THE PATH FORWARD FOR SCHOOL ACCOUNTABILITY:

Practical Ways to Improve School Accountability Systems Now

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THE PATH FORWARD FOR SCHOOL ACCOUNTABILITY:
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TABLE OF CONTENTS

THE PATH FORWARD FOR SCHOOL ACCOUNTABILITY:

Practical Ways to Improve School Accountability Systems Now

Center for Assessment

THE PATH FORWARD FOR SCHOOL ACCOUNTABILITY:

Practical Ways to Improve School Accountability Systems Now

INTRODUCTION

The last few years have produced a groundswell of interest in improving our school accountability systems. Some suggest it's necessary to fine-tune current practices. Others advocate sweeping reforms that pave the way for entirely different approaches. A range of perspectives fall between these ends of the continuum, of course, but support for the status quo is rare.

While the call for change is clear, it's not new. Criticism of the accountability requirements in the federal No Child Left Behind Act (NCLB) emerged shortly after its passage in 2001, and continued after its successor, the Every Student Succeeds Act (ESSA), passed in 2015.

Criticism of federal accountability requirements intensified in 2020, as the nation dealt simultaneously with two unprecedented crises: school closures driven by COVID-19 and a national reckoning with systemic racism. Together, those forces fueled a collective urgency to improve current school accountability practices.

What is the path forward? While we don't refute calls for sweeping reforms, in this paper we approach the question from a practical perspective. We attempt to illuminate issues and alternatives that can be addressed in the near-term, and we explore strategies that can work within or alongside ESSA. By focusing on improvements that are possible now, within the bounds of ESSA, we affirm the urgency of taking swift action to improve accountability.

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THE PROMISE OF ACCOUNTABILITY

Before we detail the issues and alternatives, it is important to define what we mean by accountability and how it is intended to support improved outcomes for students.

We focus primarily on systems developed by state education agencies (SEAs) to meet the federal requirements of ESSA. That legislation requires states to set goals for student achievement and measure the performance of schools and selected student groups with respect to those goals. ESSA stipulates that states must "establish a system of meaningfully differentiating, on an annual basis, all public schools in the State."[1] Accordingly, ESSA establishes categories or indicators that must be included in that system of annual meaningful differentiation (AMD).

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[1] Every Student Succeeds Act, 20 U.S.C. § 6301 (2015). https://www.congress.gov/bill/114th-congress/senate-bill/1177

More broadly, accountability is imagined as a system that 1) signals what outcomes are valued, 2) provides information about school performance on those outcomes, and 3) identifies supports and interventions based on performance.[2] As we will discuss in more detail later, the accountability system alone is not a means for school improvement. Rather, it is part of a larger system that specifies a coherent set of conditions, resources, and supports required to promote the desired improvements. Detailing these elements and their interactions can be thought of as a theory of action that is critical to achieving the system's goals. Accountability, in some form, may be necessary, but it is not sufficient for school improvement.

WHAT IS THE PROBLEM WITH ACCOUNTABILITY?

What is keeping accountability from fulfilling its promise? Common critiques describe school accountability systems as:

- **Narrow.** Accountability systems are heavily influenced by proficiency in English language arts and mathematics. Critics argue there are many other measures that matter (academic and otherwise) and an overemphasis on large-scale assessments narrows the curriculum and deters or ignores other initiatives important to student success.

- **Not useful.** Current systems are increasingly complex and inscrutable to many of those they're intended to serve. The timing of assessments used for accountability, and nature of their results, don't help school and district leaders improve outcomes for students in a timely fashion. Some argue that current systems actually divert attention from more authentic and helpful sources of information.

- **Punitive.** Accountability results can lead to consequences that are counterproductive, if they're used as a tool to publicly shame schools or student groups.

- **Unfair.** Accountability systems may establish incentives that are misaligned (e.g., rewards based on comparison that thwart cooperation) and/or expectations that are unattainable. This is exacerbated by a concern that the deck is stacked against schools in underserved communities.

- **Ineffective.** There is little evidence that contemporary accountability practices have helped improve outcomes for students, schools, and communities.

WHAT IS NEEDED?

More sweeping changes to school accountability would be feasible if we change federal law. Some of us have detailed such recommendations separately.[3] But we believe there are practical steps that leaders can take now to incrementally improve accountability within the constraints of current

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[2] Domaleski, C., Betebenner, D., & Lyons, S. (2018). Promoting more coherent and balanced accountability systems. National Center for the Improvement of Educational Assessment. https://www.nciea.org/library/promoting-more-coherent-and-balanced-accountability-systems/

[3] Marion, S., Domaleski, C., & Brandt, C. (2020). Assessment and accountability recommendations for the next reauthorization of the Elementary and Secondary Education Act. National Center for the Improvement of Educational Assessment. https://www.nciea.org/library/assessment-and-accountability-recommendations-for-the-next-reauthorization-of-the-elementary-and-secondary-education-act/

federal law. Our suggestions prominently focus on design, which we believe is a critical part of improving systems and practices.

In this spirit, we offer five strategies that can work within and alongside states' ESSA-required systems to create more coherent, balanced, comprehensive, and effective systems of accountability.

- **Develop a comprehensive theory of action.** The design and implementation of the system must be connected to clear statements of states' priority goals, intended uses, and conditions for success. A theory of action serves as both a roadmap for design and a tool for validation.

- **Employ a principled design process.** The process for developing, implementing, and evaluating the accountability system matters as much as the system itself. Decisions should be influenced by a broad range of stakeholders to improve ideas and foster buy-in.

- **Support customized approaches.** Accountability systems should not be one-size-fits-all. More effective systems offer flexibility to account for the unique contexts and conditions of schools and communities.

- **Measure more of what matters.** To bring about a more inclusive set of desired actions and outcomes, go beyond academics and use a broader range of indicators that more fully capture important dimensions of school quality and student success.

- **Connect information to support.** Reporting is just the start. Improvement will not happen just by making data public and hoping users know how to act on it. To be most useful and effective, states must connect accountability systems to the conditions, supports, and resources that are likely to promote the intended outcomes.

In the next sections, we more fully describe these strategies and suggest some promising practices.

> *More sweeping changes to school accountability would be feasible if we change federal law. ... But we believe there are practical steps that leaders can take now ...*

DEVELOP A COMPREHENSIVE THEORY OF ACTION

Theories of action aren't just airy proclamations; they're crucial roadmaps that specify how states intend accountability systems to work to bring about desired outcomes. As states test their theories of action through system implementation, they must continually evaluate them to confirm that their underlying assumptions hold.

To ensure that their accountability systems produce the results states intend, they should include key steps in their theories of action.[4]

> *Theories of action aren't just airy proclamations; they're crucial roadmaps ...*

[4] These steps are adapted from Marion, S. M., Lyons, S., & D'Brot, J. (2016). Developing a theory of action to support high quality accountability system design. National Center for the Improvement of Educational Assessment. https://www.nciea.org/library/developing-a-theory-of-action-to-support-high-quality-accountability-system-design/

1. Clearly describe the goals, purposes, and uses of the system.

2. Agree on the long-term intended outcomes of the accountability system (e.g., increase rates of college and career readiness) and the expected intermediate outcomes (e.g., improve curriculum and instruction).

3. Create an initial high-level model to describe the major components relevant to accountability, reporting, school improvement and their relationships.

4. Zoom in on the major components of the theory of action to specify the hypothesized mechanisms between intermediate and final outcomes, such as how reporting informs supports or other improvement actions.

5. Specify the underlying assumptions that must hold for the accountability system to drive the improvement, funding decisions, or actions as intended.

When states detail the goals, outcomes and assumptions of their accountability systems in theories of action early in the design phrase, they can determine in advance whether those systems will interact in positive ways with other state and local educational initiatives. But theories of action also play an important role later on, in the development and implementation stages, as powerful touchstones that articulate the ways the system should be working.

A comprehensive theory of action may be difficult to develop, especially when the perspectives of designers and users—families, students, educators, administrators, policymakers—should be included. But time spent in the early stages of design explicating a theory of action will prove efficient later, in helping to resolve conflicting priorities and ensure that the operational system accurately reflects the state's priorities.

EMPLOY A PRINCIPLED DESIGN PROCESS

Any consequential accountability initiative should be supported by a process that includes a broad range of perspectives, opportunities for pressure-testing, and feedback loops to ensure early assumptions are borne out later in the process.

Like any complex system, accountability is based on a series of dependencies. The quality of any one step is contingent on the quality of each preceding decision. Documenting these decisions and compiling evidence at each step can identify weak points in the plan early on, and build a validity argument for a state's accountability and improvement systems.

To do that, however, states must first recognize the decision points where it's important to identify the most relevant evidence. Collecting this evidence can help instill confidence in design decisions, system processes, school performance expectations, and the delivery of services and support.

We propose five general steps in the design process:[5]

1. The **design stage** includes refining the system's overall vision and theory of action, including its policy priorities, educational system goals, and the role of accountability; identifying and

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[5] These steps are described more fully in D'Brot, J. (2022). The operational best practices for accountability. Council of Chief State School Officers. https://www.nciea.org/library/the-operational-best-practices-for-accountability-2/

defining its chosen indicators, such as growth, college and career readiness; and determining policy weights to capture a state's values and priorities (whether growth and achievement should be equally weighted, for instance).

2. The **development stage** includes examining indicator measures and the relationships among them, including descriptive and inferential analyses, qualitative reviews of data and processes; identifying potential data gaps or capacity concerns through the use of simulations, such as projections, historical data examinations, mock accountability runs; and specifying expectations over time by setting defensible performance standards.

3. The **implementation stage** includes supporting the development and release of reports; helping stakeholders access, use, and interpret information; and defining and delivering support and interventions. These activities can help inform local inquiries and information use.

4. The **evaluation stage** includes considerations for evaluating system design and implementation, such as substantiating the claims being made throughout the design, development, and implementation stages of an accountability system, by using relevant evidence. While beyond the scope of this paper, evaluation efforts can also include examinations of the accountability system's impact and utility.

5. The **revision stage** includes documenting the rationale for proposed changes, determining and defining a change-management process, modeling changes to the system, and evaluating the implications of the proposed modifications. These changes should then be documented and communicated to stakeholders. Any revisions to the system should be subjected to the same evaluation and revision strategies outlined here.

Including stakeholders in meaningful ways at key points throughout the stages of accountability design ensures that those who are affected by the system have a say in it. But that inclusion serves other important purposes, too: It allows designers to elicit support, identify potential weaknesses, establish face validity, and create a shared sense of responsibility for successful implementation. In short, engaging stakeholders results in better systems.

Including stakeholders in meaningful ways at key points throughout the stages of accountability design ensures that those who are affected by the system have a say in it.

Obtaining broad-based input can also support equity in design by ensuring that people of varied backgrounds and lived experiences have an opportunity to contribute to decisions about the extent to which the system supports their values and priorities and avoids unintended negative consequences. Here, we present five key strategies for states to consider as they explore the role stakeholders should play in accountability design:

1. **Establish a stakeholder inclusion plan early.** States should identify stakeholder groups and their roles, ensuring that their roles are well matched to the experience and expertise of the participants. For example, some stakeholder groups may advise on policy priorities, while others may offer feedback on implementation strategies.

2. **Consider diversity in selecting stakeholder representatives.** Input from stakeholder groups should reflect the composition and diversity of the state population. Constituents

should be considered consumers of both the accountability system itself and the information it provides. This will influence how deeply and frequently stakeholder groups are involved, consulted, or informed.

3. **Plan to share the state's initial vision and priorities.** Each stakeholder group should have the opportunity to understand the state's vision and priorities. These sessions can also be used as opportunities to test the state's vision and message, and develop the communications plan.

4. **Engage stakeholders to refine or extend the state's vision, priorities, and intended outcomes.** The type and level of engagement should be informed by the intended role of each stakeholder group. The state should design meetings with clear outcomes in mind, identify the key points of feedback or input, and prepare support materials to maximize stakeholders' input.

5. **Identify technical advisors to supplement representative stakeholders.** While stakeholders play a vital role in shaping an accountability system, their focus is often primarily on policy priorities or implementation strategies. Technical advisors can help states establish a plan to substantiate claims about the accountability system's fairness, reliability, and validity. States should establish a structure for a technical advisory group and how their feedback will be incorporated. This process will support the state's overall validity argument.

SUPPORT CUSTOMIZED APPROACHES: FLEXIBILITY AND FREEDOM

ESSA allows states flexibility to decide how they'll meet the law's requirements. They also have the freedom to add requirements to their accountability systems to reflect their own priorities. This flexibility and freedom can help states avoid or mitigate many of the factors that spark criticism of accountability systems.

There are important flexibilities within the law—and freedoms beyond it—that afford states the chance to design more robust and valuable accountability systems.

Here's an example of ESSA's flexibility. It requires states to design accountability systems that designate schools as qualifying for "Targeted Support and Improvement" (TSI), "Additional Targeted Support and Improvement" (ATSI), "Comprehensive Support and Improvement" (CSI), or "Other" forms of support. However, ESSA allows states flexibility to determine how they identify schools for support; an examination of rates of school identification reveals that states have taken advantage of this flexibility. Rates of school identification at the two levels that bring the strongest levels of state intervention—ATSI or CSI— range from approximately 5 percent of all schools in some states to more than 60 percent in others.[6]

States have also taken advantage of the freedom to add requirements to their accountability systems to reflect their needs and priorities. Nothing in ESSA requires states to differentiate school performance in ways other than designating them as TSI, ATSI, CSI, or Other, but most states have

[6] Stark Renter, D., Tanner, K., & , M. (2019). The number of low-performing schools by state in three categories (CSI, TSI, and ATSI), school year 2018-19. A Report of the Center on Education Policy. Cited by Wing Institute (2019): https://www.winginstitute.org/news/states-identification-of-low-performing-schools-under-the-every-student-succeeds-act-essa/

chosen to do so. A handful of states have implemented "A through F" grading systems, for instance. These results vary widely from state to state, too: the proportions of D and F schools range from less than 15 percent of all schools to more than 60 percent.[7]

We assume that the states' rates of identification and grade distributions are under the states' control as the accountability systems were being designed, and that the designs and outcomes reflected the states' values, purposes, and policy contexts. In other words: If a state wanted a different outcome, the federal law doesn't constrain them.

Many states use this freedom to go beyond ESSA as a way to supplement their federally compliant accountability systems. We can see this in the ways states support schools and districts in providing equitable opportunities to learn.

ESSA requires that states provide support to schools identified for CSI or ATSI, and districts and schools provide support for schools identified for TSI. States can go beyond these requirements, however, and provide additional supports. Some states provide supports to many lower-performing schools, not just those identified under federal accountability rules. States may also provide support for initiatives such as vetting high-quality instructional materials, professional development services, or interim and other classroom assessments.

> *If a state wanted a different outcome [in school identifications], the federal law doesn't constrain them.*

Moreover, states may work with districts to identify, recruit, develop, and retain highly effective teachers and administrators, and encourage districts to support placement of those teachers with students and schools that need them most. States can also work on funding formulas and work with local governments to support local taxation laws that reduce systemic barriers that have fostered socioeconomic and racial/ethnic achievement gaps.

Beyond ESSA, states are free to develop customized approaches to accountability for exceptional schools such as alternative schools. Such systems can be designed to fit the unique missions and contexts of alternative schools and provide more useful information to inform improvement.

States may also support specialized district accountability initiatives. Since ESSA is largely silent about district accountability, states have considerable freedom in designing and implementing these systems. Contemporary accountability systems at the district level, if they exist at all, often treat districts like a "super school" by simply aggregating the same school measures to the district, effectively mirroring the state's standardized school model. District systems may be more effective if they take advantage of flexibility to address their distinct goals, priorities, and unique responsibilities. Moreover, because districts influence curriculum, they can address academic performance in a more timely manner, at a smaller grain size, than the state can.

How can states support more effective district accountability practices? One approach is to develop explicit district accountability requirements at the state level. Alternatively, states may elect to

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[7] This is not an endorsement of A-F school grading schemes. We chose this example because of the ease of comparing results across states. It also shows the falsity of a common maxim: that the public will inherently understand what A-F school grades mean. For further reading, see Domaleski, C. (2018, July 18) When it comes to school ratings, meaning matters. National Center for the Improvement of Educational Assessment. https://www.nciea.org/blog/when-it-comes-to-school-ratings-meaning-matters

provide guidance and support, such as by disseminating model resources or practices for districts to voluntarily use or adapt. Whatever the approach, states should avoid requirements that impede district innovation.

In sum, it is true that ESSA provides little flexibility about some things: It emphasizes state assessments of English language arts/reading and mathematics, for instance, with little room for other content areas. But there are important flexibilities within the law—and freedoms beyond it—that afford states the chance to design more robust and valuable accountability systems using the principles discussed in this paper.

MEASURE MORE OF WHAT MATTERS

Under NCLB, achievement in mathematics and English language arts/reading became the primary indicators used to differentiate school performance and identify the lowest-performing schools. ESSA provided states more flexibility to include a range of school performance indicators. Most states incorporate academic growth in their school accountability systems, for example. Moreover, states have included measures of school quality and student success (SQSS) such as chronic absenteeism and school climate. Many states also introduced "on track" and college readiness indicators that rely on course enrollment and performance outcomes.

Despite substantial progress, significant constraints remain. Although achievement scores provide important information to monitor academic performance for all students and ESSA student groups, focusing too narrowly on these test-based indicators can be problematic. A narrow focus on achievement may ignore other values and priorities that stakeholders deem essential qualities of a school.

'Big A' and 'Little A' Systems

States and districts sometimes refer to their systems of accountability as serving "big A" and "little A" purposes. "Big A" purposes address formal ESSA and state-required policies related to differentiating school performance, and rating and identifying schools for improvement (e.g., CSI, ATSI, TSI). "Little A" purposes focus on informal accountability such as reporting.

Key decisions about how indicators are defined, operationalized, and weighted affect which schools will be identified for improvement. Thus, policies that dictate these decisions should be carefully and thoughtfully designed, especially when they are used for "big A" purposes. Any "big A" indicator is subject to Campbell's Law. Campbell's Law states that the more any quantitative social indicator is used for social decision-making, the more subject it will be to corruption pressures and the more likely it will be to distort the social processes it is intended to monitor. Given the stakes involved in using ESSA indicators to differentiate schools, and to identify the lowest-performing schools, these indicators are ripe for corruption. Thus, states should consider the extent to which data underlying each indicator can support valid interpretations when they are subject to the pressures associated with CSI, ATSI, and TSI

> *Any "big A" indicator is subject to Campbell's Law … the more [it] is used for social decision-making, the more subject it will be to corruption pressures …*

identification.[8] States that elect to develop separate accountability systems must consider how to mitigate the risk of sending mixed signals.

Beyond formal accountability systems, there is a wide range of information that may help schools and teachers monitor and evaluate the extent to which programs and practices are helping promote academic progress, as well as the physical, social, emotional, and executive functioning required to develop and thrive both in and out of school. To avoid misuse or unintended negative consequences, states will likely find that such indicators are better suited for informal or "little A" accountability.

Expanding Indicators

In this section, we provide examples of indicators that states may consider including in their formal or informal systems of accountability and support.

- **Progress monitoring:** These indicators enable within-year progress monitoring towards standards and competencies, and may include performance assessments and digital portfolios.

- **College and career readiness:** These indicators look at how well students are prepared for college and career pathways, and can be used to signal how well students are prepared for the post-secondary world. Examples include access to and enrollment in rigorous coursework, graduation rates, enrollment in post-secondary school or the military, workforce certification rates, and employment rates.

- **Opportunity to learn:** These indicators look at access to resources, opportunities, and support for different student groups. Examples include access to courses, technology, or supplemental educational services.

- **Student engagement:** These indicators look at how engaged students are in their learning and school activities and can be used to inform the quality of the learning environment. Chronic absenteeism has been used as a proxy for engagement. Other examples of engagement include attendance and stakeholder surveys.

- **School climate:** These indicators look at the overall school environment, and can be used to address the quality of the school culture. Examples of school climate indicators include stakeholder surveys, suspension and expulsion rates, and measures of social and emotional learning.

- **School finance and staffing:** These indicators look at how equitably resources such as money and effective teachers are being distributed so that all students have sufficient support to achieve success.

A 2019 report by the National Academies of Sciences, Engineering, and Medicine, *Monitoring Educational Equity*, provides the architecture for a system to help policymakers and practitioners address equity and improvement at the agency level (i.e., state and district agencies), noting 16

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[8] For more information about identifying valid indicators and evaluating the accountability system, see D'Brot, J., Landl, E., Domaleski, C., & Brandt, C. (2020). Restart & recovery: Considering the outlook for school accountability. Council of Chief State School Officers. https://ww.nciea.org/wp-content/uploads/2021/11/CCSSO_RR_Outlook_Accountability-v4.pdf. See also Domaleski, D., Boyer, M., & Evans, C. (2020). Restart & recovery: Accountability interrupted. Council of Chief State School Officers. https://ccsso.org/sites/default/files/2020-09/CCSSO_RR_Accountability-v3.pdf

categories of indicators that fit within the categories we listed above.[9] The report is a helpful resource for education agencies in moving beyond ESSA requirements and prioritizing both equity and improvement in their "little A" accountability systems. Importantly, the report emphasizes the role of process and opportunity indicators, which are often absent from contemporary accountability or reporting systems, as key levers to support equity.

Ultimately, state reporting systems cannot replace the finer grained information that districts and schools collect and use. Local systems have much more information to guide local improvement decisions than the state can provide. State reporting systems can provide system checks to ensure that improvement efforts are moving the needle over time, but improvement at school relies on broader and deeper information that is likely beyond the scope of state systems. What states can do is situate these reporting and accountability systems in a manner that connects to, informs, and reinforces local improvement work.

CONNECT INFORMATION TO SUPPORT

Improving Reporting Resources and Practices

To realize the promise of accountability, states must create federal accountability reports that convey much more information than school classifications. ESSA emphasizes school improvement planning as a prominent requirement for identified schools (and eliminates the punitive consequences required in NCLB). This focus on improving schools lends itself to new kinds of reports: reports with a fuller array of measures that could contribute to the improvement process. This prospect requires states to consider how all their reported data will be used.

> *To realize the promise of accountability, states must create federal accountability reports that convey much more information than school classifications.*

Designing accountability reports that could serve as a *starting point* for school improvement planning represents a meaningful shift in ESSA requirements for identified schools. We examine this shift because it represents no small task. It reflects the primary purposes for ESSA accountability reporting:

1. Demonstrate how and why a school qualifies for certain ESSA identifications;

2. Help readers understand what the data in the report signal about school and student group performance; and

3. Provide sufficient detail to initiate and inform improvement planning at the local level.

Demonstrate how and why a school qualifies for ESSA identifications
It is important that states' reports clearly present ESSA school identifications. But if reports are to be truly helpful to school and district leaders, they must make clear the roles school and student group outcomes played in the school identifications. This involves:

• Clearly displaying each indicator outcome for all students and each student group

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[9] National Academies of Sciences, Engineering, and Medicine. (2019). *Monitoring Educational Equity.* Washington, DC: The National Academies Press. https://nap.nationalacademies.org/catalog/25389/monitoring-educational-equity

- Clearly stating how much an indicator's outcomes contribute to a summative score, rating, and/or identification

- Emphasizing group outcomes that most influence a school's score, rating, and/or identification

Help readers understand what the data mean

Reports should be designed to support their intended use. This means that states should design reports with readers in mind, to help them understand what the data signal about school and student group performance. What does this look like? In our experience, such reports:

- Provide relevant contextual information about the school, such as demographic or socioeconomic enrollment information, staffing, and additional services or activities offered. Information like this encourages readers to consider context alongside performance.

- Ensure that outcomes are displayed equally for all students and each student group.

- Provide the question(s) an indicator answers and, if needed, the question(s) it does not answer.

- Describe school and group outcomes in sentences, not just in tables and graphs.

Provide sufficient detail to initiate and inform improvement planning at the local level

All too often, school leaders review their accountability reports and respond: "But what does that *mean*?" This question—regardless of whether a school has a federal identification—shows how important it is for reports not only to help school and district leaders understand the data, but to help those leaders understand what to do next. The most powerful way to do this is to explore good, explanatory state data, along with local data, in ongoing conversations with state or local school improvement teams.

All too often, school leaders review their accountability reports and respond: "But what does that mean?"

Local improvement processes should involve local data, since it is likely more timely and may include information about adult practices that are critical to understanding student outcomes. The role of ESSA reports is to promote and support these activities by including critical data, descriptions of what the data mean (and don't mean), and guiding questions and statements that inform and reinforce local data inquiry activities. They should prompt questions like, "Why do we see lower attendance rates and mathematics outcomes for multilingual learners in our school?" Answering these questions may lead to examining local data such as teacher assignment or grading patterns for different student groups or results from root cause analyses.

Local leaders need key insights from state reports, such as disaggregated outcomes for all applicable student groups and participation/inclusion rates for all measures. Reports should make clear which outcomes qualify a school for identification. A school identified for CSI, for example, may also have student groups that qualify for ATSI identification. The school may receive only one designation, but the fact that individual groups qualify for multiple identifications should not be ignored.

Helping local leaders understand what the data mean requires including interpretive statements, such as, "Attendance rates for this student group are lower this year than they were last year," or, "Average growth rates for students in this group have decreased over the last three years." Guiding

questions also help readers understand and interpret the data by making clear what questions certain data do or do not answer. For example: "What percentage of students graduate from this high school within four years?"

Reporting is not a one-way street. Part of a comprehensive strategy to connect information to support involves activities such as:

• Producing supplemental resources, guides, and/or development sessions to help users understand and respond to system data

• Regularly collaborating with school improvement teams to review data and identify and monitor the success of support initiatives.

Ultimately, information is most useful when it is presented clearly, addresses context, provides detail, and is accompanied by meaningful support for interpretation and use.

Specifying a Support System

Those who bemoan the shortcomings of accountability are almost always talking about the systems of annual meaningful differentiation: the collection of data used to summarize school outcomes, and the descriptions of how those outcomes are related to school identifications. They often argue that these systems are limited, and don't, by themselves, improve schools. We don't disagree.

> *Systems of annual meaningful differentiation [of schools]...are limited, and don't, by themselves, improve schools.*

But the premise of this argument falls into a convenient trap: thinking of accountability only as *these data and reports*, and no other information or activities. In reality, accountability systems should be much more than the data that comprise a specific annual report.

To realize the promise of accountability, we must un-silo its reports and identifications from the work of school improvement planning and support. Bringing them together requires us to:

• Include supports when we design the system that will produce reports and school identifications. We must design the measurement and reporting systems to reflect how they will be used.

• Consider what the accountability reports signal when we plan and provide supports. We should examine the data with an eye toward providing supports that respond to the needs identified in the reports.

• Intentionally coordinate and connect the various resources we provide—for accountability data and reports, and for support systems—so they reinforce one another.

Including supports in accountability system design
When we discuss designing accountability systems, we often talk about the importance of specifying and supporting the conditions that will lead to our desired outcomes. To facilitate the creation of those conditions, it's critical that we consider systems of support while we're designing accountability systems. Too often, they're an afterthought (if they're considered at all).

Support systems should include both the resources to facilitate better understanding, interpretation, and use of accountability reports *and* the systems, structures, and requirements that reinforce school improvement activities. Earlier, we detailed how the resources should change to support school improvement; now we explore changes needed in the systems, structures and requirements that support those improvements.

Relationships between state agencies and districts vary, since states are required to set performance expectations. But state agencies are still obligated to pair those expectations with, at a minimum, information about effective strategies to improve student learning, effective practices in the selection and implementation of appropriate and high-quality curriculum, instructional materials and assessments, and tools that support school improvement activities. When strategizing about what to create, we suggest prioritizing these types of documents:

• Big-picture descriptions of the accountability system: indicators, weights, identifications

• Explanatory guides to the accountability report

• Descriptions of each indicator in the accountability report, and details about calculations, data definitions, and relevant business rules

• Continuous improvement resources, such as fishbone diagrams for exploring root cause and rubrics for implementing improvement cycles

• For schools that qualify for federal identification, information on requirements and supports and how to access them.

Developing these kinds of resources will benefit from intentional inclusion of their primary users in schools and districts, such as school leaders, directors of curriculum and instruction, Title III, and special education, and assessment coordinators, among others. It would be beneficial, also, to include staff within the state agency that can access and interpret accountability results, such as school improvement, content, special education, and English-learner support staff. If the resource-development process includes the people who'll use the resources, it will be more likely to produce materials that meet their needs.[10]

Considering what accountability results signal when planning supports

Accountability systems should clearly and consistently connect schools' identified needs to the appropriate interventions and improvement activities. Just as school improvement expectations and best practices should be considered during the measurement design process, accountability results should be considered in school improvement activities. In other words, a school's needs—as identified by accountability data and other sources—should directly inform the supports offered by the state.

> *Accountability systems should clearly and consistently connect schools' identified needs to the appropriate interventions and improvement activities.*

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[10] These stakeholders should also be included in key decisions about criteria for school identifications and exit.

State-level outcomes may influence decisions about how state agencies will prioritize support activities and resources. Trends signaling drops or stagnation of performance in a certain content area, for example, should reasonably prompt accountability, school improvement, and other appropriate content-area staff to discuss what may be needed to help schools improve in this area. And as with the design of accountability reports, including other stakeholders, such as appropriate school- and district-level staff, in reviewing state data and planning will further illuminate needs that the state may help address.

States also have a role in providing technical assistance to districts that serve a significant number of schools implementing comprehensive or targeted support and improvement plans. To connect this role to the accountability measurement system, the state should clearly articulate the characteristics of strong improvement plans. While states may identify some characteristics that are unique to schools' contexts, certain things are prerequisites schools need to create the conditions that will improve outcomes. These include:

• Ensuring that a high-quality needs assessment has been conducted with relevant state and local data, and that the needs assessment includes an examination of root cause

• Producing a clear rationale that justifies selected evidence-based strategies based on identified needs

• Ongoing monitoring of improvement activities that involves review of relevant local and state data.

School improvement is ultimately a local activity, but it should neither ignore the state accountability reports that signal its needs nor be informed solely by those reports. As such, decisions about what supports to offer and how to structure them should acknowledge and make space for additional data as part of a school's continuous improvement cycle. These other data should come from needs assessments, including root-cause analyses and selection and implementation of improvement interventions and activities.

Coordinating and connecting accountability and support resources
Staff in state agencies are often charged with communicating about complex systems not only to school and district leaders, but also to the broader public. These resources tend to separate accountability measurement systems from school support systems, again reinforcing the idea that these systems are discrete.

If these *interconnected* systems are to meet the promise of accountability, and promote actions that result in improved conditions and outcomes for all students—especially those historically most marginalized—they must acknowledge and overtly present their interconnectedness.

Those connections can take many forms. Accountability reports could describe how their data can be used in school improvement activities. Those reports could include explanatory information about what it means to be a school that qualifies for comprehensive, targeted, or additional targeted support, and what requirements apply. State materials that mention school improvement requirements and best practices could make direct references to accountability reports as an appropriate starting point for needs assessment with root-cause analysis.

Ultimately, any accountability resources should reinforce the role accountability data should play, alongside other data, in a continuous improvement cycle as schools work with state staff to select and implement appropriate interventions to address identified needs.

CLOSING THOUGHTS

While broader reforms to federal accountability policy would be helpful, there are important near-term steps leaders can take to improve the design, implementation, and evaluation of their accountability systems under ESSA. Those steps should be guided by a comprehensive theory of action that addresses more than outcomes; it must specify the conditions and resources required for success.

Taking steps to improve accountability is particularly important right now. Our schools and students need more support than ever ...

We urge states to use a design process that draws on contributions from a broad-based group of stakeholders. We believe that more effective systems are flexible and customized to account for the unique contexts of schools and communities, and include broader measures that better capture the full range of school quality. Finally, it is critical to explicitly connect school accountability to well specified support systems.

Taking steps to improve accountability is particularly important right now. Our schools and students need more support than ever as they emerge from the pandemic with a keen awareness of the ways schooling fails them, and continue to wrestle with systemic inequities. Accountability's origins are grounded in improving schools and easing inequity; never has there been a more important time to take steps that will bring us closer to realizing its promise.