

**Entry and Exit Guidance for States in School Year 2020-2021:
Considering the Options for Identification Entry and Exit for Schools**

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

- Comprehensive Support and Improvement (CSI) schools (at least every three years): schools in the bottom 5% of Title I schools for all students, schools with graduation rates lower than 67%, or Additional Targeted Support and Improvement schools that do not exit within a state-determined number of years;
- Targeted Support and Improvement (TSI) schools (annually): schools with “consistently underperforming” subgroups of students, as defined by the state; and
- Additional Targeted Support and Improvement (ATSI) schools: schools with one or more subgroups that, on their own, perform at or below the threshold(s) established for the lowest-performing schools in the state.

Schools identified for CSI, TSI, or ATSI must implement a school improvement plan focusing on areas of need; these schools also are eligible for federal and state resources to support improvement efforts. To incentivize schools, states must establish rigorous, yet attainable, criteria for schools to exit CSI status within four years or less. ATSI exit requirements are state defined but do not have a statutorily required timeframe. TSI exit requirements are not required, but if included are locally defined. States also must take additional action for CSI schools that fail to meet exit criteria and identify ATSI schools that fail to meet exit criteria as CSI schools. Because states have limited resources, appropriate identification entry and exit criteria are essential for identifying the right schools for support and, in turn, monitoring the implementation of state and local interventions.

Accountability systems should be designed to differentiate schools having widely varying needs. If there is insufficient data to justify why schools are identified, or the accountability system does not effectively differentiate the lowest-performing schools, valuable resources may not be going to the schools most in need. Furthermore, if schools are exited too soon, capacity-building and instructional-improvement efforts may not take root and, consequently, these schools risk being identified yet again. Pandemic-related closures can exacerbate these risks by reducing the quality and quantity of information that states require for identifying and exiting schools.

COVID-19 disruptions will substantially complicate these processes for many states. The rapid and largely unforeseen spread of this virus in the U.S. required an immediate response from states and districts, and altered the status quo in many ways: (a) a truncated school year (SY) in 2019-2020, which eliminated large-scale assessments used to inform accountability decisions; (b) shifted school priorities

for spring 2020; and (c) uncertainties about re-opening in fall 2020 as well as the SY 2020-2021 student experience.

Many states are considering revising the procedures for identifying and exiting schools in fall 2021, or postponing these decisions to fall 2022. In this paper, we discuss ways to address entry and exit from CSI and ATSI status in SY 2020-2021, and the corresponding implications. We do not advocate one approach over another. Rather, the most appropriate approach is state-specific and depends on (a) the purpose of identification and the state's role in supporting school improvement; (b) the procedures and timeline for determining entry and exit status; and (c) the importance of maintaining the legacy system. In the sections that follow, we discuss

- waivers and amendments
- identification options in a time of missing data due to COVID-19 disruptions
- state approaches for identifying and exiting schools
- considerations for identifying and exiting schools in SY 2020-2021
- implementation recommendations for making school determinations¹ in SY 2020-20201 and beyond

Waivers and Amendments

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

- assessment requirements [section 1111(b)(2)] for SY 2019-2020 in reading/language arts, mathematics, science, and English language proficiency;
- accountability and school identification requirements in sections 1111(c)(4) and 1111(d)(2)(C)-(D) based on SY 2019-2020 data, including school identification for CSI, TSI, and ATSI schools in SY 2020-2021 based on data from SY 2019-2020.

At this time, ED is not considering inviting waivers for SY 2020-2021. Rather, it expects states will submit requests for one-year updates that are likely to be needed due to circumstances caused by COVID-19 to relevant sections of ESEA consolidated state plans (e.g., long-term goals, indicators, school-identification methodologies, or timeline changes). We anticipate that the U.S. Department of Education will work closely with states to make adjustments to their plans through a streamlined process. Amendments are intended to address longer-term changes to the system and will require a more in-depth revision process to ESEA consolidated state plans. Below, we provide a brief description of waivers and amendments for clarification.

Table 1. Definitions of Waivers and Amendments.

Term	Description
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¹ For the purposes of this paper, school determinations refer to the identification and exit of schools for the following designations: (a) Comprehensive Support and Improvement, (b) Additional Targeted Support and Improvement, and (c) Targeted Support and Improvement.

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

Exploring School Determinations in Light of Missing Data

Due to COVID-19 closures, there are many missing data elements that will have implications on school determinations in SY 2020-2021. States wishing to revise their procedures for identifying and exiting schools face three formidable challenges, each of which affects the validity, reliability, and fairness of their decisions: how to (a) address missing spring 2020 data, (b) evaluate the quality and appropriateness of data collected in SY 2020-2021 and the prior years for making inferences about schools in spring 2021, and (c) assess within-year and across-year comparability of accountability system indicators and school ratings.

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

States will need to consider whether they will be implementing one of the following types of systems (see D’Brot, Landl, Domaleski & Brandt, in press):

² See Section 8401 for more information on waiver requests (<https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/>).

³ See ED’s most recent “Dear colleague letter” from October of 2019 (<https://oese.ed.gov/files/2020/02/csso-letter.pdf>), which discusses amendments.

- A legacy accountability system: A system that was in place during SY 2019-2020;
- A new or revised accountability system: A system that introduces new goals, or changes the way existing goals are defined and prioritized through indicators, decision rules, or composite indices;
- A transitional accountability system: A system that deviates from the intended system design, where SY 2020-2021 is a transitional year before fully implementing the legacy or revised accountability system in SY 2021-2022.

Regardless of which option a state selects, all states should review their existing entry and exit criteria, deliberatively consider their options, and determine which option is best given the available evidence. We present options in Table 2 based on whether states can identify and exit schools in SY 2020-2021 or are considering pursuing postponing school determination in SY 2020-2021.

Table 2. Entry and Exit Options for SY 2020-2021.

Identifying and Exiting Schools in SY 2020-2021	Pursuing Postponing Identification and Exit in SY 2020-2021
<ul style="list-style-type: none"> • Implementing a Legacy System: A state maintains its legacy system and proceeds with “business as usual” in SY 2020-2021. The state will need to validate⁴ that indicators and the overall system are sufficiently comparable within and across years. This might include the consistency and stability of trends, the ability to differentiate schools sufficiently, or ensuring that school determinations are defensible. States should ensure that all statutory requirements can be met. • Implementing a Transitional System: A state is unable to implement one or more elements of its legacy system due to missing or incomplete data, or other factors that require minor modifications to SY 2020-2021 calculations or business rules. Such modifications should maintain the intended interpretation and use of results (e.g., calculating indicator scores based on 2 rather than 3 year averages; calculating growth in the absence of 2019-2020 data). The state should use (a) historical data to model the likely impact prior to implementation and (b) data from SY 2020-2021 to confirm that intended interpretations hold and results are appropriate to support entry and exit decisions. Methodologies for making school determinations revert back to the original design in SY 2021-2022. Deviations for a single year will require states to consider processes for a one-year amendment. States should ensure that all statutory requirements can be met. 	<ul style="list-style-type: none"> • Implementing a Legacy System: A state cannot fully implement its original accountability system in SY 2020-2021 due to validity concerns (e.g., insufficient comparability across years, missing indicator data). Although the state may be able to report some results, it may have to pursue postponing entry and exit decisions for accountability purposes. The state should address any validity concerns for future determinations using data from spring 2020 and prior years. It is expected a state would resume identifying and exiting schools in SY 2021-2022, with no changes to the system. Any deviations from statutory requirements in SY 2020-2021 will require the submission of a waiver request. • Implementing a Transitional or Revised System: The state plans to revise its system and pursue postponing school determinations in SY 2020-21. Due to likely substantive changes to an

⁴ Please see D’Brot, Landl, Domaleski, and Brandt (in press) for recommendations on validation approaches for accountability systems in SY 2020-2021.

<ul style="list-style-type: none"> Implementing a Revised System: The state chooses to significantly change its accountability system and make school determinations in SY 2020-2021. Concurrently, the state may need to make exit decisions using improvement goals defined within the legacy system. The next round of school determinations (which may be 2020-2021 depending on the state’s timeline for identification) may occur with a new system. The state will need to validate that exit decisions are defensible (based on the consistency and stability of trends, the ability to differentiate schools sufficiently, or ensuring improvement expectations are still relevant). Long-term changes under a revised system will require states to consider processes for submitting an amendment. States should ensure that all statutory requirements can be met. 	<p>accountability system, the state will need to consider the necessary processes to submit an amendment to their ESEA consolidated state plans. The state will need to validate that entry and exit decisions are defensible using a newly design system. It would be valuable to corroborate interpretations using other related process or input data. Any deviations from statutory requirements in SY 2020-2021 will likely require the submission of a waiver request.</p>
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Table 2 presents possible scenarios depending on SY 2020-2021 decisions. We now turn to typical approaches for identifying and exiting schools, after which we present steps that states can implement to make identification and exit determinations in 2020-2021 and beyond.

Typical Approaches for Identifying and Exiting Schools

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

While states can identify additional categories of support, our discussion is limited to CSI, TSI, and ATSI schools. CSI schools typically are identified by the performance of all students in a school, whereas TSI and ATSI schools are identified on the basis of student-subgroup performance. CSI and ATSI decisions are based on the state’s system for Annual Meaningful Differentiation (AMD). The AMD comprises the indicators specified in statute, which include the following indicators: (a) an achievement indicator, (b) another academic indicator, (c) an English Language Learner progress indicator, (d) an adjusted cohort graduation rate indicator, and (e) a school quality/student success indicator. Table 3 provides a brief definition of these schools and their exit criteria.

Table 3. Definitions of CSI, TSI, and ATSI Schools (Lyons, D’Brot, Landl, 2017).

School Designation	Identification Criteria	Exit Criteria
Comprehensive Support and Improvement	Based on the state’s system of Annual Meaningful Differentiation (AMD), CSI requirements are:	Exit criteria specify that schools no longer meet the CSI identification criteria and ensure continued progress to improve academic and

	<ul style="list-style-type: none"> Title I schools that fall below not less than the lowest-performing 5% of all schools in the state; a high school that fails to graduate one-third or more of their students; ATSI schools that have not satisfied exit criteria within a state-determined number of years and cascade into CSI status. 	school success. States can specify additional exit criteria beyond those stated in statute.
Targeted Support and Improvement	<p>TSI schools are those with consistently underperforming subgroups. States have the authority to define what consistent underperformance means for subgroups. TSI notification requirements are:</p> <ul style="list-style-type: none"> States notify local educational agencies (LEAs) that serve schools having one or more subgroups demonstrating consistent underperformance. LEAs, in turn, notify these schools of this. 	Exit criteria are not required but can be defined locally, and LEAs can determine whether more rigorous intervention is needed.
Additional Targeted Support and Improvement	Based on the state’s system of AMD, ATSI schools are identified based on any student subgroup that, on its own, would lead to CSI identification.	Exit criteria mirror those of CSI schools for identified subgroups.

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

CSI Approaches to Identification

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

CSI Identification Cycle. Once identified, a CSI school maintains its CSI status for 1, 2 and 3 years. Generally most states identify schools every three years, but a few do it more frequently (i.e., exit and enter CSI status annually or very two years).

Number of Prior Years of Data Considered. States use 1-3 years of prior data when identifying CSI, ATSI, or TSI schools: Thirty states use 1 year of data, two use 2 years, and 19 use 3 years. The calculation of specific indicators provides another example of variability among states regarding their reliance on prior data. For instance, one state uses 3 years of consecutive data to calculate proficiency and growth indicators, but only 1 year to calculate its School Quality and Student Success indicator.

Using Graduation Rate to Identify CSI High Schools. States rely on different types of graduation rates to identify low-performing high schools. Thirty-seven states use the adjusted 4-year cohort graduation rate for this purpose, one state uses a 5-year rate, three states use a 6-year rate, and at least 10 states use a weighted combination of 4-, 5-, 6-, and 7-year cohort rates. Almost all states set the threshold at 67%, with only four setting it higher. COVID-related data loss will need to be considered as states examine graduation cohorts and whether graduation rate data for accountability are lagged.

ATSI Approaches to Identification

ATSI Designations. Some states identify ATSI schools from the pool of non-CSI schools and other states select ATSI from the pool of TSI schools. States vary in the number of years that ATSI schools must demonstrate improvement before moving to CSI status: While 33 states require ATSI to improve within 3 years, 10 states allow 4 years, one state allows 5 years, and four states allow 6 years.

TSI Designations. States apply different criteria for identifying TSI schools compared with ATSI and CSI identifications. Examples include the use of different index thresholds, different cut-points, and different selection criteria. Index thresholds refer to specific point values that are associated with a criterion score (i.e., composite index score) assigned to schools in a state's system. Cut points refer to a normative threshold to determine school identification (seven states use lowest 10%, one state uses lowest 25%, two states use lowest 1%). Selection criteria refers to basing school identification on a subset of performance indicators, such as when performance or the combination of proficiency and other indicators is below a specific threshold (selection criteria are used in rule-based or decision-based systems). Additionally, states set thresholds for TSI differently to better align with their theories of action for supporting schools. For example, if a state is interested in narrowly focusing its subgroup supports, it may design its system so that ATSI schools are identified from a small pool of TSI schools using more stringent thresholds. In other cases, a state may establish thresholds and procedures that identify a large number of schools for TSI and ATSI, reflecting a different theory of action.

TSI Approaches to Identification

TSI Identification Criteria. Statute requires that states identify TSI schools annually. However, states vary in the number of years of prior data they use for making school determinations (although most use 2-3 years of data). As a reminder, states are required to notify LEAs if they serve a school identified for TSI.

Exit Criteria and Identification Cycles

CSI and ATSI Exit Criteria. As a reminder, we do not discuss exit criteria for TSI schools because LEAs are responsible for supporting their improvement plans and processes. The CSI exit criteria for 14 states, and the ATSI exit criteria for 15, focus on meeting or exceeding the criteria that led to initial identification. For example, a school that had fallen below the 5% threshold can exit when the school

both improves and exceeds the 5% threshold *at the time of identification*. The remaining 37 states include additional exiting criteria, which vary in complexity. Examples include:

- demonstrating improvement for 2 or more years;
- demonstrating faithful implementation of the school improvement plan;
- achieving a performance expectation exceeding the initial selection criteria (e.g., requiring the school to achieve a “C” grade or target index value for consecutive years); and
- reducing achievement gaps (e.g., matching or exceeding a target of 3% reduction).

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

Considerations for Identifying and Exiting Schools in SY 2020-2021 and Beyond

We suggest four steps for states to consider when evaluating options for identifying and exiting schools:

1. Identify key issues based on whether a state can support school determinations in SY 2020-2021.
2. Determine the evidence necessary to support the corresponding policy, technical, and impact claims.
3. Determine whether an amendment or waiver is necessary based on whether states make substantive changes to the system, one-year changes to the system, or statutory requirements cannot be met.
4. Establish a plan and document the rationale for implementing the plan in SYs 2020-2021 and 2021-2022.

Table 4 provides relevant considerations for SY 2020-2021 based on when entry and exit decisions are made. The two decisions’ timing, deliberated jointly, entail a logical grouping of issues for states to consider. These issues are presented below the table, with a summary .

Table 4. Considerations Based on the Timing of Entry and Exit Decisions.

	Entry Decisions Occur Annually	Entry Decisions Occur Other Than Annually
Exit Occurs Annually	If both entry and exit decisions are made annually, pandemic-related closures in SY 2019-2020 will significantly affect both school improvement efforts and the data needed to make these decisions.	If entry decisions are slated for SY 2020-2021, and data are missing or inconsistent, the advisability of making these decisions will need to be revisited. Annual exit decisions will need to be revisited and validated in light of pandemic-related closures.
Exit Occurs Other Than Annually	Pandemic-related closures will have a definite impact on entry decisions, but may only affect exit decisions if planned for SY 2020-2021. If multi-year data are used for entry or exit decisions, it will be important to determine whether these decisions are	If entry and exit decisions were planned for SY 2020-2021, it will be important to determine whether these decisions are defensible because of the absence of multi-year evidence and multi-year improvement efforts. If school determinations are

	Entry Decisions Occur Annually	Entry Decisions Occur Other Than Annually
	defensible because of the absence of multi-year data. States will need to determine if they will need to revise the system or determine how ESEA statutory requirements can be met.	indefensible, it may be necessary wait until sufficient data are available to interpret school improvement efforts and gather evidence of capacity building and instructional change

Based on the conditions listed in Table 4, states will need to carefully examine whether they can meet ESEA statutory requirements in SY 2020-2021. If determinations in SY 2020-2021 are indefensible, states may need to request waivers if they wish to pursue postponing exit and entry decisions until SY 2021-2022. Furthermore, states will need to determine if substantive changes for the system are needed, which would require an amendment. Each cell in Table 4 requires states to consider three major issues:

- use of multiple years of data: If multiple years of data are used, states should assess the impact of missing data on multi-year averages in calculations and performance interpretations. States will need to determine if data elements, indicators, and system claims can still be substantiated. (We discuss these claims in the next section.)
- breakdowns in school improvement efforts: Schools, districts, and states could not implement school and instructional-improvement efforts for the entire SY 2019-2020, due to pandemic-related closures. The best types of supplemental and contextual data will need to be identified—while adhering to Family Educational Rights and Privacy Act requirements—to help determine whether improvement efforts are effective, sustainable, and lasting during this time of school closures and beyond.
- justified interpretations for entry and exit decisions: Entry and exit decisions specify minimum improvement expectations based on a relatively constrained set of accountability data. Because those data are not available, states will need to confirm whether there are sufficient data elements from the accountability system to make high-stakes determinations. If valid interpretations cannot be in SY 2020-2021, states should consider leveraging additional data to contextualize how improvement efforts carry into SY 2021-2022. That is, can improvement efforts be corroborated with other available data?

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

We offer four evaluation criteria for determining if it is appropriate to make these determinations in SY 2020-2021 (Domaleski, Boyer, & Evans, in press; also see D’Brot, Landl, Domaleski, & Brandt, in press). Each criterion affects the degree to which data elements or indicators will impact entry and exit decisions and should be applied to the full system (because statute requires the system of AMD be used for entry and exit decisions). Therefore, the claims associated with the individual indicators *and* the overall system can still be substantiated. These criteria are:

- completeness: Are there missing data elements? Do the data capture the full breadth and depth expected prior to COVID-19 disruptions? While the criterion for completeness is rarely 100%, it

is more appropriate to evaluate completeness as the deviation from pre-pandemic standards. Checks for completeness should include multiple disaggregations (e.g., by school, student group, program).

- consistency: Were data properties used for entry and exit criteria altered? Specifically, did COVID-19 disruptions change how data are defined, calculated, or collected? This will affect both the individual metrics (e.g., although graduation data were not waived, the availability of 4-, 5-, and 6-year adjusted cohort graduation rates based on cohort assignment will be impacted, the award of course grades results under a shortened school year) and how they are aggregated (e.g., graduation rates, grade point averages).
- impact: What is the impact of changes to the data on performance interpretations? These changes could be associated with individual data elements, indicators, or the overall system. Is it likely that data values (e.g., performance, distribution of data, ranges) will change substantially? Do values change based on other circumstances, even if the elements are complete and calculated based on the same procedures? This will inform data reporting.
- practicality: Is it reasonable to collect and report the data used for entry and exit criteria? Will it cause undue burden on, or deflect from, higher priorities? For example, would (a) new data collections and the associated policies be too difficult to implement within a single year or (b) they detract from attention on restarting instruction or reopening schools? If the data could be misunderstood, misinterpreted, or misused, it may be necessary to withhold these data from collection or reporting.

These criteria highlight the role of individual data elements when making comparisons across indicators and in the system of annual meaningful differentiation (i.e., index-based systems or decision rules). School determinations rely on the ability of the system to support valid comparisons across schools and over time. These comparisons have the most stringent requirements using the four criteria above. In the next section, we discuss the constraints associated with entry and exit decisions, along with recommendations for implementation.

Implementation Recommendations for Identifying and Exiting Schools

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

- policy claims: The identified schools align with the system’s theory of action. A school determination theory of action may include that (a) identified schools have subgroups most in need of support, (b) identification captures schools as intended, or (c) identification supports subgroup-specific objectives.
- technical claims: Entry and exit decisions reflect meaningful differentiation within and across school classifications, and improvements in accountability data reflect sufficient progress to warrant removal of support.
- impact claim: The process of identifying schools causes districts and schools to deliberately explore their indicator results and the corresponding implications for continuous-improvement efforts.

It will be difficult to substantiate policy, technical, and impact claims in the face of such COVID-19 disruptions as shortened school calendars, reduced school-improvement interventions, and missing data that would have been used for validation purposes. Thus, it is important to extend these claims to use cases, which pertain to describing a school’s performance, evaluating trends on indicators, flagging schools for early indications of poor performance, and identifying schools for entry and exit. Specifically, states will need to determine if COVID-19 disruptions have adversely affected the evidence required (see D’Brot, et al, in press). States will need to answer two principal questions:

- Does the process for identifying CSI and ATSI schools target the schools most in need of support?
- Does the improvement in accountability data warrant removal of support?

By collecting sufficient evidence and ensuring that evidence supports claims for identification, states will be better equipped to determine whether they need to pursue postponing decisions to SY 2021-2022 through a waiver or revising determination processes through an amendment. Table 5 outlines the options available to states for their accountability systems, the evidence needed to support entry and exit determinations, the corresponding implications for these determinations, and suggested next steps.

Table 5. School Determination Options and Recommended Next Steps

	Options for SY 2020-2021		
	Implement legacy system	Implement new or revised system	Implement a transitional system
Needed Evidence	When compared with the legacy system: <ul style="list-style-type: none"> • Indicator data support valid and reliable results. • Measures can be compared and differentiated appropriately. • Empirical results promote valid, fair, and reliable school ratings. • Entry and exit processes reflect meaningful differentiation and improvement. 	When evaluated against revised state priorities or goals: <ul style="list-style-type: none"> • Indicator data support valid and reliable results. • Measures can be compared and differentiated appropriately. • Empirical results promote valid, fair, and reliable school ratings. • Entry and exit processes reflect meaningful differentiation and improvement, and are corroborated by historical trend data. 	When evaluated against legacy system or revised state priorities: <ul style="list-style-type: none"> • Indicator data support valid and reliable results, but do not reflect the full system’s design. • Empirical results promote valid, fair, and reliable school ratings, but fall short of the design goals. • Entry and exit processes will not be comparable to next year’s school performance due to a transitional system being in place.
Implications for Entry and Exit	<ul style="list-style-type: none"> • Identify schools for entry or exit if claims can be substantiated. • These claims will need evidence 	<ul style="list-style-type: none"> • Identify schools for entry or exit if claims can be substantiated that support revised state priorities. 	<ul style="list-style-type: none"> • Explore possibility of postponing school determinations to SY 2021-2022, unless a slightly modified

	supporting comparability, trend comparisons, and the defensibility of high-stakes decisions.	<ul style="list-style-type: none"> Historical data substantiate claims that the lowest-performing schools or subgroups are identified. 	<p>system can support all necessary claims for entry and exit.</p> <ul style="list-style-type: none"> Collect and examine data to confirm entry and exit decisions in future years
Next Steps	<ul style="list-style-type: none"> Collect and organize documentation supporting the rationale to implement in SY 2020-2021. Proceed cautiously and establish a communications plan to inform stakeholders. 	<ul style="list-style-type: none"> Submit an amendment reflecting system changes. Collect and organize documentation supporting the rationale for SY 2020-2021 implementation. 	<ul style="list-style-type: none"> Submit an amendment or waiver to pursue the possibility of postponing school determinations for CSI, TSI, and ATSI schools in SY 2020-2021, or collect and organize documentation supporting the rationale for SY 2020-2021 implementation. If waivers or amendments are proposed, collect and organize documentation supporting the rationale for SY 2021-2022 implementation.

While the options in Table 5 are not exhaustive, they should be sufficient for states as they consider next steps for entering SY 2020-2021.

Conclusion

COVID-19 disruptions prompted schools—particularly those having higher proportions of traditionally underserved subgroups—to shift priorities beginning in early spring 2020. Resources previously devoted to academics were instead used for providing meals and technology to facilitate remote instruction. The impact of school closures on performance is influenced by many factors. Thus, status quo procedures and criteria may not be appropriate, at least for SY 2019-2020. States will need to be substantiate that the revised or supplemental data and processes used support valid determinations about which schools are low- or under-performing or are no longer in need of federal support. Further, because 2020 summative assessment data are not available for making accountability calculations, temporary modifications may be required that will affect school determinations.

Furthermore, schools previously identified for support were unable to fully implement improvement plans because of early school closures, arguably resulting in lost progress that otherwise would have been achieved. If existing criteria for entry and exit are applied in SY 2020-2021, some CSI and ATSI schools may be prematurely exited, or not exited but reclassified, leading to the inappropriate or unnecessary delivery of resources.

Both states and districts are developing plans for re-opening schools in SY 2020-2021, which has major implications for all schools, but particularly for the lowest performing. Re-opening plans will affect school attendance schedules, course schedules, remote learning practices, access to technology, high school course offerings, out-of-school programming, and extracurricular activities. Such factors can significantly influence student attendance; student exposure to high-quality curriculum, instruction, and assessment; student engagement; and achievement—in ways that call into question the appropriateness of extant criteria for entry and exit.

This paper provides a number of considerations, criteria, and recommendations that, we hope, will help states determine how they should make school determinations in SY 2020-2021 or if waivers or amendments are warranted. We offer the three recommendations below that can help states evaluate their claims and collect evidence related to the system's data elements, indicators, and criteria for entry and exit:

- If states plan to implement their legacy system, they should collect sufficient evidence that high-stakes claims can be substantiated. Move forward with entry and exit decisions in SY 2020-2021, but proceed cautiously.
- If states plan to implement a revised system, they should collect sufficient evidence that high-stakes claims aligned to new state goals or priorities can be substantiated. Move forward with entry and exit decisions in SY 2020-2021, but proceed cautiously with any necessary changes to the system.
- If states plan to implement a transitional system because there are too many challenges to implement a fully realized legacy or revised system, it will be difficult to justify either entry or exiting determinations. This difficulty arises from the stringency of claims associated with CSI and ATSI determinations, such as meaningful differentiation, making high stakes determinations, comparability, maintaining trends over time, and the provision of resources. If appropriate, consider the necessary waivers to pursue the possibility of postponing determinations and collect data informing entry and exit decisions for SY 2021-2022.

We conclude with a statement from CCSSO's *Outlook for Accountability* (D'Brot , et. al., in press), which addresses the tension between the ability to calculate results and the potential misuse or misinterpretation of these results.

[E]ven if a state has a high level of confidence in the data and has not modified their system, it will be difficult to substantiate claims that school improvement efforts were sufficiently implemented and had taken root throughout SY 2019-2020 and during the start of SY 2020-2021. Therefore, the availability of and confidence in the data are necessary, but insufficient conditions to attribute changes in performance to specific improvement initiatives. Stated another way, disentangling 'pandemic effects' from other source of influence on school

performance will be challenging and will make it difficult to support high-stake decisions like entry/exit from ESSA school designations. (p. 16)

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

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