



U.S. Department of Education
Office of Inspector General

The Connecticut State Department of Education's Implementation of Selected Components of Connecticut's Statewide Accountability System

September 29, 2025
ED-OIG/A24IL0199

NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. The appropriate Department of Education officials will determine what corrective actions should be taken.

In accordance with Freedom of Information Act (Title 5, United States Code, Section 552), reports that the Office of Inspector General issues are available to members of the press and general public to the extent information they contain is not subject to exemptions in the Act.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

September 29, 2025

Charlene M. Russell-Tucker
Commissioner
Connecticut State Department of Education
450 Columbus Boulevard
Hartford, CT 06103

Dear Commissioner Russell-Tucker:

Enclosed is our final audit report, "The Connecticut State Department of Education's Implementation of Selected Components of Connecticut's Statewide Accountability System," Control Number ED-OIG/A24IL0199. This report incorporates the comments you provided in response to the draft report. The U.S. Department of Education's policy is to expedite audit resolution by timely acting on findings and recommendations. Therefore, if you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Department of Education official, who will consider them before taking final Departmental action on this audit:

Hayley Sanon
Acting Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

We appreciate your cooperation during this review. If you have any questions, please contact me at (916) 213-7630 or Ben.Sanders@ed.gov.

Sincerely,

/s/

Ben Sanders
Director, Elementary and Secondary Education Oversight Team

Enclosure

Results in Brief

The Connecticut State Department of Education's Implementation of Selected Components of Connecticut's Statewide Accountability System



Why Did the OIG Perform This Audit?

The U.S. Department of Education (Department) allocates funds to States through statutory formulas based primarily on census poverty estimates and the cost of education in each State. To receive funding, a State plan that includes a description of its accountability system must be submitted to the Department for review and approval.

For the 2022–2023 and 2023–2024 Federal funding periods, the Connecticut State Department of Education (CSDE) was awarded about \$156.4 million and \$155 million in Title I, Part A funds, respectively. The Elementary and Secondary Education Act of 1965, as amended, requires States to reserve a portion of their Title I funds to provide technical assistance and support for local educational agencies (LEA) with schools whose students are most in need of the additional support to improve their academic performance. Therefore, it is essential that the funds reach those students.

The objective of our audit was to determine whether CSDE implemented selected components of its statewide accountability system in the fall of 2022 based on data for school year 2021–2022.

What Did the OIG Find?

We found that CSDE implemented two (student academic achievement and school success indicators and annual meaningful differentiation) of the three selected components of the statewide accountability system ([Finding 1](#)) and provided additional funding and support services to LEAs with identified schools in accordance with Connecticut's approved State plan and CSDE's policies and procedures ([Finding 2](#)). However, its implementation of certain aspects of the third selected component (identification of low-performing schools) of the accountability system deviated from the plan. As a result, CSDE did not identify all schools for comprehensive support and improvement (CSI) that it should have identified in the fall of 2022 ([Finding 3](#)). Additionally, CSDE did not always identify or correctly identify the student subgroups needing additional targeted support and improvement (ATSI) in accordance with Connecticut's approved State plan, which it attributed to a system coding error for ATSI ([Finding 4](#)).

What Is the Impact?

Stakeholders have reasonable assurance that CSDE is implementing two of the three critical Title I-related components of Connecticut's statewide accountability system covered by our review in accordance with the approved State plan and CSDE's policies and procedures. However, not following procedures in an approved State plan for identifying schools for CSI can lead to different schools or a different number of schools being identified for additional support, which could result in eligible schools not receiving valuable resources to which they were entitled and ineligible schools receiving valuable resources to which they were not entitled and that could have benefited other schools in need of and eligible for additional support. Additionally, when CSDE does not correctly identify an eligible student subgroup for ATSI, it may not correctly identify that subgroup and school for CSI in the future which could result in student subgroups and schools in need of and eligible for CSI not receiving valuable resources to which they were entitled.

What Are the Next Steps?

We recommend that the Assistant Secretary for Elementary and Secondary Education require CSDE to amend Connecticut's State plan by updating its procedures for identifying schools for CSI to ensure they align with the procedures in CSDE's "Using Accountability Results to Guide Improvement" and the definition of a school identified for CSI in the ESEA and provide support to the five Title I schools that should have been identified for CSI. We also recommend that the Assistant Secretary for Elementary and Secondary Education verify that CSDE implemented corrective actions to fix the system coding error to ensure that it correctly identifies student subgroups needing ATSI in the future.

We provided a draft of this report to CSDE for comment. CSDE agreed with some but not all of our recommendations. We summarize CSDE's comments and provide our responses, if any, at the end of each finding. We also provide the full text of CSDE's comments at the end of the report ([CSDE Comments](#)).

Table of Contents

Introduction	1
Audit Results	5
Finding 1. CSDE Implemented Two of the Three Selected Components of the Statewide Accountability System as Designed	6
Finding 2. CSDE Provided Additional Funding and Support Services to LEAs with Schools Needing Additional Support	9
Finding 3. CSDE Did Not Identify Eight Schools for CSI That It Should Have Identified in the Fall of 2022	11
Finding 4. CSDE Did Not Always Identify or Correctly Identify the Student Subgroups Needing ATSI	13
Appendix A. Scope and Methodology.....	15
Appendix B. Acronyms and Abbreviations.....	19
CSDE Comments.....	20

Introduction

Background

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015 (ESEA), authorizes the U.S. Department of Education (Department) to provide grants to States and local educational agencies (LEA) to improve the quality of elementary and secondary education. The ESEA consists of nine formula grant programs, including Title I (Improving the Academic Achievement of the Disadvantaged). The purpose of Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps. Title I, Part A provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging State academic standards. The Office of School Support and Accountability within the Department's Office of Elementary and Secondary Education is responsible for administering and overseeing the Title I, Part A program.

The Department allocates Title I, Part A funds to States through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each State. Section 1003 of the ESEA requires each State to reserve at least 7 percent of its Title I allocation or the sum of the amount the State reserved and received for fiscal year 2016 (whichever is greater) to carry out a statewide system of technical assistance and support for LEAs. For Federal fiscal years 2021 through 2024, Congress authorized about \$70.9 billion for grants to States and LEAs for activities allowed under Title I, Part A.

To receive funding under the ESEA, a State must submit a State plan to the Department for review and approval. The State plan is intended to hold States accountable for student academic achievement and school success and is required to include a description of the statewide accountability system based on challenging academic standards to improve student academic achievement and school success. The State should design its accountability system to measure progress in achieving established long-term goals for reading or language arts and math proficiency, graduation rates, and English language proficiency for all students and separately for each student subgroup. The accountability system should include the following components: (1) long-term goals, (2) indicators used to measure student academic achievement and school success,

(3) annual meaningful differentiation of schools,¹ (4) identification of low-performing schools and schools with low-performing student subgroups, and (5) annual measurement of student academic achievement.

According to section 1111(a)(6) of the ESEA, a State's approved plan remains in effect for the duration of the State's participation in ESEA programs. If at any time a State wants to make significant changes to its plan, it must submit a request to the Department in the form of revisions or amendments to the State plan.

The Connecticut State Board of Education establishes educational policies, prepares legislative proposals, sets academic standards for teachers and students, and provides leadership and support services to Connecticut's LEAs. As the administrative arm of the Connecticut State Board of Education, the Connecticut State Department of Education (CSDE) is responsible for distributing funds to all Connecticut public LEAs and helping to ensure equal opportunity and excellence for all Connecticut students through leadership, curriculum, research, planning, evaluation, assessment, data analyses, and other assistance. CSDE's Turnaround Office is responsible for providing resources and support services to the lowest-performing public schools in Connecticut. The Turnaround Office uses a tiered system of differentiated supports and guidance that is intended to help ensure that LEAs effectively use the Federal and State school improvement funds that CSDE allocates to them for the benefit of schools identified for additional support. For the Federal funding periods July 1, 2022, through September 30, 2023, and July 1, 2023, through September 30, 2024, the Department awarded CSDE \$156.4 million and \$155 million in Title I, Part A funds, respectively. Connecticut's lowest performing public schools may also receive funding and additional support services through State programs such as the Alliance District Program and Commissioner's Network.

Connecticut's State Plan, Waivers, and Statewide Accountability System

The Department approved Connecticut's State plan on August 15, 2017.² Connecticut's State plan established the processes that CSDE should follow to identify schools for

¹ A system that a State designs to annually make accountability determinations based on multiple indicators for each school and each school's student subgroups to differentiate its overall performance and quality from other schools.

² All approved State plans and amendments can be found at <https://www.ed.gov/about/ed-offices/oese/key-documents-school-support-and-accountability>

additional support in three school improvement categories: comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI).

- **CSI.** Schools identified for CSI are generally the lowest-performing 5 percent of all schools in Connecticut that received Title I, Part A funds and public high schools with a graduation rate of 67 percent or less.
- **TSI.** Schools identified for TSI are generally those with one or more consistently underperforming student subgroups.
- **ATSI.** Schools identified for ATSI are generally those in which any student subgroup on its own would lead to identification for CSI. These schools are a subset of TSI schools.

Connecticut's State plan also established the factors that CSDE should use to identify and classify schools for additional support: (1) proficiency on statewide assessment in English language arts (ELA), mathematics, and science, (2) change in average test scores for elementary and middle schools, (3) participation rate, (4) chronic absenteeism, (5) preparation for postsecondary and career readiness coursework, (6) preparation for postsecondary and career readiness exams, (7) on track to high school graduation, (8) 4-year adjusted cohort graduation rate, (9) 6-year adjusted cohort graduation rate, (10) postsecondary entrance, (11) physical fitness, and (12) arts access. The State plan identified the types of differentiated support that should be provided to schools identified as needing additional support, which in part included support in identifying evidence-based interventions, CSDE cross-divisional team support, and monitoring and evaluation of the use of Federal funds.

Waivers. On March 27, 2020, the Department provided CSDE with a waiver from the statewide assessment, accountability, and reporting requirements for school year 2019–2020 because of disruptions that the Coronavirus Disease 2019 pandemic caused. On April 6, 2021, the Department provided CSDE with another waiver, this time from the school identification and reporting requirements for school year 2020–2021. As a condition of that waiver, CSDE agreed to identify public schools for CSI, TSI, and ATSI in the fall of 2022 to ensure that the identification of schools needing additional support resumed quickly.

Statewide Accountability System. CSDE's statewide accountability system focuses on measuring the success of a school and LEA beyond students' test scores. It covers 13 student subgroups: (1) economically disadvantaged students, (2) students with disabilities, (3) English language learners, (4) female students, (5) male students, (6) American Indian or Alaska Native students, (7) Asian students, (8) Black and African

American students, (9) Hispanic and Latino students, (10) Native Hawaiian and Pacific Islander students, (11) students of two or more races, (12) White students, and (13) high-needs students. The high-needs student subgroup (an unduplicated count of students who are from low socioeconomic backgrounds, English learners, or students with disabilities) is a special group that CSDE created which allows schools to have visible student subgroups and include more English learners and students with disabilities in the accountability calculations. Student subgroups are assigned accountability points for each indicator used to measure student academic achievement and school success.

CSDE's "Using Accountability Results to Guide Improvement" (Accountability Guide) describes the procedures for assigning accountability points for each indicator used to measure student academic achievement and school success; calculating an accountability score for each school and assigning them to one of five categories based on their score; and identifying schools for CSI or TSI.

Audit Results

CSDE implemented two (student academic achievement and school success indicators and annual meaningful differentiation) of the three selected components³ of its statewide accountability system and provided additional funding and support services to LEAs with schools identified for additional support and improvement in accordance with Connecticut's approved State plan and CSDE's policies and procedures. However, its implementation of certain aspects of the third selected component (identification of low-performing schools) of the accountability system deviated from the plan. We identified some exceptions related to CSDE's identification of CSI schools and ATSI student subgroups.

1. **Indicators used to measure student academic achievement and school success.** CSDE implemented the indicators used to measure student academic achievement and school success in accordance with Connecticut's approved State plan and CSDE's policies and procedures ([Finding 1](#)).
2. **Annual meaningful differentiation.** CSDE applied a system of annual meaningful differentiation to identify differences in school performance in accordance with Connecticut's approved State plan and CSDE's policies and procedures ([Finding 1](#)).
3. **Identification of low-performing schools and schools with low-performing student subgroups.** CSDE followed the procedures for identifying schools for CSI as described in its Accountability Guide, which did not fully align with the procedures in Connecticut's approved State plan. As a result, CSDE did not identify eight schools (including five Title I schools) for CSI that it should have identified in the fall of 2022 ([Finding 3](#)). Additionally, CSDE did not always identify or correctly identify student subgroups needing ATSI in accordance with Connecticut's approved State plan ([Finding 4](#)).
4. **Additional funding and support services provided to LEAs with schools identified for CSI, TSI, and ATSI.** CSDE provided additional funding and support to LEAs with schools identified as needing additional support in accordance with Connecticut's approved State plan and CSDE's policies and procedures ([Finding 2](#)).

³ The three selected components were (1) indicators used to measure student academic achievement and school success, (2) annual meaningful differentiation, and (3) identification of low-performing schools and schools with low-performing student subgroups.

Finding 1. CSDE Implemented Two of the Three Selected Components of the Statewide Accountability System as Designed

We found that CSDE implemented the indicators used to measure student academic achievement and school success and applied a system of annual meaningful differentiation (two of the three selected components of its statewide accountability system) in accordance with Connecticut's approved State plan and CSDE's Accountability Guide. Additionally, CSDE provided additional funding and support services to LEAs with schools needing additional support in accordance with Connecticut's approved State plan.

However, CSDE's implementation of certain aspects of the identification of low-performing schools' component (third selected component) of the accountability system deviated from the plan. As a result, CSDE did not identify 8 (17 percent) of the 48 public schools for CSI that it should have identified in the fall of 2022⁴ and did not always identify or correctly identify the student subgroups needing ATSI. We discuss these two issues in [Finding 3](#) and [Finding 4](#), respectively. Findings 1 and 2 focus on the activities and processes that CSDE executed in accordance with applicable requirements.

Implementation of the Indicators Used to Measure Student Academic Achievement and School Success

We compared the indicators in CSDE's Accountability Guide to the indicators established in Connecticut's approved State plan and found that they matched. For elementary and middle schools, CSDE measured student academic achievement and school success using the nine indicators identified in Connecticut's approved State plan: (1) ELA achievement, (2) mathematics achievement, (3) science achievement, (4) ELA growth, (5) mathematics growth, (6) progress toward English language proficiency, (7) chronic absenteeism, (8) physical fitness, and (9) on-track to high school graduation (only for middle schools with 8th grade). For high schools, CSDE measured student academic achievement and school success using the 13 indicators identified in Connecticut's approved State plan: (1) ELA achievement, (2) mathematics achievement, (3) science achievement, (4) progress toward English language proficiency, (5) chronic absenteeism, (6) preparation for college and career readiness (coursework), (7) preparation for college and career readiness (exams), (8) on-track to high school graduation, (9) 4-year

⁴ CSDE correctly identified all 32 public schools needing TSI or ATSI in the fall of 2022.

adjusted cohort graduation, (10) 6-year adjusted cohort graduation, (11) postsecondary entrance, (12) physical fitness, and (13) arts access.

Application of a System of Annual Meaningful Differentiation

To apply annual meaningful differentiation, CSDE first calculated points for each indicator based on State assessment scores or other factors using procedures described in CSDE's Accountability Guide. It then summed the points for each indicator to calculate an overall accountability score for each school. The accountability score determined the category for which the school would be assigned using a rating scale of 1–5, with 1 being assigned to schools least in need of additional support (highest accountability scores) and 5 being assigned to schools most in need of additional support (lowest accountability scores).

CSDE established performance level cutoff percentages for the overall accountability score and used those percentages to assign schools to category 1 if they received 85 percent or more of the total possible accountability points, category 2 for 70–84.9 percent, or category 3 for less than 70 percent. CSDE assigned schools that were newly identified for CSI, TSI, or ATSI to category 4 and schools that were reidentified for CSI, TSI, or ATSI to category 5.

Schools initially placed in categories 1 and 2 will be reassigned (downgraded) to a lower rated category (for example, assigned to category 2 or 3, respectively) if

- there is an achievement gap (difference between the non-high needs group and high needs is one standard deviation greater than the statewide gap) in any subject,
- there is a gap in the 6-year adjusted cohort graduation rate, or
- the participation rate is less than 95 percent for the assessment in any subject for all students group or the high needs group.

Schools initially assigned to categories 3, 4, and 5 will remain in those categories regardless of their performance with respect to the metrics above.

Following the procedures described in CSDE's Accountability Guide, we calculated the accountability scores for all 952 Connecticut public schools (746 elementary and middle schools and 206 high schools) that were operating during school year 2021–2022 to determine whether CSDE correctly applied the system of annual meaningful differentiation. For each school for which CSDE calculated an accountability score in the fall of 2022, we compared the accountability score that we calculated to the accountability score that CSDE calculated. We found that the calculations matched and

therefore concluded that CSDE had correctly calculated the accountability scores for each indicator and applied the system of annual meaningful differentiation for all 952 public schools in accordance with Connecticut’s approved State plan and the procedures described in CSDE’s Accountability Guide.

Identification of Schools Needing CSI, TSI, or ATSI

CSDE identified 72 public schools in the fall of 2022 as needing CSI (40 schools), TSI (11 schools), or ATSI (21 schools). Those 72 schools were correctly identified as needing additional support in accordance with Connecticut’s approved State plan. However, as discussed in [Finding 3](#), CSDE did not identify eight additional schools (including five Title I schools) for CSI that it should have identified in the fall of 2022. Additionally, as discussed in [Finding 4](#), CSDE did not always identify or correctly identify student subgroups needing ATSI in accordance with Connecticut’s approved State plan.

CSDE Comments

CSDE did not agree or disagree with the finding.

Finding 2. CSDE Provided Additional Funding and Support Services to LEAs with Schools Needing Additional Support

CSDE provided additional funding and support services to LEAs with schools identified as needing additional support in accordance with Connecticut's approved State plan. CSDE required LEAs to submit a school improvement plan and a needs assessment focused on academic improvement and increased student subgroup achievement for each school identified as needing CSI, TSI, or ATSI.

Funding

We reviewed reports on the additional funding that CSDE provided to LEAs with schools identified in the fall of 2022 as needing additional support. In accordance with section 1003 of Title I of the ESEA, CSDE (through its Turnaround Office) provided additional funding to LEAs with schools identified as needing CSI, TSI, or ATSI in the fall of 2022 using the part of its Title I allocation that it reserved for section 1111(d) school improvement activities. The LEAs were required to use those additional funds to support evidence-based interventions to improve student outcomes.

Of the reserved amount, CSDE allocates 70 percent to the 10 lowest-performing LEAs. Each of the 10 lowest-performing LEAs receives a proportional share of the available funds based on the number of identified schools. For fiscal years 2023–2024 and 2024–2025, CSDE's Turnaround Office provided the 10 lowest-performing LEAs with a minimum of \$200,000 per school identified for CSI and \$50,000 per school identified for TSI or ATSI. Using competitive grants, CSDE allocated the remaining 30 percent to other LEAs with schools identified as needing additional support. If funds were still available after the initial competition, schools identified for CSI, TSI, and ATSI within the 10 lowest-performing LEAs that did not receive a formula-based Title I school improvement grant could apply for additional funds. CSDE's policy was to provide additional funding to LEAs and then allow LEAs to determine which schools will receive funding. CSDE provided LEAs with guidance on how the additional funds could be spent, primarily to help them evaluate whether planned expenditures were consistent with the goals of the school improvement plan.

Support Services

Through its Turnaround Office, CSDE provided additional support services through technical assistance, training, professional development, and coaching to LEAs with schools identified for additional support. CSDE's Turnaround Office also monitored the progress of schools identified for CSI, TSI, and ATSI on meeting the long-term goals

related to the indicators used to measure student academic achievement and school success. It monitored schools identified for CSI, in part, by holding monitoring meetings, reviewing data tracking information, and conducting site visits.

CSDE Comments

CSDE did not agree or disagree with the finding.

Finding 3. CSDE Did Not Identify Eight Schools for CSI That It Should Have Identified in the Fall of 2022

CSDE should have followed the procedures described in Connecticut's approved State plan to identify schools as needing CSI in the fall of 2022. It instead followed the procedures for identifying CSI schools included in its Accountability Guide, which did not match the procedures included in Connecticut's approved State plan. As a result, CSDE did not identify eight public schools (five elementary and middle schools and three high schools) for CSI that it should have identified in the fall of 2022. Five of those eight public schools were Title I schools. Specifically, CSDE should have identified 38 elementary and middle schools and 10 high schools for CSI, but instead identified only 33 elementary and middle schools and 7 high schools for CSI.

According to Connecticut's approved State plan, schools identified for CSI are those schools with a 3-year average accountability index ranking in the lowest-performing 5 percent of all Connecticut schools (Title I and non-Title I schools). These schools are defined differently in CSDE's Accountability Guide, which defines schools identified for CSI as those with a 3-year weighted average accountability index ranking in the lowest-performing 5 percent of Connecticut's Title I schools. Although the definition of a CSI school in CSDE's Accountability Guide aligns with the definition provided in section 1111(c)(4)(D)(i) of the ESEA, CSDE should have followed the procedures for identifying schools for CSI that were included in the State plan it prepared and the Department approved. Following procedures that differ from the procedures included in Connecticut's approved State plan can lead to different schools or a different number of schools being identified for CSI. This could result in schools in need of and eligible for CSI not receiving valuable resources to which they were entitled and ineligible schools receiving valuable resources to which they were not entitled.

CSDE officials told us that CSDE did not consider its process for identifying schools for CSI to be a departure from the process described in Connecticut's approved State plan because the process that CSDE used was consistent with how it has always identified schools for CSI. At the exit briefing, CSDE told us that it would submit an amendment to the State plan updating its procedures for identifying schools for CSI to align with the procedures described in its Accountability Guide and the definition of a school identified for CSI in the ESEA.

Recommendations

We recommend that the Assistant Secretary for Elementary and Secondary Education require CSDE to—

3.1 Amend Connecticut’s State plan by updating its procedures for identifying schools for CSI to ensure that they align with the procedures in CSDE’s Accountability Guide and definition of a school identified for CSI in the ESEA.

3.2 Provide CSI to the five Title I public schools that should have been identified for CSI in the fall of 2022.

CSDE Comments

CSDE disagreed with the finding and Recommendation 3.2. CSDE stated that it never intended to establish the 5 percent standard based on both Title I and non-Title I schools, noting that its intent has always been to identify CSI schools (Title I and non-Title I schools) that were below the 5 percent standard for Title I schools. CSDE further stated that in identification years, it has identified all schools at or below the 5 percent Title I standard, regardless of Title I status. CSDE also questioned the number of impacted schools noted in the finding. For Recommendation 3.1, CSDE stated that it will update the State plan to align with its current practice for identifying schools for CSI.

OIG Response

We did not change our overall conclusion based on CSDE’s comments, but did make edits to the finding to accurately reflect the number of impacted schools and impacted Title I schools. While CSDE’s intent and current procedures for identifying schools for CSI may not be accurately reflected in the State plan, CSDE should follow the State plan as written until the Department approves an amendment. However, because the ESEA does not require an SEA to identify non-Title I schools for CSI, we modified Recommendation 3.2 to exclude non-Title I schools and instead limit our recommendation to the five Title I schools that should have been identified for CSI but were not.

Finding 4. CSDE Did Not Always Identify or Correctly Identify the Student Subgroups Needing ATSI

CSDE correctly identified 21 public schools (9 elementary and middle schools and 12 high schools) as needing ATSI for eligible student subgroups in the fall of 2022. However, within those schools identified for ATSI, CSDE did not always identify all student subgroups that it should have identified (omissions) or correctly identify the eligible student subgroups (incorrect identifications).

Omissions. We found that for 8 (38 percent) of the 21 public schools identified as needing ATSI, CSDE did not identify all of the eligible student subgroups that it should have identified in the fall of 2022. Across those eight schools (three elementary and middle schools and five high schools), CSDE did not identify the following student subgroups as eligible for ATSI: twice each for English learners, students with disabilities, and students of two or more races; and once each for high needs, Black or African American, White, Hispanic or Latino of any race, and male.

Incorrect Identifications. We found that for 5 (24 percent) of the 21 public schools identified as needing ATSI, CSDE incorrectly identified some student subgroups that it should not have identified in the fall of 2022. Across those five schools (three elementary and middle schools and two high schools), CSDE incorrectly identified one or more of the following student subgroups as eligible for ATSI: students with disabilities, English learners, eligible for free or reduced-priced meals (twice), and White.

According to Connecticut's approved State plan, CSDE should identify a school as needing ATSI when any student subgroup on its own would lead to identification as a school identified for CSI. Section 1111(d)(2)(C) of the ESEA requires that States identify schools for ATSI when any subgroup of students whose identification on its own would lead to being identified for CSI.

CSDE employees told us that CSDE did not always identify or correctly identify student subgroups for ATSI because of a coding error in the system that it used to identify schools for ATSI. CSDE told us that it planned to fix the system coding error.

According to Connecticut's approved State plan, ATSI subgroups that do not exit status in 4 years should be identified for CSI. If CSDE does not correctly identify a student subgroup for ATSI, CSDE would not track that subgroup over a 4-year period to verify exit status and may not correctly identify the subgroup and school for CSI in the future. This could result in student subgroups and schools in need of and eligible for CSI not receiving valuable resources to which they were entitled.

Recommendation

We recommend that the Assistant Secretary for Elementary and Secondary Education—

- 4.1 Verify that CSDE implemented corrective actions to fix the system coding error to ensure that it correctly identifies student subgroups needing ATSI in the future.

CSDE Comments

CSDE agreed with Finding 4. For Recommendation 4.1, CSDE stated that it took corrective steps to update the coding error. For Recommendation 4.2, CSDE stated that the recommendation was not applicable because ATSI subgroups are identified within TSI schools, all TSI schools are provided support from CSDE's Turnaround Office regardless of the ATSI subgroup identification, and all schools where an ATSI subgroup was not identified already had one or more correctly identified ATSI subgroups (so there were no schools in Fall 2022 that should have received additional support services that did not).

OIG Response

We modified Recommendation 4.1 and removed Recommendation 4.2 from the report based on CSDE's comments. We also modified the paragraph in the finding that describes the potential impacts associated with this finding. Because CSDE stated that it had already taken corrective action for Recommendation 4.1, we modified the recommendation to request that the Department verify that CSDE has fixed the coding error in the system used to identify subgroups for ATSI. If the system coding error was fixed as claimed, CSDE's actions are responsive to Recommendation 4.1.

Regarding Recommendation 4.2, we confirmed that CSDE's ATSI subgroups are identified within TSI schools, TSI schools receive support from CSDE's Turnaround Office, and there were no schools in Fall 2022 that should have received additional support services that did not. Therefore, we removed Recommendation 4.2 from the report.

Appendix A. Scope and Methodology

Our audit covered CSDE's procedures for implementing selected components of Connecticut's statewide accountability system based on accountability scores and categories that CSDE calculated or assigned to schools for school year 2021–2022. The three selected components were (1) indicators used to measure student academic achievement and school success, (2) annual meaningful differentiation, and (3) identification of schools needing additional support. Our audit also covered the additional funding and support services that CSDE provided to LEAs with schools identified in the fall of 2022 as needing CSI, TSI, or ATSI.

To achieve our objective, we first gained an understanding of Title I (including Part A) of the ESEA; Office of Elementary and Secondary Education letters waiving accountability requirements for school years 2019–2020 and 2020–2021 (March 27, 2020, and April 6, 2021); and *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

To determine whether CSDE implemented the three selected components of Connecticut's statewide accountability system and provided additional funding and support services to schools identified for CSI, TSI, or ATSI, we reviewed

- Connecticut's approved State plan;
- CSDE's Accountability Guide;
- CSDE's calculations of the indicators used to measure student academic achievement and school success and its assignment of categories in the fall of 2022;
- a list of Connecticut public schools that CSDE identified in the fall of 2022 as needing additional support based on their accountability scores and assigned categories for school year 2021–2022;
- records of monitoring meetings and improvement plans;
- records of trainings and coaching; and
- for school years 2022–2023 and 2023–2024, reports on the Title I set-aside funds that CSDE provided to eligible LEAs with schools identified in the fall of 2022 as needing CSI, TSI, or ATSI.

Sampling Methodology

CSDE provided us with a list of 72 Connecticut public schools that it identified for CSI (40 schools), TSI (11 schools), or ATSI (21 schools) in the fall of 2022 based on accountability scores and categories that it calculated or assigned to schools for school year 2021–2022. We selected a nonstatistical stratified random sample of 12 (17 percent)⁵ of those 72 schools to determine whether CSDE used funds reserved under section 1003 of the ESEA to provide additional support services to Connecticut public schools identified as needing additional support.

We designed our sampling plan and chose our sample sizes specifically to accomplish our audit objective. Because our samples were not large enough to project the results with the precision required by our policy, the results of our samples cannot be projected to the entire population of Connecticut public schools that CSDE identified for additional support.

Analysis Techniques

We interviewed CSDE employees to gain an understanding of the procedures used to implement Connecticut’s statewide accountability system. We also compared the procedures outlined in CSDE’s Accountability Guide to the statewide accountability system described in Connecticut’s approved State plan. We discussed any differences with CSDE officials. Additionally, we analyzed CSDE’s records relevant to implementing three of the five components of the statewide accountability system (indicators of student academic achievement and school success, annual meaningful differentiation, and identification of schools needing CSI, TSI, or ATSI) to ensure that CSDE implemented the components as described.

Indicators Used to Measure Student Academic Achievement and School Success

We compared the indicators in CSDE’s Accountability Guide to Connecticut’s approved State plan to ensure that the indicators in the guide matched the indicators in the plan. We also compared the indicators that CSDE used to calculate accountability scores to the indicators in the plan. We concluded that CSDE implemented the indicators used to measure student academic achievement and school success in accordance with the plan

⁵ Four (10 percent) of the 40 schools identified for CSI, 4 (36 percent) of the 11 schools identified for TSI, and 4 (19 percent) of the 21 schools identified for ATSI.

if the indicators that CSDE used to calculate the schools' accountability scores matched those in the plan.

System of Annual Meaningful Differentiation

We calculated accountability scores and assigned categories to each of the 952 public schools for which CSDE calculated accountability scores following the processes described in CSDE's Accountability Guide.⁶ We compared the accountability scores and categories that we calculated and assigned to the accountability scores and categories that CSDE calculated and assigned. We concluded that CSDE calculated accountability scores and assigned categories for each school in accordance with the Accountability Guide if the accountability scores and categories that we calculated and assigned for schools matched CSDE's calculations and category assignments.

Identification of Low-Performing Public Schools and Schools with Low-Performing Student Subgroups

We created a list of Connecticut public schools that CSDE should have identified for CSI, TSI, and ATSI following the procedures for calculating accountability scores, assigning categories, and identifying schools as needing additional support described in Connecticut's approved State plan. We then compared our list to the list of schools that CSDE identified as needing CSI, TSI, and ATSI in the fall of 2022. We concluded that CSDE identified schools for CSI, TSI, and ATSI in accordance with Connecticut's approved State plan if the schools on our list matched the schools on CSDE's list.

We also compared the procedures for identifying schools for CSI and TSI described in CSDE's Accountability Guide to the procedures described in Connecticut's approved State plan. We concluded that CSDE's procedures for identifying schools for CSI and TSI were in accordance with Connecticut's approved State plan if the Accountability Guide procedures matched the procedures described in the State plan.

Use of Computer-Processed Data

We relied, in part, on a list of Title I schools that CSDE provided to us; CSDE's "Accountability Data" file, which listed all public schools in Connecticut for which CSDE calculated accountability scores and assigned categories; and CSDE's "School Improvement Grant (SIG) Allocations" file, which listed all public schools receiving school improvement allocations during school years 2022–2023 and 2023–2024. We

⁶ The procedures for applying annual meaningful differentiation described in CSDE's Accountability Guide match the procedures in Connecticut's approved State plan.

used the lists and other data to determine whether CSDE implemented its procedures for identifying schools needing CSI, TSI, and ATSI; applying annual meaningful differentiation; and providing additional funding and support services to LEAs with identified schools in accordance with Connecticut’s approved State plan and CSDE’s Accountability Guide.

To assess the reliability of CSDE’s list of Title I schools and school information in CSDE’s “Accountability Data” file, we compared the public schools listed in these two documents to the public schools listed in the National Center for Education Statistics’ data file for Connecticut. To assess the reliability of CSDE’s “School Improvement Grant (SIG) Allocations” file, we compared the list of schools with school improvement allocations to CSDE’s list of identified schools and the schools listed in CSDE’s grants system that were shown as having received allocations of school improvement funds. We concluded that CSDE’s list of Title I schools and “Accountability Data” and “School Improvement Grant (SIG) Allocations” files were sufficiently reliable for the purposes of our audit.

Compliance with Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We conducted our audit at CSDE’s office in Hartford, Connecticut, and our offices from September 2024 through May 2025. We discussed the results of our work with CSDE officials on May 29, 2025, and provided them with a draft of this report on July 31, 2025.

Appendix B. Acronyms and Abbreviations

Accountability Guide	Connecticut State Department of Education “Using Accountability Results to Guide Improvement”
ATSI	additional targeted support and improvement
CSDE	Connecticut State Department of Education
CSI	comprehensive support and improvement
Department	U.S. Department of Education
ELA	English language arts
ESEA	Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015
LEA	local educational agency
TSI	targeted support and improvement

CSDE Comments



STATE OF CONNECTICUT
STATE BOARD OF EDUCATION



TO: Ben C. Sanders, Director
Office of Inspector General, U.S. Department of Education

FROM: Charlene M. Russell-Tucker [REDACTED]
Commissioner of Education

DATE: August 31, 2025

SUBJECT: Control Number EDOIG/A24IL0199

The Connecticut State Department of Education (CSDE) appreciates the U.S. Department of Education Office of Inspector General's audit of CSDE's Implementation of selected components of Connecticut's statewide accountability system. CSDE offers the attached response to the four findings in the draft report.

Thank you.

CRT:ag
cc: Ajit Gopalakrishnan

Enclosure

Box 2219 • Hartford, Connecticut 06145
An Equal Opportunity Employer

Response to Draft Audit Report from the U.S. Department of Education Office of Inspector General (OIG)

Introduction

The Connecticut State Department of Education (CSDE) appreciates the U.S. Department of Education Office of Inspector General's audit of CSDE's Implementation of selected components of Connecticut's statewide accountability system. CSDE offers the following response to the four findings in the draft report.

Response to Finding 1

The CSDE appreciates the finding that it implemented the indicators used to measure student academic achievement and school success and provided additional funding and support services to LEAs with schools needing additional support in accordance with Connecticut's approved State plan. In terms of a system of annual meaningful differentiation, the CSDE disagrees with the reference to Finding 3; a detailed response is offered under Finding 3. The CSDE agrees with the reference to Finding 4 and will describe the resolution that has already been implemented to address this minor issue.

Response to Finding 2

The CSDE appreciates the finding that it provided additional funding and support services to LEAs with schools identified as needing additional support in accordance with Connecticut's approved State plan.

Response to Finding 3

The CSDE disagrees with this finding and recommendation 3.2 and offers the following.

Connecticut's accountability system in its ESSA plan that was approved in 2017 is a continuation of the system described in ESEA Flexibility Renewal that was approved by the U.S. Department of Education (USED) in August 2015, just a few months prior to the passage of ESSA. This was mentioned repeatedly during the on-site meetings with OIG auditors in September 2024 and in CSDE's write up submitted in August 2024 prior to the on-site visit. This point is also emphasized five times in Connecticut's approved ESSA plan with links provided throughout the plan to support design decisions. Since implementation of ESEA Flexibility Renewal in 2015-16, Connecticut has consistently identified the number of Turnaround schools using the five percent Title I schools cutoff to represent at least five percent of Title I schools annually. Schools are sorted based on overall achievement, and in identification years, Connecticut has identified **all** schools (both Title I and non-Title I) falling at or below the five percent Title I standard, regardless of Title I status. Please

note that Turnaround Schools used to be called Priority Schools under ESEA Flexibility and are now called CSI Schools under ESSA, but Connecticut has retained the Turnaround label through all these transitions for consistency of implementation, interpretation, and communication.

Identifying non-Title I schools below the five percent Title I cutoff was a key shift for Connecticut from its initial ESEA Flexibility that was approved in 2012 to the revised ESEA Flexibility in 2015. In the original iteration of ESEA Flexibility in 2012, Connecticut limited school identification to five percent of Title I schools only. At that time, we received repeated guidance from USED emphasizing the need for Turnaround schools (then Priority) to represent five percent of Title I schools. Through ESEA Flexibility Renewal in 2015, we expanded identification to include **all** schools (i.e., both Title I and non-Title I) under the Title I five percent cutoff because we wanted to ensure we identified all schools needing the most support regardless of Title I status while still meeting the legal requirement to identify at least five percent of Title I schools. The procedure used for school identification starting with ESEA Flexibility Renewal is clearly stated on page 101 of the ESEA Flexibility Renewal document that was provided as supporting documentation to show how Connecticut's final ESSA plan was developed. Essentially, this practice of Turnaround schools being those schools (both Title I and non-Title I) below the five percent cut off for Title I schools is deeply ingrained and well understood in our practice for over a decade. Even when speaking about Turnaround schools internally or with district/school educators, the CSDE routinely refers to them interchangeably as "bottom five percent of all schools in the state" or "lowest five percent of schools overall," all the while knowing that operationally, this meant using the five percent Title I Schools cutoff.

Connecticut never intended to establish the five percent standard based on both Title I and non-Title I schools. Our intent, as has been stated, was always to continue our accountability system from ESEA Flexibility through and into ESSA and identify Turnaround schools (both Title I and non-Title I) that were below the five percent cut off for Title I schools. Additionally, we had learned during ESEA Flexibility that applying the five percent standard based on every school would not guarantee that the final list of schools would meet the statutory requirement to identify at least the lowest-performing five percent of all Title I schools in the State (*Title I, Part A, Section 1111(c)(4)(D)(i)(I) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015*). Therefore, under ESSA, the CSDE continued its practice of identifying Turnaround Schools based on the five percent Title I school cutoff.

CSDE maintains that no change to its ESSA Plan has occurred because the Turnaround identification provision has been implemented according to its original intent and in alignment with long-standing practice dating back to ESEA Flexibility even prior to ESSA.

Using our CSI identification process explained above, Connecticut annually provides files to USED through EdFacts [N206](#) (first due in February of 2019) and [N212](#) (first due in February of 2020). These files provide a complete list of schools identified for CSI as well as TSI, and ATSI. The files are submitted along with a list of all schools as part of EdFacts [N029](#) and the list of Title I schools as part of [N129](#) (prior to 2022-23) and [N223](#) (beginning 2022-23). Thus, since the initial identification year of schools under ESSA, Connecticut has continued to keep USED informed that Connecticut's Turnaround (CSI) schools represented both Title I and non-Title I schools that were below the five percent cut off for Title I schools and not five percent of all schools.

CSI schools were also reported as part of the Consolidated State Performance Report (CSPR) Part II due in February of 2019. The first criteria specified by USED in the CSPR Part II (see table below) further confirms that the criteria used by Connecticut does indeed align with the federally required criteria and reinforces our operationalization of the CSI identification criteria in our ESSA plan.

	Number of Schools	Number of Title I Schools	Number of non-Title I Schools
Lowest performing five percent of Title I schools			
High schools failing to graduate one third or more of their students			
Title I schools that have received additional targeted support under Section 1111(d)(2)(C) of the ESEA and that have not exited that status after a State-determined number of years			
Total Identified	(Auto Calculated)		

Connecticut's approach to identifying Turnaround Schools has been disseminated publicly since the inception of this accountability system under ESEA Flexibility. The document entitled [Using Accountability Results to Guide Improvement](#), has been created and disseminated from those early years and even made available to USED multiple times over the past decade.

1. The Guide was discussed with USED staff as part of their Targeted Monitoring on Equitable Allocation of Resources that was conducted in Spring/Summer 2022.
2. The Guide was submitted to USED as part of assessment Peer Review; specifically, the fifth edition of the Guide which contained the Turnaround (CSI) five percent Title I cutoff values was submitted as Evidence # 2.1.2 in June 2020.
3. The Guide has also been posted publicly and very transparently on the Next Generation Accountability System report page since the very inception of this accountability system, again prior to ESSA.
4. The Guide was accessible to the USED when they conducted annual Report Card reviews of our website under ESSA.

In summary:

- Connecticut's ESSA accountability plan is a direct extension of its approach implemented prior to ESSA through ESEA Flexibility that was approved by USED.
- Connecticut has maintained the Turnaround (CSI) identification procedures initially implemented in 2015-16 without changes.
- Since ESSA, all relevant data have been provided by Connecticut to USED annually keeping USED informed of Connecticut's implementation of its ESSA plan criteria.

- The USED CSPP Part II criteria required after the first year of identification under ESSA confirms the methodology applied by CSDE.
- CSDE has shared its business rules document, i.e., Using Accountability Results to Guide Improvement with the USED before and after ESSA.
- For all these reasons, CSDE does not consider this a change to its ESSA Plan because it was implementing the provision of Turnaround identification as it had intended and as it had done prior to ESSA under ESEA Flexibility.

The CSDE, the Education Committee of the Connecticut General Assembly, school district leaders, and local municipalities are currently engaged in robust conversations about the state's framework for supporting districts and schools i.e., Alliance Districts and Commissioner's Network. Additionally, as required in state law, the CSDE is finalizing a report to the legislature on the Alliance District program along with recommendations for improving that program. These efforts are expected to result in comprehensive legislation during the Spring 2026 legislative session that will likely overhaul these support frameworks. Subsequent to that legislative session, the CSDE plans to submit a comprehensive ESSA Plan amendment request to the USED. At that time, as proposed in recommendation 3.1, the CSDE will make a minor edit to the one relevant sentence in our plan to ensure that it more explicitly states our intention and our long-standing practice.

Note: It is unclear how the report arrives at 58 when five percent of 952 is 48.

Response to Finding 4

The CSDE appreciates the finding and has already implemented the corrective steps necessary to address this minor issue. Ultimately, this issue only affected four schools in 2024-25.

The following should be noted:

- The CSDE labeled 100 percent of ATSI schools accurately as ATSI. All schools where an ATSI subgroup was not identified already had one or more correctly identified ATSI subgroups. In other words, there was **no school in Fall 2022 that should have received the ATSI "label" that did not.**
- The CSDE correctly moved 100 percent of Focus/TSI schools with at least one ATSI subgroup that did not meet the exit criteria within four years as outlined in our ESSA plan to Turnaround/CSI.
- Other Focus/TSI schools where an ATSI subgroup was not identified had already exited Focus/TSI status by Fall 2024.
- As per our approved ESSA plan, ATSI subgroups are identified within Focus/TSI schools. All Focus/TSI schools are provided support from the CSDE's Turnaround Office, regardless of any ATSI subgroup identification. There is no special or different support for a Focus/TSI school that has one or more identified ATSI subgroups. As such, recommendation 4.2 is not applicable.

In addition to adjusting the code, the CSDE has already notified the four schools about the ATSI subgroup(s) in their schools. The CSDE has also replaced the school identification lists for 2021-22, 2022-23, and 2023-24 on its website with the updated ATSI subgroup identification. The CSDE is happy to provide USED with this information when appropriate.