

# How States Hold Districts Accountable— and What California Can Learn

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The California State Board of Education (CASBE) has called attention to the number and proportion of districts currently identified under the state's differentiated accountability system and whether the state and county offices of education have the capacity and resources to sufficiently support their improvement. To inform ongoing discussions about how to improve the system, CASBE is interested in understanding how other states approach district accountability—both in terms of their methods for identifying underperforming districts and their actions for driving improvement.

State approaches to district accountability vary widely across the nation, with key differences in how underperforming districts are identified, whether and why the state assigns district performance designations, and what types of supports and consequences the state provides to designated districts. This brief describes which states hold districts accountable, the mechanisms for identifying underperforming districts, and the range of districts impacted, based on a national policy scan. In subsequent briefs, we will describe specific actions that states require to catalyze improvement in underperforming districts.

Overall, contemporary research, evaluation, and monitoring evidence converge on the conclusion that districts remain indispensable actors in school improvement. While federal and state accountability policy has evolved, districts continue to be responsible for creating coherent instructional environments, allocating resources equitably, and sustaining improvement over time. Yet their capacity to do so varies widely, making targeted state support—and, in many cases, stronger district-level systems and practices—critical to ensuring lasting improvement in the nation's lowest-performing schools.

## What We Found

- Nearly all states produce district report cards, which are required by federal law, to share districtwide performance data.
- About half of states generate accountability ratings—or labels—that describe levels of district performance and identify districts that are underperforming.
- Of the states that label district performance, 20 provide some degree of support to underperforming districts to build capacity and drive improvement at the local level.
- Most frequently, states generate accountability ratings based on the aggregate performance within a district, but in a subset of states, district accountability ratings are driven by the number or percentage of schools identified for Comprehensive Support and Improvement (CSI).
- Among states that rate districts, most identify a relatively small share of districts, typically less than 10%. The exception is California, which has targeted more than half of districts for support.

**School districts play a central role in shaping the conditions necessary for school improvement.** Research shows that schools can improve faster and sustain gains when districts provide clear direction, aligned instructional systems, and practical support for principals and teachers (Corcoran et al., 2001; Leithwood et al., 2019). Studies of school turnaround find that success depends less on adopting a specific reform and more on how districts support implementation of improvement practices over time—through coherent instructional guidance, consistent data use, and hands-on engagement with schools (Hill et al., 2023). Recent findings show that districts build school capacity when they pair accountability with resources and supports that strengthen collaboration and problem solving, but they struggle to improve schools when these supports fail to address core issues like staffing and retention (Torres, 2024). Practitioner-focused research reinforces these findings, highlighting the district’s central role in hiring teachers, developing leaders, coordinating improvement efforts, and sustaining progress across schools (Blazar & Schueler, 2022; Honig & Rainey, 2023).

**That said, sometimes districts cannot provide sufficient support to schools on their own.** They may need outside help—whether from the state, regional agencies, or private organizations. Such support may be initiated by state accountability systems, although requirements for identifying and supporting districts with acute performance challenges have evolved over the past decades. Under No Child Left Behind, states were required to identify districts for improvement under Title I and Title III, making district accountability a core federal expectation. Since the passage of the Every Student Succeeds Act (ESSA), however, the federal government no longer requires states to issue district-level accountability ratings. Instead, ESSA requires states to identify schools—particularly those in the lowest-performing 5%—for CSI and to ensure that districts overseeing these schools receive support and oversight. However, the design and implementation of district supports is largely left to state discretion. Despite ESSA’s loosened requirements, many states have opted to maintain some form of district accountability to monitor whether districts are on track.

“Research really shows and our experience here in California is that many of the things that are needed for school-level improvement are driven by district-level decisions ... our different interventions through our system of support are given at the district level with those conversations of what’s going on [at] specific schools within the district [as] part of a larger conversation of what’s going on inside the district.”

California administrator (quoted in Boyle et al., 2024, p. 6)

## Typology of District Accountability

Staff from the West Comprehensive Center reviewed state education agency websites and policy documents to determine how states provide district-level accountability. The most basic accountability mechanism is to simply measure and publicly report data on district performance. However, states often layer additional mechanisms on top of data reporting, including district accountability designations (or ratings), additional support and resources, and, in some cases, consequences such as state takeover or termination of employment for some administrators.

To depict the national landscape of state approaches to district accountability, we have developed the following typology based on three general state approaches that emerged from this review:

- **Report card only:** States that measure and report on district performance, resources, and characteristics, including enrollment, academic achievement, absenteeism, teacher qualifications, and fiscal resources, among other measures. Because report cards provide transparency around district performance, they allow the public to assess whether the district is underperforming.
  - **Why report only?** While federal law requires the publication of district report cards, ratings that provide an overall assessment of districts' performance are optional. States may choose to rely on report cards to avoid oversimplification of district performance. A single letter grade or descriptive label can obscure both strengths and challenges and may become politically contentious. For instance, assigning labels to districts may have unintended consequences for communities, particularly those facing systemic challenges or serving historically marginalized students, by reinforcing stigma or disadvantage. Moreover, if state resources are limited, they may avoid creating ratings that they cannot act upon. In a nutshell, states may decide that the costs of going beyond a report card outweigh the benefits.
- **Report and rate:** States that measure and report data on district performance and also assign designations to district performance—for example, letter grades (A–F), colors (red, green), or descriptors of performance. However, no support or consequences are associated with these designations.
  - **Why report and rate?** Accountability designations communicate performance information efficiently and with strong signaling power. States may opt to “report and rate” if they want to generate a sense of urgency to respond to warning signs of low performance.
- **Report, rate, and respond:** States that measure and report on district performance, assign designations, and provide supports and/or interventions to help underperforming districts improve. There is a variant to this: *Report, but rate and respond only for some districts*. In these cases, states attribute a designation to a small subset of districts and provide intensive supports for these districts. Other districts do not receive a rating.
  - **Why report, rate, and respond?** This is the most comprehensive approach, in which states commit to providing resources, such as direct technical assistance, funds, and online tools, to support districts identified as underperforming, rather than relying on local capacity and motivation.

**All states<sup>1</sup> publicly report district-level performance but differ in how reporting is used.**

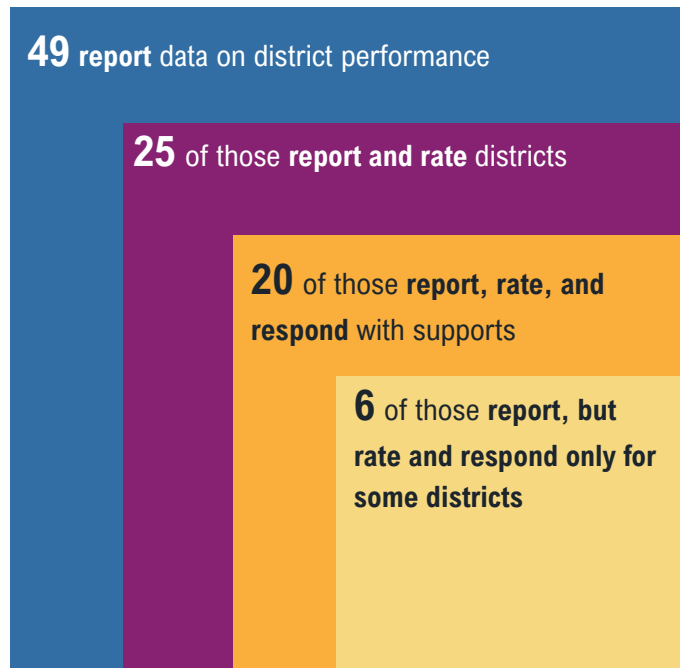
While 24 states rely on reporting for informational purposes only (without a summative assessment of district performance), 25 states formally classify districts by assigning a designation or status based on state-determined criteria (Exhibit 1). Among states that assign designations,

<sup>1</sup> Hawaii, the District of Columbia, and Puerto Rico are excluded from this analysis because they operate as a single unit and therefore do not have individual local education agencies subject to district-level accountability.

most (20 states) link identification to a state response. In a smaller set of these states (six states), this rate-and-respond approach is applied selectively, with designations and supports reserved for a subset of districts. Examples of how states implement each of these approaches are shown in Exhibit 2.

### Exhibit 1. Number of states by approach to district accountability

Half of states rate districts, with most of those pairing labels with support.



## Exhibit 2. Examples of State Approaches

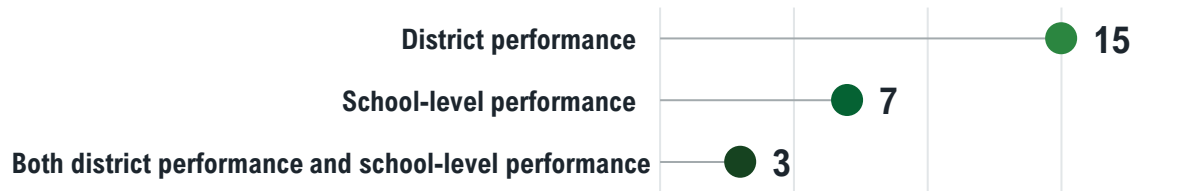
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|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Report Card Only: Idaho</b>                                                | <p>The Idaho Department of Education releases an annual district report card on the state website, including information on enrollment, academic achievement, growth, chronic absenteeism, college and career readiness, and graduation rate. Districts are monitored by the state but are not classified or labeled.</p>                                                                                                                                                                                                                                                                                                                                                           |
|   | <b>Report and Rate: Arizona</b>                                               | <p>The Arizona district report card includes information about enrollment, teacher qualifications, student achievement, growth, test participation, graduation rate, dropout rate, English learner proficiency progress, chronic absenteeism, and fiscal data. Arizona calculates “LEA grades,” included in a downloadable Excel file from the state education website but not reflected in district report cards. There is no statutory requirement for district-level interventions or sanctions based on those grades. In contrast to district grades, all Arizona schools receive a letter grade (A–F), which is readily available on the state board of education website.</p> |
|   | <b>Report, Rate, and Respond: New Jersey</b>                                  | <p>The New Jersey Quality Single Accountability Continuum is designed to assess district performance based on key indicators of district effectiveness. If a district scores below 80% in a component, it is marked as in “interim status” and must develop a district improvement plan. If, after an interim review in 6 months, a district has not improved, the state Division of Field Support and Services will provide technical assistance in the low-scoring component. If, over time, districts still do not improve, New Jersey law provides for escalation of state intervention, although the state has not taken over a district in more than a decade.</p>            |
|  | <b>Report, but Rate and Respond Only for Some Districts: Washington State</b> | <p>Washington’s Required Action District (RAD) policy is a targeted intervention for districts that oversee schools in the lowest decile. Established in state law, RAD requires designated districts to partner with the state to implement and monitor improvement plans, receive intensive supports, and demonstrate progress toward exit criteria. Since ESSA, RAD has been aligned with Washington’s School Improvement Framework and is used sparingly, focusing on a small number of districts where school-level improvement efforts have not been sufficient.</p>                                                                                                          |

## What Triggers Identification?

**Among the 25 states that rate districts, most base identifications on district-level performance, while some rely on school-level performance, and a few use a combination of both.** In 15 of the 25 states that assign districts a designation or rating, identification is triggered by district-level performance, typically by aggregating student outcomes and evaluating results as if the district were a single unit. A few states incorporate additional domains related to district capacity or operations in addition to student outcomes. For instance, New Jersey’s framework includes domains such as instruction and program, fiscal management, governance, operations, and personnel; and West Virginia includes multiple “efficiency” indicators, such as finance, personnel, transportation, and facilities, alongside indicators of student performance.

### Exhibit 3. Number of states by basis of district identification

District-level performance is the most common basis for identifying districts.



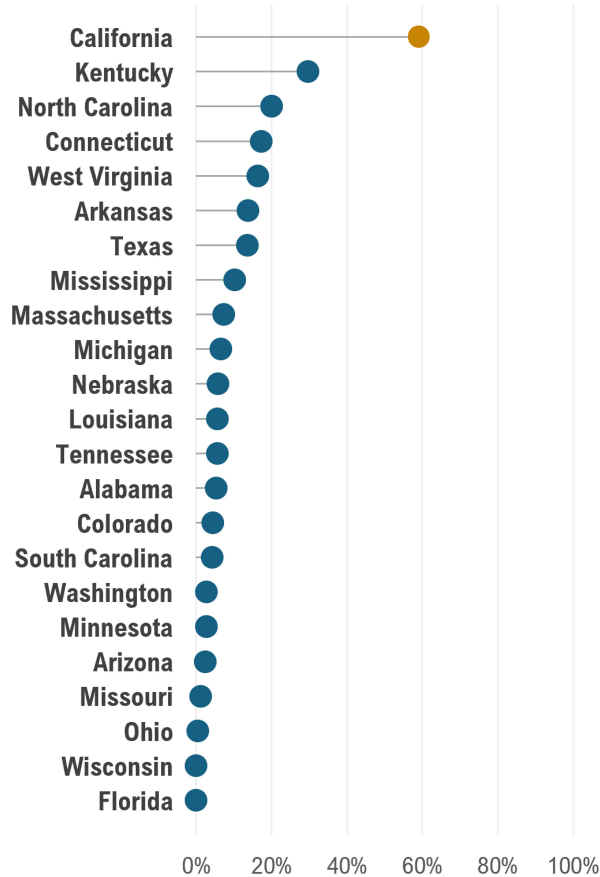
Seven states base district identification on school-level performance but differ in how school results are used to drive district-level determinations. For instance, three states—Michigan, Minnesota, and New York—link district identification directly to ESSA school identification categories, with districts identified based on the presence or concentration of CSI, Targeted Support and Improvement (TSI), or Additional Targeted Support and Improvement (ATSI) schools. Three other states—North Carolina, South Carolina, and Washington—base district identification on the number or proportion of schools identified as low-performing, using state-defined performance criteria rather than federal ESSA categories. Arizona employs a unique approach, basing district identification on aggregated school ratings derived by averaging schools' letter grades after converting them to a numeric scale.

The three remaining states use hybrid approaches that draw on both district- and school-level performance. In Arkansas, district identification is driven primarily by district-level performance on indicators such as achievement, growth, and readiness, with district ratings tied to school performance, so that a district's rating cannot be higher than its highest-performing school or lower than its lowest-performing school. Kentucky bases district identification on a combination of district status and improvement over time, while districts may also be identified based on the presence of multiple CSI or TSI schools. Texas calculates district domain scores using the proportional weighting of campus-level results, directly embedding school performance into district ratings.

**California identifies districts at a scale that is atypical relative to other states that rate districts.** In 2025, California identified 585 districts, representing 59% of districts statewide. By comparison, no other state identified more than 30% of districts, and most identified far fewer (Exhibit 4). Even states with relatively high identification rates—such as Kentucky (30%), North Carolina (20%), Connecticut (17%), and West Virginia (16%)—identify a substantially smaller share of districts than California. This contrast underscores that California's differentiated assistance system operates at a scale that is atypical relative to other states that both rate districts and use those ratings to trigger external supports.

#### Exhibit 4. Percentage of districts identified as low-performing

Most states identify a small share of districts. California is the only state to exceed 30%.



*Note.* Values reflect the most recent year of district-level data available for each state, which is 2025 for most states. Data for Colorado and South Carolina are from 2024, and data for Connecticut are from 2023, based on the most recent publicly available district lists at the time of analysis. Of the 25 states that rate districts, district-level identification counts were available for 23 states; data were not available for New Jersey and New York. Low-performing districts were identified using each state's accountability framework. In states that report, rate, and respond, counts reflect districts designated by the state for support, intervention, or differentiated assistance (or equivalent categories). In report-and-rate states, which do not assign formal district identification statuses, districts were classified as low-performing if they received the lowest accountability ratings (e.g., D or F letter grades), consistent with how performance information is reported publicly in those states.

**Among states that rate districts, most identify a relatively small share of districts,** typically less than 10%. Based on the most recent data available for each state, 18 states identified no more than 15% of their districts, with 10 states identifying 5% or fewer. Two states—Florida and Wisconsin—identified no districts in the most recent year of data available. This clustering at the low end suggests that in many states, district identification is designed to be relatively targeted—even where states rate districts and have authority to act. Across states that rate districts, the basis for identification does not, on its own, explain how many districts are identified; states using district-level, school-level, and hybrid approaches all range from identifying very few districts to identifying a more substantial share.

## What Are Implications for California, Based on This Policy Scan?

**There are strong reasons for states to implement district accountability.** Even sophisticated school-based accountability systems can miss root causes that are districtwide. For example, districts often control hiring of administrators and educators, budgeting and resource allocation, selection of curricula and academic interventions, and student assignment to schools. A district accountability system creates an imperative for districts to improve these conditions, rather than placing all responsibility on individual schools that operate within district constraints.

District accountability allows states to identify districts with widespread underperformance, distinguish between a few struggling schools and a struggling system, and appropriately tailor interventions (e.g., leadership support, fiscal oversight, governance changes). School accountability alone can misattribute responsibility and obscure systemic patterns. Without district accountability, states may repeatedly intervene in individual schools without addressing the underlying system.

To generate benefits from district accountability, California—and other states—needs to consider a series of questions and balance associated policy tensions:

- **Should California simply report on district performance, or are there added benefits to assigning an accountability rating to districts? Are the potential benefits justified by the needed resources?** States that only report data on district performance—rather than rating or responding—are relying on information conveyed by the data as the primary catalyst of system change. This may reduce political risk but also mutes a sense of urgency at the local level. On the other hand, states that rate and respond to underperforming districts must commit to allocating resources in a time of constrained education budgets.
- **What indicators and measures should California include in its district report card? Which of these should drive accountability designations?** District report cards should include sufficient data points to convey a comprehensive picture of district performance. They offer an opportunity to provide detailed and nuanced data, but with the risk of information overload at the local level. To balance this, states can base accountability ratings on—and focus attention on—a subset of meaningful indicators. Moreover, what states measure and publicly communicate reflects their policy priorities. States can then prioritize districts with the most persistent challenges and target supports and interventions that match their capacity to deliver them.
- **Should districtwide or school-level data trigger district accountability ratings?** Districtwide data can illuminate patterns that might be overlooked or dismissed as idiosyncratic at the school level. For example, some student groups are too small in number to have their outcomes disaggregated for school-level accountability purposes; therefore, the status of their educational success only becomes apparent when their outcomes are aggregated across a district. Thus, district accountability may reveal otherwise hidden concerns related to the achievement of groups of students, as well as their access to needed

resources. For these reasons, it seems likely that California will seek to retain districtwide data in the context of district accountability.

- **Should California focus on a small number of the very lowest-performing districts in the state to target limited state resources on districts with the greatest need?** If accountability systems identify a large number of districts, it is difficult to provide all of them with supports of sufficient intensity and responsiveness to build local capacity. At the same time, a tiered approach allows the state to offer lighter-touch, preventative support to districts nearing intervention thresholds—helping avoid unnecessary labeling while providing early guidance that may be sufficient to spur improvement. California may wish to consider refining its tiering structure—either by further differentiating support levels or by adjusting criteria—to ensure that state resources remain concentrated where they can have the greatest impact. Some states have adopted “watch” or “warning” designations to signal emerging risk without triggering full intervention requirements. These designations offer a way to communicate urgency and promote improvement while preserving flexibility in how and when formal support is deployed.

More broadly, accountability systems are most effective when they reflect a clear understanding of where the state is uniquely positioned to add value. Expecting districts to address persistent, systemic challenges on their own can place them at a disadvantage, particularly when those challenges are widespread. By identifying common issues across districts and developing aligned, statewide supports, California can strengthen district capacity and create the conditions for more consistent, improved outcomes for students.

### What to Expect in Future Briefs

Future briefs will examine:

- The features of high-quality state supports that build district and school capacity
- The specific actions states take in underperforming districts to catalyze and sustain improvement

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