

# Prioritizing School Integration in ESSA State Implementation Plans

Issue Brief **6**

## Background

The Every Student Succeeds Act (ESSA) is the latest reauthorization of the country's premier K-12 education law, the Elementary and Secondary Education Act.<sup>1</sup> Under ESSA state education agencies (SEAs), along with local education agencies (LEAs) and the communities they serve assume significant new responsibilities, ranging from the formulation of state accountability systems to determining interventions in persistently low-performing schools. ESSA also includes the requirement that state and local education agencies engage in "timely and meaningful consultation" with a variety of stakeholders while developing many aspects of Title I plans and school accountability systems.

This issue brief summarizes opportunities for supporters of school diversity to engage in the ESSA implementation process at the state and local level to maximize the potential school integration impact of the new law.

## Two Opportunities to Promote School Diversity in State ESSA Plans

Under ESSA, state-based advocates have the opportunity to support state accountability systems and Title I plans that will encourage greater racial and economic integration in public elementary and secondary schools.

### 1. State Accountability Metrics.

ESSA requires that SEAs develop four different accountability indicators for elementary and middle schools, and high schools. The **fourth** indicator for both elementary/middle and high schools gives states significant flexibility for adding their own metrics to the state accountability plan. This indicator is required to have the following characteristics:

- it must allow for meaningful differentiation in school performance,
- it must be valid, reliable, comparable, and statewide, and
- it may include any measure that meets the above two requirements.

Given the significant body of research supporting the importance and effectiveness of socioeconomic and racial integration in schools,<sup>2</sup> the NCSD believes that SEAs should include progress toward racial and socioeconomic integration as the fourth prong of accountability systems. An example of information collection methods regarding diversity metrics exists in New York City, where in December 2015 the NYC Department of Education made its first annual school diversity accountability report.<sup>3</sup>

### 2. Title I Interventions.

Under ESSA, LEAs are required to consult with local stakeholders to develop evidence-based Title I

1 Every Student Succeeds Act, Pub. L. No. 114-95, available at <https://www.congress.gov/114/bills/s/1177/BILLS-114s1177enr.pdf>.

2 See <http://school-diversity.org/research-briefs/> for current research regarding the benefits of racial and socioeconomic integration for all students.

3 See Patrick Wall, "City took steps to boost academic diversity in 2015, new report shows," Chalkbeat New York (December 2015), available at <http://ny.chalkbeat.org/2015/12/31/city-took-steps-to-boost-academic-diversity-in-2015-new-report-shows/>

interventions to be implemented at identified low performing schools.<sup>4</sup> Starting with the Coleman Report in 1966, a significant body of research has developed over the past five decades which consistently shows the powerful positive impacts of racial and socioeconomic integration in schools. The U.S. Department of Education has already concluded that federal funds under the School Improvement Grants (SIG) program can be used to promote school diversity. Now that the SIG program has been folded back into Title I, advocates can use the SIG precedent to urge states to earmark some of their Title I funds for integration as well. Advocates can take lessons gleaned from other efforts to foster diversity, such as the Socioeconomic Integration Pilot Program in New York,<sup>5</sup> to further develop interventions appropriate for schools in their LEA.

Additionally, SEAs also play a limited role in developing Title I interventions. For instance, SEAs may establish alternative evidence-based interventions for use by LEAs in identified schools, and if an identified school does not make adequate improvement in a set amount of time, the school is subject to more rigorous interventions determined by the state. Furthermore, in LEAs with a significant number of identified schools, SEAs may take action in addition to LEA interventions.

## **Opportunities to Influence State and Local Plans**

Integration advocates can reach out to their state and local education leaders using the accompanying sample letter to request involvement in developing state accountability plans and Title I interventions. Justification for the involvement of advocacy organizations, derived from the text of ESSA, is provided below.

### **1. Collaboration Required in Developing State Accountability Plans.**

Section 1111(c)(4) of ESSA requires states to submit accountability plans developed by the SEA in order to receive Title I funds. ESSA requires that state accountability plans be developed in collaboration with a variety of stakeholders.<sup>6</sup> While civil rights organizations are not specifically listed among the groups that must be consulted during the development of these plans, they are not barred from the conversation. In fact, because accountability plans must be approved by the U.S. Department of Education, and as a condition of their approval must undergo peer-review by a team selected by the Secretary which includes civil rights researchers and experts,<sup>7</sup> we believe the inclusion of civil rights organizations in the development of these plans would be in the best interests of SEAs. If your

4 *Supra* note 1 at 289-290. Under ESSA, the term “evidence-based,” when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on: strong evidence from at least 1 well designed and well-implemented experimental study; moderate evidence from at least 1 well designed and well-implemented quasi-experimental study; or promising evidence from at least 1 well designed and well-implemented correlational study with statistical controls for selection bias.”

5 For more information see New York State Education Department, “2015-18 Title I School Improvement Section 1003(a): SOCIOECONOMIC INTEGRATION PILOT PROGRAM,” *available at* <http://www.p12.nysed.gov/funding/2015-18-title-1-ses-integration-grant/home.html>

6 *Supra* note 1 at 19. Under ESSA Section 1111 (State Plans) in order to receive Title I grants states must submit plans developed by the SEA with “timely and meaningful consultation with the Governor, members of the State legislature and State board of education (if the State has a State board of education), local educational agencies (including those located in rural areas), representatives of Indian tribes located in the State, teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents.”

7 For purposes of reviewing state plans, the Secretary of Education will establish peer-review teams consisting of parents, teachers, principals and other school leaders, specialized instruction personnel, SEAs, LEAs, and the community (including businesses), as well researchers familiar with the implementation of academic standards, assessments, and accountability systems, as well as researchers familiar with

group is excluded from participation in the development of the accountability plan, you should complain directly to the Office of Civil Rights at the U.S. Department of Education.

## 2. Collaboration Required in Developing Title I Interventions.

Similar to the collaboration requirements for developing state accountability plans, LEAs must, with the input of stakeholders, “locally develop and implement a comprehensive support and improvement plan for the school to improve student outcomes”<sup>8</sup> for:

- schools that have been determined to be within the lowest-performing 5% of elementary and middle schools,
- high schools with graduation rates at or below 67%, and
- schools with subgroups performing at same level of bottom 5% of schools that don’t improve in state-set period of time.

Schools in which subgroups of students have been identified as consistently underperforming must first implement school-level targeted interventions, developed with input from stakeholders, before moving on to comprehensive interventions if subgroup performance does not improve. If a school is subject to these targeted interventions, the LEA will be required to identify resource inequities, which can include a review of LEA and school-level budgeting. Targeted interventions developed by LEAs must address resource inequities identified in these schools, which gives proponents of

diversity an opportunity to emphasize the many ways in which racial and socioeconomic integration can equalize access to resources for students at struggling schools.<sup>9</sup> State-based civil rights advocacy organizations belong in the stakeholder category, and should therefore be included in the local groups developing the comprehensive and targeted Title I interventions.

While there is no requirement that SEAs must consult stakeholders in developing state-determined Title I interventions, state-based civil rights advocacy organizations should offer their expertise to SEAs as well.

## 3. Other Opportunities to Support School Diversity

Part A of Title IV in ESSA focuses on student support and academic enrichment, and requires states to submit plans that include assurances that the state will “provide for equitable access for all students to the activities supported by this subpart.”<sup>10</sup> Acceptable activities for the funds include supporting local educational agencies in providing programs and activities that offer well-rounded educational experiences to all students, including female students, minority students, English learners, children with disabilities, and low-income students.

Part A funds can be used to ensure the aforementioned groups have increased access to high-quality courses in science, technology, engineering, and mathematics; activities and programs in music and the arts; foreign languages; accelerated learning

how to meet the needs of disadvantaged students, children with disabilities, and English learners, the needs of low-performing schools, and other educational needs of students. See *supra* note 1 at 20.

8 *Supra* note 1 at 37

9 “[I]ntegrating schools leads to more equitable access to important resources such as structural facilities, highly qualified teachers, challenging courses, private and public funding, and social and cultural capital.” Amy Stuart Wells, Lauren Fox, and Diana Cordova-Cobo, *How Racially Diverse Schools and Classrooms Can Benefit All Students*, (April 9, 2016), The Century Foundation, available at <https://tcf.org/content/report/how-racially-diverse-schools-and-classrooms-can-benefit-all-students/>.

10 *Supra* note 1 at 170

programs; and any other courses, activities, and programs or other experiences that contribute to a well-rounded education. Part A funds can also be used to expand access to school-based counseling and mental health programs. All of the programs which Part A funds support would be served through racial and socioeconomic integration, which would give formerly isolated low-income and minority students access to the aforementioned resources.

LEAs must submit applications to receive Title IV Part A funds. In crafting their applications, ESSA requires LEAs to consult stakeholders, specifically including “community-based organizations” such as civil rights groups and grassroots advocacy

organizations.<sup>11</sup> In consultation with stakeholders, LEAs are required to draft applications that include goals for the funds, as well as an account of how LEAs’ efforts will be evaluated. LEA applications must also provide assurances that the Part A funds will prioritize in-need schools, specifically including those schools implementing targeted and comprehensive Title I school improvement plans.

Diversity advocates should take this opportunity to emphasize how LEAs can meet the Title IV Part A goals of school improvement, provision of well-rounded educational opportunities,<sup>12</sup> and activities to support safe and healthy students<sup>13</sup> by fostering racial and socioeconomic integration in targeted schools.<sup>14</sup>

11 *Supra* note 1 at 174

12 *Supra* note 1 at 176.

13 *Supra* note 1 at 177.

14 *Supra* note 9. For a summary of this research, see also Susan Eaton, “School Racial and Economic Composition & Math and Science Achievement,” (National Coalition on School Diversity, 2011), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo1.pdf>; Susan Eaton, “How the Racial and Socioeconomic Composition of Schools and Classrooms Contributes to Literacy, Behavioral Climate, Instructional Organization and High School Graduation Rates,” (National Coalition on School Diversity, 2011), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo2.pdf>; Roslyn Mickelson, “School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence,” (National Coalition on School Diversity, 2015), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo5.pdf>.

## Appendix (sample letters to your state and local education agencies)

Editable Word versions of these letters are available at <http://school-diversity.org/highlights-from-state-and-local-campaigns/sample-essa-letters-to-education-leaders/>

### Sample Letter to Local Education Leader

Dear NAME,

As a civil rights organization, **ORGANIZATION NAME** has been pursuing the fight for equitable schools in **CITY/STATE/OUR COMMUNITY** for over **YEARS OF OPERATION**. **BRIEF ORGANIZATIONAL BACKGROUND, SUMMARY OF EDUCATION WORK**. As a member of the National Coalition on School Diversity (see [school-diversity.org](http://school-diversity.org)), we believe that integration by race and socioeconomic status is one of the most important steps **LEA** could take under the Every Student Succeeds Act (ESSA), and implore **the LEA** to seriously consider:

*Including Strategies for Fostering Racial and Socioeconomic Integration as Evidence-Based Title I Interventions.* Studies consistently show that racially, culturally, and economically diverse schools are strongly associated with a range of short and long term benefits for all racial groups.<sup>1</sup> This includes gains in math, science, reading, and critical thinking skills and improvements in graduation rates.<sup>2</sup> Research also demonstrates that diverse schools are better equipped than high-poverty schools to counteract the negative effects of poverty.<sup>3</sup> Over the long-term, students who attend diverse schools are more likely than students from homogeneous schools to choose diverse colleges, neighborhoods, and workplaces later in life.<sup>4</sup> They possess better critical thinking skills and analytical ability and are more likely to form cross-racial friendships.<sup>5</sup> In light of the numerous benefits associated with diverse, integrated schools, LEAs should consider programs designed to foster greater integration as evidence-based Title I interventions.

*Including Strategies for Fostering Racial and Socioeconomic Integration in Applications to Receive Funds Under Title IV Part A.* Title IV Part A funds are provided to LEAs to ensure targeted groups, including minority and low-income students, have access to high quality course offerings in STEM, music, art, foreign languages, and other hallmarks of a well-rounded education. Additionally, these funds are to be used to support a positive school climate and foster improved mental health. All of the goals under Title IV Part A would be well served by racial and socioeconomic integration, as recent research illustrates that students in integrated schools have access to a broader range of high-quality course offerings and supportive school climates.<sup>6</sup>

ESSA includes the requirement that local education agencies engage in “timely and meaningful consultation” with a variety of stakeholders while developing many aspects of Title I intervention plans and Title IV Part A applications. As a group deeply concerned about equity in education, we ask to be included as a stakeholder in your planning for ESSA implementation. Specifically, we request the involvement of **PERSON(S)** from our organization during **the LEA’s** consultations regarding Title I intervention development and Title IV Part A applications.

Thank you for your consideration.

Sincerely,

[**ORGANIZATION PRESIDENT/CEO**]

- 1 For a summary of this research, see Roslyn Mickelson, “School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence,” (National Coalition on School Diversity, 2015), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo5.pdf>; Genevieve Siegel-Hawley, “How Non-Minority Students Also Benefit from Racially Diverse Schools,” (National Coalition on School Diversity, 2012), available at <http://school-diversity.org/pdf/DiversityResearchBriefNo8.pdf>.
- 2 For a summary of this research, see Susan Eaton, “School Racial and Economic Composition & Math and Science Achievement,” (National Coalition on School Diversity, 2011), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo1.pdf>; Susan Eaton, “How the Racial and Socioeconomic Composition of Schools and Classrooms Contributes to Literacy, Behavioral Climate, Instructional Organization and High School Graduation Rates,” (National Coalition on School Diversity, 2011), available at <http://schooldiversity.org/pdf/DiversityResearchBriefNo2.pdf>.
- 3 For a summary of this research, see Philip Tegeler, Roslyn Mickelson, and Martha Bottia, “What We Know about School Integration, College Attendance, and the Reduction of Poverty,” (National Coalition on School Diversity, 2011), available at <http://schooldiversity.org/pdf/DiversityResearchBriefNo4.pdf>.
- 4 For a summary of this research, see Susan Eaton and Gina Chirichigno, “The Impact of Racially Diverse Schools in a Democratic Society,” (National Coalition on School Diversity, 2011), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo3.pdf>
- 5 *Supra* note 1.
- 6 Amy Stuart Wells, Lauren Fox, and Diana Cordova-Cobo, *How Racially Diverse Schools and Classrooms Can Benefit All Students*, (April 9, 2016), The Century Foundation, available at <https://tcf.org/content/report/how-racially-diverse-schools-and-classrooms-can-benefit-all-students/>.

## Sample Letter to State Education Leader

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*Including Progress Toward Racial and Socioeconomic Integration as a Factor in the Statewide Accountability System.* A significant body of evidence indicates that racial segregation and poverty concentration are systematically linked to unequal educational opportunities, and are “strongly related to an array of factors that limit educational opportunities and outcomes....[including] less experienced and less qualified teachers, high levels of teacher turnover, less successful peer groups and inadequate facilities and learning materials.”<sup>1</sup> While there are limited examples of high-poverty, racially isolated schools that consistently demonstrate academic success, as a whole, school segregation tends to prevent our most vulnerable students from receiving the education they deserve.<sup>2</sup> Due to the clear and significant negative impact racial and poverty concentration have on student outcomes, SEAs should focus on reducing student isolation and factor progress toward integration and student diversity into their accountability systems.<sup>3</sup>

*Including Strategies for Fostering Racial and Socioeconomic Integration as State-Determined, Evidence-Based Title I Interventions.* Studies consistently show that racially, culturally, and economically diverse schools are strongly associated with a range of short and long term benefits for all racial groups.<sup>4</sup> This includes gains in math, science, reading, and critical thinking skills and improvements in graduation rates.<sup>5</sup> Research also demonstrates that diverse schools are better equipped than high-poverty schools to counteract the negative effects of poverty.<sup>6</sup> Over the long-term, students who attend diverse schools are more likely than stu-

- 1 Gary Orfield et al., *E Pluribus... Separation: Deepening Double Segregation for More Students* (Civil Rights Project/Proyecto Derechos Civiles, 2012), 21, available at [http://civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/mlk-national/e-pluribus...separationdeepening-double-segregation-for-more-students/orfield\\_epluribus\\_revised\\_omplete\\_2012.pdf](http://civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/mlk-national/e-pluribus...separationdeepening-double-segregation-for-more-students/orfield_epluribus_revised_omplete_2012.pdf).
- 2 Douglas N. Harris, *Ending the Blame Game on Educational Inequity: A Study of “High Flying” Schools and NCLB* (Arizona State University, 2006), retrieved from <http://files.eric.ed.gov/fulltext/ED508527.pdf>
- 3 New York City recently released its first report on school diversity efforts in response to the School Diversity Accountability Act passed by the City Council in 2014. Both the report and the School Diversity Accountability Act should prove useful to SEAs exploring how to include progress toward integration as an accountability factors. See the report at <http://schools.nyc.gov/community/city/publicaffairs/KeyDocuments/default.htm>.
- 4 For a summary of this research, see Roslyn Mickelson, “School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence,” (National Coalition on School Diversity, 2015), available at <http://www.school-diversity.org/pdf/DiversityResearch-BriefNo5.pdf>; Genevieve Siegel-Hawley, “How Non-Minority Students Also Benefit from Racially Diverse Schools,” (National Coalition on School Diversity, 2012), available at <http://school-diversity.org/pdf/DiversityResearchBriefNo8.pdf>.
- 5 For a summary of this research, see Susan Eaton, “School Racial and Economic Composition & Math and Science Achievement,” (National Coalition on School Diversity, 2011), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo1.pdf>; Susan Eaton, “How the Racial and Socioeconomic Composition of Schools and Classrooms Contributes to Literacy, Behavioral Climate, Instructional Organization and High School Graduation Rates,” (National Coalition on School Diversity, 2011), available at <http://schooldiversity.org/pdf/DiversityResearchBriefNo2.pdf>.
- 6 For a summary of this research, see Philip Tegeler, Roslyn Mickelson, and Martha Bottia, “What We Know about School Integration, College Attendance, and the Reduction of Poverty,” (National Coalition on School Diversity, 2011), available at <http://schooldiversity.org/pdf/DiversityResearchBriefNo4.pdf>.

dents from homogeneous schools to choose diverse colleges, neighborhoods, and workplaces later in life.<sup>7</sup> They possess better critical thinking skills and analytical ability and are more likely to form cross-racial friendships.<sup>8</sup> In light of the numerous benefits associated with diverse, integrated schools, SEAs should consider programs designed to foster greater integration as evidence-based Title I interventions.

ESSA includes the requirement that state education agencies engage in “timely and meaningful consultation” with a variety of stakeholders while developing many aspects of Title I plans, as well school accountability systems. As a group deeply concerned about equity in education, we ask to be included as a stakeholder in your planning for ESSA implementation. Specifically, we request the involvement of **PERSON(S)** from our organization during **the SEA’s** school accountability system development and state-determined Title I intervention development.

Thank you for your consideration.  
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**[ORGANIZATION PRESIDENT/CEO]**

7 For a summary of this research, see Susan Eaton and Gina Chirichigno, “The Impact of Racially Diverse Schools in a Democratic Society,” (National Coalition on School Diversity, 2011), *available at* <http://www.school-diversity.org/pdf/DiversityResearchBriefNo3.pdf>

8 *Supra* note 1. See also Genevieve Siegel-Hawley, “How Non-Minority Students Also Benefit from Racially Diverse Schools,” (National Coalition on School Diversity, 2012), *available at* <http://school-diversity.org/pdf/DiversityResearchBriefNo8.pdf>.

This issue brief was prepared by Michael Hilton, Policy Analyst at the Poverty & Race Research Action Council. Thanks to Janel George, David Hinojosa, Brenda Shum, Phil Tegeler, Halley Potter, and Elizabeth DeBray for their helpful input and comments on an earlier draft.

The National Coalition on School Diversity is a network of national civil rights organizations, university-based research institutes, local educational advocacy groups, and academic researchers seeking a greater commitment to racial and economic diversity in federal K-12 education policy and funding. www.school-diversity.org

Also available from NCSD:

Issue Brief 5: Linking Housing And School Integration Policy: What Federal, State And Local Governments Can Do. In collaboration with the Poverty & Race Research Action Council (PRRAC).

Issue Brief 5: Research Brief: School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence.

Issue Brief 6: Research Brief: How Non-Minority Students Also Benefit from Racially Diverse Schools.