



January 2021

# K-12 EDUCATION

## Observations on States' School Improvement Efforts



A Century of Non-Partisan Fact-Based Work

# GAO@100 Highlights

Highlights of [GAO-21-199](#), a report to congressional committees

## Why GAO Did This Study

The Elementary and Secondary Education Act (ESEA) requires states to have statewide accountability systems to help provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. These systems must meet certain federal requirements, but states have some discretion in how they design them. For example, ESEA requires states to identify low-performing schools and student subgroups for support and improvement.

Senate Report 115-289 accompanying the Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Bill, 2019, includes a provision for GAO to review states' school improvement activities.

This report addresses (1) how states identify and allocate funds for schools identified for support and improvement; and (2) the extent to which states have capacity to support districts' school improvement activities and how helpful states find Education's technical assistance.

GAO analyzed the most current approved state plans from all 50 states and the District of Columbia as of September 2020. GAO also surveyed and received responses from all 50 states and the District of Columbia. GAO also conducted follow-up interviews with officials in three states selected based on variation in reported capacity and geographic diversity.

View [GAO-21-199](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov).

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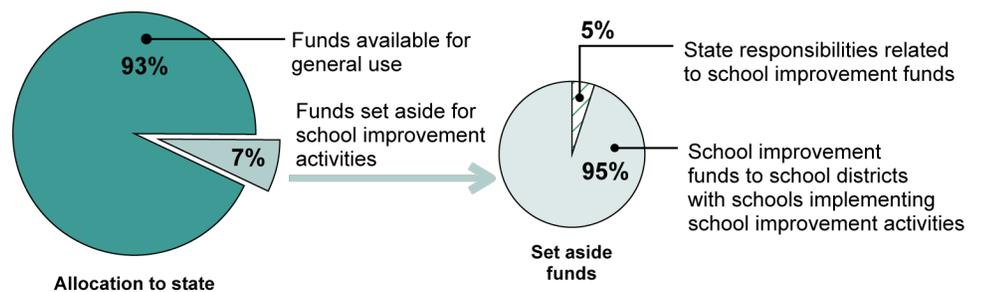
## K-12 EDUCATION

### Observations on States' School Improvement Efforts

## What GAO Found

Many states use flexibilities in the Elementary and Secondary Education Act (ESEA), as amended, in identifying low-performing schools and student subgroups (e.g., students from major racial and ethnic groups and low-income students) that need support and improvement. For example, states must identify all public high schools failing to graduate at least one-third of their students. According to GAO's state plan analysis, four states used ESEA's flexibilities to set higher graduation rates (i.e., 70-86 percent) for purposes of state accountability. Similarly, while ESEA requires states to identify schools in which students in certain subgroups are consistently underperforming, 12 states assess the performance of additional student subgroups. Although states are generally required to set aside a portion of their federal education funding for school improvement activities (see figure), states have some discretion in how they allocate these funds to school districts. According to GAO's survey, 27 states use a formula to allocate funds. GAO also found that in at least 34 states, all school districts that applied for federal funds received them in school year 2018-2019, but states had discretion regarding which schools within those districts to fund and at what level.

#### Funding for School Improvement through the Elementary and Secondary Education Act (ESEA) Title I, Part A



Source: 20 U.S.C. § 6303(a) and (b). | GAO-21-199

Note: For more details, see figure 2 in GAO-21-199.

A majority of the 50 states and the District of Columbia responding to our survey reported having at least moderate capacity to support school districts' school improvement activities. Education provides various types of technical assistance to build local and state capacity such as webinars, in-person training, guidance, and peer networks. About one-half of states responding to GAO's survey sought at least one type of technical assistance from Education's program office and various initiatives, and almost all of those found it helpful. For example, Education's Regional Educational Laboratories (REL) help states use data and evidence, access high-quality research to inform decisions, identify opportunities to conduct original research, and track progress over time using high-quality data and methods. Several states most commonly reported finding the following assistance by RELs to be helpful: in-person training (26), webinars (28), and reviews of existing research studies to help select interventions (24).

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# Contents

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Letter		1
	Background	4
	Many States Use ESEA’s Flexibilities in Identifying and Funding Schools Needing Support and Improvement; One-half of States Distribute Funds via Formula	6
	Most States Reported at Least Moderate Capacity to Support School Districts’ Improvement Efforts and Generally Found Education’s Technical Assistance Helpful	11
	Agency Comments	22
Appendix I	Survey to State Educational Agencies on School Improvement Activities	24
Appendix II	GAO Contact and Staff Acknowledgments	40
Tables		
	Table 1: States’ Average School Improvement Grant Amounts for Public K-12 Schools in School Years 2018-2019 and 2019-2020	11
	Table 2: Actions States Reported Taking to Build Capacity to Support School Districts with Schools Identified for Support and Improvement	12
	Table 3: Actions States Reported Taking to Help School Districts Develop School-Level Needs Assessments	14
	Table 4: Actions States Reported Taking to Help School Districts Select Evidence-based Interventions	16
	Table 5: Actions States Reported Taking to Help School Districts Identify Resource Inequities	17
	Table 6: Most Frequent Resources 14 States Reported Including in Their Most Recently Completed Resource Allocation Reviews	18
Figures		
	Figure 1: Four Key Components of Accountability Systems under the Elementary and Secondary Education Act (ESEA)	4
	Figure 2: Funding for School Improvement through the Elementary and Secondary Education Act (ESEA) Title I, Part A	5

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Figure 3: Types of Technical Assistance Provided by Regional Educational Laboratories and Degree of Helpfulness Reported by States	19
Figure 4: Types of Technical Assistance Provided by Comprehensive Centers Program and Degree of Helpfulness Reported by States	20
Figure 5: Types of Technical Assistance Provided by State Support Network and Degree of Helpfulness Reported by States	20
Figure 6: Types of Technical Assistance Provided by the Department of Education’s Program Office and Degree of Helpfulness Reported by States	21
Figure 7: Types of Nonfederal Entities Providing Assistance with School Improvement Activities and Degree of Helpfulness Reported by States	22

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**Abbreviations**

ATSI	additional targeted support and improvement
COVID-19	Coronavirus Disease 2019
CSI	comprehensive support and improvement
Education	U.S. Department of Education
ESEA	Elementary and Secondary Education Act of 1965
ESSA	Every Student Succeeds Act of 2015
LEA	local educational agency
REL	Regional Educational Laboratories
SEA	state educational agency
TSI	targeted support and improvement

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January 11, 2021

Chair  
Ranking Member  
Subcommittee on Labor, Health and Human Services, Education, and  
Related Agencies  
Committee on Appropriations  
United States Senate

Chair  
Ranking Member  
Subcommittee on Labor, Health and Human Services, Education, and  
Related Agencies  
Committee on Appropriations  
House of Representatives

Under the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized and amended by the Every Student Succeeds Act (ESSA) in 2015, all states must have a statewide accountability system to help provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.<sup>1</sup> All statewide accountability systems must meet certain federal requirements, but states have some discretion in how they design those systems. When ESEA was amended in 2015, numerous changes were made to how states are to identify low-performing schools and student subgroups (e.g., students from major racial and ethnic groups and low-income students); use evidence to select intervention strategies to improve schools; and review how resources are allocated to school districts with low-performing schools.

Senate Report 115-289 accompanying the Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Bill, 2019, includes a provision for GAO to review school improvement activities. This report addresses (1) how states identify and allocate funds to schools identified for support and improvement; and (2) the extent to which states have capacity to support districts' school

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<sup>1</sup> The Elementary and Secondary Education Act (ESEA) was comprehensively reauthorized by the Every Student Succeeds Act (ESSA) on December 10, 2015. Pub. L. No. 89-10, 79 Stat. 27 (1965), as amended by Pub. L. No. 114-95, 129 Stat. 1802 (2015). Throughout this report, we refer to ESEA, as amended by ESSA, as ESEA.

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improvement activities and how helpful they find the U.S. Department of Education's (Education) technical assistance.

To describe how states identify and allocate funds to schools identified for support and improvement, we reviewed applicable requirements in ESEA and analyzed accountability plans for all 50 states and the District of Columbia.<sup>2</sup> We downloaded these plans from Education's website on December 12, 2019. Fourteen states amended their plans after that date, and we downloaded the updated plans in September 2020. Because states can submit requests to amend their plans at any time, information in this report gathered from state plans is as of September 2020.

To describe the extent to which states have capacity to support districts' school improvement activities and how helpful they find Education's technical assistance, we selected eight plans for an additional, in-depth analysis to learn how selected states intend to conduct resource allocation reviews and establish a system of technical assistance and support for districts and identified schools. For this analysis, we selected geographically diverse states that varied in terms of the percentages of schools identified for support and improvement.

To address both objectives, in December 2019, we sent a web-based survey with questions to address both research objectives to state-level school improvement officials in all 51 states.<sup>3</sup> We received responses from all of them.<sup>4</sup> Our survey included questions about states' most recent school improvement activities. Specifically, we asked questions related to: (1) when and how many schools were identified for support and improvement; (2) the school improvement funds award process, grant amounts, and the timing and content of resource allocation reviews; (3) states' capacity and efforts to support districts and challenges faced; and (4) states' perception of Education's assistance to states.<sup>5</sup> To develop the survey, we performed a number of steps to ensure the accuracy and completeness of the information collected, including

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<sup>2</sup> ESEA requires states to submit a state plan to the Secretary of Education to receive Title I funds. These plans describe states' accountability systems, including how they measure how schools are performing for all students and student subgroups. Throughout this report, we refer to these required submissions as state plans.

<sup>3</sup> Throughout this report, we refer to the District of Columbia as a state.

<sup>4</sup> Not all states responded to every question or the sub-parts of every question.

<sup>5</sup> See appendix I for select survey questions.

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external reviews by officials at Education and the Council of Chief State School Officers, and an internal peer review by an independent GAO survey expert. We also pre-tested the survey instrument to check the clarity of the question and answer options, as well as the flow and layout of the survey. We conducted the pre-tests over the phone with state-level school improvement officials in three states selected based on the extent to which they had identified schools for support and improvement.<sup>6</sup>

We conducted additional follow-up with a small number of survey respondents to clarify responses and we collected additional demographic data for the 2017-2018, 2018-2019, and 2019-2020 school years. Additionally, in June 2020, we conducted follow-up interviews with officials from Florida, Indiana, and Oregon to obtain more detailed information and illustrative examples, such as lessons learned related to the school identification process. We selected these states based on variation in their responses to survey questions about states' capacity to assist school districts with school improvement planning activities and the challenges states encounter doing so. We also selected states for their geographic diversity.

We also reviewed relevant Education guidance and relevant literature. Lastly, we interviewed Education officials as well as representatives from the Center on Education Policy, the Council of Chief State School Officers, and the Education Commission of the States—organizations that have studied ESEA and school improvement.

The information we collected relates to the processes states had in place before the Coronavirus Disease 2019 (COVID-19) pandemic and represents a baseline from which to compare school improvement activities going forward.

We conducted this performance audit from April 2019 to January 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

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<sup>6</sup> We used a Center on Education Policy report to obtain data on the number of schools identified in each school improvement category as of July 2019. See, Center on Education Policy, The George Washington University Graduate School of Education and Human Development, *Number of Low-Performing Schools by State in Three Categories (CSI, TSI, and ATSI), School Year 2018-19, Updated July 2019* (Washington, D.C.: The George Washington University, 2019).

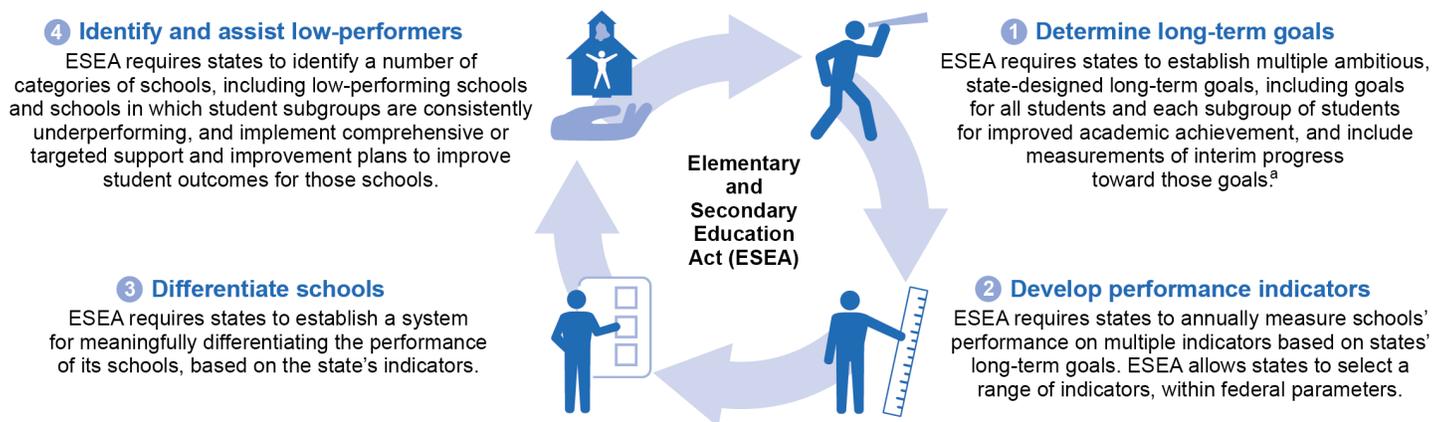
the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Background

### ESEA Accountability and School Identification Requirements

As part of their accountability systems, states must: (1) determine long-term goals, (2) develop performance indicators, (3) differentiate schools, and (4) identify and assist low-performers (See fig.1.)

**Figure 1: Four Key Components of Accountability Systems under the Elementary and Secondary Education Act (ESEA)**



Source: GAO analysis of Elementary and Secondary Education Act (ESEA) accountability system requirements. | GAO-21-199

Note: This figure provides a high-level summary of selected components of state accountability systems as required by ESEA. For additional information on these components, see 20 U.S.C. § 6311(c) and (d).

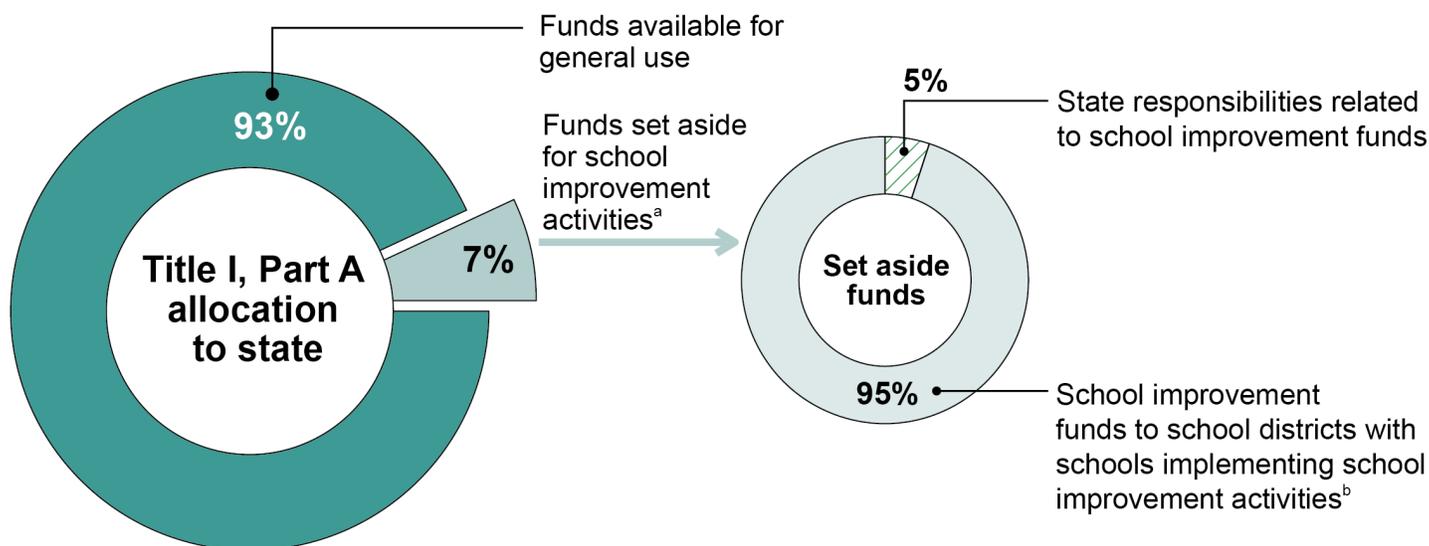
<sup>a</sup>Student subgroups include economically disadvantaged students, students from major racial and ethnic groups, children with disabilities, and English learners.

In identifying low-performing schools and student subgroups, states are to assess school performance overall as well as the performance of the following student subgroups: (1) economically disadvantaged students, (2) students from major racial and ethnic groups, (3) children with disabilities, and (4) English learners. States must then assist districts that are implementing plans to improve student outcomes for these schools and student subgroups. Generally, states must set aside 7 percent of

their Title I, Part A dollars for such school improvement activities.<sup>7</sup> (See fig. 2.)

States are required to allocate at least 95 percent of their school improvement funds to school districts to serve schools implementing comprehensive or targeted support and improvement activities.<sup>8</sup> States must ensure that districts receiving school improvement funds represent the geographic diversity of the state, and grants are of sufficient size to enable a district to effectively implement selected strategies.<sup>9</sup>

**Figure 2: Funding for School Improvement through the Elementary and Secondary Education Act (ESEA) Title I, Part A**



Source: 20 U.S.C. § 6303(a) and (b). | GAO-21-199

Note: Title I, Part A of ESEA authorizes financial assistance to school districts and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.

<sup>a</sup>States are generally required to set aside 7 percent except under certain exceptions, such as when the special rule found at 20 U.S.C. § 6303(h) applies.

<sup>b</sup>States, with districts' permission, may choose to use school improvement funds to directly provide services to school districts or arrange for other entities to provide the services.

<sup>7</sup> Title I, Part A of ESEA authorizes financial assistance to school districts and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.

<sup>8</sup> 20 U.S.C. § 6303(b)(1)(A).

<sup>9</sup> 20 U.S.C. § 6303(b)(2)(A).

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## Many States Use ESEA's Flexibilities in Identifying and Funding Schools Needing Support and Improvement; One-half of States Distribute Funds via Formula

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### Many States Use ESEA's Flexibilities in Identifying Schools for Support and Improvement

According to our review of 51 state plans, many states use a similar process to identify schools for support and improvement. States must identify three categories of schools in need of improvement: comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI).

### Comprehensive Support and Improvement Identification

#### Comprehensive support and improvement (CSI) schools

Schools that are (1) not fewer than the lowest-performing 5 percent of all Title I schools in the state; (2) all public high schools failing to graduate one third or more of their students; and (3) Title I additional targeted support and improvement schools (i.e., schools with one or more student subgroups performing at or below the same level as the lowest-performing Title I schools in the state identified for CSI) that have not improved within a certain number of years as determined by the state.

Source: 20 U.S.C. § 6311(c)(4)(D)(i) | GAO-21-199

States have discretion to identify schools for purposes of state accountability in addition to those required by ESEA for CSI, but a school district may not receive school improvement funds for these additional schools. (See sidebar.) According to our analysis of all 51 state plans, a number of states have identified additional schools for CSI beyond those that meet the statutory requirements for CSI identification.<sup>10</sup> For example,

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<sup>10</sup> In addition to identifying CSI schools, Georgia, Missouri, and Utah identified an additional statewide category of schools for support and improvement in their state. States may establish additional statewide categories of schools pursuant to 20 U.S.C. § 6311(c)(4)(D)(ii).

- Fourteen states include both Title I and non-Title I schools to identify the lowest-performing schools.<sup>11</sup> For example, Massachusetts intends to identify the lowest 5 percent of schools, while New York will identify any non-Title I school that performs at the level of identified Title I schools.
- Four states will use high school graduation rates above 66.6 percent for CSI identification.<sup>12</sup> These rates ranged from 70 percent to 86 percent. Maine for example, will use an 86 percent graduation rate because none of its student subgroups has a graduation rate lower than 76 percent.

States must identify CSI schools at least once every 3 school years, but they have the flexibility to do so more frequently. However, most states plan to do so every 3 years; according to their state plans, 40 of 51 states plan to identify CSI schools every 3 years and 11 states plan to identify them annually. Education directed states to start identifying schools no later than the 2018-2019 school year.<sup>13</sup>

## Targeted Support and Improvement Identification

### Targeted support and improvement (TSI) schools

Public schools in which any student subgroup—economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners—is consistently underperforming.

Source: 20 U.S.C. § 6311(c)(4)(C)(iii). | GAO-21-199

Although a school may not be designated as a CSI school, if a student subgroup within a school is consistently underperforming, as determined by the state, the school will be identified as a TSI school. (See sidebar.) Our analysis of state plans found that states use the flexibility in ESEA to define “consistently underperforming” in various ways. These definitions generally fall into three categories: (1) performance at the level of the lowest-performing 5 percent of Title I schools in the state, (2) performance at or below the lowest-performing 5 or 10 percent of all schools or subgroups in the state, or (3) performance not meeting interim progress goals.

In addition, 12 states assess the performance of additional student subgroups when identifying TSI schools. For example, some states combine students from multiple small racial and ethnic student subgroups

<sup>11</sup> We use the term Title I schools to refer to schools that receive Title I funding. Non-Title I schools do not receive Title I funds.

<sup>12</sup> The four states are Connecticut, Kentucky, Maine, and South Carolina. States are required to identify all public high schools in the state failing to graduate one third or more of their students for CSI.

<sup>13</sup> States were initially required to start identifying CSI schools by the 2017-2018 school year. However, the Secretary of Education used her transition authority under ESSA to give states an additional year to begin identifying schools.

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into one larger subgroup to avoid revealing students' personally identifiable information.<sup>14</sup>

ESEA requires states to identify TSI schools annually; however, states have flexibility to determine when they will begin identifying TSI schools. Our analysis shows that almost two-thirds of states (31 of 51) first identified TSI schools in school year 2018-2019 and 10 planned to identify schools in 2019-2020.<sup>15</sup>

## Additional Targeted Support and Improvement Identification

### Additional targeted support and improvement (ATSI) schools

Public schools in which one or more student subgroups are performing at or below the same level as the lowest-performing schools in the state identified for comprehensive support and improvement.

Source: 20 U.S.C. § 6311(d)(2)(C). | GAO-21-199

Similar to TSI identification, ATSI identification is based on student subgroup performance, and states may identify schools based on the performance of additional subgroups the state includes in its accountability system. (See sidebar.) Unlike in TSI, states do not have the same degree of flexibility to determine the performance level prompting ATSI identification. States must identify ATSI schools using the same performance level used for low-performing CSI identification.<sup>16</sup>

States have some discretion to determine which set of schools are used for ATSI identification. According to Education guidance, states may identify ATSI schools either from all public schools in the state or from schools identified for TSI. According to state plans, the majority of states (36 of 51) identify ATSI schools from all of the state's public schools while 15 states identify ATSI schools from identified TSI schools. Generally, a state that identifies ATSI schools from among TSI schools might ultimately identify fewer ATSI schools than a state that identifies ATSI schools from among all schools.

States also have discretion to determine how often ATSI schools are identified, and according to state plans, over one-half of states (28 of 51) will identify ATSI schools every 3 years while 21 states will identify

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<sup>14</sup> To be included in the identification process, a student subgroup must contain enough students to allow for disaggregating data without revealing students' personally identifiable information.

<sup>15</sup> Identifications scheduled for 2019-2020 may not have taken place due to school closures caused by COVID-19. Of the remaining ten states, four identified TSI schools in 2017-2018 and one intends to do so in 2020-2021. Five state plans did not specify when the states would first identify TSI schools.

<sup>16</sup> Because of the discretion states have in TSI identification, it is possible for the performance level leading to TSI and ATSI identification to be the same. In addition, duplication in the number of schools identified for TSI and ATSI is likely because schools can be identified as both TSI and ATSI.

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schools annually.<sup>17</sup> States were required to start identifying schools no later than the 2018-2019 school year.<sup>18</sup>

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### Over One-Half of States Reported Allocating School Improvement Funds by Formula, and Almost All School Districts That Applied for Funds Received Them

States support efforts to improve student outcomes by allocating school improvement funds to districts with identified schools.<sup>19</sup> When allocating funds, states must give priority to: (1) districts serving high numbers or high percentages of schools implementing CSI and TSI plans; (2) districts demonstrating the greatest need for such funds, as determined by the state; and (3) districts demonstrating the strongest commitment to using the funds to enable the lowest-performing schools to improve student achievement and student outcomes.<sup>20</sup>

ESEA affords states flexibility to allocate school improvement funds to school districts using either a formula, competitive, or hybrid process. School districts must apply for the funds.<sup>21</sup> According to our survey, states most commonly distribute these funds by formula.

- More than one-half of states (27 of 51), reported using a formula to allocate school improvement funds to school districts. Formulas can help ensure all eligible school districts receive some funding.
- Seven states reported using a competitive process. A competitive process may be better suited for spurring reforms and innovative approaches, as only districts meeting required criteria are eligible to receive grants.
- Sixteen states use a hybrid process, which combines a formula approach with a competitive approach.<sup>22</sup> For example, Indiana state officials told us they use a formula to provide school improvement grants to districts for the first year of school improvement activities, and districts must compete for a second year of funding.

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<sup>17</sup> Of the two remaining states, one state will identify schools every 2 years, and the other will identify schools every 4 years.

<sup>18</sup> See Department of Education *Dear Colleague Letter* (Apr. 10, 2017).

<sup>19</sup> Identified schools meeting ESEA's statutory requirements can receive school improvement funds. Additional schools identified for state accountability purposes cannot receive school improvement funds.

<sup>20</sup> 20 U.S.C. § 6303(f).

<sup>21</sup> 20 U.S.C. § 6303(e).

<sup>22</sup> One state did not identify which of the three processes it uses.

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When allocating school improvement funds to school districts, each state determines the award amount, and length of the award.<sup>23</sup> In our survey, more than one-half of states (28 of 51) reported awarding school improvement funds annually, and 12 states awarded funds for 2 to 3 years.<sup>24</sup> Nine states reported using multiple time periods.<sup>25</sup> For example, one state gives 2-year awards for CSI schools and 1-year awards for TSI and ATSI schools. In the other states, the award period varies based on where schools are in the improvement process. For example, a state reported offering 6-month awards for initial planning, 10-month awards for teacher mentoring, and 18-month awards for implementation.

For school year 2018-2019, 34 states reported that all school districts applying for funds received funding.<sup>26</sup> For school year 2019-2020, 29 states reported that all school districts applying for funds received funding.<sup>27</sup>

While almost all school districts receive school improvement funds, not all identified schools within a district received funds or received the same amount of funds. For example, state officials from Florida and Indiana told us they provide school improvement funds for CSI schools but do not provide funds for TSI schools. One state official commented in our survey that, the state's school improvement funds have been fully used each year, with some schools remaining unfunded. Washington notes in its state plan that, after it funds CSI schools there will likely not be enough money to fund all TSI schools; while New York notes in its plan that CSI schools will receive more funds than TSI schools. Oregon officials told us

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<sup>23</sup> Awards must be of sufficient size to enable the district receiving the funds to effectively implement all proposed interventions. 20 U.S.C. 6303(b)(2)(A)(ii) Funds may be awarded for a period of not more than 4 years, which may include a planning year. 20 U.S.C. 6303(c).

<sup>24</sup> The 28 states include seven states awarding funds for less than 2 years.

<sup>25</sup> One state reported awarding grants for up to 4 years. One state did not report on a time period.

<sup>26</sup> Eight states reported that not all districts that applied received funding. Nine states, including Hawaii which has only one school district, did not provide information on the number of districts applying for funding.

<sup>27</sup> Eight states reported that not all districts that applied received funding. Fourteen states, including Hawaii which has only one school district, did not provide information on the number of districts applying for funding.

they fund both CSI and TSI schools, but fund CSI schools at a higher rate.

Table 1 shows the average amount of school improvement funds allocated to schools in school years 2018-2019 and 2019-2020 based on states' responses to our survey.

**Table 1: States' Average School Improvement Grant Amounts for Public K-12 Schools in School Years 2018-2019 and 2019-2020**

(in dollars)

State student population	Average minimum award 2018-2019	Average maximum award 2018-2019	Average minimum award 2019-2020	Average maximum award 2019-2020
1million+	48,000	505,000	31,000	444,000
500,001 to 999,999	76,000	349,000	80,000	405,000
150,000 to 500,000	37,000	337,000	37,000	287,000
Less than 150,000	59,000	123,000	122,000	417,000

Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Numbers have been rounded to the nearest thousand. Officials from 43 states and the District of Columbia reported 2018-2019 school improvement fund data in our survey. Officials from 36 states and the District of Columbia reported 2019-2020 school improvement fund data in our survey.

## Most States Reported at Least Moderate Capacity to Support School Districts' Improvement Efforts and Generally Found Education's Technical Assistance Helpful

### While Most States Reported at Least Moderate Capacity, Many Cited Challenges Supporting Key Aspects of School Improvement

In response to our survey, most states reported having at least moderate capacity to support districts' planning efforts for school improvement activities such as conducting school-level needs assessments, selecting evidence-based interventions, and identifying resource inequities. Capacity involves maintaining both appropriate resources and the ability to effectively manage those resources. We previously reported that the

capacity of grantees is a key issue in grants management that can affect program success.<sup>28</sup>

States also reported taking actions to build their capacity to further support districts with identified schools. (See table 2.)

**Table 2: Actions States Reported Taking to Build Capacity to Support School Districts with Schools Identified for Support and Improvement**

State actions to build capacity of identified schools	Number of states taking action
Developed a mechanism to communicate with stakeholders	47
Established school improvement point of contact or office within the state educational agency (SEA)	46
Provided training/professional development for SEA staff	42
Recruited or retained critical SEA staff	41
Participated in peer to peer sharing with other SEAs using working groups, listserv or other interface	40
Created a support infrastructure that spans SEA divisions	38
Established an SEA point of contact for Regional Educational Laboratories or Comprehensive Centers	38
Facilitated peer to peer sharing among districts using working groups, listserv or other interface	37
Reorganized existing SEA program offices across the SEA	36
Updated technical infrastructure (e.g. to facilitate data transfer between districts and SEA)	35
Hired additional staff	32
Contracted with vendor to provide technological expertise or specialty skills needed by the SEA	30

Source: GAO analysis of survey of state officials. | GAO-21-199

To improve student outcomes, identified schools, as well as the school districts in which they are located, are to develop and implement a comprehensive support and improvement plan.<sup>29</sup> The CSI plans must, among other things, be based on a school-level needs assessment, include evidence-based interventions, and identify resource inequities.<sup>30</sup> (See sidebar for information about school-level needs assessments.)

<sup>28</sup> GAO, *Race to the Top: Education Could Better Support Grantees and Help Them Address Capacity Challenges*, [GAO-15-295](#) (Washington, D.C.: April 13, 2015).

<sup>29</sup> School districts are responsible for developing comprehensive support and improvement plans. 20 U.S.C. § 6311(d)(1)(B). Schools are responsible for developing targeted support and improvement plans. 20 U.S.C. § 6311(d)(2)(B).

<sup>30</sup> 20 U.S.C. § 6311(d)(1)(B). Targeted support and improvement plans must include evidence-based interventions. 20 U.S.C. § 6311(d)(2)(B)(ii). Plans of schools targeted for additional support and improvement plans must also identify resource inequities. 20 U.S.C. § 6311(d)(2)(C).

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## School-Level Needs Assessments

### School-Level Needs Assessments

The Elementary and Secondary Education Act requires districts to conduct school-level needs assessments for comprehensive support and improvement schools.

The general purpose of the needs assessment is to help districts and schools examine gaps between the current and desired state of the school. Specifically, the purpose is to identify and understand specific factors that may be causing those needs to exist, prioritize those needs that are most important, and select appropriate strategies that may address improvement needs and achieve desired results.

Source: 20 U.S.C. § 6311(d)(1)(B)(iii). Cary Cuiccio and Marie Husby-Slater, Needs Assessment Guidebook: Supporting the Development of District and School Needs Assessments (Washington, D.C.: State Support Network, May 2018). | GAO-21-199

States must provide technical assistance to districts serving a “significant number” of schools implementing CSI or TSI plans and periodically conduct resource allocation reviews of school districts with a “significant number” of schools identified for CSI and schools implementing TSI plans.<sup>31</sup>

Almost all states reported having at least moderate capacity to help districts conduct school-level needs assessments. Specifically, one-half of states (26 of 51) reported that they had full or almost full capacity to support districts’ efforts to develop school-level needs assessments, 22 reported moderate capacity, and three reported minimal capacity.

Still, over two-thirds of states (39 of 51) found the process at least somewhat challenging.<sup>32</sup> For example, Oregon officials told us that helping school districts develop needs assessments for high schools failing to graduate one-third or more of their students is challenging because these schools previously may have directed more students to alternative schools—which often serve at-risk students who are struggling academically or behaviorally. We previously reported that academic outcomes for students were substantially lower in alternative schools than in nonalternative schools for the 2015-2016 school year.<sup>33</sup>

States reported taking several actions to help districts conduct school-level needs assessments. (See table 3.) For example, one state commented in our survey that it assigned a capacity building coach to each CSI school to guide that school’s leadership team through the needs assessment process. Florida officials told us they provide districts access to state-level databases to help districts and schools use data to target improvement activities to those students most in need. Oregon officials told us they take a regional approach to providing supports. For example, they said they held a regional workshop with many district and schools officials that provided a high-level overview on needs assessments and aligning these assessments to the school improvement plan.

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<sup>31</sup> States determine what a significant number of identified schools is. 20 U.S.C. § 6311(d)(3)(A)(ii-iii).

<sup>32</sup> In contrast, 12 states reported having no challenges.

<sup>33</sup> GAO, *K-12 Education: Information on How States Assess Alternative School Performance* GAO-20-310, (Washington, D.C.: Mar 27, 2020).

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**Table 3: Actions States Reported Taking to Help School Districts Develop School-Level Needs Assessments**

<b>Developing school-level needs assessments</b>	<b>Number of states taking action</b>
Worked one-on-one with district (e.g., regular phone or in-person meetings with district staff)	50
Provided training/professional development for districts or school-level staff either online or in person	49
Provided written guidance, policies, and/or procedures	46
Provided models or templates for districts' use	46
Provided support to districts on communicating efforts (e.g., bullet points, fact sheets)	44
Facilitated peer to peer sharing among districts using working groups, listserv, or other interface	32
Provided assistance finding and selecting contractors	26
Updated technical infrastructure (e.g., to facilitate data transfer between districts and state)	25
Provided support to districts on using resources from Regional Educational Laboratories or Comprehensive Centers	22

Source: GAO analysis of survey of state officials. | GAO-21-199

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## Evidence-Based Interventions

### Selecting Evidence-Based Interventions

The Elementary and Secondary Education Act requires that one or more evidence-based interventions be implemented in comprehensive and targeted support improvement plans. School improvement funds can only be used on evidence-based interventions that demonstrate a statistically significant effect on improving student outcomes or other relevant outcomes based on strong evidence from at least one well-designed and well-implemented experimental study, moderate evidence from at least one well-designed and well-implemented quasi-experimental study, or promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias.

Interventions supported by higher levels of evidence, specifically strong evidence or moderate evidence, are more likely to improve student outcomes because they have been proven to be effective. When strong evidence or moderate evidence is not available, promising evidence may suggest that an intervention is worth exploring. Interventions with little to no evidence should at least demonstrate a rationale for how they will achieve their intended goals and be examined to understand how they are working.

Source: 20 U.S.C. § 7801(21). U.S. Department of Education, Non-regulatory Guidance: Using Evidence to Strengthen Education Investments, (Washington, D.C. September 16, 2016), | GAO-21-199

In response to our survey, most states (41 of 51) reported having at least moderate capacity to help districts select evidence-based interventions (See sidebar.) The remaining 10 states reported minimal to no capacity to help districts select evidence-based interventions.

However, most states (44 of 51) also reported that helping districts select evidence-based interventions was somewhat or very challenging. This included helping districts access and keep track of the steadily growing body of current education research, discern the quality and objectivity of available evidence, and categorize evidence according to ESEA's requirements. For example, Florida officials told us that districts can have trouble selecting interventions that meet ESEA evidence-based requirements because there are limited interventions available. They also told us resources on evidence-based interventions are still being built and districts tend to select interventions based on promising evidence-based strategies rather than strong or moderate evidence. Further, Indiana officials told us that, after examining what interventions districts selected, districts have to shift their thinking to select interventions based on a higher threshold of evidence that includes rigorous research methods such as studies using randomized control groups to evaluate student outcomes. For example, officials found that the evidence for some interventions only supported their use at certain grade levels. Because an intervention might not be applicable to all grades, Indiana officials asked districts to ensure that they are scaling interventions properly.

States reported taking a variety of actions to help districts select evidence-based interventions. (See table 4.) For example, Indiana officials told us that they are developing a data-sharing platform of evidence-based interventions currently being implemented in the state to help districts with similar demographics share strategies that may be working for different student subgroups. In addition, they have senior-level data specialists who help districts identify evidence-based interventions and vet vendors. In addition, Florida officials told us that they developed guidance on evidence-based strategies that help districts establish a rationale for selecting interventions, assess whether the interventions are working as intended, and understand ESEA's evidence-based requirements.

**Table 4: Actions States Reported Taking to Help School Districts Select Evidence-based Interventions**

Selecting evidence-based practices	Number of states taking action
Worked one-on-one with district (e.g., regular phone or in-person meetings with district staff)	48
Provided written guidance, policies, and/or procedures	44
Provided training/professional development for district or school-level staff either online or in person	41
Provided models or templates for district use	39
Provided support to districts on communicating efforts (e.g., bullet points, fact sheets)	34
Facilitated peer to peer sharing among districts using working groups, listserv, or other interface	33
Provided a repository of evidence-based interventions	29
Provided support to districts on using resources from Regional Educational Laboratories or Comprehensive Centers	24
Provided assistance to districts in finding and selecting contractors	24
Updated technical infrastructure (e.g., to facilitate data transfer between districts and state)	23

Source: GAO analysis of survey of state officials. | GAO-21-199

## Resource Inequities

### Identifying Resource Inequities

The Elementary and Secondary Education Act requires districts with any identified comprehensive support and improvement schools to identify and address resource inequities. Additional targeted support and improvement schools—those that were identified for support and improvement based on low performance of individual student subgroups—must identify and address resource inequities. This process may include a review of district and school-level budgeting.

Source: 20 U.S.C. § 6311(d)(1)(B)(iv) and 20 U.S.C. § 6311(d)(2)(C). | GAO-21-199

Most states (35 of 51) reported having at least moderate capacity to help districts identify resource inequities; the other 16 states reported having minimal to no capacity to help districts identify resource inequities.<sup>34</sup> (See sidebar.) States reported taking several actions to help districts to identify resource inequities. (See table 5.) Still, most states (43 of 51) reported helping districts identify resource inequities as somewhat or very challenging. For example, Oregon officials told us that identifying inequities can be challenging because different agency divisions have to work together to help districts identify resource inequities when they may not have traditionally done so. They said program staff may have to coordinate more closely with divisions that work with financial and program data. Further, Indiana officials told us that resource inequities reviews are challenging because of the complexity of examining a wide variety of programs offered, such as early learning, advanced coursework, and afterschool programs.

<sup>34</sup> One state responded “don’t know” to our survey question.

**Table 5: Actions States Reported Taking to Help School Districts Identify Resource Inequities**

Identifying resource inequities reviews	Number of states taking action
Worked one-on-one with district (e.g., regular phone or in-person meetings with district staff)	24
Provided training/professional development for district or school-level staff either online or in person	22
Provided written guidance, policies, and/or procedures	18
Provided models or templates for district use	18
Provided support to district on communicating efforts (e.g., bullet points, fact sheets)	18
Updated technical infrastructure (e.g. to facilitate data transfer)	16
Facilitated peer to peer sharing among districts using working groups, listserv, or other interface	15
Provided assistance finding and selecting contractors	10
Provided support to districts on using resources from Regional Educational Laboratories or Comprehensive Centers	8

Source: GAO analysis of survey of state officials. | GAO-21-199

### States Are in the Early Stages of Reviewing School Districts' Resources

#### Resource Allocation Reviews

The Elementary and Secondary Education (ESEA) Act requires states to periodically review resource allocation for districts with a significant number of schools identified for comprehensive support and improvement and schools implementing targeted support and improvement plans.

Although not defined by ESEA, resource allocation refers to the mechanism by which districts distribute money and other inputs, such as staffing, to schools. This may include financial resources such as federal, state, and local funding. Resource allocation reviews can help districts compare spending across schools and assess whether changes in district allocation could help improve low-performing schools.

Source: 20 U.S.C. § 6311(d)(3)(A)(ii). Katherine Hagan, Hannah Jarmolowski, and Marguerite Roza, A Guide for SEA-Led Resource Allocation Reviews: Financial Transparency Reporting Requirements. (San Antonio, TX: Westat: Building State Capacity and Productivity Center at Edvance Research, Inc., September 2019). | GAO-21-199

A majority of states are in the early stages of conducting resource allocation reviews. (See sidebar.) In response to our survey, 15 states reported that they were currently conducting or had conducted resource allocation reviews, and 28 planned to do so in school year 2020-2021 or 2021-2022.<sup>35</sup> As previously noted, states responded to our survey before most states and school districts felt the impact of COVID-19, and their resource allocation plans could change as resources may have become constrained.

Fourteen of the 15 states that were currently conducting or had already conducted a resource allocation review reported reviewing a variety of resources in our survey.<sup>36</sup> (See table 6.)

<sup>35</sup> One state planned to conduct reviews in spring 2020. Four states did not indicate when their reviews would begin. Three states did not respond to this question.

<sup>36</sup> One state did not respond to this question.

**Table 6: Most Frequent Resources 14 States Reported Including in Their Most Recently Completed Resource Allocation Reviews**

Resource	Number of states reviewing resource
<b>Funding sources</b>	
Federal funding (including general funding and funds dedicated to school improvement)	13
State funding (including general funding and funds dedicated to school improvement)	12
Local funding (including general funding, funds dedicated to school improvement activities, grants, and other private funds)	8
<b>Staffing resources</b>	
Distribution of experienced teachers	11
Distribution of teachers teaching out-of-field	10
Distribution of effective teachers	9
Pupil-teacher ratios	8
School leadership	8
Instructional support staff (including school counselors, social workers, psychologists, other qualified professional personnel, paraprofessionals, and school librarians)	7
<b>Instructional resources</b>	
Student performance data	9
Access to rigorous coursework	8
Access to high-quality instructional materials	8
Instructional time and access	7
Access to prekindergarten and other early learning programs	7

Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from 14 states that reported having conducted resource allocation reviews in our survey.

Over three-quarters (41 of 51) of states plan to conduct resource allocation reviews at least once every 3 years. Nine states reported they had not yet determined a time period or reported another time period.<sup>37</sup>

Twenty-six states intend to conduct reviews of all districts in the state or with all districts with any identified school, and 20 states intend to conduct reviews of districts with “a significant number” of identified schools.<sup>38</sup>

<sup>37</sup> One state did not respond to this question.

<sup>38</sup> Three states reported including districts based on other criteria, such as having one or more schools identified as CSI schools. One state had not yet determined which districts to include, and one state did not respond to this question.

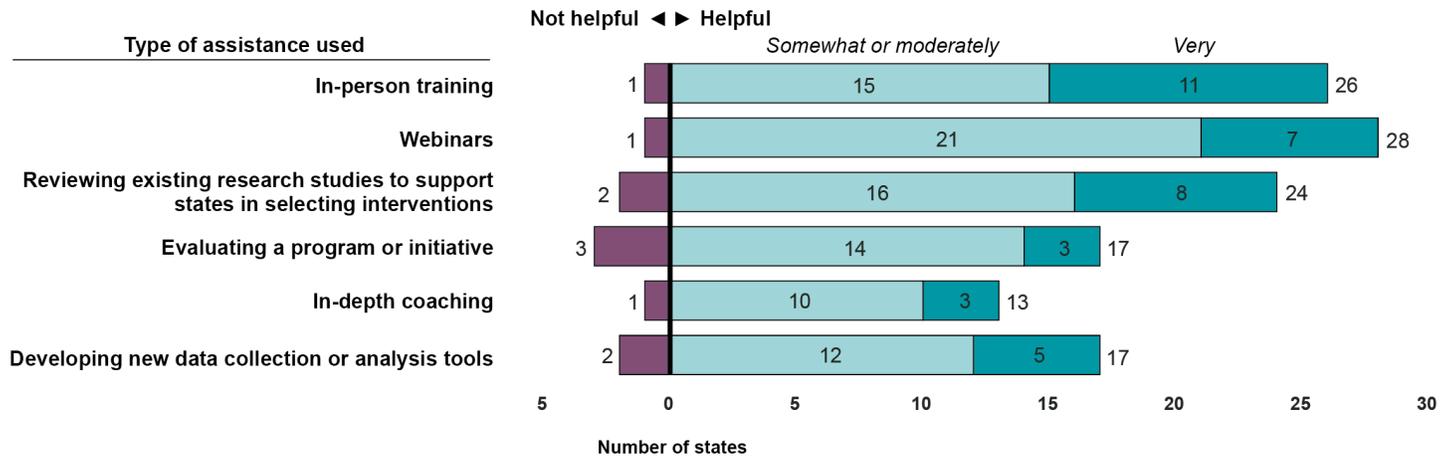
## Most States That Reported Using Education’s Technical Assistance Found It Helpful

According to our survey, one-half of all states sought at least one type of technical assistance from Education, and most of those found it helpful.

### Regional Educational Laboratories (REL)

Education’s RELs program supported a network of 10 laboratories that work in partnership with state educational agencies, districts, and other entities. Total funding in fiscal year 2019 for this network was about \$55 million. Each of the RELs serves a specific region and is responsible for building local and state capacity to use data and evidence, access high-quality research to inform decisions, and identify opportunities to conduct original research. Most states reported that several types of technical assistance provided by RELs were helpful. (See fig. 3.)

**Figure 3: Types of Technical Assistance Provided by Regional Educational Laboratories and Degree of Helpfulness Reported by States**



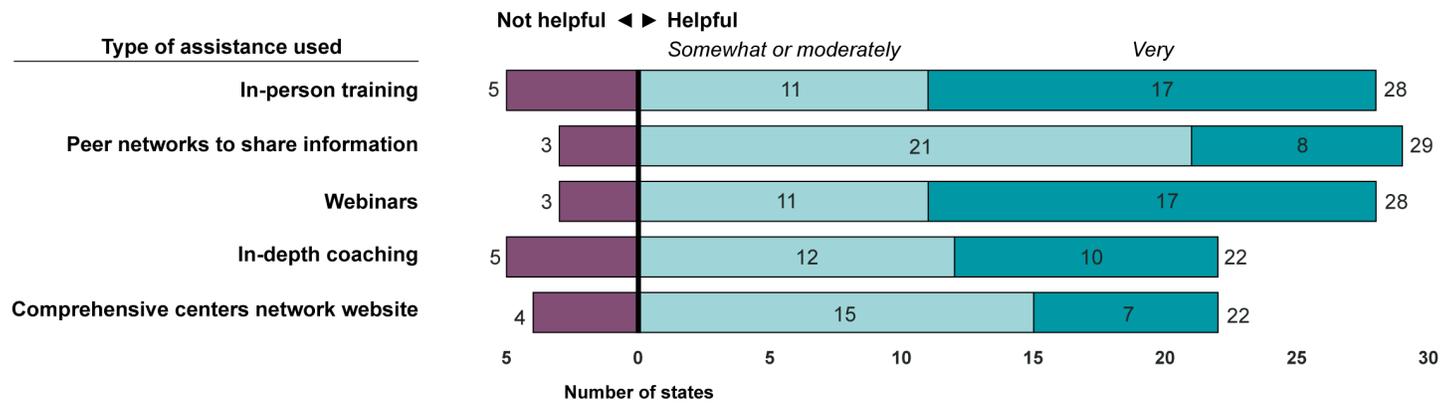
Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from states in our survey that reported having used the assistance.

### Comprehensive Centers Program

Education funded grants for 22 Comprehensive Centers from 2012 through 2018, including 15 Regional Centers and seven Content Centers, totaling \$350 million. In 2019, Education made new awards to 20 Comprehensive Centers, including 19 Regional Centers and one Content Center, totaling about \$50 million. These centers operate nationwide and focus on building the capacity of states to support districts in improving student outcomes, closing academic achievement gaps, and supporting low-performing districts and schools. States reported that several types of technical assistance provided by Comprehensive Centers program were helpful. (See fig. 4.)

**Figure 4: Types of Technical Assistance Provided by Comprehensive Centers Program and Degree of Helpfulness Reported by States**



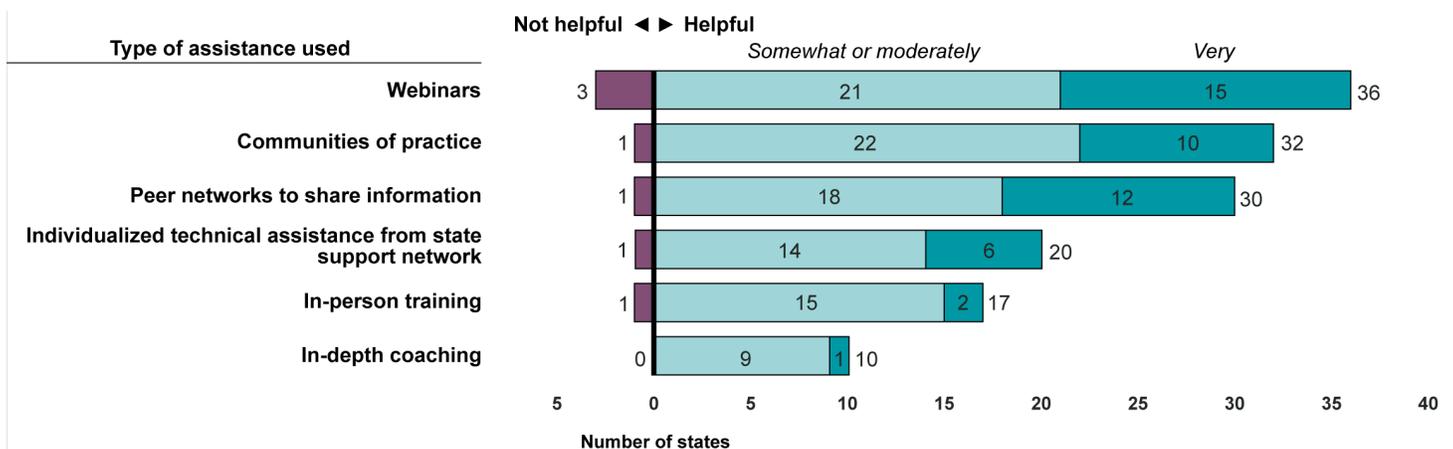
Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from states in our survey that reported having used the assistance.

## State Support Network

The State Support Network was a technical assistance initiative supported by Education from 2016 to 2020 designed to support state and district school improvement efforts. It brought states and districts together with technical assistance providers and subject matter experts to use research and resources to analyze practical challenges and develop strategies for supporting schools. States reported that several types of technical assistance provided by the State Support Network were helpful. (See fig. 5.)

**Figure 5: Types of Technical Assistance Provided by State Support Network and Degree of Helpfulness Reported by States**



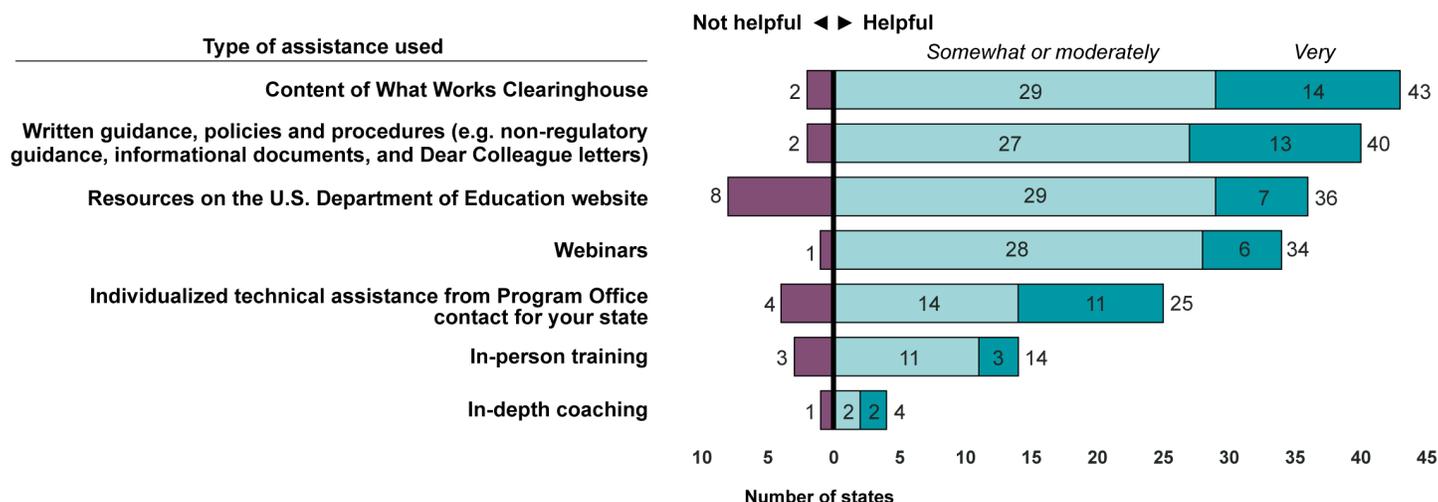
Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from states in our survey that reported having used the assistance.

Education’s Program Office

Education’s Office of School Support and Accountability oversees state implementation of Title I, Part A of ESEA. The office provides and coordinates technical assistance intended to help states work effectively with their districts, schools, and teachers to ensure that all students receive a high-quality education. States reported that several types of technical assistance provided by Education’s Program Office were helpful. (See fig. 6.)

**Figure 6: Types of Technical Assistance Provided by the Department of Education’s Program Office and Degree of Helpfulness Reported by States**



Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from states in our survey that reported having used the assistance.

Education officials told us that they work collaboratively across the different Education offices that provide technical assistance to states. In early 2019, Education conducted an inventory of technical assistance grants and contracts and is developing a broader inventory to facilitate collaboration among different Education offices that provide assistance to states. In addition, Education officials told us the RELs and the Comprehensive Centers have taken numerous steps to coordinate with one another and use their complementary services and expertise to meet the needs of states and districts. These steps include:

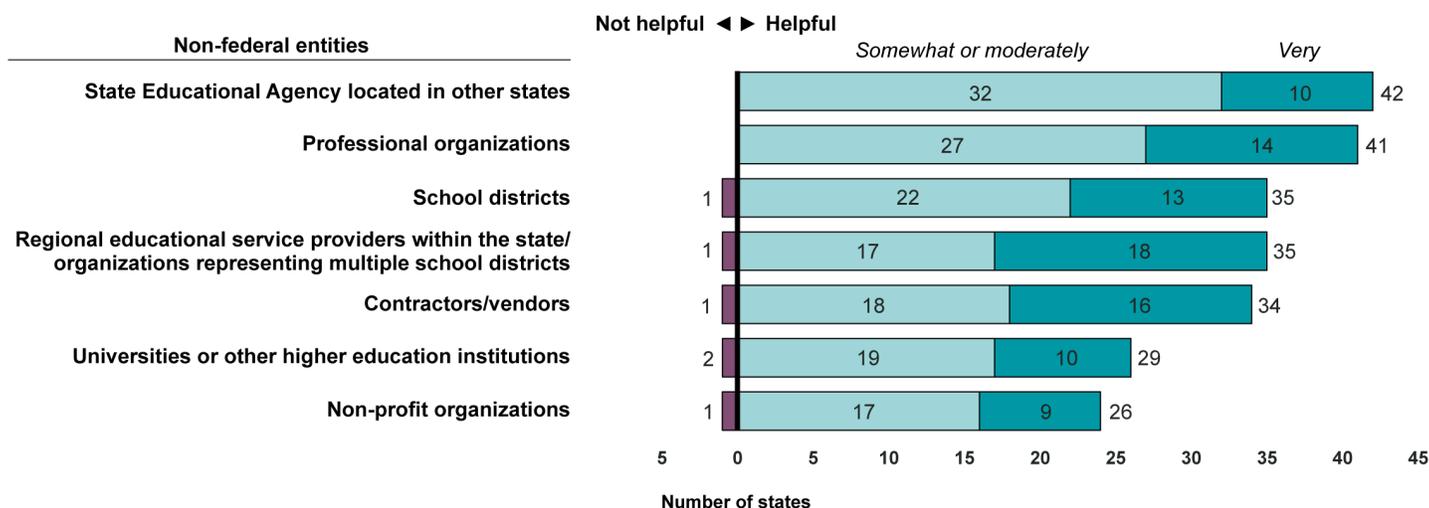
- (1) holding joint meetings with REL Directors and Comprehensive Center Directors annually to discuss their complementary roles and the ways they are coordinating their support to states and districts;

(2) conducting joint, in-person meetings with state leaders to determine which Education programs could best meet their needs. Education said that during the COVID-19 pandemic they will instead generally meet virtually, as needed.

(3) reporting regularly to Education project officers on how they communicate and coordinate with the REL or Comprehensive Center in their region.

Many states also reported that they receive assistance from nonfederal entities and nearly all of these states reported that most of these interactions were helpful. (See fig. 7.) Education officials also told us they coordinate with national organizations, such as the Council of Chief State School Officers, to ensure they are not duplicating activities of these entities.

**Figure 7: Types of Nonfederal Entities Providing Assistance with School Improvement Activities and Degree of Helpfulness Reported by States**



Source: GAO analysis of survey of state officials. | GAO-21-199

Note: Responses are from states in our survey that reported having used the assistance.

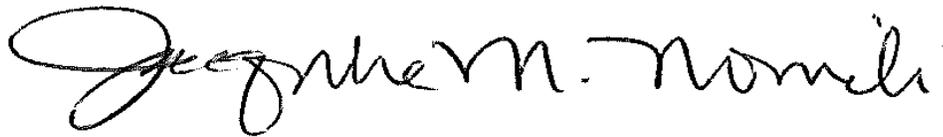
## Agency Comments

We provided a draft of this report to the Department of Education for review and comment. Education provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Education. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink that reads "Jacqueline M. Nowicki". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jacqueline M. Nowicki, Director  
Education, Workforce, and Income Security Issues

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# Appendix I: Survey to State Educational Agencies on School Improvement Activities

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GAO administered a web survey to state educational agencies in all 50 states and the District of Columbia. The survey began on December 17, 2019, and we received most responses prior to the onset of the Coronavirus Disease 2019 (COVID-19) pandemic in March 2020.<sup>1</sup> We received 51 responses for a 100 percent response rate. The survey included questions about states' most recent school improvement activities. Specifically, we asked questions related to: (1) the school improvement funds award process, and the timing and content of resource allocation reviews; (2) states' capacity and efforts to support districts and challenges faced; and (3) states' perception of the U.S. Department of Education's assistance to states.<sup>2</sup>

Certain questions were asked only of some respondents, depending on their answers to prior questions. Reprinted below are the survey questions that informed the information presented in this report.

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<sup>1</sup> We received four responses after March with the last response received in early June 2020.

<sup>2</sup> We also asked questions related to when and how many schools were identified for support and improvement for each category of school. This information was not included in this report because we focused on the process states used to identify schools for support and improvement.

**III. Title I School Improvement Subgrant Award Process**

Note: In this section, we are referring to school improvement subgrants made to local education agencies (LEAs) under section 1003 of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA).

23. How many **LEAs** applied for and received Title I school improvement funding for the following school years? *Instructions: If the information is not available, please write N/A.*

School Year	Total <b>LEAs That Applied</b> for Funding	Total <b>LEAs That Received</b> Funding
2018-2019		
2019-2020		

24. For each of the following years, what is the maximum and minimum Title I school improvement subgrant amount awarded to an **LEA** in the following school years? *Instructions: If the information is not available, please write N/A.*

School Year	Minimum Award (Dollars)	Maximum Award (Dollars)
2018-2019		
2019-2020		

25. How many Title I schools and non-Title I schools received school improvement funding for the following school years? *Instructions: If the information is not available, please write N/A.*

School Year	Total <b>Title I Schools</b> that Received Funding	Total <b>Non-Title I Schools</b> that Received Funding
2018-2019		
2019-2020		

26. For each of the following years, what is your states' minimum and/or maximum Title I school improvement subgrant award amount for a **school**? *Instructions: If the information is not available, please write N/A.*

School Year	Minimum Award (Dollars)	Maximum Award (Dollars)
2018-2019		
2019-2020		

27. What process does your state educational agency (SEA) use to allocate Title I school improvement subgrants to LEAs?

- A formula approach
- A competitive application process
- A combination of both formula and competitive processes
- Don't know
- Other
  - What other process does your SEA use?

28. For what time period(s) is the Title I school improvement subgrant awarded to LEAs?

- \_\_\_\_\_

#### IV. Resource Allocation Reviews

29. Which LEAs will be included in the resource allocation reviews required under ESSA?

- All LEAs in the state (skip to Q#31)
- All LEAs with identified schools (skip to Q#31)
- Only LEAs with a significant number of identified schools
- Other
  - What other LEAs will be included in the resource allocation reviews required under ESSA?

30. How does your SEA define a "significant" number of identified schools within an LEA for purposes of resource allocation reviews?

- 100 percent of schools identified
- At least 75 percent, but fewer than 100 percent of schools identified
- At least 50 percent, but fewer than 75 percent of schools identified
- At least 25 percent, but fewer than 50 percent of schools identified
- Fewer than 25 percent of schools identified
- Not yet defined
- Don't know
- Other
  - What is the other way your SEA defines significant?

31. How frequently will your SEA conduct resource allocation reviews?

- Annually
- Every 2 years
- Every 3 years

- Other time period
  - What is the other time period?

32. In what school year did or will your SEA conduct its first resource allocation review under ESSA?

- School year 2017-2018
- School year 2018-2019
- School year 2019-2020
- School year 2020-2021(skip to Q#41)
- Other
  - What is the other school year?

33. How many LEAs were included in the state's **most recently completed** resource allocation review?

34. Were the following **school funding sources** included in the state's **most recently completed** resource allocation review?

	Yes	No	Don't Know
a. Federal funding (including general funding and funds dedicated to school improvement activities)			
b. State funding (including general funding and funds dedicated to school improvement activities)			
c. Local funding (including general funding, funds dedicated to school improvement activities, grants and other private funds)			
d. Other financial resources			

- What other financial resources?

35. Were the following **staffing resources** included in the state's **most recently completed** resource allocation review?

	Yes	No	Don't Know
a. Distribution of effective teachers			
b. Distribution of experienced teachers			
c. Distribution of teachers teaching out-of-field			
d. Pupil-teacher ratios			
e. Instructional support staff (including school counselors, social workers, psychologists, other qualified professional personnel, paraprofessionals, and school librarians)			
f. School leadership			
g. Other staffing resources			

- What other staff resources?

36. Were the following **instructional resources** included in the state's **most recently completed** resource allocation review?

	Yes	No	Don't Know
a. Access to prekindergarten and other early learning programs			
b. Access to rigorous coursework			
c. Access to high quality instructional materials			
d. Instructional time and access			
e. Student performance data			
f. Other instructional resources			

- What other instructional resources?

37. Were the following **financial resources** included in the state's **most recently completed** resource allocation review?

	Yes	No	Don't Know
a. SEA budgeting			
b. LEA budgeting			
c. School-level budgeting			
d. Per pupil expenditures (LEA-level)			
e. Per pupil expenditures (school-level)			
f. Other financial resources			

- What other financial resources?

38. In the state's **most recently completed** resource allocation review, were needs assessments of **LEAs** included?

- Yes, needs assessments were conducted for all LEAs
- Yes, needs assessments were conducted for some LEAs
- No, a needs assessment was not part of the most recently completed resource allocation review (skip to Q#40)
- Don't know (skip to Q#40)

39. In the state's **most recently completed** resource allocation review, were needs assessments conducted for any **schools**?

- Yes
- No
- Don't know

40. In your state's **most recently completed** resource allocation review of LEAs, did your SEA take any of the following steps?

	Yes	No	Not Applicable	Unsure/Don't Know
a. Compare resources in LEAs with identified schools to resources in LEAs without identified schools				
b. Compare resources in identified schools to resources in non-identified schools within an LEA				
c. Compare resources in identified schools to resources in schools in LEAs without identified schools				
d. Determine whether resources are currently being allocated in a cost-effective manner				
e. Examine whether existing allocation of resources match the priorities included in school improvement plans				
f. Identify a need to collect new data				
g. Identify a need to bring on additional analytic expertise				
h. Develop plans to discuss results publicly				
i. Other steps taken				

- What other steps did your state take?

## V. State Support and Assistance

Note: We are defining **capacity** as an SEA's ability to provide assistance that strengthens an LEA's or school's ability to engage in continuous improvement and achieve expected outcomes.

41. How would you describe your current SEA's overall capacity to assist LEAs in the following aspects of the school improvement planning process under ESSA?

	Full Capacity	Almost Full Capacity	Moderate Capacity	Minimal Capacity	No Capacity	Don't Know

a. Developing school-level needs assessments						
b. Selecting evidence-based interventions						
c. Identifying resource inequities						
d. Other						

- What is the other aspect of the school improvement planning process under ESSA?

42. Since ESSA was enacted in December 2015, has your SEA taken any of the following actions to build the capacity across your SEA to support LEAs with identified schools?

	Yes, Action Taken	No, but Planning to Take Action	No, and Not Planning to Take Action	Don't Know
a. Reorganized existing SEA program offices across the SEA				
b. Created a support infrastructure that spans SEA divisions				
c. Contracted with vendor to provide technological expertise or specialty skills needed by the SEA				
d. Hired additional staff				
e. Established school improvement point of contact or office within the SEA				
f. Established an SEA point of contact for Regional Educational Laboratories or Comprehensive Centers				
g. Recruited or retained critical SEA staff				
h. Provided training/professional development for SEA staff				

i. Developed a mechanism to communicate with stakeholders				
j. Participated in peer to peer sharing with other SEAs using working groups, listserv or other interface				
k. Updated technical infrastructure (e.g., to facilitate data transfer between LEA and SEA)				
l. Facilitated peer to peer sharing among LEAs using working groups, listserv or other interface				
m. Other				

- o What is the other action taken or planned?

43. Has your SEA taken any of the following actions to help one or more LEAs develop **school-level needs assessments**?

	Yes, Action Taken	No, but Planning to Take Action	No, and Not Planning to Take Action	Don't Know
a. Provided written guidance, policies, and/or procedures				
b. Provided models or templates for LEA use				
c. Provided assistance finding and selecting contractors				
d. Worked one-on-one with LEA (e.g., regular phone or in-person meetings with LEA staff)				
e. Provided training/professional development for LEA or school-level staff either online or in person				
f. Provided support to LEAs on communicating				

efforts (e.g., bullet points, fact sheets)				
g. Facilitated peer to peer sharing among LEAs using working groups, listserv, or other interface				
h. Updated technical infrastructure (e.g., to facilitate data transfer between LEA and SEA)				
i. Provided support to LEAs on using resources from a Regional Educational Laboratories or Comprehensive Centers				
j. Other				

- What is the other action taken or planned?

44. Has your SEA taken any of the following actions to help one or more LEAs select **evidence-based interventions**?

	Yes, Action Taken	No, but Planning to Take Action	No, and Not Planning to Take Action	Don't Know
a. Provided written guidance, policies, and/or procedures				
b. Provided models or templates for LEA use				
c. Provided a repository of evidence-based interventions				
d. Provided assistance to LEAs in finding and selecting contractors				
e. Worked one-on-one with LEA (e.g., regular phone or in-person meetings with LEA staff)				

f. Provided training/professional development for LEA or school-level staff either online or in person				
g. Provided support to LEAs on communicating efforts (e.g., bullet points, fact sheets)				
h. Facilitated peer to peer sharing among LEAs using working groups, listserv, or other interface				
i. Updated technical infrastructure (e.g., to facilitate data transfer between LEA and SEA)				
j. Provided support to LEAs on using resources from a Regional Educational Laboratories or Comprehensive Centers				
k. Other				

- What is the other action taken or planned?

45. Has your SEA taken any of the following actions to help one or more LEAs identify **resource inequities**?

	Yes, Action Taken	No, but Planning to Take Action	No, and Not Planning to Take Action	Don't Know
a. Provided written guidance, policies, and/or procedures				
b. Provided models or templates for LEA use				

c. Provided assistance finding and selecting contractors				
d. Worked one-on-one with LEA (e.g., regular phone or in-person meetings with LEA staff)				
e. Provided training/professional development for LEA or school-level staff either online or in person				
f. Provided support to LEA on communicating efforts (e.g., bullet points, fact sheets)				
g. Facilitated peer to peer sharing among LEAs using working groups, listserv, or other interface				
h. Updated technical infrastructure (e.g., to facilitate data transfer)				
i. Provided support to LEAs on using resources from a Regional Educational Laboratories or Comprehensive Centers				
j. Other				

- What is the other action taken or planned?

46. Does your SEA provide different levels of technical assistance and support to LEAs for any of the following reasons?

	Yes	No	Don't Know
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a. High numbers/percentage of identified schools			
b. Category of identified schools			
c. Student subgroup			
d. Size of the LEA			
e. Geographic location of the LEA			
f. Other			

- What is the other reason?

47. How challenging has it been for your SEA to provide technical assistance and support to LEAs in the following school improvement planning efforts?

	Not at All Challenging	Somewhat Challenging	Moderately Challenging	Very Challenging	Not Applicable	Don't Know
a. Developing school-level needs assessments						
b. Selecting evidence-based interventions						
c. Planning resource inequities reviews						
d. Other Challenge						

- What is the other challenge?

48. In your efforts to provide technical assistance and support to LEAs with identified schools, how helpful was any assistance your SEA received from the following **nonfederal entities**?

	Very Helpful	Moderately Helpful	Somewhat Helpful	Not at All Helpful	Did Not Provide Any Assistance	Don't Know

a. Contractors/Vendors						
b. Universities or other higher education institutions						
c. Nonprofit organizations						
d. Regional educational service providers within the state/ organizations representing multiple LEAs						
e. SEAs located in other states						
f. Professional organizations						
g. LEAs						
h. Other assistance						

o What is the other assistance?

**VI. Role of the U.S. Department of Education**

49. How helpful have the U.S. Department of Education-funded **Regional Educational Laboratories (REL)** been in providing the following types of assistance to your SEA regarding LEAs' school improvement planning efforts?

	Very Helpful	Moderately Helpful	Somewhat Helpful	Not at All Helpful	Did Not Provide Any Assistance	Don't Know
a. Webinars						

b. In-person training						
c. In-depth coaching						
d. Evaluating a program or initiative						
e. Reviewing existing research studies to support states in selecting interventions						
f. Developing new data collection or analysis tools.						
g. Other assistance						

- What is the other assistance?

50. Since ESSA was enacted, how helpful have the U.S. Department of Education-funded **Comprehensive Centers** been in providing the following types of assistance to your SEA regarding LEAs' school improvement planning efforts?

	Very Helpful	Moderately Helpful	Somewhat Helpful	Not at All Helpful	Did Not Provide Any Assistance	Don't Know
a. Webinars						
b. In-person training						
c. In-depth coaching						
d. Comprehensive Centers network website						
e. Peer networks to share information						
f. Other assistance						

- What is the other assistance?

51. How helpful has the U.S. Department of Education-funded **State Support Network** been in providing the following types of assistance to your SEA regarding LEAs' school improvement planning efforts?

	Very Helpful	Moderately Helpful	Somewhat Helpful	Not at All Helpful	Did Not Provide Any Assistance	Don't Know
a. Webinars						
b. In-person training						
c. In-depth coaching						
d. Communities of Practice						
e. Peer networks to share information						
f. Individualized technical assistance from State Support Network						
g. Other assistance						

- What is the other assistance?

52. How helpful have the U.S. Department of Education's **Program Offices** been in providing the following types of assistance to your SEA regarding LEAs' school improvement planning efforts?

	Very Helpful	Moderately Helpful	Somewhat Helpful	Not at All Helpful	Did Not Provide Any Assistance	Don't Know
a. Written guidance, policies and procedures (e.g. non-regulatory guidance, informational documents, and Dear Colleague letters)						
b. Resources on the U.S. Department of Education website						
c. Webinars						
d. In-person trainings						
e. In-depth coaching						

f. Content of What Works Clearinghouse						
g. Individualized technical assistance from Program Office contact for your state						
h. Other assistance						

- What is the other assistance?

53. What, if any, additional guidance or technical assistance related to school improvement from the U.S. Department of Education would be useful for your agency?

- \_\_\_\_\_

**VII. Conclusion**

54. Please provide any additional comments you may have, if any, on implementing ESSA’s requirements related to identifying schools for support and improvement, resource allocation reviews, and/or establishing a statewide system of technical assistance and support?

55. Please provide a link to your state’s most recent ESSA report card.

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# Appendix II: GAO Contact and Staff Acknowledgments

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## GAO Contact

Jacqueline M. Nowicki (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Bill Keller (Assistant Director), Jamila Kennedy (Assistant Director), Sheranda Campbell (Analyst-in-Charge), Cheryl Jones, and Breanna Stevens made key contributions to this report. Also contributing to this report were Elizabeth Calderon, Bethany Graham, Mimi Nguyen, Gloria Proa, Kelly Rubin, Jerry Sandau, Monica Savoy, Joy Solmonson, and Almeta Spencer.

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