



Post-EQA* Accountability: A Menu of Policy Options

Introduction

Accountability, one of the main components of standards-based reform, is intended to focus attention and pressure on public schools to spur the improvement of educational outcomes for all students. The rationale behind standards-based reform is that state and federal policymakers provide more flexibility for educators and support to schools and districts in exchange for more accountability for student results. The underlying principle is that moving away from a focus on inputs toward a focus on outcomes will lead to improved results for students.

Accountability means that schools and districts are rewarded for improving student achievement and first assisted, then sanctioned, if they fail to bring all students to proficiency. Through the establishment of accountability systems, policymakers seek to hold schools and districts responsible to the public, requiring evidence that schools are effectively spending public funding and compelling educators to prove that they are making adequate academic progress with their students.

Many states, Massachusetts among them, established statewide standards-based reform initiatives in the mid- and late-1990's and created accountability requirements focused on districts, schools and students, all designed to make the performance of every student matter. Consistent with the accountability provisions envisioned in the Massachusetts Education Reform Act (MERA) of 1993, the Office of

Educational Quality and Accountability (EQA) was created by the Legislature in 2000 to provide an "independent mechanism to verify the efforts of school districts and charter schools in order to promote higher levels of academic achievement by students."¹

Independent of the Department of Education, EQA was designed to assure an objective, data-based evaluation of districts focused on fiscal and programmatic effectiveness. While education policy at the federal level focuses on schools as the unit of improvement, EQA focused on school districts. EQA was charged not only with evaluating how state and local funding was spent in districts, but equally important, gauging the quality of the results from these expenditures. Based on more than test scores alone, EQA reports provided a quantitative and qualitative examination of districts, based on indicators of quality and data-rich district level analysis. EQA reviews were designed to present a comprehensive analysis of district performance in terms of leadership; curriculum and instruction; assessment and evaluation systems; student academic support systems; human resource management and professional development; and financial systems and efficient asset management. EQA represented an accountability system not based solely on student performance, but a more comprehensive perspective of the school district based on data and evidence.

While EQA has been cited as a national model, it also received mixed feedback from the districts it

* Massachusetts Office of Educational Quality and Accountability

¹ More complete information about the Massachusetts Office for Educational Quality and Accountability can be found at: <http://eqa.mass.edu/home/index.asp>.

reviewed and faced criticism related to the ways in which its mandates were implemented. Partially in response to these criticisms, the finalized budget for Fiscal Year 2008, approved by the Legislature and signed into law by the Governor, provided nearly \$3 million to EQA “for the purpose of completing ongoing audits and those scheduled with school districts as of May 1, 2007”² and provided that “funds remaining in this item subsequent to the completion of ongoing and scheduled audits shall be made available to any successor entity to the office of educational quality and accountability for the purpose of promoting school district accountability.”³ A work plan is now being developed to establish a new accountability function to replace EQA in FY09. Intended to contribute to the discussion about a new accountability function, this policy brief will explore models of accountability systems from other states and countries and will identify options for consideration by policymakers.

Purpose and Methods

This policy brief is intended to inform current policy discussions focused on the creation of a new accountability function. It is comprised of four sections:

1. A summary of the current Office of Educational Quality and Accountability;
2. Case examples and key lessons from four states’ and three countries’ efforts to establish state-level, comprehensive evaluation systems;
3. Guiding questions for identifying a new district accountability function; and
4. Options for Massachusetts policymakers to consider.

Research for this brief included a national scan of statewide accountability systems conducted through web research, document analysis and interviews with

Accountability vs. Assessment Systems

Assessments such as statewide standardized tests are often considered to be synonymous with accountability systems. While student assessments are part of most accountability systems, they are only one component in a comprehensive system.

Accountability refers to the act of holding educators and students responsible for their results.

Assessments are often used as an accountability tool. Standards-based education reforms at the state (MERA) and federal (NCLB) levels rely on students’ scores on standards-based assessments to hold schools accountable.

state leaders in several states. The states included in this brief were selected based on the extent to which they had established state accountability systems focused on financial and programmatic reviews at the school or district level.

The Office of Educational Quality and Accountability

The Massachusetts Legislature created the Office of Educational Quality and Accountability (EQA) in July 2000. The EQA was established “within the Department of Education (DOE), but not subject to its control.”⁴ Solely a fact-finding entity, the EQA did not offer recommendations for remediation or provide technical assistance. Instead, the EQA provided school districts with data upon which they could base decisions and take action toward improvement. Separate from and unrelated to the EQA’s reviews, the DOE’s Office of Accountability and Targeted Assistance (ATA) uses student performance data to determine Adequate Yearly

2 Chapter 61 of the Acts of 2007, Line Item 7061-0029. <http://www.mass.gov/legis.laws/seslaw07/s1070061.htm>.

3 Chapter 61 of the Acts of 2007. <http://www.mass.gov/legis.laws/seslaw07/s1070061.htm>.

4 Massachusetts General Laws, Chapter 15, Section 55A.

Progress (AYP)⁵ and to classify schools as “in need of improvement.” ATA is then responsible for providing assistance to those schools and districts that have received this designation.

According to its mandate, the EQA provided an “independent mechanism to verify the efforts of schools and school districts to promote a higher level of academic achievement by students.”⁶ The EQA developed a multi-step, data-driven approach to carry out this mandate. Since 2002, more than 135 school districts have been reviewed in addition to 32 charter school renewal inspections and 26 reviews of underperforming schools. The Office was solely supported by an appropriation in the Massachusetts state budget⁷ and received an annual appropriation of \$3.4 million for FY07.

While many states have altered their accountability systems to adhere strictly to the requirements of NCLB, which target schools, Massachusetts remains one of a few states to have established a separate district level accountability function over and above NCLB accountability mandates. In essence, Massachusetts had two accountability systems: one district-focused accountability system enforced by EQA and one school-focused accountability system enforced by the Department of Education’s Accountability and Targeted Assistance Office (ATA) to comply with NCLB.

School-level Accountability

In order to have a comprehensive view of accountability in Massachusetts, it is important to understand the process for school level reviews overseen by the Accountability and Targeted Assistance Office. ATA utilized district reports from EQA, but it has its own criteria, based on NCLB mandates, by which it identifies schools and districts as in need of improvement. These criteria are completely independent of the

EQA review. ATA bases its determinations on schools’ student test scores on the Massachusetts Comprehensive Assessment System (MCAS) and Adequate Yearly Progress (AYP) as compared with state AYP targets. Schools that do not meet AYP in English language arts and/or mathematics for students in the aggregate for four or more consecutive years are deemed “in corrective action” or “restructuring” by the DOE and are identified as Commonwealth Priority Schools. Districts that oversee schools deemed Commonwealth Priority Schools are then required to work with the identified school(s) to conduct Fact Finding Reviews based on examination of leadership capacity and essential conditions for improvement at the school. The district must develop a plan for intervention at the school. District and school leaders submit their plan to a State Review Panel, comprised of three highly skilled individuals with whom the DOE contracts. If the district-led Fact Finding Reviews are not satisfactory, the State Review Panel can send its own Fact Finding team to the school and district for a more comprehensive diagnosis. Once a district’s improvement plan has been accepted by the State Review Panel, the State Board of Education must formally approve it. The district and school have two years to implement the plan’s improvement initiatives, after which the DOE will conduct a follow-up review.

EQA Governance and Leadership

The Education Management Audit Council (EMAC), established in 1999 by executive order, was a five-member, governor-appointed council that oversaw the work of the EQA. EMAC was responsible for selecting districts for review, approving standards and indicators used in the review process, and reviewing district reports. The EMAC’s findings for individual districts were reported to the Governor,

5 Adequate Yearly Progress is a provision of the No Child Left Behind Act that combines student progress, student participation, student progress over time and requires that results are disaggregated by race/ethnicity, economic status, students with disabilities and English language learners. NCLB has targeted bringing all students to proficiency (as defined by their performance on state tests) by 2014.

6 Massachusetts General Laws, Chapter 15, Section 55A.

7 The Acts of 2006, Line Item 7061-0029.

Legislature, and to the general public. EMAC members held four-year terms and met bi-monthly. The EQA office was led by an Executive Director, and had a small staff consisting of examiners, coordinators and a Director of District Services.

EQA Reviews

EQA's review process for school districts was a multi-phase process involving data analysis, document review and on-site observations and interviews. The first phase of the review process, formerly known as Tier 1, subjected districts to a thorough annual review of student performance data, acquired from the Massachusetts Comprehensive Assessment System (MCAS) database. Analyses were conducted by EQA staff to determine both performance and growth for the overall student population within the district and for each individual subgroup, in accordance with No Child Left Behind. These subgroups included special education students, students receiving free or reduced lunch, students of racial and ethnic minority subgroups and English language learners (ELLs). There were five "essential questions" addressed in the first phase of a review:

1. Are the district's students reaching proficiency levels on the MCAS?
2. Do MCAS test results vary among subgroups of students (such as minority and low income students and students with disabilities)?
3. Has the district's MCAS test performance improved over time?
4. Has the MCAS test performance of the district's student subgroups improved over time?
5. Are all eligible students participating in required local and state assessments?

The second phase of the review process included classroom visits, interviews with district administrators, school committee members, local officials, teachers and the local teacher association president as well as a review of approximately 30 documents representing four years of data. District reviews

included analyses of both quantitative and qualitative evidence from the district's data and documents. On average, 46 districts were selected for review each year. An on-site visit was considered to be "the most important part of the whole process."⁸

The EQA's review analyzed district performance in six areas:

- Leadership, governance and communication;
- Curriculum and instruction;
- Assessment and program evaluation;
- Human resource management and professional development;
- Access, participation, and student academic support; and
- Financial and asset management.

In addition, the EQA process of examining school districts considered 64 indicators within the six standards listed above. The districts were provided with a rating of 'Excellent,' 'Satisfactory,' 'Needs Improvement,' or 'Unsatisfactory' for every standard and indicator. The 64 indicators informed the Management Quality Index (MQI): a high MQI (maximum was 100 percent) indicated that the district had exhibited strong performance on all indicators. The EQA's past Annual Reports include a comparison of MQIs in reviewed districts as well as a listing of themes common to districts reviewed. A team of approximately five to seven examiners conducted the site visit over four days. Examiners were primarily former educators and school administrators from Massachusetts.

At the conclusion of each examination, findings from the data, document and on-site reviews were compiled into reports prepared by EQA staff and reviewed by the EMAC. Prior to 2006, the reports produced were 'technical reports' that often surpassed 100 pages in length. In 2005, the EQA began producing 'general reports,' which were less than 30 pages in length, and provided a condensed, focused set of observations and findings. The purpose of these reports was to present the district's administra-

8 EQA website. <http://eqa.mass.edu/home/index.asp>.

tors and policymakers, both at the local and state levels, with a concrete evaluation highlighting the district's strengths and weaknesses. These reports were then reviewed by EMAC and accepted, with either commendation or concern. If EMAC had concerns regarding the district's performance, the district was placed on "watch." Districts with "watch" status were assigned a trained senior examiner to monitor their performance. A follow-up re-examination was then conducted to determine progress and improvement. Following the re-examination, the district was removed from "watch" or the EQA/EMAC recommended to the state Board of Education (BOE) that the district be named "underperforming."

Recent Developments

Over the past few years, there have been efforts to change the district accountability system in Massachusetts or influence the execution of the current accountability system, including significant changes to the structure of EQA and EMAC. During

the 2005-2006 Legislative session, a bill was filed to move the Office of Educational Quality and Accountability and subject it to the oversight and control of the Massachusetts Department of Education. As previously mentioned, the FY08 state budget included language allowing the EQA to complete any ongoing audits and those that had been scheduled as of May 1, 2007. The budget then stipulated that the remainder of the funds allocated in this account were to be provided to a successor entity. Current state level policy conversations are focusing on how the Commonwealth can best restructure its district level accountability system and positively impact the execution of these functions.

Challenges of the Current System

- **Streamlining of Various Review Processes.** There are several audit and review processes utilized in Massachusetts public schools and school districts (see text box below). All of these review processes—EQA, Fact Finding, CPR, and NEASC accredi-

Forms of Accountability in Massachusetts

EQA Review—a district level review conducted by a team of evaluators and focused on leadership; curriculum and instruction; assessment and evaluation systems; student academic support systems; human resource management and professional development; and financial systems and efficient asset management.

Diagnostic Fact Finding Review—under new regulations, this review is a self-assessment conducted by district and school teams in underperforming schools with DOE guidance. It is designed to encourage districts and schools to use data to identify challenges in teaching and learning in English language arts (ELA) and mathematics, and enable the essential conditions that make instructional improvement possible. Prior to the amendment of regulations related to assisting the State's lowest performing schools in October 2006, a process called the School Panel Review assisted the Commissioner of Education in determining whether state intervention was needed to guide improvement efforts in schools. Following this process, the Department conducted a Fact Finding review designed to inform the development of the school's plan for improving student performance.

Coordinated Program Review (CPR)—a program within the Massachusetts Department of Education's Program Quality Assurance Services (PQA) that oversees local compliance with federal education requirements in several areas including special education, English language learners, Title I funding, career and technical education, safe and drug-free schools and civil rights. Districts are eligible for review every six years. PQA provides technical assistance and guidance to local public and private school personnel, parents and persons from the general public regarding several state and federal education laws, regulations and Board of Education policies.

NEASC Accreditation—for over 100 years, the New England Association of Schools and Colleges (NEASC) has conducted voluntary, peer-led accreditation reviews of primary and secondary schools throughout the six New England states. Schools are evaluated based on seven standards and the process includes a 12-month self-study by the school and community, on-site evaluation by a peer review team and required follow-up activities.

tation—require districts under review to collect data and documents and to host on-site visits. The repetitive requirements for each review and the lack of coordinated data collection by the various entities posed a challenge to school districts, which could potentially undergo multiple reviews in a short period of time.

■ **Linking District Reviews to Technical Assistance.**

The general and technical reports released by the EQA upon the completion of a district review presented facts regarding the district’s performance on the standards and indicators listed above. This system, however, reflected a separation of the audit process from technical assistance. Thus, the reports did not include explicit recommendations regarding the specific actions districts should consider implementing to improve their performance, nor did the reports offer recommendations regarding the provision of technical assistance from the state. The EQA’s reports provided a thorough and detailed evaluation of district performance, based on data. However, the reports did not identify what steps should be taken to improve or how a district might access support, expertise and assistance from the state.

■ **Identifying Districts to Review.** Each year, 60 percent of districts selected for review had been designated as low performing and 40 percent were selected at random. According to many district leaders, requiring high performing districts to undergo an EQA review was unnecessary and potentially an inefficient way to use the state’s limited resources—which might have been better spent on reviews of low performing districts. One of the challenges the new accountability function faces is how to prioritize districts for review.

■ **Defining the Role of the EMAC Board.** As an independent body, the EMAC was not held accountable to the state Board of Education or any other entity. Along with this lack of accountability came a lack of authority, which meant that EMAC could only make recommendations to the Board regarding the status of a school district. It was the

Board of Education members, not EMAC members, who had the authority to make the final decision about whether or not a district would be named underperforming.

Case Examples

A limited number of states in the nation have established accountability systems that go beyond the mandates of No Child Left Behind to include a comprehensive evaluation of several criteria, including: leadership; governance; curriculum and instruction; assessment; facilities; human resource management and professional development; and financial and asset management. Even fewer states have accountability systems that include an on-site review process at the school or district level. While many states have enabled their state auditor’s office to conduct financial audits of school districts, these are done on a limited or as-needed basis and often ignore programmatic issues. Under pressure from the accountability provisions and fiscal demands resulting from the No Child Left Behind Act, many states have strictly aligned their accountability systems to these mandates and abandoned any accountability structures not completely in sync with NCLB. Further, given the fiscal and human capacity deficits that exist in most state education agencies,⁹ it is unlikely that in the future states will have the resources necessary to create comprehensive accountability systems like EQA, regardless of the benefits in doing so.

The case examples described in this section represent accountability systems that, like EQA, include a comprehensive analysis of some or all of the following factors: student achievement, leadership, curriculum and instruction, fiscal efficacy, and governance, combined with some provision of on-site audits or reviews. It is important to note that many of the systems described here are recently established or are in the early stages of their development. Thus, in many

9 For more information on state capacity challenges, see the Rennie Center’s policy brief *Examining State Intervention Capacity: How Can the State Better Support Low Performing Schools & Districts?* http://www.renniecenter.org/research_docs/0411_StateIntervention.pdf.

cases, it is too soon to tell the level of impact these accountability systems will have on schools, districts and student achievement. The case examples in this report are intended to provide ideas for policymakers to consider, not necessarily to serve as models of effective outcomes.

New Jersey's Quality Single Accountability Continuum (NJQSAC)

Summary

The New Jersey Quality Single Accountability Continuum was established in 2006 as the single, comprehensive monitoring and evaluation system of the Department of Education. The four main reasons for creating NJQSAC include: 1) to promote better collaboration between the Department of Education and local school districts; 2) to provide more targeted assistance to school districts; 3) to improve the identification of problems through enhanced monitoring; 4) and to establish a single accountability system that minimized districts' duplication of effort in complying with multiple laws. NJQSAC's primary purpose is to measure and improve school district performance in meeting state standards. Equal importance is placed on "measuring" and "improving." According to Deputy Commissioner Willa Spicer, "We need to get the data from districts, but we also need to do something with it." Launched with 15 of its most troubled districts in 2006-2007, NJQSAC is being developed as the system for evaluating all 618 school districts in the state every three years. The central component of NJQSAC is a self-assessment called the District Performance Review (DPR) that is focused on five areas: instruction and program; personnel; fiscal management; operations; and governance.

The first step in NJQSAC is the District Performance Review, which each district must complete every three years. To complete the review each district leader appoints a committee and completes the DPR, which is reviewed by county superintendents and the Commissioner. The districts are given a

score, and if they fall below 80 percent, certain improvement activities follow (i.e. district improvement plan, possible external evaluation, possible technical assistance.) While intervention could be initiated if a district fails to comply with the monitoring portion of QSAC, it can also occur later, if a district is not complying with its plan, or there is other evidence that the district does not have the capacity to ensure provision of a thorough and efficient education.

NJQSAC also identifies Intervention Triggers, which include: failure to submit the initial self-assessment or any related documentation, failure to develop a District Improvement Plan; failure to implement the Improvement Plan, despite assistance from the Department of Education; and/or other circumstances that indicate insufficient local capacity to ensure provision of thorough and efficient education. The presence of one or more of these Intervention Triggers can prompt the Commissioner to initiate an intervention process with the district.

In-depth external team reviews are the second step in the NJQSAC process. These reviews consist of a team of experienced educators who are sent into the district to gather data in the five areas indicated in the DPR, compile a report and share findings. Legislation required the initial evaluation of the districts be done by a team of highly skilled professionals so the Department of Education contracted with Montclair State University to lead the initial reviews in school year 2006-2007. The reports generated are then used by the district to develop a District Improvement Plan.

The Commissioner can also send in a Highly Skilled Professional (HSP), if the process of developing a District Improvement Plan fails. Highly Skilled Professionals may be experienced educators, but they may also be other skilled professionals, such as representatives from an accounting firm, if there are significant financial problems in a district. The cost for this Highly Skilled Professional is shared by the district and the New Jersey Department of Education with each contributing 50 percent. HSPs can provide technical assistance under a district improvement plan, or, if a district requires partial or full state inter-

vention, HSPs can oversee one or more areas of district functioning. In the case of state intervention, the HSP has the power to overturn decisions made by the local board of education. In addition, if there is partial or full intervention in a district, the Commissioner can add three members to the district's board of education—the Commissioner may not terminate or replace board members, but may increase the board by as many as three seats.

Governance and Leadership

One of the benefits of the NJQSAC model is that it is a process that cuts across several offices within the New Jersey Department of Education. Currently, several DOE offices are also involved in coordinating and scaling up NJQSAC. Ultimately, the state Board of Education oversees NJQSAC as part of the work of NJDOE.

Technical Assistance

Connecting the diagnosis of challenges with the technical assistance to overcome them is one of the main goals of NJQSAC. According to Deputy Commissioner Spicer, “we have got to move beyond diagnosis. We have got to stop spending all of our money and resources on diagnosis without ever getting to the technical assistance piece.” The District Performance Reviews, along with in-depth external team reviews, are currently used as the diagnostic tools that shape the amount and type of intervention provided by the New Jersey DOE. Placing Highly Skilled Professionals in districts that are identified as in need of assistance is one critical component of NJQSAC's technical assistance. In addition, NJDOE is currently training a cadre of facilitators that will be dispatched to districts that score poorly on the continuum to assist with the development and implementation of District Improvement Plans. In the future, the NJQSAC will also incorporate the resources of the Office of Compliance and Investigation to provide a deeper evaluation of NJQSAC findings and to conduct follow-up activities related to audits and other pertinent indicators.

Key Lessons

- **Simplification of Accountability Requirements.** With the competing accountability requirements placed on districts, NJQSAC presents a streamlined process for monitoring school district progress and quality through the use of one set of comprehensive standards that apply to all districts.
- **Linking Assistance and Support.** NJQSAC is the sole system used to diagnose districts for support and assistance. Technical assistance is provided based on the findings of the external team review reports.
- **Universal Review, but Assistance Based on Needs.** While all districts in New Jersey must submit a District Performance Review every three years, the majority of districts do not require any intervention from the state. This allows the state to better target its limited resources to the neediest districts by conducting in-depth external team reviews and dispatching Highly Skilled Professionals only in those districts with the greatest need for assistance.

Ohio Department of Education Office of Policy and Accountability

Summary

Ohio has developed a “Tri-Tier Model of School Improvement Support” that guides the Ohio Department of Education (ODE) and its partners in providing resources, information and technical assistance to school districts, and is particularly focused on the lowest performing districts. This model, which was developed in response to No Child Left Behind (NCLB) mandates and AYP sanctions, helps the ODE prioritize districts and determine the level of attention and support that should be provided to each individual district.

About ten percent of Ohio's school districts fall into Tier 1, which are considered to be most in need of the state's expertise and assistance and receive the most intensive services. Tier 2 districts receive “targeted services,” including access to “data-determined

products and programs” and periodic assistance to enable districts to plan and implement school improvement processes. Tier 3 districts are not required to partake in ODE services, but are granted “universal access” to products and programs that are designed to enable leaders to build capacity. The tier designation is useful in helping the ODE determine the level of staffing and resources that they provide to each district throughout both the review and assistance phases of the process.

To accomplish its diagnostic function, ODE is developing and refining several instruments that are currently being piloted in select districts. The diagnostic function starts with data analysis but goes further, through the use of document reviews; interviews with leaders, teachers, and students; and classroom observations.

Districts in Tiers 2 and 3 are granted access to diagnostic tools and templates (for example, interview questions for district leaders) and some assistance in conducting their own diagnostic reviews. However, these districts are responsible for identifying, recruiting and funding individuals to carry out their own district’s diagnostic review and intervention.

Districts identified as Tier 1 are reviewed by an ODE-trained team. This team compiles their findings into a detailed report for each district that serves as a comprehensive diagnostic analysis. An intervention team is deployed following the diagnostic review.

Governance and Leadership

The Ohio Department of Education (ODE) provides two major functions for Tier 1 districts: a diagnostic function and an intervention function. Early on, the ODE realized that they did not have sufficient staffing to carry out these two processes on their own. Therefore, they identified outside agencies to assist in performing both the diagnostic and intervention functions.

The decision to separate the diagnostic and intervention functions into two different teams within the same office at ODE was a deliberate one that occurred after considerable in-house debate. The

2007-2008 school year marks the first year that different groups within the Department have been responsible for carrying out the two functions. In the past, the same group of ODE employees focused on both diagnostics and intervention, thus the same people conducting the diagnostic review could also be the ones providing the assistance. ODE observed that some of their reviewers’ diagnoses were equated with the resources available for the intervention instead of highlighting the districts’ most pressing needs, regardless of available resources and expertise. Under the current separated system, the reviewers’ self-interest is no longer an issue, since someone else is charged with providing support and assistance. Another internal DOE discussion centered on the idea of moving one of these functions (diagnostic or intervention) outside of the ODE, but there was not sufficient support to do so.

Technical Assistance

Once schools and districts have received a diagnostic review, they are linked with technical assistance and support from ODE and external partners through the intervention phase of Ohio’s school and district improvement model. ODE staff also chose to work both at the district and school levels, because they recognized that they would not be fully successful unless they worked with and had cooperation from districts.

The ODE, like many state departments of education nationwide, recognizes that it lacks sufficient capacity to provide direct intervention specialists. To address the issue of capacity, ODE has entered into agreements with 16 regional teams to provide intensive intervention based on the diagnostic review. The teams consist of literacy and math specialists, experts in school finance, individuals with leadership expertise, curriculum experts, and others. Each team works with ODE to design an intervention plan that must be aligned with the diagnoses for improvement. Ohio has had regular support teams in place for approximately five to six years, refining their approach in supporting low performing districts each year.

Fiscal Accountability

In addition to its compliance and audit functions, which include the monitoring of restricted funding from competitive and federal grants, the ODE also monitors fiscal accountability in districts and has developed a rating system that determines the level of monitoring and control the state exerts over individual districts. Districts categorized as “fiscal caution” or “watch” are required to submit plans and are monitored by the Department whereas districts categorized as “fiscal emergency” must turn their financial control over to a Fiscal Commission. The Fiscal Commission is charged with reducing the district’s budget deficit and is comprised of representatives from state and local government including appointees from the Department of Education, Office of Budget and Management and Office of the Mayor.

The Ohio Department of Education is also taking new steps to tie academic performance to financial accountability and control. If a district fails to make AYP, the Department can recommend how the district should spend the funds and these recommendations are delivered through one-on-one technical assistance. However, if the district fails to make AYP for four years, and the district is considered to be in Academic Emergency, an Academic Distress Commission is put into place. The Academic Distress Commission is charged with advising the district on how to run the programs and structure their budget. There has yet to be a need to create the Academic Distress Commission.

Key Lessons

- **Prioritization of “districts of concern.”** Recognizing that there are limited resources, the Ohio Department of Education focuses its resources on districts classified as Tier 1, the roughly ten percent of districts considered to be most in need of support and assistance from the state.
- **Availability of templates and tools so that all districts may self-assess.** While the state conducts a diagnostic review of Tier 1 districts and provides related intervention support, Tier 2 and

Tier 3 districts are granted access to diagnostic tools and templates and provided some assistance in carrying out their own reviews. This level of transparency and access allows for an accountability system that is universal and more useful for school districts.

- **Use of external partners to aid in intervention phase.** Like many state departments of education, the Ohio Department of Education lacks the capacity to carry out all the accountability functions with which they are charged. Their decision to work with external partners exemplifies an “all-hands-on-deck” approach to improving districts that is not limited by the state’s paucity of resources.

West Virginia Office of Education Performance Audits (OEPA)

Summary

In 1998, in response to a state adequacy lawsuit, the West Virginia State Legislature elevated its Office for School Audits from an office within the Department of Education to an independent state office charged with performing school reviews. In 1999, the Legislature passed *A Process for Improving Education: Performance Based Accreditation System*, which established the process for conducting Education Performance Audits statewide. In 2000, under a court-ordered agreement, this new office, titled the Office of Education Performance Audits (OEPA), was charged with evaluating and reporting on individual schools’ specific outcomes, including resource needs in personnel, curriculum, and facilities.

Independent of the Department of Education, OEPA reports directly to the West Virginia Board of Education. Through OEPA, the West Virginia Board of Education seeks to ensure that all students are provided equal educational opportunities and that schools and county school systems are held accountable for their results. By keeping OEPA separate from the Department of Education, the West Virginia Legislature aimed to ensure that audits would be con-

ducted as objectively as possible.

OEPA is responsible for conducting school and district audits and has recently been made responsible for auditing West Virginia's eight Regional Education Services Agencies (RESAs). School and district audits focus on the following six areas:

- Assessment of performance (based on test results and other indicators) and systems in place to enable performance;
- Review of school and system Unified Improvement Plans;
- Periodic on-site reviews of performance, progress and compliance with standards;
- Determination of school accreditation and school system approval status;
- Efficient use of financial and other resources; and
- Targeting of additional resources.

At the completion of each audit, the audit team compiles a report that is submitted to the Board of Education. Audit reports include not only findings based on data and evidence, but recommendations for improvement related to any of the six focus areas highlighted above. Each audit team consists of experienced and credible former and current educators.

In 2004, the Legislature mandated that the Office of Education Performance Audits would review only persistently low performing schools and districts unless the state Board of Education called for a review of an additional school or school district. Audits can be used as indicators of the need for intervention before schools and districts are in need of improvement. Assistance then includes access to: technical assistance, professional staff development, and additional monetary, staffing and/or other resources.

Targeted technical assistance is linked to OEPA audits through a connection with the Office of School and School System Improvement. This office reads OEPA audit reports as a first step when schools are identified as in need of assistance. Instead of waiting for schools to contact the Office of School Improvement, staff from this office place calls to

schools and districts identified as in need of assistance by OEPA audits. During these calls, Office of School Improvement staff members explain the types of assistance that they can provide and work with schools and districts to provide targeted support.

Key Lessons

- **Governance.** West Virginia's Office of Education Performance Audits operates independently and of equal standing with, the Department of Education. As a result, OEPA is less inhibited as it evaluates schools and districts. Moreover, since the Board of Education has direct oversight of OEPA, it is better able to coordinate the work of both OEPA and the DOE. This governance structure provides a balance between independence and coordination of services.
- **Targeted Schools.** OEPA targets attention and resources to the highest need schools.

Kentucky Department of Education—Scholastic Assistance

Summary

Kentucky currently has in place a dual accountability structure that simultaneously focuses on schools and districts. Before the passage of No Child Left Behind, the state had a district and school accountability structure established by the Kentucky Education Reform Act. Following the passage of NCLB, the state combined the two systems to avoid losing any of the successes and accomplishments of their old system. The two systems include district reviews and school audits, each of which is described below.

District reviews are based on the federal NCLB legislation mandates and are prioritized using a three-tier assessment system. When a district does not meet AYP for four consecutive years, they are categorized as a Tier 3 district and must participate in a review process led by KY DOE staff. Also, if a school within a district is categorized under the school audit process (described below) as Level 3 for two consecutive review cycles, the district is then

reviewed. KY DOE created district level performance descriptors for state standards. These are compiled in a printed tool for districts to use as a resource for improvement. Indicators for success include:

- Academic performance: curriculum, instruction, classroom assessment
- Learning environment: school culture, student, family and community support, professional growth, development and education
- Efficiency: leadership, organizational structure and resources, comprehensive and effective planning

The district review team focuses on identifying what is working and what is not, and providing recommendations to the district leadership.

School-based audits function on a three-level assessment system and are based on the state accountability system. Scholastic audits are performed at schools categorized as Level 3 schools, which, by AYP definitions, are the lowest scoring one-third of schools in need of assistance. Level 1 and 2 schools also participate in audits. The KY DOE developed school level performance descriptors with the same indicators used for district level success and improvement measurements.

Both district audits and reviews and school audits and reviews utilize the same indicators of success, accountability plans, and goals. Reviews and audits also use the same evaluation teams. However, qualified district level staff is permitted to participate on the review teams for the Level 1 and 2 schools within their district. These teams are mostly comprised of retired educators who apply and are hired by the state DOE as well as DOE trained staff. To date, the state utilizes a trained group of 60 committed experts. Uniform training provided by the DOE is designed to ensure stability and consistency throughout the work and reports prepared by these evaluation teams.

In addition to reviewing underperforming schools, KY DOE performs scholastic audits within five percent of the successful schools throughout Kentucky. This is a critical feature as it allows the

state to collect examples of best practices that can be shared with the schools and districts targeted as low performing. By auditing a random sample of successful schools, the state can utilize existing models to show how high achievement levels are reached in Kentucky.

Governance

While the Board of Education oversees the district reviews and school audits conducted by the Kentucky Department of Education, there is also an Office of Education Accountability that is governed under the state's Legislative Research Commission. This office is charged with monitoring public education and making periodic reviews of local district- and school-based policies affecting personnel procedures, reviewing the education finance system, checking accuracy of school and district reports, and analyzing the state's assessment program through state and federal data analysis. The Office of Education Accountability focuses on compliance of administrative and financial statutes, while district reviews and school audits are diagnostic tools designed to identify areas in need of improvement.

Technical Assistance

Schools labeled as Levels 1, 2 or 3 are assigned a Highly Skilled Educator and receive access to commonwealth school improvement funds. Some districts labeled Tier 3 after a district review are paired with a Voluntary Partnership Assistance Team (VPAT) that provides comprehensive assistance to reform student achievement within the district. The VPAT team is comprised of a retired superintendent from the KY Association of School Administrators, Highly Skilled Educators from the KY DOE, and a school board member from an outside district, designated by the KY School Board Association. This team meets regularly and creates its action plan from the review team's scholastic audit report. Once this plan is created, district level leaders are chosen to oversee the progress.

Some districts that are reviewed by the state choose not to work with a VPAT team. These districts

are assigned a state assistance team to ensure that student achievement progress takes place. Another group of districts partners with Harvard University and other colleges and universities to improve student achievement and success districtwide. The state has agreed to review these districts again after one year of the partnership. Of these three types of technical assistance, student achievement data is most improved at the districts working with a VPAT team, somewhat improved at the districts working with the state accountability teams, and least improved at the districts with the college and university partnerships.

In 2006-2007, the state provided about \$10,000 per district for assistance and required each district to match that amount. If additional costs are incurred, the district must cover these costs with local funds.

Key Lessons

- **Governance.** Both the school audits and reviews and the district audits and reviews are overseen and coordinated by the Department of Education. This allows for uniformity in standards and requirements as the DOE ensures that the dual accountability systems are aligned and not duplicative.
- **Connection to Technical Assistance.** A strong technical assistance component follows the school audits and district reviews. Assistance teams who are paired with low performing districts are comprised of individuals representing the KY Association of School Administrators, the state DOE, and a school board member from another district. In addition to access to assistance teams, districts can receive other forms of assistance through the state Department of Education's District Achievement Gap Coordinators and Targeted Assistance Coaches.

International Case Examples

In addition to identifying models from other states, accountability systems outside of the United States were also reviewed. This section includes examples from England, New Zealand and Singapore.

England—The Office for Standards in Education

In April 2007, a newly designed Office for Standards in Education, Children's Services and Skills (Ofsted) was launched in England, bringing together the wide experience of four formerly separate inspectorates. The new Office inspects and regulates care for children and young people and inspects education and training for learners of all ages. The Office seeks to conduct objective school reports and to communicate its findings broadly. Ofsted reports directly to the British Parliament, which provides the independence that facilitates Ofsted's impartial information gathering and reporting. The Education and Inspections Act, which established the new Ofsted, specifically requires that the Office: promote service improvement, ensure services focus on the interests of their users, and see that services are efficient, effective and promote value for the money spent.

Options drawn from Ofsted:

- Ofsted uses post-inspection surveys called "School Inspection Survey Questionnaires" to allow schools to evaluate the process.
- Schools in England do not prepare for the inspection apart from completing a self-evaluation form prior to the inspection, significantly reducing the administrative burden of school audits.
- Ofsted also produces reports on nationwide themes in schools thus allowing it to share trends and best practices identified across districts.

New Zealand—Education Review Office

The Education Review Office reviews schools and early childhood education services every three years, and publishes national reports on current education practice. ERO reports directly to Parliament and is of equal standing with the Ministry for Education. ERO initiates reviews, investigates, reports and publishes findings about the provision of education to all students of New Zealand.

ERO carries out different types of reviews—education reviews, homeschool reviews, cluster reviews of education institutions and services, and national

evaluations of education issues. In an Education Review, ERO investigates and reports to boards of trustees, managers of early childhood education services and the government on the quality of education provided for children and students in individual centers and schools.

Reviews are undertaken once every three years, but more frequently where the performance of a school or center is poor and poses risks to the education and safety of the students. ERO's reports on individual schools and early childhood services are readily available to the public. From time to time, ERO also undertakes education reviews that look at groups or areas with common features. These reviews have resulted in reports on various topics, including the performance of schools in a defined geographical area, and on particular populations of students, such as boys.

Options drawn from ERO:

- Uses a “risk assessment” process as a basis for intervention in schools rather than relying strictly on whether or not a school is in compliance with mandates, which allows it to be proactive rather than waiting for the school to be in dire need of assistance.
- Serves a research function by producing reports focused on particular groups of students.

Singapore's School Appraisal Branch

The School Appraisal Branch provides consultancy on schools' self-assessment and conducts external validation of schools. The Branch provides information for continuous school improvement and focuses on enabling schools to be well-organized and managed to provide quality education. Prior to the creation of the School Appraisal Branch, school inspectors would appraise each school once every five years. Appraisals consisted of a team from the Education Ministry going to schools and examining school management and performance over the course of one to two weeks. These visits required significant preparation time and effort from principals and teachers.

In 2000, Singapore adopted a quality assurance approach to school appraisal based on self-assessment. The new quality assurance approach to school appraisal is designed to strike a balance between results and processes. The focus of the new approach is not merely positive results, but sustainability of those results. Schools now assess themselves in terms of approach (how outcomes are to be achieved), deployment (extent to which approach is applied) and results (degree of achievement of outcomes from applying the approach).

Options from the School Appraisal Branch:

- Use of annual self-assessments to focus all schools on creating conditions for success. The Education Ministry conducts on-site validations every four to five years.
- Reduction in teachers' and administrators' preparation time for on-site validations.

Policy Development Questions

To assist policymakers in identifying options for the development of a new accountability function, we have identified the following key questions for policymakers to consider:

- What is the rationale for the structure, governance, and operation of the accountability system?
- Should the accountability function be situated in the state department of education or independent from it?
- Should school and district accountability functions be unified?
- Which schools or districts should be evaluated? All of them or only those that are low performing?
- Should diagnostic and technical assistance services be unified? If not, what should be the process for connecting technical assistance with the new accountability function?

Policy Considerations

The policy considerations listed below summarize the key findings from the case examples described in this brief. These options, when considered in relation to the answers to the policy questions above, are intended to provide a range of possibilities for policymakers.

Consolidation. Policymakers might consider simplifying and streamlining the execution of the Massachusetts school- and district-focused review processes and better integrate the various types of accountability mandates into a more coordinated system while maintaining a focus on evaluating both programmatic and fiscal issues. New Jersey is one example of a more simplified accountability system.

Objectivity. Another consideration for policymakers is the degree to which the new accountability function ensures the independence of school and district reviews and develops a process in which political or bureaucratic practices do not taint review findings. Ohio and West Virginia have created systems intended to increase objectivity.

Connecting with Technical Assistance. Policymakers might also consider explicitly linking the accountability function to technical assistance and support as is done in Kentucky, New Jersey, Ohio and West Virginia. Low performing schools are often the least capable of turning themselves around, even when presented with data identifying specific areas in which they need improvement. By connecting districts directly to technical assistance, a new accountability function could ensure that low performing schools have access to the resources and support needed to improve.

Targeted reviews. Several states (Ohio, Kentucky, West Virginia, New Jersey and others) are moving toward a model that targets the lowest performing schools and districts and provides more intensive reviews based on the needs of the school and district. This holds the benefit of providing schools and districts with diagnoses and support that fit their needs (rather than a one-size-fits-all approach) while also making the best use of limited dollars. Massachusetts policymakers might also consider this approach.

Use of external partners. Policymakers may weigh the benefits of using external partners (as is done in New Jersey and Ohio), such as those from higher education, business and parent groups, who would serve as part of the external review team charged with evaluating a district's performance. Engaging partners from outside of public education might increase the capacity of the team, especially when conducting reviews of leadership, governance, and financial management.

Governance. Several options exist to alter the governance structure of the new accountability function. Some considerations include:

- *Situating the new accountability function within the Department of Education*—This would entail having some or all of the school and/or district diagnostic and/or technical assistance functions reside within the Department of Education where it would be integrated into the Department's work and overseen by the Board of Education.
- *Placing the new accountability function in the Executive Office*—This would involve placing some or all of the school and/or district diagnostic and/or technical assistance functions under an education secretary within the Executive Office.
- *Creating a separate entity that would be overseen by the Board of Education*—As with West Virginia's Office of Education Performance Audits, this option refers to the creation of a structure separate from the Department of Education where some or all of the school and/or district diagnostic and/or technical assistance functions are situated under the Board of Education.

Conclusion

Massachusetts has a clear interest in building a strong accountability function for schools and districts to ensure that every child, without exception, has access to excellent instruction and all the resources necessary to be successful in school and beyond. The question that lies before policymakers and which serves as the central focus of this policy

brief is: What is the best, most efficient place to situate this function and its elements (school and/or district focus, diagnostic review, technical assistance) in state government? Throughout this report, we have provided examples of accountability policies in other states and countries as well as questions for consideration in the development of a new accountability function. It is our hope that this information will contribute to the development of a clear rationale for the next phase of accountability in Massachusetts.

Alternative State Models At a Glance

Criteria used for Review/Evaluations/Audits	What is the governance structure?	Does this entity focus on the school, district or both?	Is technical assistance provided? If so, by whom?	What's the process used for technical assistance?
KENTUCKY Department of Education—Scholastic Assistance				
Audits & Reviews use indicators in: -Curriculum and instruction -Student performance -School climate -Professional development -Leadership -Resource allocation	An office within Kentucky Department of Education (KDE)	Both	-School level: Highly Skilled Educators -District level: Voluntary Partnership Assistance Program, or State Contact Team, or College/University partnerships	The school and district reviews are used as diagnostic tools. Schools and districts that are underperforming are automatically provided with technical assistance.
NEW JERSEY Quality Single Accountability Continuum (NJQSAC)				
District performance reviews evaluate: -Operations management -Instruction and program -Fiscal management -Governance -Personnel	Resides in the New Jersey Department of Education (NJDOE)	District	Yes, Highly Skilled Professionals, trained by the DOE, are assigned to work with districts that have been identified.	QSAC is integrated with NJDOE's state system of support through which assistance is provided.
OHIO Office of Policy and Accountability				
Diagnostic function consists of: -Data analysis -Document review -Interviews of district leadership, teachers and students -On-site observations	An office within Ohio Department of Education (ODE), the diagnostic function and intervention function are carried out by separate teams in the same office of the ODE	School and district, but only Tier 1 districts receive a state-conducted diagnostic review. All other districts are given access to the materials.	Yes, the ODE has established 16 regional teams. These 16 teams provide intense and targeted intervention based on the diagnostic review.	In the intervention phase, ODE provides assistance to districts in accordance with recommendations in the district's diagnostic review.
WEST VIRGINIA Office of Education Performance Audits				
Audits include: -Performance Assessment -Review of school and district Unified Improvement Plans -On-site reviews -School accreditation status -Use of resources	A separate entity that reports to the Board of Education, but is independent from DOE	-Schools (low performing) -Districts (if multiple schools within the district have been identified as low performing)	No. However, OEPA provides clear recommendations and links schools and districts to technical assistance from the DOE.	Identifies schools/districts in need and links them to DOE resources: Regional Education Service Agencies, the Center for Principals' Development, the School Building Authority.

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The Rennie Center is committed to diverse perspectives and voices in constructive policy discussion. With the Policy Perspectives series, we tackle “hot button” issues by reporting on the pulse of the education policy community and presenting a range of viewpoints about critical education reform debates. The series is another way in which the Rennie Center focuses attention on key issues, provides insight and perspective and helps shape an effective public education agenda.

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The Rennie Center’s mission is to develop a public agenda that informs and promotes significant improvement of public education in Massachusetts. Our work is motivated by a vision of an education system that creates the opportunity to educate every child to be successful in life, citizenship, employment and life-long learning. Applying non-partisan, independent research, journalism and civic engagement, the Rennie Center is creating a civil space to foster thoughtful public discourse to inform and shape effective policy.

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