



Identifying the Nation's Lowest Performing Schools: Shifts Following the Passage of the Every Student Succeeds Act (ESSA)

> NCEE 2025-001a U.S. DEPARTMENT OF EDUCATION

A Publication of the National Center for Education Evaluation at IES







U.S. Department of Education

Miguel Cardona Secretary

Institute of Education Sciences

Matthew Soldner

Acting Director

National Center for Education Evaluation and Regional Assistance

Matthew Soldner Marsha Silverberg
Commissioner Associate Commissioner

Meredith Bachman Thomas Wei

Project Officer K-12 Branch Chief

The Institute of Education Sciences (IES) is the independent, nonpartisan statistics, research, and evaluation arm of the U.S. Department of Education. The IES mission is to provide scientific evidence on which to ground education practice and policy and to share this information in formats that are useful and accessible to educators, parents, policymakers, researchers, and the public.

We strive to make our products available in a variety of formats and in language that is appropriate to a variety of audiences. You, as our customer, are the best judge of our success in communicating information effectively. If you have any comments or suggestions about this or any other IES product or report, we would like to hear from you. Please direct your comments to ncee.feedback@ed.gov.

This report was prepared for IES under Contract No. 919990019F0396 by the American Institutes for Research. The content of the publication does not necessarily reflect the views or policies of IES or the U.S. Department of Education nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.

October 2024

This report is in the public domain. While permission to reprint this publication is not necessary, it should be cited as:

Le Floch, K. C., Hurlburt, S., Atchison, D., & Hyland, K. (2024). *Identifying the nation's lowest performing schools: Shifts following the passage of the Every Student Succeeds Act (ESSA)* (NCEE 2025-001a). U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance. http://ies.ed.gov/ncee

This report is available on the Institute of Education Sciences website at http://ies.ed.gov/ncee.



Identifying the Nation's Lowest Performing Schools: Shifts Following the Passage of the Every Student Succeeds Act (ESSA) Appendix

October 2024

Kerstin Carlson Le Floch Steven Hurlburt Drew Atchison Katie Hyland American Institutes for Research

Contents

INTRODUCTION	ON3
APPENDIX A.	BACKGROUND ON ACCOUNTABILITY UNDER NCLB, WAIVERS, AND ESSA 4
A.1 No Ch	ild Left Behind4
	rs to NCLB Accountability Requirements
A.3 Every	Student Succeeds Act
APPENDIX B.	METHODS
	ources
	ach to Conducting Descriptive Analyses22
B.3 Appro	ach to Conducting Policy Document Review
APPENDIX C.	SUPPORTING DETAILS FOR KEY FINDINGS24
ENDNOTES	
REFERENCES	54
List of Ex	chibits
Exhibit A.1.	Accountability policies under three federal policies10
Exhibit A.2.	Selected elements of school accountability systems under ESSA, by state 14
Exhibit A.3.	Details on measures of school quality and student success, by state 16
Exhibit B.1.	Data sources, including the sample, timing of data collection, and information obtained from each source
Exhibit B.2.	School characteristics variables used and percentage missing for each variable 21
Exhibit B.3.	Academic performance and outcome variables used, and percentage missing for each variable
Exhibit C.1.	Change in the number of schools identified for the most intensive support, overall and by waiver status and state, 2016-17 (pre-ESSA) to 2018-19 (ESSA)25
Exhibit C.2.	Number and percentage of Title I schools identified for the most intensive support, by waiver status and state, 2016-17 (pre-ESSA) and 2018-19 (ESSA)28
Exhibit C.3.	Number and percentage of schools identified for the most intensive support, by waiver status, 2004-05 to 2018-19

Exhibit C.4.	Percentage of newly identified CSI high schools, by Title I status and 2018-19 4-year graduation rate
Exhibit C.5.	Achievement decile distribution in English language arts and mathematics among schools no longer identified for the most intensive support after ESSA implementation
Exhibit C.6.	Change in the percentage of schools identified for the most Intensive support, by waiver status and school characteristic, 2016-17 (pre-ESSA) to 2018-19 (ESSA)34
Exhibit C.7.	Number of schools identified for the most intensive support, by waiver status, state, and school characteristic, 2018-19 (ESSA)
Exhibit C.8.	Number of schools identified for the most intensive support, by waiver status, state, and school characteristic, 2016-17 (pre-ESSA)
Exhibit C.9.	Intersection of alternative, high, small, and charter schools among schools newly identified for the most intensive support
Exhibit C.10.	Percentage of schools identified for the most intensive support that were in the bottom 5 percent for English language arts and mathematics proficiency, by waiver status and state, 2016-17 (pre-ESSA) and 2018-19 (ESSA)
Exhibit C.11.	Achievement decile distribution in English language arts and mathematics among schools identified for the most intensive support, by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)
Exhibit C.12.	Percentage of schools in the bottom 5 percent for English language arts and mathematics proficiency that were identified for the most intensive support, by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)
Exhibit C.13.	Number of schools identified for the most intensive support, by waiver status, state, and concentration of low-income students and students of color, 2016-17 (pre-ESSA)
Exhibit C.14.	Number of schools identified for the most intensive support, by waiver status, state, and concentration of low-income students and students of color, 2018-19 (ESSA)
Exhibit C.15.	Percentage of schools identified for the most intensive support, by concentration of low-income students, overall and by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)
Exhibit C.16.	Percentage of schools identified for the most intensive support with high concentrations of low-income students and students of color, by waiver status and state, 2016-17 and 2018-19

INTRODUCTION

For more than two decades, federal law has required states to identify schools failing to provide students with a high-quality education and has led to substantial debate about how best to do so. Appropriately identifying the lowest performing schools matters because it allows states and local education agencies to target limited resources for school improvement to where they are needed most. The Every Student Succeeds Act (ESSA) of 2015 sought to address perceived problems with school accountability systems under prior federal law. ESSA provided states with increased flexibility in how they design their *annual evaluation of school performance*. It also introduced new requirements for states' subsequent *identification of schools for the most intensive support*, now designated as those needing Comprehensive Support and Improvement (CSI), in part, to allow states to focus on a smaller set of the lowest performing schools.

This study examines state identification of schools for the most intensive support to see how changes in federal laws and regulations played out nationally and at the state level, by comparing schools identified just before and just after ESSA's implementation. Specifically, it looks at two time points: 2016-17, during which there were two distinct policy contexts, with most states operating under waivers but seven states still operating under the previous No Child Left Behind policies, and 2018-19, when all states were expected to be following ESSA regulations for the first time. Of particular interest is whether the number and characteristics of identified schools—including their average student achievement and demographics—differed when comparing the set of schools identified under ESSA with the set of schools identified just before ESSA.

These appendices provide supporting details on the policy being evaluated, the study methods, and supplementary analyses for the findings presented in the main body of the report.

APPENDIX A. BACKGROUND ON ACCOUNTABILITY UNDER NCLB, WAIVERS, AND ESSA

During the past 20 years, three successive federal policy contexts have set the framework for how states hold schools accountable for their performance. These policies include the No Child Left Behind Act of 2001 (NCLB); the waivers to NCLB accountability requirements, introduced in 2011; and the Every Student Succeeds Act of 2015 (ESSA). This appendix provides a narrative description of each policy, followed by a summary table (Exhibit A.1), which highlights the similarities and differences in terms of how schools were evaluated annually and identified for the most intensive support. This appendix also provides an overview of selected accountability features, by state (Exhibit A.2), and details on states' measures of school quality under ESSA (Exhibit A.3) to illustrate state variation for readers seeking additional details.

A.1 No Child Left Behind

In 2001, the Elementary and Secondary Education Act of 1965 (ESEA) was reauthorized as NCLB.

Annual Evaluation of School Performance Under NCLB

NCLB required states to develop and implement an accountability system to evaluate the performance of all public schools on an annual basis. Key policy features under NCLB included the following:

- Accountability goals: The overarching goal of the NCLB accountability requirements was for all students to attain proficiency in reading and mathematics by the 2013-14 school year (Pub. L. 107-110). To ensure that all schools made steady progress toward 100 percent proficiency, states set annual targets for school-level "adequate yearly progress" (AYP). The law granted states the flexibility to set their own annual targets, as long as they ended with 100 percent proficiency in each subject by 2013-14.
- Indicators of school performance: To determine AYP, NCLB required states to measure the percentage of students performing at or above the proficient level on statewide assessments in reading and mathematics, student participation rates in reading and mathematics assessments, and at least one other academic indicator. For high schools, the other indicator was required to be graduation rate. For elementary and middle schools, states were allowed to choose their own indicators, such as attendance rate or state tests in a subject other than reading or mathematics.
- Annual designations: AYP was a pass/fail system. To make AYP, schools had to meet annual performance targets in reading and mathematics for every relevant group of students (English learners, students with disabilities, low-income students, and major racial and ethnic groups) and for the school as a whole. Schools also had to assess at least 95 percent of students overall and for each relevant group of students, and fulfill the other academic indicator. Failure to meet one or more of these indicators—even for one group of students—resulted in the school not making AYP.
- **Minimum number of students:** To ensure the accuracy of AYP determinations while protecting the privacy of students, NCLB required that states establish a minimum number of students in a school or student group to be included in standard accountability rules (often described as the "minimum *n*"). For the first several years that NCLB was in effect, states were allowed to set a different minimum number of students for individual groups of students (for example, 40 for the English learners and students with disabilities groups, and 30 for other groups of students).

However, starting in July 2007, the U.S. Department of Education (ED) prohibited states from establishing a different minimum number of students for individual groups of students, thus requiring states to establish a uniform minimum number for each group of students. When an individual group of students did not meet the minimum n, the state would not hold the school accountable for the performance of that group. If a school did not have enough students to meet the minimum n for the entire school, it would be considered under the state's rules for schools in special circumstances (see below).

• **Rules for schools in special circumstances:** NCLB allowed states to use different accountability rules for certain categories of schools, such as public schools with atypical grade configurations, public schools that service special populations (such as alternative schools, juvenile institutions, or state public schools for the blind), very small schools, and public schools with no tested grades. For example, if schools were too small to meet the minimum *n*, states could opt to aggregate test scores over multiple years until there were sufficient scores to meet the minimum *n*; or in the case of a K-2 school with untested grades, the AYP rating of the school in which the K-2 students would attend third grade would be attributed to the K-2 school.

Identification of Schools for the Most Intensive Support Under NCLB

NCLB required states to annually identify Title I schools³ for support if they did not make AYP for two consecutive years, and to establish a statewide system of support to build the capacity of low-achieving schools. Under NCLB, there were five increasingly intensive stages of identification for support based on the number of years that a school did not make AYP targets. For example, all Title I schools that did not make AYP for at least four years were identified for corrective action or restructuring. Schools in corrective action or restructuring status were subject to the most stringent interventions, relative to schools that missed AYP targets for only two or three years. Schools identified for corrective action were required to select from a menu of required actions, which included, for example, replacing teachers relevant to the school's failure to meet annual targets or implementing a new curriculum. NCLB also included a menu of interventions for schools identified for restructuring that included changing the governance structure or replacing the principal. In this report, schools identified for corrective action or restructuring are described as those "targeted for the most intensive support" because these designations were the most intensive that a low-performing school could receive under NCLB.

While this report focuses on schools identified for corrective action or restructuring, it is important to acknowledge that under NCLB there were other strategies meant to focus attention on persistently low-achieving schools, in particular the School Improvement Grant (SIG) program. This discretionary grant program authorized ED to distribute appropriated funds to states based on their Title I allocation. States then had to award SIG funds to districts with eligible low-achieving schools. SIG began as a relatively small program, with Congress funding it for the first time in 2007 at \$125 million. However, SIG became a centerpiece program in 2009 when the American Recovery and Reinvestment Act (ARRA) infused \$3 billion to supplement Congress's regular appropriations for SIG, which totaled approximately \$3.1 billion between 2009 and 2014.

Despite the SIG program's importance in the years leading up to the waivers and passage of ESSA, this report focuses only on schools with corrective action and restructuring designations when examining

schools identified for the most intensive support under NCLB.⁵ Although all states and many districts and schools sought to participate in the SIG program, it was ultimately voluntary, as opposed to the mandatory accountability systems that are the focus of this report. Still, it is important to acknowledge the SIG program's role in focusing federal policies on supporting the nation's persistently low-achieving schools and as the proving ground for various policy levers (for example, targeting the lowest achieving 5 percent of schools) that were emulated under the subsequent NCLB waivers and ESSA, as described in the next few sections.

A.2 Waivers to NCLB Accountability Requirements

ESEA was scheduled for revision in 2007 but because Congress had not done so by 2011, ED introduced flexibility from specific accountability requirements of NCLB. This flexibility, which became known as the "waivers," was intended to address perceived concerns with NCLB, most notably the increasing number of schools failing to make AYP as annual targets increased over time. Policymakers and administrators also expressed concern about NCLB's heavy emphasis on the percentage of students scoring proficient based on standardized testing in math and reading, and the pass/fail rating system under which missing just one indicator resulted in a school not making AYP. ^{6,7,8} All but one state (Montana) requested waivers, and by June 2015, 43 states, the District of Columbia, and Puerto Rico had been granted waivers. Two state requests were ultimately rejected (California and Iowa), and four other states (Nebraska, North Dakota, Vermont, and Wyoming) withdrew their requests.

Annual Evaluation of School Performance Under the Waivers

The waivers maintained some aspects of NCLB's requirements for the annual evaluation of school performance, while altering and expanding specifications in several key ways.

- Accountability goals: Instead of the NCLB timeline requiring 100 percent proficiency by 2014, states could set their own long-term goals and targets for reaching these goals. Under the waivers, states were provided three options for establishing annual targets toward long-term goals: (a) set targets in annual equal increments toward the goal of reducing by half the percentage of students who were not proficient within six years; (b) set targets in annual equal increments toward the goal of having 100 percent of students reach "proficiency" by 2020; or (c) use another method that would result in "ambitious but achievable" goals and be approved by ED. In contrast to NCLB, under the waivers states could set different goals for individual schools, based on the school's performance, as long as the state required greater gains for schools that were further behind.
- Annual designations: The waivers enabled states to cease measuring AYP within the strict parameters of NCLB, which required assigning each school an overall pass/fail designation. Under the waivers, states could establish annual ratings that reflected varied levels of school performance (for example, an index score, letter grades A-F, or a descriptive term, such as "exemplary"), although they were no longer required to generate a *summative* annual rating for each school. (A summative rating is an overall rating that aggregates all indicators into a single accountability label.)
- **Indicators of school performance**: The waivers continued to require use of student achievement in reading and mathematics and graduation rates as indicators of school performance but added *change in student achievement* in reading and mathematics over time (that

is, student growth) as new accountability indicators. In addition, states were provided flexibility in how indicators were combined and weighted to evaluate overall school performance, and were allowed to include results from tests in other academic subjects besides reading and mathematics.

- **Minimum number of students**: The waivers maintained NCLB's requirement to set a minimum number of students in a school or individual student groups to be included in standard accountability rules. However, federal guidance under the waivers permitted states to combine groups of students into larger, composite groups, which became known as "super subgroups." ¹⁰
- Rules for schools in special circumstances: The waivers also maintained NCLB's flexibility to use different accountability rules for schools in special circumstances.

Identification of Schools for the Most Intensive Support Under the Waivers

The waivers altered the categories of schools identified for improvement as well as the frequency and criteria for identifying such schools. Under the waivers, states were required to identify and support two types of Title I schools (and non-Title I schools, if states chose to do so). In contrast to NCLB, which required annual designations for schools that needed support, the waivers did not require states to update their lists of identified schools annually.

- **Priority schools:** Relative to NCLB, the waivers focused more on providing the most intensive support to the very lowest performing schools. Specifically, schools that were among the lowest performing Title I schools in the state *based on the performance of all students* and, at the high school level, those with a graduation rate less than 60 percent could be identified as priority schools. Priority schools also included schools that had received SIG funding. At a minimum, each state had to identify at least 5 percent of their Title I schools as priority schools. In addition to the 5 percent of Title I priority schools, states could opt to designate their lowest achieving non-Title I schools as priority schools. Under the waivers, federal policies moved away from NCLB's list of required actions, instead allowing states and districts to determine activities that they believe would best support improvement in priority schools. Priority schools are a focus of the analyses in this report as they represent the set of schools identified as needing the most intensive support under the waivers.
- **Focus schools:** The waivers shifted how the performance of student groups was considered in accountability systems. Unlike NCLB, where the performance of individual student groups affected annual AYP determinations for each school, the waivers required states to separately identify Title I schools with low-performing student groups (as defined by the state) and designate them as focus schools. Waiver guidelines required the total number of focus schools in a state to equal at least 10 percent of all Title I schools in the state. States could opt to identify non-Title I schools as focus schools, in addition to the 10 percent of Title I schools in the state. Focus schools are not separately analyzed in this report as they did not constitute schools that were intended by law to receive the most intensive support.

A.3 Every Student Succeeds Act

In December 2015, Congress reauthorized ESEA as ESSA and, in doing so, shifted state systems of school accountability, identification, and support in some fundamental ways by returning significant responsibility to states and districts.

Annual Evaluation of School Performance Under ESSA

As with prior policies, ESSA continues to require that states evaluate school performance each year (in the law, this is described as *annual meaningful differentiation*), but with some modifications.

- Accountability goals: States must establish ambitious long-term goals and interim progress targets for academic proficiency, graduation rates, and progress of English learners on assessments of English proficiency. SESSA differs from prior policies in that states have relative autonomy with regard to the number of interim progress measures and the timeline to reach long-term objectives. In addition to setting goals for all students, states must set goals for each federally required specific group of students and may establish varying goals by school level or grade band. Goals for specific student groups who are behind their peers must take into account the improvement necessary to make progress in closing statewide differences in student performance.
- Annual designations: As was the case under prior policy, ESSA requires states to evaluate school performance annually and to use that evaluation process to determine which schools are identified for additional support. However, while states have to annually evaluate and report on school performance in a manner that ensures "meaningful differentiation," ESSA does not require states to assign each school an overall designation. ¹⁴ Similar to the waivers, ESSA allows states to determine if they assign summative ratings or not, and, if they do, whether these are a letter grade (A-F), an index score, or a descriptive term, such as "exemplary" (see Exhibit A.2).
- **Indicators of school performance**: ESSA requires inclusion of the following five accountability indicators:
 - Student achievement in reading and math¹⁵
 - A state-selected academic indicator for elementary and middle schools (for example, student growth in reading and math achievement)
 - Graduation rate (for high schools)
 - English language proficiency progress for English learners
 - School quality or student success (see examples in Exhibit A.3)

ESSA extends substantial leeway to states in how these indicators are measured. For example, states can choose from a wide variety of measures for the school quality or student success indicator, including measures of college and career readiness, chronic absenteeism, school climate, or on-track to graduation. ESSA also allows states to include results from tests in academic subjects in addition to reading and math. Moreover, states have flexibility to decide how to combine and weight these measures, potentially changing their relative emphases and influencing which schools are identified for supports. (See Exhibit A.2 for state-level information on weights, tested subjects, and other accountability measures.)

• Minimum number of students: Similar to prior policy, ESSA requires states to establish the minimum number of students in each school and group of students that states determine is necessary for accurate calculations while protecting the privacy of students (see Exhibit A.2). Also similar to prior law, ESSA requires states to set the same minimum number for each school and for each group of students. However, federal regulations (later rescinded) encouraged that this number be no greater than 30 students for the school as a whole and for each specific student group.

• Rules for schools in special circumstances: Similar to prior policies, ESSA allows states to use different accountability rules for schools in special circumstances. These schools may include (1) schools in which no grade level is tested on state assessments (for example, PK-2 schools); (2) schools with less typical grade configurations (for example, K-12 schools); (3) small schools that do not meet the minimum number of students to be included in standard accountability rules; (4) schools that are designed to serve special populations (for example, alternative schools, juvenile facilities, or schools for recently arrived English learners); and (5) newly opened schools for which multiple years of data are not available. However, federal guidance encourages states to use these different accountability rules sparingly, and various policy documents released by ED discuss that standard accountability rules should be used for all schools. ¹⁶

Identification of Schools for the Most Intensive Support Under ESSA

Building on the waivers, ESSA created three groups of schools to be identified for additional support. Similar to the waivers, the first group focuses on the performance of all students.

• Comprehensive Support and Improvement (CSI): Under ESSA, CSI schools include the lowest performing 5 percent of the state's Title I schools and *all* public high schools that fail to graduate 67 percent of their students (a change from 60 percent under the waiver policy). As was the case with the waivers, if states choose to include non-Title I schools among those identified as CSI, these schools must be in addition to the lowest 5 percent of Title I schools. ¹⁷ Hence, the number of CSI schools may be more or less than 5 percent of *all* public schools in the state because states may identify more schools than required, including non-Title I schools, and because the graduation rate requirement is an absolute rather than a relative threshold (see Exhibit A.2). Because CSI schools are identified for the most intensive support, these schools are a focus of the analyses in this report.

In addition, ESSA added two categories of schools to be targeted for support based on the performance of specific groups of students. These categories of schools do not represent the categories intended to receive the most intensive support and thus are not a focus of this study.

- Targeted Support and Improvement (TSI): These schools do not meet the criteria to be
 designated as CSI based on overall performance but have one or more groups of students that are
 persistently low-performing, as defined by the state based on the same set of indicators used to
 identify CSI schools.
- Additional Targeted Support and Improvement (ATSI): These schools are those in which the performance of any specific group of students in the school meets the threshold for being in the lowest performing 5 percent of all Title I schools in the state (that is, the cutoff for being designated as a CSI school).

Exhibit A.1. Accountability policies under three federal policies

	Changes	in the Elementary and Secondary Education Act	
Federal Policy	No Child Left Behind Act	Waivers	Every Student Succeeds Act
Step 1: Annual	Evaluation of School Performance		
Long-term goals	States are required to have the same goal (100% proficiency in reading and math) and timeline (by 2014).	States had three options for establishing long-term goals: (a) set targets in annual equal increments toward the goal of reducing by half the percentage of students who were not proficient within six years; (b) set targets in annual equal increments toward the goal of having 100 percent of students reach "proficiency" by 2020; or (c) use another method that results in ambitious but achievable goals and approved by ED.	States develop long-term goals and timeline for achieving them. Goals are required to be "ambitious but achievable," subject to ED approval. Goals may be established for each group of students, taking into account progress necessary to reduce achievement gaps.
School ratings	States are required to give schools one of two ratings (pass/fail): made AYP) or did not make AYP.	States are required to differentiate varied levels of school performance. For example, states often measured and described school performance through an index. An index combines multiple indicators of school performance in a way that provides a single number (or in some cases, a letter grade) that summarizes how a school is doing.	States must establish a system of "annual meaningful differentiation" to assess the overall performance of each school. Most states used an index to generate annual summative ratings for all schools—for example, A-F letter grades. However, summative ratings are not required; some states provide a "dashboard" with multiple pieces of information about school performance and no single rating.
Indicators of school performance	Student <i>proficiency</i> in reading and math is required.	Student <i>proficiency</i> in reading and math is required.	A state-selected measure of student <i>achievement</i> in reading and math is required, which should include proficiency but also may include other measures (for example, academic growth). ^a
	Test participation is required (at least 95% of students must take reading and math tests).	A separate test participation indicator is not required. (But, according to ED guidance, "SEAs [state education agencies] and LEAs [local education agencies] would continue to report participation rate separately and a subgroup would not be able to make its AMOs [Annual Measurable Objectives] unless it has at least a 95 percent participation rate.")	A separate test participation indicator is not required. But ED's fact sheet explains that "the law requires that all students take statewide assessments and that states factor into their accountability systems participation rates for all students or subgroups of students")
	A state-selected other "academic" indicator is required (for example, attendance for elementary and middle schools).	Other indicators are permitted but not required.	A state-selected "school quality or student success" indicator is required (for example, chronic absenteeism or school climate). ^b

	Changes	in the Elementary and Secondary Education Act	
Federal Policy	No Child Left Behind Act	Waivers	Every Student Succeeds Act
	High school graduation rate is required.	High school graduation rate is required.	High school graduation rate is required.
	Student growth in proficiency is not a required indicator. ^c	A state-selected indicator of change in performance is required (for example, student growth).	A state-selected indicator of "academic progress" is required for elementary and middle schools. This could include student growth, but other measures could include reductions in grade-to-grade retention rates, shifts in enrollment in gifted and talented programs, or participation in Advanced Placement courses.
	English language proficiency for English learners is not a required indicator.d	English language proficiency for English learners is not a required indicator.	English language proficiency <i>progress</i> for English learners is required.
Use of indicators to rate performance	States are required to rate a school as "did not make AYP" if it did not meet one or more indicators.	States choose how indicators are combined to rate school performance.	States choose how indicators are combined to rate school performance.
Inclusion of specific groups of students in school ratings	States are required to assess AYP for federally specified student groups in each school. If any one group "did not make AYP," states must rate the school as "did not make AYP."	States are required to include specific groups of students in evaluation of school performance, but which groups and method of inclusion is up to states.	States are required to include specific groups of students in evaluation of school performance, but which groups and method of inclusion is up to states.
Minimum number of students needed for "standard" accountability rules	States choose a minimum number of students in a school or in a group of students for standard accountability rules to apply.	States choose a minimum number of students in a school or group of students to be included in standard accountability rules.	Similar to prior policy. However, federal regulations (later rescinded) encouraged this number to be no greater than 30 students.

	Changes	in the Elementary and Secondary Education Act	
Federal Policy	No Child Left Behind Act	Waivers	Every Student Succeeds Act
Rules for schools in special circumstances	States choose how to evaluate school performance for small schools, those without tested grades, or those in other unique circumstances.	States choose how to evaluate school performance for small schools, those without tested grades, or those in other unique circumstances.	States can apply different accountability rules for specific categories of schools, including (1) schools in which no grade level is tested on state assessments (for example, PK-2 schools); (2) schools with atypical grade configurations (for example, K-12 schools); (3) small schools that do not meet the minimum number of students to be included in standard accountability rules; (4) schools that are designed to serve special populations (for example, alternative schools, juvenile facilities, or schools for recently arrived English learners); and (5) newly opened schools for which multiple years of data are not available. However, federal guidance (later rescinded) encouraged states to use the same accountability rules for all schools. ^e
Step 2: Identifie	cation of Schools for Most Intensive Suppo	rt (a subset of schools)	
Accountability designations for lowest performing schools	States are required to identify Title I schools that miss AYP targets for four years as in corrective action and for five years as in restructuring.	States are required to identify at least the lowest performing 5% of Title I schools as priority schools. In addition, all <i>Title I</i> high schools with graduation rates below 60 % must be identified as priority schools or focus schools.	States are required to identify at least the lowest performing 5% of Title I schools and <i>all_public</i> high schools with graduation rates below 67 % for CSI.
Role of student groups in identification	Schools that missed AYP for the same group of students for four years were identified for the most intensive support.	Priority school identification is not based on the performance of specific student groups. However, schools with the lowest achieving groups of students or largest within-school achievement gaps (as defined by the state) must be identified as focus schools (not for the most intensive support).	CSI identification is not based on the performance of specific student groups, with the exception of the required ELP progress measure. However, schools with "consistently underperforming" groups of students (as defined by the state) must be identified for targeted support (not for the most intensive support).

	Changes in the Elementary and Secondary Education Act							
Federal Policy	No Child Left Behind Act	Waivers	Every Student Succeeds Act					
Identifying non- Title I schools	States choose whether to identify non-Title I schools for the most intensive support.	States choose whether to identify non-Title I schools for the most intensive support.	States choose whether to identify non-Title I schools for most intensive support, except they are required to identify non-Title I high schools as CSI schools if they had graduation rates below 67%. For CSI schools identified based on low performance (not strictly graduation rate), states have the option to include non-Title I schools. If they do so, these non-Title I CSI schools must be in addition to the lowest performing 5 percent of Title I schools.					

Note: AYP is adequate yearly progress; CSI is Comprehensive Support and Improvement; ED is U.S. Department of Education; ELP is English language proficiency.

^a In the context of school accountability, academic proficiency (a required indicator under NCLB) is expressed in terms of the percentage of students who achieve a defined level of knowledge and skills—for example, the skills to be a proficient third-grade reader. States set a cut score for students to pass, indicating that they are proficient in specific academic subjects. Academic achievement (required under ESSA) may include the percentage of students who are proficient as well as alternative measures of how well students perform. Under ESSA, student achievement measures can include student growth, average performance levels, and scale scores.

^b Specifically, the law emphasizes various potential measures of school quality, including rates of in-school suspensions, out-of-school suspensions, expulsions, school-related arrests, referrals to law enforcement, chronic absenteeism (including both excused and unexcused absences), and incidences of violence, including bullying and harassment.

c NCLB included a provision known as "safe harbor," which allowed for a narrow consideration of student progress in AYP: A school could be considered to have made AYP if the percentage of students not proficient decreased by 10 percent from the prior year.

d While schools were not evaluated for English language proficiency under NCLB, districts were held accountable for it under Title III.

^eED's ESSA accountability guidance (later rescinded) stated: "A State's statewide accountability system must include all public elementary and secondary schools, including all public charter schools" (Question A-1), and "All public schools must be included in a State's accountability system, including special categories of schools, though a State has some discretion for how alternative schools may be included" (Question A-7). ED's Frequently Asked Questions Addendum for ESEA Flexibility includes the following statement: "All students in a State, regardless of the school they attend, must be taught to the same academic standards, and all schools must be included in a State's system of differentiated recognition, accountability, and support. Ideally, an SEA [state education agency] will hold all schools accountable for the same measures and include them in the State's system in the same way" (Question C-18b).

^fIn addition to priority schools, waiver states were required to identify focus schools with low-performing subgroups. States had the option of identifying some or all of their low-graduation-rate schools as focus schools instead of priority schools.

Exhibit A.2. Selected elements of school accountability systems under ESSA, by state, 2017-18

			Inclusion of Non-Title I
		Minimum	Schools in CSI
State	Types of Summative Ratings	N Size	(based on performance)
Alabama	A-F	20	No
Alaska	0-100 index value	10	No
Arizona	A-F	20	No
Arkansas	A-F	15	No
California	CSI/ATSI only	30	No
Colorado	CSI/TSI only	16	No
Connecticut	Category 1 (highest) to Category 5	20	Yes
Delaware	"Well-Below Expectations" to "Exceeds" (4 levels of ratings)	15	Yes
District of Columbia	Stars (5 levels of ratings)	10	Yes
Florida	A-F	10	Yes
Georgia	A-F	15	No
Hawaii	CSI/TSI only	20	No
Idaho	CSI/TSI only	20	Yes
Illinois	"Lowest Performing" to "Exemplary" (4 levels of ratings)	20	No
Indiana	A-F	20	No
Iowa	"Priority/Needs Improvement" to "Exceptional" (6 levels of ratings)	20	No
Kansas	"Below Expectations" to "Exceeds" (4 levels of ratings)	30	No
Kentucky	CSI/TSI only	10	Yes
Louisiana	A-F	10	Yes
Maine	"Requires Review for Supports" to "Exceeds" (4 levels of ratings)	10	No
Maryland	Stars (5 levels of ratings)	10	No
Massachusetts	Tier 1 (highest) to Tier 6	20	Yes
Michigan	CSI/TSI only	30	No
Minnesota	CSI/TSI only	20	No
Mississippi	A-F	10	No
Missouri	CSI/TSI only	30	No
Montana	CSI/TSI only	10	No
Nebraska	"Needs Improvement" to "Excellent" (4 levels of ratings)	10	No
Nevada	Stars (5 levels of ratings)	25	Yes
New Hampshire	CSI/TSI only	11	No
New Jersey	CSI/TSI only	20	No
New Mexico	A-F	20	No

State	Types of Summative Ratings	Minimum <i>N</i> Size	Inclusion of Non-Title I Schools in CSI (based on performance)
New York	CSI/TSI only	30	Yes
North Carolina	A-F	30	No
North Dakota	CSI/TSI only	10	No
Ohio	A-F	25	No
Oklahoma	A-F	10	Yes
Oregon	CSI/TSI only	20	No
Pennsylvania	CSI/TSI only	20	No
Puerto Rico	CSI/TSI only	10	No
Rhode Island	Stars (5 levels of ratings)	20	Yes
South Carolina	"Unsatisfactory" to "Excellent" (5 levels of ratings)	20	No
South Dakota	1-100 index score	10	No
Tennessee	CSI/TSI only	30	Yes
Texas	A-F	25	No
Utah	A-F	10	No
Vermont	CSI/TSI only	25	Yes
Virginia	CSI/TSI only	30	No
Washington	Ratings of 1-10 based on decile in state index	20	No
West Virginia	CSI/TSI only	20	No
Wisconsin	CSI/TSI only	20	No
Wyoming	"Not Meeting Expectations" to "Exceeding" (4 levels of ratings)	10	No
State totals	CSI/TSI only (21) 4-5 levels of ratings (26) 6-10 levels of ratings (3) Index of 100 levels (2)	Median=20 Mode=20 Mean=18 Range=10-30	Yes (14); No (36)

Note: ATSI is Additional Targeted Support and Improvement; CSI is Comprehensive Support and Improvement; ESSA is Every Student Succeeds Act; TSI is Targeted Support and Improvement.

Under the Types of Summative Ratings column, CSI/TSI only refers to states that do not have annual summative ratings for all schools, for all students, using all indicators; the only ratings used are for CSI and TSI schools.

Source: 2017-18 approved state ESSA plans.

Exhibit A.3. Details on measures of school quality and student success, by state, 2017-18

		College and C	Career Readiness	\$		(Other Measure	S	
State	Advanced Coursework	College Placement Test(s)	Career and Technical Education	College Enrollment and Persistence	Chronic Absenteeism	School Climate	On Track to Graduation	Well- Rounded Education	Early Learning
Alabama	✓	✓	✓		✓				
Alaska	✓	✓	✓		✓		✓	✓	✓
Arizona	✓	✓	✓		✓		✓		
Arkansas	✓	✓	✓		✓		✓	✓	
California	✓		✓		✓	✓		✓	
Colorado					✓				
Connecticut	✓	✓	✓		✓		✓	✓	
Delaware	✓	✓	✓		✓		✓		
District of Columbia	✓	✓			✓	✓			
Florida	✓		✓						
Georgia	✓	✓	✓	✓	✓	✓		✓	
Hawaii					✓				
Idaho	✓		✓			✓			
Illinois	✓	✓	✓		✓	✓	✓		
Indiana	✓		✓		✓				
Iowa						✓			
Kansas					✓	✓			
Kentucky	✓	✓	✓		✓	✓		✓	
Louisiana	✓	✓	✓				✓		
Maine					✓				
Maryland	✓		✓		✓	✓	✓	✓	
Massachusetts	✓		✓		✓		✓	✓	
Michigan	✓		✓		✓			✓	
Minnesota					✓				
Mississippi	✓	✓	✓						
Missouri					✓				
Montana	✓	✓	✓		✓	✓			
Nebraska					✓	✓			

		College and (Career Readiness	;		(Other Measure	s	
State	Advanced Coursework	College Placement Test(s)	Career and Technical Education	College Enrollment and Persistence	Chronic Absenteeism	School Climate	On Track to Graduation	Well- Rounded Education	Early Learning
Nevada		✓			✓	✓	✓		✓
New Hampshire	✓	✓	✓					✓	
New Jersey					✓				
New Mexico	✓	✓	✓		✓	✓			
New York	✓		✓		✓			✓	
North Carolina	✓	✓	✓						
North Dakota	✓	✓	✓			✓			
Ohio	✓	✓	✓		✓				✓
Oklahoma	✓		✓		✓				
Oregon					✓		✓		
Pennsylvania			✓		✓				
Puerto Rico		✓				✓	✓		
Rhode Island					✓	✓			
South Carolina	✓	✓	✓			✓			
South Dakota	✓	✓	✓		✓				
Tennessee	✓	✓	✓		✓				
Texas	✓		✓						
Utah	✓	✓	✓						
Vermont	✓	✓	✓	✓				✓	
Virginia					✓				
Washington	✓		✓		✓		✓		
West Virginia	✓		✓		✓	✓	✓		
Wisconsin					✓				
Wyoming	✓	✓	✓					✓	
State totals	36	26	36	2	36	13	12	11	4

Note: Under College and Career Readiness measures, examples of advanced coursework include Advanced Placement and International Baccalaureate, Advanced Sequence, four years of English language arts and three years of mathematics in high schools, and college placement tests (ACT and SAT). Career and technical education includes attainment of industry credentials or completion of a career pathway course sequence. Under Other Measures, early learning refers to academic readiness up to grade 3; on track to graduation typically refers to the number of credits earned; school climate is often measured using staff or student surveys; and examples of a well-rounded education include access to arts and foreign language coursework. Source: 2017-18 approved state ESSA plans.

APPENDIX B. METHODS

This appendix describes the data sources and analytical approaches used in the descriptive analyses presented in this report. The data in this report were derived entirely from existing sources, including public datasets provided by the U.S. Department of Education (ED) and state policy documents. This study was designed to answer the following four questions:

- 1. Did states identify a smaller number of schools for the most intensive supports under the Every Student Succeeds Act (ESSA) compared to prior policies, as intended by policy makers?
- 2. Were there differences in the types of schools identified under ESSA compared to prior policies and what did those differences look like?
- 3. Given new flexibility for states to define school performance more broadly, were the very lowest achieving schools—based on state standardized tests—less likely to be identified under ESSA?
- 4. Under ESSA, did states identify schools with high concentrations of historically underserved students—specifically those who were low income and students of color—for the most intensive support, and how did that compare to prior to ESSA?

B.1 Data Sources

The analyses conducted for this report primarily draw on data collected through ED's ED*Facts* and Common Core of Data's (CCD's) Public Elementary/Secondary School Universe Survey for the 2016-17 and 2018-19 school years. The 2016-17 school year was the last year in which states consistently reported accountability designations prior to ESSA, and 2018-19 was the first year in which all states were expected to report accountability designations under ESSA. The study team also reviewed policy documents to present contextual background on accountability policies under the No Child Left Behind Act (NCLB), the waivers, and ESSA, and to provide potential policy explanations for observed changes in the number and characteristics of schools identified for the most intensive support. Exhibit B.1 summarizes all data sources; additional information about these data sources is provided in the subsequent text.

Exhibit B.1. Data sources, including the sample, timing of data collection, and information obtained from each source

Data Source	Population	Timing of Data Year(s)	Information Obtained
EDFacts	All public schools in 49 states, ^a the District of Columbia, and Puerto Rico	2004-05 through 2015-16 ^b 2016-17 2018-19	School identification status, percentage of students proficient in English language arts and mathematics, and percentage of students who graduated within four years
Common Core of Data	All public schools in 49 states, ^a the District of Columbia, and Puerto Rico	2016-17 2018-19	Charter status, school level, school type, student enrollment, Title I status, urban-centric locale code, percentage of students by eligibility for free or reduced-price lunch, and race/ethnicity
Policy documents	N/A	2001-19	Federal laws, regulations, and guidance on school accountability

Data Source	Population	Timing of Data Year(s)	Information Obtained
	7 nonwaiver states	2016-17	NCLB consolidated state accountability workbooks
	43 waiver states, the District of Columbia, and Puerto Rico	2016-17	ESEA waiver plans
	49 states, ^a the District of Columbia, and Puerto Rico	2017	State plans for implementing school accountability systems under ESSA
	49 states, ^a the District of Columbia, and Puerto Rico	2020	Profiles of each state's proposed ESSA accountability system developed by the American Institutes for Research®
	14 states with the largest increases in alternative schools identified for the most intensive support ^c	2017	Peer review notes on state ESSA plans regarding rules for schools in special circumstances

Note: ESEA is Elementary and Secondary Education Act; ESSA is Every Student Succeeds Act; N/A is not applicable; NCLB is No Child Left Behind.

B.1.1. EDFacts: School Identification Status

Information on the identification of schools for the most intensive support was obtained from ED*Facts*, an ED collection of annual data from states about their districts and schools. For the years prior to 2012-13, when all states operated under NCLB, ED*Facts* included information on schools in *corrective action* or *restructuring*. For 2012-13 through 2016-17, ED*Facts* continued to identify schools in corrective action or restructuring in the seven nonwaiver states, while data for waiver states indicated which schools were identified as *priority*. For 2018-19, the first year when all states were expected to report accountability designations based on ESSA, ED*Facts* provided information on which schools were identified for Comprehensive Support and Improvement (CSI).

The study team also created indicators for two additional types of schools as follows:

- Schools no longer identified for the most intensive support are those that were classified as priority
 schools in waiver states or corrective action/restructuring schools in nonwaiver states in 2016-17 but were
 not identified as CSI in 2018-19.
- Schools newly identified for the most intensive support are those identified as CSI in 2018-19 that were neither priority schools nor corrective action/restructuring schools in 2016-17. It is important to note that schools falling into this category may have been identified for the most intensive support in the years preceding 2016-17.

The report excludes Maine due to missing information on schools identified as CSI in 2018-19. In addition, for Utah, the count of priority schools in 2016-17 is based on data from 2015-16 due to missing 2016-17 data.

^a Maine was excluded due to missing data on the number of schools identified as Comprehensive Support and Improvement in 2018-19.

^b School identification status only. School identification data for 2004-05 through 2015-16 were used to provide historical context for the analysis reported in Exhibit 3.

^x These states include Alaska, California, Colorado, Florida, Georgia, Michigan, Minnesota, North Carolina, New Mexico, Nevada, Oregon, Texas, Utah, and Washington. Although Idaho was one of the states with the largest increases in identified alternative schools, it was excluded due to missing peer review panel notes.

B.1.2. Common Core of Data: School Characteristics

Information on school characteristics came from the 2016-17 and 2018-19 CCD, collected annually by ED's National Center for Education Statistics (NCES) from states.

These data were used for the analyses of the types of schools identified for the most intensive support reported in Exhibit 5 and Appendix Exhibits C.6 through C.9, and for the analyses of the identification of schools with a high concentration of historically underserved students [that is, students eligible for free or reduced-price lunch [FRPL] and students of color] reported in Exhibit 7 and Appendix Exhibits C.13 through C.16. For these analyses, the study team created the following variables from the raw CCD file:

- **School size**: Schools were divided into four categories based on total student enrollment: schools with 200 or fewer students, schools with 201 to 400 students, schools with 401 to 600 students, and schools with greater than 600 students. ¹⁹ Several analyses in the report focus on the category with the lowest enrollment, termed "small."
- **Urbanicity**: Schools were divided into four categories by consolidating urban-centric locale codes: city (schools classified as city, large; city, midsize; or city, small), suburb (schools classified as suburb, large; suburb, midsize; or suburb, small), town (schools classified as town, fringe; town, distant; or town, remote), and rural (schools classified as rural, fringe; rural, distant; or rural, remote).
- Concentration of low-income students: Schools were divided into four categories by the concentration of low-income students: schools where 25 percent or fewer students are eligible for FRPL, schools where 25.1 to 50 percent of students are eligible for FRPL, schools where 50.1 percent to 75 percent of students are eligible for FRPL, and schools where more than 75 percent of students are eligible for FRPL. Several analyses in the report focus on the proportion of schools in the highest FRPL category, termed "high concentration." These categories align with the classification used by NCES' Condition of Education.²⁰
- Concentration of students of color: Schools were divided into four categories by the concentration of students of color (such as Black or Hispanic students): schools where 25 percent or fewer students are students of color, schools where 25.1 to 50 percent of students are students of color, schools where 50.1 to 75 percent of students are students of color, and schools where more than 75 percent of students are students of color. Several analyses in the report focus on the proportion of schools in the highest category of concentration of students of color, termed "high concentration." These categories are aligned with the classification used by NCES' *Condition of Education* for students of color.²¹

Although these data include all public schools in the United States, certain data elements are missing for some schools. Exhibit B.2 presents the variables used in the analyses and their respective percentages of missing values. The descriptive analyses presented in the report include only schools that had non-missing values of the school characteristic; schools with missing values of a characteristic were excluded. Missingness in the data could introduce bias if schools with missing data systematically differ from those with non-missing data, which can be a concern particularly when missing rates exceed 15 percent (falling below an 85 percent response rate). The rates of missingness were below 15 percent, with the exception of the concentration of low-income students (students eligible for FRPL). To help reduce potential bias, analyses involving the number of students eligible for FRPL (Exhibit 7 and Appendix Exhibits C.13 through C.16) exclude states if at least 50 percent of schools identified for the most intensive support or all public schools were missing data for this data element.²²

Exhibit B.2. School characteristics variables used and percentage missing for each variable

		Percentage Missing Across All Schools		Percentage M Schools Ident Intensive	
Variable	Source	2016-17	2018-19	2016-17	2018-19
Charter status	Common Core of Data	0.2%	0.1%	0.0%	1.1%
School level	Common Core of Data	2.3%	2.4%	0.0%	0.8%
School type	Common Core of Data	0.0%	0.0%	0.0%	0.0%
School size	Common Core of Data	0.0%	0.0%	0.0%	0.0%
Title I status	Common Core of Data	9.0%	3.6%	3.0%	2.0%
Urbanicity	Common Core of Data	0.0%	0.0%	0.0%	0.0%
Concentration of low-income students	Common Core of Data	16.4%	17.6%	8.8%	19.8%
Concentration of students of color	Common Core of Data	5.2%	5.6%	0.3%	1.4%
Number of K-12 public schools		101,966	102,075	6,941	5,838

B.1.3. EDFacts: Academic Performance and Outcomes

The study drew on 2016-17 and 2018-19 ED*Facts* data on the percentage of students within each school who were proficient in English language arts (ELA) and mathematics based on state assessments for the analyses reported in Exhibit 6 and Appendix Exhibits C.5 and C.10, and on the percentage of students who graduated within four years for the analysis reported in Appendix Exhibit C.4. Exhibit B.3 displays the variables used in the report's analyses and the percentage missing for each variable. As previously discussed, missingness in the data could introduce bias if schools with missing data systematically differ from those with nonmissing data. Rates of missingness for ELA and mathematics proficiency rates were less than 4 percent. Although rates of missingness for graduation rates were somewhat higher, they remain well below the typical 15 percent threshold that would begin to raise concerns regarding potential bias.

Exhibit B.3. Academic performance and outcome variables used, and percentage missing for each variable

		Percentage Missing Across All School				fied for Most
Variable	Source	2016-17	2018-19	2016-17	2018-19	
ELA proficiency rate	EDFacts	2.5%	3.2%	0.3%	2.8%	
Mathematics proficiency rate	EDFacts	2.5%	2.5%	0.2%	2.4%	
Graduation rate	EDFacts	7.6%	11.1%	4.1%	6.5%	

Note: ELA is English language arts. The percentage of schools missing mathematics or ELA proficiency is based on the number of schools with third- through 12th-grade enrollment (n = 92,769 and 92,372 for total schools in 2016-17 and 2018-19, respectively, and n = 6,843 and 5,703 for schools identified for the most intensive support in 2016-17 and 2018-19, respectively). Measures of proficiency are assumed to not apply to schools serving only kindergarten through second grades because these grade levels are not required to be included in annual assessments for federal accountability purposes. The percentage of schools missing graduation rates is based on the number of schools with 12th-grade enrollment (n = 24,184 and 24,410 for total schools in 2016-17 and 2018-19, respectively, and n = 1,578 and 2,750 for schools identified for the most intensive support in 2016-17 and 2018-19, respectively) under the assumption that the graduation rate would not apply to schools without 12th-grade enrollment.

B.1.4. Policy Documents

The study team reviewed policy documents, including federal laws, regulations, and guidance documents; states' NCLB accountability plans; state waiver applications; profiles of each state's proposed ESSA accountability system developed by the American Institutes for Research in 2020;²³ and peer review panel notes on state ESSA plans. These sources together provided information on the components of federal and state accountability policies, including the goals of the annual evaluation of school performance, methods for determining school accountability designations, required indicators of school performance, flexibility in the use of indicators, inclusion of specific student groups, the minimum number of students to be included in standard accountability rules, rules for schools in special circumstances (for example, small schools; schools with untested grades; schools serving special populations, such as alternative schools, juvenile facilities, and schools for recently arrived English learners; and newly opened schools), and rules for identifying schools for the most intensive support. Section B.3 presents information on the procedures followed when reviewing these documents.

B.2 Approach to Conducting Descriptive Analyses

The study used descriptive analyses of data from ED*Facts* and CCD to examine four aspects related to changes from just prior to ESSA implementation (2016-17) to just after ESSA implementation (2018-19) in the identification of schools for the most intensive support: (1) the overall number and percentage of identified schools; (2) the characteristics of identified schools; (3) the extent to which identified schools were the lowest achieving based on math and ELA proficiency rates; and (4) the extent to which identified schools were those serving traditionally underserved students (specifically, low-income students and students of color). The study examined changes nationwide and, given the policy differences between NCLB and the waivers, separately for waiver and nonwaiver states. Because NCLB, the waivers, and ESSA provided states flexibility in determining whether to apply accountability designations to non-Title I schools, the study's analyses include all public schools, not only Title I schools (for context, Appendix Exhibit C.3 presents information on the number and percentage of Title I schools identified for the most intensive support).

For the analyses examining the extent to which schools identified for the most intensive support were the lowest achieving, the bottom 5 percent were identified for each state based on the combined school-level averages for ELA and mathematics proficiency among schools with at least 10 test scores in both ELA and mathematics. ²⁴ This threshold was selected as it aligns with the smallest minimum number of students selected by states (see Exhibit A.2), making it the most inclusive threshold. ²⁵ West Virginia and Vermont were excluded from these analyses due to missing proficiency data for 2018-19.

B.3 Approach to Conducting Policy Document Review

Understanding key features of state approaches to accountability under ESSA was critical to ensuring appropriate interpretation of analyses of CSI schools. In addition to developing a deep familiarity with the law and guidance, the study team relied on state ESSA profiles described in section B.1.4.

To complement the previously developed ESSA plan syntheses, the study team used other policy documents to gain insights into specific policy questions related to the analyses. Specifically, they focused on understanding the policy basis for state approaches regarding the inclusion of alternative schools in standard accountability rules, the inclusion of non-Title I schools under NCLB and ESSA, and evidence of federal law or guidance that encouraged particular policy shifts, such as reducing the minimum n or encouraging the inclusion of more types of schools in standard accountability rules.

To investigate these policy topics, the study team followed a systematic approach, which involved identifying relevant policy documents, coding information using an Excel template, and ensuring quality assurance. For

example, when seeking to identify patterns and unique approaches to states' inclusion of alternative schools in standard accountability rules, the study team

- identified the states that experienced the greatest increase in the number of alternative schools designated as CSI under ESSA, compared with previous policies;
- reviewed all peer review comments on preliminary state ESSA plan submissions in these identified states, coding any comments that addressed the inclusion of alternative schools in standard accountability rules;²⁶
- coded the peer review comments based on whether they encouraged the inclusion of alternative schools or not; and
- conducted a review of the coded data by a second team member to validate the findings.

APPENDIX C. SUPPORTING DETAILS FOR KEY FINDINGS

This appendix provides exhibits supporting the findings presented in the main report. The exhibits are sequenced in the order they are referenced in the report.

Exhibit C.1. Change in the number of schools identified for the most intensive support, overall and by waiver status and state, 2016-17 (pre-ESSA) to 2018-19 (ESSA)

	Total Number of Public Schools in 2016-17 (Pre-ESSA)	Number of Identified Schools in 2016-17 (Pre-ESSA)	Number of Schools No Longer Identified in 2018-19 (ESSA)	Percentage of Schools No Longer Identified in 2018-19 (ESSA)	Total Number of Public Schools in 2018-19 (ESSA)	Number of Identified Schools in 2018-19 (ESSA)	Number of CSI Schools Newly Identified in 2018-19 (ESSA)	Percentage of CSI Schools Newly Identified in 2018-19 (ESSA)	Net Percentage Change in Number of Identified Schools
All states	101,344	6,917	5,552	80%	101,469	5,838	4,473	77%	-16%
Former waiver states	86,401	2,884	1,882	65%	86,398	4,908	3,906	80%	70%
Alabama	1,551	42	28	67%	1,546	59	45	76%	40%
Alaska	521	16	7	44%	512	83	74	89%	419%
Arizona	2,459	56	25	45%	2,523	198	167	84%	254%
Arkansas	1,108	37	23	62%	1,104	44	30	68%	19%
Colorado	1,898	26	19	73%	1,930	115	108	94%	342%
Connecticut	1,372	38	19	50%	1,032	36	17	47%	-5%
Delaware	234	8	7	88%	231	8	7	88%	0%
District of Columbia	230	29	21	72%	234	18	10	56%	-38%
Florida	4,419	150	102	68%	4,310	551	503	91%	267%
Georgia	2,338	71	56	79%	2,328	102	87	85%	44%
Hawaii	293	10	4	40%	295	18	12	67%	80%
Idaho	758	17	6	35%	767	69	58	84%	306%
Illinois	4,216	130	82	63%	4,375	199	151	76%	53%
Indiana	1,938	188	132	70%	1,950	136	80	59%	-28%
Kansas	1,329	32	12	38%	1,328	57	37	65%	78%
Kentucky	1,569	23	14	61%	1,559	49	40	82%	113%
Louisiana	1,405	60	42	70%	1,403	276	258	93%	360%
Maine ^a	622	24	_	_	_	_	_	_	_
Maryland	1,441	24	12	50%	1,426	43	31	72%	79%
Massachusetts	1,875	35	20	57%	1,872	56	41	73%	60%
Michigan	3,511	174	132	76%	3,824	153	111	73%	-12%

	Total Number of Public Schools in 2016-17 (Pre-ESSA)	Number of Identified Schools in 2016-17 (Pre-ESSA)	Number of Schools No Longer Identified in 2018-19 (ESSA)	Percentage of Schools No Longer Identified in 2018-19 (ESSA)	Total Number of Public Schools in 2018-19 (ESSA)	Number of Identified Schools in 2018-19 (ESSA)	Number of CSI Schools Newly Identified in 2018-19 (ESSA)	Percentage of CSI Schools Newly Identified in 2018-19 (ESSA)	Net Percentage Change in Number of Identified Schools
Minnesota	2,624	43	27	63%	2,620	197	181	92%	358%
Mississippi	1,090	29	24	83%	1,094	39	34	87%	34%
Missouri	2,440	60	34	57%	2,464	64	38	59%	7%
Nevada	690	26	11	42%	758	141	126	89%	442%
New Hampshire	494	19	15	79%	500	20	16	80%	5%
New Jersey	2,607	60	29	48%	2,620	127	96	76%	112%
New Mexico	922	33	27	82%	933	86	80	93%	161%
New York	4,869	183	138	75%	4,851	245	200	82%	34%
North Carolina	2,690	135	88	65%	2,715	109	62	57%	-19%
Ohio	3,645	119	69	58%	3,638	263	213	81%	121%
Oklahoma	1,813	215	155	72%	1,814	101	41	41%	-53%
Oregon	1,261	33	22	67%	1,262	90	79	88%	173%
Pennsylvania	3,064	77	44	57%	3,018	98	65	66%	27%
Puerto Rico	1,329	71	48	68%	1,102	73	50	68%	3%
Rhode Island	320	20	9	45%	326	24	13	54%	20%
South Carolina	1,282	15	11	73%	1,283	45	41	91%	200%
South Dakota	735	29	13	45%	725	21	5	24%	-28%
Tennessee	1,807	72	23	32%	1,874	97	48	49%	35%
Texas	9,474	243	197	81%	9,505	333	287	86%	37%
Utah	1,084	16	7	44%	1,075	62	53	85%	288%
Virginia	2,164	36	17	47%	2,139	39	20	51%	8%
Washington	2,472	103	71	69%	2,478	251	219	87%	144%
West Virginia	765	32	24	75%	747	35	27	77%	9%
Wisconsin	2,295	49	16	33%	2,308	78	45	58%	59%

	Total Number of Public Schools in 2016-17 (Pre-ESSA)	Number of Identified Schools in 2016-17 (Pre-ESSA)	Number of Schools No Longer Identified in 2018-19 (ESSA)	Percentage of Schools No Longer Identified in 2018-19 (ESSA)	Total Number of Public Schools in 2018-19 (ESSA)	Number of Identified Schools in 2018-19 (ESSA)	Number of CSI Schools Newly Identified in 2018-19 (ESSA)	Percentage of CSI Schools Newly Identified in 2018-19 (ESSA)	Net Percentage Change in Number of Identified Schools
Former nonwaiver states	14,943	4,033	3,670	91%	15,071	930	567	61%	-77%
California	10,408	3,270	2,982	91%	10,552	781	493	63%	-76%
Iowa	1,358	169	156	92%	1,338	34	21	62%	-80%
Montana	834	134	106	79%	832	39	11	28%	-71%
Nebraska	1,110	120	108	90%	1,113	27	15	56%	-77%
North Dakota	546	87	78	90%	548	14	5	36%	-84%
Vermont	315	173	167	97%	316	15	9	60%	-91%
Wyoming	372	80	73	91%	372	20	13	65%	-75%

Note: CSI is Comprehensive Support and Improvement; ESSA is Every Student Succeeds Act.

Schools identified for the most intensive support in 2016-17 refer to priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools classified as no longer identified refer to any school identified in 2016-17 as a priority school in a waiver state or for corrective action or restructuring in a nonwaiver state, which was not identified as CSI in 2018-19. Newly identified schools refer to any CSI school in a waiver state that was not identified as a priority school in 2016-17 or any CSI school in a nonwaiver state that was not identified for corrective action or restructuring in 2016-17. (Schools in this category may have been identified for the most intensive support in the years preceding 2016-17.)

Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 50 states, the District of Columbia, and Puerto Rico. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: U.S. Department of Education, EDFacts, Data Group (DG) 34, "Improvement status," 2016-17, and DG 866, "Comprehensive Support and Improvement (CSI) identification," 2018-19; U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), "Public Elementary/Secondary School Universe Survey," 2016-17 and 2018-19.

[—] Data on the number of schools identified as CSI in 2018-19 are not available.

^a State excluded from the aggregate counts (bolded rows) due to missing or incomplete data for either 2016-17 or 2018-19.

Exhibit C.2. Number and percentage of Title I schools identified for the most intensive support, by waiver status and state, 2016-17 (pre-ESSA) and 2018-19 (ESSA)

		2016-17 (1	Pre-ESSA)			2018-19	9 (ESSA)	
	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified
All states	55,500	6,515	12%	7%	56,123	4,551	8%	6%
Former waiver states	46,494	2,554	5%	3%	46,636	3,731	8%	6%
Alabama	939	42	4%	3% ^b	937	58	6%	4%
Alaska	287	16	6%	$3\%^{\mathrm{b}}$	368	67	18%	16%
Arizona	1,105	38	3%	2% ^b	1,352	175	13%	8%
Arkansas	823	37	4%	$3\%^{\mathrm{b}}$	815	44	5%	4%
Colorado	706	26	4%	1%	732	66	9%	6%
Connecticut	637	32	5%	3% ^c	613	31	5%	$3\%^d$
Delaware	139	7	5%	3% ^c	154	8	5%	3% ^d
District of Columbia ^a	183	29	16%	13% ^b	_	_	_	8% ^d
Florida	1,995	150	8%	3%	2,148	356	17%	13% ^d
Georgia	1,649	71	4%	3%	1,628	90	6%	4%
Hawaii	186	9	5%	3% ^b	189	17	9%	6%
Idaho	434	17	4%	2% ^c	443	43	10%	$9\%^d$
Illinois ^a	_	-	-	3% ^c	2,667	183	7%	5%
Indiana	1,039	188	18%	10%	1,009	98	10%	7%
Kansas	664	32	5%	2%	663	32	5%	4%
Kentucky	929	23	2%	$1\%^2$	916	49	5%	$3\%^d$
Louisiana	1,045	60	6%	4%	1,060	266	25%	20% ^d
Maine ^a	360	22	6%	4% ^c	_	_	_	_
Maryland	429	24	6%	2%	422	27	6%	3%
Massachusetts	1,092	35	3%	2% ^b	1,130	55	5%	$3\%^{\mathrm{d}}$
Michigan	1,832	157	9%	5% ^b	1,821	108	6%	4%
Minnesota	2,213	43	2%	2%	2,213	174	8%	8%

		2016-17 (Pre-ESSA)			2018-19 (ESSA)			
	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified	
Mississippi	743	29	4%	3%	753	36	5%	4%	
Missouri	1,199	59	5%	2% ^c	1,210	63	5%	3%	
Nevada	377	25	7%	4% ^c	413	101	24%	19% ^d	
New Hampshire	259	19	7%	4%	244	15	6%	4%	
New Jersey	1,755	59	3%	2% ^b	1,710	126	7%	5%	
New Mexico	727	33	5%	4% ^c	730	78	11%	9%	
New York	3,582	181	5%	4% ^b	3,599	233	6%	5% ^d	
North Carolina	1,434	107	7%	5% ^c	1,499	85	6%	4%	
Ohio	2,307	118	5%	3% ^c	2,245	245	11%	7%	
Oklahoma	1,236	201	16%	12% ^b	1,256	80	6%	6% ^d	
Oregon ^a	-	_	_	3% ^c	569	45	8%	7%	
Pennsylvania	1,742	77	4%	3%	1,723	96	6%	3%	
Puerto Rico	1,266	70	6%	5% ^b	830	73	9%	7%	
Rhode Island	176	20	11%	6%	180	21	12%	7% ^d	
South Carolina	606	15	2%	1%	623	36	6%	4%	
South Dakota	331	29	9%	4% ^c	317	19	6%	3%	
Tennessee	1,231	72	6%	4% ^b	1,243	94	8%	5% ^d	
Texas	6,066	243	4%	3%	6,172	311	5%	4%	
Utah	326	16	5%	1%	352	37	11%	6%	
Virginia	748	36	5%	2%	760	38	5%	2%	
Washington	1,032	89	9%	4% ^c	1,011	108	11%	10%	
West Virginia ^a	_	_	_	4% ^b	341	32	9%	5%	
Wisconsin	1,208	49	4%	2%	1,153	72	6%	3%	
Former nonwaiver states	9,006	3,961	44%	27%	9,487	820	9%	6%	
California	6,607	3,258	49%	31% ^b	7,074	685	10%	7%	
Iowa	595	169	28%	12%	613	31	5%	3%	
Montana	678	134	20%	16% ^b	680	38	6%	5%	

		2016-17 (1	Pre-ESSA)		2018-19 (ESSA)				
	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified	Total Number of Title I Schools	Number of Identified Title I Schools	Percentage of Title I Schools Identified	Percentage of Public Schools Identified	
Nebraska	460	120	26%	11%	451	26	6%	2%	
North Dakota	276	87	32%	16%	266	13	5%	3%	
Vermont	234	145	62%	55% ^b	232	15	6%	$5\%^{\mathrm{d}}$	
Wyoming	156	48	31%	22% ^b	171	12	7%	5%	

Note: ESSA is Every Student Succeeds Act.

Source: EDFacts, "Improvement status," 2016-17, and "CSI identification," 2018-19; CCD, 2016-17 and 2018-19.

⁻Data on Title I status not available.

^a State excluded from the aggregate counts (bolded rows) due to missing or incomplete data for either 2016-17 or 2018-19.

^b State included non-Title I-participating schools in its identification determinations for 2016-17.

c State included non-Title I-participating high schools with low graduation rates in its identification determinations for 2016-17.

^d State included non-Title I-participating schools in addition to non-Title I high schools with low graduation rates in its identification determinations for 2018-19. Schools identified for the most intensive support in 2016-17 refer to priority schools in waiver states and corrective action or restructuring schools in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement. The exhibit includes 50 states, the District of Columbia, and Puerto Rico. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

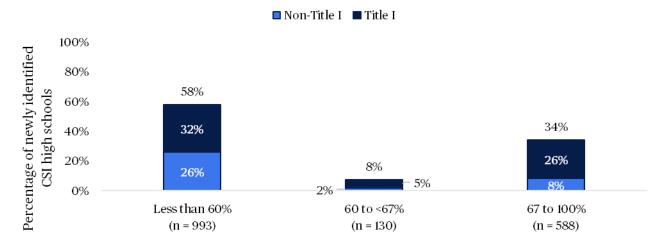
Exhibit C.3. Number and percentage of schools identified for the most intensive support, by waiver status, 2004-05 to 2018-19

	Fo	rmer Waiver Stat	tes	Former Nonwaiver States					
Year	Total Number of Public Schools	Number of Identified Schools	Percentage of Public Schools Identified	Total Number of Public Schools	Number of Identified Schools	Percentage of Public Schools Identified			
2004-05	80,949	1,785	2%	14,281	504	4%			
2005-06	82,152	1,956	2%	14,398	841	6%			
2006-07	82,557	3,615	4%	14,398	1,243	9%			
2007-08	84,069	4,268	5%	14,642	1,352	9%			
2008-09	83,637	4,566	5%	14,586	1,648	11%			
2009-10	84,163	5,401	6%	14,587	1,824	13%			
2010-11	83,675	6,202	7%	14,633	2,060	14%			
2011-12	82,483	8,133	10%	14,293	2,499	17%			
2012-13	81,540	4,606	6%	14,301	3,253	23%			
2013-14	81,622	3,605	4%	14,330	4,060	28%			
2014-15	83,189	2,729	3%	14,467	4,252	29%			
2015-16	83,126	2,816	3%	14,368	4,083	28%			
2016-17	86,401	2,884	3%	14,943	4,033	27%			
2017-18	86,643	N/A	N/A	14,975	N/A	N/A			
2018-19	86,398	4,908	6%	15,071	930	6%			

Note: Because 2017-18 served as a transition period before full implementation of the Every Student Succeeds Act's accountability requirements, the number and percentage of identified schools for 2017-18 are reported as not applicable (N/A). Schools identified for the most intensive support in the years preceding 2018-19 refer to priority schools in waiver states under the waivers and schools identified for corrective action or restructuring in nonwaiver states and waiver states under the No Child Left Behind Act. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 49 states, the District of Columbia, and Puerto Rico. Maine is excluded due to missing data on the number of schools identified as CSI in 2018-19. For states with missing data on the number of schools identified for the most intensive support for a given year, the missing number of identified schools was imputed using the average of the prior and subsequent years (simple linear interpolation) for the given state. The number of states for which the number of schools was imputed ranged from zero to six in a given year. In eight of the 15 years, there were no imputations.

Source: EDFacts, "Improvement status," 2004-05 through 2016-17, and "CSI identification," 2018-19; CCD, 2004-05 to 2018-19.

Exhibit C.4. Percentage of newly identified CSI high schools, by Title I status and 2018-19
4-year graduation rate

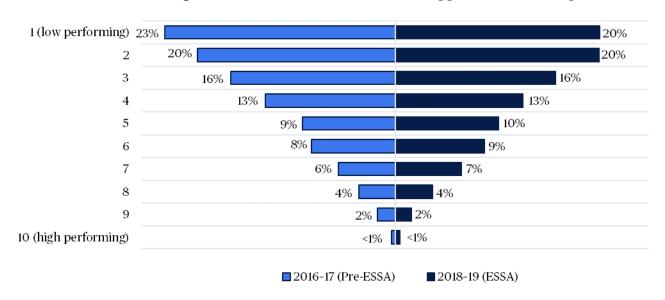


2018-19 four-year graduation rate

Note: CSI is Comprehensive Support and Improvement. Newly identified high schools refer to any CSI high school in a waiver state that was not identified as a priority school in 2016-17 or any CSI school in a nonwaiver state that was not identified for corrective action or restructuring in 2016-17. (Schools in this category may have been identified for the most intensive support in the years preceding 2016-17.) The Every Student Succeeds Act introduced two changes to the identification of high schools for the most intensive support: (1) altering the threshold for identification from 60 percent to 67 percent, and (2) requiring identification of all public high schools, including both Title I and non-Title I high schools. These changes explain the identification of 577 newly identified high schools: 130 had a graduation rate between 60 and 67 percent, and 483 were non-Title I with a graduation rate below 67 percent (36 schools are included in both groups). The exhibit includes 1,711 of the 1,815 newly identified high schools in 49 states, the District of Columbia, and Puerto Rico. Data were not available for 104 schools. The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19.

Source: EDFacts, "Improvement status," 2016-17, "CSI identification," 2018-19, and DG 695, "Regulatory Adjusted-Cohort Graduation Rate," 2016-17 and 2018-19; CCD, 2016-17 and 2018-19.

Exhibit C.5. Achievement decile distribution in English language arts and mathematics among schools no longer identified for the most intensive support after ESSA implementation



Note: ESSA is Every Student Succeeds Act. Schools classified as no longer identified refer to any school identified in 2016-17 as a priority school in a waiver state, or for corrective action or restructuring in a nonwaiver state, which was not identified as Comprehensive Support and Improvement (CSI) in 2018-19.

This exhibit illustrates that schools no longer identified for the most intensive support under ESSA maintained a similar overall distribution in English language arts (ELA) and mathematics achievement before and after the implementation of ESSA, suggesting that improved outcomes may not be a major factor for why these schools are no longer identified. Prior to ESSA, 23 percent of these schools were in the lowest decile, compared with 20 percent after the implementation of ESSA.

To calculate achievement deciles, the combined school-level average for ELA and mathematics was calculated by averaging the percent proficient in the two subjects among all public schools with 10 or more valid scores in both subject areas. For each state and academic year, school-level averages were then ranked, divided into 10 equal groups, and assigned to one of the deciles. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 5,235 of the 5,361 schools no longer identified for the most intensive support after ESSA implementation in 47 states, the District of Columbia, and Puerto Rico. (A total of 126 schools were excluded for 2016-17 due to missing proficiency data or reporting fewer than 10 valid scores in either ELA or mathematics in 2016-17. For 2018-19, 490 schools were excluded for the same reasons, along with the additional criterion of closing prior to 2018-19.) The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19, and Vermont and West Virginia (191 schools no longer identified for the most intensive support) due to missing proficiency data for 2018-19. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17, "CSI identification," 2018-19, DG 583, "Academic achievement in mathematics," 2016-17 and 2018-19, and DG 584, "Academic achievement in reading/language arts," 2016-17 and 2018-19.

Exhibit C.6. Change in the percentage of schools identified for the most Intensive support, by waiver status and school characteristic, 2016-17 (pre-ESSA) to 2018-19 (ESSA)

					Donountage	
	Percentage of Public Schools in 2016-17 (Pre-		Percentage of Public Schools in 2018-19	Percentage of Identified Schools in 2018-19	Percentage Point (pp) Change in the Percentage of Identified	Net Change in Number of Identified
All states	ESSA)	ESSA)	(ESSA)	(ESSA)	Schools	Schools
By school size						
≤200	24%	12%	23%	35%	23 pp	142%
201-400	24%	26%	24%	28%	23 pp 2 pp	-9%
401-600	24%	28%	24%	19%	-9 pp	-43%
>600	29%	35%	28%	19%	-16 pp	-54%
By school level	2370	3370	2070	1370	юрр	31/0
Elementary	56%	60%	54%	36%	-24 pp	-49%
Middle	15%	16%	17%	15%	-1 pp	-24%
High	21%	19%	24%	39%	20 pp	75%
Nonstandard	8%	5%	6%	10%	5 pp	60%
By school type	370	2,0	0,0	1070	o pp	0070
Regular	91%	96%	91%	77%	-19 pp	-32%
Alternative	6%	4%	6%	20%	16 pp	340%
Special education	2%	<1%	2%	3%	3 pp	439%
Vocational	1%	<1%	2%	<1%	0 pp	31%
By charter status					11	
Charter	8%	8%	8%	19%	11 pp	102%
Noncharter	92%	92%	92%	81%	-11 pp	-20%
By urbanicity						
City	27%	51%	27%	49%	-2 pp	-19%
Suburb	32%	25%	32%	24%	-1 pp	-19%
Town	13%	11%	13%	11%	Орр	-16%
Rural	27%	14%	27%	17%	3 pp	3%
Former waiver states						
By school size						
≤200	23%	18%	22%	33%	15 pp	217%
201-400	24%	33%	25%	29%	-4 pp	49%
401-600	25%	25%	24%	19%	-6 pp	30%
>600	29%	24%	29%	19%	-5 pp	32%
By school level						
Elementary	55%	51%	53%	38%	-13 pp	25%
Middle	15%	16%	17%	14%	-2 pp	56%
High	21%	25%	24%	39%	14 pp	161%
Nonstandard	8%	9%	6%	9%	0 pp	82%
By school type						
Regular	91%	94%	91%	79%	-15 pp	44%
Alternative	5%	5%	5%	17%	12 pp	506%
Special education	2%	1%	2%	3%	2 pp	430%
Vocational	2%	<1%	2%	<1%	0 pp	31%

	Percentage of Public Schools in 2016-17 (Pre- ESSA)	Percentage of Identified Schools in 2016-17 (Pre- ESSA)	Percentage of Public Schools in 2018-19 (ESSA)	Percentage of Identified Schools in 2018-19 (ESSA)	Percentage Point (pp) Change in the Percentage of Identified Schools	Net Change in Number of Identified Schools
By charter status						
Charter	7%	13%	8%	19%	6 pp	157%
Noncharter	93%	87%	92%	81%	-6 pp	63%
By urbanicity						
City	27%	63%	27%	51%	-12 pp	37%
Suburb	32%	15%	32%	22%	7 pp	145%
Town	13%	8%	13%	11%	3 pp	145%
Rural	28%	14%	28%	16%	2 pp	95%
Former nonwaiver states						
By school size						
≤200	29%	8%	29%	43%	35 pp	23%
201-400	20%	21%	20%	23%	2 pp	-75%
401-600	22%	29%	22%	15%	-14 pp	-88%
>600	29%	42%	28%	19%	-23 pp	-89%
By school level						
Elementary	59%	66%	57%	29%	-37 pp	-90%
Middle	14%	17%	15%	16%	-1 pp	-78%
High	22%	14%	23%	43%	29 pp	-32%
Nonstandard	5%	3%	5%	12%	9 pp	8%
By school type						
Regular	90%	97%	90%	63%	-34 pp	-85%
Alternative	8%	3%	8%	34%	31 pp	153%
Special education	1%	0%	2%	3%	3 pp	500%
Vocational	1%	0%	1%	0%	0 pp	0%
By charter status						
Charter	11%	5%	12%	15%	10 pp	-20%
Noncharter	89%	95%	88%	85%	-10 pp	-79%
By urbanicity						
City	32%	42%	33%	40%	-2 pp	-78%
Suburb	30%	31%	30%	31%	Орр	-77%
Town	12%	13%	12%	10%	-3 pp	-83%
Rural	26%	13%	26%	20%	7 pp	-66%

Note: ESSA is Every Student Succeeds Act. Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring schools in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 101,344 public schools and 6,917 identified schools in 2016-17, and 101,469 public schools and 5,838 identified schools in 2018-19 in 49 states, the District of Columbia, and Puerto Rico. For waiver states, the exhibit includes 86,401 public schools and 2,884 identified schools in 2016-17, and 86,309 public schools and 4,908 identified schools in 2018-19. For nonwaiver states, the exhibit includes 14,943 public schools and 4,033 identified schools in 2016-17, and 15,071 public schools and 930 identified schools in 2018-19. Sample sizes for each characteristic may vary due to missing data. Rounding may cause slight discrepancies in sums and differences. The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17, and "CSI identification," 2018-19; CCD, 2016-17 and 2018-19.

Exhibit C.7. Number of schools identified for the most intensive support, by waiver status, state, and school characteristic, 2018-19 (ESSA)

		School	l Size		School Level		School Type						Urban	icity			
	≤200	201- 400	401- 600	>600	Elem	Middle	High	Other	Regular	Alternative	Special Ed	Vocational	Charter School	City	Suburb	Town	Rural
All states	2,016	1,632	1,096	1,094	2,091	854	2,274	569	4,480	1,174	167	17	1,050	2,854	1,381	639	964
Former waiver states	1,620	1,419	954	915	1,823	702	1,879	456	3,893	855	143	17	921	2,484	1,096	548	780
Alabama	3	10	25	21	31	9	19	0	59	0	0	0	0	37	4	5	13
Alaska	66	12	2	3	3	0	21	59	63	18	2	0	3	12	2	14	55
Arizona	100	49	21	28	50	22	115	11	185	9	3	1	103	101	23	30	44
Arkansas	11	17	10	6	23	8	10	0	43	1	0	0	6	27	2	5	10
Colorado	49	40	16	10	38	5	63	9	60	52	1	2	23	50	32	16	17
Connecticut	4	12	8	12	17	10	9	0	35	1	0	0	2	26	10	0	0
Delaware	0	4	1	3	3	4	1	0	8	0	0	0	0	4	3	0	1
District of Columbia	1	13	1	3	4	3	11	0	13	5	0	0	6	18	0	0	0
Florida	259	106	92	94	203	38	189	105	252	216	81	2	123	209	253	41	48
Georgia	23	13	29	37	39	16	40	7	91	8	3	0	7	42	38	9	13
Hawaii	9	2	2	5	3	1	4	10	16	1	1	0	11	4	3	2	9
Idaho	54	8	4	3	7	15	43	4	28	41	0	0	11	8	17	19	25
Illinois	43	94	26	36	106	39	49	5	199	0	0	0	24	139	33	11	16
Indiana	21	53	37	25	66	9	55	6	135	1	0	0	32	84	13	16	23
Kansas	11	14	11	21	18	12	19	8	57	0	0	0	4	39	1	8	9
Kentucky	2	13	17	17	31	8	7	3	49	0	0	0	0	26	12	5	6
Louisiana	58	103	72	43	152	49	50	25	268	3	5	0	48	134	46	53	43
Maryland	4	17	14	8	19	3	20	1	36	4	1	2	6	38	5	0	0
Massachusetts	4	18	16	18	13	26	13	3	54	0	0	2	3	33	21	1	1
Michigan	54	55	25	19	52	7	70	21	103	50	0	0	40	98	44	2	9
Minnesota	94	37	12	54	38	6	143	10	128	69	0	0	38	84	58	29	26
Mississippi	10	15	10	4	11	14	8	1	39	0	0	0	0	11	0	11	17
Missouri	16	23	13	12	23	14	27	0	63	0	0	1	7	41	11	2	10
Nevada	46	20	20	55	77	25	35	4	118	22	1	0	12	61	35	16	29
New Hampshire	11	3	5	1	11	1	8	0	20	0	0	0	6	7	4	5	4
New Jersey	11	51	36	29	73	30	20	4	125	0	1	1	10	52	65	3	7
New Mexico	36	24	13	13	7	17	54	4	69	17	0	0	27	36	12	22	16

		School	l Size		School Level			School Type						Urban	icity		
	000	201-	401-	200				a.1			Special		Charter	ot.		_	
Non Voul	≤200	400	600	>600	Elem	Middle	High		U	Alternative	Ed	Vocational	School	City	Suburb	Town	Rural
New York	23	90	76	56	113	48	76	8	241	2	0	2		143	46	30	26
North Carolina	53	22	23	11	31	24	42	10	69	36	4			59	13	12	
Ohio	93	86	31	53	66	15	140	42	242	0	21			197	39	17	10
Oklahoma	45	29	16	11	45	20	35	0		0				42		14	37
Oregon	42	23	17	8	31	4	41	14	71	19	0			22		26	22
Pennsylvania	11	17	39	31	16	25	47	10	94	0				76		2	
Puerto Rico	13	40	19	1	11	22	30	5	68	0	5	0	0	32	31	5	5
Rhode Island	6	2	5	11	5	7	10	2		1	1	0	4	16	7	0	1
South Carolina	10	14	10	11	19	8	13	5	42	0	3	0	13	15	12	8	10
South Dakota	12	6	2	1	11	4	6	0	19	2	0	0	0	1	0	0	20
Tennessee	12	40	28	17	49	28	19	1	97	0	0	0	31	87	1	2	7
Texas	102	90	74	67	138	63	109	17	240	93	0	0	91	152	52	47	82
Utah	21	20	14	7	28	1	20	13	36	18	8	0	16	18	35	3	6
Virginia	0	10	18	11	27	9	3	0	38	1	0	0	0	27	4	3	5
Washington	157	51	26	17	53	17	155	26	96	153	2	0	0	98	57	45	51
West Virginia	3	17	9	6	22	10	3	0	35	0	0	0	0	7	4	8	16
Wisconsin	17	36	9	16	40	6	27	3	66	12	0	0	9	71	2	1	4
ormer nonwaiver states	396	213	142	179	268	152	395	113	587	319	24	0	129	370	285	91	184
California	314	174	127	166	189	127	351	112	440	317	24	0	128	338	282	69	92
Iowa	8	15	9	2	25	5	3	1	32	2	0	0	0	15	0	6	13
Montana	30	7	1	1	15	10	14	0	39	0	0	0	0	0	0	7	32
Nebraska	9	5	4	9	13	7	7	0	27	0	0	0	0	13	2	1	11
North Dakota	12	2	0	0	11	1	2	0	14	0	О	0	0	0	0	0	14
Vermont	9	5	0	1	12	0	3	0	15	0	0	0	0	2	1	1	11
Wyoming	14	5	1	0	3	2	15	0	20	0	0	0	1	2	0	7	11

Note: ESSA is Every Student Succeeds Act. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 49 states, the District of Columbia, and Puerto Rico. The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19. Sample sizes for each characteristic may vary due to missing data.

Source: EDFacts, "CSI identification," 2018-19; CCD, 2018-19 (n = 49 states, the District of Columbia, and Puerto Rico).

Exhibit C.8. Number of schools identified for the most intensive support, by waiver status, state, and school characteristic, 2016-17 (pre-ESSA)

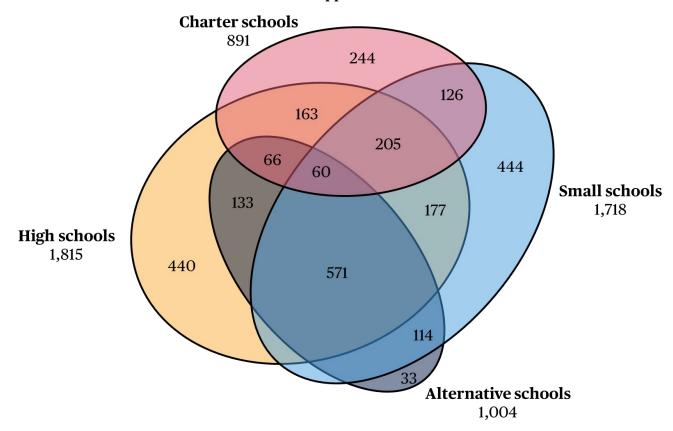
		Schoo	ol Size			School	Level		School Type				Urbani	city			
	≤200	201- 400	401- 600	>600	Elem	Middle	High	Other	Regular	Alternative	Special Ed	Vocational	Charter School	City	Suburb	Town	Rural
All states	833	1,788	1,907	2,389	4,132	1,130	1,298	356	6,606	267	31	13	520	3,516	1,701	764	936
Former waiver states	511	950	732	691	1,463	450	719	251	2,703	141	27	13	358	1,814	447	224	399
Alabama	5	17	8	12	5	17	15	5	42	0	0	0	0	20	4	3	15
Alaska	11	5	0	0	0	0	0	16	16	0	0	0	0	0	0	0	16
Arizona	30	13	9	4	17	7	24	8	53	3	0	0	19	21	6	16	13
Arkansas	9	11	5	12	6	10	20	1	36	1	0	0	6	17	3	9	8
Colorado	1	15	6	4	16	5	3	2	24	2	0	0	0	20	5	1	0
Connecticut	7	13	6	12	19	5	14	0	37	1	0	0	4	32	5	1	0
Delaware	1	2	2	3	4	0	4	0	7	0	0	1	1	5	3	0	0
District of Columbia	2	17	5	5	16	2	10	1	26	3	0	0	2	29	0	0	0
Florida	26	23	48	53	115	23	2	10	143	7	0	0	16	56	69	9	16
Georgia	7	14	14	36	13	1	49	8	69	0	2	0	4	33	20	8	10
Hawaii	3	3	1	3	5	1	1	3	8	1	1	0	4	3	2	2	3
Idaho	8	6	2	1	5	4	4	4	10	7	0	0	1	1	5	3	8
Illinois	18	44	23	45	51	7	72	0	130	0	0	0	4	98	28	0	4
Indiana	18	57	71	42	96	55	24	13	187	1	0	0	25	130	29	15	14
Kansas	1	5	17	9	13	18	1	0	32	0	0	0	0	32	0	0	0
Kentucky	0	3	4	16	2	6	12	3	23	0	0	0	0	15	3	1	4
Louisiana	6	8	24	22	45	2	11	2	60	0	0	0	60	58	1	0	1
Maine ^a	15	8	0	1	16	1	4	3	24	0	0	0	0	4	1	0	19
Maryland	1	10	8	5	12	4	4	4	24	0	0	0	2	21	3	0	0
Massachusetts	1	13	9	12	15	9	9	2	33	0	0	2	0	25	9	1	0
Michigan	20	72	46	36	96	8	51	19	171	3	0	0	28	120	45	3	6
Minnesota	9	20	11	3	34	5	0	4	43	0	0	0	12	29	2	2	10
Mississippi	3	14	7	5	10	5	12	2	29	0	0	0	0	4	0	12	13
Missouri	5	38	8	9	39	10	10	1	58	1	0	1	6	45	15	0	0
Nevada	2	3	3	18	8	2	11	5	25	1	0	0	7	16	9	0	1
New Hampshire	3	9	6	1	12	2	5	0	19	0	0	0	0	7	3	5	4
New Jersey	4	24	19	13	34	12	12	2	59	0	0	1	0	45	15	0	0

		Schoo	l Size			School	Level			School	Туре				Urbani	city	
		201- 400	401- 600	>600	Elem	Middle	High	Other	Regular	Alternative	Special Ed	Vocational	Charter School	City	Suburb	Town	Rural
New Mexico	9	13	8	3	24	5	3	1	33	0	0	0	7	12	3	10	8
New York	22	70	44	47	90	41	44	8	181	2	0	0	3	162	19	2	0
North Carolina	37	43	28	27	54	24	31	26	108	25	2	0	9	63	10	26	36
Ohio	29	52	24	14	58	7	17	36	101	0	18	0	33	106	11	2	0
Oklahoma	77	63	42	33	147	35	30	3	215	0	0	0	7	102	10	18	85
Oregon	11	6	8	8	17	2	14	0	27	6	0	0	3	15	4	8	6
Pennsylvania	6	9	33	29	28	8	32	9	75	0	1	1	17	66	9	1	1
Puerto Rico	12	35	18	6	10	10	39	12	66	0	0	5	0	40	27	3	1
Rhode Island	1	2	5	12	8	4	7	1	19	0	1	0	0	15	5	0	0
South Carolina	1	7	6	1	12	2	1	0	15	0	0	0	0	6	0	5	4
South Dakota	21	5	2	1	20	4	5	0	28	1	0	0	0	2	0	0	27
Tennessee	2	34	22	14	39	18	13	2	72	0	0	0	21	71	0	0	1
Texas	49	64	65	65	121	38	68	16	187	55	1	0	48	156	32	35	20
Utah	1	5	6	4	7	0	5	4	16	0	0	0	6	1	10	2	3
Virginia	1	7	15	13	27	7	1	1	35	1	0	0	0	26	3	2	5
Washington	24	36	29	14	62	20	8	13	82	20	1	0	0	36	17	16	34
West Virginia	6	10	10	6	17	3	9	3	30	0	0	2	0	5	3	3	21
Wisconsin	1	30	5	13	34	2	12	1	49	0	0	0	3	48	0	0	1
Former nonwaiver states	322	838	1,175	1,698	2,669	680	579	105	3,903	126	4	0	162	1,702	1,254	540	537
California	144	501	1,008	1,617	2,127	573	479	91	3,141	125	4	0	161	1,517	1,218	305	230
Iowa	6	82	60	21	154	13	2	0	168	1	0	0	1	73	11	45	40
Montana	48	45	26	15	59	36	39	0	134	0	0	0	0	15	4	60	55
Nebraska	23	55	26	16	104	12	4	0	120	0	0	0	0	57	5	28	30
North Dakota	41	29	14	3	63	10	14	0	87	0	0	0	0	11	4	16	56
Vermont	41	80	30	22	110	20	31	12	173	0	0	0	0	12	10	44	107
Wyoming	19	46	11	4	52	16	10	2	80	0	0	0	0	17	2	42	19

Note: ESSA is Every Student Succeeds Act. ^a State excluded from the aggregate counts (bolded rows) due to missing or incomplete data for either 2016-17 or 2018-19. (Although this exhibit focuses on 2016-17, it serves to supplement Exhibit 5, which requires complete data for both years.) Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring schools in nonwaiver states. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 50 states, the District of Columbia, and Puerto Rico. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state. Sample sizes for each characteristic may vary due to missing data.

Source: EDFacts, "Improvement status," 2016-17; CCD, 2016-17.

Exhibit C.9. Intersection of alternative, high, small, and charter schools among schools newly identified for the most intensive support



Note: Newly identified schools refer to any Comprehensive Support and Improvement (CSI) school in a waiver state that was not identified as a priority school in 2016-17, or any CSI school in a nonwaiver state that was not identified for corrective action or restructuring in 2016-17. (Schools in this category may have been identified for the most intensive support in the years preceding 2016-17.)

This exhibit illustrates the intersection of newly identified schools that were alternative schools, high schools, small schools, or charter

schools—the four school characteristics that exhibited the largest increases in the percentage of schools identified for the most intensive support. Of the newly identified schools, 60 possessed all four characteristics, while 244 were charter schools with none of the other characteristics. In addition, 33 were exclusively alternative schools, 440 exclusively high schools, and 444 exclusively small schools. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. Of the 4,473 newly identified schools across 49 states, the District of Columbia, and Puerto Rico, 2,803 schools were in one or more of these categories. Within this exhibit, 2,776 schools are displayed. (A total of 27 schools were excluded from the exhibit because it was impossible to accurately visualize them due to overlapping constraints. These excluded schools include 21 small, alternative, charter schools and six alternative, charter schools.). The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19.

Source: EDFacts, "Improvement status," 2016-17, and "CSI identification," 2018-19; CCD, 2018-19.

Exhibit C.10. Percentage of schools identified for the most intensive support that were in the bottom 5 percent for English language arts and mathematics proficiency, by waiver status and state, 2016-17 (pre-ESSA) and 2018-19 (ESSA)

	Numbe Identified		Percentage of Schools in the Bo	
	2016-17 (Pre-ESSA)	2018-19 (ESSA)	2016-17 (Pre-ESSA)	2018-19 (ESSA)
All states	6,549	5,250	19%	37%
Former waiver states	2,760	4,401	37%	38%
Alabama	42	59	43%	46%
Alaska	16	64	56%	17%
Arizona	51	184	25%	27%
Arkansas	37	39	49%	51%
Colorado	24	105	38%	39%
Connecticut	38	35	68%	77%
Delaware	8	7	13%	14%
District of Columbia	29	15	28%	33%
Florida	137	464	3%	34%
Georgia	70	100	37%	53%
Hawaii	10	18	60%	44%
Idaho	16	60	38%	43%
Illinois	129	198	43%	25%
Indiana	181	122	32%	42%
Kansas	32	57	69%	47%
Kentucky	23	48	4%	6%
Louisiana	57	260	14%	20%
Maine ^a	22	_	18%	_
Maryland	24	43	54%	67%
Massachusetts	34	55	35%	60%
Michigan	165	147	21%	50%
Minnesota	43	151	12%	23%
Mississippi	27	31	22%	42%
Missouri	49	63	61%	48%
Nevada	26	136	12%	15%
New Hampshire	18	14	33%	50%
New Jersey	60	124	60%	41%
New Mexico	32	76	16%	30%
New York	179	240	56%	31%
North Carolina	133	102	44%	56%

	Numb Identified		Percentage of Schools in the Bo	
	2016-17 (Pre-ESSA)	2018-19 (ESSA)	2016-17 (Pre-ESSA)	2018-19 (ESSA)
Ohio	115	236	50%	52%
Oklahoma	210	89	30%	47%
Oregon	33	81	30%	43%
Pennsylvania	77	96	56%	47%
Puerto Rico	71	73	38%	40%
Rhode Island	20	21	55%	48%
South Carolina	15	41	40%	17%
South Dakota	29	18	41%	50%
Tennessee	70	94	50%	48%
Texas	233	321	32%	29%
Utah	16	47	31%	45%
Virginia	35	38	66%	74%
Washington	97	157	30%	37%
West Virginia ^a	7	_	23%	_
Wisconsin	49	72	76%	82%
Former nonwaiver states	3,789	849	6%	34%
California	3,228	726	3%	31%
Iowa	167	33	26%	39%
Montana	120	30	22%	57%
Nebraska	115	27	20%	63%
North Dakota	86	14	15%	50%
Vermont ^a	12	_	7%	_
Wyoming	73	19	10%	68%

Note: ESSA is Every Student Succeeds Act. —Data are not available. ^a State excluded from the aggregate counts (bolded rows) due to missing or incomplete data for either 2016-17 or 2018-19. Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). The percentage of identified schools in the bottom 5 percent was determined for each state based on the combined school-level averages for English language arts (ELA) and mathematics proficiency. These averages were derived from each state and academic year by averaging school-level proficiency rates across both subjects for all public schools with 10 or more valid scores in both subject areas. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 6,770 of the 6,941 schools identified for the most intensive support in 2016-17 in 50 states, the District of Columbia, and Puerto Rico, and 5,250 of the 5,838 identified schools in 2018-19 in 47 states, the District of Columbia, and Puerto Rico. For waiver states, this exhibit includes 2,812 of the 2,908 identified schools in 2016-17, and 4,401 of the 4,908 identified schools in 2018-19. For nonwaiver states, this exhibit includes 3,958 of the 4,033 identified schools in 2016-17, and 849 of the 930 identified schools in 2018-19. (Schools reporting fewer than 10 valid scores in either ELA or mathematics, or missing proficiency data for either year were excluded from the exhibit.) Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17, "CSI identification," 2018-19, DG 583, "Academic achievement in mathematics," 2016-17 and 2018-19, and DG 584, "Academic achievement in reading/language arts," 2016-17 and 2018-19.

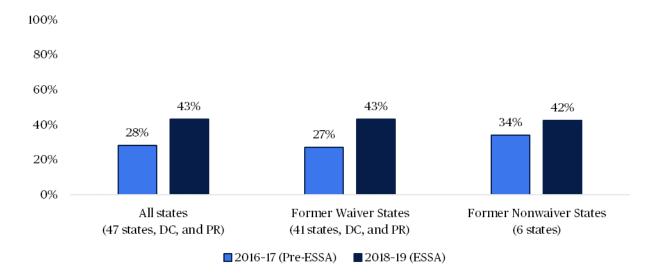
Exhibit C.11. Achievement decile distribution in English language arts and mathematics among schools identified for the most intensive support, by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)

	2016-17 (Pr	e-ESSA)	2018-19 (F	ESSA)
Achievement Decile	Percentage of Identified Schools	Cumulative Percentage	Percentage of Identified Schools	Cumulative Percentage
Former waiver states				
1 (low performing)	59%	59%	59%	59%
2	19%	78%	21%	79%
3	9%	87%	8%	88%
4	5%	92%	5%	93%
5	3%	95%	3%	96%
6	2%	97%	2%	97%
7	1%	98%	1%	98%
8	1%	99%	1%	99%
9	1%	100%	<1%	100%
10 (high performing)	<1%	100%	<1%	100%
Former nonwaiver states				
1 (low performing)	13%	13%	56%	56%
2	18%	32%	20%	76%
3	17%	49%	11%	87%
4	15%	64%	6%	93%
5	11%	75%	3%	96%
6	10%	86%	2%	98%
7	7%	93%	1%	99%
8	5%	97%	<1%	100%
9	2%	99%	<1%	100%
10 (high performing)	1%	100%	<1%	100%

Note: ESSA is Every Student Succeeds Act. Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). To calculate achievement deciles, combined school-level averages for English language arts (ELA) and mathematics proficiency were first determined by averaging the proficiency rates across both subjects among all public schools with 10 or more valid scores in both subject areas. For each state and academic year, school-level averages were then ranked, divided into 10 equal groups, and assigned to one of the deciles. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. For waiver states, this exhibit includes 2,760 of the 2,884 identified schools in 2016-17, and 4,401 of the 4,908 identified schools in 2018-19. For nonwaiver states, this exhibit includes 3,789 of the 4,033 identified schools in 2016-17, and 849 of the 930 identified schools in 2018-19. (Schools reporting fewer than 10 valid scores in either ELA or mathematics, or missing proficiency data for either year were excluded from the exhibit.) The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19, and Vermont and West Virginia due to missing proficiency data for 2018-19. Due to missing 2016-17 data for Utah, the count of priority schools in each decile is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17, "CSI identification," 2018-19, DG 583, "Academic achievement in mathematics," 2016-17 and 2018-19, and DG 584, "Academic achievement in reading/language arts," 2016-17 and 2018-19.

Exhibit C.12. Percentage of schools in the bottom 5 percent for English language arts and mathematics proficiency that were identified for the most intensive support, by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)



Note: DC is District of Columbia; ESSA is Every Student Succeeds Act; PR is Puerto Rico. Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). The percentage of identified schools in the bottom 5 percent was determined for each state based on the combined school-level averages for English language arts (ELA) and mathematics proficiency. These averages were derived from each state and academic year by averaging school-level proficiency rates across both subjects for all public schools with 10 or more valid scores in both subject areas. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. For waiver states, this exhibit includes 3,851 schools in the bottom 5 percent in 2016-17 and 3,850 schools in the bottom 5 percent in 2018-19. For nonwaiver states, this exhibit includes 678 schools in the bottom 5 percent in 2016-17 and 687 schools in the bottom 5 percent in 2018-19. (Schools reporting fewer than 10 valid scores in either ELA or mathematics, or missing proficiency data for either year were excluded from the exhibit.) Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state. Source: EDFacts, "Improvement status," 2016-17, "CSI identification," 2018-19, DG 583, "Academic achievement in mathematics," 2016-17 and 2018-19, and DG 584, "Academic achievement in reading/language arts," 2016-17 and 2018-19.

Exhibit C.13. Number of schools identified for the most intensive support, by waiver status, state, and concentration of low-income students and students of color, 2016-17 (pre-ESSA)

	Perce		udents Eligi PRL	ible for	Percentage of Black or Hispanic Students					
	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)		
All states	85	449	1,382	3,975	1,034	660	1,224	3,981		
Former waiver states	29	58	429	1,578	382	217	408	1,860		
Alabama ^a	_		_	_	0	3	1	38		
Alaska	0	0	1	15	16	0	0	0		
Arizona	3	5	7	29	18	6	13	17		
Arkansas ^a	_	-	_	_	0	1	3	33		
Colorado	0	0	2	24	1	1	3	21		
Connecticut	0	4	16	18	1	0	3	34		
Delaware ^a	_	_	-	_	0	1	3	4		
District of Columbia ^a	_	_	_	_	0	0	0	29		
Florida	0	3	42	96	2	17	31	91		
Georgia	0	2	5	64	0	3	6	62		
Hawaii	0	0	6	4	10	0	0	0		
Idaho	0	2	7	8	7	8	2	0		
Illinois	3	5	12	110	2	3	13	112		
Indiana	2	10	67	88	41	34	45	67		
Kansas	0	0	0	32	0	1	15	16		
Kentucky	0	0	14	9	5	6	10	2		
Louisiana ^a	_	_	-	_	0	0	1	59		
Maine	0	4	11	9	22	1	1	0		
Maryland ^a	_	_	-	_	0	0	1	23		
Massachusetts ^a	_	_	_	_	1	2	5	27		
Michigan	0	3	50	80	19	13	43	99		
Minnesota	0	0	9	34	14	6	8	15		
Mississippi	0	0	0	29	0	0	1	28		
Missouri	2	0	1	57	0	0	3	57		
Nevada	0	4	1	21	0	5	1	20		
New Hampshire	1	5	9	4	12	5	2	0		
New Jersey	1	0	18	40	0	0	0	59		
New Mexico	0	1	2	30	7	3	6	17		
New York	0	0	41	142	2	2	22	157		
North Carolina	0	1	11	122	8	9	24	93		

	Perce		udents Eligi PRL	ible for	Percentage of Black or Hispanic Students					
	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)		
Ohio ^a	-	_	-	_	10	14	14	80		
Oklahoma ^a	_	_	_	_	89	20	55	51		
Oregon	0	1	14	18	10	11	10	2		
Pennsylvania	0	0	4	61	2	5	9	61		
Puerto Rico	0	0	0	71	0	0	0	71		
Rhode Island	0	0	4	16	2	1	1	16		
South Carolina ^a	-	_	_	_	0	0	1	14		
South Dakota	4	0	0	25	27	0	0	2		
Tennessee ^a	-	_	_	_	0	0	1	71		
Texas	1	1	41	200	2	7	14	220		
Utah	0	1	6	4	6	4	4	2		
Virginia	0	1	5	30	0	3	3	30		
Washington	12	9	33	49	39	21	25	18		
West Virginia ^a	_	_	_	_	28	2	0	0		
Wisconsin	0	0	1	48	1	0	6	42		
Former nonwaiver states	56	391	953	2,397	652	443	816	2,121		
California	19	205	767	2,276	90	330	757	2,092		
Iowa	7	37	70	55	76	53	34	6		
Montana ^a	-	-	-	_	133	1	0	0		
Nebraska	3	16	39	51	43	29	25	23		
North Dakota ^a	-	-	-	_	81	6	0	0		
Vermont	19	92	54	7	172	1	0	0		
Wyoming	8	41	23	8	57	23	0	0		

Note: ESSA is Every Student Succeeds Act. FRPL is free or reduced-price lunch.

Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 50 states, the District of Columbia, and Puerto Rico. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17; CCD, 2016-17.

[—]State missing data on the number of students eligible for FRPL for at least 50 percent of schools identified for the most intensive support and/or all public schools.

^a State excluded from the aggregate counts (bolded rows) for the percentage of students eligible for FRPL due to missing or incomplete data for either 2016-17 or 2018-19. (Although this exhibit focuses on 2016-17, it serves to supplement Exhibit 7, which requires complete data for both years.)

Exhibit C.14. Number of schools identified for the most intensive support, by waiver status, state, and concentration of low-income students and students of color, 2018-19 (ESSA)

	Percer	_	ıdents Eligi RPL	ble for	Percentage of Black or Hispanic Students						
	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)			
All states	138	433	1,196	2,658	1,095	773	1,027	2,862			
Former waiver states	127	365	964	2,105	938	651	834	2,410			
Alabama ^a	_	_	-	_	1	2	4	52			
Alaska	2	7	4	42	82	1	0	O			
Arizona	0	7	38	93	47	25	38	86			
Arkansas ^a	_	_	_	_	2	0	5	34			
Colorado	14	14	37	49	23	23	26	43			
Connecticut	0	0	4	32	0	0	2	34			
Delawarea	_	-	-	_	0	0	2	6			
District of Columbia ^a	_	_	_	_	0	0	0	18			
Florida	40	52	181	249	24	102	160	244			
Georgia	3	5	12	81	5	10	11	76			
Hawaii	2	2	9	5	17	1	0	O			
Idaho	11	22	18	9	41	22	4	2			
Illinois	0	12	41	144	23	8	30	137			
Indiana	1	20	49	54	47	26	13	50			
Kansas	8	1	12	36	10	7	18	22			
Kentucky	0	1	25	23	10	14	19	6			
Louisiana ^a	-	-	-	_	3	15	50	208			
Marylanda	_	_	_	_	0	1	1	41			
Massachusetts ^a	-	-	-	_	1	4	10	40			
Michigan	1	8	30	108	27	20	10	90			
Minnesota	13	58	67	57	68	57	43	27			
Mississippi	0	0	0	34	0	0	1	33			
Missouri	0	0	8	56	15	1	1	47			
Nevada	2	12	24	75	22	23	28	68			
New Hampshire	0	8	7	4	14	2	4	0			
New Jersey	3	17	41	65	4	11	17	94			
New Mexico	3	4	11	64	11	12	16	43			
New York	5	23	77	140	54	24	30	137			
North Carolina	2	8	9	88	11	9	17	70			
Ohio ^a	_	_	_	_	49	49	66	99			

	Percentage of Students Eligible for FRPL			Percentage of Black or Hispanic Students				
	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)	Low (0 to <25%)	Mid-Low (25 to <50%)	Mid-High (50 to <75%)	High (75 to 100%)
Oklahoma ^a	_	_	_	_	45	10	24	21
Oregon	0	6	28	35	51	12	23	4
Pennsylvania	1	6	4	84	7	11	12	68
Puerto Rico	0	0	0	68	0	0	0	68
Rhode Island	0	0	6	17	1	4	4	15
South Carolina ^a	_	_	_	_	5	8	11	21
South Dakota	1	1	0	18	21	0	0	0
Tennessee ^a	_	_	_	_	2	1	3	90
Texas	0	19	111	195	24	36	72	193
Utah	1	12	16	14	24	19	16	3
Virginia	0	1	1	36	0	4	5	30
Washington	12	37	87	65	108	74	33	26
West Virginia ^a	_	_	_	_	32	2	1	0
Wisconsin	2	2	7	65	7	1	4	64
Former nonwaiver states	11	68	232	553	157	122	193	452
California	9	50	203	511	49	101	180	445
Iowa	1	6	12	15	13	13	6	2
Montana ^a	_	_	_	_	39	0	0	0
Nebraska	1	0	7	14	10	5	7	5
North Dakota ^a	-	_	-	_	14	0	0	0
Vermont	0	8	4	3	14	1	0	0
Wyoming	0	4	6	10	18	2	0	0

Note: ESSA is Every Student Succeeds Act. FRPL is free or reduced-price lunch.

Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 49 states, the District of Columbia, and Puerto Rico. This exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19. Schools identified for the most intensive support in 2018-19 refer to schools identified for CSI.

Source: EDFacts, "CSI identification," 2018-19; CCD, 2018-19.

⁻State missing data on the number of students eligible for FRPL for at least 50 percent of schools identified for the most intensive support and/or all public schools.

^a State excluded from the aggregate counts (bolded rows) for the percentage of students eligible for FRPL due to missing or incomplete data for either 2016-17 or 2018-19. (Although this exhibit focuses on 2016-17, it serves to supplement Exhibit 7, which requires complete data for both years.)

Exhibit C.15. Percentage of schools identified for the most intensive support, by concentration of low-income students, overall and by waiver status, 2016-17 (pre-ESSA) and 2018-19 (ESSA)

	Percentage of Identified Schools With at Least 40 Percent of Students Eligible for FRPL in 2016-17 (Pre-ESSA)	Percentage of Identified Schools With at Least 40 Percent of Students Eligible for FRPL in 2018-19 (ESSA)	Percentage Point (pp) Change in Percentage of Identified Schools With at Least 40 Percent of Students Eligible for FRPL Between 2016-17 (Pre-ESSA) and 2018-19 (ESSA)
All states	95%	92%	-3 pp
Former waiver states	98%	92%	-6 pp
Former nonwaiver states	94%	95%	+1 pp

Note: ESSA is Every Student Succeeds Act; FRPL is free or reduced-price lunch.

Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools identified for the most intensive support in 2018-19 refer to schools identified for Comprehensive Support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 36 states and Puerto Rico. The exhibit excludes Maine due to missing data on the number of schools identified as CSI in 2018-19, as well as Alabama, Arkansas, Delaware, District of Columbia, Louisiana, Massachusetts, Maryland, Montana, North Dakota, Ohio, Oklahoma, South Carolina, Tennessee, and West Virginia due to missing data on the number of students eligible for FRPL for at least 50 percent of schools identified for the most intensive support in 2016-17 and/or 2018-19. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

Source: EDFacts, "Improvement status," 2016-17, and "CSI identification," 2018-19; CCD, 2016-17 and 2018-19.

Exhibit C.16. Percentage of schools identified for the most intensive support with high concentrations of low-income students and students of color, by waiver status and state, 2016-17 and 2018-19

	Most Intensive St Concentrations of S	ols Identified for the apport With High Students Eligible for APL	Percentage of Schools Identified for the Most Intensive Support With High Concentrations of Students of Color		
	2016-17	2018-19	2016-17	2018-19	
All states	67%	60%	58%	50%	
Former waiver states	75%	59%	65%	50%	
Alabama	-	_	90%	88%	
Alaska	94%	76%	0%	0%	
Arizona	66%	67%	31%	44%	
Arkansas	_	_	89%	83%	
Colorado	92%	43%	81%	37%	
Connecticut	47%	89%	89%	94%	
Delaware	-	-	50%	75%	
District of Columbia	-	-	100%	100%	
Florida	68%	48%	65%	46%	
Georgia	90%	80%	87%	75%	
Hawaii	40%	28%	0%	0%	
Idaho	47%	15%	0%	3%	
Illinois	85%	73%	86%	69%	
Indiana	53%	44%	36%	37%	
Kansas	100%	63%	50%	39%	
Kentucky	39%	47%	9%	12%	
Louisiana	-	-	98%	75%	
Mainea	38%	-	0%	_	
Maryland	-	-	96%	95%	
Massachusetts	_	_	77%	73%	
Michigan	60%	73%	57%	61%	
Minnesota	79%	29%	35%	14%	
Mississippi	100%	100%	97%	97%	
Missouri	95%	88%	95%	73%	
Nevada	81%	66%	77%	48%	
New Hampshire	21%	21%	0%	0%	
New Jersey	68%	52%	100%	75%	
New Mexico	91%	78%	52%	52%	
New York	78%	57%	86%	56%	

	Most Intensive S Concentrations of	ools Identified for the Support With High Students Eligible for RPL	Percentage of Schools Identified for the Most Intensive Support With High Concentrations of Students of Color		
	2016-17	2018-19	2016-17	2018-19	
North Carolina	91%	82%	69%	65%	
Ohio	-	_	68%	38%	
Oklahoma	_	_	24%	21%	
Oregon	55%	51%	6%	4%	
Pennsylvania	94%	88%	79%	69%	
Puerto Rico	100%	100%	100%	100%	
Rhode Island	80%	74%	80%	63%	
South Carolina	_	_	93%	47%	
South Dakota	86%	90%	7%	0%	
Tennessee	_	_	99%	94%	
Texas	82%	60%	91%	59%	
Utah	36%	33%	13%	5%	
Virginia	83%	95%	83%	77%	
Washington	48%	32%	17%	11%	
West Virginia	_	_	0%	0%	
Wisconsin	98%	86%	86%	84%	
Former nonwaiver states	63%	64%	53%	49%	
California	70%	66%	64%	57%	
Iowa	33%	44%	4%	6%	
Montana	_	-	0%	0%	
Nebraska	47%	64%	19%	19%	
North Dakota	_	-	0%	0%	
Vermont	4%	20%	0%	0%	
Wyoming	10%	50%	0%	0%	

Note: FRPL is free or reduced-price lunch.

Source: EDFacts, "Improvement status," 2016-17, and "CSI identification," 2018-19; CCD, 2016-17 and 2018-19.

⁻State missing data on the number of students eligible for FRPL for at least 50 percent of schools identified for the most intensive support and/or all public schools for either 2016-17 or 2018-19.

^a State excluded from the aggregate counts (bolded rows) due to missing or incomplete data for either 2016-17 or 2018-19. Schools with high concentrations of students eligible for FRPL are defined as those where more than 75 percent of students are eligible for FRPL (NCES, 2023a). Schools with high concentrations of students of color are defined as those where more than 75 percent of students are Black or Hispanic (NCES, 2023b). Schools identified for the most intensive support in 2016-17 include priority schools in waiver states and schools identified for corrective action or restructuring in nonwaiver states. Schools identified for the most intensive support and Improvement (CSI). Because states had the option to include both Title I and non-Title I schools in identifying schools for the most intensive support, the exhibit includes all public schools. The exhibit includes 50 states, the District of Columbia, and Puerto Rico. Due to missing 2016-17 data for Utah, the count of priority schools is based on 2015-16 data for that state.

ENDNOTES

- ¹ For example, states could establish targets that used equal increments of progress each year, had two or three years of the same targets followed by an increase (known as the "stair-step" approach), or a combination of the two.
- ² U.S. Department of Education (2002).
- ³ "Title I schools" are schools that receive funds through Title I, Part A, of ESEA, based on a high percentage of enrolled students who receive free or reduced-price lunch. States had the option to include non-Title I schools in accountability designations for the lowest achieving schools (see Appendix Exhibit A.2).
- ⁴ Hurlburt et al. (2011).
- ⁵ SIG schools also could have been identified for corrective action and restructuring, but examining overlap was beyond the scope of this current report.
- ⁶ Le Floch and Tanenbaum (2016).
- ⁷ Fixing No Child Left Behind Testing and Accountability: Hearing before the Committee on Health, Education, Labor, and Pensions (S. hrg. 114-512) (2015).
- ⁸ McMurrer and Yoshioka (2013).
- ⁹ U.S. Department of Education (2012).
- ¹⁰ States had the option of proposing combined groups of students that could enable small groups to meet the state's minimum *n*. Examples of combined groups included bottom 25 percent of students, high-need students, or historically disadvantaged students.
- ¹¹ Waiver states also were required to identify as a focus school any Title I high school that met the state's criteria for low-graduation-rate schools but was not identified as a priority school.
- ¹² Priority and focus group schools were mutually exclusive categories.
- ¹³ ESSA requires that states "establish ambitious state-designed long-term goals" but does not provide a definition of ambitious. ED's *Frequently Asked Questions* document from June 16, 2017, noted "In cases where the statute does not define a specific term, a State has significant discretion to determine how it will define that term." Teams of peer reviewers approved state ESSA plans, including their proposals for "ambitious" goals.
- ¹⁴ Such designations are often described as summative ratings because they combine performance across all indicators into one overall rating.

- ¹⁵ In the context of school accountability, there is a distinction between measures of proficiency (required under NCLB) and academic achievement (required under ESSA). Proficiency is expressed in terms of the percentage of students who achieve a defined level of knowledge and skills—for example, the skills to be a proficient third-grade reader. Academic achievement may include the percentage of students who are proficient as well as alternative measures of how well students perform. Under ESSA, student achievement measures include academic growth, average performance levels, and scale scores.
- ¹⁶ U.S. Department of Education (2017).
- ¹⁷ For example, if a state has 1,000 Title I schools and uses a composite index to rank-order schools, it would need to set its cut point for CSI status at the score of the 50th lowest performing Title I school. The state could then identify any non-Title I schools that scored at or below that cut point.
- ¹⁸ ED*Facts* is a centralized data collection through which state education agencies submit pre-K through grade 12 data to ED.
- 19 This categorization was informed by the use of these categories in prior publications from ED, including <u>State and Local Implementation of the No Child Left Behind Act, Volume IX</u>—<u>Accountability Under NCLB: Final Report, Baseline Analyses of SIG Applications and SIG-Eligible and SIG-Awarded Schools, and Prevalence of Teachers Without Full State Certification and Variation Across Schools and States.</u>
- ²⁰ National Center for Education Statistics (2023a).
- ²¹ National Center for Education Statistics (2023b).
- These analyses exclude the District of Columbia and 13 states, including Alabama, Arkansas, Delaware, Louisiana, Massachusetts, Maryland, Montana, North Dakota, Ohio, Oklahoma, South Carolina, Tennessee, and West Virginia. After applying these exclusions, missing rates decreased to 8.8 percent and 8.9 percent for all schools in 2016-17 and 2018-19, respectively. For schools identified for the most intensive support, the missing rates were 1.9 percent in 2016-17 and 5.2 percent in 2018-19.
- ²³ Individual profiles are publicly available for the 35 fall 2017 submissions: https://www.air.org/project/state-accountability-under-essa-fall-2017-submissions.
- ²⁴ School-level proficiency rates for each subject were computed independently and subsequently combined using a simple average of the two subjects.
- ²⁵ The selected threshold may be lower than the minimum number of students used for accountability purposes in many states. Consequently, these analyses may encompass schools that were not included under their state's standard accountability rules.
- ²⁶ Accountability experts responsible for reviewing state accountability plans on behalf of ED are known as peer reviewers, and they provide detailed comments on the components of the state plans. These comments provide insight into expert interpretation of the law and reflect the perspective of ED.

REFERENCES

- Fixing No Child Left Behind-Testing and Accountability: Hearing before the Committee on Health, Education, Labor, and Pensions (S. hrg. 114-512), U.S. Senate, 114th Cong. (2015). (testimony of Martin R. West). https://files.eric.ed.gov/fulltext/ED592831.pdf
- Hurlburt, S., Le Floch, K. C., Therriault, S. B., & Cole, S. (2011). *Baseline analyses of SIG applications and SIG-eligible and SIG-awarded schools*. U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance. https://eric.ed.gov/?id=ED519322
- Le Floch, K. C., & Tanenbaum, C. (2016). *Implementing accountability and supports under ESEA flexibility*. U.S. Department of Education, Office of Planning Evaluation and Policy Development, Policy and Program Studies Service. https://eric.ed.gov/?q=%22Tanenbaum+Courtney%22&id=ED613360
- McMurrer, J., & Yoshioka, N. (2013). *States' perspectives on waivers: Relief from NCLB, concern about long-term solutions*. Center on Education Policy. https://eric.ed.gov/?q=social+and+constructivist+and+methods&pg=15343&id=ED555343
- National Center for Education Statistics. (2023a). Concentration of public school students eligible for free or reduced-price lunch. *Condition of Education*. U.S. Department of Education, Institute of Education Sciences. https://nces.ed.gov/programs/coe/indicator/clb
- National Center for Education Statistics. (2023b). Racial/ethnic enrollment in public schools. *Condition of Education*. U.S. Department of Education, Institute of Education Sciences. https://nces.ed.gov/programs/coe/indicator/cge
- U.S. Department of Education. (2002). *Consolidated state application accountability workbook* template, principle 1.1.
- U.S. Department of Education. (2012, August 3). *ESEA flexibility: Frequently asked questions*, Part B-3. https://www.cde.state.co.us/fedprograms/esea-flexibility-faqs
- U.S. Department of Education. (2017). *Accountability under Title I, Part A of the ESEA: Frequently asked questions*. https://edtrust.org/wp-content/uploads/2014/09/ESSA-Accountability-FAQs.pdf
- U.S. Department of Education. (2017, June 16). *Every Student Succeeds Act consolidated state plan: Frequently asked questions*. https://www2.ed.gov/policy/elsec/leg/essa/essastateplansfaqs.pdf