



## Local Education Agency Equity Gap Calculation Guidance: Updated March 29, 2019

### Summary

- Consistent with the Every Student Succeeds Act (ESSA), Local Education Agencies (LEAs) submit information on teachers in the Consolidated Grants Application System and via OSSE's annual Faculty and Staff Data Collection as detailed on page 3.
- LEAs who participate in the DC Staffing Data Collaborative will fulfill all of their data collection requirements through their participation in that initiative. For LEAs not participating in the DC Staffing Data Collaborative, reporting will be completed via OSSE's annual Faculty and Staff data collection as well as LEA's Consolidated Grant Application.
- OSSE will use the methodology presented in this guidance to identify and inform LEAs of any equity gaps.
- OSSE identified a pilot cohort of LEAs with teacher equity gaps in May 2018. This pilot cohort<sup>1</sup> of LEAs are required to build LEA Equity Plans and update them for three implementation years.
- During this implementation cycle, OSSE will not require any LEAs outside of this cohort to develop teacher equity plans as a part of their ESSA Consolidated Grant Application.
- OSSE offers supports and resources to all LEAs.

### Background

To ensure that all children receive a high-quality education, the Every Student Succeeds Act (ESSA) requires State Education Agencies (SEAs) and Local Education Agencies (LEAs) to report on equity gaps and work to close them.

The law states that:

"Each State plan shall describe how low-income and minority children enrolled in schools assisted under this part are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers and the measures the State educational agency will use to evaluate and publicly report the progress of the State educational agency with respect to such description..." ESSA §1111(g).

Each local educational agency plan shall describe:

"How the local educational agency will identify and address, as required under State plans as described in section 1111(g)(1)(B), any disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, or out-of-field teachers" ESSA § 1112(b)(2).

### **What are teacher equity gaps?**

A substantial body of education research indicates that teachers are the most important influence on student achievement within schools.<sup>2</sup> As a result, ensuring that all students have access to excellent teachers is necessary to close achievement gaps. Unfortunately, data reveal that there are education systems across the United States with "teacher equity gaps," in which low income or minority students are more likely to be assigned to ineffective, novice, and out of field teachers. As part of OSSE's 2015 [state plan](#) for Equitable Access to Excellent Teachers, OSSE identified such teacher equity gaps in DC as well. Consistent with the ESSA law, LEAs will create plans to address any teacher equity gaps that are identified, with the goal of improving learning for students with the deepest need.

### **How does OSSE calculate teacher equity gaps?**

Using the terms and definitions below, teacher equity gaps are identified where *high minority*, *low income*, and/or *low performing* schools have rates of *ineffective*, *out-of-field* and/or *novice teachers* that are 10 percentage points or greater than the city and/or LEA rates for other schools. See Appendix A for detailed methodology.

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<sup>1</sup> LEAs that do not have gaps identified in May 2019 are excluded from this cohort.

<sup>2</sup> See for example Gordon, Robert, Thomas J. Kane, and Douglas O. Staiger (2006). "Identifying Effective Teachers Using Performance on the Job" Hamilton Project Discussion Paper. Brookings Institution.

## **Terms and Definitions**

Please note the following terms and definitions.

### **Teacher Terms**

<b>Federally Required Term</b>	<b>DC Definition</b>
Ineffective Teacher	Teachers rated on any tier that is below “effective” on an LEA’s teacher evaluation system.
Novice Teacher	A teacher in their first year of teaching, or second year teacher rated “ineffective” (as defined above) in their first year of teaching. <sup>3</sup>
Out-of-Field Teacher	Teachers who do not have a major, certification, or an “effective” teacher evaluation designation in the subject which they are teaching, with the exception of special education teachers. For special education teachers, an out-of-field teacher is defined as a teacher who has not met the requirements <sup>4</sup> outlined in OSSE's SPED certification policy. Requirements are described in <a href="#">OSSE's Dear Colleague letter</a> dated April 5, 2016.

### **School Terms**

<b>Federally Required Term</b>	<b>DC Definition</b>
High Minority School	A school where 95 percent or more of the students are racial or ethnic minorities. Please note: a student who is a racial or ethnic minority includes a student who is Black/African-American, Hispanic/Latino of any race, Asian/Asian-American, Two or more races, American Indian/Alaskan Native, or Hawaiian Native/Pacific Islander.
Low Income School	A school where 50 percent or more of students qualify for the Temporary Assistance for Needy Families (TANF) program, the Supplemental Nutrition Assistant Program (SNAP), are homeless, or are Wards of the state through the Child and Family Services Agency (CFSA).
Low-Performing School <sup>5</sup>	A school in the bottom ten percent of schools in the STAR Framework, identified by framework. <sup>6</sup>

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<sup>3</sup> This definition is updated from the previous guidance for clarity.

<sup>4</sup> These are: (1) obtained full certification as a special education teacher (including certification obtained through alternative routes to certification), or passed the State special education teacher licensing examination and holds a license to teach in the State as a special education teacher (does not apply to charter LEAs); (2) has not had special education certification or licensure requirements waived on an emergency, temporary, or provisional basis (does not apply to charter LEAs); and (3) holds at least a bachelor's degree.

<sup>5</sup> Note: Low Performing School is not a Federally Required Term under ESSA. OSSE has chosen to include this term, as noted in the 2015 DC State Plan for Equitable Access to Excellent Educators.

<sup>6</sup> This definition was revised as a result of the implementation of the new STAR Framework for state accountability and the ESSA defined School Improvement designations implemented which were not in existence in prior years.

## What is required of LEAs?

**1. LEAs report teacher-level Faculty and Staff data for the prior school year.** To meet the requirements for the annual Consolidated Grant Application, LEAs will also report the below school-level data<sup>7</sup> for the prior school year. OSSE will use these data along with certified student-level data to identify whether low income and minority students are disproportionately served by novice, ineffective, and/or out-of-field teachers. The rubric will be available in a spreadsheet within the ESEA Consolidated Grant Application. LEAs participating in the Staffing Data Collaborative fulfill this requirement through their participation in that initiative.

	Total number of teachers in the school	Novice	Out-of-field	Rating on LEA's approved teacher evaluation system		
				Highly Effective: <i>Only include teachers rated in the highest evaluation tier in this category</i>	Effective: <i>Include teachers rated "effective" or above but not in the highest evaluation tier in this category</i>	Below Effective: <i>Include any teachers rated on an evaluation tier that is lower than "effective," (e.g. partially effective, minimally effective, not effective) in this category</i>
School A						
School B						

**2. LEAs receive a teacher equity data notification letter.** In the notification letter, OSSE reports to each LEA whether there are teacher equity gaps identified at any of their schools (see Appendix A for methodology). The letter provides a data summary of teacher equity gaps in schools within the LEA, in the context of city and LEA trends. The communication additionally provides an outline of the optional state-level supports focused on talent, including technical assistance, community of practice, and professional development opportunities available to support LEAs and schools in addressing teacher equity gaps.

**3. LEAs with identified schools submit equity plans:** Notified LEAs will be given until the submission date of the following year's Consolidated Grant Application to conduct a root cause analysis on the challenges in attracting and retaining excellent teachers in their schools and identify strategies to address teacher equity gaps.

The templates for completing the LEA Equity Plans and LEA Equity Plan updates can be found under the heading *OSSE Guidance and Rubrics* on OSSE's Equitable Access to Excellent Educators website at <https://osse.dc.gov/page/equitable-access-excellent-educators>. The rubric used to provide feedback to LEAs and to determine approval status of LEA Equity Plans and LEA Equity Plan Updates in the ESEA Consolidated Grant Application system can be found under the same heading.

**4. LEAs with identified schools will provide updates:** For the three years following submission of the initial LEA Equity Plan, LEAs will provide LEA Equity Plan Updates within their Consolidated Grant Application. LEAs that submitted an LEA Equity Plan in their 2018 Consolidated Grants Application and were identified as having teacher equity gaps in spring of 2019<sup>8</sup> can expect the following:

<sup>7</sup> LEAs participating in the Staffing Data Collaborative fulfill this requirement through their participation in that initiative. LEAs not participating in the Staffing Data Collaborative fulfill this requirement through completion of the annual OSSE Faculty and Staff Data collection and the Consolidated Grant Application. LEAs will be required to reconcile observed discrepancies between teacher-level data submitted to OSSE and school-level data submitted through the Consolidated Grant Application.

<sup>8</sup> LEAs that received an identification letter in May 2018 and are not identified as having gaps in 2019 are excluded from the requirement to submit updates for three implementation years. Thereafter, a change in LEA data during the three implementation years does not waive the requirement to submit an update.

Identification and Initial Submission	Year 1: First School Year of Implementation	Year 2: Second School Year of Implementation	Year 3: Third School Year of Implementation
<ul style="list-style-type: none"> <li>• <b>Spring:</b> LEAs with teacher equity are notified</li> <li>• <b>Spring/Summer:</b> LEAs are offered technical assistance to support equity planning.</li> <li>• <b>Sept. 30:</b> LEAs submit their initial <a href="#">LEA Equity Plan</a> into their ESEA Consolidated Grant Application for review via the <a href="#">LEA Equity Plan Rubric</a>.</li> <li>• <b>Fall:</b> LEAs make any revisions needed in response to feedback.</li> <li>• <b>Dec. 31:</b> LEAs submit an approved <a href="#">LEA Equity Plan</a> into their Final ESEA Consolidated Grant Applications by Dec 31.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>School Year:</b> LEAs implement plans, and are offered technical assistance opportunities.</li> <li>• <b>Spring:</b> LEAs with teacher equity gaps are notified.</li> <li>• <b>Sept. 30:</b> After the first implementation year, rolling formal review of <a href="#">LEA Equity Plan Updates</a> begins. LEAs submit <a href="#">LEA Equity Plan Updates</a> to <a href="mailto:osse.teacherequity@dc.gov">osse.teacherequity@dc.gov</a> and <a href="mailto:Con.App@dc.gov">Con.App@dc.gov</a> for review via the <a href="#">LEA Equity Plan Rubric</a>.</li> <li>• <b>Fall:</b> LEAs receive a response with their approval status, and formative feedback on optional sections submitted. LEAs make revisions, and resend responses for additional round(s) of review if needed.</li> <li>• <b>Dec. 31:</b> LEAs must submit an approved <a href="#">LEA Equity Plan Update</a> in their Final ESEA Consolidated Grant Application by Dec 31.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>School Year:</b> LEAs implement plans, and are offered technical assistance opportunities.</li> <li>• <b>Sept. 30:</b> After the second implementation year, rolling formal review of <a href="#">LEA Equity Plan Updates</a> begins. LEAs submit <a href="#">LEA Equity Plan Updates</a> to <a href="mailto:osse.teacherequity@dc.gov">osse.teacherequity@dc.gov</a> and <a href="mailto:Con.App@dc.gov">Con.App@dc.gov</a> for review via the <a href="#">LEA Equity Plan Rubric</a>.</li> <li>• <b>Fall:</b> LEAs receive a response with their approval status, and formative feedback on optional sections submitted. LEAs make revisions, and resend responses for additional round(s) of review if needed.</li> <li>• <b>Dec. 31:</b> LEAs must submit an approved <a href="#">LEA Equity Plan Update</a> in their Final ESEA Consolidated Grant Application by Dec 31.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>School Year:</b> LEAs implement plans, and are offered technical assistance opportunities.</li> <li>• <b>Sept. 30:</b> After the third implementation year, rolling formal review of <a href="#">LEA Equity Plan Updates</a> begins. LEAs submit <a href="#">LEA Equity Plan Updates</a> to <a href="mailto:osse.teacherequity@dc.gov">osse.teacherequity@dc.gov</a> and <a href="mailto:Con.App@dc.gov">Con.App@dc.gov</a> for review via the <a href="#">LEA Equity Plan Rubric</a>.</li> <li>• <b>Fall:</b> LEAs receive a response with their approval status, as well as formative feedback on all optional sections submitted. LEAs make revisions, and resend responses for additional round(s) of review if needed.</li> <li>• <b>Dec. 31:</b> LEAs must submit an approved <a href="#">LEA Equity Plan Update</a> in their Final ESEA Consolidated Grant Application by Dec 31.</li> </ul>

During this implementation cycle, OSSE will not require any LEAs outside of this pilot cohort to develop or update teacher equity plans as a part of their ESEA Consolidated Grant Application.

### Support for LEAs

OSSE provides technical assistance to LEAs across all stages of plan development, including calculating rates, identifying equity gaps, determining the causes of gaps, identifying and implementing strategies, monitoring progress, and submitting approvable materials in the Consolidated Grant Application. For example, the Teaching and Learning division offers the following types of optional support:

- Peer-to-Peer Community of Practice sessions
- Large Group Convenings, with focuses such as:
  - Driving improvement in LEA talent pipelines, via addressing educator recruitment, educator development and equitable talent systems
  - Strategic equity planning
- Small group or 1:1 technical assistance sessions, tailored to the specific needs of LEAs and schools
- LEA Equity plan review office hours

Please refer to OSSE's Equitable Access to Excellent Educators website for information around offerings. Please do not hesitate to reach out with questions or feedback, for a technical assistance request, or to attend a teacher equity convening or community of practice. Please contact OSSE's Teaching and Learning division by contacting Rose Goff at [Rose.Goff@dc.gov](mailto:Rose.Goff@dc.gov) or La' Shawndra Scroggins at [LaShawndra.Scroggins@dc.gov](mailto:LaShawndra.Scroggins@dc.gov).

## The DC Staffing Collaborative

OSSE also offers participation in the DC Staffing Collaborative, an optional support available to LEAs free of charge, as a pathway where LEAs can fully comply with data collection requirements while minimizing the work required.

The DC Staffing Collaborative is a voluntary partnership between LEAs, a research organization, and OSSE that is designed to help LEAs use data to develop a strategic staffing policy to attract and retain excellent teachers. Participants receive comprehensive reports tailored to their LEA from TNTP, a research organization. Reports include findings from the Insight survey, federally mandated staffing data, and other LEA-identified indicators. Currently over 90 percent of schools in the District benefit from participation in this project.

The benefits that LEAs receive for participating in this fully funded project include:

1. **LEA Leadership:** LEAs decide together what data, in addition to what is federally required, is most important for collection and analysis.
2. **Avoiding Unnecessary Requirements:** Collecting only data elements that have a defined purpose and for which LEAs receive something in return.
3. **Robust analysis for strategic staffing:** LEAs receive TNTP's analysis of teacher-level data around pipelines, preparation, demand and supply, licensure, placement, retention, evaluation, compensation, and other relevant aspects of the teaching profession in DC. LEAs receive confidential analysis of their own LEA data, as well as aggregate analysis of DC data for comparison.
4. **Strategic staffing recommendations:** LEAs receive TNTP's inferences and conclusions that LEAs can use to develop data-driven staffing policies. The data collection will be for LEA use only.

To learn more about the Collaborative, contact Laura Montas at [Laura.Montas@dc.gov](mailto:Laura.Montas@dc.gov).

## Appendix A: Methodology for School Level Equity Gap Calculations

The following terms and definitions will be used.

### Teacher Terms

Federally Required Term	DC Definition
Ineffective Teacher	Teachers rated on any tier that is below “effective” on an LEA’s teacher evaluation system.
Novice Teacher	A teacher in their first year of teaching, or second year teacher rated “ineffective” (as defined above) in their first year of teaching. <sup>9</sup>
Out-of-Field Teacher	Teachers who do not have a major, certification, or an “effective” teacher evaluation designation in the subject which they are teaching, with the exception of special education teachers. For special education teachers, an out-of-field teacher is defined as a teacher who has not met the requirements <sup>10</sup> outlined in OSSE’s SPED certification policy. Requirements are described in <a href="#">OSSE's Dear Colleague letter</a> dated April 5, 2016.

### School Terms

Federally Required Term	DC Definition
High Minority School	A school where 95 percent or more of the students are racial or ethnic minorities. Please note: a student who is a racial or ethnic minority includes a student who is Black/African-American, Hispanic/Latino of any race, Asian/Asian-American, Two or more races, American Indian/Alaskan Native, or Hawaiian Native/Pacific Islander.

<sup>9</sup> This definition is updated from the previous guidance for clarity.

<sup>10</sup> These are: (1) obtained full certification as a special education teacher (including certification obtained through alternative routes to certification), or passed the State special education teacher licensing examination and holds a license to teach in the State as a special education teacher (does not apply to charter LEAs); (2) has not had special education certification or licensure requirements waived on an emergency, temporary, or provisional basis (does not apply to charter LEAs); and (3) holds at least a bachelor’s degree.

Low Income School	A school where 50 percent or more of students qualify for the Temporary Assistance for Needy Families (TANF) program, the Supplemental Nutrition Assistant Program (SNAP), are homeless, or are Wards of the state through the Child and Family Services Agency (CFSA).
Low-Performing School <sup>11</sup>	A school in the bottom ten percent of schools in the STAR Framework, identified by framework. <sup>12</sup>

Please note: to be included, a school must have more than a minimum n-size of 10 teachers.

### Steps for calculating teacher equity gaps:

**1. LEAs report teacher-level Faculty and Staff data for the prior school year.** LEAs may fulfill the reporting requirement through participation in the Staffing Data Collaborative. LEAs that are not participating in the Staffing Data Collaborative are required to complete OSSE's annual Faculty and Staff data collection as well as to submit the following information by school to OSSE through the Consolidated Grant Application.

Example LEA:

	Total number of teachers in the school	Novice	Out-of-field	Rating on LEA's approved teacher evaluation system		
				Highly Effective: <i>Include teachers rated in the highest evaluation tier in this category</i>	Effective: <i>Include teachers rated "effective" or above but not in the highest evaluation tier in this category</i>	Below Effective: <i>Include any teachers rated on an evaluation tier that is lower than "effective," (e.g., partially effective, minimally effective, not effective) in this category</i>
School A						
School B						

<sup>11</sup> Note: Low Performing School is not a Federally Required Term under ESSA. OSSE has chosen to include this term, as noted in the 2015 DC State Plan for Equitable Access to Excellent Educators.

<sup>12</sup> This definition was revised as a result of the implementation of the new STAR Framework for state accountability and the ESSA defined School Improvement designations implemented which were not in existence in prior years.

**2. OSSE Classifies Schools and Calculates Teacher Equity Gaps:** OSSE will use student-level data certified through the annual Data Validation process along with data from the STAR Framework to classify schools as low-income, high minority and low performing, per the definitions above. OSSE will provide to LEAs documentation that confirms which schools in each LEA are classified as high-minority, low-income, and/or low-performing. OSSE will use these classifications in conjunction with: (a) Faculty and Staff data collected through the Staffing Collaborative, (b) OSSE’s annual Faculty and Staff data collection, and (c) the aforementioned chart in the ESEA Consolidated Grant Application system to calculate teacher equity gaps, according to the percentage of teachers at each school who are ineffective, novice, and out-of-field, per the definitions above. Results from this teacher equity gap analysis will be shared with LEAs through a notification letter detailing school level gaps as compared to city and LEA rates.

	Rates for Individual LEA schools <i>Low income, high minority, low performing</i>	–	Aggregate Rates at Citywide Schools <i>Non-low income, non-high minority, non-low performing</i>	=	Teacher Equity Gaps
For each low income school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of ineffective teachers in non – low income schools across the city}}{\text{Total number of teachers in non – low income schools across the city}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of novice teachers in non – low income schools across the city}}{\text{Total number of teachers in non – low income schools across the city}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of out of field teachers in non – low income schools across the city}}{\text{Total number of teachers in non – low income schools across the city}}$		
For each high minority school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of ineffective teachers in non – high minority schools across the city}}{\text{Total number of teachers in non – high minority schools across the city}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of novice teachers in non – high minority schools across the city}}{\text{Total number of teachers in non – high minority schools across the city}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of out of field teachers in non – high minority schools across the city}}{\text{Total number of teachers in non – high minority schools across the city}}$		
For each low performing school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of ineffective teachers in non – low performing schools across the city}}{\text{Total number of teachers in non – low performing schools across the city}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of novice teachers in non – low performing schools across the city}}{\text{Total number of teachers in non – low performing schools across the city}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	–	$\frac{\text{Number of out of field teachers in non – low performing schools across the city}}{\text{Total number of teachers in non – low performing schools across the city}}$		



**3. OSSE Reports Within-LEA Gaps:** For LEAs with multiple schools, at least one of which is in the state-level comparison group, OSSE will calculate within-LEA teacher equity gaps by income,<sup>13</sup> minority<sup>14</sup> and performance<sup>15</sup> classifications, and return the information to LEAs in the letter described above.

	Rates for Individual LEA schools <i>Low income, high minority, low performing</i>	—	Aggregate Rates at LEA Schools <i>Non-low income, non-high minority, non-low performing</i>	=	Teacher Equity Gaps
For each low income school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of ineffective teachers in non — low income schools in the LEA}}{\text{Total number of teachers in non — low income schools in the LEA}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of novice teachers in non — low income schools in the LEA}}{\text{Total number of teachers in non — low income schools in the LEA}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of out of field teachers in non — low income schools in the LEA}}{\text{Total number of teachers in non — low income schools in the LEA}}$		
For each high minority school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of ineffective teachers in non — high minority schools in the LEA}}{\text{Total number of teachers in non — high minority schools in the LEA}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of novice teachers in non — high minority schools in the LEA}}{\text{Total number of teachers in non — high minority schools in the LEA}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of out of field teachers in non — high minority schools in the LEA}}{\text{Total number of teachers in non — high minority schools in the LEA}}$		
For each low performing school in the LEA	$\frac{\text{Number of ineffective teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of ineffective teachers in non — low performing schools in the LEA}}{\text{Total number of teachers in non — low performing schools in the LEA}}$		<b>Identified Gaps</b> Gaps will be identified where differences are greater than 10 percent
	$\frac{\text{Number of novice teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of novice teachers in non — low performing schools in the LEA}}{\text{Total number of teachers in non — low performing schools in the LEA}}$	=	
	$\frac{\text{Number of out of field teachers}}{\text{Total number of teachers}}$	—	$\frac{\text{Number of out of field teachers in non — low performing schools in the LEA}}{\text{Total number of teachers in non — low performing schools in the LEA}}$		

<sup>13</sup> This step is only applicable to LEAs with at least one low income school and at least one non-low income school.

<sup>14</sup> This step is only applicable to LEAs with at least one high minority school and at least one non-high minority school.

<sup>15</sup> This step is only applicable to LEAs with at least one low performing school and at least one non-low performing school.