Title I of the Every Student Succeeds Act (ESSA) requires the Nevada Department of Education (NDE) to identify low-performing schools for intervention. Unlike past federal school improvement efforts, however, the requirements provide NDE with significant flexibility and authority to design interventions.

In fact, Nevada has already begun to implement a series of reforms, enacted in 2015, that offer compelling strategies for state intervention in persistently low-performing schools. In light of this progress, there are four strategies that the state can use ESSA to expand and promote its approach:

1. **Ensure that districts’ school improvement plans include rigorous, evidence-based interventions.** This may include participation in the Zoom Schools program, which supports English language learners, and/or in the Victory Schools program, which provides supports to low-performing schools such as wraparound services and family engagement efforts.

2. **Use 7 percent of Title I funds to host a competitive grant targeting districts willing to implement rigorous, evidence-based interventions and districts that partner with the NDE to develop high-quality school leaders.** ExcelinEd offers several key design principles for competitive grants, which may also be used to support the Zoom and Victory programs.

3. **Increase school choice to address persistently low-performing schools.** This includes policies to support the success of Nevada’s Achievement School District (ASD) as well as encouraging charter school expansion, attracting high-quality charter operators and promoting community engagement.

4. **However Nevada moves forward with school interventions, several policies can enable school improvement across the board.** Policymakers should foster schools’ ability to hire and retain high-quality teachers and leaders by supporting high-quality educator pipelines and enabling performance pay, collect and distribute accessible and useful student achievement data, and promote integrated student services.

**SUMMARY OF ESSA INTERVENTION PROVISIONS**

In the transition to ESSA, the NDE must first develop an accountability plan. The department must submit the plan to the U.S. Department of Education in the early spring or fall of 2017. (See our ESSA Playbook on A-F School Accountability.)

Based on its accountability plan, the NDE will identify schools for **targeted and comprehensive support** during the 2017-18 school year and implement interventions in the 2018-19 school year.
ESSA REQUIREMENTS FOR TARGETED SUPPORT AND COMPREHENSIVE SUPPORT SCHOOLS

**Targeted Support**

**Identification:** Schools that have at least one subgroup of students that are “consistently underperforming,” as defined by the state.

**Requirements for Intervention:** Targeted support schools must develop and implement plans to improve student outcomes in the identified subgroup. The district (not the state) approves and monitors the plans. In addition, if any school identified for targeted support has a subgroup performing as poorly as the bottom 5 percent of Title I schools in the state, the NDE must assess the allocation of resources and address inequities.

**Exit Criteria:** The NDE must set exit criteria for schools in targeted support. If a school does not meet those criteria within a state-determined number of years, the school transitions to comprehensive support.

**Key Role of the NDE:** Assess allocation of resources, set exit criteria and shift persistently underperforming targeted-support schools to comprehensive-support status.

**Comprehensive Support**

**Identification:** Schools performing in the lowest 5 percent statewide, have a four-year graduation rate of less than 67 percent, or have a subgroup performing as poorly as the lowest 5 percent of schools in the state and has not improved with targeted support.

**Requirements for Intervention:** Districts must develop and implement improvement plans for schools identified for comprehensive support. The plans must include evidence-based interventions; identify resource inequities; be informed by all indicators in the state’s accountability system; and be approved by the school, district and the NDE. The NDE must monitor and periodically review district improvement plans, and set the criteria for schools to exit comprehensive support.

**Exit Criteria:** The NDE must set exit criteria for schools in comprehensive support. If the exit criteria are not satisfied within a state-determined number of years—not exceeding more than four years—the NDE must take more rigorous actions.

**Key Role of the NDE:** Encourage the adoption of evidence-based intervention strategies; review district plans for school improvement and monitor implementation; and design and implement more rigorous actions for schools that do not improve over time.
NEVADA’S ROLE IN SCHOOL TURNAROUND UNDER ESSA

Under ESSA, states have a limited role targeted support schools, but they can significantly influence interventions for schools in comprehensive support and for persistently low-performing schools. This state influence is possible because, under ESSA, states are freed from the federally prescribed intervention models that were required under No Child Left Behind (NCLB), the previous version of the law.

ESSA gives Nevada the opportunity to exercise this influence through the following key state actions:

**KEY STATE ACTION #1:**
Encourage the Adoption of Aggressive Intervention Strategies.

The reform package that policymakers enacted in 2015 has given Nevada a significant head start. For instance, the Zoom Schools program provides additional programs and services for English language learners. The Victory Schools program focuses on ensuring that persistently low-performing schools have a comprehensive diagnosis of their issues, support from external organizations as needed, locally owned implementation and a strong accountability role for the NDE. Given ESSA’s emphasis on evidence-based interventions, both the Zoom and Victory programs are accompanied by independent evaluations of their effectiveness.

ESSA requires the NDE to recommend evidence-based practices to districts and to review, approve and monitor the implementation of districts’ school improvement plans. This authority provides the state with significant leverage to encourage aggressive interventions across all schools in comprehensive support. In addition to the Zoom and Victory programs (which have produced promising early results), it may prove beneficial for the NDE to issue a list of approved school interventions and apply high standards for approving districts’ school improvement plans.

**Evidence for Successful School Interventions**
Despite decades of efforts to improve persistently low-performing schools, there is a limited body of rigorous research on their success. Moreover, the existing research has drawn mixed conclusions. Yet several studies find that the least intrusive interventions—such as
developing teacher effectiveness or redesigning instructional programs—have had little to no impact on student achievement when implemented in isolation. On the other hand, some research suggests that student outcomes have improved under more transformative interventions—such as replacing school staff, restarting the school as a charter school or closing the school and enrolling students in higher-performing schools. As a result, the NDE should consider using its review of district school improvement plans to encourage the adoption of the most transformative interventions.

Several of these transformative interventions bear a close resemblance to several of the options provided under the Obama administration’s School Improvement Grant (SIG) program. The SIG program has not produced the hoped-for results, but it is important to note that nearly three-quarters of grantees chose to implement less aggressive reforms under SIG’s “school transformation” model. The 26 percent of SIG grantees using the more transformative interventions (i.e., replacing staff, charter takeover and closure) showed more promising improvements in student outcomes.

<table>
<thead>
<tr>
<th>SCHOOL INTERVENTION</th>
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<tr>
<td><strong>Models</strong></td>
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<td>#1 — Replacing principal and significant percentage of staff.</td>
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<tr>
<td>Evidence: A study of SIG-funded school reforms in California found that schools that implemented reconstitution (which SIG calls “turnaround”) showed significant improvement in student achievement relative to counterparts using more moderate school improvement models.</td>
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<tr>
<td>#2 — Restart as a charter: Close the school and restart it under the management of a charter school operator, a charter management organization (CMO) or an educational management organization (EMO).</td>
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<tr>
<td>Evidence: As part of the School District of Philadelphia’s Renaissance Schools Initiative, the CMO Mastery Charter Schools closed and reopened six low-performing schools—three elementary and three middle/high. The CMO enrolled the same students, but with different leadership and staff. Since the restart in 2010, Mastery’s takeover schools have seen progress in student achievement results and increased college-going rates; the schools now</td>
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draw more demand from the local community.\textsuperscript{vii}

\textbf{#3 — Close and consolidate}: Close the school and enroll its students in higher-performing schools in the district.

\textbf{Evidence}: A study of 18 school closings in Chicago found that students who transferred to the strongest receiving schools experienced an achievement gain of nearly one month in reading and more than two months in math. Research in Ohio and New York also show positive results.\textsuperscript{viii}

\begin{itemize}
  \item Julie Corbett, “Chartering Turnaround: Leveraging Public Charter School Autonomy to Address Failure,” 2015, National Alliance for Public Charter Schools.
\end{itemize}

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\textbf{KEY STATE ACTION #2:} & \textbf{Distribute Federal Funds to Push Districts Toward More Rigorous Interventions and Developing High-Quality School Leaders.} \\
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The second strategy to encourage districts toward proven, rigorous interventions includes using NDE’s distribution of federal funds.

ESSA provides states with significant resources to support bold interventions. Nevada will receive an estimated $123 million in Title I dollars in fiscal year 2017. The NDE holds the purse strings on Title I funding (see distribution of Title I funding) and can influence school interventions in two ways.

First, the NDE must reserve 7 percent of Title I funds ($8.6 million) for school interventions; the NDE can distribute these funds by formula to all districts serving the lowest-performing schools or use a competitive grant program to fund districts that are able and willing to implement rigorous reforms. The NDE could also use the competitive grant program for districts to partner with the department on elements of the Victory Schools program. These elements could include a leadership network to support school leaders, full-day kindergarten, incentives for hiring and retaining teachers or family engagement efforts. For schools struggling to serve English language learners, the competitive grant could be used to incentivize participation in the Zoom Schools program as well.

Second, the NDE may reserve another 3 percent of Title I funds ($3.7 million) to support a similar grant for direct student services, such as personalized learning, transportation to support school choice or other student supports.\textsuperscript{ix}
However the NDE directs this funding, a few design principles will help ensure the competitive grant has its intended effect:

**Leave Room for Local Ownership and Innovation:** Applications for both federal and state competitive grants often include an extensive list of detailed requirements. As a result, winning a grant can become a competition more about checking all the boxes than about the potential of an applicant’s plan. The NDE should consider allowing districts to retain ownership over their plans. For example, rather than requiring specific approaches to school leadership, the NDE could create a list of approved programs, require districts to select a program from the list and leave it to the district to determine and adjust to meet the program’s specific needs.

**Create a Bright Line Between Oversight and Operation:** The NDE is responsible for designing and administering the grant competition, evaluating proposals and holding districts accountable for implementation. Unfortunately, it is difficult for any SEA to hold a grantee accountable while simultaneously offering technical assistance to that grantee. The NDE can enable schools to access high-quality support from qualified independent organizations by providing directly for the support. At a minimum, the NDE should consider creating firewalls between the offices charged with implementation support and oversight.

**Require Rigorous Evaluations:** Too often, professional development and school improvement are deemed a success or a failure without a methodologically sound evaluation or consideration of other outcomes. It is essential to invest in developing a rigorous understanding of when and how efforts succeed. The NDE should ensure that grants require a high-quality evaluation through partnership with external providers such as institutions of higher education.

**Set and Enforce Strong Accountability:** Strong accountability is the linchpin of a competitive grant; without it, applicants may shy away from promising reforms they think are too disruptive, have unrealistic timelines for implementation or set unattainable goals for
improvement. However, applicants who anticipate consequences for falling short will be more likely to temper their promises accordingly. The NDE must be willing to withhold grant funds if a district fails to meet key milestones and to implement more rigorous interventions when reforms are not successful.

**KEY STATE ACTION #3:**
Increase School Choice to Address Persistently Low-Performing Schools.

For schools that do not improve after four years in continuous improvement, ESSA requires states to take more rigorous actions. The expectation is that interventions will start in the 2018-19 school year and that a school’s four years will conclude at the end of the 2021-22 school year. However, nothing in ESSA prevents states from intervening in persistently low-performing schools before then. Many schools lingered in “restructuring” under the NCLB Act, in “priority status” under the ESEA waivers and are now likely to enter “comprehensive support” under ESSA.

Nevada’s Achievement School District (ASD) provides a promising option for these schools that fail to improve. But the NDE and charter authorizing entities can choose to take the following steps to strengthen the ASD and create additional high-quality options for all students:

**Adequately Fund and Staff the ASD:** The ASD cannot succeed in the long term without adequate resources. Currently, the ASD does not have the budget to hire necessary staff and build capacity before receiving its first schools. Therefore, state legislators should consider adequately funding the ASD with public resources, perhaps through a combination of an authorizing fee and a budget line item. The percentage-based funding will help ensure that the turnaround district’s capacity grows as it expands to serve more students, while a budget line item can help the turnaround district hire and build before new needs emerge rather than in reaction to them.

**Foster Strong Authorizing and Accountability Practices:** The charter sector is based on a grand bargain in which schools have autonomy in exchange for accountability. Authorizers are often a critical player in maintaining this balance. According to the National Association of Charter School Authorizers (NACSA), there are four active authorizing bodies in Nevada: Carson City School District, Clark County School District, Nevada State Public Charter School Authority and Washoe County School District. These authorizers should each work to implement all of NACSA’s recommended practices.
Attract High-Quality Charter Management Organizations: The nation’s best CMOs have enormous potential to drive the expansion of high-quality charter schools. They currently serve more than 300,000 students across the country and generally outperform nearby schools, especially in urban districts. Nevada has already taken concerted actions to attract the best CMOs to Nevada. For example, the Nevada-based nonprofit Opportunity 180 launched in 2015 with the express mission of opening and supporting high-performing schools. This organization: helps attract high-performing CMOs; incubates new schools; identifies and develops new school leaders; helps engage families; and supports charters’ access to affordable school facilities. It would likely prove beneficial for the NDE to continue to leverage its partnership with Opportunity 180 to support the work of the ASD and coordinate to submit an application for the next round of the federal Charter Schools Program grant.

Leverage Direct Student Services to Facilitate Access to Choice: The NDE can choose to reserve 3 percent of Title I funds and direct them toward state-determined student services in districts with significant proportions of schools in comprehensive support. The NDE should consider using these funds to support the unique needs of rural schools. The NDE can target funds to rural districts that provide students with online access to a greater variety of courses, including credit-recovery options. Alternatively, the NDE can use funds to support efforts in every district to ensure each student has access to a guidance counselor to help him or her navigate the transition from high school to college or a career.

Ensure Authentic Community Engagement When Schools Open and Close: Strong community engagement is crucial to the long-term success of new school options and helps ensure that any school closures minimize the cost to communities’ unique cultures and social capital. Authorizers and the NDE should promote community engagement by requiring new schools to address their community engagement strategies in their charter applications, holding public hearings on all school closure decisions and disseminating strategies for authentic community engagement.

COMMUNITY ENGAGEMENT: RESOURCES

Partners

- **Democracy Builders** helps engage parents in the school choice movement. In addition to helping schools engage with their parent communities, Democracy Builders provides parents with advocacy training and helps bridge the gap between parents and policymakers.

- **Families Empowered** was founded specifically to support families in systems of school choice by providing resources and information throughout the school application process for families stuck on waitlists.

- **Stand for Children** is a national advocacy organization that includes family engagement and organizing as one of its key strategies for supporting school improvement. It has created **Stand University for Parents** (Stand UP) to help parents get involved in their children’s education.

Research and Analysis

Beyond competitive grants and leveraging the power of school choice, the following policies may help to create the statewide conditions necessary for school improvement:

**Staff Quality and Support:** Schools’ ability to recruit and retain effective teachers has a significant impact on school quality. Strong instructional leadership from the principal and district support can also produce positive results. The NDE should consider investing in improving districts’ ability to hire and retain high-quality teachers and school leaders.

The following are potential strategies for the NDE that may be beneficial:

- **Provide guidance to district leaders** on how to use various funding streams, including federal dollars from Title II of ESSA, to provide hiring and retention incentives for high-quality teachers.
- **Collect and report data** on the effectiveness of teachers and leaders from various programs and consider closing ineffective programs.
- **Require or incentivize teacher preparation programs** to emphasize clinical experience.
- **Ensure that principal preparation programs provide better training** on budget management, human resources, community engagement, and using data to drive instructional improvement.
- **Build or recruit high-quality alternative preparation programs.**

**High-Quality Data and Reporting:** Data-driven decision making at the state, district and school levels is a common strategy in successful school turnaround efforts. This is an especially important strategy for the NDE’s efforts to support principal leadership and development because data is essential to any effort to assess and address school improvement needs. High-quality and accessible data on school performance also helps parents make informed choices for their children.

- **The NDE should consider designing its data systems to include rich school-level data.** This would include student performance data on state assessments and end-of-course exams, suspension rates and teacher quality. State-level data platforms should provide educators with timely, meaningful and accessible information about student and school performance and progress. These platforms should also provide parents with clear and concise summaries of school quality (see our ESSA Playbook on A-F School Accountability).

**Integrated Student Services:** Struggling schools, students and families often have additional health, emotional and behavioral needs but have trouble effectively accessing the maze of public and private services in the community. Organizations like Communities in Schools work in conjunction with other transformative reforms to help ensure students can access the supports and opportunities they need to be successful in the classroom. Fifty-eight schools in Nevada already receive support from Communities in Schools, but even more schools could benefit from its assistance.
The NDE can encourage more schools and districts to partner with organizations like Communities in Schools, which can help ensure students receive the wraparound services they need to succeed.

WHAT’S NEXT?

Nevada’s 2015 reforms provide a solid foundation on which to build meaningful interventions—and successful outcomes—for persistently low-performing schools. Between the Zoom and Victory School programs, the Achievement School District and additional support for school leaders, struggling schools in Nevada have promising resources available to help them transform. State-level flexibility under ESSA also allows Nevada policymakers at the NDE and in the legislature to grow these efforts.

Nonetheless, with a series of fairly recent reforms and a new set of criteria for school interventions under ESSA, the NDE will need to clearly align its existing plans for school interventions with the requirements under ESSA, and communicate effectively and consistently with districts and schools. Moreover, while Nevada policymakers and practitioners focus on implementing interventions for persistently low-performing schools, they must not neglect the importance of supporting the creation of new high-quality schools of choice.

TEACHER AND LEADER PIPELINES: RESOURCES

Partners

- TNTP is a nonprofit organization that supports districts and charters in effective talent management—from classroom support to district-level functions. TNTP also operates alternative teacher preparation programs for career switchers.
- In addition to traditional school leader preparation, a number of nonprofits, including Building Excellent Schools, New Leaders, Fisher and Miles Family Fellowship and the Ryan Fellowship, train school leaders

Research and Analysis

- The National Council on Teacher Quality has developed recommended state policies for teacher preparation; its sister organization, Teacher Prep Inspection-US, helps teacher prep programs identify and address their challenges.
- TNTP has authored a number of influential reports on teacher policies, including teacher evaluation, compensation, retention and professional development.
Since the reauthorization of the Elementary and Secondary Education Act in 2001 (No Child Left Behind), there has been concentrated focus on turning around low-performing schools. However, amid the policy attention, research on the implementation and effects of school turnaround efforts remains limited. Nonetheless, the existing research informs our recommendations on intervention options.


The School Improvement Grant (SIG) required that 50 percent of teachers be replaced. There is no evidence that replacing one-half of the staff is the right amount needed for successful turnaround efforts. What is important is that districts have aligned incentives so that they are sufficiently aggressive with an appropriate proportion of teacher replacement and that the state enforces consequences if districts fail to improve.


