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The Rapid Increase of School Accountability during the Pandemic

An Essay for the Learning Curve by Josh Bleiberg

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The worsening of student outcomes during the pandemic has had unanticipated effects on states' school accountability systems. The Every Student Succeeds Act (ESSA) requires states to designate schools with the worst student outcomes for improvement activities. States designated 31 percent more schools to receive intensive supports after the pandemic, and the number of schools designated for improvement will continue to rise unless ESSA and state accountability systems change.

ESSA replaced No Child Left Behind (NCLB) in 2015 and was designed to reduce the scope of school accountability. NCLB set high achievement targets that led to untenably large numbers of schools being targeted for improvement, and ESSA replaced it with state-designed systems that identified schools for improvement in three-year cycles. The first ESSA improvement cycle began in 2017–18 and was scheduled to end in 2019–20. During the pandemic, the US Department of Education allowed a testing pause, and states requested flexibility to extend the first improvement cycle. States began their second cycle when flexibility expired (between 2020–21 and 2023–24).

States were required to identify no less than the lowest-performing 5 percent of all schools for Comprehensive Support and Improvement (CSI). CSI is the most intensive school intervention under ESSA and involves additional resources and the implementation of a school improvement plan. States also designated schools as either Targeted Support and Improvement (TSI) or Additional Targeted Support and Improvement for low achievement among marginalized students. ESSA also revoked NCLB requirements that schools implement drastic improvement policies (e.g., school closure or dismissal of school leaders).

States use either a relative system or an absolute system to identify CSI schools.[1] States with absolute systems designate as CSI all schools that fall below a specific threshold. States with relative systems fix the number of CSI schools to the overall total number of schools, which is stable across time. For example, Minnesota identified the lowest-performing 35 elementary schools and the lowest-performing 9 middle schools for the CSI designation.[2] ESSA's text suggests that 5 percent of schools should be assigned the CSI designation. But in practice, many states employ absolute systems that use a criterion measure that identifies more than 5 percent of schools.

The expansion of school accountability is a concern because research on its effects is not clearly positive. The American Institutes for Research examined data from 2019 and found that the CSI designation did not influence prepandemic student outcomes.[3] But evidence from Michigan shows that school accountability improves student outcomes for the lowest-achieving students.[4] Qualitative findings show that providing state-level supports, strategic planning, the threat of accountability for continued low performance, and improved leadership quality in turnaround schools explain the positive effects. Research on the effects of school accountability during the pandemic is nascent. A postpandemic study from Michigan showed that school accountability may have mitigated the pandemic's negative effects. States have only started to release data on the second cycle of school improvement under ESSA in the past 12 to 18 months.[5]

I analyzed data on the first two ESSA improvement cycles. I collected data from the Education Department and 46 state education agency websites.[6] States designated significantly more CSI schools (i.e., 31 percent) in the second cycle compared with the first cycle.

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[1] The Education Commission of the States describes six types of state accountability systems. I categorize states as using either an absolute system (i.e., an A–F rating system, an index rating system, and a 1–5 star system) or a relative system (i.e., dashboard, descriptive, or federal tiers of support). See Ben Erwin, Cassidy Francies, Damion Pechota, and Meghan McCann, "50-State Comparison: States' School Accountability Systems," Education Commission of the States, December 8, 2021, https://www.ecs.org/50-state-comparison-states-school-accountability-systems/.

[2] Minnesota Department of Education, *Minnesota's Consolidated State Plan under the Every Student Succeeds Act (ESSA)* (Minneapolis: Minnesota Department of Education, 2018).

[3] Drew Atchison and Kerstin Carlson le Floch, "The Impact of CSI Designation in Multiple Measure ESSA Accountability Systems," American Institutes for Research, accessed July 7, 2023, https://www.air.org/project/impact-csi-designation-multiple-measure-essa-accountability-systems.

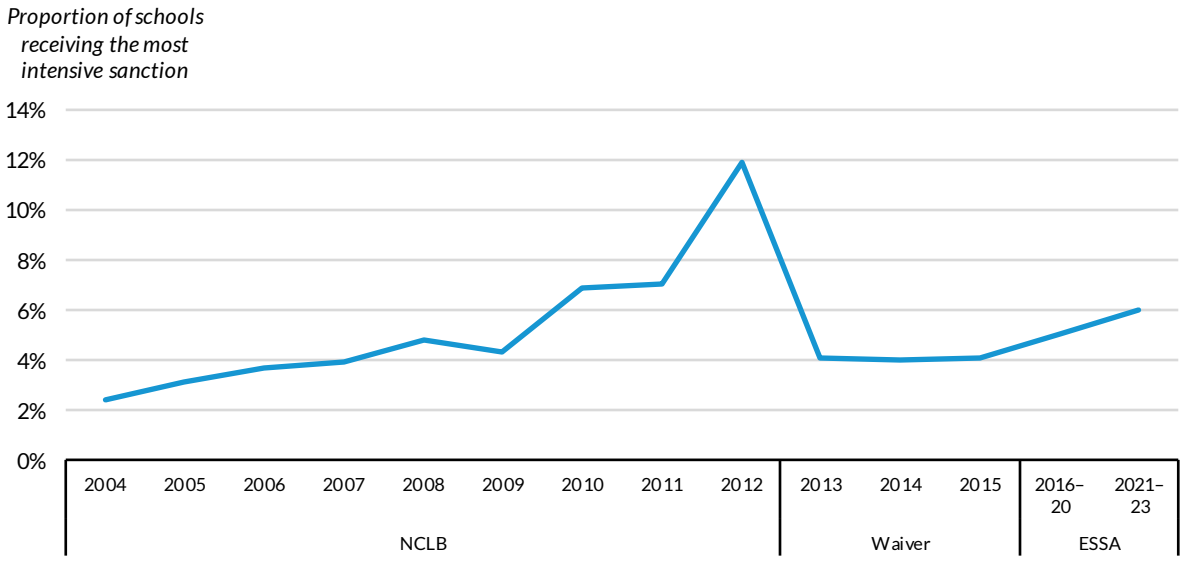
[4] Jason Burns, Erica Harbatkin, Katharine O. Strunk, Chris Torres, Aliyah Mcilwain, and Sandy Frost Waldron, "The Efficacy and Implementation of Michigan's Partnership Model of School and District Turnaround: Mixed-Methods Evidence from the First 2 Years of Reform Implementation," *Educational Evaluation and Policy Analysis*, https://doi.org/10.3102/01623737221141415.

[5] Samantha Cullum and Erica Harbatkin, "Student Achievement in the First Two Cohorts of Partnership Schools" (East Lansing: Michigan State University, Education Policy Innovation Collaborative, 2023).

[6] I collected data on CSI schools from each of the two ESSA improvement cycles. Data from the end of the first cycle in 2019–20 is available from the Education Department's Ed Data Express (https://eddataexpress.ed.gov/). Every state is included in the Ed Data Express file. I replaced the data from 2019–20 with state-reported data from 2018–19 for Arizona and West Virginia. Arizona erroneously reports zero CSI schools, and West Virginia does not differentiate between improvement statuses (i.e., CSI and TSI) in the Education Department data. I collected data from the second cycle of school improvement from 46 state education agency websites. Five states have not yet announced CSI schools in the second cycle. The five states that have not released CSI schools postpandemic are

FIGURE 1

Growth in Intensive Accountability Interventions under ESSA



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Sources: 2004–07 data come from the National Adequate Yearly Progress and Identification database (see "National AYP and Identification Database," American Institutes for Research, accessed July 17, 2023, https://www.air.org/project/national-ayp-and-identification-database), 2008–10 data come from Consolidated State Performance Reports (see "Consolidated State Performance Reports," US Department of Education, accessed July 17, 2023, https://web.archive.org/web/20210318001330/https://www2.ed.gov/admins/lead/account/consolidated/index.html), and 2011–15 data come from school status files (see ED*Facts* Data Files," US Department of Education, accessed July 17, 2023, https://www2.ed.gov/about/inits/ed/edfacts/data-files/school-status-data.html#ss).
Note: ESSA = Every Student Succeeds Act; NCLB = No Child Left Behind.

The proportion of schools identified for intensive school accountability interventions under ESSA is high compared with previous policies. Figure 1 shows the proportion of schools receiving intensive accountability interventions under NCLB, NCLB waivers, and ESSA.[7] Under NCLB and the NCLB waivers, schools were identified for improvement annually. NCLB set escalating achievement targets that led the proportion of schools identified for intensive interventions to increase beginning in 2009, reaching a peak of almost 12 percent in 2012.

The Obama administration created the waiver program to prevent too many schools from being identified for improvement; rising achievement targets would have culminated in every school failing. A plain reading of ESSA suggests that the lowest 5 percent of schools should receive the CSI designation.

Maine, New Mexico, Ohio, South Carolina, and Vermont. The lack of second-cycle CSI data was confirmed via email for each state. To validate that the federal and state data were equivalent, I also collected school accountability data for the 2019–20 school year from California, Texas, and Virginia. I then confirmed that the same CSI schools were observed in each file. I observed traditional public schools that were eligible to be designated for school improvement (i.e., receive Title I funds) in the Common Core of Data for the 2021–22 school year.

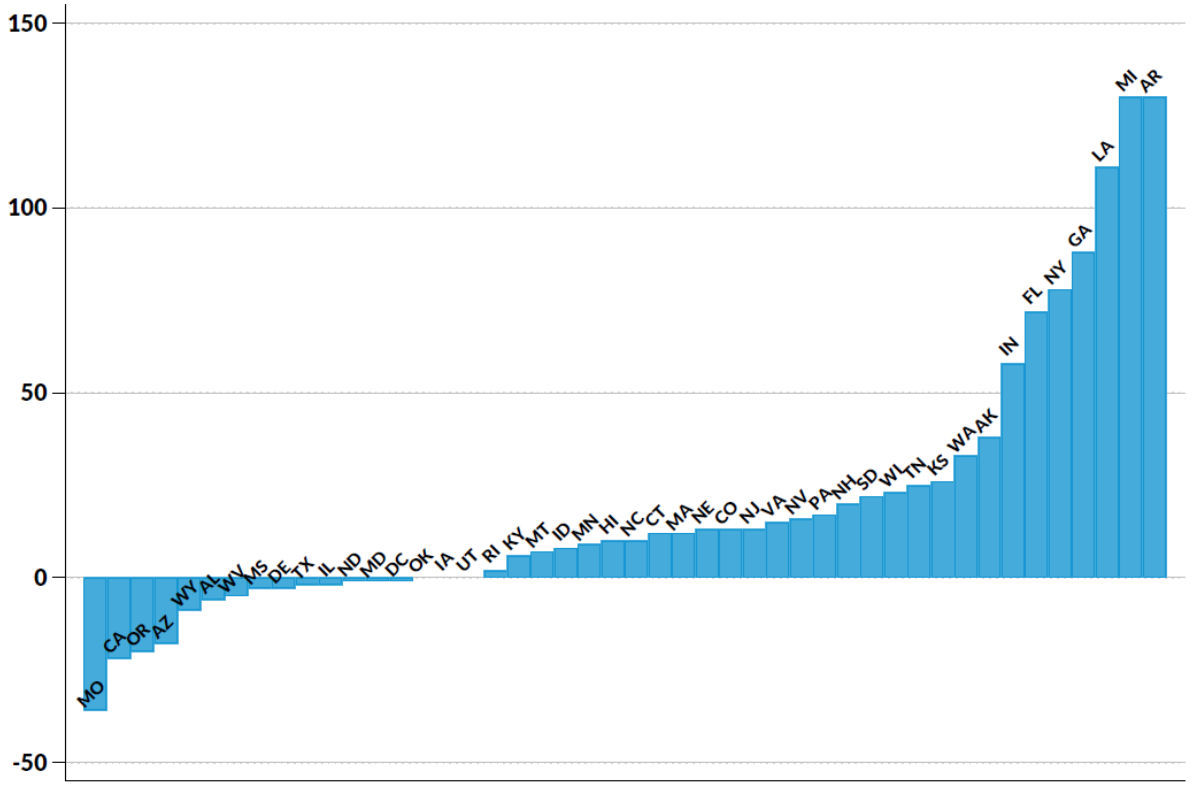
[7] Intensive interventions under NCLB were corrective action, restructuring planning, and restructuring. Under the NCLB waivers, the intensive intervention was priority schools, and under ESSA, intense intervention is CSI schools.

As expected, about 5 percent of schools were identified in the first ESSA improvement cycle. During the second cycle, the proportion of schools with intensive designations increased 1 percentage point. The proportion of schools that received a CSI designation in the second ESSA cycle is comparable with the proportion when policymakers began to conceive of the NCLB waivers.

FIGURE 2

Increase in CSI Schools in the Second Every Student Succeeds Act Cycle

Change in the number of CSI schools



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Sources: Data are available on GitHub. Data for the first cycle for the 2019–20 school year are available at "Data Builder," US Department of Education, Ed Data Express, accessed July 17, 2023, https://eddataexpress.ed.gov/download/data-builder. Data for the second cycle were collected from each state education agency website. Links to these data are available upon request.

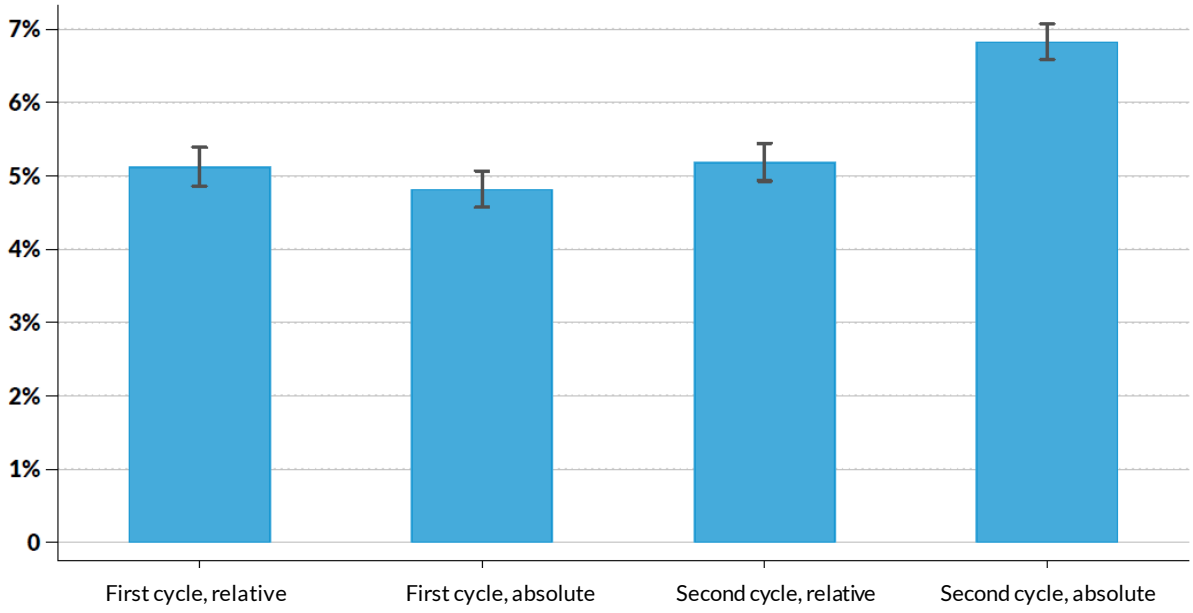
Note: CSI = Comprehensive Support and Improvement.

The number of CSI schools increased in the second cycle for 30 of the 46 states for which data were available. Figure 2 shows the change in the number of CSI schools in the second cycle relative to the first cycle. A total of 3,024 CSI schools were observed in the first cycle, and 3,963 CSI schools were observed in the second cycle, a 31 percent increase. The number of CSI schools increased modestly (between 8 and 57 percent) in 22 states. In 8 states, the number of CSI schools more than doubled. Among the 13 states that identified fewer CSI schools, the magnitude of the decrease was small.

FIGURE 3

Differences in Number of CSI Schools, by Identification System and Cohort

Proportion of CSI schools in the state



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Sources: Data are available on GitHub. Data for the first cycle for the 2019–20 school year are available at "Data Builder," US Department of Education, ED Data Express, accessed July 17, 2023, https://eddataexpress.ed.gov/download/data-builder. Data for the second cycle were collected from each state education agency website. Links to these data are available upon request.

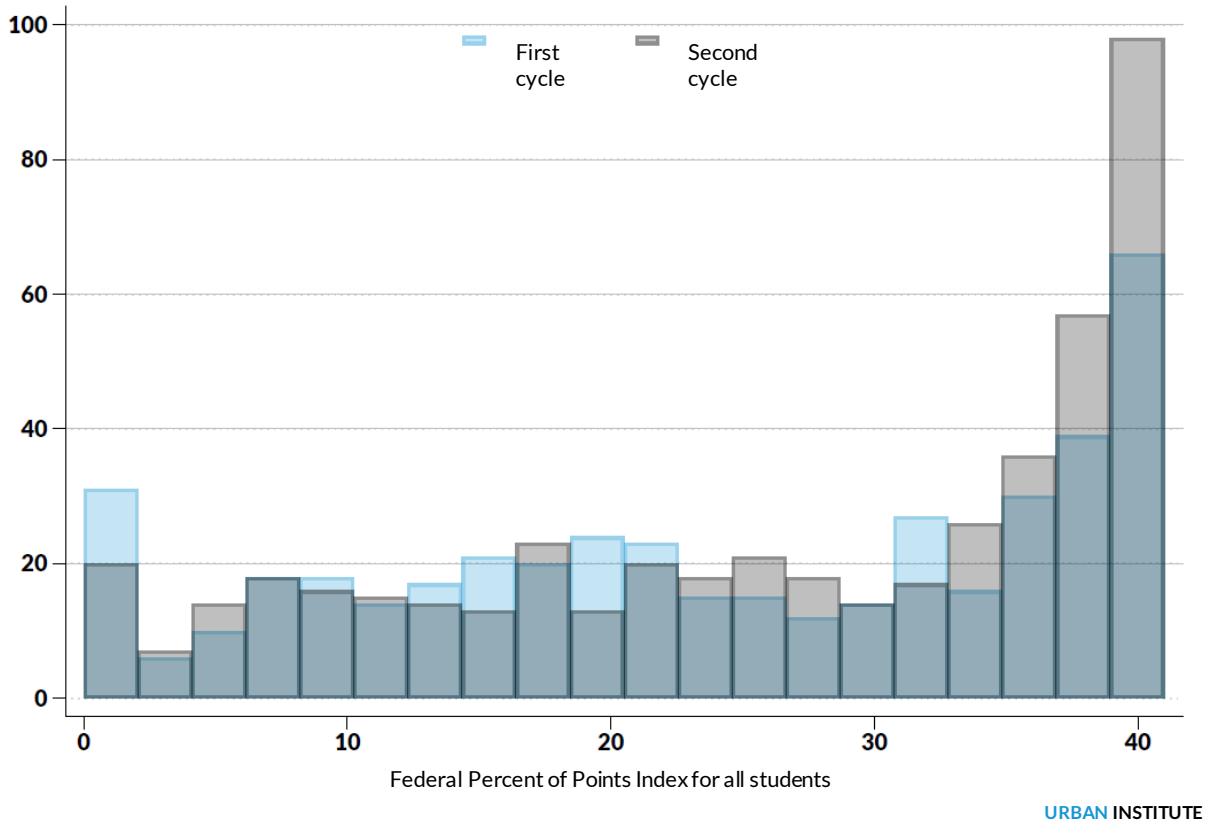
Note: CSI = Comprehensive Support and Improvement.

Absolute systems identified significantly more CSI schools than relative systems did in the second ESSA cycle. Figure 3 shows the proportion of CSI schools in states with absolute and relative systems during the first and second ESSA cycles. In the first cycle, states with relative and absolute systems both identified approximately 5 percent of schools with the CSI status. In the second cycle, the proportion of CSI schools is 2 percentage points greater in absolute systems than in relative systems.

FIGURE 4

Shift in the Distribution of Florida Relative Ratings across Every Student Succeeds Act Cycles

Frequency



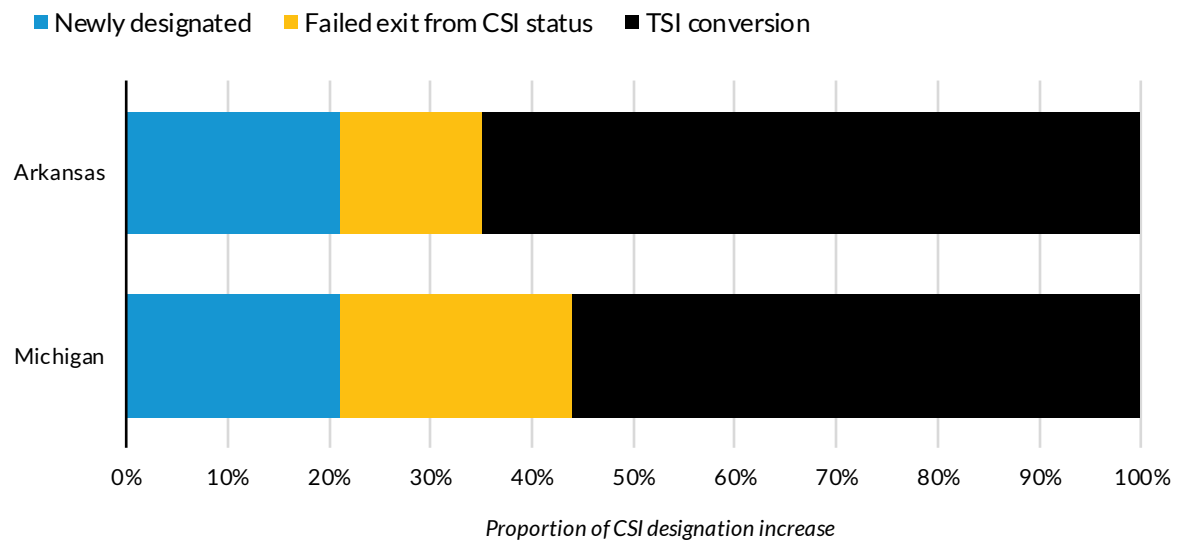
Source: Florida Department of Education, *Every Student Succeeds Act (ESSA) State Plan* (Tallahassee: Florida Department of Education, 2018).

Figure 4 illustrates why CSI designations increased during the pandemic in states that use absolute systems. Figure 4 shows the distribution of Florida's Federal Percent of Points Index, used to identify CSI schools during the first and second ESSA cycles. Florida assigns the CSI designation to elementary and middle schools if their index falls below 41 percent.[8] A school's index value is determined by various student outcomes. Despite minimal changes to the algorithm used to create the state's index, more schools in Florida fell below the 41 percent threshold during the second cycle.

[8] Florida Department of Education, *Every Student Succeeds Act (ESSA) State Plan* (Tallahassee: Florida Department of Education, 2018).

FIGURE 5

Systemic Factors Explaining Increases in CSI Designations in Arkansas and Michigan



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Sources: "2022 ESSA School Support and Improvement," Arkansas Department of Education, accessed July 7, 2023, https://docs.google.com/spreadsheets/d/1nbesYDRbMb5svoWZkjezOMhfjnfGGbTe96pTHk2rWj8/edit#gid=412021618; and "Resources for Schools Identified for CSI, ATS, or TSI," Michigan Department of Education, accessed July 7, 2023, https://www.michigan.gov/mde/services/school-performance-supports/resources-for-identified-schools.
Note: CSI = Comprehensive Support and Improvement; TSI = Targeted Support and Improvement.

Schools that were converted to CSI after multiple years of poor outcomes for marginalized students (i.e., TSI conversions) and schools that could not meet the CSI exit criteria also explain the increase in CSI schools. Figure 5 shows the proportion of the increase in CSI schools caused by TSI conversions and failed exits from CSI status. Most states do not provide detailed data on the reason a school receives a CSI designation. Arkansas and Michigan do provide those data and are two of the states with the largest increases in CSI designations.[9] Conversions from TSI to CSI accounted for 22 percent of the increase in CSI designations for both Arkansas and Michigan. CSI schools whose outcomes were strong enough to not be redesignated but did not improve enough to exit CSI status explain 23 percent of the increase in CSI designations in Arkansas and 15 percent in Michigan.[10]

The number of CSI schools that cannot exit their designation is likely to increase in the future, with the pandemic-related changes having compounding effects on school accountability systems. To exit

[9] "2022 ESSA School Support and Improvement," Arkansas Department of Education, accessed July 7, 2023, https://docs.google.com/spreadsheets/d/1nbesYDRbMb5svoWZkjezOMhfjnfGGbTe96pTHk2rWj8/edit#gid=412021618; and "Resources for Schools Identified for CSI, ATS, or TSI," Michigan Department of Education, accessed July 7, 2023, https://www.michigan.gov/mde/services/school-performance-supports/resources-for-identified-schools.

[10] In both Michigan and Arkansas, there were 130 more CSI schools in the second cycle than in the first cycle. The proportions in figure 5 describe the number of CSI schools that were TSI conversions, failed exists from CSI status, and newly designated, divided by the number of newly identified CSI schools (i.e., 130).

the first cycle, CSI schools must increase their achievement by the amount specified in the original state plan and reverse any decline in pandemic-related outcomes. The number of CSI schools will continue to increase, as few first-cycle CSI schools are able to exit that designation. School improvement will only become more difficult in future years, as ESSA's procedure for identifying CSI schools will break down because of the pandemic's unforeseen effects. State policymakers should focus on designing accountability systems that minimize unintended harm and promote equity within specific state contexts.

Trade-Offs between Absolute and Relative Accountability Systems

There are strengths and weaknesses to both relative and absolute accountability systems. One strength of relative systems is their clearly defined goals. In an absolute system, a school receives a CSI designation if its index falls below a specified point. The clearest disadvantage of a system identifying more CSI schools is that states receive a fixed appropriation of school improvement funding. More specifically, school improvement funding is based on enrollment in Title I schools. Each additional CSI school decreases the resources available to all other schools in the state. A back-of-the-envelope estimate based on district-level Title I funding suggests that a 10 percent increase in the number of CSI schools decreases per pupil expenditures by about $20. Even small spending cuts will likely reduce the likelihood that the CSI designation will improve student outcomes.

The main weakness of relative state accountability systems is the opaque process through which the schools are designated. Because the number of CSI schools is fixed, the schools assigned CSI designations are subject to the whims of the school's performance compared with other schools in the state. In theory, a school could not be identified for improvement in the first cycle and improve performance over the next few years but could be leapfrogged by other schools and assigned CSI status in the second cycle. One advantage of a relative system during the pandemic is that the number of CSI schools remained about the same. This is also a weakness, though, in that many more schools would benefit from extra support.

Policy Implications

States concerned about increases in the number of CSI schools can amend accountability plans, such as by adopting a relative accountability system that fixes the number of CSI designations. States can also amend their exit criteria to allow schools to exit if they move out of the bottom 5 percent. Some states supplemented their relative or absolute systems with additional criteria. For example, Florida assigns the CSI designation to schools above the 41 percent cutoff that earned a D or F grade. Additional criteria are not required by ESSA, and removing these requirements will likely cause a small decrease in the number of CSI schools.

States may also want to consider decreasing the weight placed on tests when designating CSI schools. Standardized assessments require a high level of capacity to execute. Even before the pandemic, test cancellations were not rare. Standardized tests were judged not to be useable for

accountability when piloting the Common Core exams, facing administrative challenges and cheating.[11] Relatedly, states should consider adding or increasing the weight placed on non–test score measures (e.g., school climate and student or parent surveys).

Federal policymakers also have a role. ESSA reauthorization, which was passed eight years ago, is now overdue. Congress could base school improvement funding on the number of students enrolled in CSI schools, which would expand accountability systems without penalizing schools in need of support. Providing additional funding to states that choose to identify more than 5 percent of schools for CSI is consistent with ESSA's goal of providing greater flexibility. ESSA does not permit states to change the achievement targets for schools that received CSI designations in the first cycle to exit that status. To exit the first cycle, CSI schools must increase their achievement by the amount specified in the original state plan and reverse any pandemic-related decline in outcomes. Congress should allow states to amend exit criteria to prevent an unintentional increase in the number of CSI schools.

The federal government could also fund research to develop more sophisticated measures to designate struggling schools. It is unlikely that a single approach to school designation is uniformly superior. But we do not know enough about the trade-offs between different approaches. Research is needed on how to designate underresourced schools that serve marginalized students.

Another role for the federal government is to invest in state capacity to collect data that states can use to update their accountability systems. During NCLB, the Statewide Longitudinal Data Systems Grant Program gave states the resources to store and analyze data from standardized tests. State systems used to designate schools for improvement could benefit from a similar investment in the development and administration of new measures (e.g., surveys, school climate, achievement, and learning).

I find that CSI designations increased because of the type of systems states used (i.e., absolute or relative), the conversion of TSI schools into CSI schools, and the small proportion of schools that were able to exit the CSI designation. Relative and absolute systems typically identify the same proportion of CSI schools. But the pandemic systematically worsened student outcomes, and states with absolute systems are sensitive to this change. The increase in the number of CSI schools is also explained by sustained low outcomes for marginalized students in TSI schools. Schools that received the less stringent TSI designation in the first improvement cycle were eligible to be transferred to CSI status in the second improvement cycle if outcomes for marginalized students did not improve. ESSA also requires schools to improve student outcomes from the point of identification to exit CSI status. It is

[11] Emma Brown, "Tennessee Cancels Standardized Testing in Elementary and Middle Schools, Citing Delayed Delivery of Exams," *Washington Post*, April 27, 2016, https://www.washingtonpost.com/news/education/wp/2016/04/27/tennessee-cancels-standardized-testing-in-elementary-and-middle-schools-citing-delayed-delivery-of-exams/; John McCrank, "ACT Cancels Some College Entrance Exams after Test Leak," Reuters, September 7, 2017, https://www.reuters.com/article/us-usa-college-cheating-idUSKCN1BI29P; and Patrick O'Donnell, "Ohio Dumps the PARCC Common Core Tests after Woeful First Year," *Cleveland Plain Dealer*, last updated July 1, 2015, https://www.cleveland.com/metro/2015/06/ohio_dumps_the_parcc_common_core_tests_after_woeful_first_year.html.

unlikely that schools struggling before the pandemic have sufficient resources to improve outcomes above prepandemic levels.

At the beginning of the pandemic, education policymakers faced a unique and unexpected challenge. The pandemic instigated a series of interrelated policy problems, including the rapid transition to online schooling, the safe reopening of schools, and the pursuit of high expectations for student outcomes. Policymakers will face a wave of second-order policy challenges. The number of CSI schools that cannot exit their designation is likely to increase in the future, with pandemic-related changes having compounding effects on school accountability systems. Action by both state and federal policymakers should focus on designing accountability systems that minimize unintended harm and promote equity within specific state contexts.

Josh Bleiberg is an assistant professor of education policy at the University of Pittsburgh School of Education.

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