



Superintendents' Recommendations for a New Federal Framework for Educational Accountability

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Abstract: The members of the Large Countywide and Suburban District Consortium—a group of large, highly diverse, and successful districts across the country—have made great strides in achieving college and career readiness for all students. While they are succeeding, the consortium proposes that more could be done to accomplish their objectives through collaboration with Congress to establish federal policy and laws aligned with practices that foster college and career ready outcomes at scale. This article, introduced by Baltimore County Public Schools Superintendent S. Dallas Dance, proposes the critical principles that should undergird a new federal approach to state and district accountability.

Keywords: superintendents; accountability; federal policies.

Recomendaciones de Secretarios de Educación para un nuevo marco para modelos de responsabilidad educativa a nivel federal

Resumen: Los miembros del Consorcio *Large Countywide and Suburban District* -un grupo de distritos escolares de gran tamaño, muy diversos, y con éxito en todo el país, han conseguido grandes avances en la preparación universitaria y profesional de todos los estudiantes. Mientras el consorcio está satisfecho con estos logros, propone que se puede hacer más para lograr sus objetivos a través de

procesos de colaboración con el Congreso Nacional para establecer una política federal y sancionar leyes en consonancia con prácticas que mejoren la preparación universitaria y profesional de todos los estudiantes a escala nacional. En este artículo, preparado por el Secretario de Instrucción Pública del Condado de Baltimore S. Dallas Dance, propone los principios fundamentales que deberían sustentar una un nuevo enfoque federal para un programa de modelos de responsabilidad educativa a nivel de los distritos y estados.

Palabras clave: secretarios de educación; modelos de responsabilidad educativa; políticas nacionales.

Recomendações de Secretários de Educação para um novo marco sobre responsabilização educativa ao nível federal

Resumo: Membros do Consórcio *Large Countywide and Suburban District*, um grupo de grandes, distritos escolares com uma população muito diversa, e com sucesso em todo o país têm feito grandes progressos na preparação dos estudantes para estudos universitários e para carreiras profissionais de todos os alunos. Embora o consórcio esteja satisfeito com essas conquistas, propõe que se pode fazer mais para alcançar seus objetivos através de processos de colaboração com o Congresso Nacional para estabelecer uma política federal e promulgar leis em conformidade com as práticas que melhoram a preparação dos estudantes para estudos universitários e para carreiras profissionais em todo o país. Neste artigo, elaborado pela Secretaria de Educação Pública do Condado de Baltimore S. Dallas Dance propõem os princípios fundamentais que devem sustentar uma nova abordagem federal para um programa de responsabilização educativa ao nível dos distritos e dos estados.

Palavras-Chave: secretários de educação; modelos de responsabilização educativa; políticas nacionais.

Introduction

The nation's students are inheriting a world that demands advanced knowledge and skills in an evolving global economy. District superintendents from the Large Countywide and Suburban District Consortium (Consortium) have responded to lead multi-faceted accountability systems that transform teaching and learning, raise achievement, and close achievement gaps. To facilitate these efforts, federal education policy must evolve to help districts prepare every student for college and career readiness.

The Elementary and Secondary Education Act (ESEA), last reauthorized as the No Child Left Behind Act, established high expectations for all students as well as the importance of publicly reporting disaggregated data to monitor the performance of student groups. While student performance is improving incrementally, the next reauthorization of ESEA must address the need for every student to graduate from high school prepared for postsecondary education and challenging jobs.

Members of Congress invited the Consortium to propose a next generation accountability framework based on our collective experiences leading large, highly diverse, and successful school systems. The resulting report, "21st Century Education Accountability: Recommendations for a New Federal Framework," describes strategic federal involvement in education focused on preparing every student for a successful future.

To achieve college and career ready outcomes at scale, the Consortium set forth principles that redefine accountability built on shared responsibility and trust of educators and districts instead of top-down compliance. Major themes include focusing on teaching and learning, continuous

improvement, earned autonomy, innovation, shared accountability, and multiple measures.

The Consortium recommends a federal accountability framework that will empower districts to improve and innovate, while continuing a laser focus on equity, progress, and success for every student.

1. Establish 21st century outcomes as the goal of all major education laws and policies.
2. Require academic content standards and student academic achievement standards aligned with college- and career-readiness outcomes.
3. Promote the development and use of high-quality assessment systems and other valid measures of college- and career-readiness.
4. Promote innovation and continuous improvement in schools and districts.
5. Ensure equitable access to effective educators.
6. Promote transparency, engagement, and shared accountability through appropriate reporting of data and information.

We look forward to collaborating with Congress to bring about legislation that will make good on the promise of ensuring high-quality education for every student in every school and community. The future of our nation depends on us.

21st Century Education Accountability: Recommendations for a New Federal Framework

America's primary K-12 education law, the Elementary and Secondary Education Act (ESEA), was last reauthorized over a decade ago. At the time, nearly every state and school district had considerable work to do to ensure that clear, high expectations existed for all students, that the performance of every student group was valued and monitored, that data collection and use was commonplace, and that persistent underperformance was not tolerated. A tremendous amount of work has been done toward those ends by members of the Large Countywide and Suburban District Consortium (Consortium), a growing group of large, highly diverse, yet successful districts representing states across the country.

Consortium members, and other high-capacity districts, continue to raise expectations for all students through the implementation of college- and career-ready (CCR) standards, and are building the internal capacity needed to meet the learning needs of each individual student. We are succeeding, but more could and would be done to accomplish these objectives if we were assisted by federal policy and laws that unambiguously supported our efforts.

Now is the time for Congress to provide that assistance through the reauthorization of the core K-12 education laws, including ESEA. Consortium leaders call for the development of a common sense accountability framework...one that provides the stability and coherence districts need to improve teaching and learning and that recognizes the vital, but limited, role of the federal government.

Congress should act now, through a bipartisan approach, to establish a bold, coherent vision for public education in the 21st century. The vision should ensure an educational system that is engineered for excellence and anchored in the shared expectation that all students will graduate from high school with the knowledge and skills essential for success in college and/or a career, and ready to fully participate in civic life and the global economy. This vision necessitates a new approach to state and district accountability, the centerpiece of federal education policy.

A Decade of Promise But Modest Progress

Today, a growing number of districts have put in place the fundamentals envisioned in the No Child Left Behind Act, and are transforming the learning experience for students. Each Consortium district has built or is building a multi-faceted accountability system that tracks performance against college- and career-ready targets with full disaggregation of data. Results are widely available to students, parents, board members, the state, higher education institutions, and others, and are regularly used to improve our work.

On several important measures, student achievement has begun to trend in the right direction. Incremental improvements are insufficient, however. We must see faster, more significant improvements for a larger number of students, which is the goal of the new accountability framework we envision.

New Systems for a New Era: Vision for 21st Century Accountability

In order for 21st century outcomes to be achieved at scale, every district and school must ensure it has in place highly effective systems of teaching, curriculum, assessment, and support. Multiple sources of data and information must be used as regular practice to gauge the effectiveness of these systems. Lessons learned must lead to ongoing improvements and innovative new approaches.

At the same time, Congress should redefine accountability from a top-down, one-size-fits-all, compliance model to a model that is focused on shared responsibility and trust, and that builds the collective capacity of educators and districts to meet the learning needs of all students. We cannot achieve the student outcomes we want without improving teaching and learning. Likewise, our efforts will fail if we cannot operate within a system that promotes the right behaviors and actions, including meaningful parent and community engagement. Therefore, the Consortium district leaders propose to Congress that future federal education policy be based on the following principles:

Federal law should establish the goal of college- and career-ready (CCR) outcomes for all students. It also should provide guideposts for the quality systems (e.g., assessment, accountability and support, education development) needed to meet those expectations. Such guideposts should be based on research and evidence. Continued investment in research and evaluation is needed to support continuous improvement.

States should develop plans for meeting established CCR goals. These plans should be required to detail the processes states and districts will use for regular evaluation, reflection on results, and mid-course corrections when needed. Continuous improvement processes should be based on research and evidence of what works, including, for example, with regard to instruction, assessments, and interventions designed to meet the needs of student groups—such as students with disabilities, English language learners, and those in dual language settings as appropriate. Federal law should not prescribe the details of these plans, but should focus instead on contributing deep knowledge and expertise, in a collaborative manner, to help states and districts develop the strongest possible plans and processes.

Educators, school and district leaders, community partners, and others must align their work to support common CCR outcomes, with clearly established measures and metrics (test-based and other measures), and targets for performance and continuous improvement.

Federal involvement in local policy and practice should be limited. In most instances, education policy decisions should be left to local district and school leaders. Districts and schools

should earn autonomy by demonstrating prior success, capacity, and community engagement, along with meaningful progress in the implementation of a high-quality plan for ensuring all students graduate college- and career-ready.

Federal law should continue to provide a backstop against chronic underperformance and inequity. Where district and school performance is weak, autonomy should be scaled back and mandatory “guard rails” put in place.

Accountability should drive positive changes in behavior, processes, and culture, while encouraging continuous improvement and innovation. Too often seen as punitive, accountability should instead empower educators. They and other individuals with expertise should be expected to exercise professional judgment in making informed decisions about student placement and promotion, instructional strategies, educator development and intervention, and more.

Improving the effectiveness of educators and systems must involve accountability for multiple parties and require close attention to multiple measures. For example, local boards, district administrators, union leaders, and others must work together to provide effective governance and sound financial management. These structures are essential foundations for professional development, student support services, and high-quality assessments for learning.

Student learning must be measured with higher-quality assessments. Some instruments may be developed and administered on a national scale, while others may be designed or selected locally. Furthermore, determining readiness for college and career demands an accountability system that incorporates much more than summative assessments of just reading and mathematics. Systems must value deep content knowledge in at least English/language arts, math, science, and history, as well as the ability to apply knowledge through skills such as critical thinking, problem solving, and communication. Federal policy must acknowledge this reality and empower districts to develop assessment systems that generate a broad array of information, coupled with professional judgment, which will drive needed improvements in teaching and learning.

Accountability: Recommendations for a New Federal Framework

As Consortium district superintendents, we welcome accountability for the results we achieve. We believe, however, that the existing federal architecture is inadequate to meet the challenges and opportunities we face today. We need a system that supports our work without impeding our efforts to continuously improve through evaluation and innovation. The desired framework would empower districts that have demonstrated the ability to exceed requirements or continuously improve, while keeping in place the federal focus on equity through safeguards such as disaggregation of performance data by subgroups. Greater leeway would be given to districts that are prepared to innovate so that more effective practices can be identified for others to adapt and adopt.

Our vision for the federal role in public education, therefore, is captured in recommendations that address six areas in which we believe federal law and policy can have the most productive influence. We desire a new accountability framework that will:

1. Establish 21st Century Outcomes as the Goal of All Major Education Laws and Policies
2. Require Academic Content Standards and Student Academic Achievement Standards Aligned with College- and Career-Readiness Outcomes
3. Promote the Development and Use of High-Quality Assessment Systems and Other Valid Measures of College- and Career-Readiness

4. Promote Innovation and Continuous Improvement in Schools and Districts
5. Ensure Equitable Access to Effective Educators
5. Promote Transparency, Engagement, and Shared Accountability through Appropriate Reporting of Data and Information

Each area is explored further on the following pages. We thank the Members of Congress who have invited the Consortium to propose a new framework for our nation's education policy. Consortium superintendents look forward to working collaboratively with Congress to bring about positive changes in federal law. These changes should accommodate the needs and incorporate the best thinking of successful districts like ours, and deliver the high-quality public education America's children deserve.

Six Focus Areas for a Proposed New Accountability Framework

1. Establish 21st Century Outcomes as the Goal of All Major Education Laws and Policies

Recommendations. Federal law should:

- A. Establish college- and career-readiness (CCR) as the goal for all students, recognizing that 21st century success requires student mastery of deep content knowledge; ability and fluency in more than one language; the ability to apply that knowledge through higher-order skills; and the possession of essential non-cognitive competencies, such as perseverance, self-regulation, and confidence.
- B. Require each state, as a condition of federal funding, to provide assurance in its Title I plan, Perkins/CTE plan, and other relevant plans, that its districts have adopted CCR expectations that reflect the knowledge and skills needed for 21st century success. Such plans should also detail the support that states and districts need to help all students achieve CCR expectations.
- C. Focus the federal role on conducting research and evaluation in order to expertly advise state and local education agencies (LEAs) on their plans for achieving educational equity and excellence.

2. Require Academic Content Standards and Student Academic Achievement Standards Aligned with College- and Career-Readiness Outcomes

Recommendations. Federal law should:

- A. Require each state to provide assurance, as part of its Title I plan, Perkins/CTE plan, and other relevant plans, and as a condition for federal funding, that:
 - i. The state and its districts have adopted consistent, statewide CCR content and academic achievement standards in at least mathematics, English/language arts, science, and history, designed to lead all students to the knowledge and skills defined by each district;
 - ii. The state's content and achievement standards align with entrance requirements for an institution of higher education in the state without the need for remediation;
 - iii. The state has or will develop early-grades standards for kindergarten through grade 3 that lay a solid foundation for the state's academic content standards for grades 4-12. All such standards should be fully accessible to second language learners and students whose first language is other than English.
- B. Preserve state and local district control over all matters related to curriculum and instruction, as well as academic achievement standards.

- C. Encourage and support states and districts in learning from the successes of the education systems operated by others, both within the United States and internationally, particularly regarding the standards that system leaders have set for student achievement and the policies and practices they have put in place to achieve those standards.

3. Promote the Development and Use of High-Quality Assessment Systems and Other Valid Measures of College- and Career-Readiness

Recommendations. Federal law should:

- A. Establish principles which will result in systems of high-quality assessments that:
 - i. Measure student performance and growth on the full breadth and depth of state CCR content standards;
 - ii. Include common measures that allow for multiple comparisons (e.g. school, district, state);
 - iii. Reduce the testing burden through a smaller number of high-quality summative assessments administered at key transition points (e.g., exiting elementary school, exiting middle school, exiting high school), and/or through tests that use statistically valid sampling techniques (as is done with NAEP, the National Assessment of Educational Progress);
 - iv. Improve instruction and are used in conjunction with other measures (e.g., graduation rate, postsecondary success) to make informed decisions about instructional strategies, distribution of resources, student support services, and more;
 - v. Yield timely, relevant, and actionable information for students, parents, educators, and school leaders; and
 - vi. Go beyond multiple choice (fill-in-the-bubble) tests; measure the full range of cognitive complexity; require students to demonstrate what they know and can do through performance assessments; and enable results to be disaggregated.¹
- B. Require each state to provide assurance in its Title I plan and other relevant plans, and as a condition for federal funding, that it has worked with its local education agencies to put in place a system of high-quality assessments that meet established principles and yields data that are used with other valid measures to determine student readiness.
- C. Allow and encourage innovations that embed assessment in ongoing classroom activities and provide faster, richer results.
- D. Promote the development of state-district partnerships through which individual districts and groups of districts implement high-quality assessments that meet all established criteria. These assessments may vary from those used by other districts, but should include some statewide or nationally administered assessments tied to common expectations. Districts that are ready to move to better systems of assessment (and accountability) should be allowed to serve as zones of innovation working to help others improve their assessments.
- E. Increase the federal investment in states and districts to implement assessments that meet quality CCR criteria and are part of approved state/district plans. Allocate funding specifically for those who commit to develop or adopt higher-quality assessments, and allow states and districts to pool funding for the joint development of assessments.

¹ See the USED ESEA Flexibility definition of High-Quality Assessment and CCSSO's States' Commitment to High Quality Assessments Aligned to College and Career-Readiness. See appendix for full citations.

4. Promote Innovation and Continuous Improvement in Schools and Districts

Recommendations. Federal law should:

- A. Establish principles for the continuous improvement of schools and districts, with particular emphasis on persistently low-performing schools and those with the largest achievement gaps, toward the goal of sustained high performance by all. These principles should be based on research on the attributes of effective schools.² They should include the following:
 - i. Annual determinations of district and school performance based on multiple measures, including student performance and growth on high-quality assessments in at least English/language arts, mathematics, science, and history; other appropriate CCR measures; graduation rate; and indicators of effective governance and financial management;
 - ii. Ambitious but achievable annual performance targets aligned with CCR standards in at least mathematics, English/language arts, science, and history for the state, districts, schools, and all student subgroups;
 - iii. Timely and transparent reporting of performance against targets to parents and the public;
 - iv. A rigorous diagnostic review process agreed to by the SEA and LEA, which includes at least periodic reviews by external experts, to determine the root causes of performance issues, the most appropriate supports and interventions, and the financial resources needed to make improvements;
 - v. Assurance that school resources (e.g., funding, instructional materials, technology and other learning tools, and access to effective educators) will be adequate and allocated equitably based on student need;
 - vi. A process for differentiating school and district performance, accompanied by a system for rewarding high performance and high growth and supporting schools or districts in need of improvement; and
 - vii. A process for differentiating state oversight of districts to allow for earned autonomy for high-achieving districts as well as required adherence to state-defined criteria for district intervention designed to transform persistently low-performing schools and those with large achievement gaps.
- B. Require each state to provide assurance in its Title I plan and other relevant plans, and as a condition for federal funding, that it is implementing a statewide system of differentiated accountability that meets established principles and through which districts bear primary responsibility for the continuous improvement of schools.
- C. Strengthen investments in high-quality research, evaluation, and technical assistance to support capacity-building aligned to CCR goals in state and local education agencies.

5. Ensure Equitable Access to Effective Educators

Recommendations. Federal law should:

- A. Establish principles for enhancing teacher and leader effectiveness that are based on research and evidence of proven policies and practices. These principles should promote systems of educator development and evaluation as part of a comprehensive approach to providing every student and educator with the resources necessary for success. They should include the following:

² See the CCSSO Principles for State Leadership on Next Generation Accountability Systems, and the turnaround principles defined in the ESEA Flexibility paper. See appendix for full citations.

- i. A systemic, context-specific approach to establishing a community of effective educators;
 - ii. Embedded and ongoing professional development, designed with input from educators, that is based on data and evidence about what drives improvement in teaching practice and is focused on building the collective capacity of professional educators;
 - iii. Clear standards and responsibilities for state and district delivery and evaluation of effective professional development;
 - iv. Evaluation systems based on standards of practice proven to lead to effective instruction – specifically, such systems should be based on multiple measures of teacher practices and student outcomes and be used by districts in carrying out regularly scheduled evaluations; a range of data and information should be used by trained evaluators with appropriate expertise to make local judgments on educator performance, and to drive state efforts to improve the quality of teacher preparation programs, licensure processes, professional development, etc.;
 - v. Adequate and equitable resource allocation based on the needs of educators, including funding, technology, and other tools to support effective instruction; and
 - vi. Incentives for the use of effective strategies (e.g., recruitment programs, differentiated compensation, voluntary transfers) to ensure that all students, particularly low-income and minority students, have access to effective educators and are not taught at disproportionately high rates by out-of-field, less-effective, or inexperienced teachers.
- B. Require each state to provide assurance in its Title II plan and other relevant plans, and as a condition for federal funding, that it has established performance criteria for the state and districts designed to support all students in achieving college- and career-readiness.
- C. Ease restrictions on the use of Title II funds to allow for more systemic and innovative approaches to educator development, evaluation, and support as part of a plan for school and district improvement, particularly with regard to efforts to turn around the lowest-performing schools.

6. Promote Transparency, Engagement, and Shared Accountability through Appropriate Reporting of Data and Information

Recommendations. Federal law should:

- A. Require each state to provide assurance in its Title I plan and other similar plans, and as a condition for federal funding, that the state and each district have in place a comprehensive system of timely, transparent, and informative communications, and a plan for helping parents and community members understand and use the information provided. Each plan should address the following:
- i. Communication to parents and the community about CCR standards and expectations;
 - ii. Reports, at least annually, on the performance and growth of each student subgroup, students in each performance quartile, each school, and the district on all statewide and other assessments; state, district, and school graduation rates; students' postsecondary participation in college, career training, or the military; and other CCR measures;

- iii. Communication on the guideposts of high-quality academic performance and system supports;
- iv. Reports on improvements in performance, processes, and system characteristics (e.g., finance) as appropriate; and
- v. Reports, at the state level only, of student performance and growth in teacher preparation programs operated by the state's institutions of higher education.

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The recommendations presented in this document are the product of the collective experiences of Consortium districts. Each of us has put in place systems that comply with and go well beyond the requirements of federal law. In doing so, and in designing systems for the future, we have relied heavily on the work of leading researchers and experts, both within the U.S. and internationally, and on the successes of others. Below are citations to some of the reports and studies that have helped shape our thinking and our practice.

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