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IMPLEMENTING CHANGE

Rethinking School
Improvement Strategies
& Funding Under the Every
Student Succeeds Act



Implementing Change:

**Rethinking School Improvement Strategies and
Funding Under the Every Student Succeeds Act
(ESSA)**



May 2016



Chiefs for Change is a nonprofit network of diverse state and district education Chiefs dedicated to preparing all students for today's world and tomorrow's.

We advocate for the policies and practices working for students, facilitate a robust system of peer-to-peer advising among our members, and sustain a pipeline of the next generation of Chiefs.

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EXECUTIVE SUMMARY

The Every Student Succeeds Act (ESSA) requires state education agencies (SEAs) to set aside seven percent of their Title I funding¹ in order to turn around struggling schools identified by states under their accountability systems. Nationwide, this translates to over \$1 billion annually. Under ESSA, states have far greater flexibility to approach school improvement in fundamentally stronger ways, shifting decision-making from the federal government to SEAs and local education agencies (LEAs).

This paper provides guidance for SEAs committed to advancing this newfound local flexibility and innovation, while also incentivizing LEAs to identify and implement evidence-based school improvement strategies and holding them accountable for results.

PROMISING STRATEGIES TO FOSTER SUSTAINED SCHOOL IMPROVEMENT

SEAs should consider viewing the seven percent Title I set aside as a “school improvement innovation fund.” Similar to the [Investing in Innovation Fund](#) “i3” grants, SEAs may reward districts that demonstrate the greatest need and commit to effectively implementing strategies with the strongest evidence. The strategies highlighted below appear to foster sustained student achievement gains and school improvement based on research from various schools and districts across the country.

<p style="text-align: center;">1</p> <p>Focus on instructional quality informed by data.</p>	<ul style="list-style-type: none"> a. Train instructional leaders to observe, practice, and engage in meaningful coaching and feedback sessions with teachers; b. Create effective systems to collect and analyze data about student learning regularly; c. Determine the SEA’s role in developing, approving, and partnering in the development of curricula; and d. Provide opportunities for educators to collaborate and share effective instructional practices based on data.
<p style="text-align: center;">2</p> <p>Provide opportunities for educators to collaborate and share effective instructional practices based on data.</p>	<ul style="list-style-type: none"> a. Develop pipelines of effective instructional leaders; and b. Create career ladders for the most effective teachers that provide opportunities for teacher leadership to support the professional learning of their colleagues.
<p style="text-align: center;">3</p> <p>Prioritize human capital through strategic hiring and professional learning.</p>	<ul style="list-style-type: none"> a. Ensure school leaders have full staffing authority; b. Offer incentives to the most effective principals and teachers to transfer to schools in need of improvement and commit to staying in the community; and c. Create personalized, job-embedded development plans for every educator.

¹ Specifically, 7 percent of their Title I allocation; or the amount of funding reserved for school improvement in fiscal year (FY) 2016 plus the amount of its School Improvement Grants allocation in that year.

<p style="text-align: center;">4</p> <p>Provide additional time through extended day or year models.</p>	<ul style="list-style-type: none"> a. Increase direct instructional time, including <u>time for targeted interventions</u> or intensive students supports; b. Strengthen <u>tutoring and after-school time</u> to focus on evidence and research-based supports; c. Increase high-impact educator <u>professional learning time</u> throughout the school year; and d. Ensure all teachers have <u>common planning time.</u>
<p style="text-align: center;">5</p> <p>Create conditions for empowerment of school improvement.</p>	<ul style="list-style-type: none"> a. Use authority to <u>remove barriers and allow for school-level autonomies</u>, including budget, staffing, and curriculum; b. Allocate <u>funding and resources based on need</u>; and c. Develop systems to <u>support, monitor, and sustain school improvement efforts.</u>

INTRODUCTION

The Elementary and Secondary Education Act (ESEA), newly reauthorized by the Every Student Succeeds Act (ESSA), requires state education agencies (SEAs) to set aside seven percent of their Title I funding² (translating into over \$1 billion annually nationwide) in order to turn around struggling schools identified by states under ESSA’s new accountability system. Although the new system is similar in many ways to the School Improvement Grants (SIG) that existed under prior law, this paper highlights how, under ESSA, states have far greater flexibility to approach school improvement in fundamentally new ways. Specifically, instead of continuing a “top-down” approach in which the federal government drives preferred improvement strategies, ESSA shifts this decision-making to SEAs and local education agencies (LEAs). Decades of research and practice make it clear that what matters the most for school improvement is how well Chiefs handle implementation, rather than whether they do things in a certain way. Federal action has a history of stifling problem-solving and encouraging bureaucratic blame avoidance, often doing more harm than good.

This paper provides guidance for SEAs committed to advancing this newfound local flexibility and innovation, while also incentivizing LEAs to identify and implement evidence-based school improvement strategies and holding them accountable for results. In this sense, SEAs may want to view these funds as a “school improvement innovation fund.” similar to the concept behind [the Investing in Innovation Fund](#) “i3” grants previously authorized under NCLB, and reward those districts that not only demonstrate the greatest need but also the greatest commitment to seeking out strategies with the strongest evidence and implementing them with fidelity.

I. INCORPORATING SCHOOL IMPROVEMENT FUNDS INTO THE STATE SYSTEM OF SCHOOL ACCOUNTABILITY

The challenge facing states and school districts is how best to truly change the trajectory of schools in which too many students are not being prepared to graduate with the skills necessary to succeed in college or a career. The first step in addressing this challenge is identifying those schools where significant change must occur.

² Specifically, 7 percent of their Title I allocation; or the amount of funding reserved for school improvement in fiscal year (FY) 2016 plus the amount of its School Improvement Grants allocation in that year.

Under ESSA, there are two main categories of schools that SEAs must identify for support and improvement; schools in both categories must be identified not less than every three years. The first is Comprehensive Support and Improvement Schools, which include the lowest performing five percent of Title I schools (as determined through the state’s accountability system) as well as high schools with graduation rates below 67 percent. In addition, this category includes schools initially identified for Targeted Support and Improvement (see below) that do not meet the state’s criteria for improving the outcomes of under-performing subgroups within a state-determined number of years.

Once identified, Comprehensive Support and Improvement Schools must develop and implement improvement plans that are informed by the indicators in the state’s accountability system, include evidence-based interventions, identify resource inequities, and are approved by both the district and the SEA.

The second category is Targeted Support and Improvement Schools. This includes schools that have one or more persistently under-performing student subgroup, as determined through the state’s accountability system. These schools must develop and implement improvement plans that are informed by the indicators in the accountability system, include evidence-based interventions, and are approved by the LEA.

It is critical that the school improvement funds available under ESSA are used to support and drive the improvement plans developed for schools that have been identified. In theory, this was the strategy under prior law, but in practice, the success of such efforts has been limited at best. SEAs and LEAs must recognize what has not worked in the past, and look at how to direct these funds in new ways in order to leverage change and incentivize districts and schools to implement, with fidelity, local strategies that have proven successful.

II. LEVERAGING LESSONS FROM SCHOOL IMPROVEMENT GRANTS (SIG)

Impact of SIG Funding

Over the course of the last decade, the impact of the school improvement fund in terms of turning around low-performing schools has been mixed at best. This is often attributed to many districts choosing the least rigorous or disruptive intervention model, the transformation model. A 2016 case study by the U.S. Department of Education found that, of the schools reviewed that were receiving school improvement grants, less than a third had “experienced a visible disruption from past practices”; instead, most schools appeared to be following a more “incremental approach to improvement.”³ The same paper also found that most of the core sample schools evaluated “did not perceive SIG as the primary impetus for the change strategies that had been adopted.” However, the study did find evidence that “chronically low-performing schools can change in some respects, at least in the short term, with a great many efforts to build human capital.”

Similarly, a recent [report](#) from the Century Foundation found that, “while most SIG schools showed greater improvement in student outcomes than similar schools without grants, those relative gains were usually quite modest and may be difficult to sustain after the grants expire.”



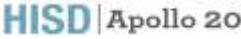



³ Le Floch, K.C., O’Day, J., Birman, B., Hurlburt, S., Nayfack, M., Halloran, C., Boyle, A., Brown, S., Mercado-Garcia, D., Goff, R., Rosenberg, L., and Hulse, L. (2016). *Case Studies of Schools Receiving School Improvement Grants: Final Report* (NCEE 2016-4002). Washington, DC: National Center for Education Evaluation and Regional Assistance, Institute of Education Sciences, U.S. Department of Education.

Promising Strategies

Despite mixed evidence from the last decade of school improvement efforts, there is a growing body of research that points to emerging, promising practices that can guide SEA and LEA work – a specific set of levers that appear to foster sustained school improvement. Importantly, these levers include strong efforts around family/community engagement in order for these to be successful. Below is a set of evidence-based strategies that states and districts can pursue as part of their school improvement efforts based on their local context, though this list is not intended to be exhaustive.

- 1) Focusing on instructional quality informed by data.
 - a. Training for instructional leaders to observe, practice, and engage in meaningful coaching and feedback sessions with teachers;
 - b. Creating effective systems to collect and analyze regularly data about student learning;
 - c. Determining the SEA role in developing, approving, and partnering in the development of curricula; and
 - d. Providing opportunities for educators to collaborate and share effective instructional practices based on data.
- 2) Providing opportunities for educators to collaborate and share effective instructional practices based on data.
 - a. Developing pipelines of effective instructional leaders; and
 - b. Creating career ladders for the most effective teachers that provide opportunities for teacher leadership to support the professional learning of their colleagues.
- 3) Prioritizing human capital through strategic hiring and professional learning.
 - a. Ensuring school leaders have full staffing authority;
 - b. Offering incentives to the most effective principals and teachers to transfer to schools in need of improvement and commit to staying in the community; and
 - c. Creating personalized, job-embedded development plans for every educator.
- 4) Providing additional time through extended day or year models.
 - a. Increasing direct instructional time, including time for targeted interventions or intensive students supports;
 - b. Strengthening tutoring and after-school time to focus on evidence and research-based supports;
 - c. Increasing educator professional learning time throughout the school year; and
 - d. Ensuring all teachers have common planning time.
- 5) Creating conditions for empowerment of school improvement.
 - a. Using authority to remove barriers and allow for school-level autonomies, including budget, staffing, and curriculum;
 - b. Allocating funding and resources based on need; and
 - c. Developing systems to support, monitor, and sustain school improvement efforts.

There are numerous states and districts across the country that have implemented school improvement models that show promise and provide valuable lessons and insight for future efforts under ESSA. While these models differ in their specific approaches, they share an underlying focus on many of the elements identified above, particularly the inclusion of and focus on [human capital](#). Based on their own state context, Chiefs will want to consider how to integrate ideas from these models:

<p>The Achievement School District and Innovation Zones (“iZones”) in Tennessee</p> 	<ul style="list-style-type: none"> • Focuses on turning around the lowest-performing schools by addressing key issues such as governance, talent, and equitable access to schools.
<p>Charlotte-Mecklenburg’s Strategic Staffing Initiative</p> 	<ul style="list-style-type: none"> • Recognizes and rewards high-performing principals and teachers who transfer into high-need schools. • Chooses high-performing principals and allows them to identify a small cohort of other administrators and high-performing teachers with whom to transfer together to a high-need school (see here and here).
<p>Apollo 20 in the Houston Independent School District</p> 	<ul style="list-style-type: none"> • Based on the practices of high-performing charters, Apollo 20 includes data-driven instruction, excellence in teaching and leadership, a culture of high expectations, frequent and intensive tutoring, and an extended school day and year. • Schools that implemented these practices showed strong achievement gains in both reading and math.
<p>Louisiana’s Recovery School District</p> 	<ul style="list-style-type: none"> • Created in the aftermath of Hurricane Katrina. • Credited with providing families with strong choice options and significantly improving student performance. • Similar efforts are underway in Michigan, Georgia, and Pennsylvania.
<p>School Improvement Strategies in Massachusetts</p> 	<ul style="list-style-type: none"> • Has a robust system of school improvement that provides intensive support to the lowest performing schools (see here and here). • Strategic use of human capital, increasing school leader autonomy, refocusing the district to support turnaround, and directing resources toward instruction and professional practice. • Only when efforts fail to demonstrate progress does the state take action. • To date, over a third of schools implementing these practices have shown measurable gains and exited improvement status.
<p>P-Tech in New York City</p> 	<ul style="list-style-type: none"> • Schools partner with businesses to pair students with an industry mentor and facilitate internships that lead to real career opportunities upon graduation. • Early evidence suggests these efforts are supported by families and are having a positive impact on student outcomes, attendance, and graduation rates.

Moving Forward

The underlying need to support struggling schools is the same today as it was under NCLB. It is simply not enough for states to identify low-performing schools and expect that, without a clear vision for success and what needs to change, they will turn around on their own. ESSA provides an opportunity for Chiefs to meaningfully engage stakeholders to advance a vision for improving school success and student outcomes in deliberate ways that meet the expectations and requests of parents and families. Chiefs will want to be clear about what they see as the SEA’s role in advancing student outcomes, as well as what types of supports and resources they expect the SEA to provide. ESSA provides states the opportunity to drive significant resources to low-performing schools, while also enhancing flexibility for states and districts to make their own decisions about what school improvement activities to implement.

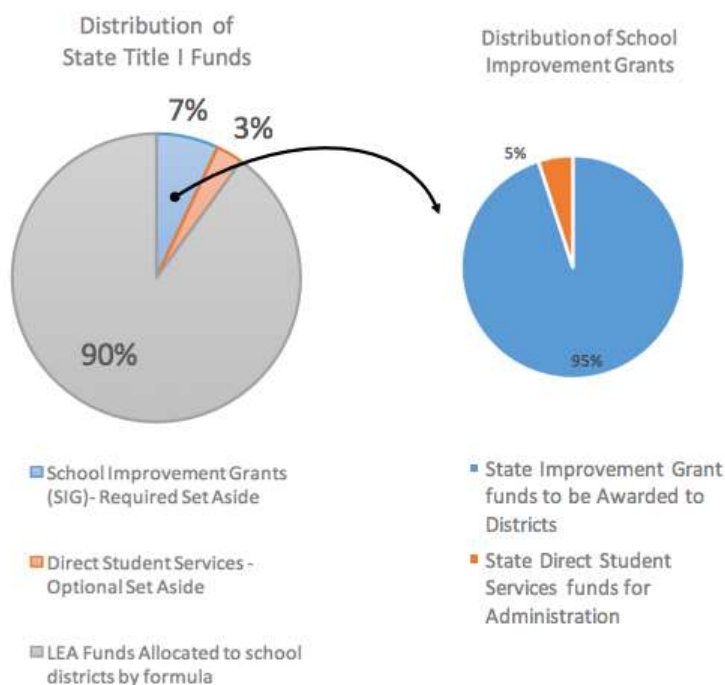
It is up to state leaders to leverage this new flexibility effectively, by establishing a state-driven School Improvement Innovation Fund for example, in order to create the conditions under which

the activities supported with these funds will prove more successful than they have in the past. For this to happen, SEAs must work closely with LEAs to identify interventions that are rigorous and evidence-based; provide the necessary level of funding and incentives; ensure ongoing support and monitoring throughout implementation; and communicate the need for a strong commitment on the part of LEAs to continue reforms beyond the period when school improvement innovation funds are made available.

III. OVERVIEW OF SCHOOL IMPROVEMENT FUNDS UNDER ESSA

ESSA SIG Funding Distribution

As illustrated in the diagram below, SEAs must reserve seven percent of their Title I allocation for school improvement.⁴ This is in addition to the three percent that SEAs may reserve for Direct Student Services (DSS) [See Chiefs for Change analysis of [DSS](#) for more information]. Within the seven percent set-aside for school improvement, SEAs may reserve up to five percent for administration of the program, including activities such as monitoring, and must distribute the remaining funds to LEAs by formula or competition.



⁴ Specifically, 7 percent of their Title I allocation; or the amount of funding it reserved for school improvement in fiscal year (FY) 2016 plus the amount of its School Improvement Grants allocation in that year.

School Improvement Funds Available Under ESSA vs. NCLB

As highlighted in the chart below, the amount of funding available for states to support school improvement is distributed differently than under NCLB, allowing for a slightly greater amount of total funding than was available in the last year of NCLB.

SY 2015-16 (NCLB)	SY 2016-17 (NCLB)	SY 2017-18 (ESSA) ⁵
4 percent State Set-Aside of Title I = up to \$576 million	4 percent State Set-Aside of Title I = up to \$596 million ⁶	7 percent State Set-Aside of Title I = \$1.07 billion (est.)
SIG Grant = \$505 million	SIG Grant = \$450 million	(No separate SIG Grant)
Total = \$1.08 billion	Total = \$1.04 billion	Total = \$1.07 billion (est.)

School Improvement Funding Under ESSA in a Nutshell

- ✓ All SEAs must reserve seven percent of their Title I funds for school improvement grants;
- ✓ There is no longer a separate, federal SIG grant program;
- ✓ SEAs may retain no more than five percent of the school improvement funds to carry out certain activities to implement and monitor grants;
- ✓ SEAs must distribute at least 95 percent of funds, either competitively or by formula, to districts to support schools which are among the lowest achieving in the state or have consistently underperforming student subgroups, as identified under ESSA;
- ✓ LEAs serving the highest number or percentage of identified schools must be given a priority for funding; and
- ✓ There are no longer any federal criteria regarding required interventions or models that school improvement funds must be used to support.

School Improvement Under ESSA Compared to Prior Law

Many aspects of school improvement funding under ESSA are consistent with language under NCLB. However, there are several notable exceptions, including:

- Under ESSA, all funds for school improvement come from the Title I set-aside; there is no longer a separate school improvement grant program.
- Under ESSA, there is no longer a cap on the amount of funding any single LEA may receive.
- Under ESSA, the Secretary is expressly prohibited from mandating “any specific school support and improvement strategies or activities.”

⁵ Specifically, 7 percent of each state’s Title I allocation or the amount of funding reserved for school improvement in fiscal year (FY) 2016 plus the amount of its School Improvement Grants allocation in that year. Also, note that beginning in FY 2018, an SEA may not set aside the full 7 percent of funds if doing so would result in any LEAs within the state receiving a lower Title I allocation than it received in the previous year. Thus, the full 7 percent will be available to SEAs in FY 2017 (the first year in which the new authority will be available) but, beginning in FY 2018 and depending on the level of Title I appropriations and other factors, an SEA may need to reserve less than 7 percent in order to keep its LEAs from losing Title I funding.

⁶ Note that due to a hold harmless provision under NCLB, this number is actually lower.

Note: A chart comparing each of the key provisions between school improvement funding under NCLB and ESSA can be found in Appendix A.

The practical impact of these changes is that SEAs will no longer be required to submit an application for school improvement grants, and the U.S. Department of Education (ED) will presumably play a smaller role in identifying the types of innovations and strategies that are supported with federal funding. This places a far greater responsibility on the SEAs to ensure federal funds are being used in ways that maximize their potential to truly turn around low-performing schools.

IV. STRATEGIES FOR EFFECTIVE IMPLEMENTATION OF “SCHOOL IMPROVEMENT INNOVATION FUND”

“Billion Dollar School Improvement Innovation Fund”

Under ESSA, an SEA must set aside the greater of: seven percent of its Title I allocation; or the amount of funding it reserved for school improvement in fiscal year (FY) 2016 plus the amount of its School Improvement Grants allocation in that year. In most states the set-aside is likely to be seven percent of Title I funding. Combined across all states, this likely equates to over \$1 billion annually for school improvement investments.⁷

States may begin to set aside this seven percent beginning in FY17, for school year 2017-18. Under [ED guidance released on March 29th, 2016](#) as part of the FY15-16 SIG application, states may continue to fund prior year SIG awards with their seven percent set-aside, or support a new competition for new grants to districts based upon the expanded flexibility provided under ESSA. A timeline with the details for the transition of SIG under NCLB to the new school improvement funds under ESSA is included in Appendix B.

Although SEAs have the option to continue SIG awards, they should view this new set-aside as an opportunity to drive meaningful change in schools facing the greatest challenges. Instead of passing down federal requirements of how best to address this challenge, SEAs should incentivize the effective use of these funds by establishing an “innovation fund” whereby districts must instead demonstrate how they will identify and implement strategies that have the strongest evidence of past success.

Leveraging State Set-Aside to Establish and Oversee “School Improvement Innovation Fund”

Under the statute, SEAs may reserve up to five percent of the seven percent school improvement set-aside for state-level activities. The law specifically authorizes SEAs to use these funds to:

- Establish the state’s method for allocating funds to LEAs;
- Monitor and evaluate the use of funds under the program; and
- As appropriate, reduce barriers and provide operational flexibility to schools in the state that are implementing comprehensive and targeted assistance plans.

⁷ IBID



POINT FOR CONSIDERATION

SEAs may want to consider using a portion of their set-aside to establish the criteria, review process, and on-going monitoring of a “School Improvement Innovation Fund.” For such a fund to be successful, states must play a significant role in supporting LEAs willing to identify and implement evidence-based improvement strategies. In addition, SEAs will need to provide scrutiny of applications, potentially including the establishment of a peer-review process, to ensure LEAs are truly able to carry out such strategies. SEAs should also consider targeting a portion of these resources to undertake meaningful monitoring and evaluation of LEA awards, including using peer monitoring, so that LEAs are supported in their efforts to improve teaching and learning. Consistent monitoring and evaluation will also help to expand the broader evidence-base around school improvement activities.

Awarding “School Improvement Innovation Funds” to Districts

SEAs must allocate at least 95 percent of their school improvement set-aside to districts, *except that*, with the approval of an LEA, an SEA may arrange for the direct provision of school activities and services through such entities as school support teams, educational service agencies, or non-profit or for-profit external providers that have expertise in using evidence-based strategies to improve student achievement, instruction, and schools.



POINT FOR CONSIDERATION

An SEA should consider whether, and in what circumstances, it would make sense to work with LEAs on an arrangement through which the SEA retains program funding, rather than sending it directly to the LEA, and provides services through a third-party organization. Smaller and rural LEAs, LEAs clustered in regional areas with large numbers of schools impacted, or LEAs that lack technical capacity might be particularly good candidates for this type of arrangement, rather than trying to mount a comprehensive improvement program on their own. Other factors, specific to each state, should also be considered.

SEAs may also want to consider the extent to which they promote the direct provision of services in cases where schools that have been identified under the statewide accountability system are subject to more direct state intervention.

Competitive vs. Formula

Under ESSA, SEAs may distribute the 95 percent portion of school improvement set-aside funds to LEAs through a formula or on a competitive basis.

The list below describes the pros and cons of making formula grants versus using a competitive process to allocate school improvement funds to LEAs. Note that, while it may be a common conception that only competition ensures program quality and formula grants provide all eligible applicants with funding whether or not they can mount a quality effort, SEAs can create program parameters designed to ensure that formula grant funds are spent effectively. For instance, SEAs can establish a system whereby only LEAs whose plans meet a certain quality threshold would receive a formula allocation.

Pros and cons of formula grants:

- *Pro:* Ensures that each LEA with a school (or schools) in improvement status receives some support for its efforts to improve teaching and learning.
- *Pro:* Likely a more efficient process than going through competition (less paperwork and burden, grants are likely to go out more quickly).
- *Pro:* Does not disadvantage LEAs (such as smaller, rural, and poorer LEAs) that do not have the infrastructure in place to put together a strong application.
- *Con:* Can result in many LEAs receiving funding amounts that are too small to mount a credible school improvement effort (although the statute calls for each grant to be of sufficient size to enable the LEA to implement services effectively).
- *Con:* Unless managed very carefully, can result in LEAs receiving funding whether or not they are prepared to implement an effective school improvement strategy.

Pros and cons of competitive grants:

- *Pro:* Should ensure that only high-quality efforts receive funding.
- *Pro:* Ensures that all grants are of sufficient size to support meaningful strategies to improve teaching and learning.
- *Pro:* Likely to result in fewer grants, which may make it easier for the SEA to monitor and support.
- *Con:* More time consuming and costly (because of peer review).
- *Con:* Disadvantages districts that have less capacity to develop a strong application, which could be the districts with the greatest need.

Requirements for Awarding Grants to Districts

In awarding school improvement funds to districts under ESSA, SEAs must abide by several criteria and limitations, including:

- 1) *The grants may be for a period of up to four years, which may include a planning year.*



POINT FOR CONSIDERATION

SEAs should carefully consider the appropriate length of time for school improvement funding grants. A shorter period may not provide enough time for the implementation of a school improvement plan and the demonstration of meaningful results. On the other hand, providing longer grants may remove the incentive for LEAs to implement their programs expeditiously. One potential solution is to make four-year grants, but tie funding in the third and fourth years to an LEA demonstrating measurable progress during the first two. Another issue is how long the SEA wants to tie up its school improvement funding with the initial group of districts that receive grants. If the Title I appropriation does not increase significantly from year to year, then the school improvement set-aside will be fairly stable and an SEA, if it makes four-year grants, may not be able to make new grants in years 2, 3, and 4 even if new schools are identified for improvement during that time.

States should also consider that sufficient planning time to implement major changes at the school and district level can help ensure fidelity during implementation.

2) Grantees must reflect the geographic diversity of the state.

POINT FOR CONSIDERATION

SEAs electing to establish a school improvement innovation fund may find that, by setting a higher bar for receiving funds, some LEAs find it difficult to compete. This could be a particular issue for those districts, including some in rural areas, with limited resources or capacity. SEAs should recognize this issue and work proactively to identify ways in which these LEAs can meet the criteria for receiving funding. Such efforts would likely also help states meet the requirement that grantees reflect the geographic diversity of the state.

3) Grants must be of sufficient size to enable the LEA to implement “selected strategies” effectively.

POINT FOR CONSIDERATION

Under NCLB, there were statutory limitations on the size of SEAs’ per-school School Improvement Grant allocations to districts; ESSA leaves this issue to the states. It is important that SEAs ensure that each LEA receives enough funding to support the activities called for in its schools’ comprehensive and targeted improvement plans. SEA staff should carefully review districts’ applications (whether submitted under a formula or competitive process) to ensure that all LEAs will receive enough funding to support effective efforts to improve teaching and learning. The opportunity provided by the set-aside will be lost if funds are spread too thinly to do any good. States can also encourage LEAs to develop targeted strategies, such as a sequencing approach that begins with schools facing similar challenges or those that are geographically close to each other, which maximize the potential of resources.

4) The SEA may also allocate subgrants to a statewide school district, consortium of LEAs, or an educational service agency that serves schools implementing comprehensive support and improvement activities or targeted support and improvement activities, but only to the extent that such entities are legally constituted or recognized as LEAs in the state.

5) The SEA must give priority to districts that:

- *Serve high numbers or percentage of schools implementing comprehensive support and improvement or targeted support and improvement plans;*
- *Demonstrate the greatest need for the funds as determined by the state; and*
- *Demonstrate the strongest commitment to using the funds to enable the lowest-performing schools to improve student achievement and other student outcomes.*

Although these priorities are largely adapted from the SIG program under NCLB (see Appendix A), there will no longer be regulations that define “strongest commitment” as an LEA’s commitment to implement one of several federally specified models. Nor will ED establish priorities based on whether schools fit within particular “tiers.” Thus, and assuming no new regulation in this area, SEAs will need to establish their own definitions of “high numbers or percentages,” “greatest need,” and “strongest commitment,” and then operationalize those terms through the grant-making process.

In prioritizing grants, SEAs might consider the relative priority to attach to schools undergoing comprehensive improvement versus those implementing targeted improvements. They might consider whether districts with the “greatest need” should be those with the highest percentages of children from low-income families or other special-needs children, or LEAs with the fewest local resources to draw on, or LEAs that are geographically isolated or face other special challenges.



POINT FOR CONSIDERATION

SEAs could implement these priorities (and others) as weighted parts of a broader plan to implement a school improvement innovation fund. For instance, LEAs earning more points in a competition could receive proportionately higher allocations. Alternatively, an SEA could impose what are known as “absolute priorities,” which are priorities that determine whether an applicant is eligible to receive a grant; for example, SEAs could determine that *only* LEAs demonstrating the greatest need and the greatest commitment will be eligible to compete or eligible for a formula grant.

Since the statute does not provide additional detail on how a state must structure these priorities or how much weight each one must be given, Chiefs have the flexibility to structure the priorities in a manner that reflects their assessment of the most critical school improvement needs within the state and their overall vision for educational improvement. In doing so, Chiefs should have a clear theory of action to ensure maximum return on investment.

Note, as well, that these priorities can apply whether an SEA makes formula grants or competitive grants. If the state uses the formula approach, there is no requirement that every LEA receive an allocation; the SEA could structure the formula such that only LEAs demonstrating that they meet the priorities receive a grant, or provide relatively larger grants to LEAs meeting the priorities. Providing formula allocations to a subset of LEAs could provide SEAs a path to meet the statutory requirement that each participating LEA receive sufficient funding to implement its school improvement strategies effectively.

Leveraging Local Applications for “School Improvement Innovation Fund”

In addition to the requirements for awarding grants highlighted above, ESSA includes specific criteria for what must be included in local applications. These applications provide another opportunity to shape how funding could be awarded through a state-established school improvement innovation fund.

ESSA requires that local applications, for schools receiving funds under this section, must, at a minimum, include a description of how the LEA will carry out its required school support and improvement activities, including how the LEA will—

- 1) *Develop comprehensive support and improvement plans for schools receiving school improvement funds.*



POINT FOR CONSIDERATION

SEAs may want to build on this requirement by ensuring that LEAs not only develop these plans (as is already required for these schools under the statewide accountability system), but also coordinate their school improvement funds with the activities to be carried out under such plans. SEAs should also consider conditioning their approval of these plans (which is required) on demonstrated coordination with school improvement funds.

Requirements for Comprehensive Support and Improvement plans (under statewide accountability system):

“Must be developed and overseen for any schools identified for improvement under the accountability system. School districts have a leading role in developing these plans for schools in comprehensive support and improvement, and states must approve and monitor the plans. All school improvement plans must:

- *Be informed by all indicators in the statewide accountability system;*
- *Include evidence-based interventions;*
- *Be approved and monitored by the school district (or in the case of comprehensive support and improvement, by the state); and*
- *Result in additional action for underperformance over a period of time.”*

2) Support its schools identified for targeted support and improvement in developing their plans, if the school will use its grant for that purpose;



POINT FOR CONSIDERATION

As noted above, SEAs may want to build on this language to ensure that LEAs are supporting the coordination of these funds with their existing targeted support and improvement plans.

3) Monitor the schools that will receive funding under the grant, including how the district will monitor their plan and take additional action following unsuccessful implementation of such a plan after a number of years determined by the agency.



POINT FOR CONSIDERATION

Because of the importance of schools successfully implementing their improvement plans, SEAs may want to provide specific requirements or expectations for LEA monitoring, including conditions that would result in termination of a grant if the requirements or expectations are not met.

4) Use a rigorous review process to recruit, screen, select, and evaluate any external partners with which the LEA will partner;



POINT FOR CONSIDERATION

School and system improvement efforts are much more likely to succeed if all available resources are coordinated, instead of having staff work in isolation from one another. The SEA may want to work with LEAs to ensure that the efforts funded with school improvement dollars are well aligned with those supported under other federal, state, and local programs, work toward the achievement of a single vision for excellence, and are held to the same accountability standards.

In particular, SEAs may want to require LEAs to show how school improvement funds will work in tandem with other provisions and funding available under ESSA, including:

- ✓ Title II funding, which supports professional development and other efforts to improve the quality, quantity, and diversity of educators using objective measures that can be incorporated into improvement plans;
- ✓ Title III funding, which supports language instruction for English learners;
- ✓ Title IV, which includes funding for the new Student Support and Academic Enrichment Grants, which provide wide flexibility for how funds are spent and could be focused on helping to support strategies identified as part of the school improvement plans; and
- ✓ Provisions regarding data that must be collected at the school and district level, particularly the use of new data elements related to teacher effectiveness and resource allocation.

Where applicable, the school improvement set-aside should also be closely coordinated with the optional Direct Student Services (DSS) set-aside. Although structured very differently, both set-asides focus on improving outcomes for students in the lowest-performing schools and in schools with poor outcomes for student subgroups. The school improvement set-aside will primarily fund LEA efforts to turn around underperforming schools, while DSS will provide new options for the students in those schools and directly address parent and family requests. Because the two funding streams are related and tied to a common goal, Chiefs should think about how they can structure the implementation of the two programs in a complementary and cohesive manner.

- 5) Align other federal, state, and local resources to carry out the activities it supports with funds under the grant;
- 6) As appropriate, modify its practices and policies to provide operational flexibility that enables full and effective implementation of comprehensive and targeted support and improvement plans.



POINT FOR CONSIDERATION

The impact of this provision will likely vary by district, but LEAs will likely need to ensure that their school principals have the flexibility they need (in such areas as staffing, budgeting, and the use of time) to implement their school improvement plans effectively. If LEAs have administrative impediments in place, they should remove them. SEAs may want to work with their LEAs on this issue.

Additional Local Application Criteria to Advance a “School Improvement Innovation Fund” Model

ESSA makes clear that LEAs must submit an application to the SEA “at such time, in such form, and including such information as the State educational agency may require...,” and, “at a minimum,” that must include information on the six criteria highlighted above. This

language also opens the door for SEAs to require districts to provide additional information that can be used to differentiate applications as part of a [competitive-based] school improvement innovation fund.

For example, states may opt to condition funding (or at least the amount of funding) on additional key criteria such as:

- 1) *The extent to which proposed interventions and strategies are evidenced-based and are demonstrated to have an impact on improving student achievement, closing achievement gaps, or improving graduation rates.*

Given that ED will no longer specify a set of school turnaround models that LEAs may implement – and the fact that such top-down approach had limited success under prior law – LEAs have much greater flexibility to select and carry out the activities that they believe are most likely to result in meaningful improvements in student outcomes.

SEAs may embrace this flexibility and allow LEAs to identify and implement those interventions and strategies they deem most appropriate. However, SEAs can require that LEAs provide information on the extent to which such interventions and strategies have evidence of effectiveness.⁸ Similar to the Investing in Innovation (i3) program under NCLB, states could use a “tiered model to align the amount of funding a grantee receives to the strength of the evidence to support its effectiveness and require(ing) that its work be subjected to independent evaluation.”



POINT FOR CONSIDERATION

LEAs may consider developing models that support inter-district choice, in order to increase the achievement of low-SES students and attract high-SES students. Studies indicate that students from high-poverty backgrounds and minority students see stronger academic results when they attend diverse schools. This is largely due to the equity in terms of opportunity and resources, including effective educators, in more diverse schools.

An example of these efforts includes “diverse-by-design” programming, as well as Montessori student-centered educational models. These types of controlled choice initiatives have had a proven impact on school improvement in places such as Lee County, Florida.*

* Michael Alves, Charles Willie and Ralph Edwards, Student Diversity, Choice and School Improvement, (Greenwood Press, 2002).

⁸ For additional background, see: <http://www.brookings.edu/research/papers/2016/02/05-evidence-based-system-opportunities-under-essa-west>

- 2) The extent to which districts will take on challenges in areas such as governance, operations, fiscal management, and programming that reflect a meaningful departure from past or current practice.

POINT FOR CONSIDERATION

ESSA does not include specific requirements that districts take on these oftentimes difficult issues, which have the greatest likelihood of significant disruption from current practice. However, SEAs may want to reward those LEAs willing to do so. Similar to other incentives noted above, SEAs may want to provide “bonus points” on applications or increase the amount of funds made available for LEAs that choose to tackle these issues.

V. CONCLUSION

ESSA creates tremendous new opportunities for SEAs, LEAs, and schools to rethink how best to support and improve their most struggling schools. It recognizes that there is no single strategy or approach that will work in every case or any special formula that can guarantee success. Indeed, history suggests that changing teaching and learning outcomes in these schools takes committed teams, targeted effort, and dedication at all levels. By incentivizing LEAs receiving school improvement funding under ESSA to carry out truly innovative, evidence-based strategies, state Chiefs can help chart a new course for turning around low-performing schools throughout the nation.

APPENDIX A

COMPARISON OF SCHOOL IMPROVEMENT FUNDING BETWEEN NCLB AND ESSA

	No Child Left Behind Act (NCLB)	Every Student Succeeds Act (ESSA)
Source of funding	4 percent of a State’s Title I allocation (but may be limited by district hold-harmless). Separate SIG appropriation, allocated to States by formula.	7 percent of a State’s Title I allocation (but may be limited by district hold-harmless starting in FY 2018).
Estimated amount of funding	\$1.046 billion in FY 2016 (SY16-17)	+\$1.075 billion in FY 2017 (assuming President’s budget) beginning SY17-18
Percentage that must flow through to LEAs	95 percent, unless SEA and LEA jointly decide that the SEA will directly provide or arrange for provision of services.	Same as NCLB.
Method for making allocations to LEAs	Not specified under statute, but Department guidance references “competitive” subgrants under SIG.	The State may make allocations on either a formula or competitive basis.
Which LEAs may receive funding?	LEAs with schools identified for improvement, corrective action, and restructuring. In addition, Federal regulations added additional criteria and targeting requirements to the SIG-appropriated funds. NCLB waivers also required states to use list of “priority” and “focus” schools as SIG-eligible schools.	LEAs with schools identified for comprehensive improvement and support or targeted improvement and support.
Priorities for allocations to LEAs	For set-aside funds: <ul style="list-style-type: none"> - LEAs with the lowest-achieving schools. - LEAs demonstrating the greatest need for the funds. - LEAs demonstrating the strongest commitment to using the funds to enable the lowest-achieving schools to meet their improvement goals. For SIG funds: <ul style="list-style-type: none"> - LEAs demonstrating the greatest need for the funds - LEAs demonstrating the strongest commitment to providing adequate resources to enable the lowest-achieving schools to meet their improvement goals. SIG regulations and appropriations language added additional targeting requirements.	LEAs that: <ul style="list-style-type: none"> - Serve high numbers or a high percentage of schools implementing comprehensive or targeted improvement plans - Demonstrate the greatest need for the funds. - Demonstrate the strongest commitment to using the funds to enable the lowest-achieving schools to improve student achievement and student outcomes.
Geographical distribution	No requirements.	SEA must ensure that LEAs receiving grants represent the geographic diversity of the state.

	No Child Left Behind Act (NCLB)	Every Student Succeeds Act (ESSA)
Size of local allocations	<p>Under the set-aside, not specified.</p> <p>Under the SIG program, between \$50,000 and \$500,000 for each participating school. Appropriations language later increased the maximum to \$2 million per school.</p>	Allotments must be of “sufficient size” to enable the LEAs to effectively implement selected strategies.
Length of LEA grants	<p>Under the set-aside, not specified.</p> <p>Under the SIG program, 1 year, which was renewal for up to 2 more 1-year periods. But appropriations language later changed the maximum to 5 years.</p>	Not more than 4 years which may include a planning year.
Uses of LEA funds	<p>Under the set-aside, to carry out improvement activities in schools identified for improvement.</p> <p>Under the SIG program, to provide assistance for school improvement. Regulations later required that each participating school adopt one of several turnaround models.</p>	To serve schools implementing comprehensive or targeted improvement plans. The Secretary is prohibited from mandating “any specific school support and improvement strategies or activities.”
Uses of SEA funds	<p>Under the set-aside, for carrying out the state’s school and LEA improvement responsibilities, including implementing the SEA’s statewide system of technical assistance and support.</p> <p>Under the SIG program, for administration, evaluation, and technical assistance.</p>	Making allotments to LEAs, monitoring and evaluation, and, as appropriate, reducing barriers and providing operational flexibility to schools in implementing comprehensive and targeted improvement plans.

APPENDIX B

TIMELINE FOR TRANSITION TO ESSA SCHOOL IMPROVEMENT

*With extensions per Title I funding rules

	SIG Program Under NCLB			School Improvement Funds Under ESSA			
	FY14	FY15	FY16	FY17	FY18	FY19	FY20
	SY 14-15	SY 15-16	SY 16-17	SY 17-18	SY 18-19	SY 19-20	SY 20-21
Dept. of ED SIG Application	Based on 2014 Application	Single Application for both FY 15 and FY16 – (Submitted by State in May 2016)		No longer a federal application			
SIG Funding	\$505 million	\$506 million	\$450 million	No longer authorized nor expected to be funded			
State Set-Aside	4% Title Set-Aside (Hold Harmless)	4% Title I Set-Aside (Hold Harmless)	4% Title I Set-Aside (Hold Harmless)	7% Set-Aside (No Hold-Harmless)	7% Set-Aside (Hold Harmless)	7% Set-Aside (Hold Harmless)	7% Set-Aside (Hold Harmless)
Timeline for Allocations to States		Spring 2016 (as apps approved)	October 2016	July 2017	July 2018	July 2019	July 2020
Available for Obligation through ...		Through September 2017 (SY16-17) Waiver option through 2021	Through September 2018 (SY17-18) Waiver option through 2021	September 30, 2018*	September 30, 2019*	September 30, 2020*	September 30, 2021*
SIG Eligible Schools	Priority/Focus (waiver states) or Tier I, II, or III	2014-15 Priority/Focus (waiver states), (updated schools from march?) or Tier I, II, or III for non-waiver states May support continuation grants or support new grants. Must implement one of the seven SIG models (Transformation, Turnaround, Restart Closure, Evidence-based (IES approved) whole-school reform, Early learning, or State-determined & Secretary approved model)		7% Set-Aside funds may support full implementation of prior SIG awards, limited to a total of 5 years of continuous funding. OR, States may elect to no longer fund SIG grants with the 7% Set-Aside and opt to instead start new awards using ESSA requirements.			
Eligible ESSA Identified Schools	NA	NA	NA	Funds must serve schools implementing “Comprehensive Support and Improvement” or “Targeted Support and Improvement” schools identified through Statewide accountability system. Schools identified not less than every 3 years, beginning with SY 17-18			

APPENDIX C

SCHOOL IMPROVEMENT LANGUAGE UNDER ESSA

SEC. 1003. SCHOOL IMPROVEMENT.

“(a) STATE RESERVATIONS.—To carry out subsection (b) and the State educational agency’s statewide system of technical assistance and support for local educational agencies, each State shall reserve the greater of—

“(1) 7 percent of the amount the State receives under subpart 2 of part A; or

“(2) the sum of the amount the State—

“(A) reserved for fiscal year 2016 under this subsection as in effect on the day before the date of enactment of the Every Student Succeeds Act; and

“(B) received for fiscal year 2016 under subsection (g), as in effect on the day before the date of enactment of the Every Student Succeeds Act.

“(b) USES.—Of the amount reserved under subsection (a) for any fiscal year, the State educational agency—

“(1)(A) shall allocate not less than 95 percent of that amount to make grants to local educational agencies on a formula or competitive basis, to serve schools implementing comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d); or

“(B) may, with the approval of the local educational agency, directly provide for these activities or arrange for their provision through other entities such as school support teams, educational service agencies, or nonprofit or for-profit external providers with expertise in using evidence-based strategies to improve student achievement, instruction, and schools; and

“(2) shall use the funds not allocated to local educational agencies under paragraph (1) to carry out this section, which shall include—

“(A) establishing the method, consistent with paragraph (1)(A), the State will use to allocate funds to local educational agencies under such paragraph, including ensuring—

“(i) the local educational agencies receiving an allotment under such paragraph represent the geographic diversity of the State; and

“(ii) that allotments are of sufficient size to enable a local educational agency to effectively implement selected strategies;

“(B) monitoring and evaluating the use of funds by local educational agencies receiving an allotment under such paragraph; and

“(C) as appropriate, reducing barriers and providing operational flexibility for schools in the implementation of comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d).

“(c) DURATION.—The State educational agency shall award each subgrant under subsection (b) for a period of not more than 4 years, which may include a planning year.

“(d) RULE OF CONSTRUCTION.—Nothing in this section shall be construed as prohibiting a State from allocating subgrants under this section to a statewide school district, consortium of local educational agencies, or an educational service agency that serves schools implementing comprehensive support and improvement activities or targeted support and improvement activities, if such entities are legally constituted or recognized as local educational agencies in the State

“(e) APPLICATION.—To receive an allotment under subsection (b)(1), a local educational agency shall submit an application to the State educational agency at such time, in such form, and including such information as the State educational agency may require. Each application shall include, at a minimum—

“(1) a description of how the local educational agency will carry out its responsibilities under section 1111(d) for schools receiving funds under this section, including how the local educational agency will—

“(A) develop comprehensive support and improvement plans under section 1111(d)(1) for schools receiving funds under this section;

“(B) support schools developing or implementing targeted support and improvement plans under section 1111(d)(2), if funds received under this section are used for such purpose;

“(C) monitor schools receiving funds under this section, including how the local educational agency will carry out its responsibilities under clauses (iv) and (v) of section 1111(d)(2)(B) if funds received under this section are used to support schools implementing targeted support and improvement plans; (D) use a rigorous review process to recruit, screen, select, and evaluate any external partners with whom the local educational agency will partner;

“(E) align other Federal, State, and local resources to carry out the activities supported with funds received under subsection (b)(1); and

“(F) as appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans described in paragraphs (1) and (2) of section 1111(d); and

“(2) an assurance that each school the local educational agency proposes to serve will receive all of the State and local funds it would have received in the absence of funds received under this section.

“(f) PRIORITY.—The State educational agency, in allocating funds to local educational agencies under this section, shall give priority to local educational agencies that—

“(1) serve high numbers, or a high percentage of, elementary schools and secondary schools implementing plans under paragraphs (1) and (2) of section 1111(d);

“(2) demonstrate the greatest need for such funds, as determined by the State; and

“(3) demonstrate the strongest commitment to using funds under this section to enable the lowest-performing schools to improve student achievement and student outcomes.

“(g) UNUSED FUNDS.—If, after consultation with local educational agencies in the State, the State educational agency determines that the amount of funds reserved to carry out subsection (b) is greater than the amount needed to provide the assistance described in that subsection, the State educational agency shall allocate the excess amount to local educational agencies in accordance with—

“(1) the relative allocations the State educational agency made to those agencies for that fiscal year under subpart 2 of part A; or

“(2) section 1126(c).

“(h) SPECIAL RULE.—Notwithstanding any other provision of this section, the amount of funds reserved by the State educational agency under subsection (a) for fiscal year 2018 and each subsequent fiscal year shall not decrease the amount of funds each local educational agency receives under subpart 2 of part A below the amount received by such local educational agency under such subpart for the preceding fiscal year.

“(i) REPORTING.—The State shall include in the report described in section 1111(h)(1) a list of all the local educational agencies and schools that received funds under this section, including the amount of funds each school received and the types of strategies implemented in each school with such funds.”.

APPENDIX D

ESTIMATE OF 7 PERCENT SCHOOL IMPROVEMETN SET-ASIDE FOR EACH STATE BASED UPON FY17 ESTIMATES

Alabama	16,899,988.35
Alaska	2,963,131.64
Arizona	23,415,330.82
Arkansas	11,080,859.23
California	126,296,751.98
Colorado	10,720,398.50
Connecticut	8,828,947.47
Delaware	3,381,798.63
District of Columbia	3,175,028.57
Florida	58,438,964.85
Georgia	37,232,464.36
Hawaii	3,833,009.95
Idaho	4,136,943.37
Illinois	47,816,139.28
Indiana	18,163,356.75
Iowa	6,792,436.28
Kansas	7,828,095.03
Kentucky	15,295,193.69
Louisiana	20,648,112.17
Maine	3,755,023.86
Maryland	15,824,965.59
Massachusetts	16,494,060.10
Michigan	34,367,063.92
Minnesota	11,718,650.65
Mississippi	12,905,184.25
Missouri	16,908,881.50
Montana	3,285,070.18
Nebraska	5,043,705.80
Nevada	8,638,060.20
New Hampshire	3,071,268.62
New Jersey	24,469,083.87
New Mexico	8,025,314.36
New York	81,727,836.12
North Carolina	30,614,648.75
North Dakota	2,599,787.12
Ohio	40,867,550.22
Oklahoma	11,463,970.91
Oregon	10,400,676.65

Pennsylvania	41,291,734.82
Rhode Island	3,603,407.50
South Carolina	17,156,319.11
South Dakota	3,193,661.31
Tennessee	21,583,815.12
Texas	98,484,978.90
Utah	6,317,571.89
Vermont	2,515,625.49
Virginia	18,821,580.75
Washington	16,357,676.37
West Virginia	6,346,060.42
Wisconsin	15,476,677.02
Wyoming	2,474,433.92
American Samoa	1,302,539.70
Guam	1,411,307.94
Northern Mariana Islands	787,321.50
Puerto Rico	28,233,487.59
Virgin Islands	679,527.66
Freely Associated States	70,000.00
Indian set-aside	7,438,719.40
Other	12,511,940.00
Total	1,075,186,140.00