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Council of Chief State School Officers

An Introduction to Accountability Implementation:

A Preface to the Operations, Performance Standards, and Evaluation Resources

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS

The Council of Chief State School Officers (CCSSO) is a nonpartisan, nationwide nonprofit organization of public officials who head departments of elementary and secondary education in the states, the District of Columbia, the Department of Defense Education Activity, and five U.S. extra-state jurisdictions. CCSSO provides leadership, advocacy, and technical assistance on major educational issues. The Council seeks member consensus on major educational issues and expresses their views to civic and professional organizations, federal agencies, Congress, and the public.

An Introduction to Accountability Implementation:
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BACKGROUND

The passage of the Every Student Succeeds Act (ESSA) marked the beginning of a new development cycle for accountability systems. State Education Agencies (SEAs) have been presented with an opportunity to revise and redesign accountability systems that have been part of the *Elementary and Secondary Education Act* (ESEA) and its reauthorizations under the *Improving Americas School Act* (IASA), *No Child Left Behind* (NCLB), and *State Flexibility from ESEA* (ESEA Waivers). This opportunity gives SEAs the chance to reinforce the connection between accountability systems and school improvement systems, and the need for ongoing continuous improvement--which is a focus of the accountability principles set forth by states in 2011[1], as well as strengthen the coherence of these systems with an SEA's larger priorities and theories of action.

Beyond school ratings, state accountability systems are somewhat abstract at the school and classroom levels. SEAs tend to leverage accountability systems to incentivize behaviors that improve outcomes for students and facilitate equitable access to high-quality educational opportunities. However, there often exists a gap between the intended system impact and how behaviors change. While a strong system design may improve this system-behavior connection, there are many stages of development along the way to which designers should attend. The following figure visualizes this continuous and connected nature and is described in the evaluation resource referenced later in this paper.

Figure 1. The Accountability and Improvement Cycle

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1   CCSSO (2011). Principles and Processes for State leadership on Next-Generation Accountability Systems.

Accountability and improvement systems are multi-stepped and multi-layered. This creates a series of dependencies that require confidence in the preceding system decisions to support the validity, or the accuracy, of subsequent decisions. Thus, early evidence of the system working as intended (e.g., design decisions, business rules, and school performance expectations) can make it easier to confirm that the SEA has identified Local Education Agencies (LEAs) and schools in greatest need of support and services. This brief provides an overview of why SEAs should consider developing validity arguments (or the process of collecting and interpreting evidence to support decisions) around their accountability and improvement systems and introduces concepts raised in additional papers that support the design, development, and implementation activities states face under ESSA.

VALIDITY ARGUMENTS FOR ACCOUNTABILITY AND IMPROVEMENT SYSTEMS

From a measurement perspective, validity refers to the ability of an instrument to measure what it purports to measure[2]. State accountability systems can be thought of as a measurement instrument that helps the public understand the degree to which schools and districts meet the state's educational goals and priorities[3]. Therefore, establishing a validity argument for accountability is based on identifying and connecting the pieces of evidence that allows SEAs to have confidence that the schools' ratings are accurate, fair, and valid. This in turn allows SEAs (and LEAs depending on the support system design) to appropriately support schools that are struggling and recognize schools that are excelling.

Accountability Systems Stages

Accountability, like any complex system, is based on a series of dependencies. The quality of any one step is contingent on the accuracy of each preceding decision. Documenting these decisions and compiling evidence at each step can help SEAs make a validity argument for the accountability, and eventually, improvement systems. However, SEAs must first recognize the decision points at each step to identify the most relevant evidence for each decision point. Collecting this evidence can help instill confidence in design decisions, system processes, school performance expectations, and the delivery of services and support. Despite these system complexities, there are three general categories that can be applied relatively universally to accountability identification activities: design, development, and implementation. The following figure outlines these three categories specific to accountability system and identification.

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2   See Chapter 1 (Validity) of the *Standards for Educational and Psychological Testing* (AERA, APA & NCME 2014).
3   See the paper, *Where the Rubber Meets the Road: Operations and Quality Control in School Accountability Systems* (Keng & D'Brot, 2018).
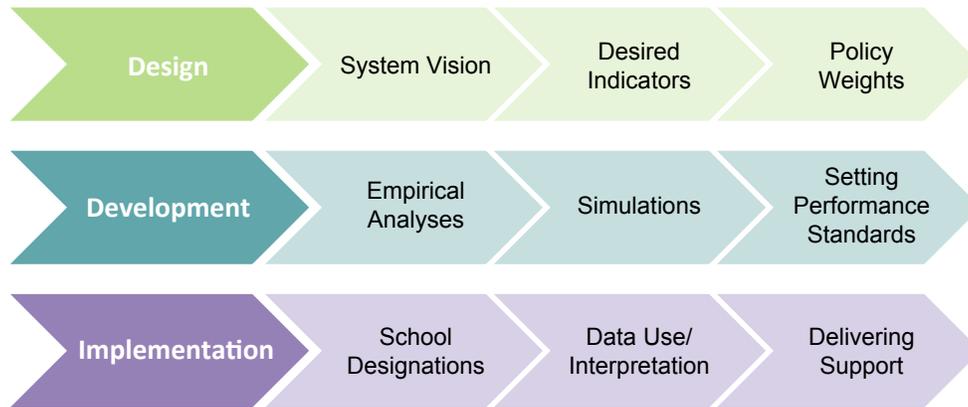
Figure 1. Accountability Design, Development, and Implementation Stages.

The **design** stage typically involves refining the system's overall vision (e.g., policy priorities, educational system goals, role of accountability), specifying indicators based on the intended signals (e.g., growth and achievement, college readiness vs. career readiness, engagement), and defining policy weights that represent SEA values and priorities (e.g., growth = achievement).

The **development** stage includes evaluating indicator measures and relationships among indicators through analysis (e.g., descriptive and inferential analyses, qualitative reviews of data and processes), identifying potential data gaps or capacity concerns through the use of simulations (e.g., projections, historical data examinations, mock accountability runs), and specifying performance expectations over time by setting defensible performance standards.

The **implementation** stage includes supporting the determination and release of school designations, helping people access, use, and interpret accountability data, and helping the SEA and LEAs deliver support to schools. These activities help inform local inquiries and information use.

School Improvement Systems Stages

The accountability system stages together connect to the next set of activities that focus on statewide systems of support and the conditions to facilitate improvement activities. These activities are presented in the following figure focusing on the delivery of support services based on identification decisions.
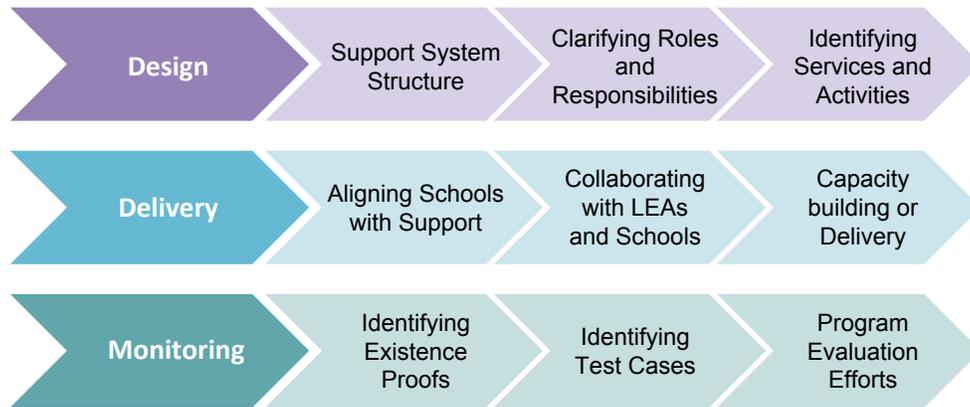
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Design	Support System Structure	Clarifying Roles and Responsibilities	Identifying Services and Activities
Delivery	Aligning Schools with Support	Collaborating with LEAs and Schools	Capacity building or Delivery
Monitoring	Identifying Existence Proofs	Identifying Test Cases	Program Evaluation Efforts

Figure 2. Support System Design, Delivery, and Monitoring Stages.

When compared to the previous figure, Figure 2 shows some similarity in structure, but the specific content differs significantly. An SEA's system of support is predominantly delivery-focused while the accountability system is more identification-focused.

The **design** stage may include framing the structure of the support system (e.g., information and decision flow within and outside the SEA), clarifying roles and responsibilities (e.g., identifying key SEA capacity builders, determining the role of the LEA, identifying typical school-level contacts), and identifying services and activities (e.g., determining school improvement vision or high-yield evidence-based strategies).

The **delivery** stage includes aligning schools with support based on state and federal designations as appropriate, collaborating with LEAs and schools as specified by the system of support design, and engaging in capacity building or service delivery efforts with LEAs or schools. Through the delivery activities, SEAs can begin compiling progress data and behavior profiles to support efforts in the monitoring stage.

The **monitoring** stage can include identifying cases where schools have successfully implemented strategies in the past (i.e., existence proofs), identifying current schools in need of support that can be used to track the impact of services and support, and leveraging program evaluation methods to monitor how services improve progress and outcome data. These activities help bolster validity arguments associated with identification decisions local inquiries and information use. These activities are described in detail in CCSSO's *State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results*[4] paper.

While the emphasis of this paper (and the supporting resources described shortly) is on the accountability system's role in identifying schools, it is critical to understand the complementary roles that accountability and improvement play. The supports and progress monitoring associated with an SEA's support system should be used to understand whether the

4   D'Brot, J., Lyons, S., & Landl, E. (2017). State systems of identification and support under ESSA: Evaluating identification methods and results in an accountability system. Washington, DC: Council of Chief State School Officers

identification system is sending the right signals, prompting effective questioning, and eliciting the intended behaviors among LEAs and schools. The information gleaned from the support and monitoring that states and their partners deliver can then be used to confirm identification decisions or refine the system's design.

This paper seeks to highlight critical areas where states are poised to examine practice and collect evidence to support the development of an overall validity argument for their accountability systems. The remainder of this document describes resources that were developed as part of the *State Plan Implementation Meeting* convened by the Council of Chief State School Officers (CCSSO).

ADDITIONAL RESOURCES

In April 2018, CCSSO invited accountability and school improvement personnel from SEAs to participate in the *State Plan Implementation Meeting*. The following resources and tools were developed for the accountability portion of the meeting and address:

1. Operations and Quality Control in School Accountability[5]

2. Setting Performance Standards for School Performance in Accountability Systems[6]

3. Monitoring and Evaluating Accountability Systems and School Identification[7]

4. Modeling System Decisions, Long-term Goals (LTG), and Measures of Interim Progress (MIP)[8].

Resources 3 and 4 will continue to be expanded, and revised editions will be made available online as they are updated. Additionally, item 4 is not a paper, but rather an Excel-based tool that supplements items 1-3. The tool, *Modeling System Decisions, LTGs, and MIPs,* is designed to help states test various weightings, decision rules, and data-based projections for proficiency and graduation rates to examine the appropriateness and impact of design decisions.

The following sub-sections provide a brief introduction on the concepts raised in each paper (items 1-3) and are described in greater detail within each resource.

Operations and Quality Control in School Accountability

SEAs have invested much time, effort, and resources into designing their accountability systems so that they reflect the state's vision and priorities and meet the requirements in ESSA. This

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5   Keng, L. & D'Brot, J. (2018). Where the rubber meets the road: Operations and quality control in school accountability systems. Washington, DC: Council of Chief State School Officers

6   Domaleski, C., D'Brot, J., Keng, L., Keglovits, R., & Neal, A. (2018). Establishing performance standards for school accountability systems. Washington, DC: Council of Chief State School Officers.

7   D'Brot, J. & Keng, L. (2018). Accountability identification is only the beginning: Monitoring and evaluating accountability results and implementation. Washington, DC: Council of Chief State School Officers.

8   "ESSA Accountability Modeling Tool – Summative Ratings Version" and "ESSA Accountability Modeling Tool – No Summative Ratings Version".

is, however, only the start. To successfully meet the vision, priorities, and goals of the state, accountability systems require an effective operational implementation plan. Much like in the design stage, implementation requires thoughtful consideration and planning so that the system's annual outcomes reflect its intended design. And, as with the design stage, most states have a short amount of time to get their systems up and running. This means that operational infrastructures, such as data and reporting systems, processes, business rules, and validation procedures, need to be in place soon.

In support of the state's validity argument for accountability, its implementation plan should reflect the design of the accountability system with fidelity. This means that the scores and ratings for schools and districts are correctly computed, schools and districts in need of support are appropriately identified, and that the claims made about schools and districts by the system are accurate. This paper outlines practical guidelines and considerations for meeting these goals. It describes a framework that states can use to guide the development of their accountability implementation plan and put guardrails in place to validate the various outcomes of the accountability systems.

The framework divides the operational implementation workflow into three main stages: input, processing, and output. Each stage includes components such as data files, data systems, business rules, reported data and reporting system. The full paper explicates the framework by first stating the high-level objective for each component and then elaborating on the specifics by asking guiding questions about the "five W's" (what, who, when, where and why) from the state's organizational structure and processes. The objectives and guiding questions in the framework are important to consider not only in the initial planning and implementation of the state's accountability system, but also for the ongoing monitoring, evaluation, and continuous improvement of the system. The paper concludes with recommendations for best practices to help mitigate or minimize threats to quality in accountability implementation.

Setting Performance Standards for School Performance in Accountability Systems

The outcome of central interest to most stakeholders on an accountability system is the overall rating or classification that is produced for each school. These ratings are often used to identify schools that merit reward or require support and to evaluate the efficacy of educational programs and policies. States vary in their approach to producing school ratings. In some states, the accountability system culminates in a state-specific classification such as an A-F letter grade, awarding one to five stars, or other designations for communicating performance to the public. Other states do not provide an overall rating apart from the ESSA required categories of Targeted Supports and Improvement (TSI) and Comprehensive Supports and Improvement (CSI). Whether or not an overall or composite rating is provided, many states communicate performance using report cards or "dashboards" that often describe indicator level performance in terms thresholds (e.g., high/low; met expectations/ did not meet expectations, etc.)

Given the central importance of the culminating accountability rating at the indicator or overall level, it is only reasonable to require compelling evidence that the rating has a high degree of validity for the intended interpretation and uses. A substantial part of that validity argument is the design and implementation of a sound process for establishing performance standards that credibly reflects the state's vision for the accountability system. The purpose of this paper is to outline recommended principles to guide the establishment of a standard-setting process for accountability systems and to describe a framework for implementing standard setting. Both the principles and framework are based on concepts, approaches, and considerations from establishing performance standards in assessment systems. The full paper provides detailed descriptions with specific examples to help make the principles more concrete and steps in the standard setting framework more practical for implementation. The paper also presents two case studies to help illustrate promising state practices.

Monitoring and Evaluating Accountability Systems and School Identification

The correct identification of schools is a necessary but insufficient condition for building capacity and delivering support to local systems. Systems of accountability, support, and continuous improvement contain a series of feedback loops and information hand-offs that offer opportunities to collect evidence on whether the systems are working as intended. By identifying activities and their relevant evidence throughout the design, development, and implementation of accountability systems, we can begin to develop validity arguments for our accountability and improvement systems. This paper presents a framework that can support a systematic examination of the design, development, and implementation stages of accountability identification. This framework can be applied to the activities associated with each stage presented in Figure 1.

Within each of these stages and activities, SEAs can widen or narrow what they monitor to expand or limit system claims. Claims are statements or assertions about the accountability system and its impact and will likely differ in granularity depending on the level of focus. By developing a set of claims associated with accountability and improvement systems, SEAs can begin developing a logic model that identifies the assumptions, questions, data considerations, and possible evaluation approaches to help establish a *validity argument* for their accountability and improvement systems. However, the validity of the full system rests on the confidence that states have in the validity of each activity, as well as each preceding step or stages along the way.

The full paper describes a framework to help states systematically evaluate identification decisions. It first presents example claims associated with each activity shown in Figure 1 (e.g., system vision, indicator selection, performance standards). For each claim, a series of guiding questions are then provided to help SEAs clarify the intended purpose, use, and process associated with each claim to determine what assumptions must be upheld. These assumptions are then used to help practitioners and designers identify sources of information, methods, or analyses that can be used to collect information to defend each claim. The framework is not intended to be prescriptive, but rather to provide examples of how states can apply this framework to begin establishing validity arguments for their accountability systems.

CONCLUSION

This brief presents a high-level conceptualization of how accountability and improvement systems are intended to work together and why SEAs should consider developing a validity argument for their accountability and improvement systems. Additionally, it describes three key areas of accountability implementation that states are primed to leverage for sources of evidence and information to support their system validity arguments. These areas include operations and quality control, setting performance expectations for schools, and establishing plans for monitoring and evaluating their accountability systems. While the full resources go into greater detail for each topic, we hope this resource describes the importance of these activities and how they can lead to defensible identification systems that inform—and are informed by—statewide systems of support.

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