

## Comprehensive Support and Improvement Process

This resource provides a comprehensive overview of Kentucky’s process for identifying and supporting schools in need of comprehensive support and improvement (CSI) beginning in fall 2025. Its purpose is to guide district and school leaders, educators and stakeholders through the requirements, procedures and expectations associated with CSI identification, audits, turnaround interventions and monitoring. It also details the exit criteria for CSI schools.

The document covers:

- Annual CSI identification criteria and timelines
- District and school audit processes, including required elements and team membership
- Steps for developing and implementing turnaround plans
- Roles and responsibilities of advisory leadership and turnaround teams
- Monitoring, funding, curriculum and professional learning requirements
- Procedures for exiting CSI status and reinstating school-based decision making (SBDM) authority

For a timeline of required actions and deadlines, please refer to the CSI Timeline Table in Appendix A at the end of this document.

By outlining these processes, this resource aims to clarify statutory and regulatory obligations, support effective school improvement and ensure transparency for all involved parties.

## Identification

- House Bill 298 amended KRS 160.346 to specify that schools will be identified for CSI on an annual basis.
  - CSI schools will be identified every year starting in fall 2025.<sup>1</sup>
- Schools will be identified for CSI if
  - they are in the lowest five percent (5%) of schools by level based on the school's performance in the state accountability system;
  - they are a high school with a four (4) year cohort graduation rate below eighty percent (80%), or
  - they fail to exit additional targeted support and improvement (ATSI) status after three years.<sup>2</sup>

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<sup>1</sup> KRS 160.346(3), Section 1111(c) of Title I of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, 20 U.S.C. 6311(c) and (d)

<sup>2</sup> KRS 160.346(3)

## District Audit

- A district shall be subject to a district audit performed by the Kentucky Department of Education (KDE) when a school in the district is identified as CSI.<sup>3</sup>
- A district will be scheduled for an audit within forty-five (45) days of the KDE identifying a school within that district for CSI.
  - The audit's purpose is to review the district's administration and its leadership capacity as it relates specifically to the identified CSI school(s).<sup>4</sup>
- The district audit is a comprehensive review that must include the following eight (8) elements:
  - Analysis of state and local education data;
  - A review of the district's ability to function and a recommendation to the commissioner on whether the district has the capacity to manage the intervention in the identified school(s);
  - Examination of the comprehensive district improvement plan (CDIP) and other planning documents;
  - Interviews with local board members, students, parents, school and district personnel, and community members;
  - Direct observation;
  - Administration of teacher and principal working conditions surveys and student satisfaction surveys;
  - Review of school board minutes and agendas;
  - Gathering of any other information deemed necessary by the commissioner or their designee to assess the district's functionality and support for school improvement.<sup>5</sup>
- The district's ability to manage interventions in a school identified for CSI will be evaluated based on its capacity in the following areas:
  - The district maintains and communicates a clear, visionary purpose focused on high learning expectations and shared values about teaching and learning;
  - The district operates with leadership and governance practices that promote student performance and overall system effectiveness;
  - The district uses a data-driven approach to design and deliver curriculum and instruction, ensuring teacher effectiveness and student achievement;
  - The district has systems in place for accurate data collection and effective use of that data;
  - The district ensures human and financial resources are allocated strategically to support improvement and success for all students;

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<sup>3</sup> 703 KAR 5:280 (4)(1)

<sup>4</sup> 703 KAR 5:280 (4)(2)

<sup>5</sup> 703 KAR 5:280 (4)(3)(a-h)

- The district implements a comprehensive assessment system that generates diverse data on student learning and system performance, using results to guide continuous improvement.<sup>6</sup>
- Each district is limited to one (1) audit per year, regardless of how many schools within the district are identified for comprehensive support and improvement.<sup>7</sup>
- No district may undergo more than one (1) audit every three (3) years, regardless of how many schools are identified for CSI.<sup>8</sup>

## School Audit

- Schools identified for CSI must undergo an audit scheduled within forty-five (45) days of a school's identification for CSI and performed by the KDE to diagnose the causes of the school's low performance and the audit conducted shall be the only comprehensive audit required for a school unless the school fails to exit CSI status or exits CSI status but subsequently repeats as a school identified for CSI.<sup>9</sup>
- The department's audit shall encompass the following:
  - a diagnosis of the causes of the school's low performance, with an emphasis on underperforming subgroups of students and corresponding critical resource inequities;
  - an assessment and recommendation to the superintendent regarding the best strategies to address the school's specific needs;
  - an assessment of the interaction and relationship among the superintendent, central office personnel, and the school principal;
  - a recommendation of the steps the school may implement to launch and sustain a turnaround process; and
  - a recommendation to the local board of education of the turnaround principles and strategies necessary for the superintendent to assist the school with turnaround; and
  - an assessment and recommendation to the superintendent regarding the principal's capacity to lead the turnaround effort in the school.<sup>10</sup>
- A school audit must include and integrate the following criteria into both the audit process and the final report:
  - Examination of state and local education data;
  - Analysis and recommendation on the principal's capacity to lead turnaround efforts;<sup>11</sup>

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<sup>6</sup> 703 KAR 5:280 (4)(4)(a-f)

<sup>7</sup> 703 KAR 5:280 (4)(5)

<sup>8</sup> 703 KAR 5:280 (4)(6)

<sup>9</sup> KRS 160.345(6)-(7), 703 KAR 5:280 (10)(14), 703 KAR 5:280 (3)(1)

<sup>10</sup> KRS 160.346(7)(a)

<sup>11</sup> 703 KAR 5:280 (3)(3)

- Examination of the comprehensive school improvement plan (CSIP) and other planning documents;
- Interviews with students, parents, school council members (if applicable), school and LEA personnel, and community members;
- Direct observation;
- Administration of teacher and principal working conditions surveys and student satisfaction surveys;
- Review of minutes and agendas of school council meetings (if applicable);
- Gathering of any other information deemed necessary by the commissioner or their designee.<sup>12</sup>

## Audit Team Membership

- Members of the audit team for both district and school audits shall meet the following requirements:
  - Members shall be chosen from qualified applicants by the department and approved by the commissioner or designee;
  - Members shall complete department-provided or approved training to perform their duties effectively;
  - Members shall hold appropriate certification or qualifications for the position they represent;
  - No member shall be currently employed by or affiliated with the local education agency (LEA) or school being audited.<sup>13</sup>
- The team shall include:
  - a chairperson (designated by the department or its designee) who shall be a certified administrator approved by the department to provide school improvement assistance, a certified administrator member of the review team, or a similarly qualified professional approved by the department;
  - an individual approved by the department to provide school improvement assistance;
  - a teacher who is actively teaching or has taught within the last three (3) years,
  - a principal who is currently serving or has served as a principal within the last three (3) years;
  - an LEA representative who is currently serving or has served in an LEA administrative position within the last three (3) years;
  - a parent or legal guardian who has or has had a school-aged child within the last three (3) years; and

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<sup>12</sup> 703 KAR 5:280 (3)(2)(a-h)

<sup>13</sup> 703 KAR 5:280 (2)(2-5)

- for schools having eight (8) percent or more minority students enrolled, as determined by the enrollment of the preceding October 1<sup>14</sup>, at least one minority member who may serve in addition to the six members or may be identified from among the six members.<sup>15</sup>

## Audit Report

- School and district audit findings and capacity recommendations must be submitted to the commissioner.<sup>16</sup>
  - The commissioner will determine:
    - The district or governing board's level of functioning.
    - Whether the district or governing board has the capacity to manage interventions in each identified school.
- After completing initial school or district audits, and within thirty (30) days of receiving audit findings, the commissioner must:<sup>17</sup>
  - Notify in writing the school and district of the audit findings and recommendations on the principal and the district's leadership capacity and authority.
  - Determination of the district or governing board's leadership capacity and authority.
  - The superintendent must then make any necessary decisions regarding the principal or other certified staff in accordance with KRS 160.346(8)(c)-(d).
- The report of an audit shall be provided to the superintendent, local board of education, school principal, commissioner of education and the Kentucky Board of Education.<sup>18</sup>
  - The audit report will include the criteria listed above.<sup>19</sup>
- Within fifteen (15) days of receiving the audit report, a school or district may appeal principal or district capacity determinations.<sup>20</sup>

## Turnaround Intervention Process – Leadership Implications and Turnaround Team

- The turnaround process is led by a turnaround team. The turnaround team shall be comprised of team members selected by the Department in collaboration with the Superintendent and approved by the commissioner, or his designee, and the local board

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<sup>14</sup> [SAAR Minority Report](#)

<sup>15</sup> 703 KAR 5:280 (2)(6)(a-h)

<sup>16</sup> 703 KAR 5:280 (5)(1-2)

<sup>17</sup> 703 KAR 5:280 (5)(3)

<sup>18</sup> KRS 160.346(7)(b)

<sup>19</sup> KRS 160.346(7)(a)

<sup>20</sup> 703 KAR 5:280(5)(4)(a)

of education to provide school improvement assistance. The local board of education shall approve the turnaround team.<sup>21</sup>

- The turnaround team shall be responsible for the following activities:
  - Leading the creation and initial implementation of the three-year turnaround plan;
  - Providing strong support in instructional leadership, curriculum, and school-level improvement systems;
  - Monitoring progress toward turnaround goals through regular data and implementation reviews;
  - Advising the superintendent and principal on staffing, scheduling, resource allocation, and professional learning aligned with turnaround objectives;
  - Establishing systems for evidence-based instructional practices and equitable learning environments through collaboration with the principal;
  - Providing relevant training and professional learning for teachers;
  - Supporting the transition of improvement efforts to the Advisory Leadership Team prior to exit from CSI status; and
  - Other activities deemed necessary by the Commissioner to support school turnaround.<sup>22</sup>
- The authority of the school-based decision making (SBDM) council granted under KRS 160.345 shall be transferred to the superintendent upon receipt of the audit report;
  - A school's right to establish a council granted under KRS 160.345 may be restored by the local board of education two (2) years after the school exits CSI status<sup>23</sup> (*see more guidance in the School-Based Decision-Making Council Authority Reinstatement section of this document*).

KRS 160.346(8) states:

- The superintendent shall select a principal for the school if a principal vacancy occurs. The superintendent shall consult with the turnaround team, parents, certified staff, and classified staff before appointing a principal replacement;<sup>24</sup>
- Upon recommendation of the principal, the superintendent may reassign certified staff members to a comparable position in the school district;<sup>25</sup>
- The superintendent shall collaborate with the turnaround team to design ongoing turnaround training and support for the principal and a corresponding monitoring system of effectiveness and student achievement results;<sup>26</sup> and

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<sup>21</sup> 703 KAR 5:280(6)(1)

<sup>22</sup> 703 KAR 5:280(6)(2) (a-h)

<sup>23</sup> KRS 160.346(15)

<sup>24</sup> KRS 160.346(8)(c)

<sup>25</sup> KRS 160.346(8)(d)

<sup>26</sup> KRS 160.346(8)(e)

- The principal shall collaborate with the turnaround team to establish an advisory leadership team representing school stakeholders including other school leaders, teachers, and parents.<sup>27</sup>

## Turnaround Intervention Process - Turnaround Plan

- Within forty-five (45) days after the commissioner notifies the superintendent of the audit findings, the turnaround team shall develop a turnaround plan pursuant to KRS 160.346(8)(g).<sup>28</sup>
- In consultation with the department, the local school board shall collaborate with the superintendent, principal, turnaround team, and the advisory leadership team to propose a three (3) year turnaround plan. <sup>29</sup>
  - The turnaround plan shall include requests to the department for exemptions from submitting documentation that are identified as inhibitors to investing time in innovative instruction and accelerated student achievement of diverse learners including ongoing staff instructional plans, student interventions, formative assessment results, or staff effectiveness processes;
  - The turnaround plan shall be reviewed for approval by the superintendent and the local board of education and shall be subject to review, approval, monitoring, and periodic review by the department;<sup>30</sup>
  - The school district may request technical assistance from the department for development and implementation of the turnaround plan, which may include conducting needs assessments, selecting evidence-based interventions, and reviewing and addressing resource inequities;
  - The turnaround plan shall be fully implemented by the first full day of the school year following the school year the school was identified for CSI; and
  - The superintendent shall periodically report to the local school board, and at least annually to the commissioner of education, on the implementation and results of the turnaround plan.
- The turnaround plan shall be embedded in the comprehensive school improvement plan (CSIP) and shall include:
  - Evidence-based interventions to be utilized to increase student performance and address the critical needs identified in the school audit;
  - A comprehensive list of persons and entities involved in the turnaround efforts and the specific roles each shall play in the school's turnaround; and

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<sup>27</sup> KRS 160.346(8)(f)

<sup>28</sup> 703 KAR 5:280(6)(4)

<sup>29</sup> KRS 160.346(8)(g-j)

<sup>30</sup> KRS 158.782

- A review of resource inequities that shall include an analysis of school level budgeting to ensure resources are adequately channeled towards school improvement.<sup>31</sup>
- Following receipt of the turnaround plan and before the beginning of the school year following the audit, the commissioner, in consultation with the advisory leadership team, superintendent, and local board of education, shall determine the sufficiency of the school's turnaround plan to meet the needs of the school's turnaround effort. If the commissioner finds that the plan is not sufficient to meet the needs of the school turnaround effort for a school identified CSI, the department shall provide feedback detailing the deficiencies and advise the LEA and school to make changes to the plan.<sup>32</sup>

### Advisory Leadership Team

- The principal of a school identified for CSI shall provide to the department, in a format acceptable to the department, the names and addresses of advisory leadership team members appointed.<sup>33</sup>
- Guidance on establishing the advisory leadership team:
  - The principal shall ensure that schools having eight (8) percent or more minority students enrolled, as determined by the enrollment on the preceding October 1, shall have at least one (1) minority member serving on the advisory leadership team.
  - Meetings of the advisory leadership team shall be conducted in accordance with the Kentucky Open Meetings Act or its successor. The advisory leadership team, in collaboration with the principal, shall determine the frequency of and agenda for their meetings. The advisory leadership team shall function as a consultative body.<sup>34</sup>
- The duties of the advisory leadership team shall include:
  - Serving as a representative voice of the school community during the turnaround process;
  - Providing support for systems that seek to build capacity in school leadership;
  - Promoting a positive school culture focused on distributed leadership, continuous improvement, and high expectations for all students;
  - Supporting the continual use of evidence-based decision-making to guide and support school improvement;
  - Supporting transparent communication with stakeholders by reviewing progress data and helping to disseminate key information; and

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<sup>31</sup> 703 KAR 5:225(6)(5)(a-c)

<sup>32</sup> 703 KAR 5:280(6)(7)

<sup>33</sup> KRS 160.346(8)(f), 703 KAR 5:280 (7)(1)

<sup>34</sup> 703 KAR 5:280(7)(3-5)

- Retaining institutional knowledge and supporting continuity of improvement practices after the departure of the turnaround team.<sup>35</sup>

## Monitoring

- Pursuant to the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act, 20 U.S.C.A. Section 6301, all schools identified for CSI shall be subject to monitoring and periodic review by the department.<sup>36</sup>
  - Monitoring shall include:
    - Onsite support by department staff
    - Annual review of school and LEA state accountability data;
    - Review of indicators of school quality;
    - Other measures deemed necessary by the department to ensure compliance with the Every Student Succeeds Act, or its successor.<sup>37</sup>
  - Periodic review of the turnaround plan shall include:
    - Periodic site visits;
    - Direct observation; and
    - Interviews with students, parents, all school council members, if applicable, school and LEA personnel and community members.<sup>38</sup>

## Funding

- A school identified for CSI shall be eligible to apply for funding under 20 U.S.C. 6303. Any funds awarded to a school pursuant to 20 U.S.C 6303 (school improvement funds [SIF]) shall be utilized to pay for turnaround activities.<sup>39</sup>

## Additional Requirements (new for 2025-2026)

- All schools identified for CSI shall participate in all professional learning activities deemed necessary by the Department to support the implementation of evidence-based instructional practices, instructional materials and assessments.<sup>40</sup>
  - Required professional learning shall be related to evidence-based practices in instruction, instructional materials implementation and assessment for reading and mathematics and aligned to Kentucky Academic Standards (KAS) required by KRS 158.6453.

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<sup>35</sup> 703 KAR 5:280(7)(5)(a-f)

<sup>36</sup> KRS 158.782 (1)

<sup>37</sup> 703 KAR 5:280(8)(2)(a-d)

<sup>38</sup> 703 KAR 5:280(8)(3)(a-c)

<sup>39</sup> 703 KAR 5:280(6)(3)

<sup>40</sup> KRS 160.346(9), 703 KAR 5:280(9)(1)

- Each superintendent shall adopt evidence-based curriculum and high-quality instructional materials.
  - High-quality instructional materials selected by the superintendent shall be determined by the department to be reliable, valid, and aligned to Kentucky academic standards required by KRS 158.6453 for reading and mathematics.
  - Such materials must be reviewed and approved by the Department prior to purchase.
  - This requirement must be fulfilled within eighteen months from the notice of identification.<sup>41</sup>

### More Rigorous Intervention

- If a school enters CSI status and does not make any annual improvement, as determined by the department, for two (2) consecutive years, or if the school does not exit the status after three (3) years, the school shall enter a school intervention process chosen by the commissioner of education that provides more rigorous support and action by the department to improve the school's performance.<sup>42</sup>
- Schools who fail to exit CSI status after three (3) years or fail to make annual improvement for two (2) consecutive years receive more rigorous intervention (MRI).<sup>43</sup>
  - MRI includes a school audit conducted by KDE, onsite assistance by KDE staff, evaluation and modification of the school turnaround plan, and evaluation of the district's support of the implementation of the turnaround plan.<sup>44</sup>
  - Schools eligible for MRI shall be subject to an audit by the department every two (2) years, or as deemed necessary by the commissioner.<sup>45</sup>
  - Districts serving schools that qualify for more rigorous intervention shall receive additional district audits every three (3) years or as deemed necessary by the commissioner.<sup>46</sup>
- Schools identified for CSI that do not make any annual improvement for two (2) consecutive years or exit that status after three (3) years shall be subject to intervention by the department including but not limited to:<sup>47</sup>
  - A school audit conducted by the department;
  - Onsite assistance by department staff;
  - Evaluation and modification of the school turnaround plan; and
  - Evaluation of the district's support of the implementation of the turnaround plan.

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<sup>41</sup> KRS 160.346(10), 703 KAR 5:280(9)(2)

<sup>42</sup> KRS 160.346(12)

<sup>43</sup> 703 KAR 5:280(10)(1)

<sup>44</sup> 703 KAR 5:280(10)(1)(a-d)

<sup>45</sup> 703 KAR 5:280(10)(2)

<sup>46</sup> 703 KAR 5:280(10)(4)

<sup>47</sup> 703 KAR 5:280(10)(1)(a-d)

## Exit CSI

- Exit criteria shall be established by the Kentucky Board of Education.<sup>48</sup>
- A school identified for CSI shall exit status when:
- it no longer meets the criteria for identification, and
  - it demonstrates progress on the data that served as the basis for identification<sup>49</sup>
- CSI schools identified as a result of more than one criteria shall exit if all relevant exit criteria are met.<sup>50</sup>

## School-Based Decision-Making (SBDM) Council Authority Reinstatement

- Section 16 of 703 KAR 5:280 outlines the procedures for SBDM Council Authority Reinstatement:
  - Within sixty (60) days from the date of eligibility listed in the CSI exit notification letter, the local board of education shall consider the issue of school-based decision-making council authority reinstatement at a regularly scheduled board meeting.
  - Should a local board of education reinstate the council's authority, the school shall hold council elections following the procedures established by the relevant constituent groups prior to the suspension of the council's authority.
  - Should a local board of education decline to reinstate the council's authority, it shall provide the following:
    - A rationale for declining to reinstate the council's authority;
    - A list of criteria that the school must meet in order to seek reconsideration of the decision; and
    - A date at which time the school may seek reconsideration of the decision.
  - Should a local board of education decline to reinstate the council's authority, the advisory leadership team shall remain in place until council authority is reinstated.<sup>51</sup>

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<sup>48</sup> KRS 160.346(11)

<sup>49</sup> 703 KAR 5:280(15)(1)(a-b)

<sup>50</sup> 703 KAR 5:280(15)(3)

<sup>51</sup> 703 KAR 5:280(16)(1-3)

## Appendix A: CSI Timeline

The following timeline outlines the key steps and deadlines for schools and districts identified for Comprehensive Support and Improvement (CSI) in Kentucky. It is designed to help school and district leaders track required actions, understand regulatory expectations, and plan effectively throughout the CSI process. Leaders may use the final column to record their own dates for each milestone, ensuring compliance and supporting successful school improvement efforts.

<b>Action/ Event</b>	<b>Timeline</b>	<b>Date</b>
Identification	Fall (annually)	
Diagnostic Review Dates	Assigned by KDE	
Audit Report Notification	Within 30 days of KDE’s receipt of audit findings	
Advisory Leadership Team Installation	Upon the school’s receipt of the audit report.	
Deadline to Appeal Leadership Capacity Determinations	Within 15 days of the school’s receipt of the audit report	
Turnaround Team Installation and Turnaround Plan Development	Within 45 days of the school’s receipt of the audit report	
Turnaround Plan Implemented	By the first full day of the school year following the school year of identification	
Professional Learning & Curriculum Requirements Implemented	Within 18 months from the notice of identification	
Transition to More Rigorous Intervention (MRI)	After 2 years (if no improvement) or 3 years (if no exit)	

\* *Note: “Days” refers to calendar days.*