

Council of Chief State School Officers

**BLUEPRINT FOR BUILDING
A SINGLE STATEWIDE ACCOUNTABILITY SYSTEM**

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Council of Chief State School Officers

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Table of Contents

Executive Summary.....	2
Introduction and Purpose.....	3
Step #1: Understanding the Role of Accountability	5
Step #2: Understanding the Federal Legal Requirements	7
Step #3: Understanding the State Context	8
Step #4: Establishing Guiding Principles	12
Step #5: Addressing Four Key Questions on Accountability.....	13
⇒ AYP Design Template.....	14
⇒ State Criteria Design Template.....	16
⇒ Integration Design Template.....	18
⇒ Rewards and Consequences Design Template.....	20
Proposal.....	23
About the Authors/Acknowledgments.....	27
Appendix I: No Child Left Behind, §§ 1111, 1116	
Appendix II: No Child Left Behind Regulations, 34 C.F.R. 200.12-200.21, 200.30-200.53	
Appendix III: No Child Left Behind Final Regulation on Alternate Assessments for Students with Disabilities	

Executive Summary

- **Introduction and Purpose:** The No Child Left Behind Act of 2001 (NCLB) presents states with substantial new requirements regarding school and district accountability. The purpose of this Blueprint is to guide states through a process that can help each state take advantage of the full range of NCLB flexibility and integrate NCLB requirements with prior and current state law on accountability to form a single statewide accountability system that meets federal requirements and best serves the state’s education values and goals. This document describes five steps that can help each state develop its proposal for building a single statewide accountability system.
- **Step #1 – Understanding the Role of Accountability:** Accountability is—first and foremost—a key education strategy designed to improve student achievement. Thus, each state’s accountability system, including its incorporation of federal legal requirements, must—first and foremost—be designed to generate valid and reliable accountability determinations, in which accountability judgments lead to appropriate educational interventions that in turn lead to improved educational outcomes.
- **Step #2 – Understanding the Federal Legal Requirements:** NCLB requires that each state establish a “single statewide accountability system” (including “adequate yearly progress” (AYP) determinations for every public school and district), and a system of “rewards and sanctions” applicable to every public school and district (including required consequences for Title I schools and districts). NCLB defines AYP with specificity, but it also affords states some flexibility in defining AYP and in fitting fit AYP within prior and existing state accountability systems.
- **Step #3 – Understanding the State Context:** Prior to NCLB, many states had existing accountability systems established under state law. These state systems likely provide vital foundations on which future state accountability systems should be built. This Blueprint is designed to help states define and incorporate NCLB accountability/AYP requirements in a way that can build upon and improve each state’s existing accountability system.
- **Step #4 – Establishing Guiding Principles:** In seeking to build a broader statewide accountability system that integrates AYP and state accountability systems, each state should first establish broader guiding principles that reflect the state’s unique education values and goals. These principles should then drive specific design decisions.
- **Step #5 – Addressing Four Key Questions on Accountability:** There are four key questions that must be addressed in order to build a single statewide accountability system that meets federal requirements and addresses each state’s education values and goals: (1) How should AYP be defined? (2) What additional state criteria should be considered? (3) How should AYP and state criteria be integrated in a single statewide accountability system? And (4) what rewards and consequences should apply?
- **Proposal for Discussion:** Based on each state’s guiding principles and the four key questions above—and by using the process presented in this Blueprint—each state can develop its proposal for building a single statewide accountability system that validly and reliably holds schools accountable, improves student achievement, meets federal requirements, and best serves the state’s specific education goals.

Introduction and Purpose

- **New Federal Requirements on Accountability:** The No Child Left Behind Act of 2001 (NCLB) requires that states develop a “single statewide accountability system,” including “adequate yearly progress” (AYP) determinations for all public schools and districts. NCLB further requires that states establish a system of “rewards and sanctions” applicable to all public schools and districts, including specific, escalating consequences for Title I schools and districts that do not meet AYP for consecutive years. In defining AYP, NCLB establishes several core requirements that states must follow. But NCLB also affords states important flexibility in defining AYP and integrating AYP into a broader state accountability system.
- **Prior State Accountability Systems:** Prior to NCLB, many states had existing accountability systems established under state law. NCLB requirements should build upon and strengthen these prior state systems, not undercut prior systems that were showing meaningful success in improving student achievement and closing achievement gaps.
- **State Status:** At this stage of NCLB implementation, all states have defined AYP, had their AYP Workbooks at least conditionally approved by the U.S. Department of Education (USED), and made AYP determinations for the first time based on 2002-03 data (as required by federal law). For many states, these AYP determinations constituted their overall state accountability determinations, while other states integrated AYP into broader state accountability systems. Each state now has the opportunity to reflect on its recent AYP/accountability determinations and consider refining its single statewide accountability system (including its definition of AYP) and/or establishing a broader system that can ensure the most valid and reliable accountability determinations consistent with the state’s specific education values and goals.
- **Purpose of the Blueprint:** This Blueprint provides a step-by-step process to help states build a “single statewide accountability system” with “rewards and sanctions” in a manner that meets NCLB requirements (acting within the current range of NCLB flexibility) and best serves each state’s education values and goals.¹
- **Key Steps for Building a Single Statewide Accountability System:**

The five key steps for building a single statewide accountability system include the following (each of which is discussed in detail in a section of this Blueprint, below):

- **Step #1: Understand the Role of Accountability**

¹ This Blueprint acts within existing NCLB requirements and the flexibility currently available. Each state’s accountability system should be designed to evolve as NCLB implementation and interpretation further develop (specifically with regard to AYP requirements). It is anticipated that this Blueprint will be updated as appropriate, to incorporate new flexibility, lessons learned, etc.

**Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004**

- **Step #2: Understand the Federal Legal Requirements**
 - **Step #3: Understand the State Context**
 - **Step #4: Establish Guiding Principles**
 - **Step #5: Address Four Key Design Questions Regarding Accountability**
- **State Proposal:** Based on these five steps and four key design questions (see Figure 1.), each state can develop a state-specific proposal for building a single statewide accountability system that meets NCLB requirements and best serves the state’s unique education values and goals. This Blueprint is thus designed to be able to literally become the written proposal for an individual state—reflecting that state’s unique context, analysis, and decisions.

**Four Key Design Questions
Related to Building a
Single Statewide Accountability System**

1. **AYP:** How should AYP be defined?
2. **State Criteria:** What additional state criteria should be considered?
3. **Integration:** How should AYP and state criteria be integrated?
4. **Rewards/Consequences:** What consequences should apply?

Figure 1.

Step #1: Understanding the Role of Accountability

First, it is important to understand the role of accountability (in terms of federal law and the broader state policy context). Accountability is—first and foremost—a key *education* strategy that is designed to help achieve broader education goals, particularly improving student achievement. Any effort to address federal or state legal requirements regarding accountability must begin from that fundamental educational foundation.

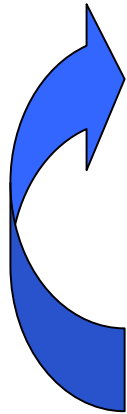
- **Federal Law and Accountability:** Properly understood and implemented, federal law in education, including NCLB, should reinforce sound state educational practices. Broadly speaking, federal law sets an agenda for state education reform and then requires that state actions be undertaken in a manner that is most educationally sound for all children, regardless of race, ethnicity, poverty, disability, limited English proficiency, etc. In terms of accountability, NCLB requires that states hold schools and districts accountable for all children achieving high standards. Thus, NCLB requires that states make annual AYP determinations for *all* public schools and districts, and that all students (and all groups of students) be included. But NCLB also recognizes that state accountability determinations must be valid and reliable.²
- **A Framework for Education Reform and Accountability:** Figure 2, below, presents a framework for understanding federal education reform and the role of accountability in that context. Most important, the framework seeks to distinguish broad educational goals and concrete objectives from the strategies that are designed to achieve those goals. The framework operates as a continuous process in its application—with state education goals and objectives driving education strategies and designs, which in turn are implemented, evaluated, and reviewed to make appropriate changes over time. Each step in the process is linked to the next by data and evidence.
- **The Role of Accountability—Toward a Theory of Action:** Understood in terms of this framework, accountability is not an end in itself; rather, it is a strategy that is designed to achieve broader state education goals and objectives.³ The theory of action, therefore, is that a state's accountability system must be designed to be *valid and reliable* in the sense that (1) performance indicators and decision rules, (2) lead to meaningful, consistent classifications, (3) which lead to appropriate educational interventions/consequences, (4) which lead to improved student achievement consistent with the state's education goals. Thus, in building a single statewide accountability system, each state must address several key design questions to develop an accountability system that is valid and reliable (consistent with the state's education goals), while using federal law as a guidepost to inform educational judgments and ensure compliance.

² Importantly, the concepts of validity and reliability do not operate like a light switch, but rather a spectrum. Thus, the question is not really whether a state's accountability system is valid and reliable as an absolute matter, but whether it is sufficiently valid and reliable given the purpose and importance of the educational judgments at issue.

³ The establishment of a single statewide accountability system that makes annual determinations of school and district performance is only one form of accountability, and accountability is only one strategy of education reform among many. It is crucial that all strategies and their multiple dimensions be integrated in a way that ensures that they are—individually and collectively—most efficient and effective.

A FRAMEWORK FOR EDUCATION REFORM: THE ROLE OF ACCOUNTABILITY

Each stage is linked to the next by data and evidence.



Stage	Definition	Issue: Accountability (Examples)
1. Goals	Non-operational, broad policy ends	<ul style="list-style-type: none"> ▪ Raise student achievement ▪ Close achievement gaps
2. Objectives	Concrete, measurable policy ends that lead to broader goals	<ul style="list-style-type: none"> ▪ X% proficient
3. Strategy	Broad-based theory of action/means to the ends	<ul style="list-style-type: none"> ▪ If schools/districts are accountable, then state goals/objectives will be promoted
4. Design	Concrete, detailed statement of the strategy	<ul style="list-style-type: none"> ▪ Define AYP; identify state criteria; determine integration model; choose rewards/consequences
5. Implementation	Application of the strategy/ design	<ul style="list-style-type: none"> ▪ Annual accountability determinations ▪ Application of rewards/consequences
6. Analysis/Evaluation	Consideration of evidence linking strategy/design to objectives/goals	<ul style="list-style-type: none"> ▪ Consideration of validity and reliability of accountability system
7. Review/Change	Amendments to strategy/design to better achieve objectives/goals	<ul style="list-style-type: none"> ▪ Revisions to accountability strategy/design

Figure 2.

Step #2: Understanding the Federal Legal Requirements

Second, it is important to understand the federal legal requirements regarding accountability, specifically NCLB requirements. In sum, the NCLB establishes two broad requirements related to state accountability systems:

- **Building a Single Statewide Accountability System:** First, NCLB requires that each state establish a “single statewide accountability system” that includes AYP determinations for *every* public school and district in the state.
 - AYP determinations must be based on (1) 95% participation on state assessments in reading/language arts and math, (2) the percentage of students scoring proficient or above on those state assessments, and (3) performance on at least one other academic indicator (which for high schools must be graduation rate). (Figure 3, below, provides more detail.)
 - For a school or district to make AYP, the school overall and each group of students above a minimum number (disaggregated by race, ethnicity, poverty, disability, and limited English proficiency) must make AYP.
 - Importantly, states may adopt “blended” accountability systems that consider AYP along with additional state criteria as part of state accountability determinations. However, states generally may not consider such data to mitigate AYP determinations except where AYP determinations are inconclusive (i.e., not sufficiently valid and reliable), such as in the case of small and rural schools or where a school’s performance falls within a confidence interval.
- **Establishing Rewards and Consequences:** Second, NCLB requires that each state establish “rewards and sanctions” applicable to *all* public schools and districts.
 - NCLB establishes a series of escalating consequences that apply to Title I *schools* that fail to meet AYP for consecutive years, including: after two consecutive years, school improvement plans, technical assistance, professional development, and public school choice; after three consecutive years, all of the above *plus* supplemental educational services; after four consecutive years, all of the above *plus* one or more corrective actions; and after six consecutive years, all of the above *plus* one or more actions related to restructuring/alternative governance. (Figure 4, below, provides more detail.)
 - NCLB establishes similar but less extensive requirements that apply to Title I *districts*, including: after two consecutive years, district improvement plans and technical assistance; and after four consecutive years, all of the above *plus* one or more corrective actions.
 - Importantly, most Title I consequences (with the possible exception of public school choice and/or supplemental educational services, for which it may depend on the state context) are likely consistent with existing and desired state and local consequences related to school performance. Most notably, both corrective action and restructuring are comprised of a broad menu of intervention options, and states may (within some limits) define that menu within federal law (e.g., adding consequences, moving up consequences, eliminating consequences, etc.).

Step #3: Understanding the State Context

Third, it is important to understand the specific state context regarding accountability.

- **Prior State Accountability Systems:** Prior to NCLB, many states had existing accountability systems established under state law. These state systems likely provide vital foundations on which future state accountability systems should be built. This is true for several reasons: (1) Each state context is unique, and the state accountability system should reflect those unique attributes; (2) existing state systems may reflect important state values and consensus that are important to success; (3) while educational systems and reforms always evolve, success may depend in part on staying the course and allowing systems to have an impact over time, etc.
- **NCLB Impact on State Accountability Systems:** NCLB accountability requirements should build upon and improve each state's existing accountability system—not undercut prior systems that were showing meaningful success in improving student achievement and closing achievement gaps. Indeed, the purpose of this Blueprint is largely to help states think about how to merge federal and state accountability systems, integrating federal and state accountability determinations and related consequences into a single statewide accountability system. Figure 3 and Figure 4 below, provide a Worksheet for comparing (side-by-side) the key NCLB accountability requirements and prior or current state accountability requirements. Figure 9, below, presents several models for integrating AYP and state accountability systems.

WORKSHEET FOR COMPARISON OF FEDERAL AND STATE ACCOUNTABILITY MEASURES

	Federal (NCLB)	Prior/Current State Accountability Measures
Measure	Federal AYP	State Accountability Determination(s)
Criteria	<p>AYP based on overall and subgroup performance in terms of:</p> <ul style="list-style-type: none"> § 95% participation on state assessments § Percent proficient on state assessments in reading/ language arts and mathematics § Performance on at least one other academic indicator <p>Examples of other criteria as defined in state AYP workbooks:</p> <ul style="list-style-type: none"> § Minimum number for subgroup accountability § Use of confidence intervals § Use of multi-year averaging 	<ul style="list-style-type: none"> § <i>What criteria were/are used for state accountability as a matter of state law/policy?</i> § <i>What criteria are included in accountability determinations versus reported only?</i> § <i>How is success measured?</i>
Possible Outcomes	<ul style="list-style-type: none"> § Met AYP § Did Not Meet AYP § Insufficient Validity/Reliability (e.g., based on confidence intervals; often considered to have Met AYP) 	<ul style="list-style-type: none"> § <i>What state classifications were/are used?</i>

Figure 3.

WORKSHEET FOR COMPARISON OF FEDERAL AND STATE CONSEQUENCES FOR SCHOOL/DISTRICT ACCOUNTABILITY

SCHOOL Status		Federal (NCLB) Title I Rewards and Sanctions	Prior/Current State Rewards and Consequences
Rewards	1 or More Years	<i>States are required to develop a system of rewards and may use federal funds to financially reward schools.</i>	§ <i>What rewards were/are in place? Based on what criteria?</i>
Consequences (Federal consequences based on: Did Not Make AYP)	After 1 Year		§ <i>What consequences were/are in place, over time? Based on what criteria?</i>
	After 2 Consecutive Years	Identified as in need of improvement and must: § Develop a school improvement plan § Receive technical assistance from LEA § Spend 10% of Title I funds on professional development § Offer public school choice w/in the district <i>May take corrective action (below)</i>	
	After 3 Consecutive Years	<i>The above plus:</i> § Provide supplemental educational services	
	After 4 Consecutive Years	<i>The above plus:</i> § Corrective action consistent with state law, including at least one of the following: replace appropriate school staff relevant to failure to make AYP; institute new curriculum; significantly decrease school management authority; appoint outside expert to advise school; extend school day or year; or restructure internal organization of school	
	After 5 Consecutive Years	<i>The above plus:</i> § Plan for restructuring (see below)	
	After 6 Consecutive Years	<i>The above plus:</i> § Restructuring/alternative governance consistent with state law, including at least one of the following: reopen as public charter school; replace school staff relevant to failure to make AYP; contract with an entity to operate the public school; turning operation of the school over to the state educational agency (SEA); or any other major restructuring that makes fundamental reforms and has substantial promise of enabling the school to make AYP	

Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004

DISTRICT Status		Federal (NCLB) Title I Rewards and Sanctions	Prior/Current State Rewards and Consequences
Consequences (Federal consequences based on: Did Not Make AYP)	After 2 Consecutive Years	Identified as in need of improvement and must: § Develop a district improvement plan § Spend 10% of Title I funds on professional development § Specify responsibilities of the SEA, including technical assistance the SEA will provide upon LEA request <i>May</i> take corrective action (below)	
	After 4 Consecutive Years	<i>The above plus:</i> § Corrective action consistent with state law, including at least one of the following: defer programmatic or reduce administrative funds; institute new curriculum; replace appropriate district staff relevant to failure to make AYP; remove particular schools from the district's jurisdiction and establish alternate public governance; appoint receiver or trustee in place of local superintendent and school board; abolish or restructure LEA; authorize students to transfer to higher-performing LEA and provide transportation	

Figure 4.

Step #4: Establishing Guiding Principles

Fourth, prior to working through the key specific design questions related to building a single statewide accountability system, it is important for each state to establish broader guiding principles that can help inform the specific design issues that must be addressed.

- **Guiding Principles for Accountability:** Guiding principles can help ensure that state accountability design decisions validly and reliably promote each state's broader educational goals. In other words, it is useful to begin by clearly stating what the state hopes to achieve in the design of its accountability system (i.e., what constitutes success) so that the specific design decisions can be tested against those values. The guiding principles will likely be interrelated—and closely related to the overarching goal of building a valid and reliable system in the sense that accountability determinations and interventions are meaningfully related to the educational goals of the state in improving student achievement. Ideally, the state would work to prioritize its guiding principles to some degree. This is important because, in many cases, the principles may be in tension with each other, requiring the state to balance its values. For example, the principle of devising a system that is most valid and reliable as a measure of school performance may need to be balanced with the principles of devising a system that is simple and understandable, or workable within existing capacity.
- **Examples of State Guiding Principles:** Recognizing that each state is unique and that several guiding principles likely overlap in substantial ways, the following are some guiding principles that have been used by several states in building a single statewide accountability system. For example, the state accountability system should:
 - **Student Achievement:** Improve teaching/learning and student achievement, consistent with the state's education goals;
 - **Accountability:** Result in valid, reliable determinations for accountability purposes at the school, district, and state levels, consistent with federal requirements;
 - **Fairness:** Set ambitious but attainable goals, and ensure that similarly situated schools, including Title I and non-Title I, are treated similarly;
 - **Clarity:** Be clear, understandable, and transparent to students, parents, teachers, administrators, the media, and the public;
 - **Promising Practices:** Lead to promising practices, within schools and among comparable schools (including scientifically based interventions and technical assistance);
 - **Progress/Growth:** Focus on progress and growth, as well as status performance;
 - **High Standards:** Promote appropriate, high standards and expectations for all students (and all groups of students);
 - **Continuous Improvement:** Recognize strengths and weaknesses, with a focus on continuous educational improvement, not punitive sanctions;
 - **Flexibility/Autonomy:** Promote local flexibility, with increasing state involvement based on underperformance over time;
 - **Capacity:** Take into account capacity and resources in terms of building a workable system with clear priorities;
 - **Integration:** Integrate accountability determinations and consequences with other educational resources and systems (to maximize efficiency and impact);
 - **Resiliency:** Be sustainable in the long-term while recognizing the need for continuous improvement and evolution over time.

Step #5: Addressing Four Key Questions on Accountability

Finally, with the above background in place, each state must address four key accountability design questions to build a single statewide accountability system with rewards and consequences that meets federal requirements and best serves state education goals.

- **Accountability Design Process:** There are four key questions related to building a single statewide accountability system. Each of these questions implicates multiple, specific design issues. These issues are presented in the design templates that follow (Figure 5 – Figure 8, below), which can be used to guide the state accountability design process. Importantly, answering the questions below will likely require a coordinated process, including input from multiple stakeholders, substantial data analysis, and more. To ensure the best results, each state likely should establish a multidisciplinary team and process to work through the templates that follow, including policy, legal, communications, etc., and to review the results and decisions over time.

- **Four Accountability Design Questions:**
 1. **Adequate Yearly Progress (AYP):** How should AYP be defined in your state, within the range of NCLB flexibility, to ensure the most valid, reliable determinations in the context of the state’s accountability system? (Per federal requirements, many of these design decisions may have already been addressed in each state’s AYP Workbook, which has been approved at least conditionally by USED. Those decisions can, however, be amended, if appropriate.⁴)
 2. **State Criteria:** What factors, if any, beyond AYP does your state care about in terms of making the most valid, reliable accountability determinations given your state’s education values and goals?
 3. **Integrated System:** How should AYP and the state criteria be integrated in your state to form a single statewide accountability system that will result in the most valid, reliable, and meaningful accountability determinations, consistent with your state’s education values and goals?
 4. **Rewards and Consequences:** What rewards and consequences should be established in your state to ensure that accountability determinations promote the state’s education goals, for both Title I and non-Title I schools and districts?

⁴ The U.S. Department of Education has established a deadline of April 1, 2004, by which states should submit amendments to their AYP Workbooks for use this year.

1. AYP Design Template

- § NCLB defines AYP with substantial specificity. For example, NCLB requires that each state make AYP determinations for *every* public school and district, and that those decisions be based on (1) 95% participation on state assessments in reading/language arts and math, (2) the percentage of students scoring proficient or above on state assessments, and (3) student performance on another academic indicator (which must be graduation rate for high schools). However, NCLB affords states meaningful flexibility on some AYP design decisions that can have an impact on AYP outcomes.

- § Many of these AYP design decisions likely have been addressed in the state’s AYP Workbook (which has been conditionally approved by USED). However, following the first year of AYP implementation, states may want to consider amending their AYP Workbooks to take advantage of additional flexibility and/or lessons learned to ensure that future AYP determinations are as valid and reliable as possible.

- § Figure 5, below, presents several key AYP design issues that should be considered.

SUMMARY OF AYP DESIGN ISSUES FOR STATE ANALYSIS

Issue	Options/Impact	State Analysis/Discussion
Choice of AYP assessment indicator(s)	States must identify the assessments that will be the primary indicators of AYP in reading/language arts and mathematics, and ensure that each assessment is valid, reliable, and aligned with state standards. The choice of assessment(s) can have a substantial impact on AYP.	
Use of confidence intervals	States may use confidence intervals to increase the validity and reliability of their AYP determinations. States may use confidence intervals at various levels and to varying degrees, depending on their broader accountability systems. The use of confidence intervals will generally reduce the number of schools that do not make AYP.	
Minimum number for subgroup accountability	States must establish a minimum number(s) for subgroup accountability that protects student privacy and helps ensure the validity and reliability of AYP decisions. Higher minimum numbers generally reduce the number of schools that do not make AYP. USED has recently expressed openness to proposals for establishing higher minimum numbers for students with disabilities, English language learners, and even school districts.	
Choice of additional indicator	High schools are required to use graduation rates as the other academic indicator for AYP, but states may determine what other academic indicator will be used for elementary and middle schools, and can even allow districts to choose from a menu of options.	

**Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004**

Issue	Options/Impact	State Analysis/Discussion
Intermediate goals/annual measurable objectives	States must set intermediate goals by which the AYP bar must rise at least once by 2004-05 and every 3 years thereafter. States can establish systems in which the AYP bar rises more in later years, delaying substantial increases until education reforms are implemented.	
Definition of full academic year	Only the scores of students who have attended a school or district for a “full academic year” are included in the school or district accountability determinations. States have flexibility in how they define “full academic year.”	
Use of multiple tests/administrations	Technically, only the “first administration” of an assessment can be counted in the AYP determination, but states can define what constitutes the “first administration,” and can “bank” prior scores for AYP purposes.	
Averaging data	NCLB allows states to average data (use “flip averaging”) to correct for anomalies in student assessment scores – looking at 2 or 3 years of data where a school does not make AYP based on 1 year of data.	
Use of index systems	Federal law requires that states focus on proficiency. But a few states have been allowed (and USED has recently expressed openness) to give value to moving students from below basic to basic as well.	
Independence of AYP indicators	Schools are only identified for improvement if they miss AYP for two consecutive years. States have the flexibility of defining this to mean missing AYP for two consecutive years <i>in the same subject/indicator</i> .	
Exit criteria for students with disabilities and LEP students	States must determine criteria for exiting ELL students and students with disabilities from their respective AYP subgroup definitions as appropriate. Some states include transition/monitoring programs for students until the student is fully exited, allowing the student’s score to remain in the AYP subgroup during that period. And USED has recently permitted states to exclude from AYP the scores of ELL students in their first year in US schools and to include in the ELL subgroup scores of students who exited ELL w/in the prior 2 years.	
Use of non-AYP data for small schools	In many states, there are whole schools that do not have enough test scores to meet the minimum number for accountability. In this case, states have flexibility to determine what process they will use make an AYP determinations for those school.	
Other		

Figure 5.

2. State Criteria Design Template

- § AYP, as defined under NCLB, focuses primarily on the *absolute* (or status) performance of students in reading/language arts and math based on the percentage of students achieving “proficiency” on state assessments (with some focus on progress in terms of both “safe harbor” and increases in the statewide AYP bar over time). This information is important, but it may not tell the full story with regard to school performance.
- § Some states may choose to make AYP the totality of the state’s single statewide accountability system, incorporating state values and goals into the AYP framework (e.g., by defining the “other academic indicator” for AYP to reflect key state criteria). Other states may want to consider whether including additional state criteria in a single statewide accountability system would result in more valid and reliable accountability determinations, including distinctions among schools with similar AYP performance, consistent with state education values and goals.
- § Figure 6, below, presents several key design issues regarding additional state accountability criteria.

SUMMARY OF STATE CRITERIA DESIGN ISSUES FOR STATE ANALYSIS

Issue	Options/Impact	State Analysis/Discussion
Role of progress; use of school-based starting points/trajectories	NCLB focuses most directly on status performance, and requires states to establish statewide starting points for AYP. States may also be interested in setting starting points and achievement goals for individual schools/groups based on their current performance and progress over time.	
Use of student/cohort, value-added, longitudinal, growth models	In addition to the yearly “snapshot” of school/district achievement that AYP provides, states may also be interested in measuring individual student or cohort progress of the same students over time. This approach at measuring progress can correct for shortcomings in NCLB’s “safe harbor,” which to date measures progress based on different cohorts (e.g., this year’s fourth grade versus last year’s fourth grade).	
Use of index systems	NCLB focuses on <i>proficiency</i> on assessments (w/ some limited flexibility). States may want to give value to moving students forward at all levels of achievement (e.g., from below basic to basic or from proficient to advanced on assessments).	

**Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004**

Issue	Options/Impact	State Analysis/Discussion
Inclusion of additional subjects	NCLB measures student achievement on reading/language arts and mathematics. States may also be interested in including student achievement in other subject areas (e.g., science or social studies).	
Inclusion of additional “outcome” indicators	NCLB focuses primarily on state assessments. States may also be interested in tracking other “outcome” indicators and reporting them and/or including them in accountability determinations.	
Inclusion of “input” indicators	NCLB focuses on student achievement outcomes. Some states may also be interested in including and/or reporting other “input” indicators that can affect student achievement.	
Other		

Figure 6.

3. Integration Design Template

- § AYP must be part of a state’s single statewide accountability system, and states generally may not use additional data to mitigate AYP determinations. However, states can consider additional data in making overall state accountability determinations by combining AYP and state criteria in an overall statewide accountability system. Figure 9, below, presents several models that states are currently using to integrate AYP and state accountability determinations.
- § States may want to consider whether and how to integrate AYP and state criteria, as a matter of law, policy, communication, etc.
- § Figure 7, below, presents several key design issues regarding integration of AYP and state criteria.

SUMMARY OF INTEGRATION DESIGN ISSUES FOR STATE ANALYSIS

Issue	Options/Impact	State Analysis/Discussion
Role of AYP in overall system; integration of AYP and state determinations	There are several options for the way that AYP can be integrated into the overall state accountability system in combination with state criteria: § AYP is the ultimate accountability determination (based on federal and/or state criteria); § AYP is one determination, with an additional state determination(s); or § AYP is integrated with state criteria to produce a single determination based on state labels.	
Differentiation of missing AYP for some versus all groups/indicators	States may be interested in distinguishing among schools and districts based on level of performance within AYP or the performance of schools or districts on additional state criteria. For example, for schools that do not make AYP, several states report the number and/or percentage of cells for which a school met AYP performance requirements. The addition of a state measure beyond AYP can promote further distinctions (e.g., between a school that did not make AYP and is not making progress based on state criteria versus a school that did not yet make AYP but is making strong progress based on state criteria).	
Consistency between decisions based on AYP and state criteria	Some states value consistency between AYP and state criteria. Other states have determined that their state criteria are sufficiently different from and complimentary to AYP such that it makes sense to have two different determinations based on the different criteria.	

Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004

Issue	Options/Impact	State Analysis/Discussion
Communication of accountability determinations; labels for levels of performance	In addition to policy considerations, the challenge of integrating federal and state accountability determinations is one of communication – creating a system that is understandable and supportable by multiple stakeholders. Some states use multiple state labels to communicate school performance, rather than simply reporting whether a school made AYP or did not meet AYP.	
Other		

Figure 7.

4. Rewards and Consequences Design Template

- § NCLB requires that states establish a system of “rewards and sanctions” that includes all public schools and districts, and NCLB establishes specific, escalating consequences for Title I schools (and districts) that do not make AYP. Importantly, these consequences generally mirror those of many existing state systems that apply to all schools (and districts) (with the possible exceptions of public school choice and/or supplemental educational services).
- § States must consider how to construct a system of rewards and consequences that applies to both Title I and non-Title I schools and districts.
- § Figure 8, below, presents several key design issues regarding rewards and consequences.

SUMMARY OF REWARDS AND CONSEQUENCES DESIGN ISSUES FOR STATE ANALYSIS

Issue	Options/Impact	State Analysis/Discussion
Integration of Title I and non-Title I consequences	NCLB requires specific, escalating consequences for Title I schools. Many states have determined that a guiding principle is consistency in the rewards and consequences between Title I and non-Title I schools, and that the federal mandatory consequences are generally consistent with state systems applicable to all schools.	
Moving up required Title I consequences	Some states have moved up certain required consequences, such as technical assistance and school improvement plans, in an effort to be proactive and preventative.	
Restricting Title I options for corrective action/restructuring	NCLB requires corrective action or restructuring for schools after consecutive years of missing AYP, but NCLB gives states the ability to limit the types of corrective action or restructuring allowable. Several states have restricted or eliminated the option of state takeover, for example.	
Adding consequences beyond Title I requirements	NCLB establishes certain requirements and options for Title I schools that do not make AYP, but states may want to add additional requirements (e.g., an independent audit for schools that fail to meet AYP for consecutive years).	

**Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004**

Issue	Options/Impact	State Analysis/Discussion
Determining state versus local control w/ regard to consequences	Some states are establishing clear categories of consequences that are determined at the state level. Others are giving local systems a range of options and the authority to determine which consequences are appropriate for individual schools, at least in the early years of underperformance.	
Establishing rewards	NCLB provides substantial flexibility in terms of rewards, which may include (1) recognition, (2) increased flexibility/autonomy, and/or (3) financial awards.	
Dealing with limited capacity /resources	Given resource limitations, it is likely important that states set priorities regarding rewards and consequences, focusing on the highest and lowest performing schools, respectively.	
Other		

Figure 8.

MODELS FOR INTEGRATING AYP AND STATE CRITERIA INTO A SINGLE STATEWIDE ACCOUNTABILITY SYSTEM (SSAS)

Integration Model					Explanation of Model
MODEL #1					Some states use AYP as the sole source of their SSAS determinations. A school or district is determined to have made AYP under the SSAS unless the state determines to a certain degree of confidence that a school or district did <i>not</i> meet AYP. (Note: Even under this model, many states may incorporate important state criteria into AYP—to the extent possible—by using such criteria as the “other academic indicator” for AYP.)
AYP		STATE CRITERIA		SSAS DETERMINATIONS	
Yes		N/A		Yes	
Maybe⁵	+	N/A	=	Yes	
No		N/A		No	
MODEL #2					Some states use state criteria in addition to AYP. First, they determine AYP; then they look at state criteria and give schools an additional rating(s), which can be integrated into an overall SSAS determination. Several states using this system have adopted decision rules to ensure consistency between AYP and state criteria. (Note: Some states may use additional state criteria as a second-tier in their accountability systems; some states may use AYP together with other state data in reaching an accountability determination (recognizing that certain consequences will apply to Title I schools that miss AYP, regardless of other state data).)
AYP		STATE CRITERIA		SSAS DETERMINATIONS	
Yes		High		Excellent-Good/Fair	
Maybe	+	Moderate	=	Excellent -Poor	
No		Low		Good/Fair -Poor	
MODEL #3					Some states are using confidence intervals to a greater degree to make their AYP systems as valid and reliable as possible. The result is that a larger group of schools and districts falls into the “maybe” category in AYP. The state then makes its SSAS determination for these schools based primarily on state criteria.
AYP		STATE CRITERIA		SSAS DETERMINATIONS	
Yes		N/A		Yes	
Maybe	+	High-Low	=	Yes No	
No		N/A		No	

Figure 9.

⁵ NCLB requires an AYP determination (Yes or No) for each school and district. “Maybe,” in this context, refers to situations where the AYP determination was inconclusive—not sufficiently valid and reliable—such as in the case of small and rural schools or where a school’s performance falls within a confidence interval. Ultimately, an AYP determination MUST be made for every public school and district.

Proposal

Following the process and conducting the analysis above, each state will be able to develop and present its state-specific proposal for establishing a single statewide accountability system that meets NCLB requirements and best serves the state's education values and goals. In this sense, each state can literally commit to paper its state-specific ideas and turn this Blueprint into a state-specific proposal. Figure 10 and Figure 11 provide Worksheets for summarizing the state analysis along with the relevant federal requirements.

- **AYP:** [Summarize analysis and outcomes from AYP Design Template. (Pages 14-15, above.)]
- **State Criteria:** [Summarize analysis and outcomes from State Criteria Design Template. (Pages 16-17, above.)]
- **Integration:** [Summarize analysis and outcomes from Integration Design Template. (Pages 18-19, above.)]
- **Rewards and Consequences:** [Summarize analysis and outcomes from Rewards and Consequences Design Template. (Pages 20-21, above.)]

SUMMARY OF PROPOSED AYP, STATE, AND INTEGRATED ACCOUNTABILITY DETERMINATIONS

	I AYP	+	II State Criteria	=	III Accountability Determination(s)
Key Question	<ul style="list-style-type: none"> ▪ How should AYP be defined (beyond core requirements)? 		<ul style="list-style-type: none"> ▪ What additional state criteria should be included in accountability determinations? 		<ul style="list-style-type: none"> ▪ How should AYP and state criteria be integrated?
State Analysis <i>What criteria?</i>	<ul style="list-style-type: none"> ▪ 95% participation ▪ Percent proficient ▪ Performance on another academic indicator ▪ Overall and group performance 				
<i>What outcomes?</i>	<ul style="list-style-type: none"> ▪ Made AYP ▪ Inconclusive (?) ▪ Did Not Make AYP 				

Figure 10.

SUMMARY OF PROPOSED REWARDS AND CONSEQUENCES FOR SCHOOL (AND DISTRICT) ACCOUNTABILITY

SCHOOL Status		Federal (NCLB) Title I Rewards and Sanctions	Overall State Rewards and Consequences
<i>Rewards</i>	<i>1 or More Years</i>	<i>States are required to develop a system of rewards and may use federal funds to financially reward schools.</i>	
Consequences	After 1 Year		
	After 2 Consecutive Years	Identified as in need of improvement and must: § Develop a school improvement plan § Receive technical assistance from LEA § Spend 10% of Title I funds on professional development § Offer public school choice w/in the district <i>May take corrective action (below)</i>	
	After 3 Consecutive Years	<i>The above plus:</i> § Provide supplemental educational services	
	After 4 Consecutive Years	<i>The above plus:</i> § Corrective action consistent with state law, including at least one of the following: replace appropriate school staff relevant to failure to make AYP; institute new curriculum; significantly decrease school management authority; appoint outside expert to advise school; extend school day or year; or restructure internal organization of school	
	After 5 Consecutive Years	<i>The above plus:</i> § Plan for restructuring (see below)	
	After 6 Consecutive Years	<i>The above plus:</i> § Restructuring/alternative governance consistent with state law, including at least one of the following: reopen as public charter school; replace school staff relevant to failure to make AYP; contract with an entity to operate the public school; turning operation of the school over to the state educational agency (SEA); or any other major restructuring that makes fundamental reforms and has substantial promise of enabling the school to make AYP	

Blueprint for Building a Single Statewide Accountability System
Version #1/February 2004

DISTRICT Status		Federal (NCLB) Title I Rewards and Sanctions	Overall State Rewards and Consequences
Consequences	After 2 Consecutive Years	Identified as in need of improvement and must: § Develop a district improvement plan § Spend 10% of Title I funds on professional development § Specify responsibilities of the SEA including specifying the technical assistance the SEA will provide upon LEA request May take corrective action (below)	
	After 4 Consecutive Years	<i>The above plus:</i> § Corrective action consistent with state law, including at least one of the following: defer programmatic or reduce administrative funds; institute new curriculum; replace appropriate district staff relevant to failure to make AYP; remove particular schools from the district's jurisdiction and establish alternate public governance; appoint receiver or trustee in place of local superintendent and school board; abolish or restructure LEA; authorize students to transfer to higher-performing LEA and provide transportation	

Figure 11.

About the Authors/Acknowledgments

- **About the Authors:** This Blueprint was produced by Scott R. Palmer and Arthur L. Coleman, both Counsel at Nixon Peabody LLP in Washington, D.C., where they focus on preventive law and policy in education—counseling state education leaders on how to meet their education goals in legally sound ways. Messrs. Palmer and Coleman work with CCSSO and individual states on a wide array of standards-reform issues, including those associated with the No Child Left Behind Act of 2001, high-stakes testing, and services for English language learners and students with disabilities. Messrs. Palmer and Coleman served, back-to-back, as Deputy Assistant Secretary for Civil Rights in the U.S. Department of Education, where their portfolios included federal compliance and discrimination issues arising in the context of standards reform, testing, resource adequacy, diversity/desegregation, and more. Messrs. Palmer and Coleman can be reached at (202) 585-8000 or via the Nixon Peabody website at www.nixonpeabody.com.
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