

# Targeted and Comprehensive Support and Improvement

## Frequently Asked Questions

### Entrance and Exit Criteria

#### 1. How does a school become TSI or CSI?

The entrance criteria for TSI and CSI schools can be found in [KRS 160.346](#). The specific details are listed below:

Targeted Support and Improvement	
Tier I TSI Early Warning	Beginning 2020-2021: School has at least one subgroup whose performance in the state accountability system is at or below the summative performance of all students in any of the lowest-performing 10 percent of all schools for <b>two consecutive years</b> .
Tier II TSI Low Performance	Beginning 2018-2019: School has at least one subgroup whose performance in the state accountability system is at or below the summative performance of all students in any of the lowest-performing 5 percent of all schools.

Comprehensive Support and Improvement	
CSI I	Bottom five percent (5%) of all schools.
CSI II	A four-year graduation rate below eighty percent (80%).
CSI III	Identified for TSI II (lowest 5%) and fails to exit after three years.

#### 2. How does a school exit TSI or CSI status?

The exit criteria for TSI and CSI schools can be found in [703 KAR 5:280](#). The specific details are listed below:

Targeted Support and Improvement	
Tier I TSI Early Warning	Districts determine exit criteria, but at minimum must reflect the following: Schools will exit when the specific targeted subgroup(s) move(s) above the performance of all students in the bottom 10 percent of Title I schools or non-Title I schools within that range.
TSI II Low Performance	Schools will exit when the specified subgroup(s) move(s) above the performance of all students in the bottom 5 percent of Title I schools or non-Title I schools in comprehensive support and improvement (CSI I) and demonstrate continued progress on the data that served as a basis for identification.

Comprehensive Support and Improvement	
CSI I	Performance above the bottom 5 percent of Title I schools or non-Title I schools <b>AND</b> demonstrates continued progress on the data that served as the basis for identification.
CSI II	A graduation rate above 80 percent for Title I or non-Title I high schools <b>AND</b> demonstrates continued progress on the data that served as the basis for identification.
CSI III	All student group(s) performance is above all students in any of the lowest 5 percent of Title I or non-Title I schools <b>AND</b> demonstrates continued progress on the data that served as the basis for identification.

3. What happens if a school does not exit TSI or CSI status?

TSI and CSI schools are expected to make annual improvement. TSI Tier II schools that do not exit the status within three years become CSI schools. CSI schools that do not make annual improvement for two consecutive years or that fail to exit after three years will receive more rigorous intervention. The protocols for more rigorous intervention can be found in Section 10 of [703 KAR 5:280](#).

4. Where can I find the school rankings?

Under the new accountability system, schools are not ranked. Schools are identified for TSI or CSI based on an accountability profile that consists of three indicators. In order to be identified for TSI or CSI, the school must score below the established cut scores of all three indicators. [KRS 160.346](#). Those schools not identified as TSI or CSI are identified as “Other”.

5. If my school is identified for TSI under a subgroup that does not meet the minimum threshold for reporting the following year, is the school still considered TSI?

A school will not be identified or continue to be identified as TSI based on the performance of a subgroup that does not meet the minimum threshold for reporting.

6. Will KSB or KSD be identified as TSI or CSI?

Students enrolled at the Kentucky School for the Blind (KSB) of Kentucky School for the Deaf (KSD) are included in the accountability rating for their home school and district. As such, KSB and KSD cannot be identified for TSI or CSI.

7. What are the accountability cut scores?

The accountability cut scores are listed in the charts below.

Elementary	
Proficiency	60.5
Separate Academic Indicator	52.6
Growth	15.8

Middle	
Proficiency	62
Separate Academic Indicator	55
Growth	9.5

High	
Proficiency	40
Transition Readiness	41
Graduation Rate	85

8. Who determined the accountability cut scores?

The cut scores were determined through an established standard setting process. The committee was made up of a group of education professionals from a wide range of backgrounds and districts. The process was led by consultants from the Center for Assessment. This is the same process that has been used to establish other cut scores and accountability indicators in the past.

9. Is it possible to exit CSI and be identified as TSI?

It is possible that a school could exit CSI status and be identified as TSI the next year. CSI status is based on the "All Student" group, while TSI status is based on individual student sub-groups. It is possible that the "All Student" group could move above the cut scores while a single student sub-group remains below the cut scores.

10. If a high school is identified as CSI based on their graduation rate only, which indicators must be met to exit CSI status?

A high school identified as CSI for graduation rate is only required to increase their four-year cohort graduation rate above 80% to exit the status.

11. What is the soonest that we can exit CSI status?

Schools can exit CSI status as early as one year after identification.

12. What is considered annual improvement?

To exit CSI status, a school is required, under 703 KAR 5:280(15), to no longer meet the criteria for entrance and to demonstrate "continued progress" on the data used as a basis for identification.

## The School and District Audit

### 1. When is the school and district audit completed?

The school and district audit must be scheduled within forty-five (45) days of identification as CSI. Most school and district audits will take place in the spring of 2019. [703 KAR 5:280\(2\)](#).

### 2. Who can conduct a school or district audit?

The local board of education may choose to conduct a Request for Proposals (RFP) for an outside entity or use the Kentucky Department of Education to conduct their school and district audit. [703 KAR 5:280\(2\)](#).

### 3. What information is included in the school audit report?

Audit reports must include the following:

- diagnosis of the causes of the school's low performance;
- assessment and recommendation to the superintendent regarding the principal's capacity to function or develop as a turnaround specialist;
- assessment of the interaction and relationship among the superintendent, central office personnel, and school principal;
- recommendation of the steps the school may implement to launch and sustain turnaround; and
- recommendation to the local board of education of the turnaround principles and strategies necessary for the superintendent to assist the school with turnaround. KRS 160.346(6).

KDE also recommends audit reports include the following:

- analysis of state and local education data;
- a review of CSIP and other documents;
- interviews with students, parents, SBDMs (if applicable), school and LEA personnel and community members;
- direct observation;
- administration of teacher and principal working conditions surveys and student satisfaction surveys;
- SBDM meeting minutes and agendas, if applicable; and
- other information as deemed necessary by the commissioner. [703 KAR 5:280\(4\)](#).

### 4. What criteria is used to make leadership capacity recommendations?

For audit teams led by the Department, leadership capacity recommendations will be based on whether the principal or, in the case of a district audit, the district:

- Maintains and communicates visionary purpose and direction;
- Leads and operates the school under governance and leadership style that promotes and supports student performance and system effectiveness;

- Establishes a data-driven system for curriculum, instructional design and delivery
- Ensures systems are in place for accurate collection and use of data;
- Ensures systems are in place to allocate human and fiscal resources to support improvement and ensure success for all students; and
- Implements a comprehensive assessment system to guide continuous improvement. [703 KAR 5:280\(4\)-\(5\)](#).

5. What assurances are in place to ensure that the audit team is familiar with the nuances of subgroups, such as SPED and EL?

Audit teams must have documented expertise in diagnosing the causes of an organization's low performance and providing advice and strategies resulting in effective turnaround leadership. KRS 506.346(5). Further, audit teams directed by the department are made up of multiple individuals from diverse backgrounds and viewpoints, including a certified administrator, an LEA level administrator, a school improvement specialist, a teacher, a parent, and a higher education representative. [703 KAR 5:280\(3\)](#). KDE must approve or deny all non-department audit teams, and non-department audit teams must complete Kentucky-specific induction training. [703 KAR 5:280\(2\)](#).

6. How does a district declare their intent to use KDE or another entity for the audit or turnaround teams?

The school improvement regulation, [703 KAR 5:280](#), references a form that must be completed and submitted to KDE. This form is available on the KDE website for [Comprehensive Support and Improvement](#).

7. How soon must an audit occur after scheduling?

Audits must be scheduled within forty-five days from identification and will be completed in a timely manner thereafter.

8. When the regulations refer to the LEA, who is that referring to?

The term LEA is used to refer to the local school board.

9. Does KDE need some districts to choose other vendors due to capacity?

KDE is prepared to complete audits for every CSI school and its district. No school or district will be asked by KDE to pay for a non-department audit team.

10. Will district and school audits be concurrent?

KDE will work to ensure that audits conducted by KDE provide as minimal a disruption as possible. Where KDE is selected as the audit provider, district and school audits will occur at the same time and will be conducted by different teams; however, districts supporting multiple CSI schools may have individual school audits disbursed over several weeks.

LEAs choosing to use a non-department audit team should consult with the selected team regarding scheduling the district and school audits concurrently.

11. Are schools required to collect new stakeholder survey data for the audit? Can we use stakeholder survey data completed in the spring?

Pursuant to 703 KAR 5:280(4), KDE recommends that a school audit, in addition to the requirements established in KRS 160.346(6), include the administration of teacher and principal working conditions surveys and student satisfaction surveys. Where KDE is selected as the audit provider, schools will be required to collect new stakeholder survey data; however, KDE will work with schools that are currently undergoing AdvancED accreditation to ensure that duplicate surveys are not administered. Stakeholder surveys for district audits will be conducted in every school, not just in one or more CSI schools.

12. How much notice will we have before a KDE audit?

Where KDE is selected as the audit provider, KDE will give schools at least four weeks' notice before an audit. LEAs choosing to use a non-department audit team should consult with the selected team regarding scheduling the district and school audits.

13. How many years of documentation will the audit team be looking at?

The audit team will be reviewing the body of evidence provided by the school. Many factors contribute to the amount of documentation necessary to complete an audit (e.g. how long the principal has been at the school and whether or not the school has been identified under Priority status in the past). After the audit is scheduled, each school will participate in an individualized planning meeting to determine the scope of materials that should be provided.

14. If an audit team makes a recommendation that the principal does not have capacity, does the principal lose their job?

The superintendent retains hiring authority for each CSI school. After the recommendation is made, the superintendent may retain or reassign the principal. Tenure rules would still apply.

15. What does it mean when the regulation refers to "interaction among the Superintendent, central office staff, and the principal?"

KRS 160.346(6)(a) requires an audit report to include "an assessment of the interaction and relationship among the superintendent, central officer personnel, and the school principal." Where KDE is selected as the audit provider, the audit team will be looking at the way communication flows between the school and central office and will attempt to make a determination regarding the level of collaboration and cooperation.

16. What are some examples of other pieces of evidence that may be requested during an audit?

Where KDE is selected as the audit provider, the audit team may request access to past performance reviews, including but not limited to program audits, diagnostic reviews, two-day visits, and/or accreditation visits.

17. How long does it take to get the audit report back?

Following the completion of an audit, the audit team must submit findings and capacity recommendation(s) to the Commissioner of Education. Within 30 days of receiving the audit findings, the Commissioner will deliver those findings to the school and district. Where KDE is selected as the audit provider, a representative from KDE will deliver the audit findings to the superintendent and principal in person.

18. What do the leadership capacity recommendations look like?

Where KDE is selected as the audit provider, leadership capacity recommendations are delivered via a standardized form that is included in the final audit report.

19. Does the school board need to vote when we select our preferences for audit and turnaround team?

Yes, the LEA Notification of Non-Departmental Audit and Turnaround Team form should be completed based on the results of a vote of your local board of education. See KRS 160.346(5).

20. If we choose to use KDE for our turnaround and/or audit team, what expense does the district bear?

All KDE services are provided to schools and districts free of charge.

21. If there is more than one CSI school in a district, does the district need to submit an "LEA Declaration of Non-KDE Audit or Turnaround Team" form for each school? Does the decision have to be the same for each school?

Districts are required to submit a copy of the "LEA Declaration of Non-KDE Audit or Turnaround Team" form for each school identified for CSI in their district. The district is not required to use the same Turnaround Team option for each school.

## The Turnaround Process

### 1. Who writes the Turnaround Plan?

The Turnaround Plan is developed by the Turnaround Team. The school district has three options for developing a Turnaround Team; (1) complete a Request for Proposals (RFP) for a private entity, (2) utilize local staff or community partners, (3) utilize the services provided by KDE. [703 KAR 5:280\(7\)](#).

### 2. Who approves the Turnaround Plan?

The Turnaround Plan must be approved by the local Board of Education and the Commissioner of Education. [703 KAR 5:280\(7\)](#).

### 3. What information is included in the Turnaround Plan?

The Turnaround Plan shall include the following:

- Evidence-based interventions to increase student performance and address critical needs identified in the audit,
- A comprehensive list of people and entities involved in turnaround efforts and the roles they will play in that work, and
- A review of resource inequities that must include an analysis of school-level budgeting to ensure resources are adequately channeled toward school improvement. [703 KAR 5:280\(7\)](#).

### 4. What in-school support will a school receive?

The approved turnaround plan must be fully implemented by the first full day of the school year following the school year the school was identified for comprehensive support and improvement. KRS 160.346(7). If a district selects KDE to serve as the Turnaround Team, KDE field staff will be on hand to provide in-school support, professional development, and leadership coaching as needed to assist in fully implementing the approved turnaround plan.

### 5. What funding is available to assist schools in the turnaround process?

There are no state dollars available to assist in funding the turnaround process. Available federal dollars will be made accessible to CSI schools through a competitive grant making process.

### 6. If a school selects KDE as the Turnaround Team, who will be on the team?

In addition to KDE staff, the department will work with local leaders to establish a team that includes multiple local stakeholders, including an individual to provide school improvement assistance, a teacher, a principal, an LEA administrator, a parent, and a university representative as well as a chairperson that may or may not serve in addition to the six distinct members. See [703 KAR 5:280\(3\)](#).

7. Why are schools required to create a three year plan when they could exit after one year?

KDE utilizes a continuous improvement model that is rooted in sustainable improvements. Should a school exit after one year, the turnaround plan provides a firm foundation for continuous improvement planning in the future. Schools are encouraged to implement long-term solutions for long-term, sustainable change.

8. Will the department be partnering with Kentucky's Educational Cooperatives to assist with the Turnaround process?

KDE will be partnering with the Educational Cooperatives primarily to provide support to schools identified for TSI, although some of those regional trainings may be beneficial for CSI schools as well.

9. Will someone from KDE notify us if we need to make changes to our CSIP/Turnaround Plan?

KDE field staff will assist you with writing and updating your CSIP/Turnaround Plan to meet relevant or changing priorities.

## Advisory Leadership Team (ALT)

### 1. What happens to our SBDM Council?

Upon identification as a CSI school, the authority of the school's SBDM council is suspended and transferred to the Superintendent. [703 KAR 5:280\(8\)](#).

### 2. Do tenure rules still apply when making staffing decisions?

Yes, all tenure rules still apply when making staffing decisions.

### 3. How often does the Advisory Leadership Team meet?

The frequency of Advisory Leadership Team meetings should be determined by the school's principal in collaboration with the Turnaround Team. When held, meetings of the Advisory Leadership Team (ALT) must comply with Open Meetings laws in KRS Chapter 61. [703 KAR 5:280](#).

### 4. What are the responsibilities of the Advisory Leadership Team?

The Advisory Leadership Team must follow the same rules as SBDM councils regarding minority participation, open meetings, and open records. The team is responsible for providing support for systems that seek to build capacity in school leadership, promoting positive school climate and culture, and supporting the continual use of data-driven decision making and support to school improvement. [703 KAR 5:280\(8\)](#).

### 5. How is an Advisory Leadership Team formed?

The Advisory Leadership Team (ALT) represents school stakeholders, including school leaders, teachers, and parents, and is formed at the discretion of the principal with collaboration of the Turnaround Team. KRS 160.346(7)(g). In establishing the ALT, the principal of a school having eight percent or more minority students enrolled, as determined by enrollment the preceding October 1, must have at least one minority member serving on the ALT. 703 KAR 5:280(8).

### 6. Does the Advisory Leadership Team receive the same training as an SBDM council?

The Advisory Leadership Team (ALT) is not required to receive training. However, ALTs are still required to follow the same minority membership rules and open meetings/records rules as SBDM councils and should be familiar with those rules.

### 7. Does the Advisory Leadership Team in a CSI school have the same responsibilities an advisory school council had in a previously identified priority school (e.g. assisting with policymaking, hiring, etc.)?

The role of the Advisory Leadership Team (ALT) in a CSI school should be determined by the school's principal in collaboration with the Turnaround Team and may not have the same responsibilities previously delegated to an advisory school council in a priority school. By law, the ALT is responsible for the following: providing support for systems that seek to build capacity in school leadership; promoting positive school climate and culture; and supporting the continual use of data-driven decision-making to support school improvement. [703 KAR 5:280\(8\)](#).

8. The statute says that the council's authority is suspended, but does not say that the council itself is suspended. Does the council still exist?

No. Suspension of a council's authority equates to suspension of the council itself. Accordingly, the council no longer exists and has no legal authority or requirements. At the discretion of the principal, in collaboration with the Turnaround Team, some or all members of a suspended council may be asked to serve on an Advisory Leadership Team.

9. Are we required to report the members of our Advisory Leadership Team in the SBDM database?

Yes. The members of your Advisory Leadership Team (ALT) must be reported in the SBDM database.

10. Our school has begun the process of electing a new SBDM council, but we have not completed the process. What do we do?

Your school and district leadership should collaborate with your Turnaround Team to determine how and when your Advisory Leadership Team should be established. There is no need to continue to fill SBDM vacancies once the authority of the council is suspended.

11. When does a CSI school regain SBDM authority?

According to KRS 160.346(13), "A school's right to establish a council granted under KRS 160.345 may be restored by the local board of education two (2) years after the school exits comprehensive support and improvement status."

12. When do schools that were previously identified as priority schools regain council authority?

Schools that were previously identified as priority schools, but were not identified as CSI will regain council authority during the fall 2018 semester. The KDE SBDM Consultant will contact each school to assist in re-establishing a council.

### [Evidence-based Practices](#)

Schools are required to document Evidence-based Practices in their Turnaround Plans and school improvement fund applications. Please see the [Evidence-based Practices FAQ](#) for more information.

## Targeted Support and Improvement Questions

1. Should the evidence-based interventions documented in the CSIP be aligned with the identified subgroups?

Yes. Schools should align their interventions to the subgroups that were identified as the basis for identification.

2. How do we determine the level of improvement necessary to exit TSI status?

TSI status is based on the performance of a school's subgroups compared to all students in the lowest performing five percent (5%) of all schools. To determine the level of improvement necessary, you should compare the performance of your subgroup to the accountability cut scores established by the Department.

3. How does a TSI school become a CSI school?

A school identified as TSI Tier II (bottom 5%) that fails to exit the status after three years becomes a CSI school. In order to become a CSI school, the school must be identified for the same sub-group population three years in a row. If a school exits TSI status under one sub-group population and re-enters under a different sub-group population the following year, the three year count starts over.