

Hillsborough County Public Schools

Bevis Elementary School



2023-24

Schoolwide Improvement Plan (SIP)

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Bevis Elementary School

5720 OSPREY RIDGE DR, Lithia, FL 33547

[no web address on file]

SIP Authority

Section 1001.42(18), Florida Statutes (F.S.), requires district school boards to annually approve and require implementation of a new, amended, or continuation SIP for each school in the district which has a school grade of D or F; has a significant gap in achievement on statewide, standardized assessments administered pursuant to s. 1008.22 by one or more student subgroups, as defined in the federal Elementary and Secondary Education Act (ESEA), 20 U.S.C. s. 6311(b)(2)(C)(v)(II); has not significantly increased the percentage of students passing statewide, standardized assessments; has not significantly increased the percentage of students demonstrating Learning Gains, as defined in s. 1008.34, and as calculated under s. 1008.34(3)(b), who passed statewide, standardized assessments; has been identified as requiring instructional supports under the Reading Achievement Initiative for Scholastic Excellence (RAISE) program established in s. 1008.365; or has significantly lower graduation rates for a subgroup when compared to the state's graduation rate. Rule 6A-1.098813, Florida Administrative Code (F.A.C.), requires district school boards to approve a SIP for each Department of Juvenile Justice (DJJ) school in the district rated as Unsatisfactory.

Below are the criteria for identification of traditional public and public charter schools pursuant to the Every Student Succeeds Act (ESSA) State plan:

Additional Target Support and Improvement (ATSI)

A school not identified for CSI or TSI, but has one or more subgroups with a Federal Index below 41%.

Targeted Support and Improvement (TSI)

A school not identified as CSI that has at least one consistently underperforming subgroup with a Federal Index below 32% for three consecutive years.

Comprehensive Support and Improvement (CSI)

A school can be identified as CSI in any of the following four ways:

1. Have an overall Federal Index below 41%;
2. Have a graduation rate at or below 67%;
3. Have a school grade of D or F; or
4. Have a Federal Index below 41% in the same subgroup(s) for 6 consecutive years.

ESEA sections 1111(d) requires that each school identified for ATSI, TSI or CSI develop a support and improvement plan created in partnership with stakeholders (including principals and other school leaders, teachers and parent), is informed by all indicators in the State's accountability system, includes evidence-based interventions, is based on a school-level needs assessment, and identifies resource inequities to be addressed through implementation of the plan. The support and improvement plans for schools identified as TSI, ATSI and non-Title I CSI must be approved and monitored by the school district. The support and improvement plans for schools identified as Title I, CSI must be approved by the school district and

Department. The Department must monitor and periodically review implementation of each CSI plan after approval.

The Department's SIP template in the Florida Continuous Improvement Management System (CIMS), <https://www.floridacims.org>, meets all state and rule requirements for traditional public schools and incorporates all ESSA components for a support and improvement plan required for traditional public and public charter schools identified as CSI, TSI and ATSI, and eligible schools applying for Unified School Improvement Grant (UniSIG) funds.

Districts may allow schools that do not fit the aforementioned conditions to develop a SIP using the template in CIMS.

The responses to the corresponding sections in the Department's SIP template may address the requirements for: 1) Title I schools operating a schoolwide program (SWD), pursuant to ESSA, as amended, Section 1114(b); and 2) charter schools that receive a school grade of D or F or three consecutive grades below C, pursuant to Rule 6A-1.099827, F.A.C. The chart below lists the applicable requirements.

SIP Sections	Title I Schoolwide Program	Charter Schools
I-A: School Mission/Vision		6A-1.099827(4)(a)(1)
I-B-C: School Leadership, Stakeholder Involvement & SIP Monitoring	ESSA 1114(b)(2-3)	
I-E: Early Warning System	ESSA 1114(b)(7)(A)(iii)(III)	6A-1.099827(4)(a)(2)
II-A-C: Data Review		6A-1.099827(4)(a)(2)
II-F: Progress Monitoring	ESSA 1114(b)(3)	
III-A: Data Analysis/Reflection	ESSA 1114(b)(6)	6A-1.099827(4)(a)(4)
III-B: Area(s) of Focus	ESSA 1114(b)(7)(A)(i-iii)	
III-C: Other SI Priorities		6A-1.099827(4)(a)(5-9)
VI: Title I Requirements	ESSA 1114(b)(2, 4-5), (7)(A)(iii)(I-V)-(B) ESSA 1116(b-g)	

Note: Charter schools that are also Title I must comply with the requirements in both columns.

Purpose and Outline of the SIP

The SIP is intended to be the primary artifact used by every school with stakeholders to review data, set goals, create an action plan and monitor progress. The Department encourages schools to use the SIP as a “living document” by continually updating, refining and using the plan to guide their work throughout the year. This printed version represents the SIP as of the "Date Modified" listed in the footer.

I. School Information

School Mission and Vision

Provide the school's mission statement.

All students will maximize their potential for learning and acquire skills necessary for success in the 21st century.

Provide the school's vision statement.

Colleen Bevis Elementary will be a top performing school in Hillsborough County.

School Leadership Team, Stakeholder Involvement and SIP Monitoring

School Leadership Team

For each member of the school leadership team, select the employee name and email address from the dropdown. Identify the position title and job duties/responsibilities as it relates to SIP implementation for each member of the school leadership team.:

Name	Position Title	Job Duties and Responsibilities
Thoms, Rebecca	Principal	Leads ILT, administration, plans professional development
Boudreau, Charlena	Assistant Principal	Co-chair of ILT, supports principals, testing
Kittlesen, Karen	Teacher, K-12	Teacher, SAC Chair,
MacDonald, Circe	Teacher, K-12	Gifted Teacher, SAC Chair, Science Hub Sponsor
Crosson, Leigh	Teacher, K-12	Grade 5 Teacher
Dasta, Kristin	Teacher, K-12	Grade 4 Teacher
LeSavage, Jamie	Teacher, K-12	Grade 3 Teacher
Denton, Gabriela	Teacher, K-12	Grade 2 Teacher
Gaffney, Kellie	Teacher, K-12	Grade 1 Teacher
Tiffany, Rebecca	School Counselor	Responsible for 504, monthly guidance classroom lessons, ESE/AGP paperwork, ILT member
Batchelder, Michele	Teacher, ESE	ESE Teacher
Peacock, Ian	Teacher, K-12	Music Teacher

Stakeholder Involvement and SIP Development

Describe the process for involving stakeholders (including the school leadership team, teachers and school staff, parents, students (mandatory for secondary schools) and families, and business or community leaders) and how their input was used in the SIP development process. (ESSA 1114(b)(2))

Note: If a School Advisory Council is used to fulfill these requirements, it must include all required stakeholders.

During Pre-planning, faculty and stakeholders met to review data and plan action steps to create the School Improvement Plan. The 2023-2024 SAC committee met during pre-planning days to discuss and vote on the SIP and standard waivers. Faculty viewed and discussed standards waivers and voted electronically.

SIP Monitoring

Describe how the SIP will be regularly monitored for effective implementation and impact on increasing the achievement of students in meeting the State’s academic standards, particularly for those students with the greatest achievement gap. Describe how the school will revise the plan, as necessary, to ensure continuous improvement. (ESSA 1114(b)(3))

ILt members meet monthly and PLC/grade level teams meet twice a month to review data and continue progress monitoring of student achievement.

Demographic Data

Only ESSA identification and school grade history updated 3/11/2024

2023-24 Status (per MSID File)	Active
School Type and Grades Served (per MSID File)	Elementary School PK-5
Primary Service Type (per MSID File)	K-12 General Education
2022-23 Title I School Status	No
2022-23 Minority Rate	38%
2022-23 Economically Disadvantaged (FRL) Rate	18%
Charter School	No
RAISE School	No
ESSA Identification *updated as of 3/11/2024	N/A
Eligible for Unified School Improvement Grant (UniSIG)	No
2021-22 ESSA Subgroups Represented (subgroups with 10 or more students) (subgroups below the federal threshold are identified with an asterisk)	Students With Disabilities (SWD) English Language Learners (ELL) Asian Students (ASN) Black/African American Students (BLK) Hispanic Students (HSP) Multiracial Students (MUL) White Students (WHT) Economically Disadvantaged Students (FRL)
School Grades History *2022-23 school grades will serve as an informational baseline.	2021-22: A 2019-20: A 2018-19: A 2017-18: A
School Improvement Rating History	
DJJ Accountability Rating History	

Early Warning Systems

Using 2022-23 data, complete the table below with the number of students by current grade level that exhibit each early warning indicator listed:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Absent 10% or more days	17	15	12	8	9	0	0	0	0	61
One or more suspensions	0	1	0	0	1	0	0	0	0	2
Course failure in English Language Arts (ELA)	0	0	0	0	0	0	0	0	0	
Course failure in Math	0	0	0	0	0	0	0	0	0	
Level 1 on statewide ELA assessment	0	0	0	6	6	1	0	0	0	13
Level 1 on statewide Math assessment	0	0	0	3	7	1	0	0	0	11
Number of students with a substantial reading deficiency as defined by Rule 6A-6.0531, F.A.C.	0	0	0	4	6	8	0	0	0	18

Using the table above, complete the table below with the number of students by current grade level that have two or more early warning indicators:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Students with two or more indicators	1	0	0	1	2	0	0	0	0	4

Using the table above, complete the table below with the number of students identified retained:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Retained Students: Current Year	0	0	0	0	0	0	0	0	0	
Students retained two or more times	0	0	0	0	0	0	0	0	0	

Prior Year (2022-23) As Initially Reported (pre-populated)

The number of students by grade level that exhibited each early warning indicator:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Absent 10% or more days	1	21	9	7	8	10	0	0	0	56
One or more suspensions	0	0	0	1	0	0	0	0	0	1
Course failure in ELA	0	0	0	3	4	7	0	0	0	14
Course failure in Math	0	0	0	3	7	9	0	0	0	19
Level 1 on statewide ELA assessment	0	0	0	3	4	7	0	0	0	14
Level 1 on statewide Math assessment	0	0	0	3	7	9	0	0	0	19
Number of students with a substantial reading deficiency as defined by Rule 6A-6.0531, F.A.C.	10	12	5	3	4	7	0	0	0	41

The number of students by current grade level that had two or more early warning indicators:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Students with two or more indicators	0	0	1	0	0	0	0	0	0	1

The number of students identified retained:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Retained Students: Current Year	2	0	1	0	0	0	0	0	0	3
Students retained two or more times	0	0	0	0	0	0	0	0	0	0

Prior Year (2022-23) Updated (pre-populated)

Section 3 includes data tables that are pre-populated based off information submitted in prior year's SIP.

The number of students by grade level that exhibited each early warning indicator:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Absent 10% or more days	1	21	9	7	8	10	0	0	0	56
One or more suspensions	0	0	0	1	0	0	0	0	0	1
Course failure in ELA	0	0	0	3	4	7	0	0	0	14
Course failure in Math	0	0	0	3	7	9	0	0	0	19
Level 1 on statewide ELA assessment	0	0	0	3	4	7	0	0	0	14
Level 1 on statewide Math assessment	0	0	0	3	7	9	0	0	0	19
Number of students with a substantial reading deficiency as defined by Rule 6A-6.0531, F.A.C.	10	12	5	3	4	7	0	0	0	41

The number of students by current grade level that had two or more early warning indicators:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Students with two or more indicators	0	0	1	0	0	0	0	0	0	1

The number of students identified retained:

Indicator	Grade Level									Total
	K	1	2	3	4	5	6	7	8	
Retained Students: Current Year	2	0	1	0	0	0	0	0	0	3
Students retained two or more times	0	0	0	0	0	0	0	0	0	0

II. Needs Assessment/Data Review

ESSA School, District and State Comparison (pre-populated)

Please note that the district and state averages shown here represent the averages for similar school types (elementary, middle, high school or combination schools). Each "blank" cell indicates the school had less than 10 eligible students with data for a particular component and was not calculated for the school.

On April 9, 2021, FDOE Emergency Order No. 2021-EO-02 made 2020-21 school grades optional. They have been removed from this publication.

Accountability Component	2023			2022			2021		
	School	District	State	School	District	State	School	District	State
ELA Achievement*	83	50	53	86	53	56	87		
ELA Learning Gains				73			70		
ELA Lowest 25th Percentile				68			59		
Math Achievement*	89	56	59	91	50	50	88		
Math Learning Gains				86			77		
Math Lowest 25th Percentile				74			63		
Science Achievement*	86	50	54	85	59	59	79		
Social Studies Achievement*					69	64			
Middle School Acceleration					56	52			
Graduation Rate					48	50			
College and Career Acceleration						80			
ELP Progress	33	59	59	70			60		

* In cases where a school does not test 95% of students in a subject, the achievement component will be different in the Federal Percent of Points Index (FPPI) than in school grades calculation.

See [Florida School Grades, School Improvement Ratings and DJJ Accountability Ratings](#).

ESSA School-Level Data Review (pre-populated)

2021-22 ESSA Federal Index	
ESSA Category (CSI, TSI or ATSI)	N/A
OVERALL Federal Index – All Students	76
OVERALL Federal Index Below 41% - All Students	No
Total Number of Subgroups Missing the Target	0
Total Points Earned for the Federal Index	378
Total Components for the Federal Index	5
Percent Tested	100
Graduation Rate	

2021-22 ESSA Federal Index	
ESSA Category (CSI, TSI or ATSI)	N/A
OVERALL Federal Index – All Students	79

2021-22 ESSA Federal Index	
OVERALL Federal Index Below 41% - All Students	No
Total Number of Subgroups Missing the Target	0
Total Points Earned for the Federal Index	633
Total Components for the Federal Index	8
Percent Tested	99
Graduation Rate	

ESSA Subgroup Data Review (pre-populated)

2022-23 ESSA SUBGROUP DATA SUMMARY				
ESSA Subgroup	Federal Percent of Points Index	Subgroup Below 41%	Number of Consecutive years the Subgroup is Below 41%	Number of Consecutive Years the Subgroup is Below 32%
SWD	59			
ELL	58			
AMI				
ASN	82			
BLK	73			
HSP	83			
MUL	82			
PAC				
WHT	88			
FRL	76			

2021-22 ESSA SUBGROUP DATA SUMMARY				
ESSA Subgroup	Federal Percent of Points Index	Subgroup Below 41%	Number of Consecutive years the Subgroup is Below 41%	Number of Consecutive Years the Subgroup is Below 32%
SWD	56			
ELL	81			
AMI				
ASN	89			
BLK	78			
HSP	83			

2021-22 ESSA SUBGROUP DATA SUMMARY				
ESSA Subgroup	Federal Percent of Points Index	Subgroup Below 41%	Number of Consecutive years the Subgroup is Below 41%	Number of Consecutive Years the Subgroup is Below 32%
MUL	84			
PAC				
WHT	79			
FRL	70			

Accountability Components by Subgroup

Each “blank” cell indicates the school had less than 10 eligible students with data for a particular component and was not calculated for the school. (pre-populated)

2022-23 ACCOUNTABILITY COMPONENTS BY SUBGROUPS												
Subgroups	ELA Ach.	ELA LG	ELA LG L25%	Math Ach.	Math LG	Math LG L25%	Sci Ach.	SS Ach.	MS Accel.	Grad Rate 2021-22	C & C Accel 2021-22	ELP Progress
All Students	83			89			86					33
SWD	55			62			43				4	
ELL	74			68							3	33
AMI												
ASN	88			84			75				3	
BLK	69			77							2	
HSP	79			83			90				4	
MUL	80			83			82				3	
PAC												
WHT	84			92			86				4	
FRL	71			69			78				4	

2021-22 ACCOUNTABILITY COMPONENTS BY SUBGROUPS												
Subgroups	ELA Ach.	ELA LG	ELA LG L25%	Math Ach.	Math LG	Math LG L25%	Sci Ach.	SS Ach.	MS Accel.	Grad Rate 2020-21	C & C Accel 2020-21	ELP Progress
All Students	86	73	68	91	86	74	85					70
SWD	56	62	47	73	64	53	38					
ELL	77	73		91	93							70
AMI												
ASN	89	82		92	88		92					

2021-22 ACCOUNTABILITY COMPONENTS BY SUBGROUPS												
Subgroups	ELA Ach.	ELA LG	ELA LG L25%	Math Ach.	Math LG	Math LG L25%	Sci Ach.	SS Ach.	MS Accel.	Grad Rate 2020-21	C & C Accel 2020-21	ELP Progress
BLK	73			82								
HSP	83	67	83	88	90	80	90					
MUL	87	58		94	95							
PAC												
WHT	87	76	66	91	84	71	81					
FRL	71	72	78	74	71	57	68					

2020-21 ACCOUNTABILITY COMPONENTS BY SUBGROUPS												
Subgroups	ELA Ach.	ELA LG	ELA LG L25%	Math Ach.	Math LG	Math LG L25%	Sci Ach.	SS Ach.	MS Accel.	Grad Rate 2019-20	C & C Accel 2019-20	ELP Progress
All Students	87	70	59	88	77	63	79					60
SWD	53	52	63	57	57	60	44					
ELL	83	83		83	83		75					60
AMI												
ASN	84			88								
BLK	85			75								
HSP	85	65	55	81	68	36	79					
MUL	92			92								
PAC												
WHT	88	69	58	91	80	75	80					
FRL	78	68		75	68		75					

Grade Level Data Review– State Assessments (pre-populated)

The data are raw data and include ALL students who tested at the school. This is not school grade data. The percentages shown here represent ALL students who received a score of 3 or higher on the statewide assessments.

An asterisk (*) in any cell indicates the data has been suppressed due to fewer than 10 students tested, or all tested students scoring the same.

ELA						
Grade	Year	School	District	School-District Comparison	State	School-State Comparison
05	2023 - Spring	86%	53%	33%	54%	32%
04	2023 - Spring	84%	54%	30%	58%	26%

ELA						
Grade	Year	School	District	School-District Comparison	State	School-State Comparison
03	2023 - Spring	85%	46%	39%	50%	35%

MATH						
Grade	Year	School	District	School-District Comparison	State	School-State Comparison
03	2023 - Spring	96%	55%	41%	59%	37%
04	2023 - Spring	88%	59%	29%	61%	27%
05	2023 - Spring	90%	53%	37%	55%	35%

SCIENCE						
Grade	Year	School	District	School-District Comparison	State	School-State Comparison
05	2023 - Spring	85%	47%	38%	51%	34%

III. Planning for Improvement

Data Analysis/Reflection
 Answer the following reflection prompts after examining any/all relevant school data sources.

Which data component showed the lowest performance? Explain the contributing factor(s) to last year's low performance and discuss any trends.

Based on 22-23 year end data for FAST ELA assessment, our lowest percentile of mastery was in 4th grade with 84%. Fifth grade mastery of science (FSSA) was at 85%. Both of these percentages were aligned with previous year achievement scores and continue to trend above district averages.

Which data component showed the greatest decline from the prior year? Explain the factor(s) that contributed to this decline.

As 22-23 was the first year of the new assessment, there are no declines to note. We have maintained or gained in each category.

Which data component had the greatest gap when compared to the state average? Explain the factor(s) that contributed to this gap and any trends.

All gaps noticed showed Bevis trending higher or above than the district. Specifically, 3rd grade ELA (Bevis = 85%, Hillsborough 45%) Math (Bevis 96%, Hillsborough = 55%). Similarly, 5th grade science (Bevis 85% mastery, Hillsborough = 47%).

Which data component showed the most improvement? What new actions did your school take in this area?

All gaps noticed showed Bevis trending higher or above than the district. Specifically, 3rd grade ELA (Bevis = 85%, Hillsborough 45%) Math (Bevis 96%, Hillsborough = 55%). Similarly, 5th grade science (Bevis 85% mastery, Hillsborough = 47%).

Reflecting on the EWS data from Part I, identify one or two potential areas of concern.

Administration, guidance, and teachers are monitoring bottom quartile students.

Rank your highest priorities (maximum of 5) for school improvement in the upcoming school year.

Continue blending science curriculum with ELA and working with small group instruction in multiple content areas.

Area of Focus

(Identified key Area of Focus that addresses the school's highest priority based on any/all relevant data sources)

#1. Positive Culture and Environment specifically relating to Other

Area of Focus Description and Rationale:

Include a rationale that explains how it was identified as a crucial need from the data reviewed. One Area of Focus must be positive culture and environment. If identified for ATSI or TSI, each identified low-performing subgroup must be addressed.

We noticed a decline in social skills post-Covid among peer interactions and student to teacher exchanges.

Measurable Outcome:

State the specific measurable outcome the school plans to achieve. This should be a data based, objective outcome.

Hillsborough District disseminated the Panorama survey to 4th and 5th grade students in an effort obtain a culture and climate read on the students. Only 65% of students who took the survey state that they were able to successfully regulate their emotions. With an inability to regulate one's emotions, it will negatively impact peer interactions. Through usage of the National School of Character Program, our goal is to improve the survey outcome by 5%.

Monitoring:

Describe how this Area of Focus will be monitored for the desired outcome.

Panorama survey data will be monitored seasonally.

Person responsible for monitoring outcome:

[no one identified]

Evidence-based Intervention:

Describe the evidence-based intervention being implemented for this Area of Focus (Schools identified for ATSI, TSI or CSI must include one or more evidence-based interventions.)

Monthly character lessons and promotion of positive social skills from the guidance department.
Mindful Mondays
Media Center Displays

Rationale for Evidence-based Intervention:

Explain the rationale for selecting this specific strategy.

Increasing positive social culture with provide students with a healthy academic culture in which to learn and grow.

Tier of Evidence-based Intervention

(Schools that use UniSIG funds for an evidence-based intervention must meet the top three levels of evidence as defined by ESSA section 8101(21)(A).)

Tier 1 - Strong Evidence

Will this evidence-based intervention be funded with UniSIG?

No

Action Steps to Implement

List the action steps that will be taken as part of this strategy to address the Area of Focus. Identify the person responsible for monitoring each step.

Guidance department will hold monthly classroom "guidance lessons."

Person Responsible: Rebecca Tiffany (rebecca.tiffany@hcps.net)

By When: May 2024

#2. Instructional Practice specifically relating to Science

Area of Focus Description and Rationale:

Include a rationale that explains how it was identified as a crucial need from the data reviewed. One Area of Focus must be positive culture and environment. If identified for ATSI or TSI, each identified low-performing subgroup must be addressed.

Student Achievement will increase, evident in learning gains on year end assessments, when teachers plan and provide differentiated instruction to meet the needs of every student.

Measurable Outcome:

State the specific measurable outcome the school plans to achieve. This should be a data based, objective outcome.

The percentage of students that prove mastery of standards will increase each year by 3%.
(SSA Science)

Monitoring:

Describe how this Area of Focus will be monitored for the desired outcome.

ELA and Science teachers will plan lessons that connect science content and reading standards. This will be implemented in both shared reading and small group instruction.

Person responsible for monitoring outcome:

Rebecca Thoms (rebecca.thoms@hcps.net)

Evidence-based Intervention:

Describe the evidence-based intervention being implemented for this Area of Focus (Schools identified for ATSI, TSI or CSI must include one or more evidence-based interventions.)

Small group, shared reading and independent reading of science rich informational text during ELA instruction.

Rationale for Evidence-based Intervention:

Explain the rationale for selecting this specific strategy.

Differentiated instruction is personalized and can be utilized within small group and ELP settings. Using vocabulary rich text for instruction provides students with context as they are introduced and use accurate terminology.

Tier of Evidence-based Intervention

(Schools that use UniSIG funds for an evidence-based intervention must meet the top three levels of evidence as defined by ESSA section 8101(21)(A).)

Tier 1 - Strong Evidence

Will this evidence-based intervention be funded with UniSIG?

No

Action Steps to Implement

List the action steps that will be taken as part of this strategy to address the Area of Focus. Identify the person responsible for monitoring each step.

Classroom walkthroughs will document progress as teachers continue to utilize small group instruction and differentiation.

Person Responsible: Rebecca Thoms (rebecca.thoms@hcps.net)

By When: May 2024

CSI, TSI and ATSI Resource Review

Describe the process to review school improvement funding allocations and ensure resources are allocated based on needs. This section must be completed if the school is identified as ATSI, TSI or CSI in addition to completing an Area(s) of Focus identifying interventions and activities within the SIP (ESSA 1111(d)(1)(B)(4) and (d)(2)(C).

N/A