

Required Action Districts Policy Update

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As part of school accountability, the Washington state legislature established a school turnaround policy called Required Action Districts. This brief outlines the background of this policy, the changes to administrative rules that were made in the spring of 2019, creation of a transitional process that was originally implemented during the 2019–20 school year called “Required Introductory Cohort,” and the activities and benchmarks for the districts identified as the Required Introductory Cohort as we move into WSIF Cycle 3 Identification.

Background

In 2010, Washington’s legislature passed a bill creating, in part, the Required Action District policy (RAD). The policy, codified under 28A.657 RCW, was developed on the premise that “For a specific group of persistently lowest achieving schools and their districts, it is necessary to provide a required action process that creates a partnership between the state and local district to target funds and assistance to turn around the identified schools.”

The statute outlines steps that the Office of the Superintendent of Public Instruction (OSPI) and the State Board of Education (SBE) must take to identify persistently lowest achieving schools, designate those schools’ districts as RAD, monitor and support the districts in turnaround efforts, and release districts from RAD status. In addition, the policy provides for an escalation of state intervention if, after three or more years of RAD status, there has not been adequate improvement.

Every Student Succeeds Act Impacts on RAD

When Every Student Succeeds Act (ESSA) replaced the No Child Left Behind Act in 2016, it changed, among other things, how state education agencies and local education agencies were held accountable for student outcomes. These changes included a significant philosophical shift away from what was considered a “name and blame” approach to accountability toward implementing a system of supports for schools struggling to improve student outcomes. Importantly, the data and processes used to measure school performance and identify schools most in need of improvement also changed.

These shifts highlighted the need to reconsider how the RAD policy was implemented so that it would be understood as a natural extension of the system and school improvement work under ESSA rather than a tangential and stand-alone accountability process divorced from other improvement efforts.



Changes to Administrative Rules Guiding Implementation

RAD Rule Changes July 2018 – May 2019

After considering pursuing legislation to revise the RAD statute, SBE and OSPI agreed in July 2018 to first update the administrative rules, or WACs (Washington Administrative Code), which describe how the RAD statute is implemented. Both SBE and OSPI have rule-making responsibilities under the RAD statute.

SBE and OSPI staff collaborated through the summer and fall of 2018 to draft amendments to both agencies' RAD rules. OSPI's rules focus on the statutory authority to identify persistently lowest achieving schools, recommending those schools' districts to SBE for required action, and recommending to SBE when districts should be released from RAD status. SBE's rules focus on statutory authority to designate districts as RAD, approve required action plans, release districts from RAD, and move districts to Level Two status.

The revised RAD rules were finalized after a public hearing and fully adopted in May 2019. A summary of the changes to how OSPI identifies and recommends districts for RAD status and release from RAD follows.

Revised Criteria for Designating and Recommending Required Action Districts

The RAD statute requires that OSPI identify "challenged schools in need of improvement" and a subset of those schools identified as "persistently lowest achieving schools." Districts with at least one persistently lowest achieving school may be identified as RAD.

The minimum statutory criteria for identifying **challenged schools in need of improvement** is the academic achievement of all students and disaggregated student groups, as measured by proficiency on the statewide assessments in ELA and math. In the revised rules, OSPI determined that challenged schools in need of improvement would be understood as schools identified for Tier III – Comprehensive Supports based on the Washington School Improvement Framework (WSIF). Starting in WSIF Cycle 2, a new subset of Tier III-Comprehensive Supports were identified as Tier 3 Plus, this group of schools were schools that were identified for back to back cycles of Tier III- Comprehensive Supports. This connection means that any school used to identify and designate a district as RAD will necessarily be a subset of the schools most in need of support. This achieves the goal of integrating the RAD policy into Washington's updated accountability and school improvement programming.

The minimum statutory criteria for identifying **persistently lowest achieving schools** is "lack of progress" for all students and disaggregated student groups. OSPI rules understand "lack of progress" to be captured in the metric of student growth as measured on the WSIF. Persistently lowest achieving schools are defined in rule as those in the lowest decile for combined growth and in the lowest decile for combined proficiency, as measured on the WSIF.

OSPI also determined the following factors must be considered when recommending districts to be designated as RAD:

The extent to which a persistently lowest achieving school serves student groups identified in the state's ESSA plan as needing the most support to meet 10-year goals for proficiency and graduation.

- The share of schools within a district that are identified for comprehensive or targeted supports.
- The amount of funding available to meet the improvement needs of the schools and districts identified.

Required Introductory Cohort introduced for the 2019-2020 School Year

During the May 2019 SBE board meeting and in an accompanying memo, OSPI recommended delaying the next round of RAD designation. Instead, OSPI recommended that the 2019–20 school year be a transition year, with designation of RAD resuming as defined in statute and rule in the spring of 2020. Contributing to this recommendation was the inability to meet the designation timeline outlined in both statute and newly adopted rule (which would have required a March 2019 designation by SBE) and the poor timing relative to school districts' budgeting and hiring processes.

In lieu of official RAD designation, OSPI outlined a plan to create a Required Introductory Cohort which would act as an on-ramp to RAD designation in March 2020. No formal action was required by SBE, but the board was amenable to this recommendation.

In the summer of 2019, OSPI used the identification process outlined in rule to identify a Required Introductory Cohort (RIC). This cohort of districts will each be designated as RAD in March of 2020.

The purpose of RIC is to build resources and supports for districts to engage in the effective, thoughtful, data-informed, and actionable planning for school turnaround activities that the RAD statute requires. OSPI will provide funding, in addition to Tier III – Comprehensive support funding, and additional access to improvement leaders during the 2019–20 school year.

Frontloading RIC districts with funding and supports in advance of their RAD designation will:

- expand a highly compressed audit and planning timeline so that districts and schools can develop a more effective and actionable required action planning;
- allow OSPI to more precisely fund the district when they become designated as RAD in March of 2020;
- nearly eliminate the possibility that the required action plan (due 40 days after designation) will be in dispute, avoiding costly delay to the start of full RAD implementation; and
- set the district up to begin full implementation when their full RAD funding is made available.

OSPI applied the RAD identification process as described in the revised rules to identify the RIC for the 2019–20 school year. The identified RIC districts received grant amounts ranging between \$70,000 and \$100,000 for the 2019–20 school year. Grant amounts were dependent on the size the school district, number of schools identified as persistently lowest achieving, and total student count within the identified schools.

The identified districts and schools engaged in the required elements of the academic performance audit (intensive comprehensive needs assessment) and the development of a meaningful required action plan. These districts and schools were officially moved to RAD status following the March 2020 SBE meeting.

These districts and schools have been receiving RAD supports. With the WSIF Cycle 3 identification in March 2024, there is an opportunity for current RAD schools to exit or move to level two status, and for a new Required Introductory Cohort to be identified.

Required Introductory Cohort for the 2024-2025 School Year

OSPI applied the RAD identification process as described in the revised rules to identify the RIC for the 2024-25 school year. The table below describes those steps and the resulting count of schools and/or districts at each step.

1. Identify "persistently lowest-achieving schools", which are schools designated as Tier 3 Plus schools during the WSIF Cycle 3 identification process. = 204
2. Identify Tier 3 Plus schools with a combined growth decile in the lowest 10%. = 24
3. Of the schools identified in Step 2, identify those schools with a combined proficiency decile in the lowest 10%. = 8 schools, 8 districts
4. Rank schools identified in Step 3 by the percent of identified schools in a district.
5. Rank schools by the number of service provision groups in a school with WSIF scores below the Title 1 identification threshold.

District Name	School Name	Prof Decile	Growth Decile	2023 Final Score	Schools' Identified %	Service Provision Groups below Title 1 Threshold	Low Income %	SWD %	English Language Learners %
Nespelem School District	Nespelem Elementary	1	1	1.1	100	3	97.7%	16.8%	8.4%
Mount Adams School District	Harrah Elementary School	1	1	1.25	100	3	99.2%	14.9%	47.1%
Wellpinit School District	Wellpinit Elementary School	1	1	1.45	75	3	88.1%	17.8%	34.3%
Marysville School District	Quil Ceda Tulip Elementary	1	1	1.4	69.6	3	58.3%	18.0%	12.3%
Shelton School District	Evergreen Elementary School	1	1	1.3	66.7	3	69.8%	16.4%	22.5%
Soap Lake School District	Soap Lake Middle & High School	1	1	1.8	66.7	3	90.2%	21.9%	23.8%
Kennewick School District	Amistad Elementary School	1	1	1.25	50	3	59.5%	13.6%	15.6%
Tacoma School District	Edna Travis Elementary School	1	1	1.45	49.2	3	56.7%	16.5%	10.3%

Mount Adams School District, Wellpinit School District, and Marysville School District are currently identified for RAD and OSPI is recommending they remain in RAD status.

RIC District and School Role Responsibility

The identified RIC districts will receive grant amounts of approximately \$100,000 for the 2024-25 school year. Grant amounts will be dependent on the size the school district, number of schools identified as persistently lowest achieving, and total student count within the identified schools.

The identified districts and schools are responsible to engage in the required elements of the intensive comprehensive needs assessment (academic performance audit) and the development of a meaningful required action plan. The required action plan must be in final draft form in advance of the April 2025 SBE meeting.

Intensive Comprehensive Needs Assessment (Academic Performance Audit- RCW 28A.657.040)

The RAD statute requires that an academic performance audit be conducted of the district and any school within the district identified as persistently lowest achieving. The audit will inform the required action plan the district will develop through the RIC planning year and submit to SBE for approval upon RAD designation.

In order to support the development of an effective and implementable required action plan, OSPI will organize the statutorily required academic performance audits in collaboration with each RIC district. The statute requires OSPI to contract with an external team to complete the audit. The audit team must consist of individuals with

expertise in comprehensive school and district reform. The audit team cannot include staff from OSPI or SBE or the school district subject to the audit.

The audit will include review and analysis of:

- existing school improvement plans and other district and school-level needs assessments and strategic plans;
- student demographics;
- mobility patterns;
- school feeder patterns;
- performance of different student groups on assessments;
- effective school leadership;
- strategic allocation of resources;
- clear and shared focus on student learning;
- high standards and expectations for all students;
- high level of collaboration and communication;
- aligned curriculum, instruction, and assessment to state standards;
- frequency of monitoring of learning and teaching;
- focused professional development;
- supportive learning environment;
- high level of family and community involvement;
- alternative secondary school best practices; and

- any unique circumstances or characteristics of the school or district.

Required Action Plan Development (RCW 28A.657.050)

The main output of the RIC award is a fully developed, well-informed required action plan which meets statutory requirements.

The required action plan must be developed in collaboration with administrators, teachers, other staff, parents, unions representing any employees within the district, students, and other representatives of the local community.

The contents of the plan must:

- describe how the district intends to address the findings of the academic performance audit in order to secure release from RAD status within three years of implementation;
- provide a description of a school improvement model that will be used by the district and any school identified as persistently lowest achieving;
- include separate plans for each school identified as persistently lowest achieving as well as a plan for how the district will support the schools collectively;
- provide a budget identifying resource needs to implement the plan;
- identify the changes to the district or school's existing policies, structures, agreements, processes, and practices intended to attain significant gains for all students enrolled in a persistently lowest achieving school.

If changes to terms and conditions of employment are necessary to implement a required action plan, the RAD statute requires that any collective bargaining agreement be re-opened or an addendum be developed and negotiated in order to make those changes (RCW 28A.657.050 (3)(a)). The statute outlines a process for resolving any disagreements between the district and the employee organizations.

Required Action Plan Submission

Upon RAD designation in April 2025, the school district has 40 calendar days to submit the required action plan to SBE for final approval (SBE rule, WAC 180-17-030). Before submitting the plan, the school board must conduct a public hearing to allow for comment on the proposed required action plan and must also submit the plan to OSPI for a final review ensuring consistency with federal and state guidelines (RCW 28A.657.050).

Office of System and School Improvement (OSSI) Roles and Responsibilities

Districts and schools engaged in the RIC process will be supported by staff from OSSI in addition to the existing Tier III – Comprehensive supports the schools are entitled to.

OSSI responsibilities to RIC districts and schools include:

- providing RIC grant funds;

- selection and management of the audit team responsible for the academic performance audit;
- coordination of existing system and school improvement activities to minimize duplication and fully leverage existing investments and resources;
- providing guidelines for the development of the required action plan;
- identification of research and evidence-based school improvement models that are approved for use in required action plans;
- providing OSPI resources in other areas, including teaching and learning, educator development and growth, special education services, student engagement and support, and special programs and federal accountability;
- convening of RIC districts and schools to share learning and leverage each other's experiences to strengthen required action plan development; and,
- progress reporting on behalf of RIC districts and schools to SBE.