RESTART & RECOVERY
ENTRY AND EXIT GUIDANCE FOR STATES IN SCHOOL YEAR 2020-2021:
CONSIDERING THE OPTIONS

CCSSO
Council of Chief State School Officers ™

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INTRODUCTION

Under the *Elementary and Secondary Education Act* (ESEA), as amended by the *Every Student Succeeds Act* (ESSA), states are required to develop criteria for identifying three categories of schools for receiving support (D'Brot, Lyons, & Landl, 2017):

- Comprehensive Support and Improvement (CSI) schools (at least every three years): schools in the bottom 5 percent of Title I schools for all students; schools with graduation rates lower than 67 percent; or schools designated for Additional Targeted Support and Improvement which are do not exit within a state-determined number of years;

- Targeted Support and Improvement (TSI) schools (annually): schools with "consistently underperforming" subgroups of students, as defined by the state; and

- Additional Targeted Support and Improvement (ATSI) schools: schools with one or more subgroups which, on their own, perform at or below the threshold(s) established for the lowest-performing schools in the state.

Schools identified for CSI, TSI, or ATSI must implement a school-improvement plan focusing on areas of need. These schools also are eligible for federal and state resources to support improvement efforts. To incentivize schools, states must establish rigorous (yet attainable) criteria for schools to exit CSI status within four years or less. ATSI exit requirements are state defined but do not have a statutorily required timeframe. TSI exit requirements are not required, but if included they are locally defined. States also must (a) take additional action for CSI schools which fail to meet exit criteria and (b) identify ATSI schools which fail to meet exit criteria as CSI schools. Especially for states with limited resources, it is essential for state education agency (SEA) leaders to outline appropriate entry and exit criteria when identifying schools for support. It is also essential to keep entry/exit criteria in mind when monitoring implementation of state and local CSI/ATSI interventions.

State leaders are encouraged to design accountability systems that can differentiate among schools with widely varying needs. If an SEA has insufficient data to justify why it identifies schools as needing support, or if the state's accountability system does not effectively differentiate the lowest-performing schools, the schools most in need of support may go without valuable resources. Furthermore, if schools are exited too soon, capacity-building and instructional-improvement efforts may not take root—increasing the likelihood that the same schools will be identified yet again as needing support.

Pandemic-related school closures and related disruptions may reduce the quality and quantity of the data states need to effectively identify and exit CSI/TSI/ATSI schools. COVID-19 disruptions will substantially complicate these processes for many states. The rapid and largely unforeseen spread of the virus has required an an immediate response from states and districts, altering the status quo in many ways:

- a truncated school year (SY) in 2019-2020, leading the ED to waive large-scale assessments used to inform accountability decisions;

- the shift of school priorities for spring 2020; and

- uncertainties about when and how to reopen school in fall 2020, with concerns about the impact on students' SY 2020-2021 experience.

Many states are considering revisions to their procedures for identifying and exiting schools in fall 2021; others are postponing these identification decisions to fall 2022. This paper will discuss different ways to address entry and exit from CSI and ATSI in SY 2020-2021 and the implications of each approach. The authors do not advocate one approach over another. Rather, the most appropriate approach will be state-specific and will depend on (a) the purpose of identification and the state's role in supporting school improvement; (b) the procedures and timeline for determining entry and exit status; and (c) the importance of maintaining the legacy system.

In the sections that follow, this paper will discuss:

waivers, addenda, and amendments;

identification options in a time of missing data due to COVID-19 disruptions;

state approaches for identifying and exiting schools;

considerations for identifying and exiting schools in SY 2020-2021; and

implementation recommendations for making school determinations [1] in SY 2020-20201 and beyond.

WAIVERS AND AMENDMENTS

WAIVERS AND AMENDMENTS

At the conclusion of SY 2019-2020, the ED issued waivers to all states, the District of Columbia, Puerto Rico, and the Bureau of Indian Education for the following ESEA requirements:

- assessment requirements [section 1111(b)(2)] for SY 2019-2020 in reading/language arts, mathematics, science, and English language proficiency; and

- accountability and school identification requirements in sections 1111(c)(4) and 1111(d)(2)(C)-(D) based on SY 2019-2020 data, including school identification for CSI, TSI, and ATSI schools in SY 2020-2021 based on data from SY 2019-2020.

At this time, ED is not inviting waivers for SY 2020-2021. Instead, it expects states will submit requests for one-year updates that are likely to be needed due to COVID-related circumstances affecting relevant sections of ESEA consolidated state plans (e.g., long-term goals, indicators, school-identification methodologies, or timeline changes). The authors anticipate that ED will work closely with states to make adjustments to their plans through a streamlined process. Amendments are intended to address longer-term changes to the system and would require a more in-depth revision process to ESEA consolidated state plans.

Table 1, below, provides a brief description of waivers and amendments for clarification.

TABLE 1 DEFINITIONS OF WAIVERS AND AMENDMENTS.	
TERM	**DESCRIPTION**
Waiver of ESEA requirements	Waivers are required if one or more of the statutory requirements within ESEA cannot be met. States may submit waiver requests to the Secretary of Education (e.g., administering assessments to a sample of students instead of all students). However, ED is currently not considering an invitation of waivers in advance of extenuating circumstances (e.g., school closures) affecting states' ability to comply with ESEA's statutory and regulatory requirements. In addition, there are a number of statutory and regulatory requirements that the Secretary may not waive, such as funding, maintenance of effort, comparable services, and other requirements associated with equity and civil rights.[2]
Amendment to ESEA state plan	Amendments refer to any changes that result in revisions of ESEA consolidated state plans, including changes to indicator weights, N size, data elements, and identification methodologies.[3] Amendments are required for changes over the long term—beyond SY 2020-2021. In contrast, a state may also need to make changes for a single year in SY 2020-2021 due to COVID-related issues for a single year. In either case, an amendment will be required. For temporary one-year changes, we anticipate that the U.S. Department of Education will work closely with states to make adjustments to their plans through a streamlined process.

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[2] See Section 8401 for more information on waiver requests (https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/).
[3] See ED's most recent "Dear colleague letter" from October of 2019 (https://oese.ed.gov/files/2020/02/csso-letter.pdf), which discusses amendments.).

IDENTIFICATION OF MISSING DATA

EXPLORING SCHOOL DETERMINATIONS IN LIGHT OF MISSING DATA

As noted above, due to COVID-19 related school closures, states are missing many data elements that will have implications for SEAs' school determinations in SY 2020-2021. States wishing to revise their procedures for identifying and exiting schools face three formidable challenges, each of which affects the validity, reliability, and fairness of their decisions:

1. how to address missing spring 2020 data;

2. how to evaluate the quality and appropriateness of data collected in SY 2020-2021 and the prior years for making inferences about schools in spring 2021; and

3. how to assess within-year and across-year comparability of accountability system indicators and school ratings.

All states received federal waivers to forego spring 2020 testing, and many states suspended or cancelled other data-collection events on which accountability decisions depend (e.g., school quality surveys, fourth-quarter attendance). Because all states must contend with at least some missing data, a return to established timelines and criteria for entry and exit decisions may not be viable or defensible in spring 2021. As a result, states will need to decide whether to pursue the possibility of postponing school determinations in SY 2020-2021. A state's position in this regard—in combination with its current timeline for identification— will determine whether the SEA opts to submit a waiver, one-year amendment, or longer-term amendment for federal approval.

State leaders also will need to consider whether to implement one of the following types of accountability systems (see D'Brot, Landl, Domaleski & Brandt, in press):

*   A legacy system—i.e., a system that was in place during SY 2019-2020;

*   A new or revised system: A system that introduces new goals or changes the way existing goals are defined and prioritized through indicators, decision rules, or composite indices; or

*   A transitional system: An accountability system that deviates from the intended system design, in which SY 2020-2021 serves as a transitional year before the legacy or revised accountability system is implemented in SY 2021-2022.

Regardless of which option an SEA selects, all states should review their existing entry and exit criteria, deliberatively consider their options, and determine which option is best, given the available evidence.

IDENTIFICATION OF MISSING DATA

Table 2 presents possible scenarios depending on SY 2020-2021 decisions. The scenarios are based on whether states can identify and exit schools in SY 2020-2021 or are considering pursuing postponing their school determination until after SY 2020-2021.

TABLE 2 ENTRY AND EXIT OPTIONS FOR SY 2020-2021.	
IDENTIFYING AND EXITING SCHOOLS IN SY 2020-2021	**PURSUING POSTPONING IDENTIFICATION AND EXIT UNTIL AFTER SY 2020-2021**
• **Implementing a Legacy System:** A state maintains its legacy system and proceeds with "business as usual" in SY 2020-2021. The state will need to validate[1] that indicators and the overall system are sufficiently comparable within and across years. This might include the consistency and stability of trends, the ability to differentiate schools sufficiently, or ensuring that school determinations are defensible. States should ensure that all statutory requirements can be met.	• **Implementing a Legacy System:** A state cannot fully implement its original accountability system in SY 2020-2021 due to validity concerns (e.g., insufficient comparability across years, missing indicator data). Although the state may be able to report some results, it may have to pursue postponing entry and exit decisions for accountability purposes. The state should address any validity concerns for future determinations using data from spring 2020 and prior years. In this scenario, it is expected a state would resume identifying and exiting schools in SY 2021-2022, with no changes to the system. Any deviations from statutory requirements in SY 2020-2021 will likely require the submission of a waiver request.
• **Implementing a Transitional System:** A state is unable to implement one or more elements of its legacy system, due to missing or incomplete data or other factors, requiring the state to make minor modifications to SY 2020-2021 calculations or business rules. Such modifications should enable the state to maintain its intended interpretation and use of results (e.g., calculating indicator scores based on 2-year rather than 3-year averages; calculating growth in the absence of 2019-2020 data). Prior to implementation, the state should use (a) historical data to model the likely impact and (b) data from SY 2020-2021 to confirm that intended interpretations will hold and results will be appropriate to support entry and exit decisions. NOTE: in this scenario, methodologies for making school determinations would revert back to the original design in SY 2021-2022. Deviations for a single year will require states to consider processes for a one-year amendment. States should ensure that all statutory requirements can be met.	• **Implementing a Transitional or Revised System:** The state plans to revise its system and pursues postponing school determinations in SY 2020-21. Due to likely substantive changes to an accountability system, the state will need to consider the necessary processes to submit an amendment to its ESEA consolidated state plans. The state will need to validate that entry and exit decisions are defensible using a newly designed system. It would be valuable to corroborate interpretations using other related process or input data. Any deviations from statutory requirements in SY 2020-2021 will likely require the submission of a waiver request.
• **Implementing a Revised System:** The state chooses to significantly change its accountability system and make school determinations in SY 2020-2021. Concurrently, the state may need to make exit decisions using improvement goals defined within the legacy system. The next round of school determinations would occur with a new system, as proposed in the state's amendment. The state will need to validate that exit decisions are defensible (based on the consistency and stability of trends, the ability to differentiate schools sufficiently, or ensuring that improvement expectations are still relevant). Long-term changes will require states to consider processes for submitting an amendment. States should ensure that all statutory requirements can be met.	

IDENTIFYING AND EXITING SCHOOLS

What follows are typical approaches for identifying and exiting schools, after which this paper presents steps states can take to make identification and exit determinations in 2020-2021 and beyond.

TYPICAL APPROACHES FOR IDENTIFYING AND EXITING SCHOOLS

A review of relevant statutory requirements is helpful for understanding the options for making school determinations. As established at the outset of this paper, there are three categories of schools that state education agencies must identify for support: Comprehensive Support and Improvement (CSI), Targeted Support and Improvement (TSI), and Additional Targeted Support and Improvement (ATSI).

While states can identify additional categories of support, this discussion is limited to CSI, TSI, and ATSI. CSI designation typically is identified by the performance of all students in a school, whereas the TSI and ATSI designations are identified by student-subgroup performance. The SEA bases its CSI and ATSI decisions on the state's system for Annual Meaningful Differentiation (AMD). The AMD comprises the indicators specified in statute, which include the following indicators: (a) an achievement indicator, (b) another academic indicator, (c) an English Language Learner progress indicator, (d) an adjusted cohort graduation rate indicator, and (e) a school quality/student success indicator.

Table 3 provides a brief definition of these school designations and their respective exit criteria

TABLE 3 DEFINITIONS OF CSI, TSI, AND ATSI SCHOOLS (LYONS, D'BROT, LANDL, 2017).		
SCHOOL DESIGNATION	**IDENTIFICATION CRITERIA**	**EXIT CRITERIA**
Comprehensive Support and Improvement	Based on the state's AMD system, CSI requirements are: • Title I schools that meet the "not less than the lowest-performing 5 percent of all schools in the state" threshold requirement; • a high school that fails to graduate one-third or more of its students; • ATSI schools that have not satisfied exit criteria within a state-determined number of years and have cascaded into CSI status.	Exit criteria specify that schools no longer meet the CSI identification criteria; they also ensure that the school will continue making progress to improve academic and school success. States can specify additional exit criteria beyond those stated in statute.
Targeted Support and Improvement	TSI schools are those with consistently underperforming subgroups. States have the authority to define what "consistent underperformance" means for subgroups. TSI notification requirements are: • States notify the LEAs serving schools with one or more subgroups that are demonstrating consistent underperformance. • LEAs, in turn, notify these schools of their identification.	Exit criteria are not required but can be defined locally, and LEAs can determine whether more rigorous intervention is needed.
Additional Targeted Support and Improvement	Based on its system of AMD, states identify ATSI schools based on any student subgroup which, on its own, would lead to CSI identification.	Exit criteria mirror those of CSI schools for identified subgroups.

Despite ESEA's statutory language, states vary considerably in states vary considerably in the implementation of entry and exit criteria specified in their ESEA Consolidated State Plans. A recent review found that 11 states make these decisions annually, while the remaining 41 states make them less frequently. Other sources of variability among states include the timing of these decisions, the number of years of prior data are considered, the use of graduation rates, and performance thresholds for exit criteria (Meyers, Brandt, & Von Gronigan, 2020). This paper will now consider in more detail the varied approaches for identifying and exiting schools.

CSI APPROACHES TO IDENTIFICATION

CSI Identification Starting Year. The identification procedures among states vary from year to year, depending on both when the initial identification began and the frequency of identification (e.g., annual vs. every three years). Regarding the former, for example, most states began identifying CSI schools in fall 2018, but at least four states began identifying CSI schools in fall 2017 (one year prior to ESEA's reauthorization requirements).

CSI Identification Cycle. Once identified, a CSI school maintains its CSI status for one, two, or three years. Most states identify schools every three years, but a few do it more frequently (i.e., exiting and entering CSI status annually or every two years).

Number of Prior Years' Data Considered. States use one to three years of prior data when identifying CSI, ATSI, or TSI schools: Thirty states use one year of data; two states use two years; and 19 use three years. The calculation of specific indicators provides another example of variability among states regarding their reliance on prior data. For instance, one state uses three years of consecutive data to calculate proficiency and growth indicators but only one year to calculate its School Quality and Student Success indicator.

Using Graduation Rate to Identify CSI High Schools. States rely on different types of graduation rates to identify low-performing high schools. Thirty-seven states use the adjusted four-year cohort graduation rate for this purpose; one state uses a five-year rate; three states use a six-year rate, and at least 10 states use a weighted combination of four-, five-, six-, and seven-year cohort rates. Almost all states set the threshold at 67 percent, with only four states setting it higher. States will need to consider COVID-related data loss as they examine graduation cohorts and whether graduation-rate data for accountability are lagged.

IDENTIFYING AND EXITING SCHOOLS

ATSI APPROACHES TO IDENTIFICATION

ATSI Designations. Some states identify ATSI schools from the pool of non-CSI schools, and other states select ATSI from the pool of TSI schools. States vary in the number of years that ATSI schools must demonstrate improvement before moving on to CSI status: While 33 states require ATSI to improve within three years, 10 states allow four years, one state allows five years, and four states allow six years.

TSI Designations. States apply different criteria for identifying TSI schools, as compared to ATSI and CSI identifications. Examples include the use of different index thresholds, different cut-points, and different selection criteria. Index thresholds refer to specific point values associated with a criterion score (i.e., a composite index score), which are assigned to schools in a state's system. The Cut points designation refers to using a normative threshold to determine school identification (seven states use the lowest 10 percent; one state uses the lowest 25percent%; and two states use the lowest 1%percent).

Selection criteria refers to basing school identification on a subset of performance indicators, such as when performance or the combination of proficiency and other indicators falls below a specific threshold. (Note that selection criteria are used in rule-based or decision-based systems). Additionally, different states set thresholds for TSI differently to better align with their theories of action for supporting schools. For example, if a state is interested in narrowly focusing its subgroup supports, it may design its system to identify ATSI schools from a small pool of TSI schools using more stringent thresholds. In other cases, a state may establish thresholds and procedures that identify a large number of schools for TSI and ATSI, reflecting a different theory of action.

TSI APPROACHES TO IDENTIFICATION

TSI Identification Criteria. Statute requires that states identify TSI schools annually. However, states vary in terms of the number of years of prior data they use for making school determinations (although most use two to three years of data). As a reminder, states are required to notify LEAs if they serve a school identified for TSI.

EXIT CRITERIA AND IDENTIFICATION CYCLES

CSI and ATSI Exit Criteria. To reiterate, this paper does not discuss exit criteria for TSI schools, because LEAs are responsible for supporting their improvement plans and processes. The CSI exit criteria for 14 states, as well as the ATSI exit criteria for 15, focus on meeting or exceeding the criteria which led to initial identification. For example, a school that had fallen below the 5 percent threshold can exit when it both improves and exceeds the 5 percent threshold at the time of identification. The remaining 37 states include additional exiting criteria, which vary in complexity.

Examples include:

- demonstrating improvement for two or more years;

- demonstrating faithful implementation of the school-improvement plan;

- achieving a performance expectation exceeding the initial selection criteria (e.g., requiring the school to achieve a "C" grade or target index value for X number of consecutive years); and

- reducing achievement gaps (e.g., matching or exceeding a target of 3 percent reduction).

Because of pandemic-related data loss, states must carefully examine whether high-stakes entry and exit decisions can be supported in SY 2020-2021 or, rather, should states pursue delaying these decisions to SY 2021-2022.

CONSIDERATIONS FOR IDENTIFYING AND EXITING SCHOOLS

CONSIDERATIONS FOR IDENTIFYING AND EXITING SCHOOLS IN SY 2020-2021 AND BEYOND

States are encouraged to consider following these steps when evaluating options for identifying and exiting schools:

- Identify key issues based on whether the state can support school determinations in SY 2020-2021.
- Determine the evidence necessary to support the corresponding policy, technical, and impact claims.
- Determine whether the state needs to request an amendment or waiver, based on whether the state (a) must make substantive changes to the system, one-year changes to the system, or cannot meet statutory requirements.
- Establish a plan and document the rationale for implementing the plan in SYs 2020-2021 and 2021-2022.

Table 4 provides relevant considerations for SY 2020-2021, based on when states make their entry and exit decisions. The two decisions' timing, deliberated jointly, entail a logical grouping of issues for states to consider.

TABLE 4	CONSIDERATIONS BASED ON THE TIMING OF ENTRY AND EXIT DECISIONS.	
	ENTRY DECISIONS OCCUR ANNUALLY	**ENTRY DECISIONS OCCUR OTHER THAN ANNUALLY**
EXIT OCCURS ANNUALLY	If a state makes both entry and exit decisions annually, pandemic-related closures in SY 2019-2020 will significantly affect both school-improvement efforts and the data needed to make these decisions.	If data are missing or inconsistent, states should reconsider the advisability of slating entry decisions for SY 2020-2021. They also will need to revisit the annual exit decisions and validate the decisions in light of pandemic-related closures.
EXIT OCCURS OTHER THAN ANNUALLY	Pandemic-related school closures definitely will have an impact on entry decisions but may only affect exit decisions if planned for SY 2020-2021. If a state uses multi-year data for entry or exit decisions, it will need to determine whether these decisions are defensible in the absence of multi-year data. States also will need to determine if they will need to revise the system or determine how ESEA statutory requirements can be met.	If entry and exit decisions were planned for SY 2020-2021, states need to determine whether these decisions will be defensible in the absence of multi-year evidence and multi-year improvement efforts. If school determinations are indefensible, states may need to wait until sufficient data are available to interpret school improvement efforts and gather evidence of capacity-building and instructional change

CONSIDERATIONS FOR IDENTIFYING AND EXITING SCHOOLS

Based on the conditions listed in Table 4, states will need to carefully examine whether they can meet ESEA statutory requirements in SY 2020-2021. If determinations in SY 2020-2021 are indefensible, states may need to request waivers if they wish to pursue postponing exit and entry decisions until SY 2021-2022. Furthermore, states will need to determine whether or not substantive system changes are needed, which would require an amendment. Each cell in Table 4 requires states to consider three major issues:

- **Use of multiple years of data:** If using multiple years of data, states should assess the impact of missing data on multi-year averages in their calculations and performance interpretations. States will need to determine whether they can still substantiate data elements, indicators, and system claims. (This top is addressed in the next section.)

- **Breakdowns in school-improvement efforts:** Due to pandemic-related closures, schools, districts, and states could not implement school and instructional-improvement efforts for the entire SY 2019-2020. States will need to identify the best types of supplemental and contextual data they can use— while adhering to Family Educational Rights and Privacy Act requirements—to determine whether improvement efforts are effective, sustainable, and lasting during this time of school closures and beyond.

- **Justified interpretations for entry and exit decisions:** Entry and exit decisions specify minimum improvement expectations based on a relatively constrained set of accountability data. Since those data are not available, states will need to confirm whether there are sufficient data elements in the accountability system to make high-stakes determinations. If valid interpretations cannot be made in SY 2020-2021, states should consider leveraging additional data to contextualize how to carry improvement efforts into SY 2021-2022. That is, can they corroborate improvement efforts by using other available data?

By considering the three major issues associated with the cells described in Table 4, states can produce evidence-based decisions for using individual data elements and system indicators for high-stakes purposes. Each state also can assess whether school determinations, overall, are functioning as intended.

CONSIDERATIONS FOR IDENTIFYING AND EXITING SCHOOLS

Listed below are evaluation criteria for determining whether it is appropriate to make these determinations in SY 2020-2021 (Domaleski, Boyer, & Evans, in press; also see D'Brot, Landl, Domaleski, & Brandt, in press). Each criterion, which affects the degree to which data elements or indicators will impact entry and exit decisions, should be applied to the full system (because statute requires using the system of AMD for entry and exit decisions). States thereby can substantiate any claims associated with the individual indicators *and* the overall system.

These criteria are:

- **Completeness:** Are there missing data elements? Does the system capture the full breadth and depth of data as expected prior to COVID-19 disruptions? The criterion for completeness is rarely 100 percent, but it is more appropriate to evaluate completeness as the deviation from pre-pandemic standards. Checks for completeness should include multiple disaggregations (e.g., by school, student group, program).

- **Consistency:** Were data properties used for entry and exit criteria altered? Specifically, did COVID-19 disruptions change how data are defined, calculated, or collected? Such alterations will affect both the individual metrics. For instance, although graduation data were not waived, the availability of data on four-, five-, and six-year adjusted cohort graduation rates based on cohort assignment will be impacted; similarly, there will be an impact on the award of course grades results under a shortened school year and how they are aggregated (e.g., graduation rates, grade point averages).

- **Impact:** What is the impact of data changes on performance interpretations? These changes could be associated with individual data elements, indicators, or the overall system. Is it likely that data values (e.g., performance, distribution of data, ranges) will change substantially? Do values change based on other circumstances, even if the elements are complete and can be calculated based on the same procedures? The answers to these questions will inform data reporting.

- **Practicality:** Is it reasonable to collect and report the data used for entry and exit criteria? Will it cause undue burden on, or deflect from, higher priorities? For example, would new data collections and the associated be policies be too difficult to implement within a single year, or would they detract from attention on restarting instruction or reopening schools? If the data could be misunderstood, misinterpreted, or misused, states may need to withhold collecting or reporting on these data.

These criteria highlight the importance of considering individual data elements when making comparisons across indicators; such data elements also play a role in the system of annual meaningful differentiation (i.e., index-based systems or decision rules). School determinations depend on the system's capacity to support valid comparisons of data across schools and over time. In making these comparisons, decision makers apply the most stringent requirements using the four criteria above.

IMPLEMENTATION RECOMMENDATIONS FOR IDENTIFYING AND EXITING SCHOOLS

IMPLEMENTATION RECOMMENDATIONS FOR IDENTIFYING AND EXITING SCHOOLS

It is important for states to marshal evidence that their entry and exit decisions are justified. D'Brot et al. (in press) present claims for accountability systems present claims for accountability systems that help identify evidence to use data for high-stakes decisions. The relevant claims for initially identifying schools include:

- **Policy Claim:** The identified schools align with the system's theory of action. A school-determination theory of action may include that (a) identified schools have subgroups most in need of support, (b) identification captures schools as intended, or (c) identification supports subgroup-specific objectives.

- **Technical Claim:** Entry and exit decisions reflect meaningful differentiation within and across school classifications, and improvements in accountability data reflect sufficient progress to warrant removal of support.

- **Impact Claim:** The process of identifying schools causes districts and schools to deliberatively explore their indicator results and the corresponding implications for continuous-improvement efforts.

It will be difficult to substantiate policy, technical, and impact claims in the face of COVID-related disruptions such as shortened school calendars, reduced school-improvement interventions, and missing data which otherwise would have been used for validation purposes. Thus, it is important to extend these claims to use-cases, which pertain to describing a school's performance; evaluating trends on indicators; flagging schools for early indications of poor performance; and identifying schools for entry and exit. Specifically, states will need to determine whether COVID-related disruptions have adversely affected the evidence required (see D'Brot, et al, in press). States will need to answer two principal questions:

- Does the process for identifying CSI and ATSI schools target the schools most in need of support?

- Does the improvement in accountability data warrant removal of support?

By collecting sufficient evidence and ensuring the evidence supports claims for identification, states will be better equipped to determine whether they need to pursue either postponing decisions to SY 2021-2022 through a waiver or revising determination processes through an amendment.

Table 5 outlines the options available to states regarding their accountability systems, the evidence needed to support entry and exit determinations, the corresponding implications for these determinations, and suggested next steps. While the options shown are not exhaustive, they should be sufficient for states as they consider next steps for entering SY 2020-2021:

IMPLEMENTATION RECOMMENDATIONS FOR IDENTIFYING AND EXITING SCHOOLS

TABLE 5	SCHOOL DETERMINATION OPTIONS AND RECOMMENDED NEXT STEPS.		
	OPTIONS FOR SY 2020-2021 ENTRY DECISIONS OCCUR OTHER THAN ANNUALLY		
	IMPLEMENT LEGACY SYSTEM	**IMPLEMENT NEW OR REVISED SYSTEM**	**IMPLEMENT A TRANSITIONAL SYSTEM**
NEEDED EVIDENCE	When compared with the legacy system: • Indicator data support valid and reliable results. • Measures can be compared and differentiated appropriately. • Empirical results promote valid, fair, and reliable school ratings. • Entry and exit processes reflect meaningful differentiation and improvement.	When evaluated against revised state priorities or goals: • Indicator data support valid and reliable results. • Measures can be compared and differentiated appropriately. • Empirical results promote valid, fair, and reliable school ratings. • Entry and exit processes reflect meaningful differentiation and improvement; these processes are corroborated by historical trend data.	When evaluated against legacy system or revised state priorities: • Indicator data support valid and reliable results but do not reflect the full system's design. • Empirical results promote valid, fair, and reliable school ratings but fall short of the design goals. • Entry and exit processes will not be comparable to next year's school performance, because a transitional system is in place.
IMPLICATIONS FOR ENTRY AND EXIT	• If claims can be substantiated, identify schools for entry or exit. • Compile evidence for these claims that supports comparability, trend comparisons, and the defensibility of high-stakes decisions.	• If claims supporting revised state priorities can be substantiated, identify schools for entry or exit. • Identify historical data that can substantiate claims that the lowest-performing schools or subgroups.	• Explore the possibility of postponing school determinations to SY 2021-2022, unless a slightly modified system could support all necessary claims for entry and exit. • Collect and examine data to confirm entry and exit decisions in future years
NEXT STEPS	• Collect and organize documentation supporting the rationale to implement in SY 2020-2021. • Proceed cautiously and establish a communications plan about your decision to inform stakeholders.	• Submit request for an amendment reflecting system changes. • Collect and organize documentation supporting the rationale for SY 2020-2021 implementation.	• Either (a) make an amendment or waiver request to pursue the possibility of postponing school determinations for CSI, TSI, and ATSI schools in SY 2020-2021, or (b) collect and organize documentation supporting the rationale for SY 2020-2021 implementation. • If requesting a waiver or amendment, collect and organize documentation supporting the rationale for SY 2021-2022 implementation.

CONCLUSION

In light of the many changes, using status quo procedures and criteria may not be appropriate, at least for SY 2019-2020. States will need to substantiate that their revised or supplemental data and processes support valid determinations about which schools are low- or under-performing or no longer need federal support. Also, since 2020 summative assessment data are not available to make accountability calculations, states may need to make temporary modifications to their accountability systems that will affect their school determinations.

COVID-19 also affected the schools previously identified for support; due to early closures, these schools were unable to fully implement improvement plans, arguably resulting in lost progress that otherwise could have been made. If existing criteria for entry and exit are applied in SY 2020-2021, some CSI and ATSI schools may be prematurely exited—or not exited but reclassified— leading to the inappropriate or unnecessary delivery of resources.

States and districts developed and are implementing plans for reopening schools in SY 2020-2021. Regardless of how they have decided to reopen schools—in pen with contagion precautions, entirely online, or through a hybrid approach— reopening amid an ongoing pandemic will have major implications for all schools, but particularly for the lowest performing. Re-opening adaptations affect school attendance schedules, course schedules, remote learning practices, access to technology, high school course offerings, out-of-school programming, and extracurricular activities. The situation also is likely to significantly influence students' attendance, engagement, achievement, and exposure to high-quality curriculum, instruction, and assessment. In short, there will be widespread impact in ways that call into question the appropriateness of extant criteria for entry and exit.

This paper provides a number of considerations, criteria, and recommendations to help states determine how they should make school determinations in SY 2020-2021 or if waivers or amendments are warranted.

Below are three recommendations that can support states in evaluating their claims and collecting evidence related to the system's data elements, indicators, and criteria for entry and exit:

- **If planning to implement the state's legacy system**, collect sufficient evidence to substantiate high-stakes claims. Move forward with entry and exit decisions in SY 2020-2021 but proceed cautiously.

- **If planning to implement a revised system**, collect sufficient evidence to substantiate high-stakes claims aligned to new state goals or priorities. Move forward with entry and exit decisions in SY 2020-2021 but proceed cautiously with making any necessary changes to the system.

- **If planning to implement a transitional system** because there are too many challenges to implement a fully realized legacy or revised system, it will be difficult to justify either entry or exiting determinations. This difficulty arises from the stringency of claims associated with CSI and ATSI determinations such as meaningful differentiation; making high-stakes determinations; comparability; maintaining trends over time; and providing resources. If appropriate, consider requesting a waiver that will enable the state to pursue the possibility of postponing determinations, then collect data informing entry and exit decisions for SY 2021-2022.

CONCLUSION (Continued)

The following statement from CCSSO's Restart & Recovery: Considering the Outlook for School Accountability, State Guidance for Making Annual Accountability Determinations in School Year 2020-2021 and Beyond addresses the tension between a state's ability to calculate results and the potential misuse or misinterpretation of these results.

> [E]ven if a state has a high level of confidence in the data and has not modified its system, it will be difficult for SEA leaders to substantiate claims that school-improvement efforts were sufficiently implemented to have taken root during SY 2019-2020 and during the start of SY 2020-2021. Therefore, while the availability of and confidence in the data are necessary there are insufficient conditions to attribute changes in performance to specific school-improvement initiatives. Stated another way, disentangling 'pandemic effects' from other influences on school performance will be challenging, making it difficult to support high-stakes decisions like entry/exit from ESEA school designations. (p. 18)

The choice to identify schools for entry or exit into CSI and ATSI designations will be based on state priorities, design goals, data constraints, and the efficacy of school-improvement efforts in the face of pandemic-related closures. Whatever route the states choose, it will be important to collect information, substantiate claims, and document evidence supporting the rationale behind school-improvement goals related to identifying and exiting schools.

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