



AUGENBLICK,
PALAICH AND
ASSOCIATES

Local Accountability System Grant Year 1 Evaluation

By Robert Reichardt, Jennifer Kramer-Wine, Charles Menke

APA Consulting

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Executive Summary

This evaluation by Augenblick, Palaich and Associates, Inc. (APA) is the first outside evaluation of the Colorado Local Accountability System Grant (LASG) program. This evaluation of the LASG is required by the authorizing legislation (SB-19-204¹). *It is important to note that this is not an evaluation of any individual grantee or Accountability Partner*, rather this is the first of two evaluations and mainly uses qualitative information to support the evaluation. The second evaluation will use more quantitative data.

LASG provides grant funds to enhance local accountability and continuous improvement systems². Schools and districts participating in the LASG are also part of the statewide accountability system. LASG local accountability system is supplemental to the state accountability system and may be designed to:

- a) Fairly and accurately evaluate student success using multiple measures to develop a more comprehensive understanding of each student's success, including additional performance indicators or measures, which may include non-academic student outcomes such as student engagement, attitudes, and dispositions toward learning;
- b) Evaluate the capacity of the public school systems operated by the local education provider to support student success; and
- c) Use the results obtained from measuring student success and system support for student success as part of a cycle of continuous improvement (22-11-703)³.

Grants were awarded in March 2020 by the Colorado Department of Education (CDE) through a competitive process to 11 of the 14 applicants. Grant amounts range from \$25,000 to \$75,000 per year for a statewide grant total of \$450,000 per year. The grants are intended to last for three years; however, grants were suspended soon after they were awarded for a year due to pandemic-caused disruptions. Currently 10 grantees participate in the LASG.

Grantees are engaging in a wide variety of initiatives, including public reporting dashboards, site visit protocols and rubrics, development of nonacademic indicators, stakeholder engagement processes and alternative approaches to improvement planning. All grantees have worked on defining their values, articulating their underlying structure, and defining a theory of action.

Grantees come from a wide range of contexts including small rural districts, large urban districts, as well as a consortia of alternative education campuses (AECs) as part of the Measuring Opportunity Pilot Project (MOPP)⁴. While much of resources and attention from the state accountability system focus on

¹ The bill text can be found here: <https://leg.colorado.gov/bills/sb19-204>

² Information about the grant can be found here: <https://www.cde.state.co.us/localaccountabilitysystemgrant>

³ This language was taken from a CDE LASG fact sheet, located at: <https://www.cde.state.co.us/accountability/localaccountabilitysystemgrantflier>

⁴ More information about AEC accountability in Colorado can be found here: [Alternative Education Campus Accountability | CDE \(state.co.us\)](#)

lower rated schools and districts, i.e. schools and districts identified Priority Improvement or Turnaround, LASG grantees generally higher rated on the state accountability system.

An important feature of the LASG grant is the option to work with Accountability System Partners that provide expertise in developing measures, helping to design infrastructure, and to support data interpretation. CDE’s role in the grant included helping to administer the grant, supporting on-going improvement planning that complies with federal, state, and grant requirements, facilitating convenings of grantees to support networking, planning and capacity building. CDE staff has also provided technical assistance to grantees upon request.

The goal of this evaluation is to support learning about innovative practices by LASG grantees and exploring their generalizability to the rest of the state. The evaluation uses multiple sources of data including a literature summary, review of existing documentation about the grants and grantees, a survey of grantees and their Accountability Partners, and interviews with five selected sites and their Accountability Partners. The interview sites were selected by APA in consultation with CDE to represent the wide variety of successful grant activities in varying contexts.

A brief summary of literature related to this evaluation is provided to identify the key components of accountability and continuous improvement systems. The critical elements in accountability and continuous improvement systems and their relationships are summarized Figure 1 below.

Figure ES1: Critical Elements in Accountability and Continuous Improvement Systems



This representation of accountability and continuous improvement systems has several important elements. First, these elements are shown within a **cycle of improvement**, that is these systems operate in cycles of improvement, not as one-time events. Second, **information within the cycle flows bi-**

directionally. For example, efforts to identify measures can influence goals as can efforts at change. Finally, this system operates in a **context of community engagement** that can occur throughout the entire cycle. Community engagement does not occur at any one time within accountability and continuous improvement systems, but throughout the system.

The LASG participant survey respondents agreed that they have either met or are making progress to grant goals. Eight of nine grant activities were rated as a success, with the only activity not being a success was “Capacity to engage the public.” Challenges were most often associated with data: capacity to make data informed decisions and data infrastructure e.g., data dashboards, data storage and data cleaning. Finally, supports from CDE were described as helpful. For example, program participants said the posting of their alternative reports and plans on the CDE website helped increase the credibility of their work on alternative accountability systems.

The largest challenge the LASG sustainability identified by grantees is on-going leadership buy-in. Particularly challenging is turnover of local school boards and district superintendents which can lead to changes in priorities and goals. Often the work associated with the LASG involve district leadership. This work was described as valuable but time consuming. New leadership priorities can lead to different leadership focus and use of leadership time.

This evaluation has found the LASG program to be a success. It has helped schools and districts develop local accountability and improvement systems. Through this work, new valid and reliable measures of local goals and processes have been developed or identified for use in local accountability systems. While grantees work to address perceived shortfalls of the current system with their locally developed system, this does not mean that they do not see value in the state system. For example, the LASG has built capacity to better implement the state’s current accountability system for AECs, by building capacity within AECs to better identify accountability measures aligned with the individual school goals.

A key question is what lessons or measures or tools developed through the LASG can be disseminated or used by other districts. CDE staff have already used sessions at the Colorado Association of School Executives (CASE) conference to increase district leader knowledge of LASG activities. The measures developed by LASG grantees, including peer review processes, could be valuable to other districts. However, the value comes from the measures and processes supporting locally developed goals. Without the connection between measures, processes and local goals, as well as leadership buy-in and community engagement, the measures and processes developed by LASG grantees are not valuable to other districts. And it is important to note that many of the locally developed measures are regularly updated and changed as challenges with the measure are identified and as goals and needs of LASG grantees evolve. To support the dissemination and use of goals, the state could further engage in discrimination of the measures. This could include the development of materials that clearly describe the goals and outcomes that are measured, the evidence of validity and reliability, and the resources needed to build the capacity to use the new measures.

The LASG grantees **value the ability to link their accountability plans within the state's website**. Having the local system recognized by the state provides value and credibility to local efforts. This capacity to link the local and state accountability and improvement efforts should be expanded to make it easier for local accountability reports to be shared along with state SPF and DPF reports.

A challenge identified with the current state system by local grantees is that **privacy concerns** override district staff's ability to access all state accountability data for smaller districts and schools. Current public SPF and DPF reports do not report personally identifiable information (PII) such as achievement and growth scores. Private reports are available to district staff, but knowledge of the availability of and how to access these newer private reports is a challenge. Making it easier for small districts to access and use complete state accountability measures about the students within the districts will address this challenge identified by interviewees.

The **Accountability Partners have provided valuable capacity to local districts** as they do this work. Partners serve as technical experts supporting many grant activities including development of theories of action, development and validation of measures and serving as thought partners to grantees. The use of external partnerships to help build capacity in schools in districts is a powerful policy tool and appears to be one way the state can help local districts build capacity.

Introduction

This evaluation by Augenblick, Palaich and Associates, Inc. (APA) is the first outside evaluation of the Colorado Local Accountability System Grant (LASG) program. Authorized by the Colorado State Legislature in Senate Bill (SB) 19-204⁵, the LASG provides grant funds to enhance local accountability and continuous improvement systems⁶. This section begins with a description of the LASG followed by a short description of the evaluation. The following sections provide the results of the evaluation, including a brief literature summary on accountability and continuous improvement, results of a short survey of grant participants, and findings from in-depth studies of five selected grant participants.

LASG Overview

As described in Colorado Department of Education (CDE) publications, the LASG local accountability system is supplemental to the state accountability system and may be designed to:

- d) Fairly and accurately evaluate student success using multiple measures to develop a more comprehensive understanding of each student's success, including additional performance indicators or measures, which may include non-academic student outcomes such as student engagement, attitudes, and dispositions toward learning;
- e) Evaluate the capacity of the public school systems operated by the local education provider to support student success; and
- f) Use the results obtained from measuring student success and system support for student success as part of a cycle of continuous improvement (22-11-703)⁷.

Grants were awarded in March 2020 by CDE through a competitive process to 11 of the 14 applicants. Grant amounts range from \$25,000 to \$75,000 per year for a statewide grant total of \$450,000 per year. The grants are intended to last for three years; however, grants were suspended soon after they were awarded for a year due to pandemic-caused disruptions. Currently 10 grantees participate in the LASG.

As described by CDE, grantees are engaging in a wide variety of initiatives, including public reporting dashboards, site visit protocols and rubrics, development of nonacademic indicators, stakeholder engagement processes and alternative approaches to improvement planning. All grantees have worked on defining their values, articulating their underlying structure, and defining a theory of action. Grant awardees include individual districts as well as consortia of participating districts:

- Boulder Valley School District, RE-2, Canon City School District, Greeley-Evans School District 6 and Gunnison Watershed School District
- Delta County 50J – Vision Charter Academy
- Student-Centered Accountability Project (S-CAP), including Buena Vista R-31, AkronR-1, Buffalo RE-4J, East Otero R-1, Frenchman RE-3, Hanover 28, Haxtun RE2-J, Holyoke Re-1J, Kit Carson R-1, La Veta Re-2, Las Animas RE-1, Monte Vista C-8, West Grand 1-JT, and Wiggins RE-50(J)

⁵ The bill text can be found here: <https://leg.colorado.gov/bills/sb19-204>

⁶ Information about the grant can be found here: <https://www.cde.state.co.us/localaccountabilitysystemgrant>

⁷ This language was taken from a CDE LASG fact sheet, located at:

<https://www.cde.state.co.us/accountability/localaccountabilitysystemgrantflier>

- Denver Public Schools
- District 49 (Falcon)
- Fountain-Fort Caron School District 8
- Garfield County School District 16 (withdrew due to constraints created by the pandemic)
- Measuring Opportunity Pilot Project (MOPP), including New America School – Lakewood (Jefferson County), Brady Exploration School (Jefferson County), Denver Justice High School (Denver), Durango Big Picture School (Durango), HOPE Online High School (Douglas County), Jefferson High School (Greeley), New America School – Aurora (Charter School Institute), New America School – Thornton (Adams 12), Southwest Open School (Cortez), Rise Up Community School (Denver) and Yampah Mountain High School (Glenwood Springs)
- Jefferson County Public School District
- Northeast Colorado BOCES, including Plateau School District RE-5, Revere School District, Yuma School District 1, Lone Star 101, and Haxtun Re-2J
- Westminster Public Schools and Brush School District RE-2J⁸

While much of resources and attention from the state accountability system focus on lower rated schools and districts, i.e., schools and districts identified Priority Improvement or Turnaround, LASG grantees generally higher rated on the state accountability system. Grantees provided videos describing their work, which are available at this link: <http://www.cde.state.co.us/localaccountabilitysystemgrant>.

Grantees come from a wide range of contexts including small rural districts, large urban districts, as well as a consortia of alternative education campuses (AECs) as part of the Measuring Opportunity Pilot Project (MOPP)⁹. AECs have specialized missions and serve high-risk student populations including students experiencing homelessness, addiction, are in foster care, and/or are pregnant or parenting. Since 2002, the state has been working to support high quality settings for these vulnerable and challenging populations. AECs are able to select optional measures for their accountability and improvement planning in addition to state measures.

An important feature of the LASG grant is the option to work with Accountability System Partners that provide expertise in developing measures, helping to design infrastructure, and to support data interpretation. These partners include Northwest Evaluation Association (NWEA), University of Colorado (CU) Boulder, CU Denver, Marzano Academies, Momentum Strategy and Research, Generation Schools, Battelle for Kids, WestEd, and Cognition¹⁰.

CDE's role in the grant included helping to administer the grant, supporting on-going improvement planning that complies with federal, state and grant requirements, facilitating convenings of grantees to support networking, planning and capacity building. CDE staff has also provided technical assistance to

⁸ The language describing grantee activities as well as list of grantees was taken from: <https://www.cde.state.co.us/accountability/localaccountabilitysystemgrantflier>

⁹ More information about AEC accountability in Colorado can be found here: [Alternative Education Campus Accountability | CDE \(state.co.us\)](https://www.cde.state.co.us/alternative-education-campus-accountability)

¹⁰ From the Year 2 Legislative Report at: <https://www.cde.state.co.us/localaccountabilitysystemgrant>

grantees upon request. Technical assistance topics have included measurement development, reporting and visualization, and stakeholder engagement.

Colorado's Current Accountability System

Schools and districts participating in the LASG are also part of the statewide accountability system. It is important to understand at a high level components of Colorado's current school and district accountability system to understand the work of LASG grantees¹¹. The Colorado accountability has four important components: goals for student outcomes, measures of student outcomes with cut-points that indicate whether students have met the goals, and processes for identifying challenges and making plans to respond to those identified challenges, and public engagement processes.

Many people engage with the Colorado school and district accountability system through the school and district performance reports (SPF and DPF respectively). They report on student outcomes and use that information to rate schools and districts. The accountability system rates districts and school based on three different key performance measures: **student achievement** on statewide assessments, **student growth** on statewide assessments, and for secondary students, **post-secondary and workforce readiness** based on statewide assessments and other measures. The state develops cut-points that award a different number of points for the ratings based on average or in some cases median performance of students on these different measures. These cut-points apply to all schools serving the same grade levels. However, alternative education campuses may use different measures and cut-points than traditional schools. In recent years, parents have been able to opt their students out of participating in statewide assessments, which has reduced the amount of assessment data available.

Within each measure points are awarded for the performance of all students and for the performance of multiple sub-groups of students including English Learners, free and reduced lunch price eligible students (a measure of poverty), minority students, and students with disabilities. The law that establishes federal expectations for state accountability systems requires the use sub-group performance as part of the accountability system in order to reveal and focus attention on underperformance of disadvantaged groups that could otherwise be hidden in aggregate measures. However, this also means that students can be counted in multiple measures. For example, the test scores and growth of a low income, Latino student who is an English learner would be reported in four measures: all students, students who qualify for free and reduced lunch, English learner students, and minority students.

It is important to note that the Colorado school and district accountability system is a form of extrinsic motivation. Extrinsic motivation refers to the phenomenon when an action is performed in accordance with outside rewards or to avoid punishment. Intrinsic motivation refers to the phenomenon when an action is performed for its own sake as well as for personal rewards. In educational settings, these two

¹¹ This is a high level description of Colorado's district and school accountability system. Additional details are available at: <https://www.cde.state.co.us/Accountability>

phenomena are very useful thinking about incentives for school administrators, teachers, and communities when instituting incentives (Alamri, et al., 2021; Jang, 2019; Trinidad, 2023).

In order to protect the privacy of students, the state does not report on groups of students smaller than 20 or 16 students, depending on the measure. However, this privacy rule means the DPF and SPF for many smaller districts and schools have a significant number of measures that have missing data. As an effort to report more information, CDE uses three-year averages to increase the number of students associated with a measured which increases the number of measures that are reported.

The state has developed a unified improvement planning (UIP) process for using the data contained in the SPF and DPF to identify areas where student performance is below expectations and to identify changes to systems and process to address the identified student performance challenges. The UIP combines multiple state, federal, and grant required planning processes into one planning process. The state has also developed a set of sanctions and supports to help the lowest rated schools and districts to improve student outcomes.

The state's accountability system includes a requirement for community engagement through school and district accountability committees (SAC and DAC respectively) and the local school board. Through each group, staff and community members are required to review the data contained in the SPF or DPF and discuss strategies identified in the UIP to address student performance challenges. The data from the DPF and district UIP is often also presented to local school boards as part of the community engagement process as well.

Taken together the state's accountability system has several important components. It has statewide expectations for student achievement, growth, and post-secondary and career readiness. These expectations are operationalized through measures of student performance and cut-points that are applied to this performance data. This data is provided to schools and districts using SPF and DPF reports. The accountability system has mechanisms to provide sanctions and supports to low performing schools and districts, and it has a system for planning and responding to student performance challenges for all schools and districts through the UIP process. Finally, it has a community engagement process through the work of DACs, SACs, and local school boards.

Outside Evaluation of the LASG

This evaluation of the LASG is required by the authorizing legislation (SB-19-204). *It is important to note that this is not an evaluation of any individual grantee or Accountability Partner, rather this is the first of two evaluations and mainly uses qualitative information to support the evaluation. The second evaluation will use more quantitative data.*

The goal of this evaluation is to support learning about innovative practices by LASG grantees and exploring their generalizability to the rest of the state. The evaluation was designed to address the following questions:

1. How do successful grantees design and implement effective continuous improvement systems as part of their accountability systems?
2. What are the successes, challenges, and lessons learned, and what are the contextual factors at each site that may have contributed to those successes and challenges?
3. What measures do these accountability systems use and how?
 - a. Are there leading indicators of success that grantees have observed or identified when implementing their local accountability measures?
 - b. What is the perceived reliability and validity of these measures?

The evaluation uses multiple sources of data to address these questions. This includes a literature summary, review of existing documentation about the grants and grantees, a survey of grantees and their Accountability Partners, and interviews with five selected sites and their Accountability Partners. The interview sites were selected by APA in consultation with CDE to represent the wide variety of successful grant activities in varying contexts.

This evaluation is part of multiple efforts to learn from the LASG grant activities. CDE has produced two legislative reports that both describe the grant program as well as observations by CDE staff¹². CDE and grantees have also collaboratively presented at Colorado Association of School Executives (CASE). In addition, the CU Denver Center for Practice Engaged Education Research (C-PEER) has also engaged in study of the grantees including mapping of each of the grantee's theories of action.

¹² Information is available here: <https://www.cde.state.co.us/localaccountabilitysystemgrant>

Literature Summary

A brief summary of literature related to this evaluation is provided here. The complete summary is in Appendix A. This summary is intended to identify the key components of accountability and continuous improvement systems.

Accountability has deep roots in American public education history (Loeb & Byun, 2019; Spring, 2016). Since the common school movement in the late 1800's school leaders gathered information to help the public and policymakers make decisions about how well schools are educating students.

Since 2000, and especially with the passage of the No Child Left Behind Act in 2001, most school and district accountability systems follow the administrative model within which districts and schools are rated based on student outcomes, and these ratings are used help to target resources (Loeb & Byun, 2019). In a framework described by O'Day (2002), the theory of action for an accountability system rests on the perspective that the most effective system improvements that lead to increased student achievement happen in the classroom. The framework has four components:

1. Generate and focus **attention** on information relevant to teaching and learning.
2. **Motivate** educators (and others) to attend to relevant information and expend effort to augment or change strategies in response to this information.
3. Develop the **knowledge** and skills to promote a valid interpretation of the information (at both the individual and system levels).
4. Allocate **resources** where they are most needed (O'Day, 2002).

As accountability systems began to work on a faster cycle than the yearly cycle of original accountability systems, the language to describe them changed from accountability to continuous improvement systems. The shift reflects more accurately how states and districts focused their attention and resources, similar to how O'Day discussed (2002). Grunow et al. (2018) created a general definition of continuous improvement "as the ongoing disciplined efforts of everyone in the system to make evidence-based changes that will lead to better outcomes, system performance, and organizational learning" (p. 3). The researchers further explain:

Continuous improvement approaches engage the workforce to identify and improve the critical causes of problematic outcomes, which necessarily lie upstream from the end-of-the-line outcomes of accountability systems. (p. 10)

A guiding principle for a continuous improvement system is improvement science. Improvement science is rooted in the scientific method in that small experiments are created to gather information about a problem of practice¹³ (Fixsen et al., 2015; Hannan et al., 2015).

¹³Industries beyond public education use improvement science. See, for example, manufacturing's Six Sigma methods (<https://asq.org/quality-resources/six-sigma>) and healthcare's movement toward more equitable care

In sum, in a continuous improvement setting, small groups work with data consistently to understand the changes that need to happen to reach the desired outcomes within the system. In addition, the literature summary revealed key differences between accountability and continuous improvement systems, including:

1. Continuous improvement is a system created within an organization, while accountability can be imposed from outside,
2. A locally generated continuous improvement system can be more flexible in the measures used, change those measures, make them match local goals, use more leading indicators, and measures that are maybe not as reliable since the stakes are not as high.
3. The cycle for continuous improvement is often more rapid than yearly accountability.

Critical Elements of Accountability and Continuous Improvement Systems

Within accountability and continuous improvement systems, several critical elements are evident, including stakeholder engagement, clear goals or desired outcomes, measures progress towards those outcomes, and changes within the system or processes to move towards meeting those goals. In either an accountability system or a continuous improvement system, these critical elements combine to form a theory of action: if stakeholders identify a set of desired outcomes, measure them, and use that data to change systems or processes, then student outcomes will improve.

Community Engagement

Community engagement gathers information about what is needed in classrooms and schools to help students reach the community's expectations. The community encompasses people invested in the school system, from parents choosing schools for their students to elected officials who set standards and decide school funding levels. A few questions that the community considers as accountability systems are developed include:

- What improvements need to be made within the system?
- What data are collected by the system?
- Are the data collected aligned with the improvements?
- To what extent are the data collected available to those who need it? (Gill et al., 2014; Grunow et al., 2018; O'Keefe et al., 2019)

At the classroom level, community engagement with teachers honors one element of continuous improvement, which is to understand what is needed where students are learning: within classrooms. To develop systems, the community identifies a set of desired outcomes discussed in the next section.

(Kenney, C. (2008). *The best practice: How the new quality movement is transforming medicine*. New York, NY: Public Affairs).

Goals

As community members consider what improvements need to be made within the system, they identify goals for the students served by the system. Goals for students are generally long-term and reflect if students are ready for postsecondary success (aka, readiness¹⁴). Also, many outcomes are in the state standards, developed within education departments, and sometimes informed by statute. Often national experts develop these standards, such as the work to develop the Common Core State Standards from 2008-2012.

Measures and Assessments

Once desired goals are identified, when appropriate, measures are used to track progress toward reaching the outcomes. Since the passage of the No Child Left Behind Act in 2001, states and districts have used assessments to measure the extent to which students are proficient in core subjects. At first, proficiency was simply used as a measure. Then more sophisticated analyses were conducted to measure growth. As the use of assessments became normalized across the country, assessment data became more and more high stakes.

A way to think about the objective of the use of assessments within an accountability system is to consider an analogy offered by a former Long Beach Public Schools Superintendent Carl Cohn, "we should think about refining the design and uses of assessment to be more like the medical field: looking for the right dose, the right time, for the right patient¹⁵". Therefore, when identifying measures, several questions should be asked about the characteristics of measurement systems, such as whether or not the assessment is:

- reliable (does it provide consistent information?),
- valid (does it measure what it was designed to measure?), or
- comprehensive (does it cover all standards?) (Gill et al., 2014; Loeb & Byun, 2019; Moon et al., 2020; Murphy, 2017; Polikoff et al., 2020; Ravitch et al., 2022).

Ultimately, "the test of whether the usefulness of the measures outweighs their imperfections is whether they appear to improve educational opportunities for students and lead to better decisions" (Loeb & Byun, 2019, p. 101). Questions about assessments branch into types needed to measure a system and how to assess standards. As states and districts grappled with these assessment questions, some moved to measuring student growth on the assessments.

Changes in Systems and Processes to Meet Goals

Changes to systems and processes within the public education system as part of accountability and continuous improvement are multi-layered. They can range from focusing on classroom interactions to how state leaders interact district leaders. As highlighted in the O'Day framework, these changes often

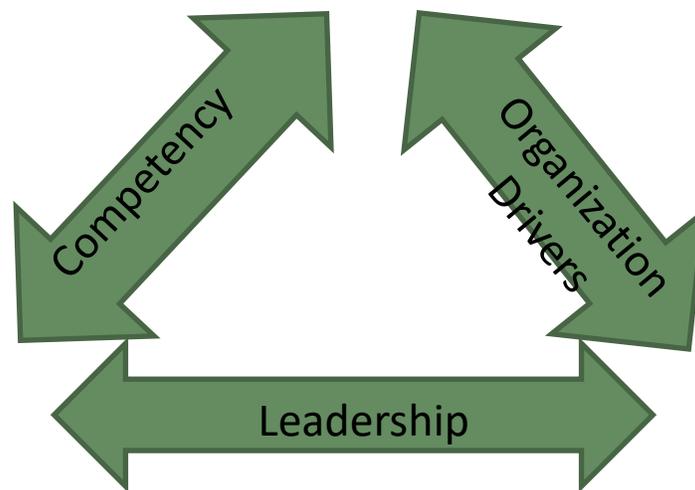
¹⁴ Readiness can be defined as prepared for college, a career, or the military. Some systems define readiness in terms of being prepared for civic engagement. Goals such as increased graduation rates, improved performance on nationally normed standardized assessments, or other meaningful goals are set.

¹⁵ "Forum: Do Policymakers Use Educational Assessment?," 2019

include resource reallocation. Nevertheless, all discussions about system and process change center on the essential question: how do we achieve desired outcomes?

One way to think about system and process changes in relation to accountability or continuous improvement system is to identify the implementation drivers. Implementation drivers were identified by researchers at the National Implementation Research Network (NIRN) as common practices among successfully implemented practices and programs, as illustrated in Figure 1. The three drivers are Competency, Organization, and Leadership supports.

Figure 1: Implementation Drivers



Source: Adapted from Fixsen et al. (2005)

Improved outcomes for students often require a change in practice, and **competency drivers** are how new practices, skills, and knowledge are taught to selected staff through training and coaching. **Organizational supports** create a hospitable environment of innovation and change. This includes information systems for monitoring progress, processes, and resources or materials necessary to carry out new programs. **Leadership** helps surface and resolve problems, sets priorities, and manages the change processes. The Implementation Drivers tool can provide a framework for assessing the availability of the critical elements of effective accountability and continuous improvement systems (Fixsen et al., 2015).

System Model

The critical elements in accountability and continuous improvement systems and their relationships are summarized Figure 1 below.

Figure 2: Critical Elements in Accountability and Continuous Improvement Systems



This representation of accountability and continuous improvement systems has several important elements. First, these elements are shown within a **cycle of improvement**, that is these systems operate in cycles of improvement, not as one-time events. Second, **information within the cycle flows bi-directionally**. For example, efforts to identify measures can influence goals as can efforts at change. Finally, this system operates in a **context of community engagement** that can occur throughout the entire cycle. Community engagement does not occur at any one time within accountability and continuous improvement systems, but throughout the system.

A key to the success of accountability or continuous improvement systems is that *leaders need to focus on the human interactions throughout the system*, but especially in the classroom, to ensure that teachers know what the accountability systems are measuring, what the continuous improvement systems are working to improve – and why (Gill et al., 2014; Lewis, 2015).

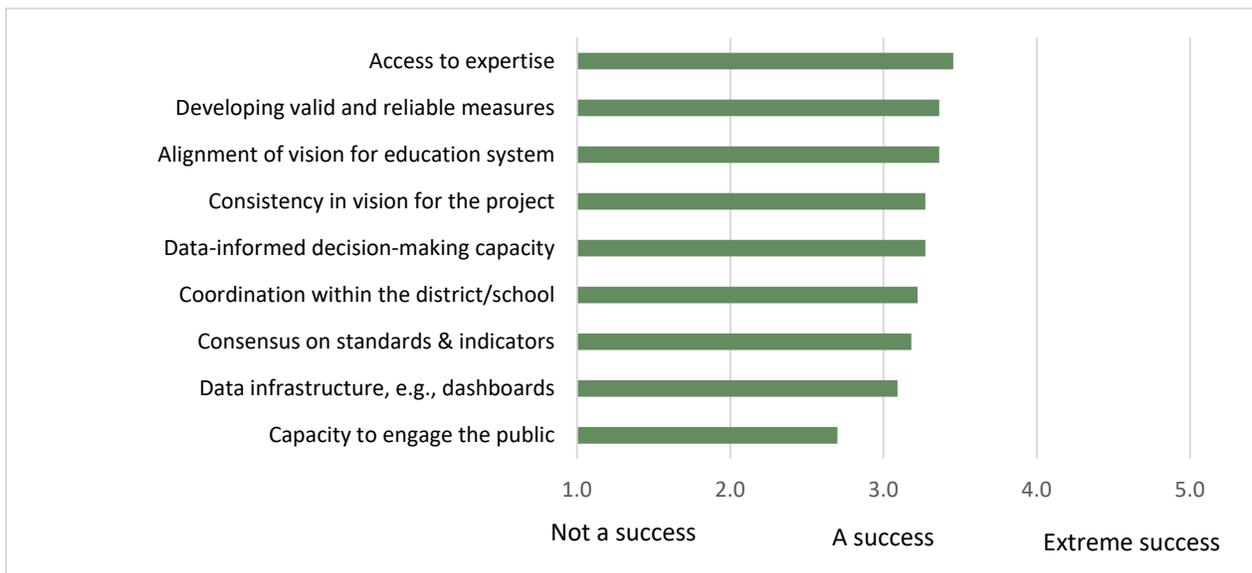
Participant Survey

As part of the LASG evaluation, program participants were surveyed to help the evaluation team describe the overall successes and challenges within the LASG. The survey was developed by APA in consultation with CDE. A link to the on-line survey was sent to 28 representatives of participating districts and Accountability Partners in May of 2023. Participants were sent a reminder email and had two weeks to respond to the survey. Eleven respondents participated in the survey for an overall response rate of 39%. Respondents represented both grant recipients (districts or schools) and Accountability Partners. A copy of the survey instrument is contained in Appendix B.

Perspectives on progress made on the grant were positive. The majority of respondents (six out of 11) said they had met their project goals. The remaining respondents said they were making progress toward their goals for the grant.

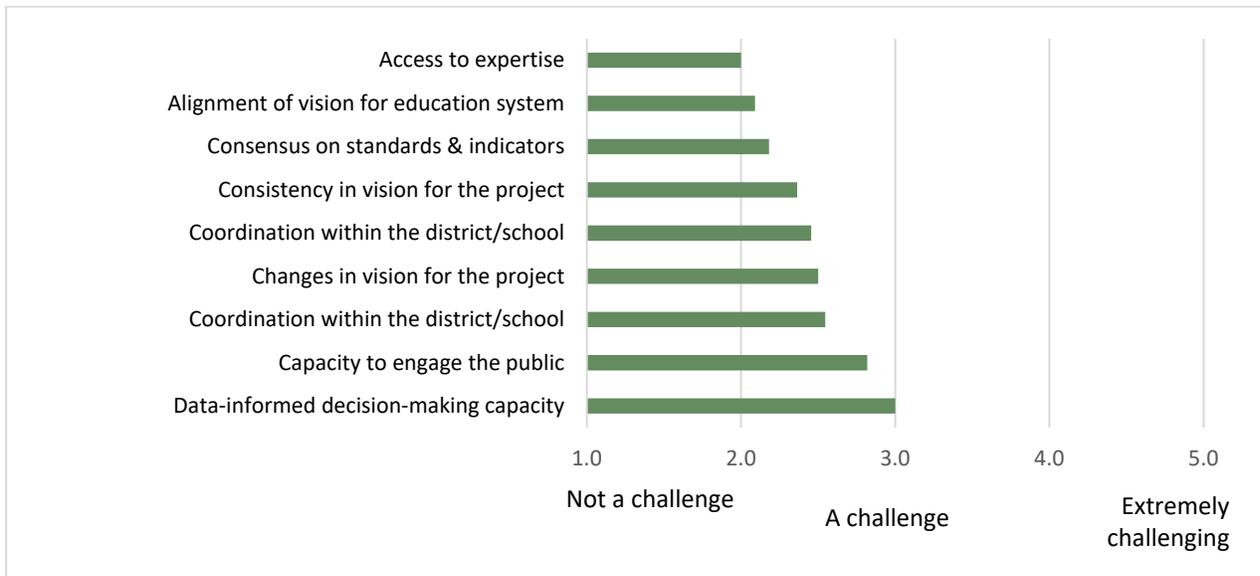
Respondents were asked to rate the success of nine different grant activities. Respondents were able to rate success using a five-level Likert scale ranging from Not a Success (1) to Extreme Success (5) and all the rating scale questions included a “Don’t know/Not Applicable” option. The higher the average response, the more an activity is seen as a success. Figure 3 below shows the results from that question. For all of measures, at least 50% of respondents identified that activity as a success with the lowest success rating for the “Capacity to engage the public” activity. All the remaining activities had an average rating of 3.0 or higher, which corresponds to a rating of “A success” or better, with the highest rated activity being “Access to expertise.”

Figure 3: Grant Activities Levels of Success



In a parallel fashion, respondents were also asked to rate the level of challenge of nine grant activities. The rating scale for the level of change ranged from “Not a challenge” (1) to “Extremely challenging” (5). Results from this question are shown in Figure 4. The highest level of challenge is associated with “Data-informed decision-making capacity,” which is the only activity with an average scale of 3 and corresponds to the “A challenge” rating. All the other activities were “Slightly challenging” or “Not a challenge.” Mirroring the success question, the least challenging activity was “Access to expertise.”

Figure 4: Grant Activities Levels of Challenge



In an effort to understand factors that supported or were challenging to LASG success, program participants were asked about contextual factors supported success or are a challenge to the LASG. Results from the question rating nine different sources of challenge are shown in Figure 5 below. Respondents rated the level of challenge on a five-level Likert scale from “Not a challenge” (1) to “Extremely challenging” (5). Two contextual factors stand out as challenges: “Existing data infrastructure” and “The pandemic.” Data and use of data is emerging as a barrier to the project: issues around data and capacity were identified in several questions as a challenge.

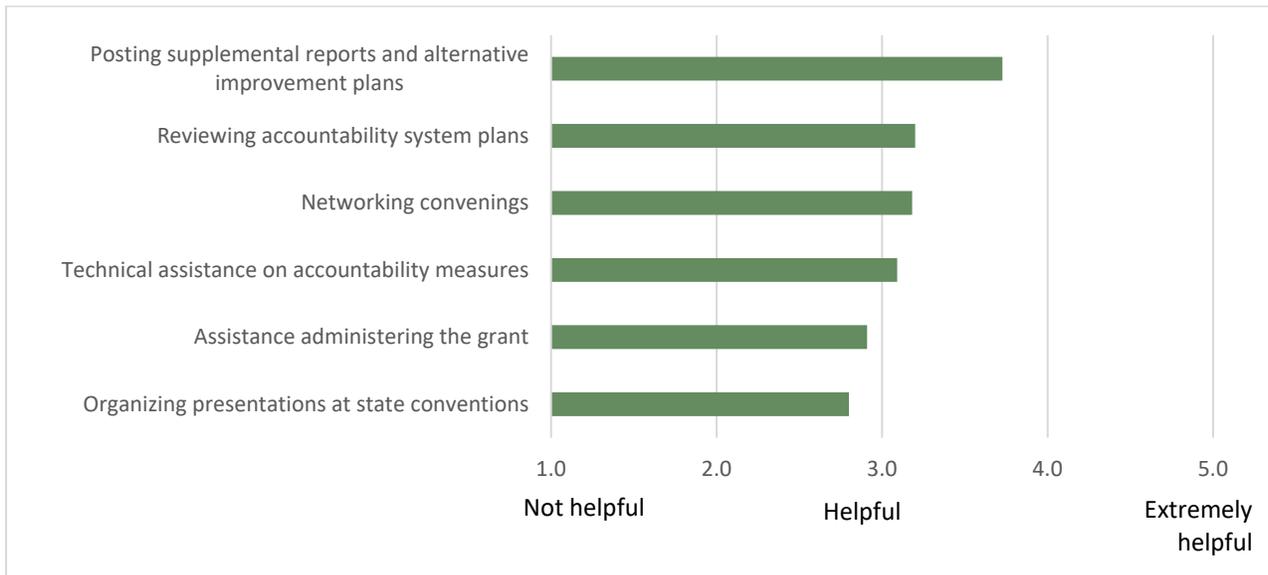
Figure 5: Grant Activities Levels of Challenge



The survey had several questions on the support provided by CDE. A question about valuable supports rated four supports listed as important to the success of the grant. These valuable CDE supports included assistance administering the grant, networking convenings, reviewing accountability system plans, and technical assistance.

LASG participants were also asked what additional support would be helpful to implementing the LASG. Six additional supports were rated on a five-level Likert scale ranging from “Not helpful” (1) to “Extremely helpful” (5). Results are shown in Figure 6 below. The support rated most helpful was “Posting supplemental reports and alternative improvement plans.” The process of providing this support involves posting local accountability reports and improvement plans on the CDE website.

Figure 6: Additional supports



Finally, respondents were asked using an open ended question about what the LASG was helping them accomplish. Multiple respondents wrote about **the value of developing accountability measures that are aligned with their local values** as well as the goals and mission of the school or district. Several respondents wrote about how this work helped **increase transparency and sharing of data with stakeholders**. Respondents described the **value of measuring student outcomes with measures beyond the statewide test**, and that this project has allowed them to connect district activities and processes (e.g., curriculum and professional development) with those outcomes.

Summary of Survey Results

The LASG participant survey provided valuable insight on the grant’s progress. Respondents agreed that they have either met or are making progress to grant goals. Eight of nine grant activities were rated as a success, with the only activity not being a success was “Capacity to engage the public.” Challenges were most often associated with data: capacity to make data informed decisions and data infrastructure e.g., data dashboards, data storage and data cleaning. Finally, supports from CDE were described as helpful with additional work around posting alternative accountability reports and improvement plans. Program participants said the posting of their alternative reports and plans on the CDE website helped increase the credibility of their work on alternative accountability systems. This will be discussed again in next section of the report.

Participant interview data

In addition to surveying LASG grantees, the APA team conducted document reviews and interviews with participating districts, Accountability Partners and CDE staff. This section provides the results of those efforts. The APA team collected data through semi-structured interviews on LASG progress, challenges, successes, how measures are being developed and used, and advice for other districts, CDE and the legislature. The interviewees were from five grantees selected because of their success with the grant in a diversity of contexts by CDE in consultation with APA. Documents reviewed for this section include the two legislative reports that were prepared by CDE, other documentation on the CDE website, as well detailed descriptions of each district's theory of action that were prepared by the Center for Practice Engaged Education Research (C-Peer) at the University of Colorado Denver and shared with the evaluation team. This chapter summarizes the results of those interviews in combination with document review.

Value of the LASG

Consistent with the survey responses, grant participants described the LASG as a success through the interview process. Interviewees were asked what components of the grant were valuable to this success, e.g., what problem did the grant help districts and schools address.

How does LASG Add to the Current System

The literature summary established that there are four main components of accountability and continuous improvement systems:

- establishment of goals,
- development of measures that can describe progress towards those goals,
- processes to use that data to inform changes in processes, systems and resource allocation, and
- on-going engagement of the public and staff.

As previously noted, the existing state system has all of those components. If the current state accountability system has all the components of accountability and continuous improvement systems, a key evaluation question is what does the LASG add? The following section describes different reasons districts and schools found the LASG valuable. First, many respondents were clear that the LASG allowed them to **develop local goals and measures that reflected their community values**. These values were reflected in the educational focus of districts and schools (particularly AEC schools) but may not be measured in the state accountability system. The state accountability system uses state level goals that are imposed on districts. The state system is an extrinsic form of motivation and the LASG allowed districts to develop local goals and measures that LASG participants found intrinsically motivating. By using local goals and measures, many schools and districts found it easier to engage the community in accountability and improvement processes. These local goals provided new avenues for engagement with their communities, including staff, because they felt more ownership. Interviewees believe this

improved engagement resulted in more support for the school system by the public and for increased improvement efforts by staff.

Second, the state accountability system measures focus exclusively on educational outcomes and does not include a **theory of action that connects district and school activities with the outcomes measured in the accountability system**. The UIP process provides a process to develop a theory of action but does not prescribe what measures districts should use. In other words, the state accountability system does not provide any information on whether the processes and systems such as instruction, curriculum, and school culture, provided by districts and schools are effective and which should be addressed to support improving student outcomes. Equally important, the data provided in the state accountability system is not seen as timely for the improvement process. Finally, the UIP process was viewed by some interviewees through the lens of compliance instead of an opportunity to develop a theory of action and measures. The LASG helped some districts and schools develop these theories of action and measures of processes that provided LASG participants with data and tools to improve student outcomes that is not available in the current system.

Another related concern of some participants was **the focus of the state's accountability system**. The state has equal requirements for schools and districts in terms of the UIP planning. However, much of the state's support and sanctions to schools and districts are focused on those that are in the bottom 15% of the state's ratings. Some LASG participants felt their local accountability systems allowed the focus to be on schools at all performance levels.

LASG interviewees had multiple **concerns with the measures in the state accountability system and how the measures are developed**. Not all concerns were shared equally by every LASG participant. Many LASG participants are from smaller districts, which represents the majority of Colorado districts, and they discussed how privacy rules prevent them from getting the data in the SPF and DPF needed to identify and respond to student challenges. Further, the use of three year averages to allow for public reporting was not seen by some LASG participants as a good source of actionable information given the age of some of the information. A second challenge with state accountability data was the high number of assessment opt outs, that is **non-participation in assessments**, which some district leaders believe has impacted the validity and actionability of the state data.

Another challenge identified by some LASG participants is that **state goals for student achievement do not seem realistic for all student populations and all districts**. In other words, because student characteristics such as poverty level are highly correlated with student achievement some interviewees question whether the same state goals are appropriate for all schools and districts. The local accountability systems allowed schools and districts to develop their own goals they felt were more appropriate for their populations.

Another concern about the state goals and measures identified by interviewed grantees is how **students may be counted multiple times in the SPF**. As discussed earlier, the SPF reports data for all students and for students in sub-groups (e.g., minority, English learner, low-income students). This sub-group

reporting reflects state and national goals around equity and improving outcomes for all students. However, this results in students who are in subgroups being reported more in the school and district rankings than students who are not in subgroups. Some LASG participants believe this counting of some students more than others led to inaccurate representations of district and school performance. The LASG provided an opportunity for districts to develop measures that some felt more accurately described district performance.

Through the LASG many participants felt the grant helped them develop goals, measures, improvement processes and public engagement processes that complemented the state system and were more actionable. *It is important to note that LASG participants do feel the state accountability system is valuable.* However, they felt additional local goals, measures, and processes are needed to support public engagement and ultimately improve outcomes for students.

Additional Accountability Measures

Many of the LASG participants developed or used measures as part of their local accountability systems that are not part of the state's accountability system. A key consideration for grantees is that these measures provide valid and reliable information on the processes or outcomes they are intended to measure. The LASG Accountability Partners play an important role in supporting grantee's work to identify additional measures that are aligned with local goals. They also provide valuable support in developing and validating these new measures. Four types of additional measures used LASG participants:

- Student achievement assessments, i.e., tests,
- Administrative data such attendance, discipline, student activity participation,
- Student, staff, and community surveys, often of subjects such as climate or community, and
- Locally developed qualitative data collection tools including interviews, focus groups and observation rubrics for observation of classroom and school-wide processes inside schools such as instruction.

These additional measures generally came from three sources:

- Off-the-shelf measures that have been validated by their publisher,
- Existing extant data that the school or district has been collecting for some time, and
- Measures developed by the LASG grantees, often involving a collaboration between school or district staff and the Accountability Partner.

These additional measures have different sources of information on their validity and reliability. **Validity** refers to how accurately the method measures something. **Reliability** refers to whether a measure can be relied upon to measure something consistently. The publishers of off-the-shelf measures provide information on the validity and reliability of their measures. Accountability Partners can play a very important role in helping LASG grantees evaluate the accountability and reliability information provided by vendors.

Existing data often measures things that schools and districts have experience measuring such as attendance or graduation rates. Implementing those measures in a reliable fashion does take a common understanding of business rules for those collecting the data. For example, attendance clerks need a common understanding of how much of a school day a student must miss to be counted as absent.

Finally, for measures developed by grantees, particularly grantees for smaller districts or individual schools, the **Accountability Partners can play an important role in the development of measures**, providing technical evaluation of measure validity and reliability as well as supporting the best use of those measures. For example, they can review inter-rater reliability of observational rubrics, review how evidence was identified and used in observations, and can facilitate review of data collection tools by grant participants. While Accountability Partners provided this technical support to smaller districts and schools, grantees from larger districts often have their own internal research capacity to validate measures.

It is important to note that a very important source of information on the validity and reliability comes through repeated engagement, review, and use of measures by the community. And, in the case of locally developed measures, these measures can and are continuously being revised to better meet the needs of grantees. For measures that are existing administrative data, questions about reliability and validity can lead to reviews of existing process to collect information and refinement of those processes.

Taken together, LASG grantees have many different tools to judge the reliability and validity of the measures they use. Other districts may be able to use similar measures in their own internal accountability systems. The most important consideration is **how these measures fit with district goals and theories of action for improving district performance**. Off the shelf measures are available for other districts to adopt (possibly with vendor support) and extant measures are already available for use in district accountability systems. The measures developed by grantees may require additional technical support for smaller districts to use while larger districts may have to devote some of their own technical resources towards supporting their use.

Accountability Partners

The LASG provides an opportunity to work with Accountability Partners. These partners provided expertise around development of theories of action, identifying appropriate measures, data visualization and public engagement. Interviewed grantees saw their expertise as extremely valuable in building the capacity of LASG participants from smaller districts and schools in developing local accountability systems and using those systems as part of their continuous improvement process.

Accountability Partners have helped districts and schools develop unique approaches to address their goals for accountability and improvement. For example, the MOPP consortia has provided support to AECs in identifying their goals and available measures to support accountability and improvement. AECs have specialized missions and are often small institutions with limited resources to use toward accountability and improvement. The LASG's Accountability Partners has helped address the need for additional resources to support AECs.

Peer Review

Another unique approach developed and implemented by some LASG participants is the use of **peer review to support accountability and improvement**. These reviews use rubrics developed by LASG grantees as they observe instruction and other processes in schools. Reviewers can be peers from other districts or peers from within a district. Reviewers provide feedback to schools and districts on what they observed. These reviews help build capacity in several ways. First, through the development of the rubrics school and district leaders develop and identify ways to measure practices they think are important to student outcomes. Second, through the observation process, participants learn how to identify and quantify practices that are important to student outcomes. And finally, through providing feedback all the participants reported growth in their understanding of these practices.

APA is currently serving as part of the evaluation team for the Colorado READ Act. The READ Act, through the Early Literacy Grant, provides a similar mechanism to Accountability Partners for schools and districts to bring in external expertise. In both the READ Act and LASG, APA finds that grants from the state that support bringing external expertise to districts and schools is a powerful tool for improvement. However, the READ Act evaluation has also shown that districts and schools must be purposeful in supporting the capacity developed by these external partners after grants have concluded. As LASG implementation continues, CDE may consider ways these practices can be sustained beyond the grant period.

Public Engagement

Public engagement is a key ongoing component of accountability and continuous improvement systems. It includes stakeholders within the community and staff within districts and schools. The LASG has supported **improved public engagement** and interviewees believe it has **improved public support for education** within communities. The LASG processes identified goals and developed measures that reflect local values. The improvement processes developed through this helps support the attainment of the local goals. Several interviewees said that public buy-in also requires public vulnerability. For the public to engage in the project, leaders had to be willing to discuss real problems and challenges facing the district. Through this **transparency**, which can open leaders for criticism, work on accountability and improvement systems can actually improve public engagement over time.

Several interviewees discussed how they were able to use LASG supported processes to **engage students in improvement processes** and how their perspectives provided insights into school challenges and success. In addition, interviewees stressed that while deeper engagement flowed from the processes being developed with LASG support, engaging non-traditional or disenfranchised populations requires additional focus and work.

Challenges to On-going LASG Success

Interviewees were very clear that **leader buy-in, particularly superintendent and local school board, is central to the success of LASG efforts**. This is a strength of the project: when leaders buy in, change can be impactful. It takes time and effort to build confidence in new systems and measures. In particular,

the community wants to see that new measures used in the local accountability and improvement systems are valid and reliable. Grantees said LASG participation can be time consuming for leaders. Leader buy-in can also be a challenge for LASG efforts: when leaders change, bringing new vision and priorities to the district can then result in de-prioritization of this work.

Another challenge that was described by most interviewees was **data management and visual representation**. Data is central to accountability and improvement systems. Data is generated as part of the measure process and then through the change process data must be analyzed, contextualized, and used to identify successes, challenges, improvement strategies, and goals for future outcomes. This process of using data to inform change requires that **data be consolidated and contextualized**. This requires both data management expertise to access consolidate and represent data and measurement expertise to validly represent data.

Next steps and recommendations

This year's evaluation has found the LASG program to be a success. It has helped schools and districts develop local accountability and improvement systems. Through this work, new valid and reliable measures of local goals and processes have been developed or identified for use in local accountability systems. However, it does not replace the current state accountability system. While grantees work to address perceived shortfalls of the current system with their locally developed system, this does not mean that they do not see value in the state system. For example, the LASG has built capacity to better implement the state's current accountability system for AECs, by building capacity within AECs to better identify accountability measures aligned with the individual school goals.

The state system imposes values, goals, measures, and improvement processes on school districts and is an extrinsic accountability system. The local accountability and improvement systems have provided intrinsic value and motivation. The locally developed systems are valuable because they are locally developed and reflect locally identified goals.

A key question is what lessons or measures or tools developed through the LASG can be disseminated or used by other districts. CDE staff have already used sessions at the Colorado Association of School Executives (CASE) conference to increase district leader knowledge of LASG activities. The measures and processes developed by LASG grantees could be valuable to other districts. However, the value comes from the measures and processes supporting locally developed goals. Without the connection between measures, processes, and local goals, as well as leadership buy-in and community engagement, the measures and processes developed by LASG grantees are not valuable to other districts. And it is important to note that many of the locally developed measures are regularly updated and changed as challenges with the measure are identified and as goals and needs of LASG grantees evolve. To support the dissemination and use of locally developed goals, the state could further engage in discrimination of the measures. This could include the development of materials that clearly describe goals and outcomes that are measured, the evidence of validity and reliability, and the resources needed to build the capacity to use the new measures.

The LASG grantees **value the ability to link their accountability plans within the state's website**. Having the local system recognized by the state provides value and credibility to local efforts. This capacity to link the local and state accountability and improvement efforts should be expanded to make it easier for local accountability reports to be shared along with state SPF and DPF reports.

A challenge identified with the current state system by local grantees is that **privacy concerns** override district staff's ability to access all state accountability data for smaller districts and schools. Current public SPF and DPF reports do not report personally identifiable information (PII) such as achievement and growth scores. Given that district and schools staff have access and use to other PII about students, it is not clear why the state's accountability related PII would not also be available to district staff through some sort of private on-line access. Private reports are available to district staff, but knowledge of the availability of and how to access these newer private reports remains a challenge. Making it easier for small districts to access and use complete state accountability measures about the students within the districts will address this challenge identified by interviewees.

The **Accountability Partners have provided valuable capacity to local districts** as they do this work. The use of external partnerships to help build capacity in schools in districts is a powerful policy tool and appears to be one way the state can help local districts build capacity in this area.

The second year of the LASG evaluation will focus on quantitative measures using both statewide accountability measures and locally developed measures to identify and describe LASG successes and challenges.

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Appendix A –Accountability and Continuous Improvement Systems Literature Summary

Context

The following short literature summary provides context to the upcoming evaluation of the grants program authorized by SB19-204 Public School Local Accountability Systems and operated by the Colorado Department of Education (CDE). The goals of the evaluation are to learn about new systems of continuous improvement developed by the grantees through these grants and learn about the measures and related data systems developed by grantees to support accountability and continuous improvement. To reach these goals, the following evaluation questions will be explored:

1. How do successful grantees design and implement effective continuous improvement systems as part of their accountability systems?
2. What are the successes, challenges, and lessons learned, and what are the contextual factors at each site that may have contributed to those successes and challenges?
3. What measures do these accountability systems use, and how?
4. Are there leading indicators of success that grantees have observed or identified when implementing their local accountability measures?
5. What is the perceived reliability and validity of these measures?

To provide the context for the evaluation, the common structures for effective accountability and continuous improvement systems are described with critical elements identified, which will highlight the key characteristics of implementation drivers.

Introduction

Accountability has deep roots in American public education history (Loeb & Byun, 2019; Spring, 2016). Since the common school movement in the late 1800's school leaders gathered information to help the public and policymakers make decisions about how well schools are educating students. The evolution of accountability systems reflects different audiences, such as parents, school leaders, district leaders, elected officials, and state and federal education departments.

While accountability has evolved, continuous improvement is a relatively new concept honed in the manufacturing and medical fields, which education leaders recently adopted. Continuous improvement differs from accountability because its primary assumption is the system needs to be changed to reach desired outcomes. The system assumption pushes people in the system to focus on system design and operations (Bryk et al., 2015; Grunow et al., 2018).

The following summary incorporates research on accountability systems and continuous improvement systems. First, descriptions of the common accountability structures and continuous improvement systems are provided. The second part describes critical elements in current accountability and continuous improvement systems.

Accountability Systems

Since 2000, and especially with the passage of the No Child Left Behind Act in 2001, most school and district accountability systems follow the administrative model within which districts measure schools based on student outcomes, which then help to target resources (Loeb & Byun, 2019). In a framework described by O'Day (2002), the theory of action for an accountability system rests on the perspective that the most effective system improvements that lead to increased student achievement happen in the classroom. The framework has four components:

5. Generate and focus **attention** on information relevant to teaching and learning.
6. **Motivate** educators (and others) to attend to relevant information and expend effort to augment or change strategies in response to this information.
7. Develop the **knowledge** and skills to promote a valid interpretation of the information (at both the individual and system levels).
8. Allocate **resources** where they are most needed (O'Day, 2002).

Researchers used O'Day's framework as a foundation for which to analyze accountability systems. For example, the Consortium for Policy Research in Education (CPRE) used O'Day's (2002) framework of attention, motivation, knowledge development, and resource allocation as the framework for the team to analyze an early adopter of a comprehensive accountability system, Chicago Public Schools (CPS) in 2003-04. CPS' efforts to establish an accountability system resulted in further questions about the limitations of complex and bureaucratic systems.

The CPRE research team found wide variability in the responsiveness of schools to CPS' new accountability system. Indeed, one suggestion was that schools with inadequate resources fell further behind. While CPRE's final analysis highlights the complicated nature of understanding the effectiveness of large urban schools, the critical indicator of effectiveness used was the Iowa Test of Basic Skills, which is a lagging indicator, meaning that the data inform interested parties after changes can be initiated (Fuhrman & Elmore, 2004). Because teachers and administrators receive the data from the tests after the school year, several education researchers raise questions about the extent to which the information is helpful for teachers to improve their instruction (Hess & Martin, 2022; Hutt & Polikoff, 2020; Loeb & Byun, 2019; Ravitch, 2010; Ravitch et al., 2022).

As accountability systems evolved over the past twenty years, interested parties work to identify leading indicators of success that can be gathered in real-time, such as attendance data. For example, a school performance framework (SPF) is a component of an accountability system that is usually developed by school districts to understand how individual schools are performing. In some cases, the measures are tabulated and consolidated into a single score that provides both feedback for educators through the tabulation and to the public through the single score.

Bellwether, a consulting firm that works with states and districts to engage with reform efforts, summarized the approaches used by five districts when aggregating and using data:

1. System Management and Accountability;
2. School Continuous Improvement; and
3. Family and Community Information.

When a district aggregates data for system management and accountability, these data are used for decisions such as school expansion, sanctions, charter renewals, or closures. With a continuous improvement framework, the intended audience is school leaders who access data to make day-to-day strategic decisions such as interventions. Finally, with data aggregated for external audiences, families can navigate choice options, and advocates can identify improvement areas.

Post-ESSA Accountability Systems

Federal legislation reflects the evolution of accountability systems. Policymakers learned from the rigid requirements within NCLB and adjusted during the reauthorization process, which resulted in the 2018 Every Student Succeeds Act (ESSA). Changes within ESSA mainly focused on the indicators and interventions using O’Day’s model (2002). Fryer (2022), who served as part of the team who drafted ESSA in her role as a senior policy advisor to Senator Lamar Alexander (R-TN), explains there are four main opportunities for state accountability systems within the law:

1. New accountability indicators, including new assessments that allow for student personalization;
2. Flexibility on indicator weighting;
3. New Identification systems for low-performing schools; and
4. State and local control for interventions.

Within these parameters, states are exploring new accountability options. For example, five states are piloting personalized assessments: Georgia, Louisiana, Massachusetts, New Hampshire, and North Carolina (Fryer, 2022). Using Louisiana as a case-in-point, its statewide accountability system allows for a new English and Social Studies assessment to assess student comprehension of district-selected passages several times per year, thus, illustrating the shift to include different assessments teachers can use during the same school year and assessments that focus beyond reading and math.¹⁶

Continuous Improvement Systems

The language changed to continuous improvement systems as accountability systems began to work on a faster cycle than the yearly cycle of original accountability systems. The shift reflects more accurately how states and districts focused their attention and resources, similar to how O’Day discussed (2002). Grunow et al. (2018) created a general definition of continuous improvement “as the ongoing

¹⁶ For more information about [Louisiana’s state report card](https://louisianabelieves.com/resources/about-us/louisiana's-key-initiatives), see “Louisiana’s Key Initiatives.” <https://louisianabelieves.com/resources/about-us/louisiana's-key-initiatives>.

disciplined efforts of everyone in the system to make evidence-based changes that will lead to better outcomes, system performance, and organizational learning” (p. 3). The researchers further explain:

Continuous improvement approaches engage the workforce to identify and improve the critical causes of problematic outcomes, which necessarily lie upstream from the end-of-the-line outcomes of accountability systems. (p. 10)

Indeed, the definition reflects the use of leading (what do we know today) versus lagging (what will we know in the future) indicators. Furthermore, Grunow (2018) delineates three different elements of continuous improvement informed by leading and lagging indicators: (1) cycles; (2) methodologies; and (3) culture (Grunow et al., 2018). Cycles are clear steps educators take to act and reflect on their work and can be as short as analyzing a daily lesson or as long as a year. Methodologies are more formal structures developed by outside organizations. For example, in 2008, the Carnegie Foundation for the Advancement of Teaching introduced Networked Improvement Communities (NICs) that provided experts to advise schools as they worked through continuous improvement cycles. Finally, culture focuses on enabling collaboration and continuous learning within the workplace. A few distinguishing characteristics of a culture of continuous improvement include an appreciation of differences and an openness to new ideas.

A guiding principle for a continuous improvement system is improvement science. Improvement science is rooted in the scientific method in that small experiments are created to gather information about a problem of practice.¹⁷ (Fixsen et al., 2015; Hannan et al., 2015). Hannan et al. (2015) explain one way to approach continuous improvement by using a methodology with four phases – plan, do, study, act (PDSA) – in detail:

Planning a small experiment—or small test of change—to learn, making predictions about the experiment's outcome; doing or executing it in practice; studying what happened; then reflecting and acting upon the first three phases. An essential part of the reflection is comparing what happened with what was predicted. New insights come to light from the gap between expected and actual results. (p. 496)

Louisiana is again an instructive case-in-point in that researchers highlight how the state report card informs the state's continuous improvement methods used with districts because Louisiana added measures to its accountability system to inform how the state department can enable teachers to support students to reach higher academic goals. For example, its statewide accountability system allows for a new English and Social Studies assessment to assess student comprehension of district-

¹⁷Industries beyond public education use improvement science. See, for example, manufacturing's Six Sigma methods (<https://asq.org/quality-resources/six-sigma>) and healthcare's movement toward more equitable care (Kenney, C. (2008). *The best practice: How the new quality movement is transforming medicine*. New York, NY: Public Affairs).

selected passages several times per year. Data are gathered, analyzed, and teachers can adjust instruction as needed (Hutt & Polikoff, 2020; Kaufman et al., 2016).

In sum, in a continuous improvement setting, small groups work with data consistently to understand the changes that need to happen to reach the desired outcomes within the system. In addition, the literature summary revealed key differences between accountability and continuous improvement systems, including:

4. Continuous improvement is a system created within an organization, while accountability can be imposed from outside
5. A locally generated continuous improvement system can be more flexible in the measures used, change those measures, make them match local goals, use more leading indicators, and measures that are maybe not as reliable since the stakes are not as high.
6. The cycle for continuous improvement is more rapid than yearly accountability.

The following section discusses critical elements needed within accountability and continuous improvement systems.

Critical Elements

Within accountability and continuous improvement systems, several critical elements are evident, including stakeholder engagement, clear goals or desired outcomes, measures progress towards those outcomes, and changes within the system or processes to move towards meeting those goals. In either an accountability system or a continuous improvement system, these critical elements combine to form a theory of action: if stakeholders identify a set of desired outcomes, measure them and use that data to change systems or processes, then student outcomes will improve.

The theory of change is rooted in O'Day's (2002) framework discussed throughout the literature review. The original framework intended to serve as a way for states, districts, or schools to improve. With the addition of stakeholder engagement, it also addressed O'Day's underlying problems with accountability systems:

1. Accountability is generally at the school, while the changes need to occur within classrooms
2. There are internal and external audiences and, therefore, goals
3. The measures need to be valid and accurate in order to reflect the goals of teaching and learning

In addition, contemporary accountability and continuous improvement systems inform the theory of action, which reflects a growing acknowledgment that all parts of a school system (families, students, teachers, school leaders, district leaders, and elected officials) engage with a growth mindset.

Community Engagement

Community engagement gathers information about what is needed in classrooms and schools to help students reach the community's expectations. The community encompasses people invested in the school system, from parents choosing schools for their kids to elected officials who set standards and decide school funding levels. A few questions that the community considers as accountability systems are developed include:

- What improvements need to be made within the system?
- What data are collected by the system?
- Are the data collected aligned with the improvements?
- To what extent are the data collected available to those who need it? (Gill et al., 2014; Grunow et al., 2018; O'Keefe et al., 2019)

Additionally, community engagement with teachers at the classroom level honors one element of continuous improvement, which is to understand what is needed where students are learning: within classrooms. To develop systems, the community identifies a set of desired outcomes discussed in the next section.

Goals

As community members consider what improvements need to be made within the system, they identify goals for the students served by the system. The goals for students are generally long-term and reflect if students are ready for postsecondary success (aka, readiness¹⁸). Also, many outcomes are in the state standards, developed within education departments, and sometimes informed by statute. Often national experts develop these standards, such as the work to develop the Common Core from 2008-2012.

Measures and Assessments

Once desired goals are identified by interested parties, when appropriate, measures are used to track progress toward reaching the outcomes. In general, outcome measures include data such as:

- Graduation rates
- College enrollment
- College persistence
- Career or military readiness

The long-term outcomes are broken into components that are understood to be leading indicators or milestones that lead to desired outcomes, such as:

- Freshman on track to graduation

¹⁸ Readiness can be defined as prepared for college, a career, or the military. Some systems define readiness in terms of being prepared for civic engagement. Goals such as increased graduation rates, improved performance on nationally normed standardized assessments, or other meaningful goals are set.

- Attainment on the ACT or SAT
- Student Attendance

Since the passage of the No Child Left Behind Act in 2001, states and districts have used assessments to measure the extent to which students are proficient in core subjects. At first, proficiency was simply used as a measure. Then more sophisticated analyses were conducted to measure growth. As the use of assessments became normalized across the country and assessment data became more and more high-stakes, prompting much debate. The debate about assessments used in accountability systems has centered around the challenge of using lagging indicators (data that are made public the next school year) because teachers could not take immediate action within their classrooms, such as the challenge the CPRE team found in Chicago (O'Day, 2002). Indeed, some district leaders cheated within the assessment systems (Blinder, 2015).

Ravitch et al. reflect on the high-stakes notion of statewide assessments, and, in general, pointed questions remain about the lagging nature of statewide assessments to ascertain the effectiveness of public education (Hutt & Polikoff, 2020). However, the constant throughout the 20-year journey of statewide annual assessment implementation is that the systems in American education collect large amounts of data to understand how students are performing – and those data are disaggregated, so federal and state, and local policymakers can see who needs more support (Fuller, 2022; O'Keefe et al., 2019; Olson, 2020; Ravitch et al., 2022; Schueler & West, 2022).

Nevertheless, another way to think about the objective of the use of assessments within an accountability system is to consider an analogy offered by a former Long Beach Public Schools Superintendent, Carl Cohn: "we should think about refining the design and uses of assessment to be more like the medical field: looking for the right dose, the right time, for the right patient" ("Forum: Do Policymakers Use Educational Assessment?," 2019). Therefore, when identifying measures, several questions should be asked about the characteristics of assessments, such as whether or not the assessment is:

- reliable (does it provide consistent information?),
- valid (does it measure what it was designed to measure?), or
- comprehensive (does it cover all standards?) (Gill et al., 2014; Loeb & Byun, 2019; Moon et al., 2020; Murphy, 2017; Polikoff et al., 2020; Ravitch et al., 2022).

Ultimately, "the test of whether the usefulness of the measures outweighs their imperfections is whether they appear to improve educational opportunities for students and lead to better decisions" (Loeb & Byun, 2019, p. 101). Questions about assessments branch into types needed to measure a system, how to assess standards, and why. As states and districts grappled with these assessment questions, some moved to measure student growth on the assessments.

The current state of assessments reflects the flexibilities within the Every Student Succeeds Act (ESSA) passed in 2015 (Hess & Martin, 2022; Olson, 2020; Ravitch et al., 2022). In addition, ESSA, combined with the education challenges during the pandemic, created an environment where advocates from across the political spectrum ask questions about the future of assessments and accountability.

The opportunity results in many interested parties weighing in on what assessments are needed (Hess & Martin, 2022; Kaufman et al., 2016; Ohlson et al., 2016; O’Keefe et al., 2019; Ravitch et al., 2022; Vaandering & Moss, 2022). For instance, the nation’s largest teachers union, National Education Association (NEA), identified its members’ hopes in a recent publication entitled “Principles for the Future of Assessment,” which include:

1. Create community-based and student-centered processes for assessing student growth, learning, and development.
2. Design assessment that inspires learning. Assess what is meaningful to student well-being, learning, and individuality. (Vaandering & Moss, 2022).

Given the range of perspectives, one conclusion is that assessment data are essential, yet, being intentional about what assessment data are used and when is an essential component of any data system. As one example, to help with thinking about what assessments are needed for decision-making, Mathematica created a chart to illustrate the levels within the system and how they could use data (Gill et al., 2014).

Educational DecisionMaker	Data Uses
Classroom teachers	<ul style="list-style-type: none"> • Assessing the needs, strengths, progress, and performance of students • Developing and revising classroom instruction • Understanding professional strengths and weaknesses
School administrators	<ul style="list-style-type: none"> • Assessing the needs, strengths, progress, and performance of staff and students • Developing and revising school plans, targets, and goals • Monitoring the implementation of school practices, programs, and policies
Superintendents, school boards, district staff, charter management organization leaders, charter authorizers	<ul style="list-style-type: none"> • Assessing the needs, strengths, progress, and performance of schools, staff, and students • Developing and revising district curricula, standards, plans, targets, and goals • Monitoring the implementation and impact of district practices, programs, and policies
State education agency officials	<ul style="list-style-type: none"> • Monitoring statewide achievement and attainment levels, overall and for subgroups, statewide and by school/district • Monitoring and reporting measures of school performance (that is, value-added) • Measuring teacher value-added • Monitoring human capital pipeline • Evaluating program implementation and impacts • Developing and revising state standards, curricula, and goals

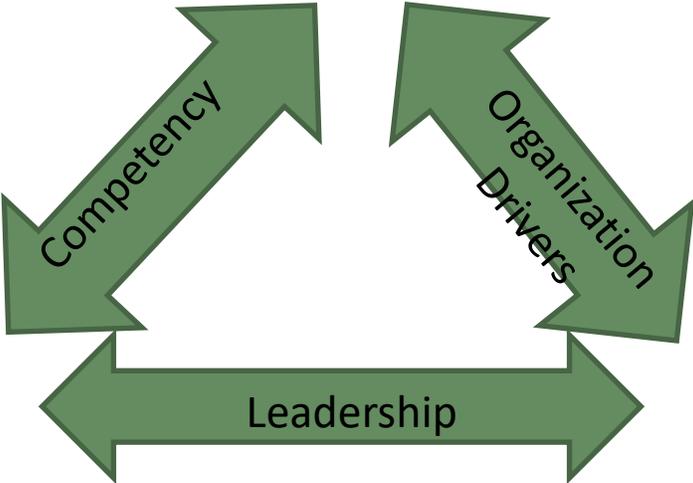
The chart needs to include data for external consumption, such as data for families and wrap-around service providers who complement the public education system. Nonetheless, the critical element of assessment data helps to identify the different types of support that educators need to support students throughout their PreK-12 experience, which are discussed in the next section.

Changes in Systems and Processes to Meet Goals

Changes to systems and processes within the public education system as part of accountability and continuous improvement are multi-layered. They can range from focusing on classroom interactions to how state leaders interact district leaders. As highlighted in the O’Day framework, these changes often include resource reallocation. Nevertheless, all discussions about system and process change center on the essential question: how do we achieve desired outcomes?

One way to think about system and process changes in relation to accountability or continuous improvement system is to identify the implementation drivers. Implementation drivers were identified by researchers at the National Implementation Research Network (NIRN) as common practices among successfully implemented practices and programs, as illustrated in Figure 1. The three drivers are Competency, Organization, and Leadership supports.

Figure 1: Implementation Drivers



Source: Adapted from Fixsen et al. (2005)

Improved outcomes for students require a change in practice, and competency drivers are how new practices, skills, and knowledge are taught to selected staff through training and coaching. The organizational supports create a hospitable environment of innovation and change. This includes information systems for monitoring progress, processes, and resources or materials necessary to carry out new programs. Leadership helps surface and resolve problems, sets priorities, and manages the change processes. The Implementation Drivers tool can provide a framework for assessing the availability of the critical elements of effective accountability and continuous improvement systems (Fixsen et al., 2015).

The literature revealed state-level support structures in Louisiana and California to understand where teachers, school leaders, and district leaders need support. Louisiana emerged due to RAND's American Teacher Panel survey analysis, in which researchers found that teachers in the state accessed the Louisiana Department of Education's resources more than teachers in other states (Kaufman et al., 2016). In addition, Louisiana students increased in their college and career readiness; 11th-grade students gained more points on the ACT composite scores; the number of Advanced Placement courses doubled; fourth-grade NAEP reading scores showed the highest growth in the country. So, RAND asked: why? The highlights of the research results describe three critical support elements from the state department of education:

1. A coherent academic strategy focused on integration, alignment, and quality among systems supporting standards.
2. Transparent and regular communication about academics within the state department and across layers of the education system
3. Strong support for local decision-making and ownership of change by districts and teachers (p. 12).

State-level leaders in Louisiana provided support to the state's teachers with resources such as a list of materials aligned with the Common Core State Standards (CCSS) and training on identifying instructional resources aligned with the CCSS.

California policymakers have taken more detailed steps, with the state creating a Dashboard with accountability elements that identify districts needing more targeted services through a "System of Support," which is provided mainly through County Offices of Education. There are four features of California's System of Support:

1. a focus on serving particular student groups, especially those who have been historically underserved;
2. a focus on school districts as well as schools;
3. a focus on capacity-building rather than externally developed interventions; and
4. a continuous improvement approach (Grunow et al., 2018).

Polikoff (2021) summarizes the discussion about change to reach goals described in state-identified standards such as the Common Core (Hutt & Polikoff, 2020; Polikoff et al., 2020). The main question he explores is: to what extent is instruction aligned to standards? The method he uses to understand this question is to survey teachers about what they teach, and then he compares the answers to what the standards say they should teach. The results are a wake-up call: a high level of misalignment. As Polikoff explores different ways to reach alignment, he concludes that a high-quality curriculum is a solution to strengthening the support within the system. Not by providing a scripted curriculum, per se, but ongoing work with teachers that focuses on how they can more tightly align their instruction to standards – which are what the assessments are measuring.

Summary

In the current education climate, accountability and continuous improvement have converged, with evidence that when a system implements elements thoughtfully and with care, students benefit in multiple ways (Bryk et al., 2015; Grunow et al., 2018; O’Keefe et al., 2019). As seen in Louisiana and California, accountability can support continuous improvement systems, particularly when they use data that helps to inform instruction more quickly than annual assessments.

Perhaps the biggest lesson about the use of accountability or continuous improvement systems is that leaders need to focus on the human interactions throughout the system, but especially in the classroom, to ensure that teachers know what the accountability systems are measuring, what the continuous improvement systems are working to improve – and why (Gill et al., 2014; Lewis, 2015). Fullan and Quinn (2016) explain this concept as coherence. To explain, they provide a framework for coherence in systems, which is at once reminiscent of O’Day’s (2002) framework and combines accountability with continuous improvement:

1. focusing direction;
2. cultivating collaborative cultures;
3. deepening learning; and
4. securing accountability.

Fullan and Quinn (2016) emphasize the importance of leaders pulling these four levers simultaneously with an eye toward individual and collective improvement. As they explain the highlights of what coherence is not and what it is, they highlight how human interactions are integral to coherence.

Appendix B: LASG Survey

Introduction This survey is part of the Local Accountability System Grant evaluation being conducted by Augenblick, Palaich and Associates (APA Consulting) for the Colorado Department of Education. The surveys should take no more than 10 minutes to complete. Please complete this survey by May 29, 2023.

Your responses will be anonymous. Only aggregated data will only be shared with CDE and the public, individual responses will not be shared.

If you have any questions, please contact Lisa Steffen at CDE (steffen_l@cde.state.co.us) or Robert Reichardt at APA Consulting (rer@apaconsulting.net).

Q1 Please identify the district/school or accountability partner you are associated with.

Q2 How would you judge your progress on the Colorado Local Accountability System Grant?

- We have surpassed our goals for this project. (1)
- We have met our project goals for the project. (2)
- We are making progress towards our project. (3)
- We are beginning to make progress towards are goals. (4)
- We have not yet started to make progress towards our goals. (5)

Q3 Please describe the level of challenge associated with each Local Accountability System Grant activity.

	Not a challenge (1)	Slightly challenging (2)	A challenge (3)	Significant challenge (4)	Extremely challenging (5)	Don't know/Not applicable (6)
Coordination within the district/school (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Alignment of vision for education system (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing consensus on standards and indicators aligned with vision (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing measures that are valid and reliable (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data infrastructure, e.g., developing dashboards, data storage, data cleaning (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity to use data-informed decision making (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity to engage the public (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in vision for the project (8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to expertise (9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q4 Please describe the level of success with each Local Accountability System Grant activity.

	Not a success (1)	Slight success (2)	A success (3)	Significant success (4)	Extreme success (5)	Don't know/Not applicable (6)
Coordination within the district (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Alignment of vision for education system (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing consensus on standards and indicators aligned with vision (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing measures that are valid and reliable (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing data infrastructure, e.g., developing dashboards, data storage, data cleaning (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity to use information, e.g., data informed decision (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity to engage the public (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consistency in vision for the project (8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to expertise (9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (10)

○ ○ ○ ○ ○ ○ ○

Q5 What about your district/school context has contributed to the successes of the Local Accountability System Grant?

	Not important to success (1)	Somewhat important contribution (2)	Important to our success (3)	Very important to success (4)	Extremely important to success (5)	Don't know/Not applicable (6)
District/school is the right size for this work, e.g., capacity, cross team coordination, scalability, etc. (1)	○	○	○	○	○	○
Great people participating in the grant (2)	○	○	○	○	○	○
Our existing data infrastructure (3)	○	○	○	○	○	○
Our work on accountability/continuing improvement before the grant Consistent leadership (4)	○	○	○	○	○	○
Consistent staffing of the project (5)	○	○	○	○	○	○
Access to expertise (external and internal) (6)	○	○	○	○	○	○
Access to resources, e.g., time or money (7)	○	○	○	○	○	○
Other (8)	○	○	○	○	○	○

Q6 What about your district/school context has been a challenge of the Local Accountability System Grant?

	Not a challenge (1)	Somewhat a challenge (2)	Challenging (3)	Very challenging (4)	Extremely challenging (5)	Don't know/Not applicable (6)
District is the right size for this work, e.g., capacity, cross team coordination, scalability, etc. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Getting the right people to work on the project (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Our existing data infrastructure (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not enough work on accountability/continuing improvement before the grant (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconsistent leadership (e.g., shifting priorities) (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconsistent staffing of the project (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The pandemic (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to expertise (internal and external) (8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to resources, e.g., time or money (9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q7 How valuable have the following supports for the Local Accountability System Grant been?

	Not important to success (1)	Somewhat important contribution (2)	Important to our success (3)	Very important to success (4)	Extremely important to success (5)	Don't know/Not applicable (6)
Assistance administering the grant (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Networking convenings (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reviewing accountability system plans, e.g., theory of action (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technical assistance, e.g., on accountability measures, stakeholder engagement, state and federal expectations (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 What additional supports for the Local Accountability System Grant would be useful to you?

	Not helpful (1)	Somewhat helpful (2)	Helpful (3)	Very helpful (4)	Extremely helpful (5)	Don't know/Not applicable (6)
Assistance administering the grant (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Networking convenings (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reviewing accountability system plans (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technical assistance on accountability measures (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Organizing presentations at state conventions (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Posting supplemental reports and alternative improvement plans (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q9 What is this Local Accountability System Grant enabling you to do that is hard to do in the current system?

Q10 Anything else?

End of Block: Survey
