



# VIRGINIA BOARD OF EDUCATION

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# AGENDA ITEM

**Agenda Item:** O

**Date:** March 17, 2022

**Title:** First Review of COVID-19 Addendum to Virginia's ESSA Consolidated State Plan

**Presenter:** Amy Siepka, Director of Accountability

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**Purpose of Presentation:**

Action required by state or federal law or regulation.

**Executive Summary**

The United States Department of Education (USED) provided a streamlined process for State Educational Agencies (SEA) to propose modifications to their Consolidated State Plans as they implement accountability requirements in 2022-2023, based on 2021-2022 data. USED provided a COVID-19 template that allows SEAs to select the flexibilities that are appropriate for the state, based on the interruptions to the federal accountability model over the past several years. The modifications proposed in the addendum are to be temporary (one year). Long term changes due to COVID-19 would require a follow-up addendum later in the year.

The COVID-19 addendum was posted for public comment from February 11, 2022, through March 14, 2022, (announced in [Superintendent's Memorandum #035-22](#)). In addition, the Committee of Practitioners (COP), mandated by federal statute 20 USC §6573, whose responsibility it is to advise the state in carrying out its responsibilities under Title I, met to discuss the proposed COVID-19 addendum on February 23, 2022. Most of the public comments and the COP were supportive of the modifications in the amendment, but there were changes to the original proposal as a result of the COP's recommendation.

The proposed modifications to the Consolidated State Plan in the COVID-19 Addendum are to:

- Move the state measures of interim progress forward by two years for Reading Performance; Mathematics Performance; Chronic Absenteeism; Federal Graduation Indicator (FGI); and English Learner progress.
- Change the methodology of how schools are identified in fall 2022 for Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI).
- Revise the timeline, or the “count of years,” a school is in CSI or Additional Targeted Support and Improvement (ATSI) status by omitting the 2019-2020 and 2020-2021 data years, which are the two waived accountability years 2020-2021 and 2021-2022, respectively.
- Revise the exit criteria timeline for CSI and ATSI for the subset of schools that were first identified in fall 2018. The revision allows schools four years in CSI or ATSI status, rather than three, prior to being identified for additional interventions or CSI status, respectively.
- Revise the exit criteria for CSI schools in fall 2022 only so that all currently identified CSI schools can exit if they meet one criteria: they are no longer in the bottom 5% or the lowest performing schools, based on 2021-2022 data.

The proposed COVID-19 Addendum containing these modifications is included as Attachment B.

This item aligns with “Priority 3: Ensure successful implementation of the *Profile of a Virginia Graduate* and the accountability system for school quality as embodied in the revisions to the *Standards of Accreditation*” from the [Board of Education Goals from the 2018-2023 Comprehensive Plan](#).

**Action Requested:**

Other: The Board is requested to waive first review and approve the COVID-19 Addendum for submission to USED.

**Superintendent’s Recommendation**

The Superintendent of Public Instruction recommends that the Board of Education waive first review and approve the COVID-19 Addendum for submission to USED.

**Rationale for Action:**

Board action is required of this proposed COVID-19 Addendum so that it can be submitted to USED to for potential approval of the modifications prior to the federal accountability determinations in summer 2022. USED recommends that SEAs get the proposals to them as close to March 7, 2022 as possible.

**Background Information and Statutory Authority:**

The Elementary and Secondary Education Act of 1965 (ESEA) requires each State to develop and implement a single, statewide accountability system to support all public elementary school and secondary school students in meeting the challenging State academic standards. These systems are an important tool in achieving the goal of improving outcomes for students and eliminating opportunity gaps in the State, local educational agencies (LEAs), and schools.

Due to the extraordinary circumstances created by the COVID-19 pandemic, the USED invited SEAs to apply for a waiver from the accountability requirements of the ESEA for the 2019-2020 and 2020-2021 school years and the assessment requirements for the 2019-2020 school year. As a result, many SEAs have not implemented all aspects of their statewide accountability systems or identified schools for support and improvement since fall 2019. Upon receiving an accountability waiver for the 2020-2021 school year, each SEA agreed that it would resume identifying schools for comprehensive, targeted, and additional targeted support and improvement using data from the 2021-2022 school year in the fall of 2022 to ensure school identification resumes as quickly as possible.

The purpose of COVID-19 Addendum template is to provide SEAs a streamlined process to modify approved ESSA Consolidated State Plans for the 2021-2022 school year as they implement accountability and school identification requirements under section 1111 of the ESEA in order to make accountability determinations and identify schools in fall 2022.

The proposed modifications to the Virginia Consolidated State Plan in the COVID-19 Addendum are to:

- Move the state measures of interim progress forward by two years for Reading Performance; Mathematics Performance; Chronic Absenteeism; Federal Graduation Indicator (FGI); and English Learner progress.
- Change the methodology of how schools are identified in fall 2022 for Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI).
- Revise the timeline, or the “count of years,” a school is in CSI or Additional Targeted Support and Improvement (ATSI) status by omitting the 2019-2020 and 2020-2021 data years, which are the two waived accountability years 2020-2021 and 2021-2022, respectively.
- Revise the exit criteria timeline for CSI and ATSI for the subset of schools that were first identified in fall 2018. The revision allows schools four years in CSI or ATSI status, rather than three, prior to being identified for additional interventions.
- Revise the exit criteria for CSI schools in fall 2022 only so that all currently identified CSI schools can exit if they meet one criteria: they are no longer in the bottom 5% or the lowest performing schools, based on 2021-2022 data.

The proposed COVID-19 Addendum containing these modifications is included as Attachment B.

[The addendum was posted for public comment](#) from February 11, 2022, through March 14, 2022, (announced in [Superintendent's Memorandum #035-22](#)). In addition, the Committee of Practitioners (COP), mandated by federal statute [20 USC §6573](#), whose responsibility it is to advise the state in carrying out its responsibilities under Title I, met to discuss the proposed COVID-19 addendum on February 23, 2022. By and large, the public comments and the COP were supportive of the modifications in the amendment, but there were changes to the original proposal as a result of the COP's recommendation.

**Timetable for Further Review/Action:**

Following Board approval, VDOE will submit the COVID-19 Addendum to USED. After approval/feedback from USED, timely communication to school divisions, prior to accountability reporting, will occur.

**Impact on Fiscal and Human Resources:**

There is no impact of the action on VDOE resources (fiscal or staff), nor on the local school divisions' resources.

# COVID -19 Addendum to Virginia's ESSA Consolidated State Plan

Presentation to the Board of Education  
March 17, 2022

## COVID -19 Addendum (1 of 3)

- The United States Department of Education (USED) provided a streamlined process for State Educational Agencies (SEA) to propose modifications to their Consolidated State Plans as they implement accountability requirements in 2022-2023, based on 2021-2022 data.
- USED provided a COVID-19 template that allows SEAs to select the flexibilities that are appropriate for the state, based on the interruptions to the federal accountability model over the past several years.

## COVID -19 Addendum (2 of 3)

- The modifications proposed in the addendum are to be temporary (one year).
- Long term changes due to COVID19 would require a follow-up addendum later in the year.
- The addendum was posted for public comment from February 11, 2022 through March 14, 2022 (announced in [Superintendent's Memorandum #03522](#)).

## COVID -19 Addendum (3 of 3)

- The Committee of Practitioners (COP), mandated by federal statute [20 USC §6573](#), whose responsibility it is to advise the state in carrying out its responsibilities under Title I, met to discuss the proposed COVID19 addendum on February 23, 2022.
- By and large, the public comments and the COP were supportive of the modifications in the amendment, but there were changes to the original proposal as a result of the COP's recommendation.



# Review of Federal Accountability Indicators

- Academic Achievement in Reading, Mathematics, and Science
- Participation in Reading, Mathematics, and Science
- Growth in Reading and Mathematics
- Chronic Absenteeism
- English Learner Progress
- Federal Graduation Index

# State Measures of Interim Progress

Each year, school performance is rated against a measure of interim progress or “target” for some of the indicators. These targets bring schools towards a long-term goal.

Indicators that have targets are:  
**Academic Achievement in Reading and Mathematics** ; **Participation in Reading and Mathematics** (target does not change, it is 95% each year); **Chronic Absenteeism** ; **Federal Graduation Index** ; and **English Learner Progress** .

Determining Values: Chronic Absenteeism

Subgroup	Data Source	Students Counted	Total Students	Rate	Target	Target Met?
All Students	Current	57	698	8.17	14	Y
	3-Year	190	2147	8.85	14	Y
Asian	Current	0	3	0	10	15
	3-Year	0	8	0	10	15
Black	Current	33	281	11.74	15	Y
	3-Year	87	839	10.37	15	Y
Hispanic	Current	6	119	5.04	15	Y
	3-Year	25	373	6.7	15	Y
White	Current	18	290	6.21	15	Y
	3-Year	76	904	8.41	15	Y
Students with Disabilities	Current	16	105	15.24	20	Y
	3-Year	39	292	13.36	20	Y
Economically Disadvantaged	Current	44	407	10.81	19	Y
	3-Year	136	1208	11.26	19	Y
English Learners	Current	2	68	2.94	13	Y
	3-Year	14	235	5.96	13	Y

# Example: Measures of Interim Progress

The [state measures of interim progress](#) are available on the Virginia Department of Education website.

## Mathematics

\*\* Subgroups that meet or exceed the target must improve from the previous year.

N/A	Baseline	Year 1 Targets	Year 2 Targets	Year 3 Targets	Year 4 Targets	Year 5 Targets	Year 6 Targets	Year 7 Targets Long Term Goal
Assessment Yr.	2015-2016	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
Accountability Yr.	N/A	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
All students	74	74	75**	75**	75**	75**	75**	70**
Asian students	89	89	91**	91**	91**	91**	91**	70**
Black students	60	60	60	62	64	66	68	70
Economically Disadvantaged students	62	63	63	64	66	67	68	70
English Learners	55	57	61	62	64	66	68	70
Hispanic students	63	64	65	66	67	68	69	70
Students with Disabilities	39	42	40	46	52	58	64	70
White students	81	81	83**	83**	83**	83**	83**	70**

# Proposed Modification #1

Move the current state measures of interim progress forward by two years for Reading Performance; Mathematics Performance; Chronic Absenteeism; Federal Graduation Indicator (FGI); and English Learner progress.


**Statewide Accountability System and School Support and Improvement Activities** (ESEA section 1111(c) and (d)) (corresponds with A.4 in the revised State plan template):

- a. **Establishment of Long-Term Goals.** (ESEA section 1111(c)(4)(A)) (corresponds with A.4.iii in the revised State plan template) Due to COVID-19, the State is revising its long-term goal(s) and measurement(s) of interim progress by shifting the timeline forward by one or two years for:
1. **Academic Achievement.** If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.  
 One Year  
 Two Years
  2. **Graduation Rate.** If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.  
 One Year  
 Two Years
  3. **Progress in Achieving English Language Proficiency (ELP).** If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.  
 One Year  
 Two Years

5.  **School Quality or Student Success Indicator(s).** Describe each School Quality or Student Success indicator that is proposed to be added or modified for the 2021-2022 school year.

The state is proposing to shift the measurements of interim progress forward by two years for the Chronic Absenteeism Indicator.

# Move Targets Forward Two Years



Mathematics	Baseline	Year 1 Targets	Year 2 Targets	Year 3 Targets	Year 4 Targets	Year 5 Targets	Year 6 Targets	Year 7 Targets Long Term Goal
Assessment Yr.	2015-2016	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
Accountability Yr.	N/A	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
All students	74	74	75**	75**	75**	75**	75**	70**
Asian students	89	89	91**	91**	91**	91**	91**	70**
Black students	60	60	60	62	64	66	68	70
Economically Disadvantaged students	62	63	63	64	66	67	68	70
English Learners	55	57	61	62	64	66	68	70
Hispanic students	63	64	65	66	67	68	69	70
Students with Disabilities	39	42	40	46	52	58	64	70
White students	81	81	83**	83**	83**	83**	83**	70**

\*\* Subgroups that meet or exceed the target must improve from the previous year.



# Example: Proposed Mathematics Targets

Mathematics	Baseline	Year 1 Targets	Year 2 Targets	Year 3 Targets	Accountability Waived →	Year 3 Targets	Year 4 Targets	Year 5 Targets	Year 6 Targets	Year 7 Targets Long Term Goal
Assessment Yr.	2015-2016	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
Accountability Yr.	N/A	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
All students	74	74	75**	75**	→	75**	75**	75**	75**	70**
Asian students	89	89	91**	91**	→	91**	91**	91**	91**	70**
Black students	60	60	60	62	→	62	64	66	68	70
Economically Disadvantaged students	62	63	63	64	→	64	66	67	68	70
English Learners	55	57	61	62	→	62	64	66	68	70
Hispanic students	63	64	65	66	→	66	67	68	69	70
Students with Disabilities	39	42	40	46	→	46	52	58	64	70
White students	81	81	83**	83**	→	83**	83**	83**	83**	70**

\*\* Subgroups that meet or exceed the target must improve from the previous year.

# Example: Proposed English Learner Progress Targets

English Learner Progress	Baseline	Year 1 Target	Year 2 Target	Accountability Year 3 Target	Waived →	Year 3 Target	Year 4 Target	Year 5 Target	Year 6 Target	Year 7 Long Term Goal
Assessment Year	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
Accountability Year	N/A	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
EL Progress Target	44	46	48	50	→	50	52	54	56	58

# Committee of Practitioners Discussion

- **Achievement and EL Progress** : Allows schools a reasonable target as they attempt to recoup unfinished learning; many students' learning has been impacted by school closures, illness, quarantine, and virtual schooling.
- **Chronic Absenteeism** : Schools are still grappling with absences from quarantine, illness, and students who are failing to show back up to school consistently after not being in a brick and mortar setting for an extended period of time.
- 2021-2022 has been “the most difficult of the past three years” as absenteeism has directly impacted learning.



# Comprehensive Support and Improvement (CSI) Schools

Comprehensive support and improvement (CSI) schools :

- Not less than the lowest-performing 5 percent of Title I schools, identified by using the state criteria, and data for the *all students group*.
- Title I schools that were previously identified for Additional Targeted Support and Improvement (ATSI) and have not met the statewide exit criteria within three years.
- All public high schools (Title I and non-Title I) in the state with a federal graduation index less than 67%.
- Identified every three years.

# Targeted Support and Improvement (TSI), and Additional Targeted Support and Improvement Schools (ATSI)

## Targeted support and improvement (TSI) schools:

- Public schools (Title I and non-Title I) with *one or more student groups* that meet the State's definition of consistently underperforming.
- Identified every year.

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

- A subset of TSI schools.
- Public schools (Title I and non-Title I) with *one or more student groups* performing at a lower level than the performance of the highest performing Comprehensive Support and Improvement (CSI) school on each indicator.
- Identified every three years.

## Proposed Modifications #2

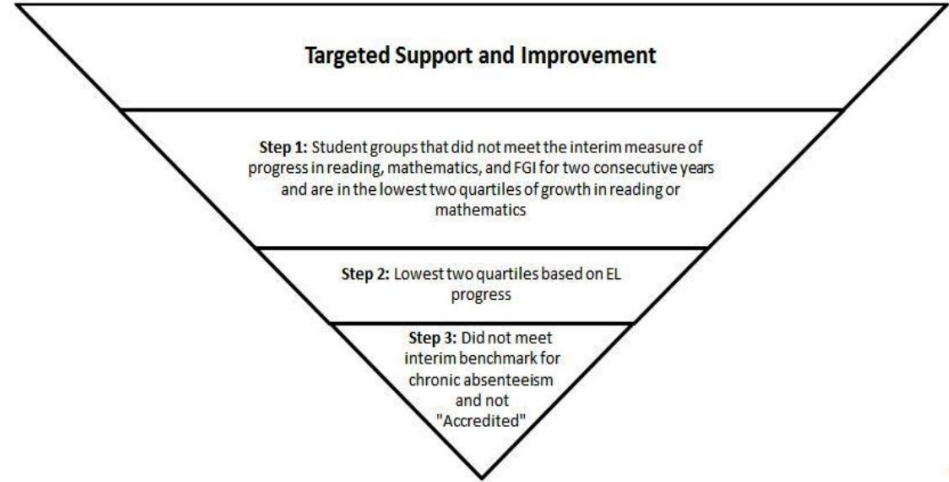
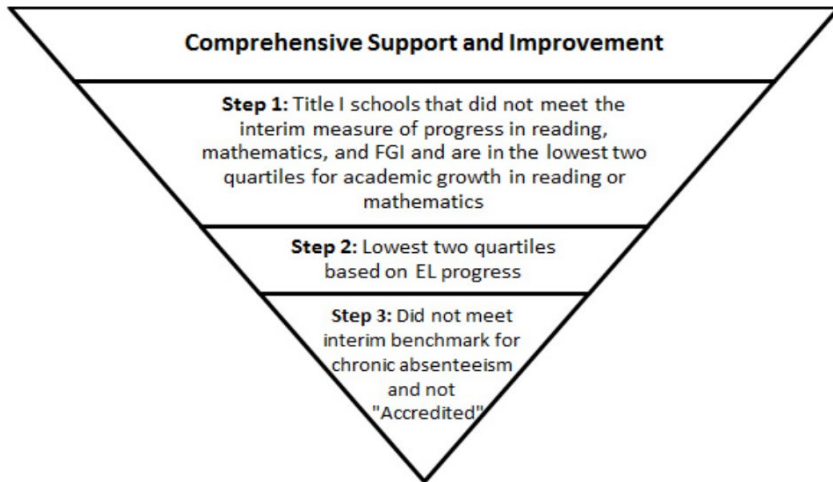
Change the methodology of how schools are identified in fall 2022 for Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI).

Methodologies. The State is revising its methodologies for identifying schools in fall 2022 based on data from the 2021-2022 school year for the following types of school identification:

- A.  Comprehensive Support and Improvement Schools: Low Performing. Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement in fall 2022 based on data from the 2021-2022 school year.
- D.  Targeted Support and Improvement Schools: Consistently Underperforming Subgroup(s). Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including if the State is revising the definition the State uses to determine consistent underperformance

# Why change the methodology? (1 of 3)

- There are three steps, or three sets of criteria, that are used to identify CSI and TSI schools.
- Each step makes the pool of schools being considered for support smaller.



## Why change the methodology? (2 of 3)

- The criteria in Step 3 uses Chronic Absenteeism and Accreditation status as a litmus to “remove schools from the funnel.”
- If a school does not meet the target for Chronic Absenteeism and is also not Accredited, then the school remains in the funnel.
- If a school meets the Chronic Absenteeism target and/or is Accredited, the school is removed from the funnel.

## Why change the methodology? (3 of 3)

- There is a likelihood that more schools will not meet the Chronic Absenteeism target this year than in the past, due to illness and quarantine.
- Therefore, there may not be many schools removed from the funnel at Step 3.
- Since the purpose of the federal school improvement identification process is to provide support to schools that need it the most, a different methodology is needed for the 2022-2023 accountability year.

# The Proposed Change for CSI Identification

Step 3 as written in the Consolidated State Plan:

- *Of those schools identified in Step 1 through 2, identify schools that did not meet the interim measure of progress for chronic absenteeism and have an SOA rating of Accredited with Conditions or Accreditation Denied. Identify a number equal to 5% of Title I schools for comprehensive support and improvement.*

Proposed Step 3 for fall 2022:

- *From the list of schools identified in Steps 1 through 2, **select the schools that do not meet the requirements for being “Accredited” using the most recent data. Then rank order this list of schools by Chronic Absenteeism rate from least to greatest. Starting from the greatest chronic absenteeism rates, identify a number of schools that is equal to 5% of Title I schools.***

# The Proposed Change for TSI Identification

Step 3 as written in the Consolidated State Plan:

- *Of those schools identified in Step 1 through 2, identify schools that did not meet the interim measure of progress for chronic absenteeism for two consecutive years and have an SOA rating of Accredited with Conditions or Accreditation Denied.*

Proposed Step 3 for fall 2022:

- *Of those schools identified in Step 1 through 2, identify schools that a) did not meet the interim measure of progress for chronic absenteeism in the 2018 -2019 data year and b) do not meet the requirements for being Accredited using the most recent data. The identified schools will then be ranked by chronic absenteeism rate using 2021-2022 school year data. Schools with the highest rate of chronic absenteeism will be selected, not to exceed 10% of the public schools in Virginia.*



## Proposed Modifications #3

Revise the timeline, or the “count of years,” a school is in CSI or Additional Targeted Support and Improvement (ATSI) status by omitting the 2019-2020 and 2020-2021 data years.

Exit Criteria for Comprehensive Support and Improvement Schools. Due to COVID-19, the State is revising its statewide exit criteria for schools identified for comprehensive support and improvement using one or more of the options below.

A. Timeline

- i.  The State does not count the 2019-2020 school year toward the number of years (not to exceed four years) in which a school must meet the criteria in order to exit CSI status before it must take more rigorous State-determined actions.
- ii.  The State does not count the 2020-2021 school year toward the number of years (not to exceed four years) in which a school must meet the criteria in order to exit before it must take more rigorous State-determined actions.

Exit Criteria for Schools Receiving Additional Targeted Support. Due to COVID-19, the State is revising the statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) using one or more of the options below:

A. Timeline

- i.  The State does not count the 2019-2020 school year toward the number of years in which a school must meet the criteria in order to exit before, for a school receiving Title I, Part A funds, it becomes a CSI school.
- ii.  The State does not count the 2020-2021 school year toward the number of years in which a school must meet the criteria in order to exit before, for a school receiving Title I, Part A funds, it becomes a CSI school.

## Why revise the timeline? (1 of 2)

- As per the current Consolidated State Plan, if a school does not exit CSI or ATSI status after three years, then the school —
  - For CSI: is required to have “more rigorous interventions”
  - For ATSI: is required to enter into CSI status

## Why revise the timeline? (2 of 2)

- The proposal is to eliminate the 2019-2020 and 2020-2021 data years (the 2020-2021 and 2021-2022 waived accountability years, respectively) from the “count” of years a school was in CSI or ATSI status, because the schools could not exit during those waived accountability years.

# Results of Revision to the Timeline

- Prior to waived accountability years 2020-2021 and 2021-2022, all CSI schools that were identified in fall 2018 and some ATSI schools that were identified in fall 2018, were on year 2 of their support status.
- Schools that do not meet the exit criteria in fall 2022 based on 2021-2022 data, will be in year 3 during accountability year 2022-2023.
- Under our current plan, any school that did not meet the exit criteria in fall 2023 would then require, in the 2023-2024 accountability year —
  - For CSI: “more rigorous interventions”
  - For ATSI: a CSI status

## Proposed Modifications #4 (1 of 4)

Revise the exit criteria timeline for CSI and ATSI for the subset of schools that were first identified in fall 2018. The revision allows schools four years in CSI or ATSI status, rather than three, prior to being identified for additional interventions or CSI status, respectively.

B. Criteria

- i.  The State is revising the statewide exit criteria for schools identified for comprehensive support and improvement that would be eligible to exit status in fall 2022 based on data from the 2021-2022 school year.

B. Criteria

- i.  The State is revising the statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) that would be eligible to exit status in fall 2022 based on data from the 2021-2022 school year.

## Proposed Modifications #4 (2 of 4)

- The COP felt strongly that the revised timeline from Proposed Modification #3 which resulted in non-rated CSI and ATSI schools entering into more rigorous interventions or into CSI status, respectively, during the 2023-2024 accountability year, was placing those schools in a very difficult position.

## Proposed Modifications #4 (3 of 4)

- Since the current year has been difficult for many schools, and more so for the schools that are already the lowest performing, the committee requested a revision to the exit criteria to utilize a “fourth year” that is allowable under [ESSA regulations](#)
  - ESSA allows schools to be in CSI status for a maximum of four years before further interventions are necessary, and ATSI status for a state determined number of years (which implies that it can be four) before it must enter CSI status.

## Proposed Modifications #4 (4 of 4)


With the addition of the fourth year to the exit criteria timeline—

- Schools that don't meet the exit criteria in fall 2022 would still be in year 3 during accountability year 2022-2023;
- Schools that don't meet the exit criteria in fall 2023 would be in year 4 during the 2023-2024 accountability year; and
- Schools that did not meet the exit criteria in fall 2024, would then require in the 2024-2025 accountability year —
  - For CSI: “more rigorous interventions”
  - For ATSI: a CSI status



## Proposed Modification #5 (1 of 3)

Revise the exit criteria for CSI schools so that all currently identified CSI schools can exit if they meet this criteria: they are no longer in the bottom 5% or the lowest performing schools, based on 2021 data.

- i.  The State is revising the statewide exit criteria for schools identified for comprehensive support and improvement that would be eligible to exit status in fall 2022 based on data from the 2021-2022 school year.

## Proposed Modification #5 (2 of 3)

The CSI exit criteria in the Consolidated Plan requires schools to

- Show improvement in mathematics and reading performance as compared to when the school was first identified; and
- No longer be in the bottom 5% of the lowest performing schools.

The proposal is to change the exit criteria in fall 2022 to have only one stipulation—

- That the school is no longer in the bottom 5% of the lowest performing schools.

## Proposed Modification #5 (3 of 3)

CSI Exit criteria as written in the Consolidated State Plan:

- Comprehensive support and improvement schools identified as the lowest five percent of Title I schools will be required to implement interventions to improve student performance in reading and mathematics over a two year period. At the end of year two, a school that demonstrates improved student performance as compared to performance when the school was identified and is no longer in the bottom five percent may exit comprehensive support and improvement status.

Proposed change is to add a sentence to the paragraph above:

- *However, for fall 2022 only, there is only one criteria: A school that is no longer in the bottom five percent based on 2021 -2022 school year data may exit comprehensive support and improvement status.*

## Next Steps

- Requesting that first review is waived.
- VDOE is seeking Board approval of this proposed COVID-19 Addendum so that it can be submitted to USED for potential approval prior to the federal accountability determinations in summer 2022.
  - USED recommends that SEAs get the proposals to them as close to March 7, 2022 as possible.
- After approval/feedback from USED, timely communication to school divisions, prior to accountability reporting, is important.
- VDOE is also planning to submit an amendment to its ESSA plan requesting more permanent changes in late summer, so it would be beneficial for USED to process this addendum prior to the summer amendment being submitted.

**PROPOSAL: FOR PUBLIC COMMENT**

**Document updated March 2, 2022.**

**Updates are on pages labeled 11 and 12.**

**2021-2022 Addendum Template for the Consolidated  
State Plan due to COVID-19**

under the Elementary and Secondary Education Act of  
1965

*Virginia*



**U.S. Department of Education  
Issued: December 2021**

OMB Number: 1810-0576  
Expiration Date: October 31, 2023

**Paperwork Burden Statement** According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0576. The time required to complete this information collection is estimated to average 249 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any

comments concerning the accuracy of the time estimate(s) or suggestions for improving this collection, please write to: U.S. Department of Education, Washington, DC 20202-4537. If you have comments or concerns regarding the status of your individual submission of this collection, write directly to: Office of Elementary and Secondary Education, U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 20202-3118.

## **Addendum to the ESEA Consolidated State Plan**

### **Introduction**

The Elementary and Secondary Education Act of 1965 (ESEA) requires each State to develop and implement a single, statewide accountability system to support all public elementary school and secondary school students in meeting the challenging State academic standards. These systems are an important tool in achieving the goal of improving outcomes for students and eliminating opportunity gaps in the State, local educational agencies (LEAs), and schools.

Due to the extraordinary circumstances created by the Coronavirus Disease 2019 (COVID-19) pandemic, the U.S. Department of Education (Department) invited State educational agencies (SEAs) to apply for a waiver from the accountability requirements of the ESEA for the 2019-2020 and 2020-2021 school years and the assessment requirements for the 2019-2020 school year. As a result, many SEAs have not implemented all aspects of their statewide accountability systems or identified schools for support and improvement since fall 2019. Upon receiving an accountability waiver for the 2020-2021 school year, each SEA agreed that it would resume identifying schools for comprehensive, targeted, and additional targeted support and improvement using data from the 2021-2022 school year in the fall of 2022 to ensure school identification resumes as quickly as possible.

The purpose of this document is to provide SEAs a streamlined process to modify approved ESEA consolidated State plans for the 2021-2022 school year as they implement accountability and school identification requirements under section 1111 of the ESEA in order to make accountability determinations and identify schools in fall 2022.

The Department has also issued a “Frequently Asked Questions: Impact of COVID-19 on 2021-2022 Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)” document that includes information on the general amendment process, accountability systems, school identification and exit, school support and improvement, and report card requirements. The document is available at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/>.

For any questions or additional information, please contact the U.S. Department of Education at [oese.titlei-a@ed.gov](mailto:oese.titlei-a@ed.gov).

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## Submitting Amendments to ESEA Consolidated State Plans

### COVID-19 State Plan Addendum Process

To amend its ESEA consolidated State plan for the 2021-2022 school year *only* (i.e., amendments that will impact only accountability determinations based on data from the 2021-2022 school year and school identifications in fall 2022), an SEA may use this “2021-2022 Template for Addendum to the ESEA Consolidated State Plan due to the COVID-19 National Emergency” (COVID-19 State Plan Addendum).

In addition to requests limited to the 2021-2022 school year, an SEA may use the COVID-19 State Plan Addendum process to request to:

1. Shift timelines forward by one or two years for measurements of interim progress and long-term goals, and
2. Modify the exit criteria for schools identified in fall 2022, including the number of years such schools have to meet exit criteria in order to exit status.

If an SEA requests the two changes described above through the COVID-19 State Plan Addendum and the changes are approved, the SEA must submit an updated ESEA consolidated State plan that incorporates those changes at a later date. All other amendments submitted through the COVID-19 State Plan Addendum template and process (i.e., amendments that are limited to the 2021-2022 school year) do not require submission of an updated ESEA consolidated State plan.

If an SEA submits an amendment to its ESEA consolidated State plan using the streamlined COVID-19 State Plan Addendum template and process, it must submit the following:

1. The COVID-19 State Plan Addendum that reflects all proposed amendments;
2. The signature of the chief State school officer or authorized representative; and
3. A description of how the SEA provided the public a reasonable opportunity to comment on the requested amendments to the ESEA consolidated State plan with a summary of changes made based on the public comments received. The Department recommends that the SEA seek public input through consultation that is broad and with stakeholders that represent the diversity of the community within the State (e.g., meeting with local superintendents and sharing through regular correspondence with LEAs, conducting targeted stakeholder outreach, holding focus groups, prominently listing the proposed amendments on the SEA’s website, and providing a user-friendly, accessible means for the public to submit comments). (See question A-6)

Prior to submitting an amendment to the Department, including an amendment submitted through the COVID-19 State Plan Addendum template and process, an SEA must consult with the Governor, afford a reasonable opportunity for public comment, and consider such comments consistent with the consolidated assurances the State submitted in June 2017 under ESEA section 8304.

### Regular ESEA Consolidated State Plan Process

An SEA may request amendments to its ESEA consolidated State plan that will continue beyond the 2021-2022 school year or that the State intends to implement starting with the 2022-2023 school year using the regular State plan amendment process described in the Department’s October 24, 2019, Dear Colleague Letter available at <https://oese.ed.gov/files/2020/02/csso-letter.pdf>.

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## **Timeline**

An amendment may be submitted at any time. The Department encourages SEAs to submit amendment requests, either using the regular State plan amendment process or the COVID-19 State Plan Addendum process, by **March 7, 2022** in order for the Department to determine whether the requested amendments comply with all applicable statutory and regulatory requirements in time for an SEA to implement amendments to its accountability system for determinations in fall 2022 based on data from the 2021-2022 school year (e.g., identification of schools for comprehensive, targeted, or additional targeted support and improvement for the 2022-2023 school year).

## **Transparency**

The Department will post the approved addendum on our website, along with the current approved consolidated State plan, at

<https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/>.

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## Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)

**Statewide Accountability System and School Support and Improvement Activities** (ESEA section 1111(c) and (d)) (corresponds with A.4 in the revised State plan template):

- a. **Establishment of Long-Term Goals.** (ESEA section 1111(c)(4)(A)) (corresponds with A.4.iii in the revised State plan template) Due to COVID-19, the State is revising its long-term goal(s) and measurement(s) of interim progress by shifting the timeline forward by one or two years for:
1. **Academic Achievement.** *If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.*  
 One Year  
 Two Years
  2. **Graduation Rate.** *If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.*  
 One Year  
 Two Years
  3. **Progress in Achieving English Language Proficiency (ELP).** *If a State is proposing to shift the timeline forward by one or two years, check the appropriate box.*  
 One Year  
 Two Years
- b. **Indicators.** (ESEA section 1111(c)(4)(B)) (corresponds with A.4.iv in the revised State plan template) Due to COVID-19, the State is revising one or more of its indicators for the 2021-2022 school year to be used in accountability determinations in fall 2022.

1.  **Academic Achievement Indicator.** Describe the Academic Achievement indicator for the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

2.  **Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator).** Describe the Other Academic indicator for the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

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3.  Graduation Rate. Describe the Graduation Rate indicator for the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

4.  Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator for the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

5.  School Quality or Student Success Indicator(s). Describe each School Quality or Student Success indicator that is proposed to be added or modified for the 2021-2022 school year.

The state is proposing to shift the measurements of interim progress forward by two years for the Chronic Absenteeism Indicator.

- c. Annual Meaningful Differentiation. (ESEA section 1111(c)(4)(C)) (corresponds with A.4.v in the revised State plan template) Due to COVID-19, the State is revising its system of annual meaningful differentiation in fall 2022 based on data from the 2021-2022 school year:

1.  State's System of Annual Meaningful Differentiation. Describe the State's system of annual meaningful differentiation of all public schools in the State for accountability determinations in the fall 2022 based on data from the 2021-2022 school year.

2.  Weighting of Indicators. Describe the weighting of each indicator in the State's system of annual meaningful differentiation in fall 2022 based on data from 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

3.  Different Methodology. If the State is using a different methodology or methodologies for annual meaningful differentiation for schools for which an accountability determination otherwise cannot be made (e.g., P-2 schools), describe the methodology or methodologies in fall 2022 based on data from 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- d. Identification of Schools. (ESEA section 1111(c)(4)(D)) (corresponds with A.4.vi in the revised State plan template) Due to COVID-19, the State is revising its timeline or methodologies for school identification:

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1. Timeline. Each SEA must identify schools for CSI, ATSI, and targeted support and improvement (TSI) consistent with the assurance in its waiver of accountability requirements for the 2020-2021 school year (i.e., each SEA that received a waiver for the 2020-2021 school year assured it would identify schools in fall 2022 based on data from the 2021-2022 school year).
  - i. After identifying schools in fall 2022 using its approved school identification methodologies as outlined in its approved ESEA consolidated State plan, the State is requesting a one-time change in frequency to identify schools in fall 2023 (based on data from the 2022-2023 school year). *If a State is proposing a one-time change in frequency to identify a category of schools in fall 2023, check the appropriate box.*
    - Comprehensive Support and Improvement Schools: Low Performing
    - Comprehensive Support and Improvement Schools: Low Graduation Rate
    - Comprehensive Support and Improvement Schools: Not Exiting Additional Targeted Support and Improvement Status
    - Targeted Support and Improvement Schools: Additional Targeted Support and Improvement (ATSI)

*\* Targeted support and improvement: Consistently underperforming subgroups (TSI) schools must be identified annually. Therefore, a State must identify TSI schools in both fall 2022 and fall 2023.*

2. Methodologies. The State is revising its methodologies for identifying schools in fall 2022 based on data from the 2021-2022 school year for the following types of school identification:

- A.  Comprehensive Support and Improvement Schools: Low Performing. Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement in fall 2022 based on data from the 2021-2022 school year.

Currently, for Comprehensive Support and Improvement (CSI) for all students, there is a three step process.

- Step 1: Identify Title I schools that did not meet the interim measure of progress for English (reading), mathematics, and FGI and are in the lowest two quartiles for academic growth in English (reading) or mathematics.
- Step 2: Of those schools identified in Step 1, identify schools that did not meet the interim measure for EL progress and are in the lowest two quartiles for EL progress.
- Step 3: Of those schools identified in Step 1 through 2, identify schools that did not meet the interim measure of progress for chronic absenteeism and have an SOA rating of Accredited with Conditions or Accreditation Denied. Identify a number equal to 5% of Title I schools for comprehensive support and improvement.

Notes:

- Schools identified in Step 1 that are missing the EL progress indicator will move to Step 3.
- If additional schools must be identified at the end of Step 3 to meet the requirement to identify 5% of Title I schools, the remaining schools identified in Step 3 (and previous steps if needed) will be ranked by English (reading) and mathematics achievement, with the lowest achieving schools identified until the 5% threshold is met.

Step 3 will be amended to be: From the list of schools identified in Steps 1 through 2, select the schools that do not meet the requirements for being “Accredited” using the most recent data. Then rank order this list of schools by Chronic Absenteeism rate from least to greatest. Starting from the greatest chronic absenteeism rates, identify a number of schools that is equal to 5% of Title I schools.

The second note will be amended to say:

Notes:

- If additional schools must be identified at the end of Step 3 to meet the requirement to identify 5% of Title I schools, the remaining schools identified in Step 2 (and Step 1 if needed) will be ranked by English (reading) and mathematics achievement, with the lowest achieving schools identified until the 5% threshold is met.

- B.  Comprehensive Support and Improvement Schools: Low Graduation Rate. Describe the State’s methodology for identifying all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement in fall 2022.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- C.  Comprehensive Support and Improvement Schools: Not Exiting Additional Targeted Support and Improvement Status. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years for school identifications in fall 2022 based on data from the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- D.  Targeted Support and Improvement Schools: Consistently Underperforming Subgroup(s). Describe the State’s methodology for annually identifying any school with one or more “consistently underperforming” subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including if the State is revising the definition the State uses to determine consistent underperformance

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for school identifications in fall 2022 based on data from at least the 2021-2022 school year.

Currently, for Targeted Support and Improvement (TSI) for all student groups (i.e., subgroups), there is a three step process.

- Step 1: Identify schools that did not meet the interim measure of progress for two consecutive years in one or more subgroups for English (reading), mathematics, and FGI and are in the lowest two quartiles for academic growth in English (reading) or mathematics.
- Step 2: Of those schools identified in Step 1, identify schools that did not meet the interim measure for EL progress and are in the lowest two quartiles for EL progress.
- Step 3: Of those schools identified in Step 1 through 2, identify schools that did not meet the interim measure of progress for chronic absenteeism for two consecutive years and have an SOA rating of Accredited with Conditions or Accreditation Denied.

Notes:

- Schools identified in Step 1 that are missing the EL progress indicator will move to Step 3.

The two consecutive years will be accountability years 2019-2020 (data from 2018-2019 school year) and 2022-2023 (data from 2021-2022 school year).

Academic growth and EL progress will be measured from the 2020-2021 school year data to the 2021-2022 school year data.

Due to the anticipated number of schools that may not meet the measure of interim progress for chronic absenteeism in data year 2021-2022, Step 3 will be amended to be: Of those schools identified in Step 1 through 2, identify schools that a) did not meet the interim measure of progress for chronic absenteeism in the 2018-2019 data year and b) do not meet the requirements for being *Accredited* using the most recent data. The identified schools will then be ranked by chronic absenteeism rate using 2021-2022 school year data. Schools with the highest rate of chronic absenteeism will be selected, not to exceed 10% of the public schools in Virginia.

- E.  Targeted Support and Improvement Schools: Additional Targeted Support and Improvement. Describe the State's methodology for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D) (i.e., schools with subgroups performing as poorly as low-performing schools identified for comprehensive support and improvement) for school identifications in fall 2022 based on data from the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- e. Continued Support for School and LEA Improvement (ESEA section 1111(d)(3)(A)) (corresponds with A.4.viii in the revised State plan template)

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1. Exit Criteria for Comprehensive Support and Improvement Schools. Due to COVID-19, the State is revising its statewide exit criteria for schools identified for comprehensive support and improvement using one or more of the options below.

A. Timeline

- i.  The State does not count the 2019-2020 school year toward the number of years (not to exceed four years) in which a school must meet the criteria in order to exit CSI status before it must take more rigorous State-determined action.
- ii.  The State does not count the 2020-2021 school year toward the number of years (not to exceed four years) in which a school must meet the criteria in order to exit before it must take more rigorous State-determined action.

B. Criteria

- i.  The State is revising the statewide exit criteria for schools identified for comprehensive support and improvement that would be eligible to exit status in fall 2022 based on data from the 2021-2022 school year.

Virginia's current plan states, in part:

Continued Support for School and LEA Improvement (ESEA section III(d)(3)(A))

Exit Criteria for Comprehensive Support and Improvement Schools. Comprehensive support and improvement schools identified as the lowest five percent of Title I schools will be required to implement interventions to improve student performance in reading and mathematics over a two year period. At the end of year two, a school that demonstrates improved student performance as compared to performance when the school was identified and is no longer in the bottom five percent may exit comprehensive support and improvement status.

The proposed revision is to add a sentence to the paragraph:

Comprehensive support and improvement schools identified as the lowest five percent of Title I schools will be required to implement interventions to improve student performance in reading and mathematics over a two year period. At the end of year two, a school that demonstrates improved student performance as compared to performance when the school was identified and is no longer in the bottom five percent may exit comprehensive support and improvement status. However, for fall 2022 only, there is only one criteria: A school that is no longer in the bottom five percent based on 2021-2022 school year data may exit comprehensive support and improvement status.

In addition to the change noted above, make the following modification:

viii. Continued Support for School and LEA Improvement (ESEA section 1111(d)(3)(A)(c))

Virginia's current plan states,

c. More Rigorous Interventions.

If a school identified for comprehensive support and improvement (due to being in the lowest five percent of Title I schools, failing to meet the federal graduation rate of 67%, or not exiting additional targeted support and improvement status) has not exited comprehensive support and improvement status after three years of interventions, Virginia will require the following additional actions in the fourth year of comprehensive support and improvement status:

The proposed revision is:

... Virginia will require the following additional actions in the fourth year of comprehensive support and improvement status.

However, for only the subset of schools identified as CSI in Fall 2018 that do not exit in fall 2022 based on 2021-2022 data: These schools will have the opportunity to exit again in fall 2023 and fall 2024. For schools that do not exit in fall 2024, Virginia will require the following additional actions.

Note: This will allow this subset of schools four years in CSI status, the maximum allowed under ESSA 20 U.S. Code § 6311, prior to being identified for additional actions.

- ii.  The State is revising the statewide exit criteria for schools identified for comprehensive support and improvement in fall 2022 based on data from the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- iii.  The State is revising the State-determined number of years a school identified for comprehensive support and improvement in fall 2022 has to meet the statewide exit criteria in order to exit status, which may not exceed four years, before it must take a State-determined more rigorous action.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

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2. Exit Criteria for Schools Receiving Additional Targeted Support. Due to COVID-19, the State is revising the statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) using one or more of the options below:

A. Timeline

- i.  The State does not count the 2019-2020 school year toward the number of years in which a school must meet the criteria in order to exit before, for a school receiving Title I, Part A funds, it becomes a CSI school.
- ii.  The State does not count the 2020-2021 school year toward the number of years in which a school must meet the criteria in order to exit before, for a school receiving Title I, Part A funds, it becomes a CSI school.

B. Criteria

- i.  The State is revising the statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) that would be eligible to exit status in fall 2022 based on data from the 2021-2022 school year.

Virginia's current plan states,

vi. Identification of Schools (ESEA section 1111(c)(4)(D)(c))

c. Comprehensive Support and Improvement Schools.

Virginia will identify schools for additional targeted support and improvement, as described in item A.4.vi.f. below, every three years beginning with the 2018-2019 school year. If, at the conclusion of three years, a Title I school identified for additional targeted support and improvement fails to meet the exit criteria for such schools described in item A.4.viii.b. below, the school will be identified for comprehensive support and improvement. These schools will be identified every three years beginning with the 2018-2019 school year.

The proposed revision is:

...These schools will be identified every three years beginning with the 2018-2019 school year.

However, for only the subset of schools identified as ATSI in Fall 2018 that are Title I and do not exit in fall 2022 based on 2021-2022 data: These schools will have the opportunity to exit again in fall 2023 and fall 2024. For schools that do not exit in fall 2024 because they do not meet the exit criteria for such schools described in item A.4.viii.b., the school will be identified for comprehensive support and improvement.

Note: ESSA 20 U.S. Code § 6311 allows SEAs to determine the number of years a school can remain in ATSI status before it is identified for CSI. We would be changing this from three to four years for this subset of schools only.

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- ii.  The State is revising the statewide exit criteria for schools identified for additional targeted support and improvement under ESEA section 1111(d)(2)(C) in fall 2022 based on data from the 2021-2022 school year.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*

- iii.  The State is revising the State-determined number of years a school identified for additional targeted support and improvement in fall 2022 has to meet the statewide exit criteria in order to exit status before, for a school receiving Title I, Part A funds, it becomes a CSI school.

*If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*