before approval. <i>Exit Criteria</i> ESEA section 1111(d)(3)(A)(i)(I) requires each State to establish exit criteria for all CSI schools that ensures continued progress to improve student academic achievement and school success in the State. FDOE provided inconsistent information regarding its CSI exit criteria. In its approved ESEA consolidated State plan, FDOE states that a CSI school may exit if it scores 41 percent or higher on the Federal percent points of index, earns a school grade of C or higher, and has a four-year adjusted-cohort graduation rate (ACGR) above 67 percent. In the guidance document it submitted, FDOE indicates that a CSI school may exit if it earns a school grade of C or higher. During the review, FDOE indicated that a CSI school may exit if it scores 41 percent or higher on the Federal percent of points index and has a four-year ACGR of 67 percent or higher. <i>Resource Allocation Review</i> ESEA section 1111(d)(3)(A)(ii) requires the SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. FDOE indicated that it has not conducted such a review.	<i>Recommendations</i> 1. The Department recommends that FDOE review its overall communication and guidance to LEAs and schools related to schools identified based on subgroup performance to ensure that the specific plan requirements are clear, as well as school improvement responsibilities for charter schools (i.e., which responsibilities are the charter school's and which are the sponsor district's). 2. Additionally, The Department recommends that FDOE require each TSI and ATSI plan to explicitly address the subgroup that led to identification.
2023 – Consolidated	1003 School Improvement	Florida Department of Education (FDOE)	<i>Section 1003 Application</i> Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will:	Within 60 business days of receiving this report, FDOE must submit:

	ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	1. Develop comprehensive support and improvement plans under ESEA section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under ESEA section 1111(d)(2), if applicable; 3. Monitor schools receiving funds; 4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans. FDOE’s application template does not require each LEA to describe how it will monitor schools receiving funds. If an LEA uses section 1003 funds to pay for an evidence-based intervention, activity, or strategy, ESEA section 8101(21)(B) requires that the evidence-based intervention, activity, or strategy meet the first three tiers of evidence outlined in the statute (i.e., be based on strong, moderate, or promising evidence of a statistically significant effect on improving student outcomes or other relevant outcomes). FDOE addresses this requirement through its internal application review process and feedback form and an assurance in the application template that the LEA will ensure implementation of evidence-based instructional programs. However, there is no formal process to check for this requirement during the State’s review of the application. <i>Section 1003 Eligibility</i> Under ESEA section 1003(b)(1)(A), LEAs with schools implementing comprehensive or targeted support and improvement activities under ESEA section 1111(d) are eligible for section 1003 funds. In its approved ESEA consolidated State	1. Evidence that it updated its section 1003 (i.e., “UniSIG”) application template to require each LEA to describe how it will monitor schools receiving section 1003 funds. 2. Evidence that it updated its policies (e.g., UniSIG companion guide, grant award document) to only award section 1003 funds to schools that meet Federal school identification criteria. <i>Recommendations</i> The Department recommends that FDOE explicitly state in its guidance and communication to LEAs that activities funded by UniSIG should be a part of the School Improvement Plan (SIP) monitoring and reflection activities. The Department also recommends that FDOE add an explicit check in its internal UniSIG review processes (e.g., in the feedback form, in an internal checklist) for ensuring that any evidence-based interventions funded by section 1003 funds are based on strong, moderate, or promising evidence.
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			plan, FDOE identifies any school with a Federal percentage of points index at or below 41 percent for CSI. FDOE chooses to overidentify schools for CSI by also including any schools whose Federal percentage of points index is at or above 41% and earns a D or F school grade; however, only schools that are identified under ESEA section 1111(c) and (d) (i.e., identified based on the Federal percentage of points index) are eligible to receive section 1003 funds. FDOE indicated that it is awarding funds to any Title I school that earns a school grade of D or F and awarded funds to at least one school following the 2018-2019 school year that did not meet its Federal definition for CSI or ATSI.	
2023 – Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(c)(4)(C)(iii), 1111(d)(2)(C)-(D), and 1111(d)(3)(A)(i)(II)	Maine Department of Education (MDOE)	<i>Comprehensive Support and Improvement Schools (Low Graduation Rates) and Targeted Support and Improvement Schools due to Consistently Underperforming Subgroups (TSI)</i> An SEA establishes its State accountability system for ESEA Title I in its approved ESEA consolidated State plan (or, for the 2022-2023 school year based on 2021-2022 results, the associated ESEA State plan Addendum), including methodologies for identifying schools for comprehensive support and improvement (CSI), which MDOE refers to as Tier III schools, targeted support and improvement due to consistently underperforming subgroups (TSI), which MDOE refers to as Tier II schools, or additional targeted support and improvement (ATSI), which MDOE refers to as Tier I schools. This includes the SEA’s methodologies for identifying CSI-Low graduation rate schools. MDOE’s procedures for identifying CSI-Low graduation rate schools, described in its Maine School Accountability System Implementation Specifications, 2021-2022 Academic Year (pp. 49 & 50) and confirmed during interviews for this performance review, are not consistent with Maine’s approved ESEA consolidated State plan, 2019 (p. 51). MDOE’s procedures for identifying CSI-Low graduation rate schools in Maine’s consolidated State plan (2019) are to identify high schools with a graduation rate below 86 percent. MDOE’s procedures described in its Maine School Accountability System Implementation	Within 60 business days of receiving this report, MDOE must submit to the Department: • A request to amend its ESEA consolidated State plan to reflect its current practice for identifying CSI-Low graduation rate schools. (Comprehensive Support and Improvement Schools (Low Graduation Rates) • Documentation that clearly indicates whether it identified schools for TSI using data from the 2021-2022 school year using the methodology described in MDOE’s ESEA State plan Addendum 2022 (i.e., the same methodology MDOE used for identifying ATSI schools) or the methodology described in its notification letter to newly identified TSI schools. (Targeted Support and Improvement Schools (Consistently Underperforming Subgroups) • For the 246 schools MDOE documented as identified as ATSI for the 2019-2020 school year, a list of these schools no longer in ATSI status for the 2022-2023 school year with an explanation for the change in status. For the previously identified schools that remain in ATSI status, evidence that MDOE is requiring the schools to implement a school support and improvement plan during the 2023-2024 school year (e.g., copy of communication or guidance provided to LEAs and schools regarding plan requirements). (Additional Targeted Support and Improvement Schools)

		Specifications, 2021-2022 Academic Year are to identify high schools with 4-year and combined 5- and 6-year ACGRs for the “all students” group below 67 percent. While this is permissible under the ESEA, the State’s ESEA consolidated State plan must accurately describe MDOE’s methodology for identifying CSI-Low graduation rate schools. In MDOE’s ESEA State plan Addendum 2022, for data for the 2021-2022 school year for school identifications for the 2022-2023 school year, MDOE revised its methodology for identifying schools for TSI. Specifically, MDOE revised its methodology to identify TSI schools to use the same methodology it would use to identify ATSI schools. However, the sample notification letter for schools identified for TSI submitted by MDOE indicates MDOE identified for TSI schools with one or more student populations consistently experiencing challenges (over three years) in the same indicator(s), which is different from its approved methodology for identifying schools for TSI in its ESEA State plan Addendum 2022. <i>Additional Targeted Support and Improvement Schools</i> A school identified for ATSI must continue to be identified as ATSI until it meets the State-defined exit criteria. (ESEA section 1111(d)(3)(A)(i)). An SEA also must publicly report the number and names of all public schools in the State identified for ATSI. (ESEA section 1111(h)(1)(C)(i)(V)). For the performance review, MDOE stated that 107 schools were identified for ATSI for the 2022-2023 school year based on data from the 2021-2022 school year. However, in documentation submitted to the Department on November 30, 2019, MDOE documented that 246 schools were identified for ATSI in Maine for the 2019-2020 school year based on data from the 2018-2019 school year. ATSI exit criteria in MDOE’s approved ESEA consolidated State plan (p. 55) require schools to show three consecutive years of progress using its accountability model in its	
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			ESEA consolidated State plan to exit ATSI status (called Tier I status in Maine). Due to the COVID-19 pandemic, MDOE requested and received accountability and school identification waivers. In addition to permitting the State to pause the identification of new schools in 2019-2020 and 2020-2021, MDOE could not exit any school that was previously identified for CSI, TSI, or ATSI. As a result, no schools in Maine would have been eligible to exit ATSI status between 2019-2020 and 2022-2023.	
2023 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), 1111(d)(3)(A), and 8101(21)(B)	Maine Department of Education (MDOE)	<i>School-Level Plan Requirements</i> Schools identified for CSI (called Tier III schools in Maine), TSI (called Tier II schools in Maine), or ATSI (called Tier I schools in Maine) must develop school improvement plans. To receive funds under ESEA section 1003 to serve identified schools, an LEA also must submit an application to the SEA describing how it will use the funds for each identified school to be served. MDOE described its process for school planning, which uses one LEA- and school-level comprehensive needs assessment (CNA) template and certain companion documents (i.e., application for ESEA section 1003 funds and review checklist, a memorandum of understanding (MOU), and schoolwide program plan review rubric) to meet school-level planning requirements for CSI, TSI, and ATSI plans (in addition to for Title I schoolwide program plans) and LEA applications for ESEA section 1003 funds for identified schools. Only Title I schools and LEAs complete the CNA. The CNA requires completion of a data collection and analysis section regarding student outcomes and other educationally related data. Please see Schoolwide Program section of this report for more information regarding required actions for those plans. <i>Support and Improvement Plans (ESEA section 1111(d)(1)(B) and (d)(2)(B)</i> Each school identified for CSI must develop and implement a school-level CSI plan that:	Within 60 business days of receiving this report, MDOE must submit to the Department: • Evidence that it has revised its template(s), instructions, and rubrics for reviewing CSI, ATSI, and TSI plans, including for CSI, ATSI and TSI schools that implement Title I targeted assistance programs or are not Title I schools, to address all applicable requirements. MDOE must make these revisions for CSI, ATSI and TSI plans for schools identified in fall 2023 based on data from the 2022-2023 school year. (School-Level Plan Requirements) • Updated guidance regarding requirements for LEAs for ATSI and TSI schools and evidence that the guidance has been distributed to LEAs and schools. (Implementation of ATSI and TSI Plans) • A plan and timeline for monitoring LEAs' implementation of ATSI and TSI plans and related requirements applicable to the LEA and ATSI and TSI schools in the LEA (see Overarching Subrecipient Monitoring Issue and Required Action). (Implementation of ATSI and TSI Plans) • A request to amend its current approved ESEA consolidated State plan to define CSI and ATSI exit criteria that meet ESEA requirements. In addition, MDOE's must submit a revised Guide to Maine's Model of School Support that correctly states CSI exit criteria (i.e., states CSI schools may exit status only after demonstrating improve student achievement as defined in the State's approved ESEA consolidated State plan and which removes the statement that CSI schools are

			• Is developed and implemented in partnership with stakeholders; • Is developed and implemented for the school to improve student outcomes; • Is informed by all indicators in the State’s Title I accountability system, including student performance against State-determined long-term goals; • Includes evidence-based interventions; • Is based on a school-level needs assessment; • Identifies resource inequities, which may include a review of LEA and school-level budgeting, to be addressed through implementation of such CSI plan; • Is approved by the school, LEA, and SEA; • Upon approval and implementation, is monitored and periodically reviewed by the SEA. Each school identified for ATSI or TSI must develop and implement a school-level targeted support and improvement plan that: • Is developed and implemented in partnership with stakeholders; • Is developed and implemented to improve student outcomes; • Based on the indicators in the statewide accountability system for each subgroup of students for which the identification is based; • Informed by all indicators, including student performance against long-term goals; • Includes evidence-based interventions; • Is approved by the LEA prior to implementation of such plan; and • For ATSI schools only, identifies resource inequities (which may include a review of LEA- and school-level budgeting), to be addressed through implementation of such plan.	identified only for a period of three years, which is inconsistent with the ESEA). (Exit Criteria) • With respect to the requirement to periodically reviewing the resource allocation in LEAs serving a significant number or percentage of identified schools: ○ The methodology MDOE will use for determining if an LEA serves a significant number of identified schools. ○ A plan and a timeline for implementing periodic resource allocation reviews, which must begin in the 2023-2024 school year, and consistent with the requirements in ESEA section 1111(d)(3)(A)(ii) (e.g., protocols, resources considered, LEA selection criteria, frequency of reviews, how results will be used) to support school improvement in each LEA serving a significant number of identified schools. The evidence must include a schedule for a first cycle of resource allocation reviews. (Resource Allocation) <i>Recommendations</i> The Department recommends MDOE implement steps to ensure student and educator PII is not disclosed as part of CNAs for LEAs and their schools during development or in cases where a school or LEA makes its CNA publicly available. (Publicly Available School Plans) cycle of resource allocation reviews. (Resource Allocation)
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			MDOE described that a school’s CSI plan consists of the school’s CNA, the LEA’s application for ESEA section 1003 funds for the school, and an MOU. MDOE also described it reviews CSI plans based on its Title I, Part A Schoolwide Program Plan Requirements and Rubric and a checklist for communication between MDOE and LEAs regarding the allowability and allocability of items submitted in the ESEA section 1003 funding application. MDOE’s processes do not ensure that a CSI plan meets requirements. Specifically, • Because neither the CNA template nor the MDOE’s corresponding rubric indicate which sections of the CNA must be completed at the school-level by CSI schools, rather than the LEA level, it is not clear how MDOE ensures a CSI plan meets requirements for a school-level needs assessment based on school-level data. • Because MDOE does not require that the data analysis section in the CNA (or any other section for CSI plans) include school performance on State assessments required under Title I and on indicators used for Maine’s accountability system under Title I, MDOE’s processes do not ensure a school’s CSI plan is informed by school-level performance on all indicators in the State’s Title I accountability system, including student performance against State-determined long-term goals. • It is not clear how MDOE ensures that non-Title I schools identified for CSI (due to low graduation rates) develop CSI plans. MDOE’s processes do not clearly ensure that each ATSI and TSI plan meets requirements. Specifically: • Because neither the CNA template nor the MDOE’s corresponding rubric indicate which sections must be completed at the school-level by TSI and ATSI schools, rather than the LEA-level, it is not clear how MDOE ensures	
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			a TSI or ATSI plan meets requirements for stakeholder involvement in plan development, • Because MDOE does not require that the data analysis section in the CNA (or any other section for ATSI/TSI plans) include performance on State assessments required under Title I and on indicators used for Maine’s accountability system under Title I for accountability subgroups, MDOE’s procedures do not ensure a school’s TSI or ATSI plan is informed by the performance of the subgroups for which the school was identified on all indicators in the State’s Title I accountability system, including student performance against State-determined long-term goals. • MDOE’s procedures do not ensure a school’s TSI or ATSI plan is developed and implemented to improve student outcomes based on the indicators in the statewide accountability system for each subgroup of students for which the identification is based. • Because the CNA template does not address use of evidence-based interventions, MDOE’s procedures do not ensure a school’s TSI or ATSI plan is Includes evidence-based interventions. • For ATSI plans only, because the CNA template does not address identification of resource inequities, MDOE’s procedures do not ensure a school’s ATSI plan identifies resource inequities to be addressed through implementation of the plan. • It is not clear how MDOE ensures that non-Title I schools identified for TSI and ATSI develop these plans. <i>Implementation of ATSI and TSI Plans</i> For each school identified for ATSI or TSI, the SEA must notify each LEA of a school served by the LEA of the identification. In addition, for each school identified for ATSI or TSI in an LEA, the LEA must: • Notify the school;	
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			• Approve the school’s support and improvement plan prior to implementation of such plan; and • Monitor the school’s implementation of its support and improvement plan. (ESEA section 1111(d)(2)(A)-(C)) MDOE did not demonstrate that it had informed LEAs with schools identified for ATSI or TSI of requirements applicable to the LEAs and schools as a result of the identifications or that MDOE had taken steps to ensure that LEAs and schools met the requirements (i.e., that all ATSI schools implement ATSI plans and that LEAs are monitoring the implementation of ATSI plans in schools in the LEAs.) <i>Exit Criteria</i> CSI schools exit CSI status only by meeting State-defined exit criteria. (ESEA section 1111(d)(3)(A)(i)). ATSI schools exit ATSI status only by meeting State-defined exit criteria. (ESEA section 1111(d)(3)(A)(ii)) Because MDOE has changed the assessments it administers for ESEA Title I purposes, MDOE cannot implement the CSI exit criteria and ATSI exit criteria in its current approved ESEA consolidated State plan. In addition, MDOE’s Guide to Maine’s Model of School Support (p. 7) states that CSI schools are identified for a period of three years and does not clarify that a CSI school that does not meet the State-defined exit criteria remains identified and is subject to more rigorous State-determined action. <i>Resource Allocation</i> ESEA section 1111(D)(3)(A)(ii)-(iii) requires an SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of schools identified for CSI and implementing ATSI and TSI plans (i.e., ATSI and TSI schools).	
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			MDOE does not have a methodology for determining if an LEA serves a significant number of identified schools. MDOE has not yet developed procedures for or implemented periodic resource allocation reviews to support school improvement in each LEA serving a significant number of identified schools. MDOE documented it considers school identification statuses as part of its risk assessments for MDOE’s subrecipient monitoring. However, MDOE did not demonstrate that this process determines which LEAs in the State serve a significant number of identified schools or that the results are used to conduct resource allocation reviews for LEAs that serve a significant number of identified schools.	
2023 – Consolidated	1003 School Improvement ESEA § 1003 and 1111(d)(1)-(2)	Maine Department of Education (MDOE)	ESEA section 1003 requires the SEA to conduct a rigorous review of 1003 school improvement funds to ensure that LEAs meet all requirements when using these funds. MDOE indicated that it reviews LEA reimbursements and conducts ongoing communication with LEAs regarding allowable uses of 1003 school improvement funds. However, MDOE does not have a specific monitoring schedule or protocol for evaluating these ESEA section funds. ESEA section 1003(b)(2)(A) requires the SEA to establish a method for allocating 1003 school improvement funds that takes geographic diversity into account and ensures that LEA subgrants are of sufficient size and duration to enable the effective implementation of selected strategies. MDOE provided a spreadsheet that includes the allocation amounts for each school receiving 1003 school improvement funds. While MDOE indicated that it takes into account school size, special education population, socioeconomic status, and student population when determining 1003 school improvement fund allocations, it is unclear how these factors are included in its allocation amount formula calculations. ESEA section 1003(f)(2)-(3) requires that an SEA’s method of allocating section 1003 subgrants gives priority to LEAs that demonstrate the greatest need for section 1003 funds and	Within 60 business days of receiving this report, MDOE must provide to the Department: • A plan and timeline for monitoring LEA administration of ESEA section 1003 funds and applicable requirements (see Overarching Subrecipient Monitoring Issue and Required Action), including program implementation and allowable uses of funds. MDOE must provide evidence (e.g., monitoring schedule, monitoring protocol) that demonstrate it is ensuring compliance at the LEA- and school-levels with all requirements, consistent with its plan and timeline. • Documentation regarding the State’s formula for calculating allocation amounts for ESEA section 1003 school improvement funds, including how it considers geographic diversity and ensures that each LEA subgrant is of sufficient size. • Evidence that MDOE gives priority to LEAs that demonstrate the greatest need for ESEA section 1003 funds and demonstrate the strongest commitment to using ESEA section 1003 funds to enable the lowest-performing schools to improve student achievement and student outcomes.

			demonstrate the strongest commitment to using 1003 funds to enable the lowest-performing schools to improve student achievement and student outcomes. It is unclear how MDOE considers these requirements when allocating section 1003 subgrants.	
2023 – Consolidated	Identification of Schools ESEA § 1111(4)(D), 1111(4)(I)(iii), 1111(d)(2)(D), 1111(d)(3)(A)(i)(II)	New Mexico Public Education Department (NMPED)	ESEA section 1111(c)(4)(D)(i)(II) requires each public high school in the State failing to graduate one-third or more of its students to be identified for comprehensive support and improvement (CSI). NMPED’s business rules for school support and improvement identification state that only a Title I school can be identified for CSI (page 6) and that a Title I school is identified for CSI based on low graduation rate if the school, “has a four-year graduation rate less than or equal 66.7 percent for two of the past three years” (page 1). The methodology outlined in NMPED’s business rules is not compliant with ESEA section 1111(c)(4)(D)(i)(II). NMPED’s methodology only identifies Title I schools, instead of all public high schools, for CSI based on low graduation rate. Additionally, NMPED’s business rules are inconsistent with the statute because schools are only identified if they have a four-year graduate rate less than or equal to 66.7 percent for multiple years. While the ESEA permits a State to average data over multiple years, the State may not limit identification to multiple years of being below the threshold. Finally, NMPED’s business rules do not align with the methodology in NMPED’s approved ESEA consolidated State plan. NMPED’s approved ESEA consolidated State plan describes using an average of three years of four-year ACGR data to identify all public high schools for CSI based on low graduation rate (page 94). NMPED submitted additional information to the Department in March 2024 which the Department will review as it works with NMPED to resolve its required actions.	Within 60 days business days of receiving this report, NMPED must submit to the Department the following information: 1. Updated business rules for identifying schools for CSI based on low graduation rate consistent with the statutory requirements and its approved ESEA consolidated State plan (i.e., rules that use an average of three years of four-year ACGR data to identify all public high schools for CSI based on low graduation rate) to be used beginning with school identifications based on data from the 2023-2024 school year. 2. Evidence that the updated rules for identifying schools for CSI based on low graduation rate consistent with statutory requirements and NMPED’s approved ESEA consolidated State plan have been communicated with LEAs.

2023 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2) and 1111(d)(3)(A)	New Mexico Public Education Department (NMPED)	<i>Exit Criteria</i> ESEA section 1111(d)(3)(A)(i) requires each State to establish statewide exit criteria for schools identified for CSI and additional targeted support and improvement (ATSI), respectively, that ensure continued progress to improve academic achievement and school success in the State. A school identified for CSI that does not satisfy such criteria within a State-determined number of years must be subject to more rigorous State-determined action. A school identified for ATSI that does not satisfy such criteria within a State-determined number of years must be identified for CSI. In its approved COVID-19 State plan addendum, NMPED indicated that previously identified schools will continue to be supported and will be eligible to exit following 2022-2023 accountability. Therefore, no identified schools besides CSI–Low Graduation Rate (i.e., schools identified for CSI based on low graduation rate) schools were eligible to exit status or be identified as either CSI if it was previously identified for ATSI, or subject to more rigorous interventions (i.e., called “MRI” in New Mexico) if it was previously identified for CSI following 2021-2022 accountability in June 2023. In its approved State plan addendum, for a CSI or ATSI school that was identified in 2018-2019 to exit status in the 2022-2023 school year, NMPED was required to examine the relative ranking of the school’s assessment proficiency rates between school years 2018-2019 and 2022-2023 and the change in proficiency rates for the school between school years 2021-2022 and 2022-2023. If both of those measures increase, the school will be eligible to exit status. The State proposed this methodology because it changed statewide summative assessments multiple times since the schools were originally identified in 2018-2019 and could not directly measure progress to improve academic achievement between 2018-2019 and 2022-2023. NMPED indicated that despite its approved COVID-19 State plan addendum stipulating that no identified schools besides schools	Within 60 business days of receiving this report, NMPED must submit evidence that: - Any ATSI or CSI–Lowest Performing 5 percent school that erroneously exited status, following the 2021-2022 school year was either re-identified if it did not meet approved exit criteria as described in NMPED’s approved State plan addendum, or that such a school met approved exit criteria. - The State modified its policies so that public charter schools identified for CSI, TSI, or ATSI must develop support and improvement plan consistent with statutory requirements (e.g., revised guidance, frequently asked questions, or DASH plan template). - NMPED explicitly ties the DASH plan process to CSI, TSI, and ATSI plan requirements (e.g., revised DASH plan, guidance, communication to LEAs). - NMPED revised its DASH plan template for CSI, TSI, and ATSI schools to be informed by all indicators in the State’s ESEA accountability system to include outcomes for the Academic Achievement, Graduation Rate, Other Academic, Progress in Achieving ELP, and SQSS indicators. - The DASH plan template for CSI and ATSI schools includes the requirement to identify resource inequities to be addressed through implementation of the plan. - NMPED ensures that each LEA review, approve, and monitor targeted support and improvement plans before approval (e.g., revised monitoring protocol and communication to LEAs). - NMPED ensures that LEAs take additional action following unsuccessful implementation of a targeted support and improvement plan (i.e., for schools identified for targeted or non-Title I additional targeted support and improvement) after a number of years determined by the LEA (e.g., guidance, training, monitoring protocols). In addition, within 60 business days NMPED must provide: - A timeline and a plan for ensuring that the SEA completes the resource allocation review of each LEA serving a significant
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		identified for CSI–Low Graduation Rate would exit, NMPED exited some CSI and ATSI schools in June 2023 based only on the relative ranking of the school’s assessment proficiency rates between school years 2018-2019 and 2021-2022, which meant that some schools without improved academic achievement were exited. Additionally, some CSI and ATSI schools did not exit based on the relative ranking of the school’s assessment proficiency rates between school years 2018-2019 and 2021-2022 data and were identified as CSI–More Rigorous Interventions (MRI) or CSI schools, respectively, in June 2023. Based on the July 13, 2023, letter from the Department to NMPED and corresponding condition on its FY 2023 Title I, Part A grant award, NMPED was required to implement its school year 2022-2023 accountability system and identify new schools no later than November 15, 2023. NMPED submitted evidence that it identified schools on November 15, 2023. Specifically, NMPED submitted an example of a memorandum sent to an LEA outlining its school support and improvement designations for school year 2022-2023, as well as a list of schools with their respective school support and improvement designations for school years 2022-2023, 2021-2022, and 2018-2019. While the submitted evidence met the requirement in the July 13, 2023, letter, it was not clear whether the issue described in the preceding paragraph was resolved (i.e., there was no indication in the Excel file which schools were reidentified based on failure to meet the approved exit criteria in the preceding school year). <i>Support and Improvement Plan Development</i> ESEA sections 1111(d)(1)(B) and (d)(2)(B) require each school identified for CSI, targeted support and improvement (TSI), or ATSI, including public charter schools, to develop a support and improvement plan. NMPED has not required public charter schools identified for support and improvement to develop a support and improvement plan. NMPED did not demonstrate that all public charter schools must meet these requirements. NMPED	number of CSI or TSI schools resulting in the completion of at least one resource allocation review no later than December 2024. The plan should include procedures for periodically conducting resource allocation reviews in the future, including how NMPED will determine which LEAs serve a significant number of CSI schools and schools implementing targeted support and improvement plans (i.e., TSI and ATSI schools) and its general process for conducting these reviews (e.g., draft resource allocation protocol). 2. Evidence of a completed resource allocation review.
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			submitted additional information to the Department in March 2024 which the Department will review as it works with NMPED to resolve its required actions. NMPED uses its DASH plan process, which is how LEAs and schools meet schoolwide program plan requirements, to meet CSI, TSI, or ATSI plan requirements in ESEA sections 1111(d)(1)(B) and (d)(2)(B). Generally, NMPED has not provided communication or guidance explicitly tying the DASH plan to CSI, TSI, or ATSI plan requirements. NMPED stated that its future plan templates, communication, and monitoring efforts will address this issue. NMPED stated that it is currently developing a new DASH plan template, monitoring tools, and review processes for identified schools, with a goal of completion by November 2023. ESEA section 1111(d)(1)(B)(i) and (d)(2)(B)(i) requires each school identified for CSI, TSI, or ATSI to develop a support and improvement plan that is informed by all indicators in the State’s accountability system. NMPED lists several data points related to indicators as options for schools to review, but does not explicitly require each CSI, TSI, or ATSI plan to be informed by its Other Academic indicators, Progress in Achieving English Language Proficiency (ELP) indicator, and its School Quality and Student Success (SQSS) indicators (i.e., attendance, opportunity-to-learn, science achievement, and chronic absenteeism). Further, while data from the Academic Achievement indicator is required for elementary and secondary schools that are not high schools, high schools are given an option to consider either data from the Academic Achievement indicator or the Graduation Rate indicator. ESEA section 1111(d)(1)(B)(4) and (d)(2)(C) requires each school identified for CSI and ATSI to develop a plan that identifies resource inequities to be addressed through implementation of the plan. NMPED indicated that although related conversations occur	
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			during the development of the plan, it does not ensure that each CSI and ATSI school meets this requirement. ESEA section 1111(d)(1)(B)(ii) and 1111(d)(2)(B)(ii) requires each school identified for CSI, TSI, or ATSI to develop a plan that includes evidence-based interventions. NMPED indicated that while it is currently developing a monitoring tool to address this topic, there is no process at this time for ensuring that each plan includes evidence-based interventions. <i>Oversight of Support and Improvement Plans</i> ESEA section 1111(d)(2)(B) and (C) requires each school identified for TSI or ATSI to develop a support and improvement plan that must be approved and monitored by the LEA. Although NMPED trains LEA reviewers to approve TSI and ATSI plans, NMPED did not demonstrate that it confirms that this review and approval occurs. Further, NMPED does not ensure that each LEA monitor implementation of TSI and ATSI plans. ESEA section 1111(d)(2)(B)(v) requires an LEA to take additional action following unsuccessful implementation of a TSI plan after a number of years determined by the LEA. NMPED indicated that it does not ensure that such action is taken. <i>Resource Allocation Review</i> ESEA section 1111(d)(3)(A)(ii) requires each SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. NMPED indicated that it has not conducted such a review.	
2023 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	New Mexico Public Education Department (NMPED)	ESEA section 1003(b) requires each State to use section 1003 school improvement funds to support schools identified for CSI, TSI, and ATSI only. ESEA section 1003 requires each State to allocate not less than 95 percent of the amount it reserves to make grants to LEAs, on a	Within 60 business days of receiving this report, NMPED must submit: 1. Evidence (e.g., guidance, award notice) that it has developed a process for awarding section 1003 subgrants consistent with ESEA section 1003(a)-(i).

			formula or competitive basis, to serve schools implementing comprehensive or targeted support and improvement activities under ESEA section 1111(d). Under ESEA section 1003(b)(2), a State may set aside up to five percent of its section 1003 funds to carry out its responsibilities with respect to those funds. Those responsibilities are: • Establishing the method the State will use to allocate funds to LEAs, including ensuring that the LEAs receiving a subgrant under ESEA section 1003 represent the geographic diversity of the State and the subgrants are of sufficient size to enable an LEA to effectively implement the selected strategies; • Monitoring and evaluating the use of funds by LEAs receiving section 1003 subgrants; and, • As appropriate, reducing barriers and providing operational flexibility for schools implementing comprehensive or targeted support and improvement plans under ESEA section 1111(d). Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will: 1. Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if applicable; 3. Monitor schools receiving funds; 4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; 5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans.	2. An LEA application for section 1003 funds consistent with ESEA section 1003(e). 3. Evidence that it has revised its written procedures (e.g., internal control processes, checks for allowable uses of funds) to ensure that activities paid for using the ESEA section 1003 State set aside funds are consistent with ESEA section 1003(b)(2), and that any activities funded by ESEA section 1003 support only schools that meet statutory requirements for the identification of CSI, TSI, and ATSI schools under ESEA section 1111(c) and 1111(d)(2)(C). This includes any activities paid for with its FY 2022 and 2023 section 1003 state set-aside funds (i.e., the State must ensure that its FY 2022 and FY 2023 state set-aside funds are used for allowable activities).
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			NMPED indicated that it does not currently have a section 1003 award process or application and did not make subgrants to LEAs between fiscal years (FY) 2021 and 2023. Therefore, it did not submit any evidence regarding its implementation of these requirements. NMPED is currently developing a new process for awarding section 1003 funds with the goal of publishing applications by November 15, 2023. Additionally, NMPED indicated that it had previously used its set-aside funds under ESEA section 1003(b)(2) to pay for leadership development for principals and teachers across the State (regardless of whether they were from an identified school). The leadership development activities did not appear to be related to school improvement or targeted specifically to improving CSI, TSI, or ATSI schools, as required. Finally, NMPED awarded “initial implementation funding” to newly identified schools in spring 2023, which consisted of FY 20 section 1003 funds that expired on September 30, 2023. While NMPED required certain information from identified schools, including describing alignment with the support and improvement plan, NMPED did not require an LEA application consistent with section 1003(e). Further, all LEAs that participated in this review indicated that the timeline to apply for and spend these funds was insufficient for meaningful activities.	
2023 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), and 1111(d)(3)(A)	Washington Office of Superintendent of Public Instruction (OSPI)	<i>Comprehensive Support and Improvement Plans</i> ESEA section 1111(d)(1)(B)(i)-(v) require that each school identified for CSI develop and implement a support and improvement plan that: • Is developed in partnership with stakeholders; • Is informed by all indicators in the State’s accountability system including student performance against long-term goals; • Includes evidence-based interventions; • Is based on a school-level needs assessment;	Within 60 business days of receiving this report, OSPI must submit to the Department: 1. Evidence that OSPI established a process to review and approve each support and improvement plan for schools identified for CSI. 2. Evidence that CSI plans include all requirements under ESEA section 1111(d)(1)(B)(i) (e.g., an updated School Improvement Plan Implementation Guide or school improvement plan template). Specifically, OSPI must demonstrate that it requires and ensures that each CSI plan:

		- Identifies resource inequities to be addressed in the plan (which may include a review of LEA and school-level budgeting); and - Is approved by the school, LEA, and SEA. In addition, ESEA section 1111(d)(1)(B)(vi) requires that an SEA monitor and periodically review the implementation of CSI plans. The Washington State legislature requires all public schools in the State to complete a school improvement plan. OSPI makes available an optional school improvement plan template that is available to all LEAs and public schools in the State (i.e., the template available to CSI school is the same template available to a school that is not identified for improvement). OSPI also provided examples of completed school improvement plans. The template and completed school improvement plans demonstrate that evidence-based interventions are required to be included in the school improvement plan. In addition, during the performance review, OSPI indicated that LEAs and schools must select evidence-based interventions from OSPI’s menu of best practices. OSPI also requires that each school improvement plan must be approved by the LEA and school. However, at the time of the performance review, OSPI did not demonstrate that it requires schools identified for CSI to develop a support and improvement plan that: - Is informed by all indicators in the State’s accountability system, including student performance against long-term goals; - Is based on a school-level needs assessment; - Identifies resource inequities to be addressed in the plan (which may include a review of LEA and school-level budgeting); and - Is approved by the SEA. In addition, OSPI does not approve support and improvement plans, including the school improvement plans of its CSI schools. Rather, after the school improvement plans are approved by the	- Is informed by all indicators in the State’s accountability system (e.g., the academic achievement indicator). - Identifies resource inequities to be addressed in the plan, which may include a review of LEA and school-level budgeting. - Evidence that OPSI ensures each LEA reviews and approves support and improvement plans for schools identified for TSI and ATSI that meets the requirements under ESEA section 1111(d)(2)(B) and (C) (e.g., an updated school improvement plan template for TSI and ATSI schools). Specifically, OSPI must demonstrate that it ensures each LEA reviews and approves support and improvement plans for TSI and ATSI schools that: - Are informed by all indicators in the State’s accountability system, including student performance against long-term goals. - For ATSI school only, identify resource inequities to be addressed throughout the implementation of the plan. - Evidence that OSPI ensures that each LEA monitors the implementation of support and improvement plans for schools identified for TSI and ATSI, including that each TSI plan must result in additional action following unsuccessful implementation of such plan after a number of years determined by the LEA [ESEA section 1111(d)(2)(B)(v)]. - Evidence that non-Title I schools identified due to CSI-low graduation rates which do not meet exit criteria after a State-determined number of years result in more rigorous interventions (e.g., updated communication materials or business rules). - A timeline and plan for conducting resource allocation reviews in each LEA serving a significant number of CSI, TSI, or ATSI schools in the 2023-2024 school year. In addition, in accordance with the State’s timeline and plan submitted in response to this required action, OSPI must submit evidence no later than September 2024 that it implemented this plan during the 2023-2024 school year (e.g., final procedures for
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			LEA and school, OSPI conducts mid-year and end-of-year reviews of school improvement plans of its CSI schools. OSPI provided examples of results of its mid-year and end-of-year reviews. While the State requires LEAs and schools to make changes to their approved plans as part of this review, OSPI does not review CSI plans that include the missing information described above. In addition, the State’s mid-year and end-of-year reviews do not relate to a school improvement plan approval process. After the performance review, OSPI released an updated school improvement plan template and implementation guidance document for the 2023-2024 school year on its website. The new template requires each school improvement plan to be developed in partnership with stakeholders (e.g., the new template includes a section to list school leadership team members and parent and community partners) and to identify resource inequities to be addressed in the plan. In addition, the new template explicitly requires the school to include the results from its comprehensive needs assessment. This information was not included in the 2022-2023 school improvement plan template that was provided prior to the performance review. Although some required CSI plan information was found in the 2023-2024 school improvement plan template, OSPI still does not demonstrate that it requires schools identified for CSI to develop a support and improvement plan that: • Is informed by all indicators in the State’s accountability system including student performance against long-term goals; and • Is approved by the SEA. <i>Targeted Support and Additional Targeted Support and Improvement Plans</i> ESEA section 1111(d)(2)(B) requires each school identified for TSI and ATSI develop a support and improvement plan that: • Is developed in partnership with stakeholders; • Informed by all indicators in the State’s accountability system including student performance against long-term goals;	reviewing resource allocation, sample documents from a completed resource allocation review with an LEA).
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			• Includes evidence-based interventions; and • Is approved by the LEA prior to the implementation of such plan. ESEA section 1111(d)(2)(C) requires that an ATSI plan identify resource inequities (which may include a review of LEA and school-level budgeting) to be addressed through implementation of such plans. With respect to the TSI and ATSI plan requirements described above, OSPI’s school improvement plan template is optional for its LEAs and includes a section for evidence-based interventions only. As a result, OSPI did not demonstrate that it ensures that each LEA reviews and approves TSI and ATSI plans that include all required elements described above. As noted above, after the performance review, OSPI released an updated school improvement plan template and implementation guidance document for the 2023-2024 school year on its website that requires the school and LEA to include information on parent and community partners and resources inequities (please see the final paragraph in the CSI plan sub-section above for information on the updates that OSPI made to its school improvement plan templates after the performance review). Although some information that is required in TSI and ATSI plans was found in the new school improvement plan template released after the performance review, OSPI still does not demonstrate that it ensures each LEA review and approves TSI and ATSI plans that are informed by all indicators in the State’s accountability system, including student performance against long-term goals. <i>LEA Responsibilities for the Implementation of Targeted Support and Improvement Plans</i> Under ESEA section 1111(d)(2)(B)(v), each TSI plan must result in additional action following unsuccessful implementation of such plans after a number of years determined by the LEA and	
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			SEA. OSPI did not demonstrate that it ensures LEAs require that a TSI plan result in additional action following unsuccessful implementation of the plan. <i>More Rigorous State-Determined Actions</i> ESEA section 1111(d)(3)(A)(i)(I) requires that CSI schools that do not meet the State’s exit criteria after a State-determined number of years take more rigorous State-determined actions. OSPI’s ESEA consolidated State plan (see pages 51-53) describe its more rigorous interventions for such schools. During the performance review, OSPI described that it refers to those schools that must implement more rigorous State-determined actions as “Tier III plus” schools. The documentation provided by OSPI indicates that in order to be re-categorized as a Tier III plus school, the school must have been a Title I school in the most recent school year. As a result, OSPI only requires Title I CSI schools that do not meet the State’s exit criteria to implement more rigorous State-determined actions after a State-determined number of years. However, the ESEA requires that all CSI schools (including non-Title I CSI schools that were identified due to a low-graduation rate) that do not meet the State’s exit criteria must implement more rigorous State-determined actions. Because non-Title I schools that were identified for CSI due to low graduation rates are not required to implement more rigorous State-determined actions after not meeting exit criteria, OSPI does not meet ESEA section 1111(d)(3)(A)(i)(I). <i>Resource Allocation Review</i> ESEA section 1111(d)(3)(A)(ii) requires the SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. OSPI currently does not have a procedure to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of schools identified for comprehensive, targeted, or additional targeted support and improvement.	
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2023 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Washington Office of Superintendent of Public Instruction (OSPI)	<i>Allocation of ESEA Section 1003 Funds</i> ESEA section 1003(b)(1)(A) requires an SEA to allocate no less than 95 percent of the amount reserved under ESEA section 1003(a) to LEAs to serve schools identified for CSI, TSI, or ATSI consistent with statutory requirements. Based on the documentation OSPI provided for fiscal year 2023, OSPI awarded only 60 percent of its funds reserved under ESEA section 1003(a) directly to LEAs serving schools identified for CSI, TSI, or ATSI. In addition to its allocations to LEAs, OSPI awarded section 1003 funds to Educational Service Districts (ESD) under its Statewide Improvement Network grant program and allocated a portion of its section 1003 reservation for leadership pilot programs, contracts, professional development for LEAs and contractors, and indirect costs. As indicated above, the ESEA requires that no less than 95 percent of the amount reserved under ESEA section 1003(a) be allocated to LEAs to serve schools identified for CSI, TSI, or ATSI. As such, many of the activities that OSPI supported with these funds were not permissible. If an SEA plans to award less than 95 of its section 1003 reservation to LEAs, it may only do so to provide direct services to LEAs. Specifically, ESEA section 1003(b)(1)(B) requires an SEA to seek approval from LEAs to directly provide school improvement activities or arrange for the provision of school improvement activities through other entities. OSPI did not seek approval from its LEAs to directly provide school improvement activities or arrange for the provision of school improvement activities using funds under section 1003 through OSPI's ESDs. In addition, indirect costs are not a permissible use of these funds. It is unclear if the contracts were used to provide services directly to identified schools or if the contracts supported broader initiatives and whether the SEA sought approval from the LEAs to directly provide services to identified schools.	Within 60 business days of receiving this report, OSPI must submit evidence that: <i>Allocation of ESEA Section 1003 Funds</i> - For fiscal year 2023, it has adjusted its ESEA section 1003(a) allocation amounts so that no less than 95 percent of the amount has been awarded to eligible LEAs serving schools that are identified for CSI, TSI, or ATSI consistent with statutory requirements. - It has either: - Awarded not less than 95 percent of funds reserved under ESEA section 1003 to LEAs, consistent with the requirements under ESEA section 1003(b)(1)(A) for fiscal year 2024; or - If OSPI plans to arrange for the provision of CSI, TSI, and ATSI activities under ESEA section 1111(d) through its ESDs, then OSPI must submit evidence that: - It has established a process to seek formal approval from LEAs to arrange for the provision of CSI, TSI, and ATSI activities through ESDs. - It has communicated to ESDs that have received section 1003 funds that such funds may be used only to support schools that meet statutory requirements for the identification of CSI, TSI, and ATSI schools under ESEA section 1111(c) and 1111(d)(2)(C) (i.e., ESDs may not use section 1003 funds to support any school that does not meet the ESEA's statutory definition of a CSI, TSI, or ATSI school). <i>Eligibility for ESEA Section 1003 Awards</i> - OSPI revised its methodology and applicable guidance regarding awarding funds under ESEA section 1003 to clearly indicate that LEAs may only serve schools that meet statutory requirements for the identification of CSI, TSI, and ATSI schools under ESEA section 1111(c) and 1111(d)(2)(C).
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		Finally, during the LEA performance reviews, it was confirmed that ESDs provide support to all schools (i.e., identified and non-identified schools) which is not a permissible use of ESEA section 1003 funds. OSPI did not provide evidence that it communicated to ESDs that they must use section 1003 funds to only support schools that meet statutory requirements for the identification of CSI, TSI, and ATSI schools under ESEA section 1111(c) and 1111(d)(2)(C). <i>Eligibility for ESEA Section 1003 Awards</i> ESEA section 1003(b)(1)(A) requires the SEA to allocate section 1003 funds to an LEA to serve schools that meet statutory requirements for the identification of CSI, TSI, and ATSI schools under ESEA section 1111(c) and 1111(d)(2)(C). If the State chooses to identify additional schools (e.g., if the State identifies for CSI non-Title I schools that are performing similarly to Title I schools), the SEA may only award ESEA section 1003 funds to an LEA to serve those schools that meet the statutory definition of a CSI school (e.g., the lowest-performing 5 percent of Title I schools and all schools with a graduation rate below 67 percent). The ESEA requires each State to award ESEA section 1003 school improvement funds to LEAs to support schools. As described in its ESEA consolidated State plan, OSPI identifies schools due to consistently low English learner progress as an additional statewide category of schools under ESEA section 1111(c)(4)(D)(ii). During the performance review, OSPI indicated that it awards such schools section 1003 funds. <i>ESEA Section 1003 Application Requirements</i> Under ESEA section 1003(e), an LEA must submit an application to the SEA that, at a minimum, includes the information under ESEA section 1003(e)(1)-(2), in order to receive a sub-award under ESEA section 1003(b)(1). LEAs in Washington apply for funds under ESEA section 1003 through OSPI's iGrants system.	<i>ESEA Section 1003 Application Requirements</i> 4. OSPI revised its LEA application for ESEA section 1003 funds to require a description of how the LEA will: - Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds. - Support each school developing or implementing a targeted support and improvement plan for which the LEA receives section 1003 funds. - Align other Federal, State, and local resources to carry out the activities supported with section 1003 funds. - As appropriate, modify practices and policies to provide operational flexibility, including with respect to school budgeting and staffing, that enables full and effective implementation of comprehensive or targeted support and improvement plans. 5. The revised application includes an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would receive in the absence of section 1003 funds. <i>Monitoring and Evaluating the Use of ESEA Section 1003 Funds</i> 6. OSPI has included the use of ESEA section 1003 funds as part of its CPR process (e.g., modifications to OSPI's CPR webpage and applicable guidance documents) or established a separate monitoring process for these funds.
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			While OSPI’s application includes some assurances related to monitoring schools that receive section 1003 funds and requires a description for the LEA to describe how it will monitor the progress of a school’s support and improvement plan, the following requirements are missing from OSPI’s LEA iGrants 1003 application form: A description of how the LEA will carry out its responsibilities under ESEA section 1111(d) (i.e., with respect to comprehensive and targeted support and improvement plans) for the schools it will serve with section 1003 funds, including how the LEA will— • Develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds; • Support each school developing or implementing a targeted support and improvement plan for which the LEA receives section 1003 funds; • Align other Federal, State, and local resources to carry out the activities supported with section 1003 funds; and • As appropriate, modify practices and policies to provide operational flexibility, including with respect to school budgeting and staffing, that enables full and effective implementation of comprehensive or targeted support and improvement plans. The application also does not include an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would receive in the absence of section 1003 funds. <i>Monitoring and Evaluating the Use of ESEA Section 1003 Funds</i> ESEA section 1003(b)(2)(B) requires an SEA to monitor and evaluate the use of funds by an LEA receiving an award under ESEA section 1003(b)(1)(A). During the performance review, OSPI indicated that after an application for section 1003 funds is approved, OSPI may monitor and evaluate an LEA’s use of section 1003 funds through its consolidated program review (CPR) process. However, OSPI’s CPR webpage and resources do not	
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			include that the use of section 1003 funds during the ESEA Title I, Part A portion of OSPI's CPR.	
2023 – Consolidated	School Identification ESEA § 1111(4)(D), 1111(4)(I)(iii), 1111(d)(2)(I)-(D), and 1111(d)(3)(A)(i)(II)	Washington Office of Superintendent of Public Instruction (OSPI)	Washington's approved ESEA consolidated State plan does not contain information regarding how it considers both the Title I threshold and all schools threshold when identifying schools for targeted support and improvement due to consistently underperforming subgroups (TSI). For example, page 48 of Washington's ESEA State plan states that "Washington will define consistently underperforming subgroups as any subgroup whose multiple measures score falls below the threshold set by the 'All students' comprehensive support identification." While OSPI is identifying TSI schools consistent with its approved methodology, the information quoted above does not specify that, for purposes of identifying TSI schools, OSPI uses the all schools threshold that was used to identify schools for CSI for State purposes. The Department understands that OSPI also uses the Title I threshold to identify CSI schools for purposes of identifying the lowest-performing five percent of Title I schools.	<i>Recommendations</i> The Department recommends that OSPI submit an amendment to update the information in its ESEA consolidated State plan to include the information described above (i.e., specific information regarding how both the Title I and all schools thresholds play a role in how OSPI identifies schools for TSI).
2024 – Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(d)(2)(A)-(C), and 1111(d)(3)(A)(i)(II)	Oklahoma State Department of Education (OSDE)	<i>Comprehensive Support and Improvement Schools (Lowest Performing)</i> ESEA section 1111(c)(4)(D)(i)(II) requires that the State identify not less than the lowest performing five percent of all Title I schools for comprehensive support and improvement (CSI-Low Performing). OSDE confirmed that it identified 148 schools for CSI-Low Performing in May 2023 based on data from school year 2021-2022. The State also confirmed that it identified non-Title I schools for CSI-Low Performing, reported those schools on its State and local report cards and through EDFacts as CSI (i.e., CSILOWPERF), and allocated ESEA section 1003 school improvement funds to LEAs in order to serve these non-Title I schools. (See also section 1003 School Improvement.) While the State may identify non-Title I schools based on low-performance, as described in its approved ESEA consolidated State plan, and may refer to such schools as CSI schools for State	Within 60 business days of receiving this report, OSDE must submit to the Department revised business rules so that its methodology for identifying schools for CSI-Low Performing and CSI-Not Exiting ATSI only identifies and reports Title I schools for such categories and is aligned with OSDE's approved ESEA consolidated State plan.

		purposes only, non-Title I schools do not meet the ESEA definition of a CSI-Low Performing school and, thus, should not be reported to the Department through EDFacts as CSI-Low Performing. Additionally, a school must meet the statutory definitions of comprehensive, targeted, or additional targeted support and improvement (CSI, TSI, or ATSI, respectively) to be eligible to receive ESEA section 1003 funds. Because the schools are not Title I schools, they have not met the statutory definition of CSI-Low Performing. (Note, non-Title I high schools with an ACGR below 66.7 percent must be identified for CSI; LEAs serving such high schools would be eligible for section 1003 funds.) <i>Comprehensive Support and Improvement Schools (Receiving Additional Targeted Support Not Exiting Such Status)</i> Under ESEA section 1111(d)(3)(A)(i)(II), any school that received Title I funds that was previously identified for additional targeted support and improvement (ATSI) under ESEA section 1111(d)(2)(C), and that does not meet exit criteria within a State-determined number of years, must be identified by the State for comprehensive support and improvement (CSI-Not Exiting ATSI). In Oklahoma’s approved ESEA consolidated State plan, the State indicated that it would first identify schools for CSI-Not Exiting ATSI in school year 2022-2023 based on the State’s accountability system for school year 2021-2022. OSDE submitted a list of 110 schools that were identified for ATSI in 2018 that did not exit such status based on data from school year 2021-2022. As a result of not exiting ATSI status, the State designated these schools for CSI-Not Exiting ATSI in May 2023. During the performance review, OSDE indicated that some of the schools identified for CSI-Not Exiting ATSI were not Title I schools. Specifically, OSDE “cascaded” non-Title I ATSI schools to CSI-Not Exiting ATSI, reported them as such to EDFacts, and awarded these schools ESEA section 1003 school improvement funds. This methodology is inconsistent with the statutory requirement that	
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			only Title I schools may be identified for CSI-Not Exiting ATSI. (See also section 1003 School Improvement.) While the State may identify non-Title I schools based on low-performance as CSI-Not Exiting ATSI, it may only refer to such schools as CSI schools for State purposes. Non-Title I schools do not meet the ESEA definition of a CSI-Not Exiting ATSI and, thus, should not be reported to the Department through EDFacts as CSI-Not Exiting ATSI. Further, while the State may refer to such schools as CSI schools for State purposes, the non-Title I school must also maintain ATSI status until it has met the State’s ATSI exit criteria.	
2024 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), and 1111(d)(3)(A)	Oklahoma State Department of Education (OSDE)	<i>Identifying resource inequities to be addressed in CSI and ATSI plans</i> ESEA section 1111(d)(1)(B)((4) and (d)(2)(C) requires each school identified for CSI and ATSI to develop a support and improvement plan that identifies resource inequities to be addressed through implementation of the plan. OSDE provided its CSI and ATSI plan templates (i.e., Comprehensive Improvement Plan (CIP) and Focused Improvement Plan (FIP)). The plan templates include many of the required components for a CSI, TSI, or ATSI plan, including: 1. Developed in partnership with stakeholders: The identified school is required to establish a leadership team that includes teachers, the principal, the LEA superintendent and other staff or parents to provide input in the development of the plan. 2. Informed by all indicators in the statewide accountability system: The identified school must review its Schoolwide Data Picture prior to identifying strengths and areas of need. 3. Includes evidence-based interventions: Identified schools must select evidence-based practices and interventions that align to the school’s goals and provides OSDE’s 9 Essential Elements (9EE) framework to support schools through its goal-setting process. OSDE provides a prevetted list of evidence-based providers to support LEAs in selecting interventions. However, LEAs in this performance review expressed confusion regarding their autonomy to select	Within 60 business days of receiving this report, OSDE must submit to the Department: 1. Evidence that it has updated its guidance and procedures for support and improvement plans (e.g., the plan template, State review procedures, LEA monitoring procedures) to ensure that CSI and ATSI schools identify resource inequities to be addressed through implementation of that plan consistent with the requirements in ESEA section 1111(d)(1)(B)(4) and (d)(2)(C). 2. Evidence that the SEA has implemented a monitoring protocol to review progress of implementation of CSI plans consistent with the requirement in ESEA section 1111(d)(1)(B)(vi). 3. Evidence that the State has updated its guidance and procedures (e.g., subrecipient monitoring plan, guidance to LEAs on TSI and ATSI requirements) to ensure that LEAs are meeting their obligations to review and approve TSI and ATSI plans that meet statutory requirements under ESEA section 1111(d)(2)(B) and (C), including the requirement that LEAs take additional action following unsuccessful implementation of a targeted support and improvement plan after a number of years determined by the LEA. 4. Evidence that the SEA has implemented a process (e.g., revised school support specialist handbook or guidance) for implementing more rigorous State-determined actions following unsuccessful implementation of a CSI plan,

		evidence-based interventions that were not included on the State’s list. Please see the recommendation below. 4. Based on a school-level needs assessment (for CSI only): Identified schools must complete a comprehensive needs assessment using a State template that requires the school to describe the root causes of high priority problems following the analysis of student data, collaborative leadership, and stakeholder engagement. 5. Identified resource inequities to be addressed in the plan (for CSI and ATSI only): See issue described below. 6. Approved by the school and LEA: The final support and improvement plan is submitted by the school principal to the LEA for review in OSDE’s eGrants management system. The LEA then reviews and approves TSI/ATSI plans or submits the CSI plan to OSDE for final review and approval. The “action steps” section of the CSI and ATSI plan templates require each LEA to select evidence-based interventions to address its overall needs (i.e., necessary resources). However, there is no defined component of the CSI plan review process or support and improvement plan templates that includes the requirement to identify resource inequities to be addressed through implementation of the plan. Additionally, based on the sample plans reviewed, the CSI and ATSI plans did not identify resource inequities to be addressed through implementation of the plan. <i>Monitoring</i> ESEA section 1111(d)(1)(B)(vi) requires the State to monitor and periodically review implementation of each CSI plan for each school identified by the State. The OSDE school support specialists provide technical assistance around the Oklahoma Nine Essential Elements and the school’s needs assessment; however, the monitoring protocol provided by the SEA did not include a section for monitoring implementation of CSI plans. During the review, OSDE shared that it was in the process of developing a	consistent with OSDE’s approved ESEA consolidated State plan and requirements in ESEA section 1111(d)(3)(A)(i)(I). 5. A timeline and plan for ensuring that the SEA completes the resource allocation review of each LEA serving a significant number of CSI or TSI schools, resulting in the completion of at least one resource allocation review no later than December 2024. The plan should include procedures for periodically conducting resource allocation reviews in the future, including how OSDE will determine which LEAs serve a significant number of CSI and TSI/ATSI and its general process for conducting these reviews (e.g., draft resource allocation protocol). OSDE must also provide evidence of a completed resource allocation review to resolve this action. <i>Recommendations</i> While the SEA described a process in which LEAs have autonomy in selecting evidence-based practices that best meet the LEA’s identified needs, at least one LEA thought that it was limited to only selecting evidence-based practices included on OSDE’s list of vetted providers. The Department recommends that OSDE revise its guidance on identifying evidence-based practices and the corresponding tier of evidence to clearly communicate the flexibility for LEAs to select evidence-based interventions that best address the needs identified in the support and improvement plan.
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			new protocol to monitor implementation of support and improvement plans. In addition, OSDE does not have protocols in place to ensure that LEAs are meeting statutory requirements to review and approve TSI and ATSI plans, including the requirement under ESEA section 1111(d)(2)(B)(v) that the SEA ensures LEAs take additional action following unsuccessful implementation of a targeted support and improvement plan (i.e., for schools identified for TSI or non-Title I ATSI). The LEAs indicated during the desk review that they would benefit from additional support and clarity from OSDE regarding TSI and ATSI plans. ESEA section 1111(d)(2)(C) requires each school identified for ATSI to develop and implement a school-level targeted support and improvement plan to improve student outcomes based on the indicators in the Statewide accountability system for each student group of students that was the subject of notification. The virtual charter school LEA included in the Department’s review process provided an ATSI plan that addressed the LEA overall rather than a school-level ATSI plan that addressed the needs of the specific student group that was the reason for the school’s ATSI designation. Accordingly, OSDE’s guidance, policies, and procedures are not sufficient to ensure that all LEAs develop and implement school-level ATSI plans consistent with statutory requirements. <i>More rigorous State-determined action following unsuccessful implementation of CSI plan</i> ESEA section 1111(d)(3)(A)(i)(I) requires that schools identified for CSI that have not met the State’s exit criteria within a State-determined number of years (not to exceed four years) must receive more rigorous State-determined action. OSDE identified schools for CSI-More Rigorous Intervention following unsuccessful implementation of the CSI plan or not exiting ATSI status in May 2023, based on data from school year 2021-2022. In	
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			its approved ESEA consolidated State plan, OSDE stated that following unsuccessful implementation of a CSI plan, “the CSI school will be required to adopt specific, more rigorous interventions selected by the OSDE” (p. 102). During the desk review, OSDE noted that the SEA planned to use a data tool to determine more rigorous interventions for these schools and launch a quarterly professional learning community for schools with similar identifications. At the time of this review, OSDE had not completed development of the data collection tool, implemented the learning communities for schools identified for more rigorous intervention, or required additional more rigorous State-determined actions within any of these CSI plans. <i>Resource Allocation Review</i> ESEA section 1111(d)(3)(A)(ii) requires the SEA to periodically review resource allocation to support school improvement in each LEA in the State serving a significant number of CSI, TSI, and ATSI schools. OSDE did not provide evidence that it has protocols or procedures to conduct periodic resource allocation reviews, consistent with ESEA section 1111(d)(3)(A)(ii). The Department published a dear colleague letter in July 2023 that provides guidance to States on developing their resource allocation review procedures (available at: https://oese.ed.gov/files/2023/07/DCL-Title-I-Resource-Equity-forposting.pdf).	
2024 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Oklahoma State Department of Education (OSDE)	<i>LEA Eligibility to Receive Section 1003 Funds</i> Under ESEA section 1003(b)(1)(A), LEAs with schools identified for CSI, TSI, or ATSI consistent with statutory requirements are eligible for section 1003 funds. ESEA sections 1111(c)(4)(D)(i)(II) and 1111(d)(3)(A)(i)(II) specify that only Title I schools may be identified for either CSI-Low Performing or CSI-Not Exiting ATSI, respectively. As described in the Identification of Schools section of this report, OSDE confirmed that the State identified non-Title I schools for CSI-Low Performing and CSI-Not Exiting ATSI and allocated section 1003 funds to LEAs in order to serve at least one school following the	Within 60 business days of receiving this report, OSDE must submit to the Department: 1. Evidence that it updated its policies (e.g., Guidance for Comprehensive School Improvement, School Support Specialist Handbook) to only award section 1003 funds to schools that meet the Federal school identification criteria, as required in ESEA section 1003(b)(1)(A). 2. Evidence that the State has updated its processes to ensure that it allocates not less than 95 percent of its ESEA section 1003 school improvement reservation to LEAs in any fiscal year, as required in ESEA section 1003(b)(1)(A).

			2022-2023 school year that did not meet the statutory definition for CSI. <i>Awarding Section 1003 Funds</i> ESEA section 1003(b)(1)(A) requires the State to allocate not less than 95 percent of the amount reserved under section 1003(a) for any fiscal year to make grants to LEAs to serve schools implementing CSI, TSI, or ATSI activities. Based on the documentation submitted regarding reservations and allocations for school improvement funds under section 1003 of the ESEA: • OSDE reserved \$14,836,595 in FY 2022 and \$15,726,273 in FY 2023 of its Title I funds for ESEA section 1003 school improvement. • Using those funds, in summer 2023, OSDE allocated \$29,042,683.25 in total FY 2023 and FY 2022 school improvement funds to all LEAs serving the 195 schools identified for CSI. Of that amount, OSDE indicated that it allocated \$13,316,416 in June 2023 using FY 2022 funds and \$15,726,268 in July 2023 using FY 2023 funds. • Accordingly, it appears that OSDE allocated approximately 90 percent of its FY 2022 funds and 100 percent of its FY 2023 section 1003 funds to LEAs to support schools implementing CSI plans. Thus, OSDE’s procedures were inconsistent with the requirement in ESEA section 1003(b)(1)(A). Because the State combined the funding from two fiscal years to award subgrants in summer 2023, and the State overall awarded 95 percent of the funds to LEAs, no corrective action is needed with respect to these sub-awards. It is important that the State’s policies going forward clearly identify that 95 percent of any fiscal year’s section 1003 funds are allocated to LEAs. <i>Uses of Section 1003 Funds and Monitoring of LEAs</i> ESEA section 1003(b)(2)(B) requires the SEA to monitor and evaluate the use of funds by LEAs receiving an allotment of ESEA	3. Evidence that the SEA has implemented a monitoring protocol to evaluate LEAs’ use of ESEA section 1003 funds, including procedures for virtual charter LEAs. 4. Evidence (e.g., application template, guidance) that it requires each LEA to submit an application to the SEA consistent with the requirements in ESEA section 1003(e). <i>Recommendation</i> After OSDE has updated its policies and procedures for school support and improvement to align with statutory requirements, the Department recommends that OSDE provide clearer guidance regarding LEA and school responsibilities regarding school improvement activities, such as school improvement plans and ESEA section 1003 funds (i.e., revised Guidance for Comprehensive School Improvement and School Support Specialist Handbook).
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		section 1003 funds. OSDE conducts fiscal monitoring through its grants management system and captures expenditures and reimbursement requests through the Oklahoma Cost Accounting System (OCAS). The State reported that OSDE’s school support specialists approve the ESEA section 1003 budget (i.e., 515 Project budget) and check that the budget aligns with the interventions included in the support and improvement plan. However, the State does not have a formal process for monitoring and evaluating LEAs’ use and implementation of activities funded by section 1003 funds. The lack of oversight procedures was particularly notable when reviewing documentation provided by the virtual charter LEA. This LEA has one CSI-low graduation rate high school and one ATSI elementary school. While OSDE indicated that only CSI schools are eligible to be served with ESEA section 1003 funds, the reimbursement documentation provided by the virtual charter LEA included invoices and approved ESEA section 1003 reimbursements for services provided to the elementary school (i.e., an ATSI school). This is inconsistent with OSDE’s intended use of section 1003 funds, which is to serve schools implementing CSI plans. <i>Section 1003 Application</i> Under ESEA section 1003(e), an LEA must submit an application to the SEA that describes how the LEA will: 1. Develop comprehensive support and improvement plans under ESEA section 1111(d)(1) for schools receiving funds; 2. Support schools developing or implementing targeted support and improvement plans under ESEA section 1111(d)(2), if applicable; 3. Monitor schools receiving funds; 4. Use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner;	
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			5. Align other Federal, State, and local resources to carry out the activities supported with funds; and 6. As appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans. OSDE requires its LEAs to submit a 515 Project budget on behalf of each school identified for CSI. As noted above, the State school improvement specialists review each 515 Project budget to check that the budget aligns to the school’s support and improvement plan. OSDE staff also review each reimbursement request to ensure alignment with the budget and support and improvement plan. However, the State does not require LEAs to submit an application that describes how the LEA will meet each of the ESEA requirements described in section 1003(e).	
2024 - Consolidated	Identification of Schools ESEA § 1111(c)(4)(D), 1111(d)(2)(A)-(C), and 1111(d)(3)(A)(i)(II)	Maryland State Department of Education (MSDE)	<i>Targeted Support and Improvement: Consistently underperforming student group(s) (TSI)</i> For TSI, a State must identify any public school (Title I and non-Title I) with one or more student group(s) that meet the State’s definition of consistently underperforming based on all indicators in the State’s system of annual meaningful differentiation. MSDE confirmed that it annually identifies any school with one or more underperforming student groups, which is defined as a student group that does not meet its school-level measurements of interim progress over two years based on the indicators in the State accountability system for which MSDE establishes long-term goals (e.g., academic achievement, graduation rate, and progress achieving English language proficiency) for TSI. As MSDE does not include all accountability indicators in its TSI identification methodology, its methodology is inconsistent with ESEA requirements (pgs. 42-43). <i>Notification of LEAs with Identified Schools</i> ESEA section 1111(d)(1)(A) and (2)(A) requires a State to notify LEAs of any school it serves that is identified for CSI, TSI, or ATSI. The submitted documentation indicates that MSDE	Within 60 business days of receiving this report, MSDE must submit an amendment to its ESEA consolidated State plan that revises its methodology for identifying schools for TSI to consider all indicators in the State’s system of annual meaningful differentiation consistent with ESEA section 1111(c)(4)(C)(iii). After MSDE makes accountability determinations in fall 2024 and no later than December 2024, MSDE must submit to the Department evidence that MSDE identified schools for TSI consistent with ESEA section 1111(c)(4)(C)(iii) and notified LEAs serving such schools consistent with ESEA section 1111(d)(2)(A). <i>Recommendation</i> The Department recommends that MSDE update its notification timeline to ensure all LEAs serving identified schools receive notification as early as possible and no later than December to ensure meaningful implementation of school improvement requirements under ESEA section 1111.

			provided notification to LEAs serving schools identified for CSI or ATSI in March 2023 (for identification that should have occurred in fall 2022 based on data from the 2021-2022 school year) and notified CSI schools directly in August 2023, almost a full year after the State should have run its accountability system. In addition to not providing timely notification, MSDE also excluded schools identified for TSI from its notification to LEAs. It did not notify any LEA that it served one or more schools that were identified for TSI. Further, during the desk review, MSDE indicated that it expects the LEA to notify each identified school of its status, but MSDE provided no evidence that it shared this expectation with LEAs or that it ensured this occurred in a timely manner.	The Department further recommends the MSDE update its notification materials and guidance to LEAs to clarify that LEAs must notify a school of its identification status.
2024 – Consolidated	Support for School Improvement ESEA § 1111(d)(1)-(2), 1111(d)(3)(A), and 8101(21)(B)	Maryland State Department of Education (MSDE)	<i>Support and Improvement Plan Development</i> ESEA sections 1111(d)(1)(B) and (d)(2)(B) requires that each school identified for CSI, TSI, or ATSI develop a support and improvement plan in partnership with stakeholders (including principals and other school leaders, teachers, and parents). MSDE provided no evidence that it requires support and improvement plans (i.e., Implementation Plans) be developed in partnership with stakeholders. ESEA sections 1111(d)(1)(B)(i) and (d)(2)(B)(i) require each school identified for CSI, TSI, or ATSI to develop a support and improvement plan that is informed by all indicators in the State’s accountability system. MSDE provided documentation that demonstrated each Implementation Plan considers a subset of the indicators in its approved accountability system. However, MSDE does not require that each support and improvement plan is informed by all indicators. Specifically, the submitted evidence did not demonstrate that support and improvement plans consider the Other Academic indicator (i.e., Academic Progress – Student Growth), Progress in achieving English language proficiency indicator or School Quality or Student Success indicators including Access to Well Rounded Curriculum, Maryland School	Within 60 business days of receiving this report, MSDE must submit: 1. Evidence (e.g., revised guidance, frequently asked questions, or Implementation Plan template) that MSDE modified its policies to ensure schools identified for CSI, TSI, or ATSI meet the requirement to develop support and improvement plan in partnership with stakeholders, including principals and other school leaders, teachers, and parents. 2. Evidence that MSDE update its Implementation Plan template for CSI, TSI, and ATSI plans to be informed by all indicators in the State’s ESEA accountability system to include Academic Progress - Student Growth, Progress in achieving English language proficiency, Access to Well Rounded Curriculum, Maryland School Survey, On Track for 9th Grade, and Credit for Well Rounded Curriculum. 3. Plan for ensuring MSDE monitors and periodically reviews the implementation of comprehensive support and improvement plans. 4. Evidence that MSDE ensures each LEA reviews targeted support and improvement plans before approval (e.g., revised monitoring protocol and communication to LEAs). 5. A timeline and plan for ensuring that MSDE completes the resource allocation review of each LEA serving a significant

			Survey, On Track for 9th Grade, and Credit for Well Rounded Curriculum. <i>Monitoring Support and Improvement Plans</i> ESEA section 1111(d)(1)(B)(vi) requires a State to monitor and periodically review the implementation of CSI plans after approval. The submitted documentation provides evidence that, prior to 2022, MSDE monitored implementation of CSI plans. The submitted documentation also demonstrated that MSDE conducted site visits in the 2023-2024 school year to conduct targeted technical assistance on specific topics (e.g., data cycles and analysis). However, MSDE stated that it did not monitor the implementation of CSI plans (i.e., Implementation plans) during those visits. ESEA section 1111(d)(2)(B) requires an LEA serving identified schools to review and approve targeted support and improvement plans (i.e., for schools identified for TSI or ATSI) and to monitor implementation of targeted support and improvement plans. The submitted documentation shows that MSDE provides guidance that states reviewing, approving, and monitoring targeted support and improvement plans are the responsibilities of LEAs. However, MSDE stated that it does not have a process (e.g., monitoring) to ensure LEAs implement these requirements. <i>Resource Allocation Review</i> ESEA section 1111(d)(3)(A)(ii) requires a State to periodically conduct a resource allocation review to support school improvement in each LEA in the State serving a significant number of schools identified for CSI, TSI, and ATSI. MSDE provided evidence that it monitors monthly spend-down reports from each LEA and requires LEAs serving one or more CSI school to conduct an analysis of inequities within identified schools when conducting a needs assessment to inform each CSI school's support and improvement plan. Please note that a State must itself conduct the resource allocation review; this process of	number of identified schools resulting in the completion of at least one resource allocation review no later than December 2025. The plan should include procedures for periodically conducting resource allocation reviews in the future, including how MSDE will determine which LEAs serve a significant number of identified schools (i.e., CSI, TSI, and ATSI) and its general process for conducting these reviews (e.g., draft resource allocation protocol). MSDE must also provide evidence of a completed resource allocation review to resolve this action.
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			LEA review of resource allocation (i.e., completing a self-assessment protocol provided by the State for purposes of school support and improvement plans) without any further analysis by the State does not meet requirements. During the desk review, MSDE indicated that it has not yet conducted a resource allocation review and is working to implement this requirement.	
2024 – Consolidated	1003 School Improvement ESEA § 1003(a)-(f) and 1111(d)(1)-(2)	Maryland State Department of Education	ESEA section 1003(e) requires each LEA that receives ESEA section 1003 funds to submit an application to the State. Each application must include, at a minimum— • a description of how the LEA will carry out its responsibilities under section 1111(d) for schools receiving funds under this section, including how the LEA will— ○ develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds under this section; ○ support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if funds received under this section are used for such purpose; • monitor schools receiving funds under this section, including how the LEA will carry out its responsibilities under clauses (iv) and (v) of section 1111(d)(2)(B) if funds received under this section are used to support schools implementing targeted support and improvement plans; • use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the LEA will partner; • align other Federal, State, and local resources to carry out the activities supported with funds received under subsection (b)(1); and • as appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans described in paragraphs (1) and (2) of section 1111(d); and	Within 60 business days of receiving this report, MSDE must provide a final section 1003 application template that is updated to include all elements required under ESEA section 1003(e) with LEAs for the 2024-2025 school year.

			• an assurance that each school the LEA proposes to serve will receive all of the State and local funds it would have received in the absence of funds received under this section. The submitted section 1003 application template does not include any of the required elements and MSDE provided no evidence that it reviews for the required elements during the application approval process. During the desk review, MSDE confirmed that it does not include the required elements in its section 1003 application. However, MSDE provided a draft section 1003 application which includes all required elements.	
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