



January 2024

K-12 EDUCATION

Education Could Enhance Oversight of School Improvement Activities

GAO Highlights

Highlights of [GAO-24-105648](#), a report to congressional committees

Why GAO Did This Study

ESEA Title I, Part A purposes include providing all children the opportunity to receive a fair, equitable, and high-quality education. To help achieve that goal, states must identify schools in need of support and improvement. States oversee improvement efforts; Education monitors states' oversight.

Senate Report 115-289 includes a provision for GAO to review school improvement activities.

This report examines (1) CSI school characteristics; (2) how CSI plans address selected ESEA requirements; and (3) Education monitoring.

GAO compared the characteristics of CSI and other schools using 2019-20 Education data (the most recent available). GAO also analyzed a generalizable sample of CSI plans (the most recent available as of June 2022) to assess how they addressed three ESEA-required elements for plan content for which Education has issued guidance. GAO interviewed officials from three CSI schools selected for varied locale and other factors and held two discussion groups with officials from six districts with CSI schools across six states. GAO also interviewed Education officials and reviewed relevant federal laws and monitoring documents.

What GAO Recommends

GAO recommends that Education update monitoring protocols to independently select CSI plans for review. Education agreed with our recommendation and stated that it will independently select CSI plans for monitoring beginning in spring 2024.

View [GAO-24-105648](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov

January 2024

K-12 EDUCATION:

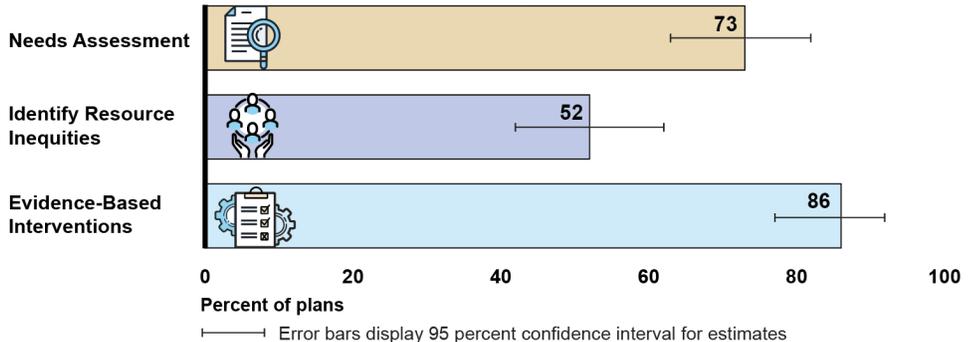
EDUCATION COULD ENHANCE OVERSIGHT OF SCHOOL IMPROVEMENT ACTIVITIES

What GAO Found

Roughly 2.5 million students attend a K-12 public school that their state has identified for comprehensive support and improvement (CSI) under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA). GAO found that CSI schools are among the lowest-performing schools in the nation. GAO also found that compared to other public schools, CSI schools are much more likely to serve predominantly Black and low-income students and those who are not proficient in reading or math. CSI schools also have higher student-teacher ratios than other schools.

In its review of a nationally generalizable sample of CSI school improvement plans, GAO estimated that less than half (42 percent) appeared to address all three required elements it reviewed, which include that the plan: (1) be based on a needs assessment, (2) identify resource inequities, and (3) include evidence-based interventions. Further, GAO identified wide variation among the CSI plans it reviewed. For instance, when identifying resource inequities, some plans focused on the types of inequities students faced in their own lives (e.g., poverty or homelessness). Other plans focused on how equitably educational resources (e.g., funding or teachers) were distributed across the district or within the school.

Estimated Percent of Comprehensive Support and Improvement Plans Available as of June 2022 that Appeared to Address Three Selected Required Elements



Source: GAO analysis of nationally generalizable sample of comprehensive support and improvement plans. GAO (images) | GAO-24-105648
Note: GAO did not independently assess legal compliance with its three selected Elementary and Secondary Education Act of 1965 requirements.

Education monitors state compliance with ESEA school improvement requirements (e.g., to approve CSI plans and monitor their implementation) and has identified and addressed compliance issues through its efforts. For example, Education found that five of the nine states it monitored from February 2020 through July 2023 failed to enforce ESEA requirements that CSI plans include all of the three elements GAO assessed. Education required the states to take corrective action to address these issues. However, Education's ability to identify these and other compliance issues may be limited by a weakness GAO identified in Education's monitoring approach. Specifically, Education does not select the CSI plans it reviews. Instead, it relies on monitored states and districts to do so. Ensuring that Education staff independently select these documents could help Education better assure that it is identifying and responding to compliance risks through this key part of its monitoring strategy.

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Abbreviations

ATSI	additional targeted support and improvement
Clearinghouse	What Works Clearinghouse
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
TSI	targeted support and improvement

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January 30, 2024

Congressional Committees

Title I, Part A of the Elementary and Secondary Education Act of 1965 (Title I), as reauthorized and amended by the Every Student Succeeds Act in 2015 (ESEA) seeks to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.¹ To help achieve that purpose, it requires states to identify three categories of schools for support and improvement, including comprehensive support and improvement (CSI) schools. In partnership with stakeholders, school districts locally develop and implement plans (CSI plans) to improve student outcomes. States are required to review and approve these plans and set aside a portion of federal dollars authorized under Title I to support school improvement efforts. The Department of Education monitors state oversight of school improvement and other Title I requirements.

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 examines (1) the characteristics of CSI schools; (2) how CSI plans address selected elements required by the ESEA; and (3) the extent to which the Education monitors state oversight of CSI requirements.

To answer these questions, we first analyzed the characteristics of CSI schools and compared them to those of other public schools using data from Education’s *EDFacts* database and the Common Core of Data from the 2019-2020 school year.² We assessed the reliability of both data sources by reviewing documentation about the data, conducting our own electronic data tests, and interviewing federal officials knowledgeable

¹Title I 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.

²Data from the 2019-20 school year was the most recent complete CSI school identification data available as of March 2023. *EDFacts* is an Education initiative to centralize data provided by states, including performance data on public schools (pre-K through grade 12), and financial grant information. Through its *EDFacts* data system, Education also collects data on schools’ improvement status, the reason for identification, and grant funding provided to support these schools’ improvement efforts, among other things. Education administers the Common Core of Data survey annually to collect a range of data on the characteristics of all public schools and school districts in the nation.

about the data sets we used. We determined that the data were sufficiently reliable for our purposes of comparing characteristics of CSI schools with those of other school types and selecting a sample of CSI schools.³

We next reviewed a nationally generalizable sample of CSI plans. We drew our sample from an overall population of 5,112 CSI schools, obtained from Education's *EDFacts* data system for the 2019-2020 school year, the most recent year of data identifying CSI schools as of March 2023.⁴ We used the most recent available plan for each of the schools in our sample.⁵ We designed our initial sample size to have a margin of error no greater than plus or minus 10 percentage points at the 95 percent level of confidence for any of our measurements, then added five additional plans to arrive at an initial sample size of 100. Prior to selecting our sample, we sorted CSI schools by state. We then selected a systematic random sample of 100 schools. We contacted districts to obtain the CSI plan for each school in our sample. Through our file review, we removed 10 schools because we determined them to be out of scope. Specifically, five schools were misclassified as CSI schools, four were not required to complete a CSI plan, and one had closed. We assumed simple random selection for purposes of analyzing the sample results. We provide confidence intervals along with each sample estimate in the report.⁶ All sample estimates presented in the body of this report are generalizable to the estimated population of in-scope CSI plans.⁷ We analyzed our sample of plans to determine how the plans' content addressed three required elements for which Education has issued

³For one state (West Virginia), the list of schools identified as CSI also included schools in other support and improvement categories (targeted- and additional targeted support and improvement). We included these schools in our analysis of CSI school characteristics.

⁴Public, including charter CSI schools located in the 50 U.S. states and the District of Columbia were included in the population.

⁵We asked states to provide the most recent CSI plan for each of these schools as of June 2022. Most states provided plans for the 2021-2022 school year.

⁶Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn. Since each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval. This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn.

⁷Estimates have been rounded to the nearest percentage point.

nonbinding guidance.⁸ These requirements are to (1) be based on a school-level needs assessment; (2) identify resource inequities, which may include a review of school district and school-level budgeting, to be addressed by the school by implementing the plan; and (3) include evidence-based interventions.⁹ We did not independently assess any plan’s legal compliance with the ESEA requirements.

To learn about officials’ CSI planning experiences, we interviewed principals and other school leaders from three CSI schools that were included in our sample, selected based on criteria such as geographic diversity and use of a CSI plan template.¹⁰ We also worked with a national association for school superintendents to organize two discussion groups with district-level officials. Through the association, we contacted all association members from districts with CSI-identified schools and received replies from 18 officials. Ten officials representing six districts from six states participated in one of the two discussion groups.¹¹

Finally, to evaluate the extent to which Education monitors state oversight of school improvement requirements, we reviewed relevant federal laws and guidance, and interviewed Education officials. We also reviewed Education monitoring protocols and findings from monitoring reports issued between February 2020 (the first to include a comprehensive review of the Every Student Succeed Act (ESSA) requirements), and July 2023. We assessed Education’s monitoring practices against standards for internal control in the federal government.¹²

We conducted this performance audit from January 2022 to January 2024 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

⁸Other requirements for CSI plans under the ESEA cover things such as stakeholder engagement and state and local responsibilities for approving plans and monitoring implementation.

⁹We took steps to minimize non-sampling errors by having two analysts independently review each CSI plan and reconcile any differences in data collected.

¹⁰We ensured we captured geographic diversity by selecting schools representing regions defined by Education.

¹¹The interviews and discussion groups are not generalizable.

¹²GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 10, 2014).

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

Background

Identifying Schools for Support and Improvement

Under the ESEA, states must identify schools for three categories of support and improvement: (1) targeted support and improvement (TSI); (2) additional targeted support and improvement (ATSI); and (3) comprehensive support and improvement (CSI). Schools identified for CSI must include (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 a third or more of their students, and (3) Title I schools previously identified for ATSI that have not improved within a certain number of years as determined by the state.¹³

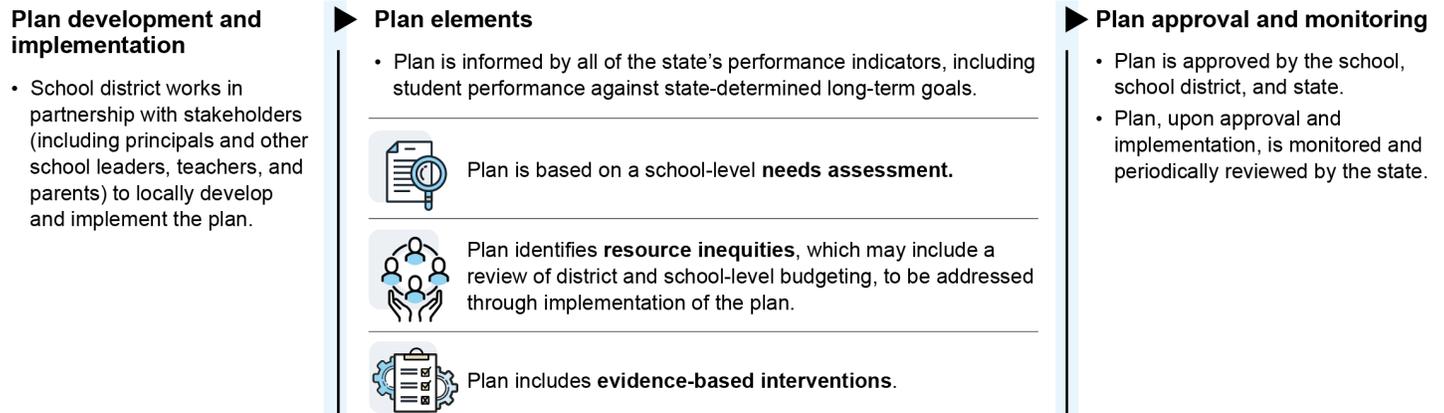
Support and Improvement Plan Requirements

Under the ESEA, support and improvement plans must generally be developed and implemented for all three categories of schools. Districts, in partnership with stakeholders, locally develop and implement CSI plans. By contrast, schools, in partnership with stakeholders, develop and implement school-level TSI and ATSI plans. In all cases, these stakeholders include the school's principals and other school leaders, teachers, and parents.

Requirements for CSI plans include that they (1) be based on a school-level needs assessment, (2) identify resource inequities to be addressed through the plan's implementation, and (3) include evidence-based interventions. The state must also approve and monitor CSI plan implementation (see fig. 1).

¹³TSI schools are 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 as determined by the state. ATSI schools are public schools in which one or more student subgroups are performing at or below the lowest-performing CSI schools in the state. See, GAO, *K-12 Education: Observations on States' School Improvement Efforts*, GAO-21-199 (Washington, D.C.: Jan. 11, 2021) for more information on how states identify low-performing schools.

Figure 1: Comprehensive Support and Improvement (CSI) Plan Requirements



Source: GAO analysis of 20 U.S.C. § 6311(d)(1)(B). GAO (images). | GAO-24-105648

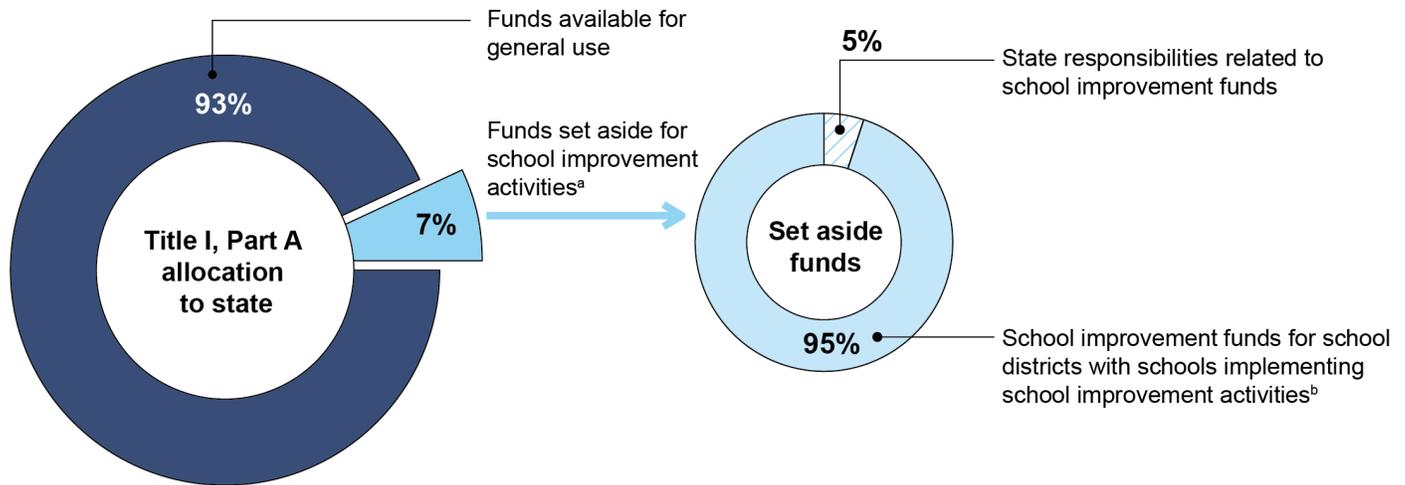
CSI plans may serve as a guide to CSI schools’ improvement process, and Education has issued a variety of guidance to help districts and schools develop and implement effective plans.¹⁴

Federal Funding to Support School Improvement

Under the ESEA, states are generally required to set aside at least 7 percent of their federal Title I funding each year to support school improvement activities (see fig. 2).

¹⁴Department of Education, “School Improvement: Needs Assessment” (Washington, D.C.: Sep. 1, 2020), accessed June 15, 2023, <https://oese.ed.gov/resources/oese-technical-assistance-centers/state-support-network/resources/school-improvement-needs-assessment/>; “Frequently Asked Questions, Impact of COVID-19 on 2021-2022 Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)” (Washington, D.C.: Feb. 2022); and “School Improvement: Strategy Selection” (Washington, D.C.: Sep. 1, 2020), accessed June 15, 2023, <https://oese.ed.gov/resources/oese-technical-assistance-centers/state-support-network/resources/school-improvement-strategy-selection/>.

Figure 2: Funding for School Improvement through the Elementary and Secondary Education Act of 1965, as Amended (ESEA) Title I, Part A



Source: GAO analysis of 20 U.S.C. § 6303(a) and (b). | GAO-24-105648

Note: Title I, Part A of the 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.

^aStates are generally required to set aside 7 percent of their Title I, Part A funds.

^bStates, 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.

States may make school improvement funds available as grants for school districts to serve schools implementing support and improvement activities.¹⁵ States may allocate these funds using a formula, competitive, or hybrid process.¹⁶ Districts may generally use school improvement funds for any activity that they determine will help a CSI, TSI, or ATSI school improve student outcomes. However, evidence-based interventions must demonstrate a statistically significant effect on

¹⁵States, with district approval, may use school improvement funding to provide services directly to districts. When allocating funds, the ESEA requires states to prioritize districts that serve high numbers or high percentages of schools implementing support and improvement plans; demonstrate the greatest need for such funds, as determined by the state; and demonstrate the strongest commitment to using the funds to enable the lowest-performing schools to improve student achievement and student outcomes.

¹⁶Regardless of a state's allocation process, school districts must apply to receive these funds.

improving student outcomes or other relevant outcomes based on specific standards as defined under the ESEA.¹⁷

Education Oversight

Education’s Office of Elementary and Secondary Education is responsible for overseeing implementation of the ESEA school improvement provisions. Education awards Title I funding to states and is responsible for monitoring how states meet their school improvement responsibilities under the ESEA. Among other things, these state responsibilities include (1) identifying schools for support and improvement; (2) approving and monitoring implementation of CSI plans; and (3) allocating school improvement funding to districts with schools implementing CSI, TSI, or ATSI plans.

Education monitors state compliance with these and other ESEA requirements through routine monitoring. It selects several states per year for this monitoring based on a variety of risk factors. Education also conducts targeted monitoring initiatives to address areas of particular concern. If Education finds areas of significant compliance and quality concerns through its monitoring, it will require the state to take corrective action. Education shares its findings and any corrective actions with monitored states in a publicly available report.¹⁸

CSI Schools Serve Higher Proportions of Vulnerable Students and Have Much Lower Proficiency Rates than Other Public Schools

In school year 2019-2020—the most recent year of complete data at the time of our review—about 5,200 CSI schools enrolled about 2.5 million students, or 5 percent of all public school students.¹⁹ We found that their characteristics are distinct from Title I schools as a whole—even though nearly 90 percent of CSI schools are also Title I schools—and other U.S.

¹⁷Specifically, outcomes must be based on (1) strong evidence from at least one well-designed and well-implemented experimental study; (2) moderate evidence from at least one well-designed and well-implemented quasi-experimental study, or (3) promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias. 20 U.S.C. § 7801(21).

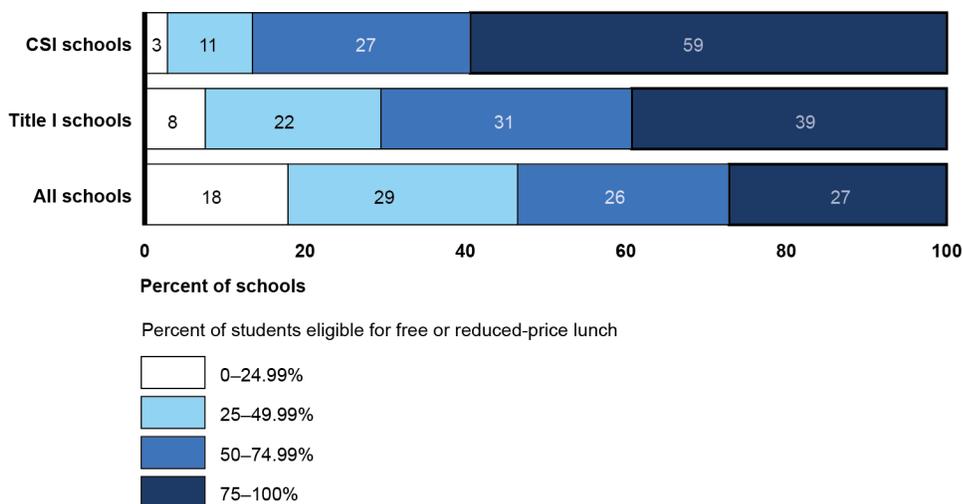
¹⁸Education officials said if a state does not take action in a timely fashion, Education may take escalating actions to spur compliance, including putting a condition on a grant or as a last resort, withholding grant funds.

¹⁹Due to COVID-19 related school closures, Education did not collect data files on schools identified for support and improvement for the 2020-2021 school year. For similar reasons, Education is not releasing the 2021-2022 school identification status data.

public schools.²⁰ In particular, our analysis showed that CSI schools much more commonly have predominantly low-income and Black student populations and very low rates of student proficiency on state math and reading assessments, compared to all Title I schools and all public schools.²¹ CSI schools also have slightly higher student-teacher ratios than other public schools.

Family income levels. CSI schools, like Title I schools, have high numbers of low-income students; however, a higher proportion of CSI schools are predominantly composed of students who qualify for free or reduced-priced lunch—a common proxy for poverty—compared to all Title I schools. Specifically, we found that almost 60 percent of CSI schools are predominantly composed of students qualifying for free or reduced-priced lunch.²² This rate is 1.5 times greater than for all Title I schools, and more than twice that found in all public schools (see fig. 3).

Figure 3: K-12 Public Schools, by Type, by Percent of Students Eligible for Free or Reduced-Price Lunch, 2019-2020 School Year



Source: GAO analysis of Department of Education Common Core of Data and EDData data for the school year 2019-20. | GAO-24-105648

²⁰Title I schools have high numbers or proportions of children from low-income families.

²¹Education's Common Core of Data uses the following race and ethnicity categories: (1) American Indian/ Alaska Native, (2) Asian, (3) Hispanic, (4) Black, (5) Hawaiian Native/ Pacific Islander, (6) White, and (7) two or more races.

²²We considered schools to be predominantly composed of students who qualified for free or reduced-price lunch if 75 percent or more of students qualified for free or reduced-price lunch.

Notes: Title I schools are schools that receive funding authorized under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA) because they have high numbers or proportions of children from low-income families. This funding is provided to help ensure that all children meet academic standards. Schools identified for comprehensive support and improvement (CSI) include not fewer than the lowest-performing 5 percent of all Title I schools in the state, all public high schools that do not graduate a third or more of their students, and Title I schools previously identified for a certain category level of support and improvement that have not improved within a certain number of years as determined by the state.

Students from low-income families can face unique learning challenges, as described by CSI plans in our nationally generalizable sample (see textbox). Our prior work has also shown the strong link between poverty and other student stressors, including family instability and reduced rates of school attendance.²³

Educators Describe the Experiences of Their Students:

[Our] student population draws from a community with one of the highest poverty levels and lowest parent education levels in the district.

[Our school] has a lot of transient students . . . [and a] constant inability to contact parents due to phone disconnection.

We have supported students in acquiring the basic needs of food and clothing in order to help them focus on learning.

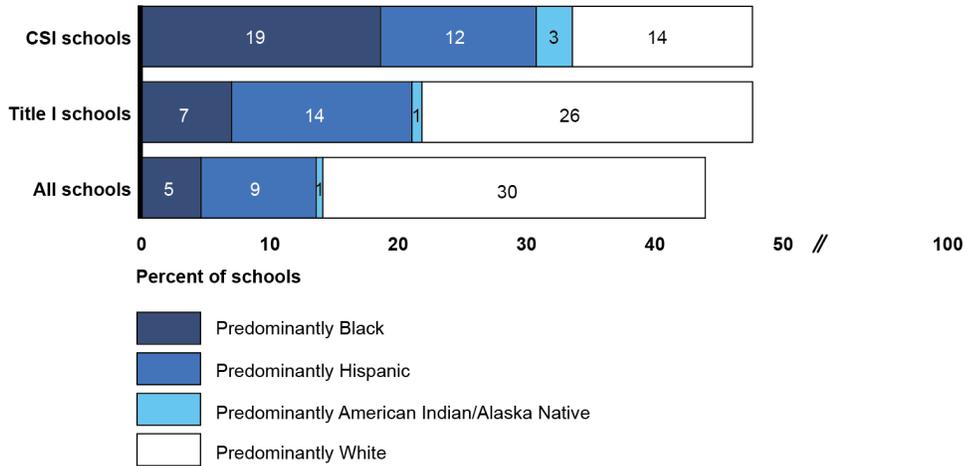
Our challenges stem from food insecurity, above-average transient housing status, and a lack of quality health care.

Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. | GAO-24-105648

Race/ethnicity. We also found that CSI schools much more commonly serve predominantly Black student populations than all Title I schools and all public schools nationwide (see fig. 4). CSI schools also enroll higher percentages of American Indian/Alaska Native students than other school types. Nationally, less than 1 percent of schools are predominantly American Indian/Alaska Native compared to 3 percent of CSI schools.

²³See, for example, GAO, *Child Well-Being: Key Considerations for Policymakers Including the Need for a Federal Cross-Agency Priority Goal*, GAO-18-41SP (Washington, D.C.: Nov. 9, 2017); *K-12 Education: Discipline Disparities for Black Students, Boys, and Students with Disabilities*, GAO-18-258 (Washington, D.C.: Mar. 22, 2018).

Figure 4: K-12 Public Schools, by Type, with Predominantly (75 Percent or More) Same-Race/Ethnicity Student Bodies, 2019-2020 School Year

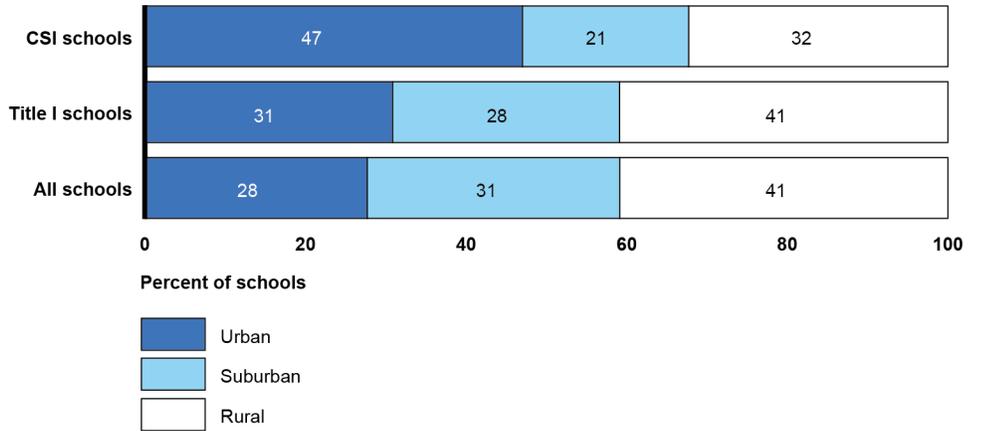


Source: GAO analysis of Department of Education Common Core of Data and ED*Facts* data for the school year 2019-20. | GAO-24-105648

Notes: Title I schools are schools that receive funding authorized under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended, (ESEA) because they have high numbers or proportions of children from low-income families. This funding is provided to help ensure that all children meet academic standards. Schools identified for comprehensive support and improvement (CSI) include not fewer than the lowest-performing 5 percent of all Title I schools in the state, all public high schools that do not graduate a third or more of their students, and Title I schools previously identified for a certain category level of support and improvement that have not improved within a certain number of years as determined by the state. The numbers shown in the figure reflect rounding; the actual percent of schools that are predominantly American Indian/Alaska Native nationally is less than 1 percent. The percent of schools that are predominantly made up of students who are Asian, Hawaiian Native/ Pacific Islander, or two or more races is too small to appear on this chart.

Locale. In addition, CSI schools are more likely to be located in urban areas compared to all Title I schools and all schools (see fig. 5).

Figure 5: K-12 Public Schools, by Type, in Urban, Suburban, or Rural Areas, 2019-2020 School Year



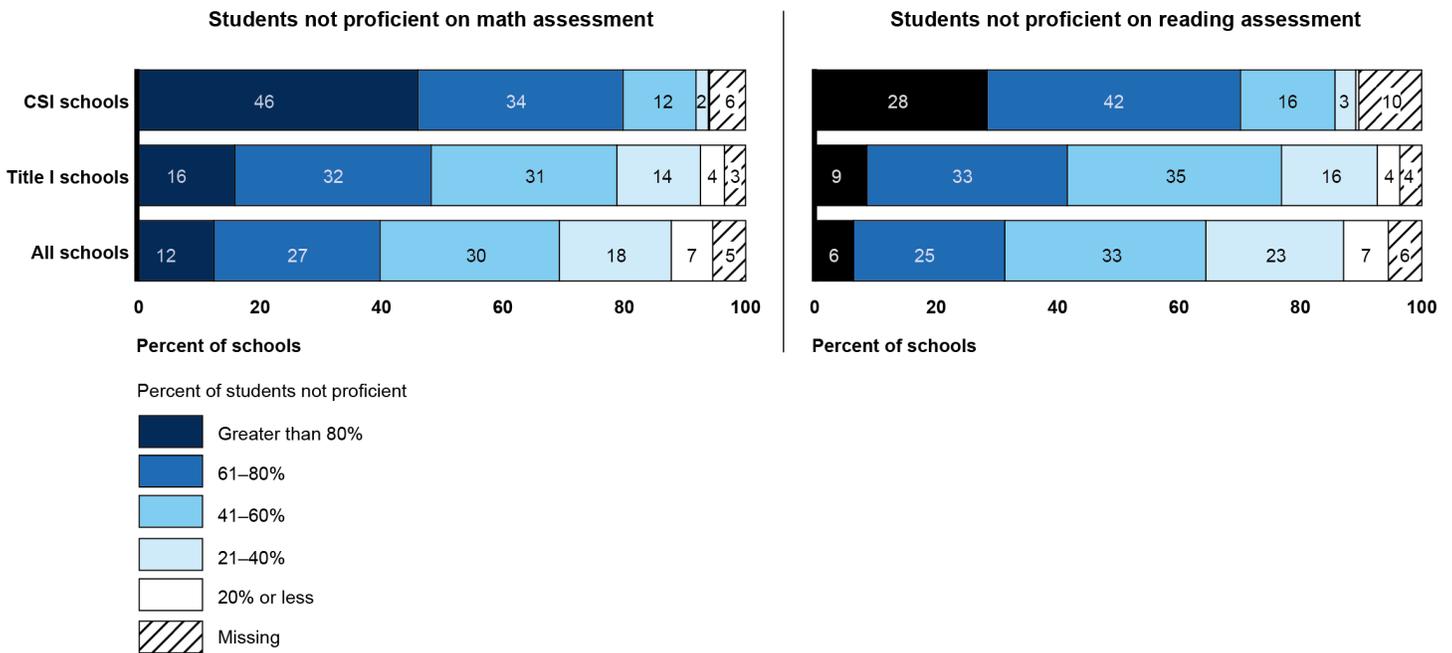
Source: GAO analysis of Department of Education Common Core of Data and EDFacts data for the school year 2019-20. | GAO-24-105648

Notes: Title I schools are schools that receive funding authorized under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended, (ESEA) because they have high numbers or proportions of children from low-income families. This funding is provided to help ensure that all children meet academic standards. Schools identified for comprehensive support and improvement (CSI) include not fewer than the lowest-performing 5 percent of all Title I schools in the state, all public high schools that do not graduate a third or more of their students, and Title I schools previously identified for a certain category level of support and improvement that have not improved within a certain number of years as determined by the state.

Academic outcomes. CSI schools include the lowest-performing 5 percent of all Title I schools. However, there are sizable differences in proficiency rates on annual state math and reading assessments for students at CSI schools compared to all Title I schools and all public schools. Specifically, our analysis showed that in nearly half of CSI schools, at least four in five students are not proficient in math.²⁴ In more than one-quarter of CSI schools, at least four in five students are not proficient in reading (see fig. 6). These rates are about three times higher than those of all Title I schools and higher still than those of all schools.

²⁴Analysis is inclusive of elementary, middle, and high school students. The assessments are generally administered annually in grades 3–8 and at least once in grades 9–12.

Figure 6: K-12 Public Schools, by Type, by Percent of Students Not Proficient on Math and Reading Assessments, 2019-2020 School Year



Source: GAO analysis of Department of Education ED²Facts school identification data for school year 2019-20, and proficiency data from school year 2018-19. | GAO-24-105648

Notes: Title I schools are schools that receive funding authorized under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended, (ESEA) because they have high numbers or proportions of children from low-income families. This funding is provided to help ensure that all children meet academic standards. Schools identified for comprehensive support and improvement (CSI) include not fewer than the lowest-performing 5 percent of all Title I schools in the state, all public high schools that do not graduate a third or more of their students, and Title I schools previously identified for a certain category level of support and improvement that have not improved within a certain number of years as determined by the state. GAO used school identification data from 2019-20 and the most recent proficiency data available, from 2018-19. Due to rounding, shares may not total to 100 percent.

We also found that CSI schools have slightly higher student-teacher ratios than all Title I schools and all public schools, suggesting larger class sizes. On average, CSI schools had 18.5 students per teacher in the 2019-2020 school year. By comparison, there were an average of 17.5 students per teacher in all Title I schools and all public schools. This difference was largest for middle schools, with 19.0 students per teacher compared to 17.7 for all Title I middle schools and 17.4 for all public middle schools. In our interviews and in CSI plans, district and school officials noted that teacher shortages, teacher attrition, and teacher turnover were particular barriers to improving student proficiency (see textbox with illustrative examples from CSI plans).

Educators Describe Challenges Hiring and Retaining Experienced Teachers in Their CSI Plans:

[It is] less desirable to work in schools that are high need. [Our] non-existent sub pool forces us to take people who are uncertified.

We had [a] high percentage of teacher turnover. Many teachers have less than 5 years' experience and needed additional support.

[Our] high turnover rate has resulted in hiring inexperienced teachers with a lack of in-depth understanding of the standards, and a lack of effective instructional strategies.

Inexperienced teachers are not providing the depth [of] instruction at the rigor level necessary to result in high student achievement and growth.

Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. | GAO-24-105648

Most CSI Plans Did Not Appear to Address All Selected Required Elements, and Some Officials Reported Challenges Developing Plans

Most CSI Plans Did Not Appear to Address All Selected Required Elements

Selected Comprehensive Support and Improvement (CSI) Plan Elements

Districts, in partnership with stakeholders (including principals and other school leaders, teachers, and parents) generally must locally develop and implement an improvement plan for each CSI school. These plans must, among other things:

1. be based on a school-level needs assessment;
2. identify resource inequities that are to be addressed through implementation of the plan; and
3. include evidence-based interventions.

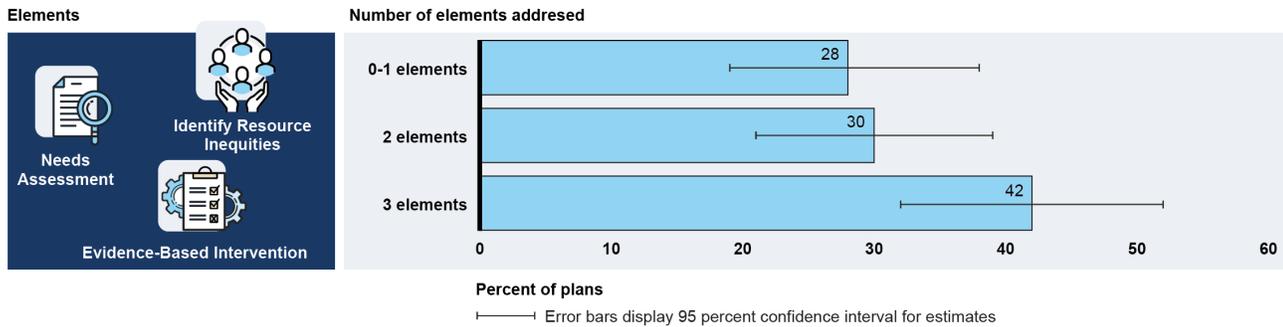
Source: 20 U.S.C. § 6311(d)(1)(B). | GAO-24-105648

Based on our review of a nationally generalizable sample of CSI plans, which may guide CSI schools' improvement efforts, we estimate that about two out of every five CSI plans nationwide (42 percent) appeared to address the three required elements we reviewed (see sidebar).²⁵ Almost a third (30 percent) of plans appeared to address two elements, and over a quarter (28 percent) appeared to address either one or no elements (see fig. 7).²⁶

²⁵The 95 percent confidence interval for this estimate is 32 to 52. We rounded all statistical values to the nearest whole percentage point. We categorized CSI plans as appearing to address all three elements we reviewed if they (1) contained a needs assessment or referenced a separate needs assessment, (2) discussed resource inequities or stated that a review of resource inequities had been conducted, and (3) included at least one intervention. We did not independently assess whether cited interventions met the ESEA definition of evidence-based. Furthermore, we did not independently assess legal compliance with ESEA requirements.

²⁶The 95 percent confidence interval for plans which addressed two elements is 21 to 39. The 95 percent confidence interval for schools which addressed one or no elements is 19 to 38.

Figure 7: Estimated Percent of Comprehensive Support and Improvement Plans That Appeared to Address Selected Required Elements



Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. GAO (images). | GAO-24-105648

Notes: GAO reviewed the most recent CSI plans available as of June 2022 from a nationally generalizable sample of schools identified for CSI in the 2019-2020 school year (the most recent year available at the time of our review). GAO assessed whether the plans (1) appeared to be based on a needs assessment, (2) appeared to identify resource inequities, and (3) appeared to include evidence-based interventions. These three elements are requirements under the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), 20 U.S.C. § 6311(d)(1)(B). GAO considered that these elements appeared to be addressed if a plan (1) contained a needs assessment or referenced a separate needs assessment, (2) discussed resource inequities or stated that a review of resource inequities had been conducted, and (3) included at least one intervention. GAO considered a plan as including an “intervention” if it had specific strategies or activities that appeared to be geared toward improving student outcomes or other related outcomes (e.g., teacher performance). GAO did not independently assess whether cited interventions met the ESEA definition of evidence-based. Furthermore, GAO did not independently assess legal compliance with ESEA requirements.

We also found wide variation in how CSI plans addressed each of the three elements we reviewed—needs assessments, identification of resource inequities, and evidence-based interventions.

Needs Assessments

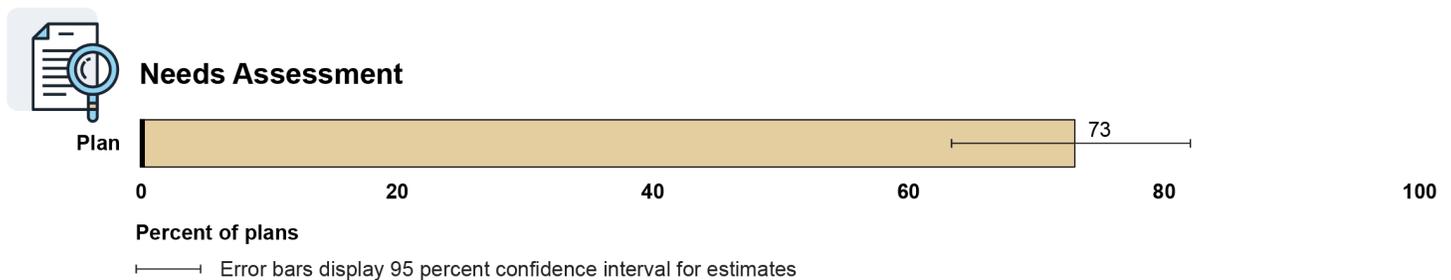
Needs Assessment

According to Education’s nonbinding guidance, the purpose of a needs assessment is to help districts and schools (1) identify and prioritize performance gaps (or “needs”); (2) isolate root causes of prioritized needs; and (3) select appropriate strategies to address those root causes, among other things. When done well, a needs assessment can help a district and school understand how pieces of a complex educational system interact, uncover a school’s strengths and challenges, and develop strategies to address challenges.

Source: Department of Education, “School Improvement: Needs Assessment” (Washington, D.C.: Sep. 1, 2020), accessed November 21, 2023. <https://oese.ed.gov/resources/oese-technical-assistance-centers/state-support-network/resources/school-improvement-needs-assessment/>. | GAO-24-105648

We estimate that nearly three quarters (73 percent) of CSI plans nationwide appeared to be based on an ESEA-required school-level needs assessment—meaning, the plans contained a needs assessment or referred to a separate needs assessment (see fig. 8).²⁷ Among the CSI plans we reviewed, some identified and prioritized the school’s most pressing performance gaps for action and zeroed in on specific root causes the school could address. These are practices recommended in Education’s nonregulatory, nonbinding guidance, created to help states and district leaders implement requirements in the law (see sidebar). As an example, one CSI plan prioritized taking action to address low reading proficiency among students with disabilities. This plan identified teachers’ lack of understanding of how diagnoses like dyslexia impact literacy needs, and how to use evidence-based interventions to guide specialized instruction for students with dyslexia and others with disabilities as root causes of this problem. The plan also developed strategies to address this root cause, which included providing training on implementing appropriate and effective reading interventions for students with dyslexia.

Figure 8: Estimated Percent of Comprehensive Support and Improvement Plans that Appeared to Be Based on a Needs Assessment or Contained or Referenced a Separate Needs Assessment



Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. GAO (images). | GAO-24-105648

Notes: GAO reviewed the most recent CSI plans available as of June 2022 from a nationally generalizable sample of schools identified for CSI in the 2019-2020 school year (the most recent year available at the time of our review). Under the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), the plans must be based on a needs assessment. 20 U.S.C. § 6311(d)(1)(B)(iii). GAO assessed whether each plan contained a needs assessment or referenced a separate needs assessment. GAO did not independently assess legal compliance with the ESEA requirements.

Other plans included needs assessments that did not reflect practices Education guidance indicates are important to conducting a meaningful and actionable review of a school’s needs. For instance, some plans neither identified nor prioritized specific performance gaps for action.

²⁷The 95 percent confidence for this estimate is 63 to 82.

Others included some root causes that were outside of the school’s sphere of influence, such as students’ work or family obligations.²⁸

Identify Resource Inequities

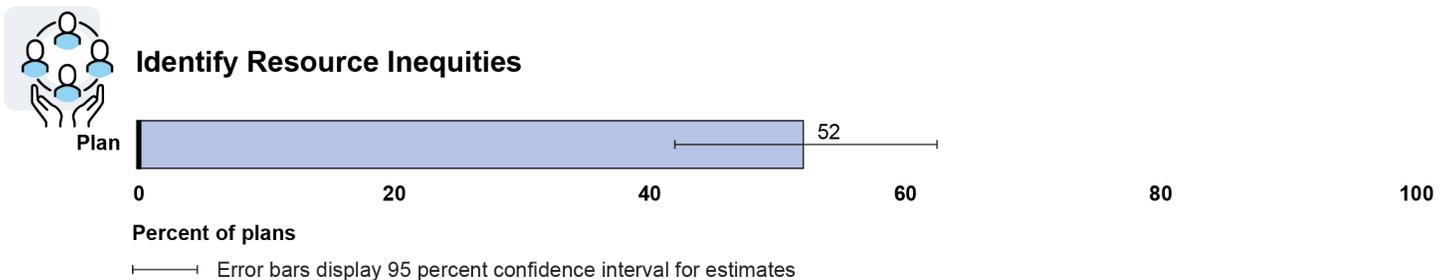
Identify Resource Inequities

According to Education’s nonbinding guidance, a review of resource inequities should help districts and schools (1) identify inequitable distribution of resources (e.g., financial) and (2) develop a plan to address any inequities uncovered.

Source: U.S. Department of Education, Frequently Asked Questions, “Impact of COVID-19 on 2021-2022 Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)” (Washington, D.C.: Feb. 2022). | GAO-24-105648

Under the ESEA, CSI plans must identify resource inequities to be addressed through the plan’s implementation. We estimate that among all CSI plans nationwide, about half (52 percent) appeared to identify resource inequities—meaning, the plans discussed resource inequities or stated that a review of resource inequities had been conducted (see fig. 9).²⁹ CSI plans varied in how they identified these inequities, including the types of resources that were evaluated and the extent to which data were used. Regarding data usage, some used data to assess whether schools or student groups had equal access to resources (e.g., qualified or culturally diverse teachers)—a practice recommended in Education’s guidance (see sidebar). For instance, one plan identified a lack of culturally relevant extra-curricular activities for certain students, such as Black and Hispanic students. To address this issue, it outlined a strategy to establish mentoring programs and clubs to increase participation among these students in extra-curricular programs. Another plan determined that certain students were not receiving the rigorous standards-based curriculum the school offered because their teachers did not adhere to the curriculum, in part due to inexperience, among other reasons. This plan outlined a strategy to address this issue that included teacher professional development and coaching.

Figure 9: Estimated Percent of Comprehensive Support and Improvement Plans that Appeared to Discuss Resource Inequities or Stated that a Review of Resource Inequities Had Been Conducted



Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. | GAO-24-105648

Notes: GAO reviewed the most recent CSI plans available as of June 2022 from a nationally generalizable sample of schools identified for CSI in the 2019-2020 school year (the most recent year available at the time of our review). Under the Elementary and Secondary Education Act of 1965, as

²⁸To maximize chance of success, Education’s guidance states that schools should focus their actions on addressing root causes that the school has influence over—such as the school’s educational environment.

²⁹The 95 percent confidence interval for this estimate is 42 to 63.

amended by the Every Student Succeeds Act (ESEA), CSI plans must identify resource inequities that are to be addressed through implementation of the plan. 20 U.S.C. § 6311(d)(1)(B)(iv). GAO assessed whether each plan discussed resource inequities or stated that a review of resource inequities had been conducted. GAO did not independently assess legal compliance with the ESEA requirements.

Other plans discussed resource inequities generally (e.g., by identifying vulnerable groups of students who faced disadvantages in their own lives, such as homelessness or poverty), but did not appear to evaluate whether school-based resources were being inequitably distributed. Plans that focus on problems that schools have limited opportunities to address may not serve as effective road maps to improve student outcomes. The ESEA states that CSI plans must identify resource inequities, which may include a review of district and school-level budgeting. However, an estimated 13 percent of plans appeared to evaluate whether district or school funding was equitably distributed.³⁰ Moreover, while Education's guidance suggests that CSI plans should consider all of a school's educational resources in their review of resource inequities, most plans we reviewed did not do so.³¹ Specifically, we estimate that 41 percent of plans addressed access to effective educators and staff, 27 percent addressed instructional time, 27 percent addressed family engagement, 12 percent addressed access to rigorous and engaging curriculum, and 3 percent addressed access to high-quality early learning programs.³² Plans that do not evaluate school-based resource inequities may not identify important ways in which the educational system is underserving some student groups or schools.

³⁰The 95 percent confidence interval for this estimate is 7 to 22. The ESEA does not explicitly require that CSI plans assess whether district or school funding is equitably distributed.

³¹To help states and districts meet the ESEA's requirement to identify resource inequities, Education's guidance states that a review of resource inequities should consider all educational resources, including all sources of funding, as well as other resources such as access to qualified, experienced, and effective educators and support staff; instructional time; access to high-quality early learning programs and interventions; access to a rigorous and engaging curriculum; and family engagement. U.S. Department of Education, *Frequently Asked Questions. Impact of COVID-19 on 2021-2022 Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)*. (Washington, D.C.: Feb. 2022).

³²The 95 percent confidence intervals for each estimate are as follows: (1) access to effective educators and staff: 31 to 51; (2) instructional time: 18 to 37; (3) family engagement: 18 to 37; (4) access to rigorous and engaging curriculum: 6 to 21; and (5) access to high-quality early learning programs: 1 to 9.

Evidence-Based Interventions

Evidence-based interventions

According to Education's nonbinding guidance, the purpose of selecting evidence-based interventions is to assure that those interventions, once implemented, are likely to actually improve student outcomes. Further, it specifies that districts and schools should, among other things, consider: (1) whether selected interventions address the school's highest priority needs; (2) the strength of the evidence supporting those interventions, including whether they have been shown to improve performance among the target population of students; (3) the local capacity to implement the intervention effectively (e.g., funding, staff skills, and stakeholder support); and (4) how to plan, prepare for, assess, and refine the implementation of the strategy.

Source: GAO review of Department of Education (Education), "School Improvement: Strategy Selection" (Washington, D.C.: Sep. 1, 2020), assessed November 21, 2023, <https://oese.ed.gov/resources/oese-technical-assistance-centers/state-support-network/resources/school-improvement-strategy-selection/>. | GAO-24-105648

Using evidence-based strategies to improve outcomes is a long-standing goal for federal programs. Under the ESEA, all CSI plans must include evidence-based interventions; the term evidence-based is defined under the ESEA.³³ There is no definitive resource that lists all interventions that meet the ESEA definition of evidence-based. Because it is not possible to estimate the percentage of CSI plans containing evidence-based interventions using existing information sources, we instead estimated (1) the percentage of plans that included at least one intervention that appeared to be aimed at improving student or other related outcomes, and (2) the percentage of plans that included at least one intervention whose effectiveness is supported by a high-quality study reviewed by Education's What Works Clearinghouse (Clearinghouse). The Clearinghouse is an online resource that evaluates the rigor of selected, publicly available studies examining the effectiveness of interventions; it is not designed to assess whether any particular intervention meets the

³³The ESEA defines evidence-based, when used with respect to interventions or improvement strategies funded using Title I school improvement funds, as an activity, strategy or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on (1) strong evidence from at least one well-designed and well-implemented experimental study; (2) moderate evidence from at least one well-designed and well-implemented quasi-experimental study; or (3) promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias. In all other instances, the definition of evidence-based also includes an activity, strategy, or intervention that demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and includes ongoing efforts to examine the effects of such activity, strategy, or intervention. 20 U.S.C. § 7801(21).

ESEA definition of evidence-based, according to Education officials.³⁴ The Clearinghouse reviews studies that use the highest quality research designs.³⁵ Eligible methodologies align with the two most rigorous tiers of allowable evidence under the ESEA: (1) strong (tier I), and (2) moderate (tier II). Other methodologies that are allowable under the ESEA are not eligible for review by the Clearinghouse.³⁶ According to Education officials, the Clearinghouse has not reviewed all studies meeting its research standards, due to resource constraints and other factors. Further, it does not include information about all interventions. Education does not consider the Clearinghouse to be a definitive resource for all interventions that meet the ESEA definition of evidence-based, and officials repeatedly cautioned about the Clearinghouse's limitations. Regarding our first assessment, and as shown in figure 10, we estimate that 86 percent of all CSI plans appeared to include one or more

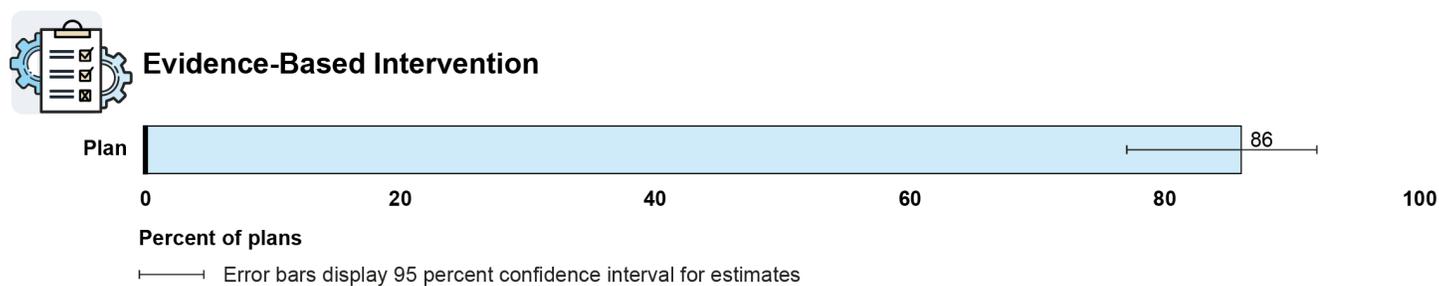
³⁴For all studies it reviews, the Clearinghouse issues evidence summaries and uses numbered tiers to classify the strength of the evidence in the studies. If the Clearinghouse reviews studies that do not suggest an intervention is effective, no evidence tier is assigned. When the Clearinghouse reviews a body of research on an intervention, and does not find any research meeting its standards, the Clearinghouse report states that it was unable to find any research meeting its design standards.

³⁵Education officials stated that a study being ineligible for review by the Clearinghouse does not imply that the interventions examined in that study do not meet ESEA evidence standards.

³⁶Studies that are eligible for review by the Clearinghouse include those based on randomized control trials, quasi-experimental designs, regression discontinuity designs, and single-case designs. These methodologies align with the two most rigorous tiers of allowable evidence under the ESEA: (1) strong (tier I), and (2) moderate (tier II). If a study meets the Clearinghouse's design standards for strong or moderate evidence but has an inadequate number of testing sites or an inadequate sample size, the Clearinghouse may classify the evidence as promising (tier III). However, studies using methodologies that align with the ESEA's definitions of tier III and tier IV evidence are not eligible for review by the Clearinghouse. We found 10 studies on the Clearinghouse website that were marked as tier III, even though the Clearinghouse does not review research that aligns with ESEA tier III. When we asked why Clearinghouse study reviews were marked "tier III," Education officials acknowledged that more clarity about the Clearinghouse's limitations would be useful and told us that they added this clarification to their website as of December 2023.

intervention, while 14 percent did not.³⁷ These latter plans sometimes mentioned general ideas for improving student outcomes, such as “structuring out-of-school time” or “data-based decision making,” but did not clearly refer to a specific intervention to help them achieve that goal.

Figure 10: Estimated Percent of Comprehensive Support and Improvement Plans that Included One or More Interventions to Improve Student or Other Related Outcomes



Source: GAO review of a nationally generalizable sample of comprehensive support and improvement (CSI) plans for schools identified for CSI in school year 2019-20. GAO (images). | GAO-24-105648

Notes: GAO reviewed the most recent CSI plans available as of June 2022 from a nationally generalizable sample of schools identified for CSI in the 2019-2020 school year (the most recent year available at the time of our review). Under the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESEA) of 1965, CSI plans must include evidence-based interventions. 20 U.S.C. § 6311(d)(1)(B)(ii). GAO assessed whether each plan appeared to include one or more intervention. GAO operationalized the term “intervention” to include specific strategies or activities that appeared to be geared toward improving student outcomes or related outcomes. GAO did not independently assess whether these interventions met the ESEA definition of evidence-based. Furthermore, GAO did not independently assess legal compliance with the ESEA requirements.

Regarding our second assessment, we estimate that about three in five CSI plans (58 percent) included at least one intervention whose effectiveness is supported by a high-quality study that the Clearinghouse has reviewed.³⁸ Some of these plans discussed the strength of evidence for the intervention, including the relevance for the target student population, and described planned steps to evaluate implementation of the intervention—a practice recommended in Education’s guidance (see sidebar). For example, a CSI plan for an urban, ethnically diverse school identified an intervention to promote student engagement; cited research

³⁷We considered a plan as including an “intervention” if it had specific strategies or activities that appeared to be geared toward improving student outcomes or other related outcomes (e.g., teacher performance). We excluded strategies or activities such as information clearinghouses, software to track student grades, and metrics for measuring student or teacher performance, as well as concepts like “professional development or “building number sense.” We did not independently assess whether these interventions met the ESEA definition of evidence-based. The 95 percent confidence interval for our estimate of the percent plans that included at least one intervention is 77 to 92 percent. The confidence interval for the percent of plans with no interventions is 8 to 23 percent.

³⁸The 95 percent confidence interval for this estimate is 48 to 68 percent.

demonstrating that the intervention increased on-task behavior in other urban, ethnically diverse schools; and delineated a strategy to monitor its implementation, which included ongoing teacher coaching.³⁹

However, we also estimate that 18 percent of CSI plans included interventions shown to be ineffective by high-quality studies that the Clearinghouse has reviewed.⁴⁰ Separately, we also found plans that included interventions which have not been shown to be effective with the specific target population of students indicated in the school's plan.⁴¹ For example, one school planned to implement a reading intervention for kindergarten students even though its effectiveness had only been substantiated for students in higher grades. Education officials noted that implementing interventions not intended for the specific student population is permissible and may be reasonable, especially if paired with an evaluation that expands the evidence base. However, Education's nonbinding guidance states that the relevance of the evidence (e.g., the population of students served) may predict how well an evidence-based intervention will work in a local context. Plans that did not include interventions proven to be effective (or successful for the intended target population) may be less likely to effect positive change for students or lead to school improvement.

Some School Administrators Reported Challenges Developing CSI Plans

In interviews with seven CSI school leaders and discussion groups with 10 officials from school districts with CSI schools, officials reported challenges developing each of the three CSI school improvement plan elements required under ESEA that were included in our review.

Needs assessments. Several district officials told us that their schools had difficulty understanding how to assess needs. For instance, two district officials shared that school leaders do not always understand how a needs assessment should be conducted. One of these district officials stated that school leaders do not always know why they should do the assessment. Two district officials also noted that a quality needs

³⁹This plan stated that teachers would be trained in the use of a specific intervention that employs varied active teaching strategies, such as project-based learning, to address the school's identified need to improve active student learning and embed high-yield instructional strategies into its instruction.

⁴⁰The 95 percent confidence interval for this estimate is 11 to 27 percent. As previously noted, the Clearinghouse only reviews existing studies that align with the two most rigorous tiers of allowable evidence under the ESEA.

⁴¹Clearinghouse intervention reports—which review a body of research into interventions—indicated that the Clearinghouse was unable to identify any existing studies investigating the efficacy of these interventions that met its research standards for the target population indicated in the sampled CSI plan.

assessment requires in-depth data analysis that can be difficult for school officials to execute. Finally, three district officials said that they found it useful to hire consultants who have expertise in assessing and prioritizing needs for action and developing plans to address those needs.

Identifying resource inequities. Two officials reported difficulty understanding how to conduct a review of resource inequities. Specifically, a district official stated that without additional guidance and support, some schools may not analyze the data needed to meaningfully assess whether resources were inequitably distributed within or across schools. Similarly, a school official stated that he did not know how to approach a review of resource inequities, and conducted a quick internet search to understand what a resource inequity was in order to complete the school's CSI plan.

Evidence-based interventions. Several district officials described this as the most challenging of the three required elements we reviewed. First, two district officials noted that the ESEA definition of evidence-based can be hard to understand, making it difficult to determine whether an intervention meets those standards. All seven of the school officials we spoke with were unaware of Education's Clearinghouse as a resource to help them do so.⁴² Two school officials said they often turned to alternative informal means of selecting interventions, including asking for word-of-mouth recommendations from colleagues or posting in informal social media groups. These groups may not include experts on evidence-based interventions. Additionally, two district officials and one school official stated that they turned to educational product vendors or paid consultants for assistance in selecting interventions. Finally, one district official stated that teachers—and even a school principal in one case—sometimes resist considering new interventions. This official shared the opinion that many school officials need help understanding why a new approach is needed as their default is to continue with the status quo.

Results from our 2019 51-state survey on state school improvement efforts align with what we heard in these interviews and discussion groups—that is, conducting needs assessments, identifying resource inequities, and selecting evidence-based interventions are common areas

⁴²The limited interviews and discussion groups we conducted with district and school officials for this report are not generalizable. However, when compared to state responses from a GAO 2019 51-state survey on state school improvement efforts, they suggest that district and school officials may not have the same level of awareness about Education's What Works Clearinghouse as do state officials. In this survey state officials from 30 states described the Clearinghouse as moderately or very helpful. GAO-21-199.

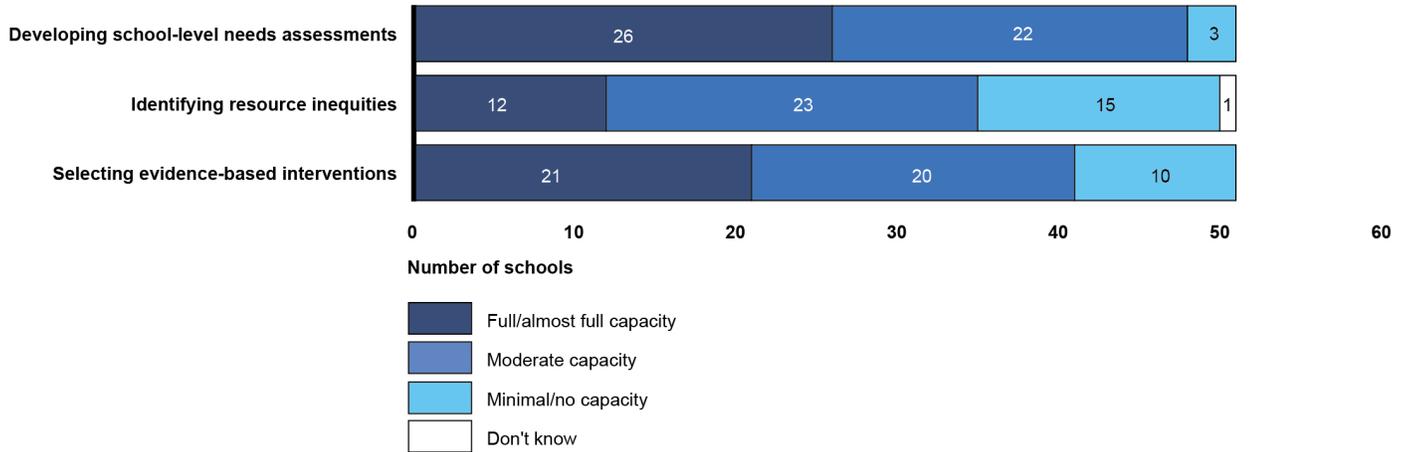
of struggle.⁴³ On the one hand, the 2019 survey found that most states reported having at least moderate capacity to assist districts with each of these school improvement planning activities. But on the other hand, we also reported that a large majority of states said that it was moderately or very challenging to support schools in conducting reviews of resource inequities (35 states) and selecting evidence-based interventions (34 states) in particular (see fig. 11).⁴⁴

⁴³Our analysis of survey of state officials from GAO, *K-12 Education: Observations on States' School Improvement Efforts*, GAO-21-199 (Washington, D.C.: Jan. 11, 2021). This web-based survey was provided to state-level school improvement officials in all 50 states plus the District of Columbia. We received responses from all 51 states.

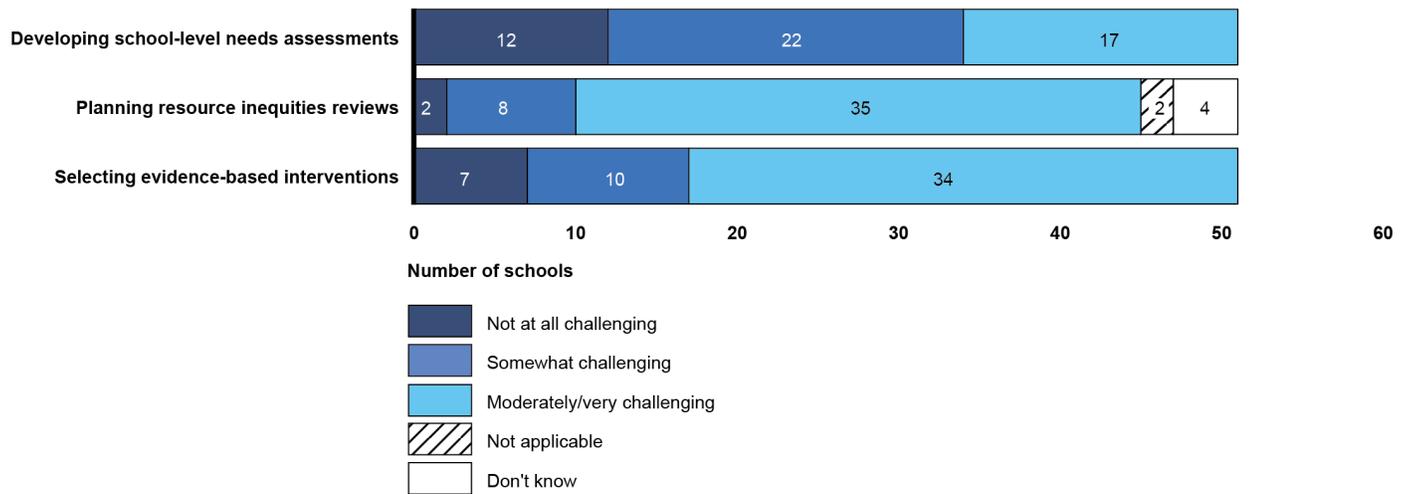
⁴⁴Education's efforts to identify and address some of these challenges are discussed later in this report.

Figure 11: States Reporting on Their Capacity to Assist Districts in Developing Elements of Improvement Plans and the Degree of Challenges Faced: Results from 2019 GAO Survey.

Capacity to assist district in aspects of school improvement planning process



Extent of challenges in supporting district in specific school improvement planning efforts



Source: GAO analysis of survey of state officials. GAO, K-12 Education: Observations on States' School Improvement Efforts, GAO-21-199 (Washington, D.C.: Jan. 11, 2021). | GAO-24-105648

Education Could Strengthen Monitoring Procedures to Assess State Compliance with ESEA Oversight Responsibilities

Education Collects a Variety of School Improvement Data but Its Utility for Monitoring Purposes Has Limitations

Education regularly collects and uses state-reported school improvement data to support its ESEA oversight and monitoring, but officials emphasized that the wide discretion afforded to states under ESEA limits the ways in which they can use these data as a compliance indicator. Data collected include (1) schools states have identified for support and improvement, (2) the reasons why, (3) schools that received school improvement funding, and (4) how much funding each school received.⁴⁵ Each year, Education reviews these data for timeliness, completeness, and accuracy. Through its review of 2019-2020 school year data, Education found a number of potential compliance issues related to how states identified schools for support and improvement. For instance, it found that several states did not report at least 5 percent of their Title I schools as CSI or report any high schools as CSI due to low graduation rates, as required under the ESEA.⁴⁶ Additionally, Education found that several states failed to identify schools for ATSI, as required. Education officials also said they have placed the Title I, Part A grants for three states on high-risk status as a result of significant noncompliance discovered during their reviews of the states' *EDFacts* data

⁴⁵Data are collected through Education's *EDFacts*. Through *EDFacts*, Education centralizes performance data supplied by states with other data, such as financial grant information, to enable better analysis and use in policy development, planning, and management.

⁴⁶Under the ESEA, CSI schools must include not fewer than the lowest-performing 5 percent of all Title I schools, as well as all public high schools failing to graduate a third or more of their students. Additionally, schools identified for CSI must also include Title I schools previously identified for ATSI that have not improved within a certain number of years as determined by the state. 20 U.S.C. § 6311(c)(4)(D)(i).

submissions.⁴⁷ Further, officials said they consider the quality of *EDFacts* data submissions in considering which states to include for routine monitoring.

However, Education officials also cautioned against using *EDFacts* data to make assumptions about non-compliance or to draw broad conclusions about states' distribution practices, due to the discretion the ESEA grants to states in distributing school improvement funds.⁴⁸ For example, states may award funds by formula, competitively, or through a hybrid method; and may make one-year or multi-year awards (and may combine funds from multiple years).

As a result, Education officials said that almost any method a state uses to allocate school improvement funding is likely to be permissible. For instance, they described one state that distributed no funding in 1 fiscal year because it was planning to combine 2 years' worth of funds and distribute them together. Additionally, officials said it would also likely be permissible for states not to fund any CSI schools in a particular year—for instance, if a state distributed funds competitively and no CSI schools qualified.⁴⁹ Education officials also stated that it would have to significantly expand the scope of its data collection to account for these issues, which would substantially increase the reporting burden on states. As such, Education officials said that determining whether states are appropriately allocating school improvement funds requires a deeper review—as Education does through its routine monitoring.

Our own review of school year 2020-21 funding data illustrates these points. For instance, six out of the 45 states reporting valid funding data for that year reported awarding all their school improvement funding to CSI schools while three states reported awarding no funding to CSI

⁴⁷Education may consider a state to be “high risk” if it determines that, among other things, the state has had a history of unsatisfactory performance, has not conformed to terms and conditions of previous awards, or has failed to report required data. If Education makes additional awards to a state on its high-risk list, special conditions and/or restrictions are included in the award.

⁴⁸Education officials said that when placing a grant on high-risk status, they outline the specific actions that a state must take in order to come into compliance and have high-risk status removed.

⁴⁹Alternatively, a state may prioritize CSI schools for funding in 1 year, and another group of schools in another year, officials stated.

schools at all.⁵⁰ Across all 45 states, two-thirds of funding (65 percent) went to CSI schools. Among the 42 states that reported allocating funding to CSI schools, the percent of CSI schools funded ranged from 23 to 100 percent. The average award amount across all states was about \$140,000. However, state award averages ranged widely—from \$13,000 to nearly \$500,000. Award amounts were also highly variable within states. For instance, in more than a third of states, the maximum award was more than ten times higher than the minimum award. In contrast, in one state, all schools received the same award, regardless of their size.

Education Has Identified Compliance Issues through Routine Monitoring, and Could Further Strengthen Its Procedures

Education has identified and required states to correct numerous deficiencies in implementing ESEA school improvement requirements. However, Education could improve its monitoring procedures by independently selecting the CSI plans to be reviewed during its monitoring sessions.

Between February 2020 and July 2023, Education monitored nine states' compliance with school improvement and other ESEA requirements through its routine consolidated performance review process.⁵¹ Education selects states for review based on a variety of risk factors, such as a state's past level of compliance with program requirements and other administrative, financial, and internal control risks.

According to Education's monitoring protocols, in each monitoring review, Education administers a state self-assessment protocol that asks states to describe how they are meeting school improvement oversight responsibilities. It also requests supporting documentation, including copies of (1) state guidance to districts, (2) state review and approval procedures, and (3) a small sample of approved improvement plans and school improvement funding applications for review. Education also

⁵⁰Due to the COVID-19 pandemic, Education did not require states to correct reporting errors or omissions for that year. According to Education officials, six out of 50 states plus the District of Columbia did not report school improvement funding data at all for the 2020-2021 reporting year.

⁵¹The consolidated performance review is a broad monitoring effort that includes Title I and other federal education programs. The consolidated performance review process is intended to: (1) encourage collaboration and cross-program coordination to improve the effectiveness of federal programs; (2) provide technical assistance to grantees on cross-cutting and program-specific issues; (3) ensure program integrity by verifying compliance with federal statutes and regulations; and (4) reduce the burden monitoring reviews can place on grantees.

administers a district self-assessment protocol and requests supporting documentation from two or three school districts.⁵²

Education officials said that their current monitoring procedures are focused on evaluating the processes, guidance, and templates that states may use to help ensure districts develop CSI plans and funding applications that meet ESEA requirements. Additionally, according to Education officials, staff discuss a state's review process and review any rubrics or guidance documents the state provides to districts and schools, as well as any support and improvement plan templates. If Education finds significant compliance or quality concerns during the review, it will require the state to take corrective action to resolve the issue.

Among the nine states for which Education issued monitoring reports between February 2020 and July 2023, Education required five to take corrective actions as a result of compliance issues with the three required elements of CSI plans GAO assessed. For instance, Education found that:

- 1) one of the nine monitored states did not require plans to be based on a needs assessment;
- 2) five states did not require plans to identify resource inequities; and
- 3) one state did not require plans to include evidence-based interventions.⁵³

Among the same nine states, Education required seven to take 19 corrective actions as a result of school improvement funding compliance issues. For example, Education found that:

- 1) one of the nine monitored states did not check for district assurances that evidence-based interventions paid for with school improvement funds met ESEA requirements as part of its monitoring protocols;
- 2) two states did not require districts to describe how they monitored schools' use of improvement funds; and

⁵²Education selects one district. According to Education officials, Education then examines state and district responses and generates additional questions in preparation of the monitoring session. During the session, Education and the state will discuss the state's implementation of ESEA requirements at which time the state may provide additional documentation. After the session, Education staff analyze all of the collected data and draft a final report on the state's performance.

⁵³Education required seven states to take a total of 27 corrective actions in response to these and other school improvement compliance issues.

-
- 3) one state did not award all of the funds set aside for school improvement to districts or receive approval to provide improvement services directly, as required.

Education officials stated that they do not review sampled plans or funding applications to assure that evidence-based interventions meet ESEA requirements because they did not believe it was within Education's role to do so. Furthermore, given the challenges inherent in determining whether a particular intervention meets ESEA standards, Education officials emphasized the importance of state flexibility to devise their own approaches to assessing compliance in this area.

However, Education does not select the CSI plans it will review, relying instead on monitored states and districts to do so. When asked why Education does not independently select these documents, officials explained that staff are primarily focused on evaluating state guidance and monitoring procedures, rather than the outcomes of states' review processes. Education officials also emphasized that states—rather than Education—have primary responsibility for assuring school and district compliance with ESEA requirements.

However, Education is responsible for assuring that states understand and fulfill their obligations under the ESEA effectively. Independently selecting the state-approved CSI plans for staff to review—rather than allowing monitored states and districts to make those selections—would help Education better ensure that it has a clear picture of how well states are fulfilling their oversight responsibility under the ESEA. And while Education officials pointed to the presence of monitoring findings as proof that its current process is sufficiently robust, our own CSI plan review found that most CSI plans did not appear to address all selected required elements. This suggests that Education may not have a complete understanding of how well states are fulfilling their oversight responsibilities under the ESEA.

Standards for internal control in the federal government call upon federal agency leaders to implement practices that effectively identify, assess, and respond to risk.⁵⁴ Updating monitoring protocols to ensure that Education's staff independently select plans for review would better position Education to fully identify and respond to the risk that states may not fully understand or fulfill their school improvement obligations under the ESEA effectively.

⁵⁴GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 10, 2014), principle 7—Identify Analyze and Respond to Risks.

Education Has Conducted Targeted Monitoring of School Improvement Requirements to Address Areas of Particular Concern

In addition to its routine monitoring, Education has conducted targeted monitoring to better understand how states have guided district and school efforts to comprehend and address certain school improvement requirements. Specifically, based in large part on findings from its routine monitoring, Education undertook a targeted monitoring initiative focused on ESEA resource equity requirements in fiscal year 2022.⁵⁵ Through this initiative, Education assessed how nine states were fulfilling the ESEA requirements to:

- 1) support school improvement efforts by periodically reviewing resource allocation in school districts with a significant number of schools identified for support and improvement, and
- 2) assure that districts with schools in CSI status were identifying resource inequities to be addressed through implementation of schools' CSI plans.

Education found that seven of nine monitored states were not ensuring that districts with CSI schools identified and addressed resource inequities through their improvement plans.⁵⁶ Additionally, Education officials stated that the submitted sample plans from these seven states did not demonstrate that the districts had a clear understanding of how to identify and address a resource inequity. In our own review of CSI plans, we estimated that nearly half (48 percent) of plans did not appear to identify resource inequities to be addressed in the plan or state that a review of resource inequities had been conducted. We also found that a number of school improvement plans identified inequities that were beyond the school's control to address, such as student homelessness or family poverty.

As a result of its findings, Education required the seven states to address identified deficiencies and also released a Dear Colleague Letter on Title I Resource Equity updating states on the lessons learned from this targeted monitoring initiative. The Letter included four recommendations to states on how to help districts and schools both identify and address resource inequities, examples on how to implement the

⁵⁵This targeted monitoring initiative involved a specific self-assessment protocol that was limited to two resource equity requirements under ESEA.

⁵⁶These nine states were different than the nine states Education monitored between February 2020 and July 2023 as part of its consolidated monitoring except for Kentucky, which was included in both reviews.

recommendations, and links to a number of Education resources.⁵⁷

Through its targeted monitoring initiative, Education identified weaknesses in state understanding of these ESEA requirements, helped monitored states to correct deficiencies, and may ultimately improve the quality of state oversight for the future.

Conclusions

Effective monitoring of federal programs under Education’s purview is critical to its ability to ensure that federal funds are used for the purposes intended and programs are achieving goals and objectives. Under the ESEA, states are responsible for ensuring districts and schools comply with ESEA requirements related to school support and improvement activities. Education has taken steps to help ensure that states comply with ESEA requirements, such as by reviewing state-reported *EDFacts* data to identify possible compliance issues, conducting regular consolidated monitoring in several states each year, and through its recent targeted monitoring initiative. Education relies most heavily on its consolidated monitoring processes to ensure that states are fulfilling their ESEA requirements, and Education has identified compliance issues through that monitoring. However, Education could improve the quality of its monitoring procedures by assuring that its own staff—rather than monitored states—independently select plans for review. Doing so would help Education better ensure that it is identifying and responding to compliance risks through this key part of its monitoring strategy.

Recommendation for Executive Action

The Secretary of Education should update monitoring protocols to ensure that monitoring staff independently select support and improvement plans for review. (Recommendation 1)

Agency Comments

We provided a draft of this report to Education for review and comment.

In its written comments, which are summarized below and reproduced in appendix I, Education officials acknowledged that there is room for improved local implementation of CSI plans and school improvement funding applications under ESEA. Further, Education officials generally agreed with our recommendation that Education should update

⁵⁷For example, Education recommended that states provide guidance or technical assistance to districts and schools on identifying specific, measurable resource inequities. It suggested that states provide a recommended list of resources to help schools identify resource inequities within schools, and districts identify resource inequities across schools within a district. Education also recommended that states develop a list of data sources that a district may use to inform its needs assessment and school improvement plans. The Letter includes a total of nine recommendations on completing resource allocation reviews. Department of Education, *Dear Colleague Letter on Title I Resource Equity*, (Washington, D.C: July 23, 2023), accessed Aug. 29, 2023, <https://oese.ed.gov/files/2023/07/DCL-Title-I-Resource-Equity-for-posting.pdf>.

monitoring protocols to ensure that staff independently select CSI plans and school improvement funding applications for review. Education officials also noted that Education only reviews funding applications for monitored school districts, and that it independently selects one of the two districts monitored in each state. Given that one of the two funding applications Education reviews is from an independently selected district, we updated our recommendation to focus solely on assuring that staff independently select CSI plans for review. Education officials stated that they will begin doing so in spring 2024.

Education also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Education. In addition, the report is available at no charge on the GAO website at <https://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. Contact points for our Office 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.



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

List of Committees

The Honorable Tammy Baldwin
Chair

The Honorable Shelley Moore Capito
Ranking Member

Subcommittee on Labor, Health and Human Services, Education, and
Related Agencies

Committee on Appropriations
United States Senate

The Honorable Robert Aderholt
Chair

The Honorable Rosa DeLauro
Ranking Member

Subcommittee on Labor, Health and Human Services, Education
Committee on Appropriations

House of Representatives

Appendix I: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

January 11, 2024

Jacqueline M. Nowicki
Director
Education, Workforce, and Income Security Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548
nowickij@gao.gov

Dear Director Nowicki,

Thank you for providing the Department of Education (Department) the opportunity to review and comment on the Government Accountability Office (GAO) draft report: “Education Could Enhance Oversight of School Improvement Activities” (GAO-24-105648). The Department generally agrees with GAO’s recommendation, with the caveats described below. We also outline several technical comments to ensure the report is accurate and consistent with statutory requirements.

Recommendation 1: *The Secretary of Education should update monitoring protocols to ensure that monitoring staff independently select support and improvement plans and improvement funding applications for review.*

Response: The Department generally agrees that school and local educational agency (LEA) implementation of comprehensive support and improvement (CSI) plans and school improvement funding applications under section 1003 of the Elementary and Secondary Education Act of 1965 (ESEA) could be improved to ensure compliance with all ESEA requirements. This has been evident through the Department’s monitoring process. Although the Department believes that its monitoring has adequately identified areas of non-compliance, it will begin selecting the CSI plans that are submitted as part of consolidated monitoring beginning in spring 2024.

We note, however, that our consolidated monitoring process already ensures that the Department staff have selected an ESEA section 1003 school improvement funding application from an LEA. The ESEA requires each state to allocate section 1003 funds to LEAs to support school improvement efforts in identified schools. These funds are not awarded directly to schools. As such, the application requirements in ESEA section 1003(e) are for LEAs. As part of consolidated monitoring, the Department independently selects one LEA for monitoring (typically the largest or one of the top five largest LEAs). We then work with the State to select a second LEA that receives funds in the programs included in consolidated monitoring and that has at least one school identified for improvement. The Department reviews the ESEA section 1003 school improvement funding applications from each LEA that is reviewed for Title I, Part A. As a result, the process already ensures that the Department is selecting one LEA 1003 application to review.

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

**Appendix I: Comments from the Department of
Education**

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Thus, we suggest that GAO revise Recommendation 1 to read as follows: *The Secretary of Education should update monitoring protocols to ensure that monitoring staff independently select support and improvement plans for review.* This revision is in alignment with GAO's analysis of the status of CSI plans.

Additionally, we are providing technical comments as an enclosure to this letter.

We appreciate the opportunity to comment on the draft report and would be glad to work with your office as you finalize the report.

Sincerely,

MARK
WASHINGTON

Digitally signed by MARK
WASHINGTON
Date: 2024.01.10
17:12:51 -0500'

Mark Washington
Deputy Assistant Secretary
Office of Elementary and Secondary Education

ENCLOSURE

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov

Staff Acknowledgments

In addition to the contact named above, Ellen Phelps Ranen (Assistant Director), Cheryl Jones (Analyst-in-Charge), Hannah Bisbing, Gretel Clarke, Christina Cuthbertson, Alison Grantham, and Paulina Rowe made key contributions to this report. Also contributing to this report were Carl Barden, Meagan Baucom, Charlotte Cable, Rachel Chamberlin, Sherwin Chapman, Elizabeth Calderon, Mark Glickman, Jill Lacey, John Mingus, Monica Savoy, Meg Sommerfeld, Curtia Taylor, and Adam Wendel.

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