



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

October 24, 2019

Dear Chief State School Officer:

I want to express my appreciation for the work you and your team have done implementing your consolidated State plan under the Elementary and Secondary Education Act of 1965, as amended (ESEA), while also representing the unique needs of your districts, schools, and stakeholders. I also want to take this opportunity to offer some reminders for this school year. As Secretary DeVos said on her recent back-to-school tour, “It is useful, as we begin any new season, to reflect on where we've been, where we are, and importantly, where we want to go.”

*State plan amendments*

As you consider whether to revise your consolidated State plan to best address the educational needs of children in the State, please remember that proposed amendments must be submitted to the U.S. Department of Education (the Department) for review and approval before implementation. This includes any indicator included in your state plan as under consideration or proposed for future use, or that was piloted but not fully described in your approved consolidated State plan, that will now be incorporated in your accountability system. Amendments related to accountability determinations for the 2020-2021 school year should be submitted no later than February 3, 2020, in order to determine whether an amendment complies with applicable statutory and regulatory requirements in time for your State to implement those changes and still make timely accountability determinations.

I encourage you to talk with us as you consider possible changes. My staff are available to provide technical assistance to support you. Prior to submitting an amendment to the Department, you must consult with the Governor, afford a reasonable opportunity for public comment, and consider such comments consistent with the consolidated assurances your State submitted in June 2017 under ESEA section 8304.

When submitting an amendment to the Department for approval, please submit:

- 1) A redlined version of the approved consolidated State plan that reflects all proposed changes, preferably in Microsoft Word;
- 2) A cover letter describing the proposed changes;
- 3) The signature of the chief State school officer or authorized representative; and
- 4) A description of how the State provided the public a reasonable opportunity to comment on the plan.

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<http://www.ed.gov/>

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

### *School identification*

Under ESEA sections 1111(c)(4)(C)(iii), 1111(c)(4)(D), and 1111(d)(2)(C), each State must identify the following discrete categories of schools, which are required to implement a support and improvement plan:

- **Comprehensive support and improvement (CSI) schools**, including:
  - Not less than the lowest-performing 5 percent of Title I schools.
  - All public high schools (Title I and non-Title I) in the State failing to graduate one-third or more of their students.
  - Title I schools that were previously identified for additional targeted support and improvement (ATSI) and have not met the statewide exit criteria for those schools within the State-determined number of years.
- **Targeted support and improvement (TSI) schools**: Public schools (Title I and non-Title I) with one or more subgroups that meet the State’s definition of consistently underperforming.
- **Additional targeted support and improvement (ATSI) schools**: Public schools (Title I and non-Title I) with one or more subgroups performing as poorly as the lowest-performing 5 percent of Title I schools identified for CSI.

The State must notify each local educational agency (LEA) that has one or more schools identified for CSI, TSI, or ATSI, after which the LEA must notify the identified school. Upon receiving notification, the LEA –or each TSI or ATSI school – must develop and implement a support and improvement plan. This plan must be developed in partnership with stakeholders including principals and other school leaders, teachers, and parents. The attached table outlines the requirements for school identification and support and improvement plans.

It is essential that a State meaningfully differentiate and identify schools no later than the beginning of each school year based on the prior year’s data. Timely notifications will ensure schools are able to meet the statutory requirement to develop and, in most cases, implement these plans in the year the schools are identified. More importantly, delayed school identification means that students, teachers, and staff in struggling schools are not receiving the supports and resources they need. As you are aware, your State was required to notify LEAs of any schools identified for CSI and ATSI no later than the beginning of the 2018-2019 school year. Therefore, we expect schools identified for CSI, ATSI, or TSI in the 2018-2019 school year to *implement* approved support and improvement plans in the 2019-2020 school year (*i.e.*, the 2019-2020 school year may not be used as a *planning* year for any schools identified for the 2018-2019 school year).

### *Reporting*

Related to the school identification described above, ESEA sections 1111(h)(1)(C)(i)(V) and 1111(h)(2)(C) require State and local report cards to include the number and names of all public schools identified by the State for comprehensive support and improvement or implementing targeted support and improvement plans. This requirement includes all schools identified in a given year for TSI or ATSI (*i.e.*, the State and local report cards must include the names of any schools that are

developing support and improvement plans, any using the first year of identification as a planning year, and any implementing a support and improvement plan). As part of the Department’s oversight of implementation of the ESEA, we will be reviewing report cards this winter for key information, including school identification information.

*Technical assistance*

To assist you with this important work, there are several available resources provided by our technical assistance partners. The State Support Network (Network) recently supported the State Support for School Identification and Improvement Community of Practice (CoP) for 11 States to share practices and develop resources to support States’ systems for identifying low-performing schools and improving State processes for guiding district and school improvement planning. Resources from this CoP can be found here: <https://statesupportnetwork.ed.gov/resources/state-support-school-identification-and-improvement-community-practice-resources>.

Additionally, the Network has produced several tools and resources to assist schools and districts with assessing improvement needs and identifying evidence-based interventions, including the *Needs Assessment Guidebook*, a tool that describes the elements and implementation phases of an effective needs assessment process, available at <https://statesupportnetwork.ed.gov/resources/needs-assessment-guidebook>, and *Leveraging Evidence-Based Practices For Local School Improvement*, a set of tools designed to help districts identify evidence-based practices as part of ESEA implementation, available at <https://statesupportnetwork.ed.gov/content/leveraging-evidence-based-practices-local-school-improvement>.

Finally, the Center on School Turnaround has produced a number of useful resources, many of which can be found on its website at: <https://www.centeronschoolturnaround.org/tools-publications/>.

As a reminder, the ESEA provides flexibilities for State and local education leaders to best meet the needs of their students. For more information, I encourage you to consult our resource document which highlights available flexibilities at <https://www2.ed.gov/policy/elsec/leg/essa/essa-flexibilities-document-for-publication.pdf>.

Thank you again for the work that you continue to do to implement the ESEA and provide a high-quality education to all students. If you have any questions or need additional information, please contact [OESE.TitleI-A@ed.gov](mailto:OESE.TitleI-A@ed.gov).

Sincerely,

/s/

Frank T. Brogan  
Assistant Secretary for Elementary  
and Secondary Education

Enclosure: School Identification Requirements

cc: State Title I, Part A Directors  
State Title I, Part C Directors  
State Title I, Part D Directors  
State Title II, Part A Directors  
State Title III, Part A Directors  
State Title IV, Part A Directors  
State Title IV, Part B Directors  
State Assessment Directors  
State Directors for McKinney-Vento Homeless Assistance Act: Education for Homeless  
Children and Youths Program

*Other than statutory and regulatory requirements included in the document, the contents of this guidance do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.*

## School Identification Requirements

<b>Category</b>	<b>Description</b>	<b>Plan requirements</b>
<p>Comprehensive support and improvement (CSI) <i>ESEA section 1111(c)(4)(D)(i)</i></p>	<p>Includes three distinct groups of schools:</p> <ul style="list-style-type: none"> <li>(1) Not less than the lowest performing 5 percent of all Title I schools;</li> <li>(2) All public high schools in the State (Title I and non-Title I) failing to graduate one third or more of their students;</li> <li>(3) Title I schools that were previously identified for ATSI and that have not met the statewide exit criteria for those schools within the number of years determined by the State.</li> </ul> <p>These schools must be identified at least every three years.</p>	<p>The LEA must develop a plan that is reviewed and approved by the school, LEA, and State that:</p> <ul style="list-style-type: none"> <li>(1) Is informed by all indicators in the accountability system;</li> <li>(2) Includes one or more evidence-based interventions;</li> <li>(3) Is based on a needs assessment; and</li> <li>(4) Identifies resource inequities to be addressed through implementation of the plan.</li> </ul> <p><i>ESEA section 1111(d)(1)(B)</i></p>
<p>Targeted support and improvement (TSI) <i>ESEA section 1111(c)(4)(C)(iii)</i></p>	<p>Public schools (Title I and non-Title I) with one or more subgroups that meet the State’s definition of consistently underperforming.</p> <p>These schools must be identified annually.</p>	<p>The school must develop a plan that is reviewed and approved by the school and LEA that:</p> <ul style="list-style-type: none"> <li>(1) Is informed by all indicators in the accountability system; and</li> <li>(2) Includes one or more evidence-based interventions.</li> </ul> <p><i>ESEA section 1111(d)(2)(B)</i></p>
<p>Additional targeted support and improvement (ATSI) <i>ESEA section 1111(d)(2)(C)</i></p>	<p>Public schools (Title I and non-Title I) with one or more subgroups performing as poorly as the lowest performing 5 percent of Title I schools identified for CSI.</p> <p>The State determines the frequency with which these schools are identified.</p>	<p>The school must develop a plan that is reviewed and approved by the school and LEA that:</p> <ul style="list-style-type: none"> <li>(1) Is informed by all indicators in the accountability system;</li> <li>(2) Includes one or more evidence-based interventions; and</li> <li>(3) Identifies resource inequities to be addressed through implementation of the plan.</li> </ul> <p><i>ESEA section 1111(d)(2)(C)</i></p>