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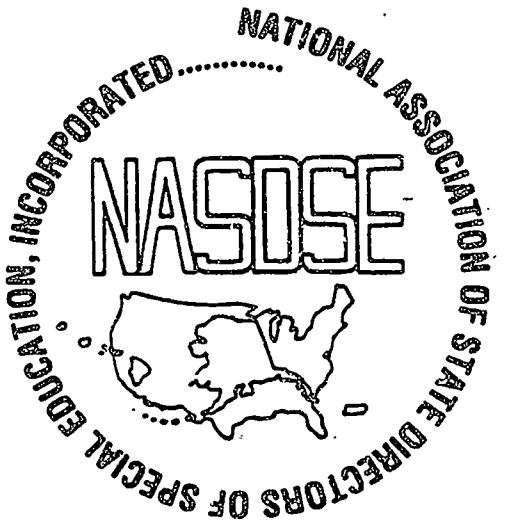
ABSTRACT

This document reports on a focus group meeting convened by the National Association of State Directors of Special Education (NASDSE) Board of Directors to examine the concept of educational accountability for all students, including students with disabilities. The outcome of the meeting was a definition of "accountability" and a conceptual model of educational accountability, which has its theoretical basis in the concept of the "social process triangle" and which includes three components: (1) inputs and processes (to guarantee educational equity), (2) system results (to guarantee program effectiveness), and (3) individual student learning (to guarantee individual student achievement). The current unbalanced status of educational accountability is described. The report concludes that a process must be undertaken to regain the balance in accountability with the cooperative involvement of all relevant constituencies. Most of the document consists of background materials, including the following papers: "Learner-Based Accountability: Making Schools Work for All Students" (Mary Ann Lachat); "State Compliance Monitoring Practices: An Update" (Eileen M. Ahearn); "A Framework for Accountability: Concepts, Approaches, and Issues" (Edward J. McCaul); "State Education Accountability Reports, Indicator Reports, and Report Cards" (Rolf K. Blank); and "Don't Test, Don't Tell" (Bill Zlatos). Model diagrams complete the report. (DB)

REPORT OF ACCOUNTABILITY FOCUS GROUP

Convened February 24 - 26, 1995
at the
Olympus Hotel, Salt Lake City, Utah



Final Report
Year 3 Deliverable #7-3-4
Under Contract No. HS92015001
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Prepared for:
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Prepared by:
Project FORUM

National Association of State Directors of Special Education
1800 Diagonal Road, Suite 320
Alexandria, VA 22314

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Gail Lieberman, Assistant Superintendent,
Illinois State Board of Education

Fred Smokoski, Director of Special Education Services Unit,
Colorado Department of Education

Diane Sydoriak, Associate Director of Special Education
Arkansas Department of Education

Pam Kaufmann, State Director of Special Education
Massachusetts Department of Education

David Noble Stockford, Director of Division of Special Education
Maine Department of Education

Hal Hayden, State Director of Special Education
Kentucky Department of Education

John Corpolongo, Executive Director of Special Education Section
Oklahoma Department of Education

Jill Gray, Senior Director of Special Education Unit
Texas Education Agency

Richard Baldwin, State Director of Special Education Services
Michigan Department of Education

Steve Kukic, Director of At-Risk and Special Education Services
Utah State Office of Education

Martha Brooks, State Director of Division of Exceptional Children
Delaware Department of Public Instruction

Kay Lund, Deputy Associate Superintendent, Special Education
Arizona Department of Education

Bill East, Director of Division of Special Education Services
Alabama Department of Education

Wayne Erickson, Manager of Bureau of Special Services
Minnesota State Department of Education

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ABSTRACT

This document is a report of a focus group meeting convened by the National Association of State Directors of Special Education (NASDSE) Board of Directors in February, 1995, to examine the concept of educational accountability for all students including students with disabilities. Meeting participants included the eight State Directors of Special Education who comprise the NASDSE Board, six additional State Directors each representing a different region of the country, NASDSE staff, and a facilitator.

The outcome of the meeting is a conceptual model of educational accountability that includes three components: inputs and processes, system results, and individual student learning. The report explains the theoretical basis of the model, the component parts, and the ways in which each element is related to each other element. The current unbalanced status of educational accountability is also described.

The report concludes that a process must be undertaken to regain the balance in accountability with the cooperative involvement of all relevant constituencies.

FOREWORD

This report is the result of a study done under Project FORUM, a contract funded by the Office of Special Education Programs of the U. S. Department of Education and located at the National Association of State Directors of Special Education (NASDSE). Project FORUM carries out a variety of activities that provide information needed for program improvement, and promote the utilization of research data and other information for improving outcomes for students with disabilities. The project also provides technical assistance and information on emerging issues, and convenes small work groups to gather expert input, obtain feedback, and develop conceptual frameworks related to critical topics in special education.

This activity is part of a series of Project FORUM tasks related to the topic of compliance monitoring in special education. The purpose of this brief analysis is to document the substance of a focus group meeting held by the National Association of State Directors of Special Education to design the initial structure of an articulated model of accountability in education. It was planned in response to a perceived need to reconsider the monitoring process in special education and to incorporate responsibility for the progress and outcomes of students with disabilities into a comprehensive accountability system for education.

REPORT OF A FOCUS GROUP ON ACCOUNTABILITY

INTRODUCTION

Background and Purpose of the Meeting:

The focus group meeting was planned and conducted by the Board of Directors of the National Association of State Directors of Special Education (NASDSE). Support for the meeting was provided by Utah State University through the efforts of Glen Latham, Director of the Mountain Plains Regional Resource Center (MPRRC). A copy of the agenda is included in this report as Appendix A.

Participants: In addition to the NASDSE Board of Directors who convened the meeting, participants included one State Director representing each Regional Resource Center, the NASDSE Executive Director, a Project FORUM staff member, and the meeting facilitator. The list is as follows:

State Directors of Special Education:

Bill East, AL
Diane Sydoriak, AR
Kay Lund, AZ
Fred Smokoski, CO
Martha Brooks, DE
Gail Lieberman, IL
Hal Hayden, KY
Pam Kaufmann, MA
David Stockford, ME
Richard Baldwin, MI
Wayne Erickson, MN
John Corpolongo, OK
Jill Gray, TX
Steve Kukic, UT

Other Participants:

Martha Fields, NASDSE
Glen Latham, Utah State University & MPRRC
Mae Taylor, UT Department of Education
Marilyn Crocker, Facilitator
Eileen Ahearn, Project FORUM at NASDSE

Purpose of the Meeting:

The overall goal of the focus group was to develop a shared vision of accountability. This goal was clarified in pre-meeting documents in terms of six anticipated outcomes:

1. A shared understanding of the differences among input/process accountability, results-based accountability, and the accountability for individual student performance and due process;
2. A shared understanding of the need for a multi-component and multi-level articulated model of accountability;
3. A shared understanding of the need for multiple stakeholder roles and responsibilities in the implementation of a comprehensive articulated model of accountability;
4. A shared understanding of the relationship between an accountability system for the education of students with disabilities, and the broad-based systems of accountability that undergird states' educational reform efforts;
5. Initial ideas about how best to report nationally the status of the education of students with disabilities so that the creation of a unified system of accountability is prompted; and,
6. A plan for sharing and refining the initial understandings and vision that are developed as a result of this meeting with other stakeholders.

The meeting was conceived as the next step in a process begun with the following efforts:

- A meeting on monitoring convened by Dr. Tom Hehir in January, 1994 that engaged key stakeholders in an initial discussion related to the federal monitoring process;

- The *National Agenda for Achieving Better Results for Children and Youth with Disabilities* developed in June, 1994 that developed a vision statement that called for strategic actions to implement accountability systems that monitor program effectiveness, balancing process with results; and,

- The Third National Monitoring Conference held in November, 1994 at which information was shared on the status of both federal monitoring of states and state monitoring of school districts.

Background Materials:

Prior to the meeting, participants were provided with some materials related to the topic of accountability and a preliminary version of an articulated model. The background documents (incorporated as Appendix B of this document) included:

- A briefing paper for the Accountability Focus Group that includes a copy of the preliminary model for consideration at the meeting;
- Notes from Tom Hehir's presentation at the Third National Monitoring Conference in November, 1994;
- A monograph prepared for the Northeast Regional Resource Center by Mary Ann Lachat entitled, *Learner-Based Accountability: Making Schools Work for All Students.*
- A draft report from Project FORUM entitled *State Compliance Monitoring Practices: An Update*;
- A 1993 paper by Edward McCaul entitled *A Framework for Accountability: Concepts, Approaches, and Issues*
- An inventory of state accountability reports prepared by the Council of Chief State School Officers entitled *State Education Accountability Reports, Indicator Reports, and Report Cards*;
- A brief summary of the new accountability structure for Title I under the new Improving America's Schools Act; and,
- A copy of the article, "Don't Test, Don't Tell", from the November, 1994 issues of *The American School Board Journal.*

Process of the Meeting:

After introductory remarks by Gail Lieberman covering the purpose and goals of the meeting, the facilitator led a discussion that covered each participant's expected outcomes of the meeting and an initial set of ground rules for subsequent sessions.

The first topic of discussion was a definition of accountability. Then, the facilitator presented a conceptual framework for the development of the draft model of accountability. Using the framework, the participants spelled out the three primary components of the draft model of accountability, discussed the profound function of each, and identified a list of examples to illustrate each component.

The major emphasis of the second day was a detailing of the dynamical relationships between and among the three components of the accountability model using a combination of large group and individual work. A set of specific action steps was devised and placed on

a calendar. Specific assignments were made for sharing the approach with various constituencies, starting with a scheduled meeting between the NASDSE Executive Director and Tom Hehir, Director of the Office of Special Education Programs of the U.S. Department of Education. Plans were made to obtain input from various groups on the model as a first step in the process of movement toward the balance represented by the vision. This action plan was reviewed and finalized by the NASDSE Board before the end of the meeting.

The meeting closed with a discussion about the meeting outcomes and a commitment to the action plan.

OUTCOMES OF THE MEETING

Accountability in Education

Consensus was reached on the meaning of accountability in education as a result of focus group discussions and the vision from the National Agenda. The following statement represents that consensus:

> *Accountability* is the process by which we take account of what we intend; a measuring and diagnosing; being answerable for something; a way of ensuring that children are making progress toward appropriate outcomes, both cognitive and non-cognitive.

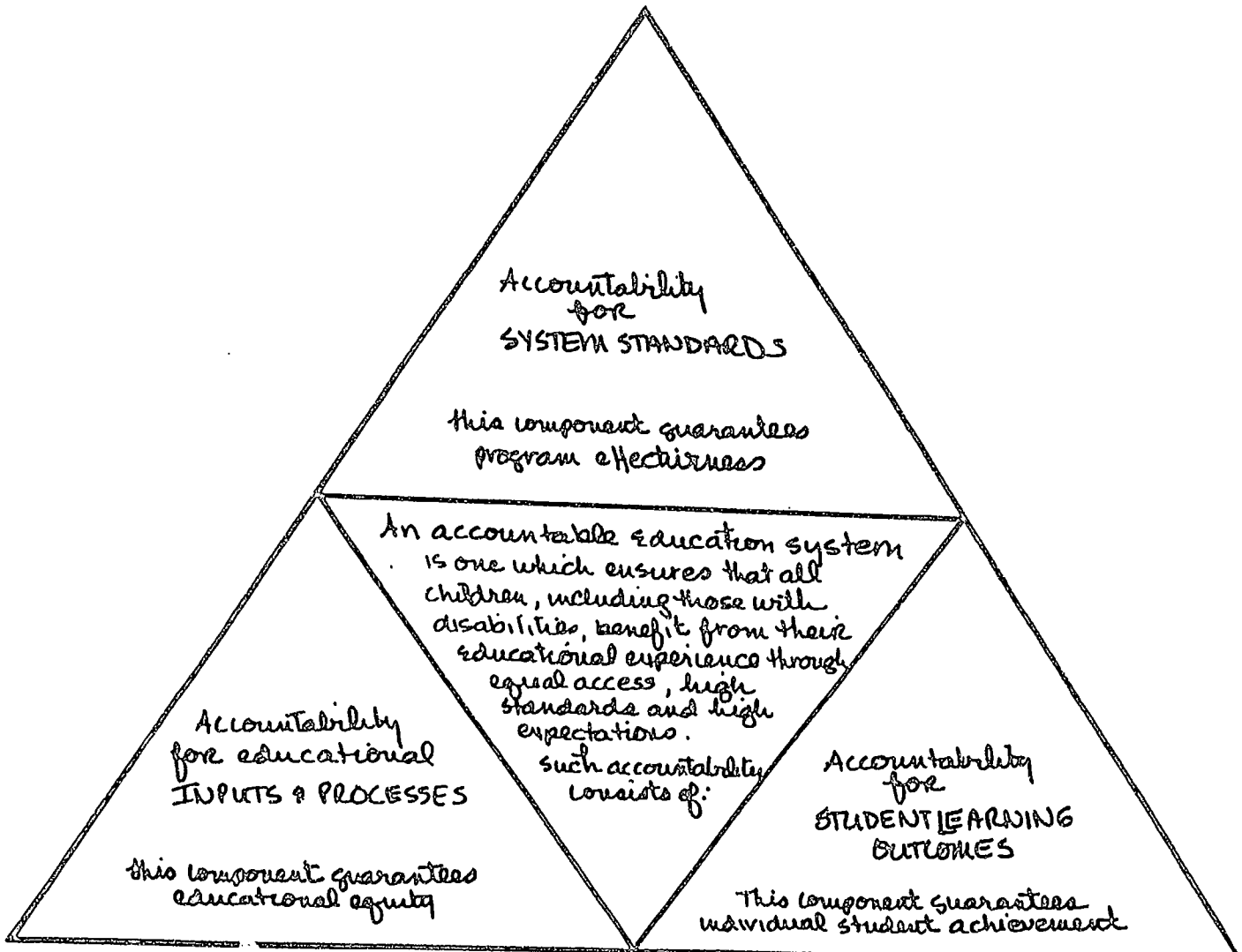
Educators are accountable to families and parents, elected officials, and to the public in general.

The conceptual framework chosen to represent accountability is based on a dynamic balance between and among the three major components of the accountability system. The pivotal concept for the model is described as follows:

> The *vision for balanced accountability* is an educational system which is accountable for ensuring that all children, including those with disabilities, benefit form their educational experience through equal access, high standards and high expectations, and become caring, productive, socially involved citizens who are committed to life-long learning.

A model of accountability based on these concepts was developed during the remainder of the meeting. It is illustrated on the next page and discussed in the following section.

A DYNAMIC MODEL OF ACCOUNTABILITY FOR EDUCATION



Conceptual Framework of the Model

The conceptual framework used to devise the model of accountability is known as the social process triangle described in the book, *The Social Dynamics of Humanness*, issued by the Institute of Cultural Affairs of Chicago in 1970. This model involves viewing a social process in terms of its three fundamental components: its economic or foundational aspect; its political or organizational aspect; and its cultural or meaning-giving aspect. In an ideal state, each of the three poles of the triangle is robust and performs its unique function to provide balance. Often in reality, however, a relative imbalance prevails with one pole often assuming dominance and functioning as a kind of "tyrant," a second pole supporting the dominant one in an "ally" relationship, and the third pole manifesting a "collapsed" state.

Once the dysfunction has been recognized, achieving balance requires re-empowering the collapsed pole. This can be accomplished by working directly to revitalize its functions, and revitalization is often accomplished by re-directing the ally away from supporting the dominant role. In order to move toward balance, it is helpful to understand the "profound function" or unique contribution of each component as well as the nature of the relationships between and among the components.

This theoretical framework was used by the focus group participants to develop a dynamic model of educational accountability.

Components of the Educational Accountability Model

In terms of educational accountability, the three components of the model that must be balanced and the unique function of each is as follows:

- ***Inputs and Processes*** *guarantees educational equity.* Examples of this component include (but are not limited to) the following: IEP; LRE; access standards; procedural safeguards; parent involvement; staffing credentials; finance/funding; staff development; policy development; diversity; IDEA; MIS; demand for use of effective practice.

- ***System Results*** *guarantees program effectiveness.* Examples of this component include (but are not limited to) the following: standards; blended system; curriculum; ongoing measurement; multiple measures of system effectiveness; continuous improvement including baseline data, longitudinal studies, multiple indicators such as dropouts, retention, completion; cognitive and non-cognitive; staff development; flexibility

and accessibility to program; appropriate reinforcements, sanctions, incentives; school report cards; MIS; state, district, school strategic plan.

- ***Individual Student Learning*** *guarantees individual student achievement.* Examples of this component include (but are not limited to) the following: parent involvement; teacher empowerment; IEP; academic/non-academic standards; individual expectations both cognitive and non-cognitive; multiple measures of individual student progress; MIS; flexibility in assessment modes; continuous progress with benchmarks along the way.

The relational dynamics among and between these three components of educational accountability provide the potential for a balanced system when *each* component functions in a *robust* manner, and there is no expansion of any one of the elements of accountability to the impairment of any other element. (See Appendix C for diagrams of the model as balanced and unbalanced.)

A study of accountability in education, especially as it relates to special education, reveals the following current status:

- the *inputs and processes* leg of the triangle, in the form of compliance monitoring, has usurped the entire function of accountability thereby becoming a tyrant in terms of this model;

- the *system results* component of accountability has acquiesced to that tyrant as an ally by allowing the exclusion of students with disabilities from district assessments; and,

- there has been no accountability for individual student outcomes leaving no role for the collapsed accountability component of *individual student learning*.

The appropriate *dynamic relationship* of any one component to each of the other components can be described in terms of three basic relational categories: what that component **creates** for each of the other components, what it **limits** for each of the other components, and what it **sustains** for each other component. A review of these functions portrays the essential interrelationship among the components that interact on each other to establish and maintain balance. A few examples of the factors that constitute these relational dynamics for the educational accountability model were developed and are presented in the next section.

Dynamic Relationships Within the Model

The following is a list of examples of the interrelationships among all the components of the dynamic model of educational accountability:

A) The relationship enacted by the *first* component, **Rights, Inputs and Processes**, in reference to the *second* component, System Results is as follows:

It creates: It provides reliable, valid data to inform system configuration.
It limits: It defines boundaries for opportunities and flexibility.
It sustains: It reinforces/renews resources for systems.

The relationship enacted by the *first* component, **Rights, Inputs and Processes**, in reference to the *third* component, Individual Student Learning is as follows:

It creates: It establishes tools necessary to support and facilitate learning.
It limits: It requires opportunity for each and all.
It sustains: It strengthens emphasis on individualization and parent involvement.

B) The relationship enacted by the *second* component. **System Results**, in reference to the *first* component, Rights, Inputs and Processes, is as follows:

It creates: It shapes inputs required to achieve results.
It limits: It demands constant renewal of inputs/process measures.
It sustains: It ensures continuity and consistency of inputs across populations.

The relationship enacted by the *second* component, **System Results**, in reference to the third component, Individual Student Learning, is as follows:

It creates: It demands high expectations for teaching and learning.
It limits: It requires connection between what we know about a child and instructional strategies.
It sustains: It strengthens emphasis on individual learning.

C) The relationship enacted by the *third* component, **Individual Student Learning**, in reference to the first component, Rights, Inputs and Processes, is as follows:

It creates: It derives the inputs/processes (creates context and purpose).
It limits: It demands individualized instruction.
It sustains: It supports continuous improvement and ongoing match.

The relationship enacted by the *third* component, **Individual Student Learning**, in reference to the second component, System Results, is as follows:

It creates: It forces the system to assume ownership for all children.
It limits: It guards against over-generalization of system results.
It sustains: It validates system standards.

CONCLUSION

A model of dynamically balanced accountability for education is obviously complex, requiring shared roles and responsibilities of multiple stakeholder groups in many different configurations including local, state and national, as well as classroom, school and district levels. Such stakeholder groups include—but are not limited to—the following: children and youth, parents and families, advocates, general and special education administrators, general and special education teachers and specialists, the business community, legislators, boards of education, higher education, associations, and other service agencies.

It is the responsibility of all relevant constituencies working individually and together to establish and maintain a balanced approach to educational accountability. The first step in this process must be a complete review of compliance monitoring, putting it into an appropriate perspective at the federal and state and local levels while, at the same time, moving toward the complete incorporation of students with disabilities into evaluations of school system results. Initial steps taken in the last few years to assess and improve individual outcomes for students with disabilities is a third—and equally critical—component of the strategy needed to achieve a balanced approach to educational accountability. It is only through an exhaustive review and revision of every component of accountability that a new paradigm can be constructed that will provide a balanced and complete portrait of the performance of public education in the United States.

APPENDIX A: Agenda

AGENDA

FOCUS GROUP TO EXPLORE AN ARTICULATED MODEL OF ACCOUNTABILITY FOR THE EDUCATION OF STUDENTS WITH DISABILITIES

February 24-26, 1995

FRIDAY:

1:00 - 1:15 **Welcome and Introductions:** Martha Fields

1:15 - 1:45 **Purpose and Overview:** Gail Lieberman

1:45 - 3:00 **Background:** Marilyn Crocker

A. Consensus on meeting outcomes
B. Agreement about meeting guidelines and ground rules
C. Review and discussion of background reading materials

3:00 - 3:15 **BREAK**

3:15 - 6:00 **Task One: Clarifying the Components of the Model**
{This activity will take place as a full group session}

A. What are the key elements of the model?
B. What are the functions of each element?
C. What is the unique contribution of each element?

7:00 **DINNER**

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SATURDAY

8:00 - 8:30 **BREAKFAST**

8:30 - 9:00 **Framing the task for today:**

Task Two: Clarifying the Dynamics of the Model
{This task will also take place as a full group session}

What is the dynamic relationship between each component and each other component, and between each component and the whole system in terms of three basic relational categories:

9:00 - 10:30 A. What does each component create (provide, stimulate, enhance, etc.) relative to each of the other component s and relative to the whole system?

10:30 - 10:45 **BREAK**

10:45 - 12:00 B. What does each component limit (define, delineate, demand, etc.) relative to each other component and to the whole system?

12:00 - 1:00 **LUNCH**

1:00 - 2:30 C. What does each component sustain (ensure, reinforce, represent, etc.) relative to each of the other components and to the whole system?

2:30 - 2:45 **BREAK**

2:45 - 4:00 **Task Three: Exploring the Roles and Responsibilities of Stakeholder Groups in the Implementation of a Comprehensive Accountability System**

{This activity will take place in three small groups each representing a particular stakeholder level---national, state, local—and will begin the identification of the ongoing tasks to be performed and the resources required for each level.}

4:00 - 6:00 **Plenary Reporting Session**: following reports from each of the three working groups to the group as a whole, participants will reflect on how each stakeholder level can specifically contribute to the work of the other two levels.

7:00 **DINNER**

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SUNDAY

8:00 - 8:30 **BREAKFAST**

8:30 - 9:00 **Review of and reflection on the products developed**

9:00 - 10:30 **Task Four: Identification of Next Steps**

{The whole group will brainstorm key questions that need to be resolved and then the three small groups will develop specific recommendations}

10:30 - 11:00 **BREAK AND HOTEL CHECKOUT**

11:00 - 11:45 **Reporting, discussion and assignments for next steps**

11:45 - 12:00 **Closing and Send Out**

APPENDIX B: Background Materials

BRIEFING PAPER: ACCOUNTABILITY FOCUS GROUP

INTRODUCTION:

Leading and Managing for Performance, (NASDSE, 1993) supports educational restructuring and reform and calls for a greater focus on student performance and results. Accountability for implementation of the fundamental processes of FAPE is a vital component of this focus and NASDSE urges that the substantative test (educational benefit) for FAPE should become moreoperational. There appears to be an emerging consensus that a broad-based accountability "model" is needed to effectively assess the status of the education of students with disabilities. Components of a comprehensive accountability model already exist or are evolving. These components include compliance monitoring (input/process accountability), state assessment systems based on state determined standards (outcome accountability), and individual student accountability (accountability for individual student achievement and procedural protections).

To initiate discussion of this topic, the NASDSE Board of Directors has scheduled a focus group meeting to convene February 24 - 26, 1995 in Salt Lake City, Utah.

PURPOSE OF THE FOCUS GROUP:

The overall purpose of this focus group is to begin to develop a shared vision of accountability for the education of students with disabilities. The development of a shared vision shall consider existing components, means of articulation across components, and potential roles that the U.S. Department of Education, state education agencies, local school systems and families have in the implementation of a comprehensive model of accountability.

ANTICIPATED OUTCOMES:

1. A shared understanding of the differences among input/process accountability, results-based accountability, and the accountability for individual student performance and due process.

2. A shared understanding of the need for a multi-component and multi-level articulated model of accountability.

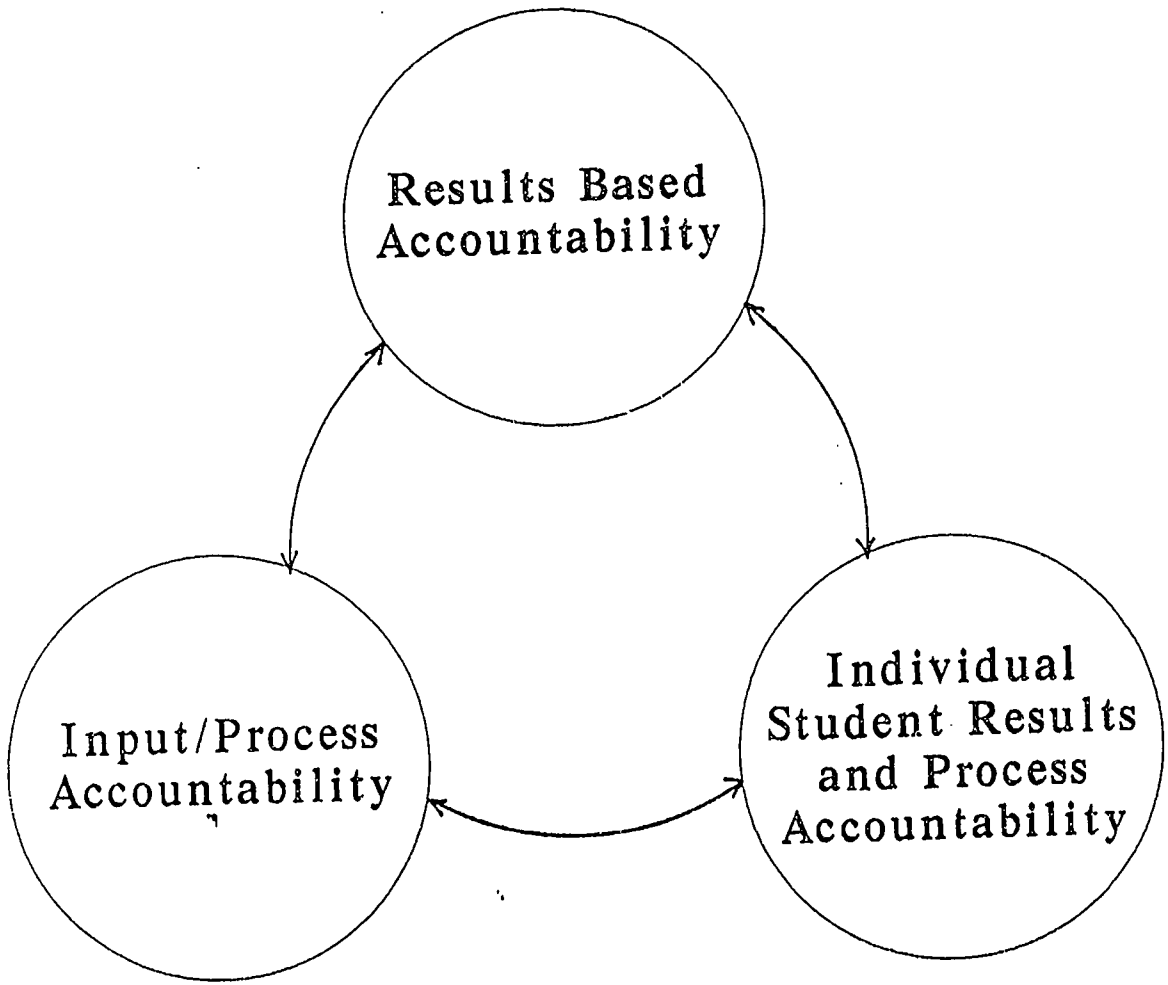
3. A shared understanding of the need for multiple stakeholder roles and responsibilities in the implementation of a comprehensive articulated model of accountability.

4. A shared understanding of the relationship between an accountability system for the education of students with disabilities and the broad-based systems of accountability that undergird states' educational reform efforts.

5. Initial ideas about how best to report nationally the status of the education of students with disabilities so that the creation of a unified system of accountability is prompted.

6. A plan for sharing and refining the initial understandings and vision that are developed as a result of this meeting with other stakeholders.

An Articulated Model of Accountability for the Education of Students with Disabilities



Notes from Tom Hehir's Presentation at Monitoring Conference - 11/4/94

As a part of the "reinventing government" activities that have been going on throughout the Executive Branch, OSERS has taken time to consider "Who are our customers?" It has decided that **OSERS' customers are people with disabilities and sometimes their parents."**

Those who are paid to deliver services to OSERS customers are OSERS' partners. OSEP is an "enforcer" and this must be a part of the partnership relationship. It is the same type of relationship that SEAs have with their LEAs.

OSERS enforces and implements. Although OSEP intends to put an emphasis on implementing, it cannot deny its responsibility to enforce.

The biggest thing that OSEP's customers value is the monitoring and enforcement of IDEA - this is what the customers are saying. They think it is a good law and they want it protected. Although we might expect that everyone will do what IDEA requires just because it is right, some do not. The IDEA was passed because the 14th amendment to the Constitution was not working for students with disabilities and there was widespread exclusion of students with disabilities from school.

Do we need to continue to monitor? Yes, because the education of students with disabilities requires school systems to do things differently from what they would otherwise do and it is unlikely that what is needed would be done without outside pressure. Therefore, monitoring is critically important - actually the **most important** thing done at OSEP.

OSEP is now looking at a 3 year change effort to emphasize those aspects of monitoring that are most connected to results for students with disabilities. We must be conservative and not deny that **inputs do matter** while we **add the emphasis on results**.

The Longitudinal Study shows that students with disabilities in regular classes frequently get no supports or modifications and fail as a result; those who got the necessary support succeeded. This is an **input** issue that is critically important to success for students with disabilities.

We have to avoid the **naive romanticism** of looking only at outcomes. Some states have dismantled their capacity to monitor compliance and this is misguided.

Every instance of non-compliance is **not** equal. OSEP is trying to get away from this approach. We need to be able to focus on the things that are most important. For example, protecting rights and seeing that students with disabilities get FAPE is the big issue. OSEP monitoring reports will begin to reflect this emphasis. Easy issues

have had too much attention and the more difficult ones have not had adequate attention.

Enormous variability exists from state to state in implementing LRE, a major influence on student results. We have to move students with disabilities **away from inappropriate segregation.** A state's educational finance system is an important variable that influences LRE. This is another complicated problem. Personnel issues are another enormous factor influencing LRE and quality.

We have to look at **systemic issues** to make the system serve students better. The important point is the **intersection of the input orientation and the results orientation.**

There are many implications for the federal-state relationship. The feds must use monitoring to identify the issues that states should be handling to move systems forward in IDEA implementation. We must move to what the law intended in the first place and monitoring is a powerful force in this effort.

We have accomplished a lot in **access** for students with disabilities in the past 20 years, but we now have to go beyond that. Monitoring has had an important role in this achievement and it will continue to have an important role in the future.

We have to take a **developmental approach** - study and phase-in changes to meet newly identified needs.

It will be important to avoid an **esoteric debate** on "monitoring for quality." For example, monitors cannot judge the efficacy of a specific assessment for a student. We need to look at the total program a student is experiencing. We must also re-think the concept of the IEP. Quality can be inferred from results such as dropout rates, access to vocational training, etc.

OSEP cannot overstep the bounds of legal authority. However, there is **enough authority** to do what has to be done to **incorporate** a results orientation.

The administration is trying to coordinate federal educational policy and programs better than it has in the past. Reauthorization of IDEA will align more closely to Goals 2000, School-To-Work, and other federal education laws. However, it is clear that these laws all have different purposes. Such coordination is complicated and it is clear that it will be a while before meaningful coordination happens at the federal level.

Learner-Based Accountability: Making Schools Work for All Students

A monograph prepared for the

Northeast Regional Resource Center

by:

Mary Ann Lachat, Ed.D.

May 1994

The Northeast Regional Resource Center (NERRC) is a program of Trinity College of Vermont, Institute for Program Development, Burlington, VT 05401. NERRC is funded by the U.S. Department of Education, Office of Special Education and Rehabilitative Services, Special Education Programs. Cooperative Agreement #H028A10009.

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A NEW PARADIGM—HIGH LEVELS OF SUCCESS FOR ALL

"If schools are to be responsive to the different needs and talents of diverse learners, they must be organized to allow for variability rather than to assume uniformity. . . Rather than seek to make the current system of schooling perform more efficiently by standardizing practice, school reform efforts must focus on building the capacity of schools and teachers to undertake tasks they have never been called upon to accomplish. Schools and teachers must work to ensure that all students learn to think critically, to invent, to produce, and to solve problems. Because this goal requires responding to students' nonstandardized needs, it far exceeds what teacher-proof curricula or administrator-proof management processes could ever accomplish."

Linda Darling-Hammond, 1993

The Economic Mandate for School Change

Across the nation, reform efforts are focussing on what students need to know and be able to do in a highly complex, technological society and global marketplace. Within this context of reform, educators, business leaders, policy makers, and legislators agree that the level of student achievement in American schools must be raised. The two parts to this national "call to arms" are: 1) too many students are failing to achieve even basic competencies; and 2) the world we live in requires skills that are not being explicitly addressed in schools. These two concerns have led to a nationwide emphasis on defining desired student outcomes, establishing standards of performance, and holding schools accountable for helping all students learn at high levels.

The momentum to create high academic standards for all students has been fueled by the shift from an industrial-based economy to an information-based economy, a shift that has left many American workers without the necessary skills to succeed. Because the demands of society are different today, the economy no longer has a place for individuals who are willing to work hard but have minimal skills. According to a report published by the Hudson Institute, more than half of the new jobs created in this decade will require education beyond high school, and 90 percent will require at least a high school education (Hudson Institute, 1987).

Numerous studies and reports have described the deficiencies and "skills gap" in the American workforce, concluding that unless educational performance in the United States improves dramatically, American workers will be unable to use the new technologies that will create most of the world's jobs and economic growth in the next century (United Way of America, 1990, U.S. Department of Labor, 1991, Hudson Institute, 1987). The high school completion rate hovers around 75%, students with a diploma are not necessarily literate, and many of those who enter college or the workforce are not prepared to meet the increasing demands of a rapidly changing, technology-driven, and increasingly competitive market place.

The need to link educational reform to a mission of ensuring that all students are prepared to meet the challenges of a high technology information age has been underscored by virtually all sectors, including corporate America, and improving student performance is the focal point of major policy initiatives nationally and in almost every state capitol. Such prominent groups as the National Business Roundtable, the National Governor's Association, and the Education Commission of the States have endorsed the concept of redesigning education around high standards of student performance as the fundamental principle of school reform.

The emerging reform agenda is calling for a "new paradigm" of education that puts student achievement at the center of the school's mission, and holds schools accountable for providing educational opportunities that enable all students to acquire the necessary knowledge, skills, and personal orientations needed to succeed in adult life. An emphasis on higher levels of learning for all students means that schools must shift to a new paradigm driven by assumptions, principles, and practices that contrast sharply with the current paradigm on which schooling in America is based.

For the past 100 years, our schools met the workforce needs of an industrial society by organizing learning around a standardized curriculum delivered in standardized time periods called Carnegie Units. Within this structure, curriculum is defined as a set of units, sequences, and facts, and grades are based on the averaging of performance over a fixed period of time. Credentials (Carnegie units) are awarded based on "time served", and the failure of significant

numbers of students is not only accepted, but regarded as an expected result of norm-referenced testing. The technology-driven information age requires a very different approach to education. Today's workplace already requires individuals to understand multidimensional problems, design solutions, plan their own tasks, evaluate results, and work cooperatively with others. These changes represent a new mission for education that requires schools not merely to deliver instruction but to be accountable for ensuring that educational opportunities result in all students learning at high levels. The teacher's job is no longer to "cover" a time-based curriculum, "but to enable diverse learners to construct their own knowledge and to develop their talents in effective and powerful ways." (Darling-Hammond, 1993).

The Mandate for Equity

The nationwide focus on student performance has heightened concerns about the educational outcomes of students with diverse needs, including students with disabilities. Echoing other educational constituents seeking answers about the outcomes that result from special education is a report of the National Council on Disability (1989), which summarized the views of parents, educators, taxpayers, and others.

> *"The time has come to ask the same questions for students with disabilities that we have been asking about students without disabilities: Are they achieving? Are they staying in school? Are they prepared to enter the work force when they finish school? Are they going on to participate in post-secondary education and training? Are they prepared for adult life?"*

In its Twelfth and Thirteenth Annual Reports to Congress on the Implementation of The Education of the Handicapped Act (now entitled the Individuals with Disabilities Education Act), the Department of Education reported dismal outcomes for students with disabilities. In 1987-88, nearly one-third received a failing grade in at least one of their courses, and in 1988-89, only slightly more than one half of students with disabilities exiting the school system left with a diploma or certificate. Despite the similarities between students who are labelled as learning

disabled and those who are not, in 1988-89 more than 80% of the learning disabled students received educational services outside the regular classroom.

The National Longitudinal Transition Study (NLTS) collected school performance data on more than 8,000 youth between the ages of 13 and 23 who were in special education programs in the 1985-86 school year. The study determined that 1 in 10 students did not receive grades in any courses, and that a third of the students considered to be in graded programs received a failing grade in one or more courses. About a third of the 8,000 students dropped out of school over the two year period; and the dropout rate for students with a learning disability was 36% (Wagner, 1989).

Underlying the momentum to create standards, better schools, and better educated students is a strong belief that "students who have been traditionally allowed to fail must be helped to succeed, and that many more must become not just minimally schooled but highly proficient and inventive (Darling-Hammond & Snyder, 1993). More than ever before in our nation's history, policymakers and the public are recognizing that educational failure and undeveloped human talent are permanent drains on society.

> *"To fulfill the old promise of American education—that students will be prepared to take their place in society—requires a new level of performance for the system, and a new level of effort at reform. . . Standards-based reform seeks to establish clear attainable standards at internationally competitive levels: for the entire student population. This represents a new way of thinking—a paradigm shift—about American students. It raises our expectations for every student in every school, not just some students in some schools."*
>
> *National Education Goals Panel, 1993*

The New Paradigm—A Catalyst for School Reform

The current movement to reform American schools represents a large-scale shift in national and state-level policy making toward performance-based reform (Finn, 1990). The paradigm that puts learner outcomes at the center of the school's mission has shifted the purpose and direction of reform initiatives to an emphasis on higher levels of learning for all, and school accountability to key stakeholders such as parents, business representatives, and community members. A conceptual transformation is occurring in education today, and improving the level of student learning in America's schools has become the focus of educational policy thinking and action across the nation. State policy making bodies have placed the debate over what students should know and be able to do at the center of major statewide efforts to define standards of achievement, design new curricular frameworks, and adopt richer assessment systems to measure students' and school performance (Wilhoit,1992). This shift has fundamentally altered traditional views of school improvement.

Many educational change experts recognized the need for this shift a decade ago. In 1983, Theodore Sizer, the founder of the Coalition of Essential Schools, described it as "one that rejects time-based, means-based, bell-curve-based schooling in favor of results-based, success-based schools" (Sizer, 1992). Dr. Philip Schlecty of the Center for Leadership on School Reform describes the "mandate for change" this way:

> *"Altering the rules, roles, and relationships that govern the way time, people, space, and technology are deployed and used so that schools are organized around children and the work we want them to do, and so that communities are organized to support the creation of conditions that will allow those children to succeed at what we want them to do."*
> *Schlecty, 1993*

Throughout the history of educational change, the emphasis has been on improving the process of education—changing instructional methods and practices, adopting new programs, altering

schedules, etc. Educators and reformers focussed on the content of education—on changing the curriculum, the textbooks, the lessons and adding new programs. Hundreds of learning objectives (which were thought of as outcomes) were derived from existing curricula (content) rather than designing curricula to facilitate the achievement of intended outcomes representing what students should actually know and be able to do. Our attention to the product of education—the educational achievement of students—was largely ignored in the old paradigm. New programs, practices, and curricula may have been "validated" by virtue of having produced desirable results where they were developed and evaluated, but when these innovations were adopted by others, their impact on students was rarely assessed, and often non-existent.

Efforts to reform schools over the past several decades conformed to the industrial model, regarding schools as bureaucracies with various layers of management and instructional delivery that could be improved by increasing efficiency. The reforms of the 1970's tried to standardize the quality of schooling by mandating curriculum guides and narrowing textbook selection. When the effective schools movement began, it focussed on the common characteristics of "high achieving" schools. These characteristics, called "correlates" of school effectiveness, became the foundation of hundreds of school improvement initiatives across the country. The first and last of these correlates, as expressed by Edmunds, Lezotte, and others, were thought of as the "pillars" of school effectiveness—**an emphasis on success for all students** and **frequent monitoring of student progress** toward achieving success. However, while many schools involved in the effective schools movement made a commitment to frequent monitoring of student progress, progress was tracked in terms of very limited notions of educational success—getting satisfactory grades, getting promoted, and accumulating credit. Although the school improvement models of the '80s sought to define the various dimensions of school effectiveness, few of them directly addressed the outcomes of education. Achievement was defined in terms of the educational process, and educators became chagrined to learn that a surprising number of students who had achieved these educational milestones did not have the knowledge, skills, attitudes and personal qualities that are prerequisites to success in the "real

world" (Lezotte,1991, Lezotte and Jacoby, 1992, Eaker, Ranells, and DuFour, 1991, Levine and Lezotte, 1990). What we learned from the effective schools movement was that implementing new programs and practices does not ensure better results.

> *"Unfortunately, site-based innovations mean nothing if a school cannot determine if the efforts have had an effect on students. Most schools move from innovation to innovation ('We are doing whole language, or cooperative learning, or curriculum integration') and define success as the implementation of the latest innovation. To be blunt, this is nonsense. What difference does any innovation make if a school cannot determine effects on kids?"*
>
> *Glickman, 1992*

In the past, special education also was driven by an emphasis on the content and process aspects of reform rather than a systematic examination of the outcomes and benefits that resulted for students. For more than a decade after the enactment of P.L. 94-142 in 1975, attention at national, state, and local levels focussed on compliance with the procedural provisions of the Act that were designed to ensure access and equity for students with disabilities. Today, however, special educators have also shifted to an emphasis on defining appropriate outcomes for students with disabilities, and on determining the extent to which various programmatic and instructional approaches result in students' acquiring the knowledge, skills, and orientations they need to lead productive and fulfilling lives.

More and more educational leaders are recognizing that embarking on school reform without defining and monitoring the intended impact of reform initiatives on educational results does not lead to improved outcomes or higher levels of learning for students. The emphasis on student outcomes and school accountability that is driving current national and state-level reform efforts thus represents an important shift in our orientation toward educational change and innovation in America's schools.

THE MOVEMENT TO DEFINE STANDARDS AND OUTCOME FRAMEWORKS

"In the absence of national standards, we have evolved a haphazard, accidental, disconnected national curriculum based on mass-market textbooks and standardized, multiple-choice tests. Education reform must begin with broad agreement on what children should learn. Learning, after all, is the heart and soul of education. When there is no agreement regarding what students should learn, then each part of the education system pursues different, sometimes contradictory goals."

Diane Ravitch, 1993

National Goals and Standards

Under the Goals 2000: Educate America Act, the National Education Goals adopted by the nation's governors in 1990 have been codified into law. The National Governor's Association proposed the national goals as a vision of change for all children. The goals were designed from a belief that "efforts to restructure education must work toward guaranteeing that all students are engaged in rigorous programs of instruction designed to ensure that every child, regardless of background or disability, acquires the knowledge and skills necessary to succeed in a changing economy" (National Governor's Association, 1990).

Secretary of Education, Richard W. Riley described the National Education Goals as a shared vision "of the education system our country needs for the 21st century. It is one in which schools help every child (regardless of her background or where he attends school) to reach challenging academic standards and leave school prepared for responsible citizenship and a productive future. . . It is of an education system that is committed to producing real results, for all of its students" (U.S. Department of Education, *Community Update*, September, 1993). Under Goals 2000, the National Goals have set the following vision for America's schools.

By the year 2000:

1) *All children will start school ready to learn;*

2) *The high school graduation rate will be at least 90%;*

3) *All students will leave grades 4, 8, and 12 competent for their level in English, math, science, foreign languages, civics and government, economics, arts, history and geography, and the capacity to use their minds well for responsible citizenship, further learning, and productive employment in our nation's modern economy;*

4) *The nation's teaching force will have access to professional inservice training programs;*

5) *United States' students will be first in the world in math and science achievement;*

6) *Every adult American will be literate and will possess the knowledge and skills necessary to compete in a global economy and exercise the rights and responsibilities of citizenship;*

7) *Every school will be free of drugs, violence, and the unauthorized presence of firearms and alcohol and will offer a disciplined environment conducive to learning; and*

8) *Every school will promote partnerships that will increase parental involvement and participation in promoting the social, emotional, and academic growth of children.*

By focussing on improving the knowledge and skills of the nation's students, the National Education Goals provide a foundation for developing national standards that are intended to: 1) identify what students need to know and be able to do to live and work in the 21st century; 2) raise the achievement of all students; 3) ensure that all students have equal educational opportunity; and 4) create a coherent and consistent approach to education in the nation's educational system. The standards movement reflects widespread recognition that the lack of consensus about what students should learn in the nation's schools is contributing to the erosion of student achievement. Proponents of standards argue that "when no one agrees on what students should learn, then each part of the educational system pursues different, and sometimes contradictory, goals. As a result, the education system as a whole is riddled with inequity, incoherence, and inefficiency" (U.S. Department of Education, 1992).

The work of the National Council of Teachers of Mathematics (NCTM) demonstrated the power of national curriculum standards to drive education reform in a coherent manner. Published in 1989, the NCTM *Curriculum and Evaluation Standards for Mathematics* were created through a review and consensus process involving a wide array of participants including business leaders, parents, mathematicians, and thousands of teachers who collaborated on what students should know and be able to do in mathematics. The NCTM used a similar consensus process to develop the *Professional Standards for Teaching Mathematics* and recently began a two-year effort to develop standards for math assessment that will expand upon concepts contained in the curriculum-standards document.

What is unique about the NCTM effort is that it evolved from the initiative of the professional community. The momentum and authority to develop the mathematics standards didn't come from a government agency or corporate group, but from the nation's math teachers who had surveyed their field and decided it needed to change. The NCTM Standards represent an empowering vision of school mathematics for all students. They are based on the premise that all students need to learn more and different types of mathematics in order to be productive citizens in the 21st century. The Standards emphasize that "students need to learn to value mathematics, to reason and communicate mathematically, and to become confident in their power to use mathematics coherently to make sense of problematic situations in the world around them" (Romberg, 1993). Since their publication, the NCTM Standards have had a significant impact on curriculum development efforts, instructional practices, assessment, staff development, and teacher education at every level. Every commercial mathematics textbook published since 1989 has claimed to incorporate the NCTM standards, and according to the NCTM, by 1992 about a third of the nation's mathematics teachers were using the new standards (Ravitch, 1993). A survey by the Council of Chief State School Officers indicated that at least 41 states have realigned or are in the process of realigning their state frameworks with the NCTM Standards (Blank and Dalkilic, 1992).

Following the work of NCTM, in 1992, the National Council on Educational Standards and Testing (NCEST), a bi-partisan group established by Congress, published the report, *Raising Standards in American Education* which put the issues of standards and assessments before the public. NCEST recommended the development of high standards that were national, not federal, (i.e., not controlled by the federal government), voluntary, not mandatory, and dynamic, not static. Their report emphasized that the standards should be developed through a participatory process and should be used to provide focus and direction to curriculum reform in various content areas, but not to create a national curriculum. NCEST did not recommend a single national examination, but rather "a national testing system that was fair and equitable, in which different tests would be linked to common standards" (Ravitch, 1993). NCEST provided clarification of the meaning of standards by recommending that the national standards be developed to include: 1) content standards—what students should know and be able to do; and 2) performance standards—the level(s) of student competence in the content (O'Neil, J., 1993, Selden, R., 1992).

Proponents of national standards and assessments consider them to be the "best way to propel education reform forward, from the state policy level to classroom instruction," and the most effective means of quickly energizing the entire system (National Association of State Boards of Education, 1992). The Goals 2000: Educate America Act is intended to provide a framework for meeting the national goals by promoting coherent nationwide, systemic education reform to "ensure equitable educational opportunities and high levels of achievement for all American students," providing a framework for reauthorization of all Federal education programs, and by promoting the development and adoption of "a voluntary national system of skill standards and certifications." The law establishes the National Education Goals Panel and the National Education Standards and Assessment Council which will develop and certify voluntary national content, performance, and opportunity-to-learn standards, as shown in

FIGURE 1

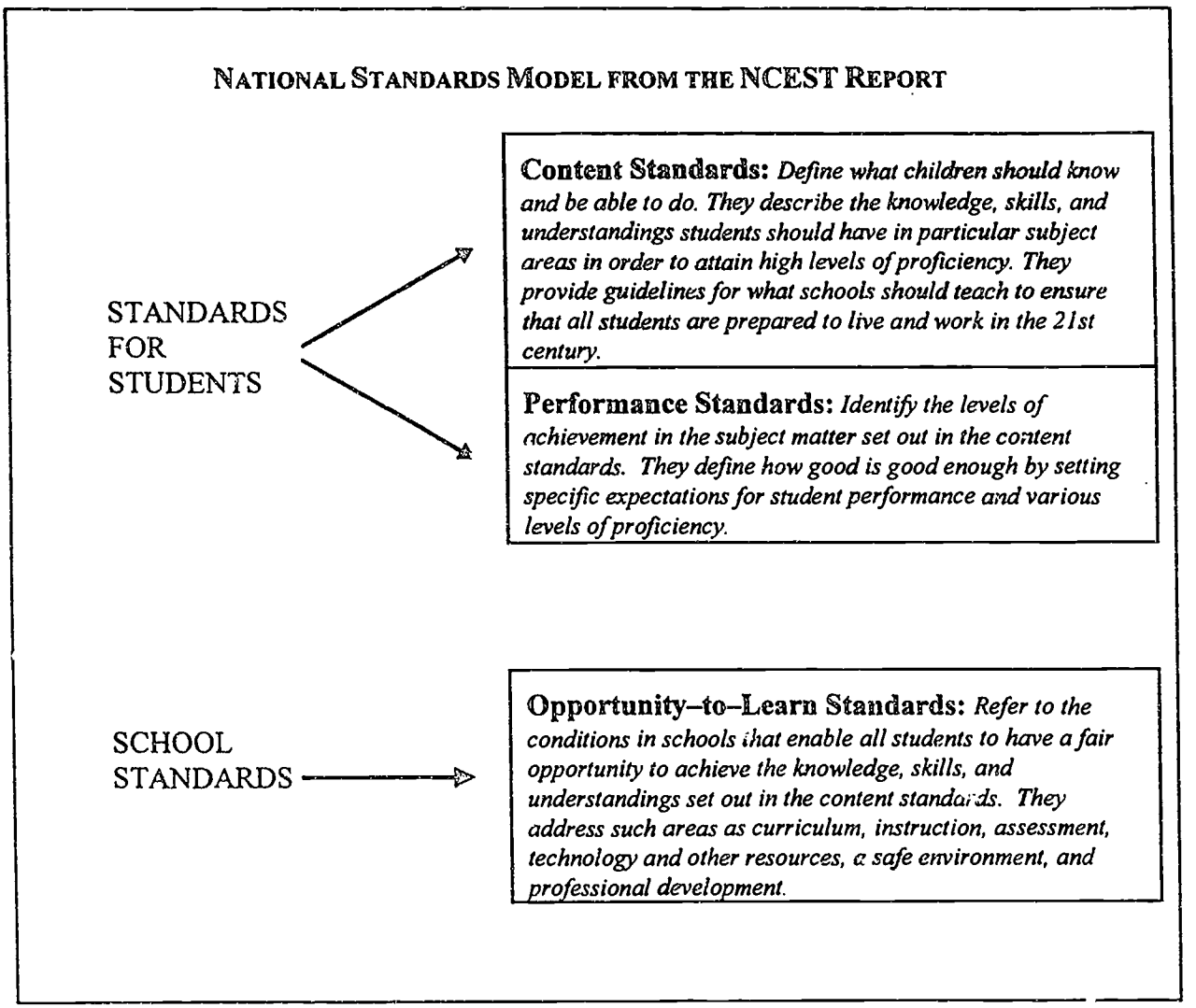


Figure 1 above. The legislation does not propose a single national examination. The legislation calls for states to submit a Strategic Educational Reform Plan developed by a multi-constituency group. If the plan is approved, the state will qualify for funds to implement the plan, including funds that can be awarded to schools that undertake reforms called for in the legislation.

Currently, at least 11 national professional and subject-matter groups are spearheading efforts to set academic standards for their own disciplines, and the U.S. Department of Education has funded national standards projects in the arts, civics, English, foreign languages, geography, history, and science. For the first time, specialists in various disciplines are setting aside their parochial interests to agree on a core set of knowledge and skills that all students, not just high achievers, should be taught. However, the education standards resulting from these efforts will be anything but standardized. The projects are highly diverse in terms of funding levels (ranging from $30,000 to over $3 million), timelines, scope of participation, and specificity of learner outcomes. Some projects are developing detailed guidelines, while others are defining broad themes on which to base instruction. The boards that oversee some of the standards projects have a high representation of scholars, while others rely more on teachers. As the standards-setting movement gains momentum, concerns are being raised that the documents may be too numerous, lengthy, and different from one another, and contain too much to teach (Viadero and West, 1993, Viadero, 1993). Thus, while all of the initiatives appear to be significantly influenced by the work of the NCTM, educators will be seeing more diversity than uniformity in the approaches and the quality of standards produced.

Outcome Frameworks

Paralleling the interest in national standards has been the emergence of outcome frameworks intended to provide direction in determining what students should be taught to meet both the challenges and the promises of adulthood in an increasingly technological and changing world.

The SCANS Reports

Notable at the national level is the outcome framework developed by the Secretary of Labor's Commission on Achieving Necessary Skills (SCANS), which focussed on how schools should prepare young people for work. The Commission's charge was to define the skills needed for employment today in all manner of jobs. The first SCANS report, *What Work Requires of*

Schools: A SCANS Report for America 2000, emphasized that the demands on business and workers are very different with the "globalization of commerce and industry and the explosive growth of technology on the job." The report concluded that "all American high school students must develop a new set of competencies and foundation skills if they are to enjoy a productive, full, and satisfying life", and that the nation's schools must be transformed into high-performance organizations "relentlessly committed to producing skilled graduates as the norm, not the exception" (U.S. Department of Labor, 1991).

Five competencies were identified, which, in conjunction with a three-part foundation of skills and personal qualities "lie at the heart of job performance today", and represent essential preparation for all students. The report emphasized ". . .seldom does one of these eight components stand alone in job performance. They are highly integrated, and most tasks require workers to draw on several of them simultaneously." The five competencies and three foundation skills, referred to in the SCANS document as "workplace know-how", are depicted in Figure 2.

A second report, *Skills and Tasks for Jobs: A SCANS Report for America 2000*, included hundreds of detailed, job-related examples of how the competencies and foundation skills would be used (and required) in various job tasks. A third report, *Learning a Living: A Blueprint for High Performance*, provides specific examples and recommendations for integrating the SCANS competencies into the curriculum, and compares traditional approaches to various skills (e.g., writing) to approaches that are consistent with workplace requirements.

The SCANS Reports begin from the premise that while "schools do more than prepare young people for work", all of the major national reform efforts recognize a need "to link education to the real world. All seek a particular kind of learner, one who can put knowledge and skills

FIGURE 2

WORKPLACE KNOW-HOW

The know-how identified by SCANS is made up of five competencies and a three-part foundation of skills and personal qualities that are needed for solid job performance. These are:

WORKPLACE COMPETENCIES—Effective workers can productively use:

- **Resources**—They know how to allocate time, money, materials, space, and staff.
- **Interpersonal skills**—They can work on teams, teach others, serve customers, lead, negotiate, and work with people from culturally diverse backgrounds.
- **Information**—They can acquire and evaluate data, organize and maintain files, interpret and communicate, and use computers to process information.
- **Systems**—They understand social, organizational, and technological systems; they can monitor and correct performance; and they can design or improve systems.
- **Technology**—They can select equipment and tools, apply technology to specific tasks, and maintain and troubleshoot equipment.

FOUNDATION SKILLS—Competent workers in the high-performance workplace need:

- **Basic Skills**—reading, writing, arithmetic and mathematics, speaking and listening.
- **Thinking Skills**—the ability to learn, to reason, to think creatively, to make decisions, and to solve problems.
- **Personal Qualities**—individual responsibility, self-esteem and self-management, sociability, and integrity.

SCANS, 1992

into practice as a productive worker, a responsible citizen, and a more complex human being." To the extent that the SCANS Reports deal with issues of equity and diversity, they do so with respect to minority and low-income workers and those with limited proficiency in English. While they do not directly mention students or workers with disabilities, they do argue forcefully for respecting differences in people:

> *"Education in the SCANS skills must begin with the realization that there are many paths to the same goal; that assessments should play to students' strengths, not their weaknesses; and that tests should not needlessly penalize students who need more time... Variation and diversity are not the enemies of high-quality education. The enemy is rigid insistence on a factory model of schooling, a prescription for failure that refuses to accommodate diversity or to allow those students with special strengths to function productively."*
>
> *Learning a Living: A Blueprint for High Performance, 1992*

The SCANS reports continue to influence the development of outcome and curriculum frameworks at the national, state, and local levels, because they have brought core competencies and foundation skills to life for policy makers, educators, and students alike. Moreover, the SCANS framework of competencies and skills are seen as highly relevant to life-roles other than work.

An Outcome Framework for Special Education

The National Center on Educational Outcomes (NCEO) at the University of Minnesota, was funded by the Office of Special Education Programs to develop an outcome framework and a set of outcome indicators for students with disabilities. NCEO's Conceptual Model of Educational Outcomes was developed in collaboration with the National Association of State Directors of Special Education (NASDSE) through a consensus process involving hundreds of educators, policy makers, administrators, and parents. It is viewed by NCEO as an inclusive framework that is applicable to all students, not just students with disabilities. Shown in Figure 3, the model includes eight outcome domains. Two of the domains, Presence and Participation, and Accommodation and Adaptation are placed within the context of the educational process itself—i.e., NCEO proposes that an examination of outcomes for all students, including students with disabilities, must take into account their level of participation in school and their adaptation and coping skills. The six other domains included in the model are Physical Health, Responsibility and Independence, Contribution and Citizenship, Academic and Functional Literacy, Personal and Social Adjustment, and Satisfaction.

For each of the domains, the model identifies outcomes, indicators of outcomes, and data sources for the various indicators. The domain of Academic and Functional Literacy includes five overall outcomes, two of which reflect the nationwide emphasis on higher order thinking skills and use of technology. The five outcomes for which students must demonstrate competence are: communication; problem-solving strategies and critical-thinking skills; math, reading, and writing skills; other academic and nonacademic skills; and using technology. NCEO views its model as providing a framework and examples that can be used by states, districts, and schools. NCEO is also using a consensus-building process to identify outcomes and indicators for developmental levels that will span from 3 years of age to post-school age.

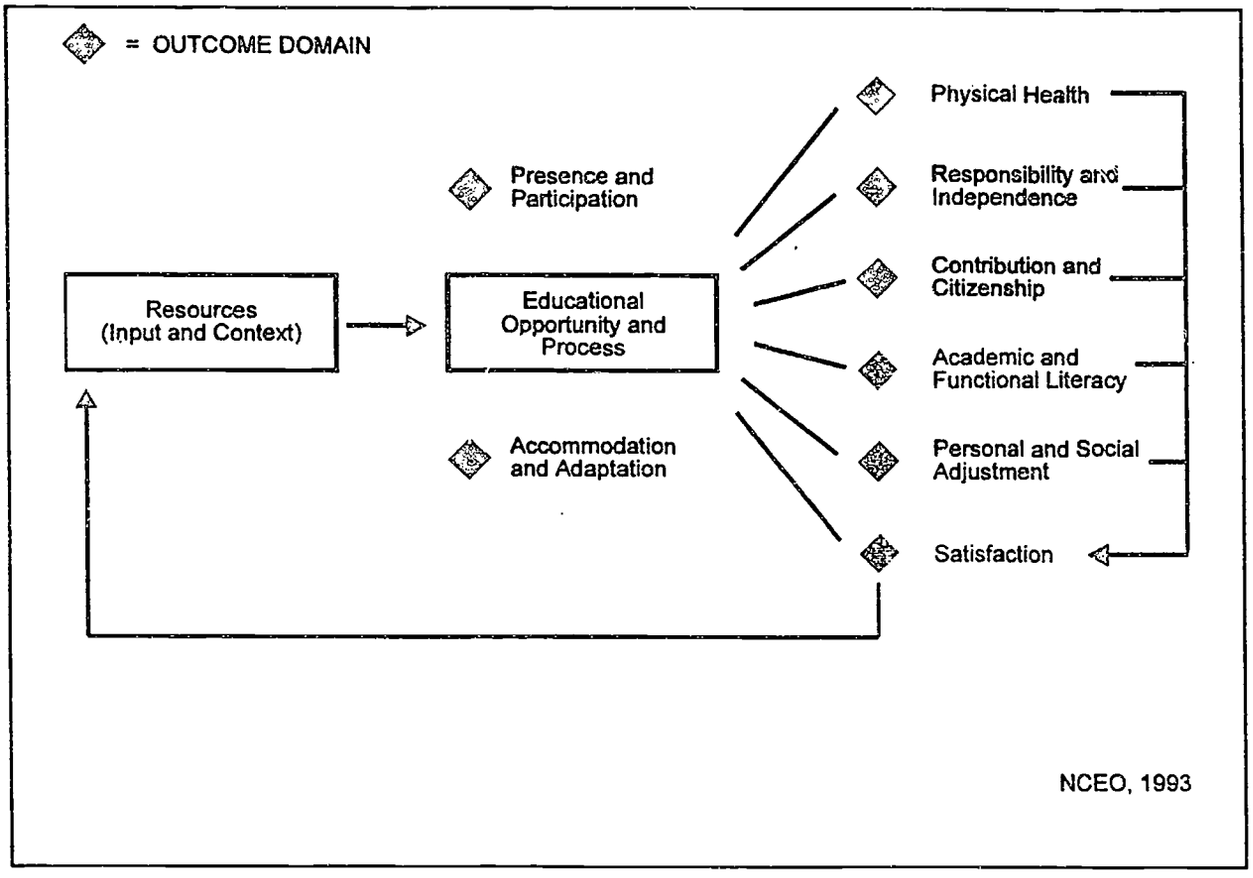
State Frameworks

Over the past several years, many states have started to create curriculum frameworks that represent a new vision of what students should learn in school and a more integrated approach to education. According to the National Association of State Boards of Education, at least 30 states have identified essential student outcomes. While various states differ philosophically about what is important to include in the school curriculum, the underlying purpose of most of the states' efforts is to align curriculum and instruction with clear definitions of student learning.

The state initiatives are often linked to state assessment programs or curriculum frameworks, and attempt to provide direction for reform at the local level. California was the first state to develop and use a state curriculum framework as a master plan for reforming instruction, assessment, textbooks, staff development, and teacher education.

Some states (Connecticut, Maine, Michigan, and South Carolina) have developed frameworks that tie learner outcomes to a thematic organization of subject matter. These frameworks have been designed to provide a vision of the opportunities to learn that schools should provide for students. Other states, including Florida, Kentucky, Pennsylvania, and Vermont,

FIGURE 3



are seeking to integrate "real-life" workforce characteristics into the curriculum, "attempting to ensure that students perform at significantly high levels and meet expectations held by schools and future employers" (Olsen and Massanari, 1992).

Maine and Virginia developed frameworks called a "common core of learning" to articulate a vision of education in their respective states. Through the notion of a "learning core," these states did not attempt to define everything that students would learn during their education experience, but rather what must be common to all students. Maine's Common Core of Learning (1990) was intended to challenge traditional beliefs about students and schooling by providing a conceptual model of what students will need to know in the 21st century in the following four

areas: Personal and Global Stewardship; Communication; Reasoning and Problem-Solving; and the Human Record. Organized as a cross-disciplinary integrated approach to teaching and learning, it was developed as a basis for charting the course of educational change in Maine.

Regarding the participation of students with disabilities, the state-sponsored commission of business and educational leaders, professionals, and parents that developed the Maine framework stated, "we believe exceptional students should experience the Common Core of Learning to the degree that they are able, with the support of teachers who build on their strengths. The Individual Education Plan (IEP) is the vehicle for identifying which learning outcomes are appropriate for a given student."

Virginia developed a program called World Class Education with a Common Core of Learning as its centerpiece. Six principles guide the Virginia program: 1) a focus on outcomes and the results of education; 2) schools will be held accountable for their results; 3) the assumption that all students can learn; 4) an emphasis on collaboration, rather than competition; 5) an emphasis on active, constructed, and connected learning, drawn from a variety of content areas and related to real problems; and 6) the role of assessment in supporting better teaching and learning (Bradford and Stiff, 1993). Virginia's Common Core of Learning was not designed as a state curriculum, but rather as an outcomes-based framework for voluntary school improvement.

What Standards and Outcome Frameworks Mean For Students With Diverse Needs

Understandably, those who advocate education reform on behalf of students with disabilities have expressed concerns about the implementation of the national goals and have identified major issues about how the achievement of students with disabilities will be assessed in meeting the goals. Advocates have emphasized that students' needs for special accommodations to complete tests must be taken into consideration, and have pointed to research showing that many schools leave students with disabilities out of testing programs to boost overall district scores

(DeStefano, L. and Metzer, D., 1991; Schrag, J., 1991). Each year, the National Education Goals Panel produces a report on the nation's progress toward the national goals. However, most of the sources of information used for the report do not include students with disabilities. The National Center on Education Outcomes (NCEO) pointed out that in many cases, the lack of progress information for students with disabilities on goals that focus on academic achievement and performance is related to the exclusion of students with disabilities from national data collection programs (McGrew, K.S., Thurlow, M.L., Shriner, J.G., and Spiegel, A.N., 1992).

The NCEST report did not address the issue of how students with disabilities would be accommodated in a national standards and testing system, and concerns have been raised about how a national system will deal with the issue of equity for these students and for poor and minority students. Several national groups are calling for broader collaboration and consensus about how to make high standards work for all students. These groups have emphasized that "democratic standards-setting must keep equity central. We cannot develop a list of new standards and then ignore the savage inequalities in the opportunities students have to learn" (Stewart, 1993). The following statement is an excerpt from a document entitled *Criteria for National Testing Proposals* which is signed by more than 50 education and civil rights leaders, including James Comer, Linda Darling-Hammon, Keith Geiger, John Goodlad, and Ted Sizer.

> *". . .we believe that any real effort to create accountability in American schools must focus equal or more attention on improving the capabilities of children to learn and schools to teach as it does on gauging educational 'outcomes'. . . Given the tremendous differences between today's achievements and the goals set for America 2000, the inadequate supports for children and families in American society, and the dramatic inequalities among schools' resources, any policy to establish benchmarks for achievement without creating equity in the educational resources available to children would be a cruel hoax."*
>
> *National Association of State Boards of Education, 1992*

Supporters of national standards struggle with some basic issues that have important implications for special education. One basic question focusses on whether it is possible to develop a relevant set of content standards for all students, including those with special needs. O'Neil points out that "all of the efforts to establish national standards in various subject areas at this point affirm the goal that all students should be expected to master a core set of content standards." However, opinions diverge on the matter of student performance standards, i.e., levels of student attainment of the content standards. On one side of the discussion are the proponents of one set of performance standards and a mechanism for measuring and reporting performance for all students on these uniform standards. This view assumes that multiple performance standards would have negative results by encouraging differential expectations and tracking. Others point to the need for differentiated standards and emphasize the importance of recognizing that some students will develop more specialized expertise in certain content areas. This view also reflects the belief that outcomes for students with disabilities should reflect the individual and diverse educational needs of those students. It assumes that performance standards for some students with disabilities will be differentiated at certain points in the curriculum or at certain age or grade levels.

In its recent report to the National Education Goals Panel, *Promises To Keep: Creating High Standards for American Students*, the national Technical Planning Group for Goals 3 and 4 (goals aimed at academic achievement) emphasized that subject area content standards must be developmentally appropriate:

> *"The standards proposed should support and challenge students achieving at all performance levels. While they should not represent minimum expectations, the standards should be suitable to and within the capabilities of students to learn. Regardless of students' perceived ability, the standards should be achievable with proper supports and sustained effort. They should build appropriately on students' developed capabilities at the elementary, middle, and high school levels of schooling. Any student who works hard in a good program should be able to meet the standards, and any student who meets the standards should be well prepared for his or her future."*

The Technical Planning Group emphasized that "all students should be held to high and appropriate standards, and should be included in efforts to characterize the nation's level of education achievement." Their report made specific reference to the importance of high standards for students with disabilities:

> *"The purpose of standards-based reform is to include everyone in deeper understanding of the most important and enduring knowledge and skills. To succeed, the nation must raise achievement at all levels—among the most able as well as the average and the disabled."*

The report indicated that the standards set by the national professional organizations will be appropriate for many students now served in special education, recognizing that "for students with some disabilities, it might be appropriate to modify the conditions of instruction and methods of assessing attainment of those standards."

> *"The standards discussed in this report would apply directly to all students except those, like the severely mentally retarded, whose individual diagnosis implies a judgement that the student cannot meet them. The Technical Planning Group defers to health and special education professionals to identify on a case-by-case basis the standards, both the content and level of performance, appropriate for these students."*

The challenge facing special educators is to achieve consensus on appropriate outcomes for students with disabilities. The fundamental question is whether to have the same outcomes for all students, or to differentiate outcomes for different levels of ability or functioning. The publication *ISSUES & OPTIONS In Restructuring Schools and Special Education Programs (McLaughlin and Warren, 1992)* outlined some of the assumptions, strategies, and implications that relate to each option. Having a unified set of outcomes for all students assumes that there is one set of educational outcomes to which all students are entitled and which all students can attain. The risk is that the educational goals and needs of students with disabilities, particularly those with moderate or severe disabilities, may go unnoticed or not be reflected in the outcomes all students must achieve. A unified set of outcomes assumes that there is a unified curriculum based on a common core of knowledge that all students must have.

> *"Within a unified curricular framework, students with disabilities receive instruction in the broad curricular domains, but at levels commensurate with their current functioning and with instructional modifications, as needed. The primary need is for breadth and balance—meaning that the curriculum should be defined not in terms of narrow subject matter but broader areas of knowledge and skill. A unified curriculum accompanies the concept of a unified system and responds to a unified set of outcomes."*
>
> *McLaughlin and Warren, 1992, p. 61*

Having a differentiated set of outcomes assumes that "some students with disabilities may have unique educational needs that require a separate set of outcomes and performance measures that can be used for accountability purposes, and that it is educationally acceptable for those students to have different outcomes" (McLaughlin and Warren, 1992, p. 47). This option requires curricula with distinct alternatives designed to meet the unique educational needs of certain students with disabilities. The risk is that this approach will result in further separation of these students from the regular curricula, and could result in increased referral and identification if regular education viewed the alternative outcomes as less stringent, "thus providing a safety valve for students who are failing in the regular system."

Beneath the surface of the current dialogue around standards for students with special needs is a question of whether the American dream truly belongs to all students, and whether American society is morally committed to equal opportunity. Believing that high standards of learning are appropriate and even necessary for all students requires fundamental changes in our approach to schooling.

> *"In the past how students were taught was mostly fixed, and the results varied—some students failed, most learned at least some of what they were taught. To enable all students to learn at high levels, varied instructional strategies are needed to challenge them. The standards are fixed but the means of reaching them are varied. . . High standards for all is a way to say that we will refuse to settle for low levels of learning for any student. . . All students will have opportunities to learn at higher levels when American society acts on its belief that this result is important now and in the future, it is fair, and it is possible."*
>
> *National Education Goals Panel, 1993*

Proponents of national standards hope they will provide the leverage needed to address equity issues—the necessary leverage to overcome the low expectations set for so many students, to ensure that all schools and teachers are aiming at the same high goals, and to motivate states and local districts to provide the resources necessary to provide all students with equal opportunities to meet high standards. Standards help to clarify that the purpose of schooling is not to sort people into artificial and often limiting groups, but to make the knowledge and skills that are essential to success in today's society accessible to all so that all students have the chance to achieve their full potential.

SEAs will have to provide leadership in building a consensus on appropriate outcomes for students with disabilities in their states. First of all, consensus needs to be built regarding the extent to which educational outcomes for students with disabilities should be the same or different from the outcomes defined for students in general education. States have taken very different positions on this issue. For example, Kentucky has emphasized the inclusion of all students in general education outcomes that focus on the application of academic and problem-solving skills (Kentucky Council on School Performance, 1989). Michigan has taken the opposite approach by developing specific outcomes for each disability category (Frey, 1991). These outcomes are not intended to replace general education outcomes, but to define the skills that students with specific disabilities will need in order to achieve the outcomes defined for the general population.

Numerous national organizations and agencies have studied the issues surrounding the implications of outcomes and accountability measures for students with disabilities and related national initiatives. Their reports highlight the challenges of equity, inclusion, high standards, and parallel versus unified delivery systems. These groups include the Office of Special Education Programs (OSEP), U.S. Department of Education, the National Association of State Boards of Education, the National Association of State Directors of Education, the Council for Exceptional Children, the American Association of School Administrators, the National Association of Secondary School Principals, the National Association of Elementary Principals, the National Parent Network on Disability, and others. These groups have been active participants in a far-reaching dialogue related to defining life-long outcomes that span the full range of abilities and needs that will ultimately impact on how educational programs are structured for students with disabilities in the future.

LEARNER-BASED ACCOUNTABILITY—A FOUNDATION FOR SCHOOL REFORM

"Accountability is achieved only if a school's policies and practices work both to provide an environment that is conducive to learner-centered practice and to identify and correct problems as they occur. . .accountable schools institute practices for feedback and assessment, safeguards to prevent students from 'falling through the cracks,' and incentives to encourage all members of the school community to focus continually on the needs of students and the improvement of practice."

Linda Darling-Hammond & Jon Snyder, 1993

New Expectations for Student Success

A commitment to higher levels of learning for all students is a commitment to **learner-based accountability,** and this commitment is central to the emerging paradigm that is driving educational reform efforts. It is creating new roles for teachers and new perspectives of school accountability. Establishing this commitment is a major challenge for schools and requires an effort of sufficient intensity to overcome political and substantive barriers" (Darling-Hammond and Snyder, 1993). The school restructuring movement has become a major vehicle for helping schools shift to a new paradigm that reorganizes schools to be genuinely accountable for their students and to their communities. It makes student learning and school accountability the central elements of meaningful reform. Restructuring activities "change fundamental assumptions, practices, and relationships both within the organization and between the organization and the outside world in ways that are intended to result in higher levels of learning for all students. Unlike past reforms that often addressed elements of the educational system separately and focussed on improving the existing organization, restructuring addresses the changes needed in the total system and all of the interlocking influences on student performance" (Conley, 1993, David, 1991).

The central questions that drive school restructuring efforts are: What do we want students to know and be able to do? What kinds of learning experiences produce these outcomes? What

does it take to transform schools into places where this happens? In their extensive efforts to document the policy and organizational requirements of school restructuring, Darling-Hammond and her colleagues at the National Center for Restructuring Education, Schools, and Teaching (NCREST) have described new concepts of accountability that emphasize high levels of learning for all rather than the "traditional school outcomes of success for some and failure for many others." They call these forms of accountability "**learner-centered,** since they seek to focus on the needs and interests of learners for appropriate and supportive forms of teaching, rather than on the demands of bureaucracies for standardized forms of schooling" (Darling-Hammond, Snyder, Ancess, Einbender, Goodwin, and Macdonald, 1993, p.v.). Putting the learner at the center of school accountability means that schools are responsible for effectively engaging diverse learners, rather than being accountable for merely providing programs and delivering instruction regardless of the outcomes.

Recognizing that learner outcomes will not improve unless they are directly addressed, **learner-based accountability means that the entire culture of a school drives toward increasing student success.** This view of accountability implies that as educators, we are responsible for demonstrating the impact of policies, programs, placements, and practices on learner outcomes—that we are accountable to the consumers of education, the children, as well as to the parents, community members, and other stakeholders that provide financial support for education. This notion of accountability is different from bureaucratic forms of accountability that focussed on compliance with procedures and directives. It "grows from a belief that school staff must look at and be guided by the results they produce in their students" (Yssledyke and Thurber, 1992).

Some of the principles underlying learner-based accountability challenge traditional concepts of school organization. These principles emphasize designing curriculum based on what we want students to know and do, providing expanded opportunities for all students to learn and demonstrate what they are expected to know and do at a very high level, having high

expectations for all students, and shifting the reliance on norm-referenced standardized tests to the use of criterion-based performance assessments (Brandt, 1993). The curriculum is developed from the competencies students should demonstrate, rather than writing objectives that are derived from existing curricula.

The premise behind organizing schools around desired standards of student performance is that there will be high expectations for all students, since instruction will ultimately focus on higher levels of learning and competencies for all students. This approach has significant implications for students with diverse needs, since it implies that "teachers will be much more focussed on the learning capabilities of their students and far less on covering a given amount of curriculum in a given time block." Focussing on outcomes creates an inevitable need for educators to accommodate the differences in learning rates in any group of students ". . .this paradigm challenges schools to establish delivery systems that can adjust to these time differences" (Spady, 1992, 1993). The assumptions, principles, and practices that are the foundation for this new paradigm for schooling are dramatically different than those underlying the current paradigm, as shown in Figure 4.

The principles driving the new paradigm hold great promise for ensuring positive educational outcomes for students with disabilities through inclusion. In its earliest form, inclusion was tied to the principle of "least restrictive environment" from P.L. 94-142. Early efforts were largely characterized by the physical movement of students out of self-contained classrooms and out-of-district placements into regular classrooms, where they might or might not receive support from a specialist in the classroom or resource room setting. While this approach may appear to achieve the goals of equal access and integration, effective inclusion requires that certain conditions be in place. These include a student-centered, success-oriented philosophy; instructional approaches that foster cooperative learning and ensure that a wide range of

FIGURE 4

CURRENT PARADIGM FOR SCHOOLING	NEW PARADIGM FOR SCHOOLING
• Schooling is organized around time: curriculum is "covered"; instruction is paced by the schedule, and assessment occurs at "unit" intervals. The "inputs" and process of education are emphasized over "product", or results. Schools accept the failure of a significant number of students.	• The orientation to schooling is learning, achievement, and success. There is an emphasis on high levels of learning for all students. Diverse abilities, developmental levels, readiness, and learning styles are addressed so that all can succeed. The pace of instruction is based on learning, not how much content has to be "covered."
• Learning is organized around a standardized curriculum delivered in standardized time periods. Credentials are awarded based on "time-served", issued in "Carnegie Units."	• Learning is organized around what students should know and be able to do. Credentialing is based on student demonstration of proficiency in these knowledge and skill areas.
• The curriculum is derived from existing content, which is most often determined by textbooks. The curriculum is defined around a set of units, sequences, concepts, and facts.	• The curriculum is derived from standards that define what students should know and be able to do. Subject matter is "integrated" around "real-world" tasks that require reasoning, problem-solving, and communication.
• Assessment is done at the end of instruction and is narrowly focussed on lower-level and fragmented (end-of-unit) skills that can be assessed through paper-pencil responses. Grades are based on a cumulative averaging of performance over a fixed period of time. Norm-referenced standardized test results are the basis of accountability, through which, by definition, half of all students in a norm group will perform below average.	• Assessment is integrated with instruction and focusses on what students understand and can do. Assessment methods reveal students' actual competencies through demonstrations, portfolios of work, interviews, and other observational measures. Grades are based on culminating knowledge and competencies rather than an averaging of test scores. Criterion-referenced tests and performance-based assessments are used.
• School accountability is defined in terms of programs offered, attendance rates, and dropout rates; the number of students who are credentialed, and the results of standardized norm-referenced tests. There is minimal systematic monitoring of student progress on an ongoing basis.	• The school is accountable for ensuring and demonstrating that all students are developing proficiencies that represent high level standards for what students should know and be able to do. There is an emphasis on frequent monitoring of student progress.
• School improvement focusses on improving the existing organization, e.g., by adding new programs, improving school climate, and increasing staff participation in decision making.	• School reform efforts are challenging and seeking to change the assumptions and practices that characterize how schools are currently organized.

Center for Resource Management, 1994

resources, including computers are accessible to all students; a learner-driven curriculum that accommodates differences in student learning rates; appropriate in-class support; and opportunities for community-based experiences. Educational decision-makers involved in restructuring can also learn from methods emphasized in special education such as: individualized assessment and educational planning; modifying instruction and assessment to build on students' strengths; addressing post-school, "real world" requirements; planning for and supporting students through critical transition points; and involving parents in making decisions about their child's education.

The growing emphasis on student learning and educational results that now drives improvement in all areas (including special education) represents an important opportunity to overcome a long history of fragmented programs and services. Recognition of the enormous diversity that our students represent—in abilities, learning styles, language and culture, personal orientations, home situations, etc.—requires a level of individualization that traditional, "regular" education was not equipped to provide. By focussing on the levels of learning we want all our students to achieve, and by examining educational models in practice that demonstrate what is possible, we can move toward an empowering vision of education that achieves desired results.

Learner-based accountability recognizes that what we really mean by success for all students is success for each student: the school is accountable for ensuring that each and every student is making reasonable progress toward acquiring the knowledge, skills, and orientations that represent the standards for what students should know and be able to do. Learner-based accountability also means that the school is responsible for tracking the extent to which students with particular characteristics or who are exposed to specific programs and practices are succeeding. The ability to systematically monitor the progress of individual and specific groups of students, then, becomes essential to ensuring success. The question, then, is no longer whether to establish accountability systems based on learner outcomes, but how.

A Learner-Based Accountability System

The question of "how" to establish a learner-based accountability system is an important one because it raises issues about the purposes of accountability and the importance of ensuring that such systems are not narrowly focussed, but are responsive to the broader issues associated with ensuring excellence and equity for all students. Student outcomes have to be examined in the context of educational practice and the nature of opportunities that schools provide for students to learn—the question of why outcomes appear as they do has to be addressed (Darling-Hammond, 1989, 1991,and 1992, Oakes,1989). An accountability system has to incorporate methods for accessing and using ongoing information about student performance and school effectiveness as well as processes that reinforce the use of effective practices.

NCREST identified three building blocks of accountability as well as several key capacities that support the implementation of a comprehensive and effective accountability system. The core building blocks include: 1) a set of policies and procedures that encourage and support good teaching and valuable learning; 2) methods for regularly eliciting information that shows how the school is functioning for all students and that pinpoint what areas of the school context may be influencing the school's success or failure with individual students and various groups of students; and 3) mechanisms for rethinking and changing practices—in individual cases or in cases involving overall school functions—if students are not being well served.

Underlying the NCREST accountability model are fundamental elements of school and classroom practices that have very positive implications for all students, including students with disabilities and those with a range of diverse needs. These practices include the following.

- A school organization that ensures attention to students' needs and problems and brings coherence to teaching and learning.
- School policies and practices that "work both to provide an environment that is conducive to learner-centered practice and to identify and correct problems as they occur."
- School operations that "heighten the probability that good practices will occur for students; reduce the likelihood that harmful practices will occur; and provide internal self correctives in the system to identify, diagnose, and change courses of action that are harmful or ineffective."
- A set of processes for guiding practice and for using information to improve practice.
- Vehicles for staff interaction, shared inquiry, and continued learning that strengthen practice and create opportunities for continual evaluation and improvement of teaching.
- Forms of student assessment that reveal student strengths, talents abilities, and performance capacities.
- Feedback and assessment practices that prevent students from "falling through the cracks."
- "Incentives to encourage all members of the school community to focus continually on the needs of students and the improvement of practice."
- Systematic tracking of the progress of individual students or cohorts of students (rather than using aggregated averages of test score data) to determine the distribution of student achievement and school effectiveness.
- Evidence of the growth and progress of individual and groups of students over time—collecting and analyzing student performance data longitudinally to examine whether changes are the result of shifts in practice.
- Mechanisms that help schools continually evaluate how well they are meeting students' needs.

Creating Learner-Centered Accountability, NCREST, 1993

Using Management Information System Technology to Support Learner-Based Accountability

Putting learner outcomes at the center of school accountability is leading to more widespread recognition of the necessity for school-based capacity to systematically monitor student performance, and to evaluate the extent to which new approaches to curriculum, instruction, and assessment result in higher levels of student learning. However, while there is a growing body of educational research and practice literature on the many dimensions of school accountability at

both the policy and program levels, less attention has been given to how schools can develop the essential information system capacities that relate to learner-based accountability.

For years, researchers and practitioners have emphasized the limitations of aggregated measures of student outcomes which do not support an understanding of whether specific groups of students are benefitting from their educational experiences. New visions of learner-based accountability require school-level capability to demonstrate the outcomes achieved by various groups of students by disaggregating data (sorting information) so that results can be correlated with pertinent student, program, and educational process variables; i.e., being able to obtain information about the performance of students with particular characteristics, the programs and practices to which they are exposed, and the outcomes they achieve.

> *"The purpose for disaggregating student outcome data is to give the district and the individual schools a vehicle for evaluating their own effectiveness. The process seeks to identify the percentage of pupils in various subsets who achieve mastery of the essential learning at each grade level by program, course, school, etc. Through this analysis, a district and building can monitor whether students from all socioeconomic levels, different races, and both genders are mastering the essential student outcomes. Past experience verifies that such an analysis is one of the most critical steps in helping staff see the need for change. This analysis clearly shows whether the curriculum is being equitably learned by all students."*
>
> *". . . Disaggregation is a practical, hands-on process that allows a school's faculty to answer two critical questions: Effective at what? Effective for whom? It is not a problem-solving process but a problem-finding process."*
>
> *Lezotte and Jacoby, 1992*

The Center for Resource Management, Inc. (CRM) has conducted extensive research and development activities to determine the information system requirements of achieving school-level, learner-based accountability. This work involved hundreds of regular and special educators, parents, and community members, and drew from CRM's role in directing two major statewide school improvement initiatives in New Hampshire, from conducting school-level student outcome studies in more than 150 schools involved in school improvement and school restructuring projects in New Hampshire, South Dakota, and Colorado; and from evaluation studies that were funded under OSEP's State Agency/Federal Evaluation Studies (SAFES) Program. A key issue that cut across all of these projects was how state-of-the-art management

information system (MIS) technology can be used to build school capacity to systematically monitor student outcomes, demonstrate accountability, and implement continuous data-based program improvement. Areas that were examined include:

1. How schools currently access and use student performance data.
2. The requirements of creating an integrated school-level database of student performance data and other pertinent information.
3. The types of information that regular and special educators believe should be included in an accountability system.
4. The types of questions the system should address, and how data would be used by regular and special educators to improve student performance.
5. How relational database technology can be used to enable schools to disaggregate a wide range of pertinent data, and to link student performance data with demographic and programmatic information.
6. The training and technical assistance requirements of helping school staff develop skills that relate to effectively accessing and using information for monitoring, accountability, and ongoing improvement.

The research process highlighted that focussing on student outcomes and developing essential information system capability represents a major culture change for most schools. Access to and use of performance data are extremely limited, and the way information is stored does not lend itself to easy access or analysis. Student performance data and other pertinent information is typically located in a variety of places, or is routinely destroyed at the end of a school year. Administrative software packages most commonly used by schools were not designed to function as accountability systems. They create schedules, generate report cards, produce school and grade-level attendance reports, and in some cases, grade distributions for specific courses. They were not designed to disaggregate performance data or to correlate performance data with demographic or educational process variables. Schools, therefore, can't link student performance data to specific programs, practices, and policies. This has made ongoing internal evaluation impossible, and has created a long-standing dependency on external evaluation; that is, without the assistance of external evaluators, schools have not been able to systematically assess the

effects of changes they have made in programs, policies, and practices on student performance over time. Thus, at a time when educators are expected to demonstrate stronger program accountability, most schools struggle to produce data to answer the most basic questions about the performance of specific groups of students. In short, demonstrating results and linking results to specific programs, classroom practices, and grouping polices requires integrated recordkeeping approaches and information technology that very few schools have. The current status of school-level capability to access and use information for program improvement and accountability is summarized in Figure 5.

From discussions with more than 100 school teams that included both regular and special education administrators and teachers, parents, business and community leaders, and data processing personnel, several themes emerged that captured what practitioners and stakeholders want from a school-based information system. The system should:

- Function to promote a school culture that values and uses information, in contrast to data systems that seem complicated or irrelevant to school staff.
- Function to focus school planning and improvement activities on ensuring success for all students.
- Provide teachers and administrators with the data they need to monitor student progress in formats that lend themselves to decision-making.
- Enable schools to communicate results to pertinent constituencies in formats that can easily be understood by parents, school board members, and community groups.
- Enable schools to produce data that address school accountability questions about the performance of specific students.
- Help schools conduct their own program evaluations and reduce dependence on outside evaluators.
- Be comprehensive—account for the wide range of student, outcome, and process data relevant to school-based monitoring and accountability.
- Provide methods and technology for creating an integrated school database, and for easily accessing, aggregating, and disaggregating data.
- Present data so that practitioners perceive issues systemically and not simplistically.

FIGURE 5

STATUS OF SCHOOL INFORMATION AND RECORDKEEPING SYSTEMS

- School records aren't integrated which makes the compilation of essential information burdensome. Student performance and other data are located in a variety of places. Administrative software packages create schedules, generate individual report cards, and provide limited school and grade aggregation.
- Schools can't disaggregate data to monitor the performance of specific groups of students and the effects of school programs and practices on student performance over time.
- Current systems don't have the capability to compile performance-based assessment data at multiple levels—classroom, grade, and school levels or for specific student groups.
- Teachers and administrators don't have easy access to the data they need to systematically monitor student progress.
- Schools can't produce data to answer accountability questions and to communicate the progress and success of specific groups of students to key stakeholders.

- Be sufficiently flexible to address individual school characteristics, priorities, and diverse information needs.
- Be interactive with the administrative software used by schools to avoid redundant data entry.

These information system requirements represent powerful organizational capabilities for schools. They reflect key elements for bringing schools into the information age and for empowering school practitioners with information that directly relates to a mission of ensuring higher levels of learning for all students. To help schools acquire these capabilities, in 1990 CRM began the development of a school-based management information system (MIS) that creates an integrated school-level database and provides almost unlimited capability to disaggregate student performance data. In developing the system, it was recognized that it would have multiple components, and its quality and utility would be tied to the extent to which certain practical realities were addressed. It would have to address school staff training needs, provide resource materials, provide forms and procedures for easily and efficiently accessing manual data

from school records, and utilize MIS software technology to provide adequate data analyses capability. It would have to take into account existing computerized databases, such as those used to generate report cards; the resource constraints and other realities faced by schools; and the types of report formats that facilitate interpretation and use by administrators, instructional staff, parents, school board members, and other groups.

The challenge was to make the complex possible, and to produce an information system that could realistically be integrated into school operations to support ongoing data-based planning, monitoring, accountability, and program improvement. Schools do not need, nor will they accept, a system that is another "add-on" to an already burdened organization. Utilizing relational database software, a "user friendly" learner-based accountability system was developed that interrelates student, process, and outcome data elements, and provides school staff with the ability to not only address student outcomes, but also to address questions of why outcomes appear as they do. The system enables school administrators and instructional staff to use student outcome data in combination with other information to monitor student progress and improve school programs and instructional practices. Because of its emphasis on the use of information to improve student performance, the system is called the Student Profile System.

The Student Profile System creates a central record of all pertinent information from schools' manual and computerized recordkeeping systems. Because it utilizes relational database technology, it does not displace schools' current computerized systems, but has the capability to import data already entered into these systems to eliminate duplicate data entry and to create an integrated database. The Student Profile System was designed to be as flexible as possible. Standard field names can be easily modified to allow for the use of user terminology which varies somewhat across schools for certain data elements. Based on input from hundreds of regular and special educators, customized output reports (which are called profiles) were designed to display data in formats that facilitate ease of use by school staff. While the Student Profile System includes a set of standard profiles, the profile formats are designed as "templates" that can be applied to various types of data and analyses. By having access to an integrated database, special education administrators, principals, and other school staff have extraordinary

information capability at their fingertips. The key features of the Student Profile System are summarized in Figure 6.

FIGURE 6

KEY FEATURES OF THE CRM STUDENT PROFILE SYSTEM

THE STUDENT PROFILE SYSTEM:

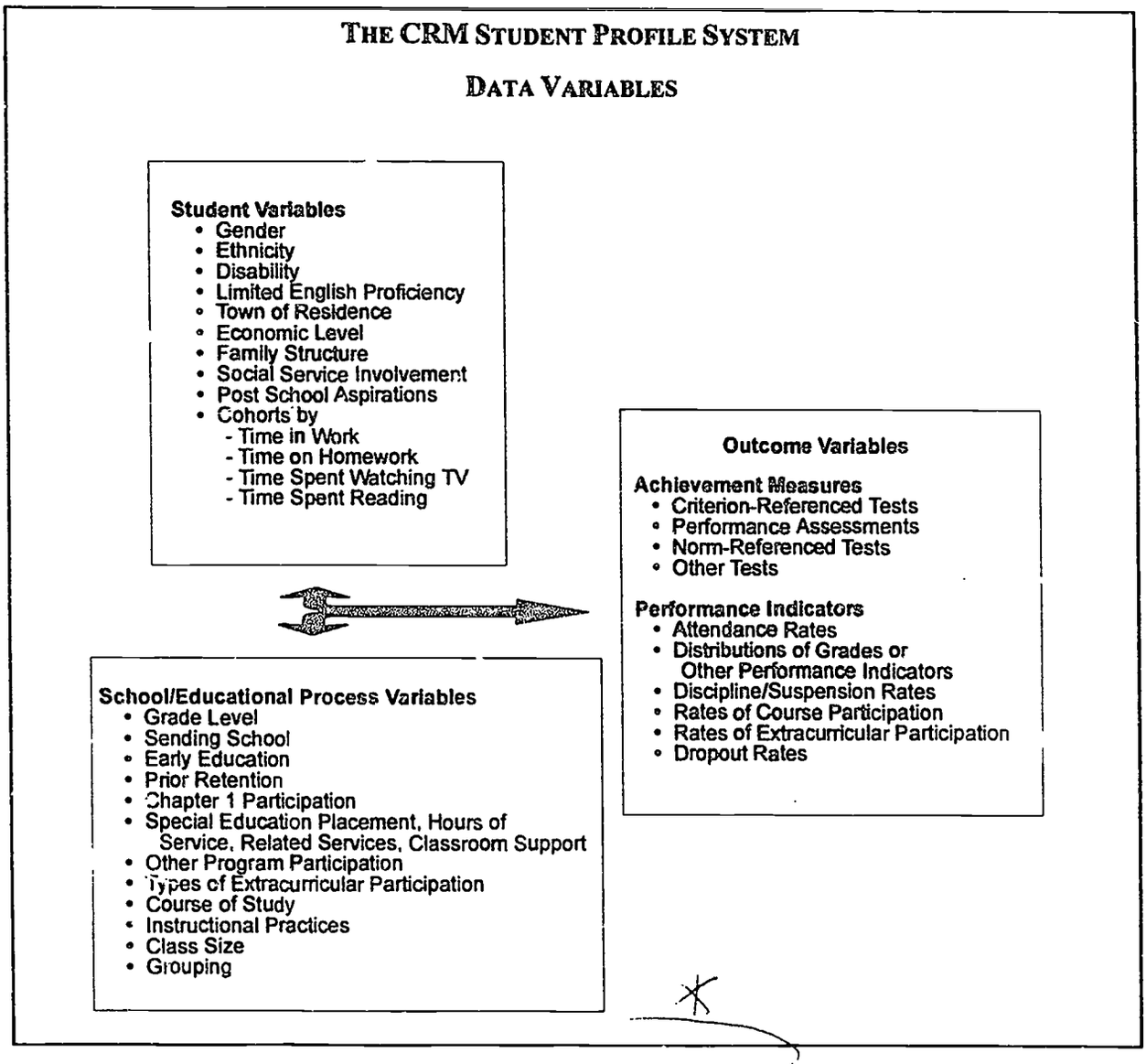
- Is a school-based information system that is customized to incorporate the characteristics, priorities, and diverse information needs of each school. Virtually any number of user-defined fields can be included to address the specific population, educational, and outcome variables the school wants to track.
- Creates an integrated database of the information needed to monitor student performance. Data includes student demographics, school and classroom processes, performance assessments, absence, discipline, and dropout rates, grade distributions, and test scores.
- Tracks the performance of special education students by school, grade level, disability, placement, specific special education services provided, number of service hours, and related services provided.
- Allows easy access to student performance data for ongoing use by teachers and administrators.
- Provides almost unlimited capability to disaggregate data so that schools can monitor the performance of specific student groups and the effects of school programs and classroom practices on student performance over time.
- Generates a wide array of reports (called profiles) on student performance in user-friendly formats for school staff and key stakeholders.
- Profiles performance-based assessment data at multiple levels—classroom, grade, and school levels—and for specific student groups.
- Is interactive with (can import data from) the administrative software used by schools.
- Allows schools to produce data that address school accountability questions about the performance of specific students.
- Helps schools develop site-based capacity to evaluate the effects of policies, programs, and practices on student performance over time.
- Focusses school improvement activities on increasing student achievement. School staff identify the factors that impact on performance, acquire performance data related to those factors, and develop the capacity to monitor progress and performance over time.

How Special Educators and Other School Staff Can Use a School-Based MIS to Support Student Learning, School Accountability, and School Improvement

A school-based MIS designed to support learner-based accountability can be an important vehicle for helping special educators and other school staff develop shared understandings (a common language) about pertinent outcome indicators and achievement data. The installation and use of such a system should start with staff consensus about the outcome data available to them that provides information about student success. School staff quickly recognize that monitoring student progress means being able to document success and also being able to pinpoint where the trouble spots are—determining which students are not succeeding, and what factors seem to be associated with high or low achievement. It is important that school staff have opportunities to identify the factors they feel might impact on student performance. These factors become the data variables that are tracked through the MIS. They may relate to demographic characteristics of students, students' prior educational experience, and their current educational experiences, including curricular programs, specific courses, special programs, special education placement and services, instructional practices, assessment methods, and grading criteria. Monitoring student progress, therefore, means being able to relate outcome data to pertinent population and educational variables. Having this capacity is essential to linking outcome data to specific policies, programs, and practices. School teams see the value and power of this capability. Figure 7 depicts the range of information identified by school teams that have been incorporated into CRM's Student Profile System.

The student variables represent groupings of students whose outcome data school teams want to monitor. For example, schools often want to examine the school performance of boys versus girls or of students from different ethnic groups. Some school teams have wanted to examine the performance of students from different economic levels or from different towns in a regional school setting. Because national studies are showing that students who read more on their own and spend more hours doing homework tend to achieve higher levels of proficiency than those who spend less time on these activities, some school teams have wanted to examine the relationship between student performance and these variables.

FIGURE 7



A relational MIS database also allows educational/process variables to be linked to student performance. School teams can then examine the outcomes of students who are in specific programs, placements, or courses of study. They can examine whether students who have been exposed to certain instructional practices or teaching styles are achieving higher levels of proficiency over time. The influence of class size or different types of grouping policies also can be systematically evaluated. An MIS is also an important tool for examining the effectiveness of inclusion for special education students. Special educators have wanted to monitor the performance of students in different types of placements and examine variations in performance

that may be linked to the amount of service hours provided. CRM is currently conducting a study under OSEP's SAFES Program that is examining the effects of various types of in-classroom support (such as special education staff co-teaching with classroom teachers, or the use of instructional aides) on the academic performance of special education students. The wide range of questions that can be answered by the data profiles generated through a school-based MIS is illustrated in Figure 8.

A school team from a regional high school participating in the NH Special Education Program Improvement Partnership wanted to explore the relationship between student success and factors such as students' long-term and short-term goals, and hours spent in work or watching television. This school provides an example of how a performance-based approach to monitoring can directly involve students in examining the factors that may be influencing their success or failure.

> An Advisor Program was established to provide students with a relationship with an adult who could assist in developing long-terms goals and to set short-term grade average goals. Working with their advisor and parents, students selected long term goals ranging from 4-year college to the "world of work", and specified the grade average they would work to achieve. To engage students in looking at factors that impact on success, the advisors administered a short survey that asked students how many hours per week they spend doing homework, watching television, and working. Students also were asked questions about their attitude toward school and self-confidence related to success in school.
>
> Because the Student Profile System was designed with student data as its base, long- and short-term goals and hours spent per week on various activities became population variables linked to each student. This allowed outcome data to be correlated and displayed for each of these variables, as well as for particular combinations (e.g., no homework or reading for pleasure), and the data profiles generated through the Student Profile System illustrated the difference in performance for each of these variables.
>
> A high school team comprised of regular and special education staff and the advisors involved students in examining the data profiles. They held discussions to help students gain a better understanding of how certain factors within their control (e.g. homework, working, reading, and television time) may impact on performance. Students also examined outcomes achieved by students according to various short- and long-term goals.

FIGURE 8

TYPES OF EVALUATION QUESTIONS ANSWERED BY A SCHOOL-BASED STUDENT PROFILE SYSTEM

Population Trends

1. What are the characteristics of the school population? Are there increases or decreases over time in the number of students with certain characteristics?
2. What are the characteristics of students-with-disabilities and what trends are occurring over time for this population?

Skill Development

3. Does the performance of the school population on various assessments indicate that students have developed adequate competencies in the skill areas assessed?
4. Are there particular skill areas where there is a high incidence of student success? Are there particular skill areas where many students are demonstrating below satisfactory performance?
5. Are there notable differences in the perfor-mance of specific groups of students?
6. Does the performance of students-with-disabilities on various assessments indicate that these students have developed adequate competencies in the skill areas assessed?
7. To what extent are classroom practices such as cooperative learning, team teaching, and heterogeneous grouping having a positive impact on skill development? What are the characteristics of students who are succeeding with these practices? Not succeeding?

Attendance, Discipline and Dropping Out

8. Which groups of students appear to be at risk of school failure based on a combination of excessive absence and discipline problems?
9. How many and what percent of the school population have been suspended or involved in disciplinary actions at least once? Three or more times?
10. Do the absence, discipline, or drop-out rates of any group of students indicate that there is problem that needs to be addressed for this group?
11. Are there trends in dropout data that indicate that particular groups of students appear to be at risk of not achieving future employment?

Course Participation

12. What is the participation rate of various groups of students in specific courses in the subject areas of Language Arts, Mathematics, Science, Social Studies, and Vocational Education?
13. What is the participation rate of students with disabilities in lower level courses? In advanced courses?

Grade Performance

14. How is the student population performing in the major subject/skill areas of Language Arts, Mathematics, Science, and Social Studies at all grade levels? What is the distribution of grades in these major subject areas?
15. Do grading patterns suggest any inconsistencies in criteria across subject areas? Classrooms? Within or across departments? At key transition points?
16. Does the grade performance of any group of students indicate they are at risk of cumulative academic failure?
17. How are students with disabilities in specific placements or programs progressing? Are students who are in integrated settings achieving satisfactory grades?

Participation in Extra-Curricular Activities

18. What is the participation rate of students in various school activities?
19. Are there notable differences in the participation rate of specific populations?

How a School-Based MIS Supports School-Level Implementation of the NCEO Framework

As discussed in a previous section, the National Center on Educational Outcomes (NCEO) developed a conceptual model of outcome domains, related outcomes, and possible indicators for each outcome. Outcome indicators are the actual data that schools can use to demonstrate the extent to which various outcomes have been achieved. For example, for the domain of Academic and Functional Literacy, the model proposes that students should demonstrate competence in the following five areas: communication; problem-solving strategies and critical thinking skills; math, reading, and writing skills; other academic and nonacademic skills; and using technology.

Schools seeking to monitor and demonstrate student progress against the above indicators must deal with measurement issues as well as accountability issues. The measurement issue is tied to the assessment methods used by schools through which students actually demonstrate competence. As discussed previously, there is widespread recognition that the use of norm-referenced tests and the narrow types of textbook-driven "end-of-unit" or "end-of-semester" assessment methods used by schools do not adequately assess student competencies, nor do they measure higher order communication, reasoning, and problem-solving skills. Thus, while standardized test data and grade performance data provide some evidence of student competencies, the evidence is insufficient. Monitoring and communicating to parents and other stakeholders the percent of students who actually demonstrate academic and functional competencies in the five areas identified in the NCEO model will require that statewide testing programs and schools become more proficient in the use of alternative forms of assessment that reveal students' real performance capacities. Current reform efforts are already showing this shift. Statewide assessment programs are rapidly shifting to the use of criterion-referenced measures. Schools are shifting toward teaching and learning practices that integrate assessment with instruction, focus on what students understand and can do, and draw upon the use of portfolios, performance demonstrations, and other observational measures to assess student proficiency.

The accountability issue is tied to the extent to which school information systems incorporate a sufficient array of student performance data that includes criterion-referenced, performance-based assessment data, and are capable of compiling and disaggregating data so that schools can monitor and demonstrate the progress of specific groups of students. Current information system technology can be designed to provide schools with these essential capabilities.

Figure 9 on the next page illustrates how a system such as the Student Profile System acts as a vehicle for helping schools implement conceptual models such as the one developed by NCEO by allowing schools to develop a longitudinal database to systematically track the percentage of students (for the total school population and designated sub-populations) who develop desired competencies over time. It enables regular and special educators to determine: the extent to which students in inclusive classroom settings are developing competencies that represent emerging visions of what students should be able to know and do; whether the special services provided to students enhance the development of desired competencies; and whether particular classroom practices have a positive impact on student success. Information system technology can effectively support an educational approach that emphasizes progress over process, and equity of opportunity and results. As such, it can support reform initiatives aimed at ensuring the success of each student.

FIGURE 9

IMPLEMENTING THE NCEO MODEL THROUGH A SCHOOL-BASED MANAGEMENT INFORMATION SYSTEM (MIS)

Excerpt from NCEO Model

ACADEMIC and FUNCTIONAL LITERACY

Examples of Outcomes	Outcome Indicators
Demonstrates competence in communication	a> Percent of students who use and comprehend language that effectively accomplishes the purpose of the communication
Demonstrates competence in problem-solving strategies and critical thinking skills	a> Percent of students who demonstrate problem-solving and critical thinking skills
Demonstrates competence in math, reading, and writing skills	a> Percent of students who demonstrate competence in math necessary to function in their current home, school, work, and community environments b> Percent of students who demonstrate competence in math necessary to function in their next environment c> Percent of students who demonstrate competence in reading necessary to function in their current home, school, work, and community environment d> Percent of students who demonstrate competence in reading necessary to function in their next environment e> Percent of students who demonstrate competence in writing necessary to function in their current home, school, work, and community environments f> Percent of students who demonstrate competence in writing necessary to function in their next environment

School-Based MIS

ARE DETERMINED

For the total school population and subgroups by

- Grade Level
- Gender
- Ethnicity
- Socioeconomic Level
- Disability
- Special Placement

Through the disaggregation of

- Criterion-Referenced Measures
- Performance Assessments
- Quiz Results
- Grade distributions in academic subjects

Results are Profiled for School Staff and Stakeholders

Data may be further disaggregated to determine the effects of

- Instructional Practices
- Institutional Practices
- Special Programs
- In-Classroom Support

ON STUDENT SUCCESS

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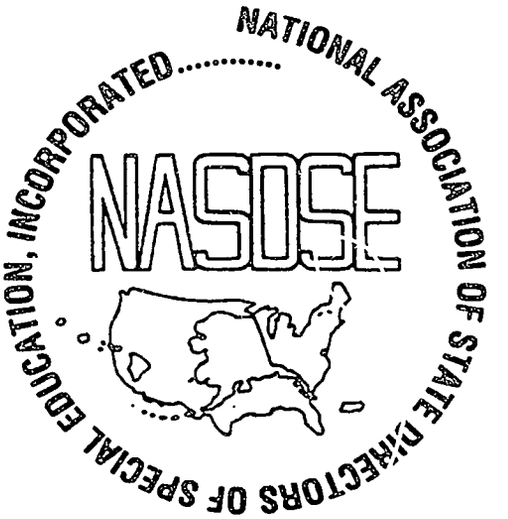
STATE COMPLIANCE MONITORING PRACTICES:

AN UPDATE

by Eileen M. Ahearn, Ph.D.



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National Association of State Directors of Special Education
1800 Diagonal Road, Suite 320
Alexandria, VA 22314

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FOREWORD

This report is the result of a study done under Project FORUM, a contract funded by the Office of Special Education Programs (OSEP) of the U. S. Department of Education and located at the National Association of State Directors of Special Education (NASDSE). Project FORUM carries out a variety of activities that provide information needed for program improvement, and promote the utilization of research data and other information for improving outcomes for students with disabilities. The project also provides technical assistance and information on emerging issues, and convenes small work groups to gather expert input, obtain feedback, and develop conceptual frameworks related to critical topics in special education.

The purpose of this analysis is to update and add to the information contained in a 1992 Project FORUM analysis of the results of a 1992 survey on state practices in compliance monitoring that also contained input from the Second National Conference on Monitoring held that year. A Third National Conference on Monitoring was held in November, 1994, and it involved the distribution of the results of another survey on state monitoring policies and practices that had been conducted by the Regional Resource Centers. This activity was included in Project FORUM's tasks for the 1994-95 year to provide State Directors of Special Education and others with important and timely information on this critical issue and especially to inform the debate that will be occasioned by the pending reauthorization of the Individuals With Disabilities Education Act.

STATE MONITORING PRACTICES: AN UPDATE

INTRODUCTION

The pending reauthorization of the discretionary programs of the Individuals With Disabilities Education Act (IDEA) has focused interest on the implementation of the act over the past twenty years. This analysis is intended to provide an overview of current policies and procedures that states use to oversee that implementation in their local school districts.

In December, 1992, Project FORUM issued a report entitled *Analysis of State Compliance Monitoring Practices* in which the information gathered at the 1992 National Conference on Monitoring and the results of a survey of state monitoring practices completed in that year by the Regional Resource Centers (RRCs) were analyzed and discussed. In November, 1994, the RRCs convened the Third National Conference on Monitoring and once again surveyed state monitoring practices. This documents is an update of the earlier report on state monitoring practices and is based on data from the more recent conference and survey. (Appendix A contains a copy of the survey form; a chart of survey results on selected items is included as Appendix B.)

This report consists of a brief background on the law and its requirements for monitoring, some child count statistics, and a description of specific monitoring practices in the states including the following: use of the self-study as part of the process, the composition of onsite visiting teams, cycles of review, the incorporation of measures of effectiveness and outcomes into the monitoring process, and other changes adopted recently by states. Also included is a brief profile of the unique aspects of five state monitoring systems. The report concludes with a discussion of current trends and proposals to improve monitoring practices at both state and federal levels.

BACKGROUND

Federal and State Monitoring Systems

The passage of P.L. 94-142 (Education of the Handicapped Act, since renamed the Individuals with Disabilities Education Act or IDEA) in November, 1975 marked the beginning of a far-reaching change in the interaction between State Departments of Education and the Local Education Agencies (LEA) or Intermediate Education Units (IEU) that deliver direct services to students with disabilities within the state. The law granted federal funds for providing special education services to students with disabilities and mandated new responsibilities for States to monitor how localities provide those services. Specific sections of IDEA and the regulations implementing it, as well as requirements in the Education Department General Administrative Regulations (EDGAR), contain responsibilities for Federal oversight, but §1412 of the Act contains the general provisions that authorize State monitoring of the provision of education to students with disabilities:

> The State educational agency shall be responsible for assuring that the requirements of this subchapter are carried out and that all educational programs for children with disabilities within the State, including all such programs administered by any other State or local agency, will be under the general supervision of the persons responsible for educational programs for children with disabilities in the State educational agency and shall meet education standards of the State educational agency. [20 U.S.C. 1412(6)]

Since 1975, both the U.S. Department of Education and State Departments of Education have developed monitoring systems to assess compliance with applicable statutes and regulations pertaining to programs and services for students with disabilities. Originally termed the Program Administrative Review and now referred to as a multi-faceted program review process, the series of activities used by the Office of Special Education Programs, Division of Assistance to States (OSEP/DAS) to determine the extent to which a State is in compliance with IDEA and related requirements include: an examination of documents (State Plan, annual performance reports, policies, etc.) and an onsite verification of the implementation of federal and state laws and regulations.

As described in the *Sixteenth Annual Report to Congress* (U.S. Department of Education, 1994, p. 173), monitoring procedures used by OSEP to evaluate each state's implementation of IDEA have evolved as a result of changes in the law and modifications in the strategies states use to meet their responsibilities under the law. Since their inception, however, monitoring procedures have involved both a documentation review and a visit to the state by a team of OSEP staff. Currently, OSEP staff carry out a pre-visit set of activities that include one or more public meetings held in the State and preparation for the onsite visit. During their week-long presence in the State, OSEP staff review state documents and interview state officials, visit selected schools and other public agencies, review IEPs and interview personnel responsible for programs for students with disabilities. As a part of each compliance review, OSEP assesses the state's procedures for monitoring local education agencies and intermediate education units. The entire process results in a written report that cites non-compliance and a corrective action plan to bring state policies and procedures back into conformity with federal requirements.

In the past, a draft of the monitoring report compiled by OSEP was submitted to the SEA for review with an opportunity for discussion of its contents before it was made public. However, in a memorandum (OSEP #94-19) issued on April 28, 1994, OSEP advised the states that, in accordance with a Presidential directive to ensure compliance with the Freedom of Information Act (FOIA), OSEP would henceforth make the Draft Monitoring Report available to the public in response to a FOIA request at the same time that it is released to the state.

OSEP requires that states include in their monitoring system the procedures necessary to determine their LEA's compliance with <u>every</u> state and federal requirement. Although there are variations among state monitoring systems, they have all developed a structure similar to the

federal approach. Some states add special components or vary the procedures as will be discussed below. However, in general, the monitoring process in states includes a review of records such as the LEA and/or IEU funding applications, complaint investigations, self studies, child counts and other data, some type of onsite verification of the implementation of policies and procedures, and the prescription of a correction process for any identified deficiencies.

Factors Affecting State Monitoring Systems

The design of monitoring procedures in a state is influenced by a number of factors including the size and geography of the state, the administrative structure, the number of school districts, the number of other entities that must be monitored, and the number of students with disabilities who receive special education. The RRC survey that will be discussed in detail throughout this report included items that captured some of these factors, and a summary of those data is included here to provide a basic context for the description of state monitoring systems.

Child Count: The total number of children found eligible and served by each state under its special education programs and services is collected in each state as of December 1st of each year.[1] The distribution of federal funds under IDEA is based on that child count. This number has increased every year since the implementation of IDEA. It is subject to audit and is often revised. However, in order to provide a general frame of reference for the size of state programs and the support provided by the federal government, the child count used for official notifications of funding issued by OSEP for the 12/1/91 and the 12/1/93 were reviewed and compared. The 12/1/93 total for each state is included in the survey data chart in Appendix B.

The IDEA child count increased by 362,205 between 12/1/91 and 12/1/93. The totals were 4,682,604 in 1991, and 5,044,809 in 1993 representing a 7.74 percent increase over that two year interval. Only three states registered a decrease during that period—Vermont (9.2%), Pennsylvania (1.8%), and West Virginia (0.4%), while three others—Alabama, Kentucky and North Dakota—had increases of less than one percent. The highest increase occurred in Nevada (23.4%), and the next highest set of increases ranging from 13 to 14 percent were in Georgia, Arizona, Alaska, Louisiana, New Mexico and New York.

Entities Monitored: Because the IDEA makes the state education agency (SEA) responsible for delivering a free appropriate education to students with disabilities, the SEA must have a plan to monitor the compliance of all providers with federal and state law and regulations, including school districts and others. The number of entities monitored refers to LEAs (local education agencies or school districts), IEUs (intermediate education units), other state entities (such as institutions maintained by other state agencies), and private programs or service providers. The child count and entities in each state are indicated in Table 1.

---

[1]Each state also counted and received separate funds for children served under the "State Operated Programs" section of Chapter 1 of the Elementary and Secondary Education Act until 1994 when the funds available under that law were transferred into IDEA and those children were then included in the IDEA count.

Table 1
Child Count and Number of Units to be Monitored - 1993-94

STATE	TOTAL CHILD COUNT 12/1/93	LEAs	IEUs	OTHER STATE UNITS	PRIVATE UNITS	TOTAL UNITS
AL	99,884	130	0	6	28	164
AK	18,006	54	1	1	0	56
AR	53,251	107	0	3	35	145
AZ	69,530	215	0	6	0	221
CA	553,930	1,150	0	18	0	1,168
CO	66,595	36	14	12	60	50
CT	75846	166	0	0	54	220
DE	15,196	16	0	3	0	19
FL	289,539	67	0	37	0	104
GA	123,143	184	0	43	12	239
HI	15,248	1	0	0	0	1
IA	63,400	390	15	3	5	413
ID	23,536	113	5	10	0	128
IL	257,986	0	96	3	0	99
IN	127,961	65	0	80	0	145
KS	50,441	304	41	14	11	370
KY	80,539	176	0	2	0	178
LA	86,931	66	4	3	0	73
MD	97,998	24	0	5	0	29
MA	160,275	354	0	0	150	504
ME	29,350	161	15	2	0	178
MI	181,251	536	57	5	0	598
MN	90,918	400	47	5	2	454
MS	64,153	153	0	10	17	180
MO	114,008	536	0	5	56	597
MT	18,771	235	0	0	0	235
NC	136,513	120	0	0	0	120
ND	12,440	0	31	3	3	37
NE	37,112	692	0	6	450	1,148

STATE	TOTAL CHILD COUNT 12/1/93	LEAs	IEUs	OTHER STATE UNITS	PRIVATE UNITS	TOTAL UNITS
NM	43,474	89	0	9	0	98
NV	25,242	17	0	1	0	18
NH	23,404	176	3	2	30	211
NJ	190,337	585	0	125	137	847
NY	365,697	714	38	29	113	894
OH	219,875	612	88	89	0	789
OK	73,131	554	0	3	0	557
OR	63,212	269	0	128	0	397
PA	210,826	501	0	0	0	501
RI	23,605	36	0	2	25	63
SC	81,930	91	0	23	0	114
SD	15,907	178	4	5	24	211
TN	119,146	139	0	35	47	221
TX	411,917	1,048	20	2	30	1,100
UT	51,950	40	0	2	4	46
VT	10,828	60	0	3	18	81
VA	135,060	136	0	52	58	246
WA	101,254	296	0	30	0	326
WV	44,538	55	0	9	0	64
WY	12,480	49	1	7	6	63

JURISDICTIONS:

AS	416	1	0	0	0	1
BIA	NA	23	0	0	0	23
CNMI	219	1	0	0	0	1
DC	7,009	1	0	2	57	60
FSM	5,380	4	0	0	0	4
GU	1,568	1	0	0	0	1
RMI	300	1	0	0	0	1
ROP	NA	1	0	0	0	1
VI	1,501	2	1	0	0	3

This listing of child count and entities to be monitored communicates some indication of the size of a state's monitoring job, but there are differences among states that must be noted in connection with these demographic data. In some states such as Illinois and Michigan, the monitoring of LEAs is organized through intermediate units and visits are planned on the basis of the cluster of districts that are part of each unit. The monitoring of private schools also differs: either they are monitored separately, or they are included as a part of the LEA or IEU in which they are located, or they are under the control and oversight of other state agencies.

CHARACTERISTICS OF STATE MONITORING SYSTEMS

A copy of the survey instrument, *Profile of State Monitoring Systems*, used by the Regional Resource Centers to gather information for the 1994 National Monitoring Conference, is contained in Appendix A. It included the same items as the 1992 survey with some added level of detail such as the breaking out of the total entities to be monitored into categories, and the addition of five new items: two about Part H, two about monitoring beyond requirements to include program effectiveness and student outcomes, and one on interagency agreements.

Responses were received from 49 states and nine of the 10 federal jurisdictions that are subject to the requirements of IDEA. The Wisconsin SEA could not respond to the survey because their monitoring system was undergoing a complete revision and decisions had not yet been finalized on many of the areas covered by the items.

It was not possible to analyze data reported for the three items that pertained to SEA staffing. It was learned through phone contacts with SEA personnel that SEA structure and staff responsibilities posed problems for those who responded, thus yielding what appeared to be discrepancies in the reported data. A variety of factors were found to have influenced responses to the staffing items. In many states, staff have assignments that cover more than one program area, so it is difficult to isolate the exact amount of time that is spent on monitoring. This differentiation is made even more difficult by the variations in what is defined by each state as part of the monitoring process. In some states, those who handle complaints are considered part of the monitoring staff, while in others this is a separate function. In addition, many SEAs see an overlap between monitoring and technical assistance for their LEAs and feel that there should not be a hard line drawn between these two functions. Given this lack of consistency in definition, no attempt was made to draw any conclusions from the staffing data.

Although there is much general similarity between state and federal monitoring systems, there are differences in the specific components that each state chooses to include

in its system. The variations that were discussed in the first report in 1992 included the composition of onsite monitoring teams, the use of focused/targeted monitoring, monitoring beyond federal requirements, and some other specific aspects of the monitoring process in states. The next section of this report covers issues related to two characteristics of monitoring systems that were not discussed in detail in the previous report—monitoring cycles and LEA self-monitoring—followed by data related to the revised items on monitoring beyond federal requirements. A brief update on some of the other characteristics of state monitoring systems discussed in the previous report is also included.

Monitoring Cycles

States usually divide the entities to be monitored into groups determined by the monitoring cycle which can be defined as the number of years between onsite visits that the state has adopted for its monitoring program. The average length of state cycles is 4.6 years and they range from a low of two years in Alabama, to a high of eight years in Ohio.

There are almost as many patterns for monitoring as there are states. Some states have designed a schedule of different activities related to monitoring that take place in each year of the cycle. The Colorado system is an example of this annually structured approach:

Year 1: LEA child count audit through a record review to check compliance with eligibility data and federal count reports;

Year 2: LEA submits a comprehensive plan by the LEA, and SEA reviews data collected on the LEA concerning complaints, hearings, and other matters;

Year 3: Comprehensive onsite visit to check compliance, determine local needs and provide technical assistance regarding program quality and effectiveness;

Year 4: Follow-up technical assistance by SEA for areas identified as corrective actions and compliance concerns during the onsite visit; and,

Year 5: Targeted onsite visitation to assure that the LEA has completed all corrective actions.

Some states have a variety of the multi-year schedule or another time design based on the various components of the monitoring system, while others concentrate most of their monitoring activity relative to each LEA into the year in which the district will be visited. However, even in states with the single year focus, follow-up to a corrective action plan and verification of the corrections usually extend beyond the year of the onsite visit. Many states describe monitoring as an ongoing, continuous activity.

A total of fourteen states reported changes in their monitoring cycles since the 1992 report. As Table 2 indicates, 12 states increased the number of years, while only two made their cycles shorter.

Table 2
Changes in Number of Years in State Monitoring Cycle

STATE	1992	1994
AL	5	2
AZ	6	5
CA	3	4
CT	4	5
ID	3	5
IL	5	6
KY	5	6
LA	3	4
MD	3	4
NE	3	5
NY	5	7
OH	3	8
OK	3	4
WY	3	5

Shaded rows = decreased cycles

LEA Self-Monitoring

According to survey responses, 25 out of the 49 responding states include self-monitoring by LEAs as part of their process. For some, it is a voluntary component of the process, but for others—or in certain circumstances—it is mandatory. Some states include a type of self-review within the LEA application for federal funding or in a mandated program plan that each LEA must submit to the state. However, states that include a self-study in the monitoring process consider it a separate element and provide specific forms or directions for the LEA to use in preparing its content. A completed self-review is always an integral part of the state's monitoring of the district.

The California Coordinated Compliance Review that monitors all specially funded educational programs including, in addition to special education, Chapter 1, vocational education, adult education gender equity programs and other school-based coordinated programs, is an example of a voluntary self-review as a monitoring component. According to state training materials, the purposes of the self-review are to have the LEA take responsibility for reviewing specially funded programs for compliance, take corrective action prior to state validation review, and identify areas in which assistance is needed from the Department (California Department of Education, 1994). The benefits mentioned as derived from the self-review since its initiation in the mid-80s include:

- The LEA gains an opportunity to correct identified non-compliance problems prior to the state validation review;
- The state validation review process is shorter when the local entity completes a self-review;
- LEA staff and community gain a better understanding of state and federal requirements; and,
- LEA staff and community feel better prepared and less anxious about the state validation review.

Self-evaluation is a required part of the Florida monitoring system: the LEA must undertake a review of critical components of their special education program. Work papers are provided to the LEA, which must "self-evaluate" at least one student record for each program area. The names of the students whose records are to be self-monitored are selected by the state, and the LEA must provide a summary of their findings from each file. The LEA's "Report of Self-Evaluation" is included as a part of the state's monitoring report.

A full year of self-study is part of the Kentucky monitoring system. The state provides training to encourage districts to spend an entire year evaluating their programs and completing the self-study that must be submitted by May 1st. The site visit takes place in the following school year, and the same instrument is used by the state to verify LEA compliance.

Monitoring Beyond Federal Requirements: Program Effectiveness and Student Outcomes as Part of the Monitoring Process

The 1992 RRC survey item that asked states if their monitoring went "beyond legal obligations" was expanded in the 1994 survey to two items that asked if the state went beyond legal obligations in the areas of program quality/effectiveness, and student outcomes/results. While 19 of the 49 responding states indicated that they included program quality or

effectiveness, only five said that they incorporate consideration of student outcomes/results in their monitoring process.

Some of the 19 states that responded positively to the item concerning *program effectiveness* as a part of their monitoring system provided brief details in the narrative component of the RRC Survey Report. For example:

- Idaho describes the major activity in year three of the monitoring process as an exemplary programs/effectiveness review that involves an onsite visit by personnel from other LEAs to verify the district's application for recognition.
- Nevada also includes a program effectiveness review as a required part of its monitoring system, suggesting that districts use a stakeholder model. Although Nevada districts can choose to use a model that differs from the one recommended by the state, they must submit a report of their program effectiveness activities to the SEA every three years.
- Louisiana also includes a quality indicators component as a part of the self-study process, but completion of this document is voluntary for LEAs.
- Michigan has piloted a set of quality indicators based on monitoring standards at the request of one of its intermediate school districts. The process is being refined and will be incorporated as an optional component of the Michigan system.
- Alabama noted that, when SEA staff identify a promising practice, the LEA is requested to prepare a summary that can be shared with other districts—a component of the review system known as "PSST or Practices Supporting Successful Teaching."

The five states that responded affirmatively to the item concerning *student outcomes* were California, Idaho, Maine, Texas and Vermont. Details about these items for California and Texas are contained in the next section that profiles distinctive monitoring systems in a few selected states. The other states are all in the process of trial implementation of various strategies to add this aspect to the monitoring process. For example, in four supervisory unions monitored in the 1993-94 school year, Vermont piloted a student outcomes component, and this segment will be added to three additional monitoring visits in the 1994-95 cycle.

Maine responded affirmatively to this item even though they do not gather specific data on outcomes as a part of monitoring. The SEA staff feel that the major purpose of monitoring, especially the examination of IEPs, addresses outcomes issues. Although it is not officially a part of their process, Maine's monitoring staff advised that they do discuss issues relative to the completion of goals, movement to less restrictive placements, and other types of outcomes information on monitoring visits to districts.

Composition of Monitoring Teams

Although States are not compelled by Federal statute or regulations to make formal compliance visits to LEAs or IEUs, the actual implementation of policies must be verified. As mentioned above, states have generally adopted a monitoring system similar to the federal process and that includes an onsite visit to verify the implementation of federal and state policies. Every state uses at least one representative of the SEA on each team, but the teams in 16 states are composed exclusively of SEA personnel. Aside from SEA staff, states use staff from other school districts such as special education administrators or teachers (LEA peers), parents from other LEAs, and/or others such as university faculty or contracted individuals. Table 3 displays the responses to the RRC survey items concerning types of individuals included on state teams. States that include all possible categories on their teams are shaded in the table.

Table 3
Composition of State Monitoring Teams

STATE	SEA Staff	LEA Peers	Parents	Others
AL	✓			
AK	✓			✓
AR	✓	✓		
AZ	✓	✓		
CA	✓	✓		
CO	✓	✓	✓	✓
CT	✓			
DE	✓			✓
FL	✓			
GA	✓			
HI	✓	✓		
IA	✓			
ID	✓	✓	✓	✓
IL	✓	✓	✓	✓
IN	✓	✓		✓
KS	✓	✓		✓
KY	✓	✓		✓
LA	✓	✓		✓
MD	✓			

STATE	SEA Staff	LEA Peers	Parents	Others
MA	✓			
ME	✓	✓		✓
MI	✓	✓		✓
MN	✓	✓		✓
MS	✓			
MO	✓	✓		
MT	✓	✓		✓
NC	✓	✓		
ND	✓			✓
NE	✓	✓	✓	✓
NM	✓			
NV	✓	✓		✓
NH	✓	✓		✓
NJ	✓			
NY	✓			
OH	✓			
OK	✓			
OR	✓	✓		✓
PA	✓	✓		✓
RI	✓	✓	✓	✓
SC	✓			
SD	✓	✓		
TN	✓			
TX	✓	✓		
UT	✓			✓
VT	✓	✓		✓
VA	✓	✓		✓
WA	✓			
WV	✓			
WY	✓			✓

The survey results show that some change has occurred in these data between 1992 and 1994. Three states—Maryland, Massachusetts and Wyoming— discontinued using LEA peers, while Kentucky added them to their teams; six states that had included parents no longer do so—Indiana, Louisiana, Massachusetts, Michigan, Minnesota and Montana—while Illinois added parents to their teams; seven states that had not previously used others on their teams—Alaska, Kentucky, Maine, Nevada, North Dakota, Virginia, and Wyoming—began including them, while six states—California, Maryland, Massachusetts, Missouri, Oklahoma, and South Dakota—no longer do so.

Usually, when an SEA includes LEA peers on a monitoring team, the appointment is for one visit or, as in Minnesota, the LEA peer is entered on a list of available personnel to be called on periodically for a monitoring assignment. Maine uses a different approach. The state "buys the contract" of three LEA administrators for a year and, in conjunction with one SEA representative, they comprise the monitoring team. The LEA administrators remain on their local payroll, so there is no interruption in their employment benefits. The SEA sees this strategy as very effective with the only drawback being the loss of the contracted people after they have acquired expertise in carrying out the monitoring process.

The methods used by states to train non-SEA team members vary. For example, Indiana offers a structured two-day training course four to six times a year and maintains a list of individuals who are trained and available for assignment to teams. This formal approach was tried and rejected by Colorado in favor of a more individualized approach in which the SEA program person who chairs the team is responsible for preparing the LEA personnel and parents who comprise the membership of each team. With assistance from the Great Lakes Regional Resource Center and input from other states, the Minnesota SEA designed a system that reflects their commitment to the use of a broad-based cadre of peer monitors. Individuals must apply to this program, and selection criteria are based on the SEA's goal of having a diverse pool of peer monitors who represent all types of constituencies. The program, first implemented in the fall of 1989, includes an intense training component for peer team members.

Non-SEA team members almost always have a specific role in the work of the team even if they are not involved in every aspect of the team process. The SEA representative is usually the team chairperson and is responsible for final compliance decisions and preparation of the report. LEA peers and other education professionals are usually assigned tasks that involve interviewing district personnel and gathering information from other sources about the district's programs and services. The role of parents on a team is usually focused on the assessment of parent-related issues in the district being monitored.

States that use non-SEA members on teams expressed strong support for this approach during the 1992 data collection. State personnel used terms such as 'field colleague' and

'significant others' to refer to these added individuals which communicated the importance attached to their participation. States that provided input on this issue cited many advantages and almost no disadvantages when asked for their perception of this practice. State monitoring staff said the use of individuals other than employees of the SEA on onsite monitoring teams helps to:

- focus the process on how a district serves children rather than just whether they meet the letter of the law;
- de-emphasize the negative and adversarial connotations that the monitoring process usually carries;
- supplement a small SEA monitoring staff allowing for more comprehensive and accurate evaluation of compliance in districts; and,
- provide positive public relations for the SEA with school personnel, parents and other community constituencies.

State monitoring staff singled out the use of LEA peers on monitoring teams as especially beneficial. They said that LEA peers:

- help to forge a partnership, changing the relationship between the SEA and the LEA or IEU;
- make the monitoring process more tolerable to local units because the peers are closer to current field experience and frequently have more credibility with school staff than SEA personnel;
- provide technical assistance to their colleagues even if only informally and foster the development of professional networking for program improvement; and,
- obtain a better understanding of compliance and learn ways to improve their own district's program.

Most SEA respondents felt that there were no disadvantages to the use of non-SEA members on teams. A few cited some problems that could occur, but in all cases they were not seen as significant. The difficulties (usually expressed as only theoretically possible and not actually encountered) mentioned by State monitoring personnel were:

- some non-SEA individuals do not understand compliance as a legal concept and this can interfere with their conclusions about LEA practices;
- the presence of non-SEA members on the team can lead to a 'we-they' division if a team member appears to 'side with' the LEA or IEU being monitored;
- sometimes non-SEA members are 'too tough' or 'too lenient' when it comes to making compliance judgments;
- some people have strong biases or personal issues that interfere with their ability to be objective about the LEA/IEU; and,

- managing a team composed of different types of members is not as easy as dealing with SEA peers who are familiar working partners.

Sanctions for Non-Compliance

The 1992 report noted that there was very little difference among states in the application of sanctions for LEA non-compliance. In the 1994 survey, only 17 of the 49 states replied affirmatively to the item, "We use sanctions other than fiscal sanctions." This number is seven fewer than the 1992 survey. Actually, there is little evidence that states use formal sanctions of any kind for compliance problems. States acknowledge their power to use fiscal sanctions, but this consequence is rarely invoked. Rather, SEAs negotiate the correction of problems, applying pressure through other means such as close follow up, additional onsite visits, and the targeting of technical assistance. Most states said that, although the threat of a loss of funds is an ever-present motivation for districts to comply, they do not consider the actual withholding of funds to be an appropriate sanction except in cases of continued refusal to implement corrective actions. However, many states do apply fiscal sanctions for any errors found in an LEA child count in which ineligible students had been counted for funding purposes.

One exception to this trend was found in North Carolina where the monitoring process was changed in the last year to combine the headcount audit and the program compliance visit. Monitors now have the authority to require payback of state and federal dollars from LEAs when a compliance violation is found, and the penalties are applied automatically.

PROFILES OF SELECTED STATE MONITORING SYSTEMS

Arizona

Arizona has used a variety of strategies in its monitoring system. About 20 years ago, the SEA used teams of LEA peers in its monitoring process and this was popular with school personnel. LEA team members found that serving on teams helped them assess their own compliance status and provided them with new program ideas. However, the SEA felt that this approach did not provide enough compliance data even though it yielded lots of information on program improvement. Teams were then limited to SEA staff specifically hired for monitoring, but that approach was also found to be unsatisfactory because of rapid

turnover of staff. Self-monitoring and "quality reviews" were used for a time, but this also was found to lack adequate validation of compliance.[2]

Five years ago, Arizona implemented a new monitoring system, the Collaborative Program Review (CPR), that is designed to be a part of overall education reform and school improvement. The rationale for the new system as stated by the SEA (Arizona Department of Education, 1993) is the need to balance the current procedural focus of special education accountability with an increasing emphasis on outcomes for students with disabilities. In addition, the SEA felt that the monitoring process excluded school district staff from participation and did not recognize the changing roles and responsibilities for both state and local educators and administrators.

Under the new system, a district may opt to participate in the CPR as an alternative to the standard monitoring review that is still available. Once a district is chosen, they are awarded a grant of $2,000 to make staff available to be a part of the newly-structured monitoring team that includes representatives from all general and special education sections of the LEA. This working group is trained by the SEA to plan and carry out the actual monitoring. They must develop a plan that includes the required components of the standard monitoring review and at least one element not related to compliance. SEA staff assist in the onsite visit, but the LEA team carries out all the monitoring activities including the writing of the report. Then, a program improvement plan must be developed in addition to a plan for correcting any non-compliance.

SEA staff agree that the CPR is not easier or cheaper to do than the traditional process. However, the involvement of general and special educators at the local level has had important benefits for the districts. The flexibility of the process makes it more responsive to individual district differences, and local special education administrators report more cooperation with general educators. In addition, there is increased recognition of the importance of compliance as a result of the new procedures.

California

In California, special education is but one component in a combined compliance procedure called the Coordinated Compliance Review (CCR) that addresses all specially funded programs including migrant education, adult education and other categorical programs.

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[2]North Carolina personnel also described their experience with "quality reviews" as problematic. Districts that had agreed to undergo such voluntary reviews were exempted from a compliance review. Among the reasons this practice was eliminated by North Carolina was the opinion of many local administrators that they needed the forceful consequences of compliance monitoring to use as leverage to obtain or protect the resources they needed for services for students with disabilities.

The visiting team has only one member representing special education and that place may be filled by either a SEA specialist or a professional educator who has been trained in the compliance process. A single report is issued, of which special education is only one part. The CCR occurs in two phases: the LEA self-review (described above on page 9) and the state validation review.

Two variations of the process are available for school districts that meet certain criteria. A screening review that involves a one or two-day visit by SEA staff is used to see if the district's self-review is accurate enough to be accepted as the official compliance review. To qualify, a district must have an enrollment of less than 20,000, have had a previous noncompliance rate of less than 8.62 percent, and have addressed past noncompliance findings. Document review is the other variation available to very small districts. A meeting is held with the district at a regional office to verify the self-review through written records. In both cases, a full validation review would follow if the abbreviated procedures suggest any significant deficiency or non-compliance.

LEA training and extensive materials are provided by the California SEA (California Department of Education, 1994) for the CCR. Two types of instruments have been devised: one to cover items that apply to more than one program, and a second that covers items specifically related to only one program. Compliance items are grouped under key strategies for each program goal, and guidelines are given on how to test for that particular compliance item and what specific materials or activities to review.

The CCR self-review includes a program item about student outcomes that, while not a compliance issue under special education, is nonetheless a required element. The particular goal is stated in the Training Manual as follows: "Multifunded students receive a coherent and coordinated program which enables them to learn the district's core curriculum." A suggested form is provided for the LEA to submit a summary of specific data as evidence of student learning. A positive evaluation is concluded when the district shows that students with disabilities are meeting the district's grade-level expectations in the core curriculum or that they are making significant academic gains that will lead to eventual grade-level performance.

New Jersey

The 1992 report described a new monitoring approach being implemented in New Jersey that involves a visit to every school district each year. This new approach is based on the premise that a close working relationship between the SEA and the LEAs eliminates the 'gotcha' aspect of monitoring. The goal of this new monitoring system is to form a positive partnership to improve programs and services for students with disabilities rather than concentrate only on non-compliance. A four-year program review cycle is used, with one-

quarter of the compliance requirements identified for attention each year. For example, one cluster of issues includes district policies and procedures, the utilization of federal funds, and due process hearings. During a school year, the state provides intensive training and technical assistance in these areas for all districts, and each district completes a self-study. The program review during the following school year consists of onsite and offsite activities to verify the self-study and to identify effective practices and programs. Corrective action plans are drawn up where needed and technical assistance is provided. During the year that all districts are reviewed on the first cluster of issues, training and technical assistance are provided on the second cluster of issues scheduled to be reviewed in the following year. This pattern is repeated throughout the four-year cycle.

According to New Jersey SEA staff, the new monitoring process has been received very positively throughout the state. Districts are making changes to address compliance problems before the onsite visit and there have been very few corrective actions prescribed as a result of onsite reviews. In fact, there was not one corrective action plan in the first year of implementation. The SEA staff also finds the process results in improved relationships with LEAs and the eliminaes the elaborate corrective action system.

Texas

Very little information was included in the 1992 report about Texas because the SEA was in the process of redesigning its compliance monitoring system. This design was the result of a federal monitoring visit which found Texas in non-compliance. Subsequently, the SEA completely revised its monitoring approach that is now known as the Results-Based Monitoring System (RBM). In addition to ensuring compliance, the new system design has two goals: to establish clear linkage between compliance and improved student performance, and to create collaborative relationships among SEAs, LEAs and ESCs (educational service centers).

As the first step in the RBM process, the LEA establishes a local review committee at both the school and district levels. This committee is composed of individuals from the entire range of LEA staff as well as non district individuals such as members of the local advisory group or personnel from other LEAs. The committee plans the review based on the structure of the special education program. One of the first activities is to gather information from parents. As with most of the review activities under the RBM approach, the method(s) to be used to obtain parent input is decided by the LEA. One option is using a representative sample of parents equal to the number of student eligibility folders reviewed during the local monitoring process. The LEA also determines which student folders will be chosen for the eligibility review, with the total number based on the average daily attendance of the district.

A minimum percentage of student folders based on the incidence levels in each disability categories must be included.

The local monitoring document (Texas Education Agency, 1993) provides extensive explanations and forms that cover the indicators to be used. There are 19 Program Excellence Indicators to identify practices that result in successful outcomes for all students, and 58 Compliance Indicators to be reviewed to verify that minimum federal and state requirements are met. The form for each excellence indicator poses the issue, lists the sources of documentation, and provides a five-point Likert scale for rating the district's current program in that specific area. The five criteria range from no evidence to high confirmation of implementation of the excellence indicator. Explanatory notes are provided to assist the reviewer in understanding the indicator and the scaled criteria. Similar forms are used for each of the 58 compliance indicators, except that the decision of the review is limited to a yes-no response rather than a rating.

Under the RBM system, the SEA will cite a discrepancy only when it occurs systematically throughout a campus, LEA or cooperative, more closely matching the process used in the federal monitoring system. The SEA will consider a number of factors to determine if the violation is systemic or a simple human error. As a general rule, a discrepancy will be cited when a violation is found in 30 percent or more of the folders reviewed. For violations of a more serious nature such as not conducting an assessment before placement, not developing an IEP for continued placement or any violation that impacts negatively on the appropriateness of the student's education, a citation will be made whenever a single violation occurs even if in only one student folder. LEAs must develop action plans for correcting compliance discrepancies and submit them to the SEA for approval, but the LEA has maximum flexibility in choosing the strategies to be used. The LEA is not required to submit corrective actions for the program excellence indicators.

Although the RBM indicators are still under review during this pilot implementation, the following is a sample of the excellence indicators, grouped under the seven strands, from the draft local monitoring document.

A. Family and Community Involvement:
   - Do families express an above average level of participation as partners in the educational process?
   - Does the LEA provide training to empower families to address factors that contribute to student success?

B. Student Eligibility:
   - Is a series of intervention strategies designed by qualified individuals tried prior to a referral for special education?

- Do assessment procedures provide information that allow goals to be developed that focus on student strengths?

C. Student Access:
- Do eligible students participate in all statewide mandated assessment measures as appropriate?
- Does the LEA administer alternative performance measures for students who are exempt form state mandated achievement tests?

D. Implementation:
- Do students who need modified/adapted texts and other materials receive them at the same time as their nondisabled peers?
- Are students with disabilities provided instruction in chronologically age-appropriate educational environments?

E. Transition:
- Are students with disabilities successful in transition to the next appropriate educational setting or to the community?

F. Support:
- Do districtwide committees seek input from and collaborate with representatives from the special education staff?
- Does the LEA use teacher/student support teams to ensure student success?

G. Program Evaluation:
- Has the LEA developed and implemented formal evaluation systems that use a variety of strategies to measure effectiveness?

The RBM system is now in its second year of pilot testing. The Texas SEA sees the it as a true shift in priorities moving away from a total process orientation to a focus on program excellence without neglecting compliance indicators.

DISCUSSION AND CONCLUSIONS

The results of the 1994 survey combined with information gathered from the Third National Monitoring Conference confirm that problems with compliance monitoring discussed in the 1992 report have not improved. Although a few states are trying to shift their monitoring emphasis away from a total concentration on input and process variables in order to incorporate outcomes variables, these efforts are too few to be considered representative and too recent to be evaluated as to their eventual impact on all states.

As noted in the 1992 report, federal standards for compliance are still not specified. OSEP has draft standards for monitoring that have been used as a guide for conducting pre-site and onsite activities relative to compliance. However, t' e word "standards" can be used in two ways in reference to monitoring: a) *monitoring standards* are the areas of state

programs to be reviewed and the documentation required for demonstrating compliance; and, 2) *compliance standards* are the specific levels that constitute acceptable conformity for each monitoring standard. For example, the IEP is used as evidence of a number of requirements including the provision of a free appropriate education (FAPE) for students with disabilities. What is the compliance standard that should be applied in judging the state's compliance with IEP requirements? If one error is identified on an IEP such as a missing parent signature, is that sufficient evidence to cite the state for non-compliance? OSEP advises that its intention is to focus is on systemic problems, but there are no consistently applied guidelines for making a finding in a specific area.

An analysis of compliance monitoring practices at the federal and state levels in the context of education for the 1990s and beyond indicates a need for a total re-examination of the monitoring system. The process has not changed significantly from the original monitoring procedures described in a memorandum entitled *Program Administrative Review Process: An Overview* issued in 1977 by the Bureau of Education for the Handicapped, the federal agency now known as the Office of Special Education Programs (National Association of State Directors of Special Education, 1977, p. 222-30). The many and varied changes being adopted as a result of the educational reform and inclusion movements should provoke a revision in the approach to monitoring and its position in the overall goal of improving education for students with disabilities.

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APPENDIX A: Survey Form

PROFILES OF STATE MONITORING SYSTEMS
REGIONAL RESOURCE CENTER PROGRAMS

Purpose:

This information is being collected to prepare a resource document for use by SEA staff responsible for developing and improving SEA program monitoring systems for infants, children and youths with disabilities. The 30-40 page product will include a matrix that serves as a quick index to the characteristics of state systems plus some contact and narrative information. The document will be distributed to all 60 states and jurisdictions currently receiving Federal Special Education funds and to other interested organizations and agencies.

Directions:

1. Please complete this form and add a brief narrative.
2. Your answers should describe your system as of March 15, 1994. If you plan to make changes, indicate so in item #40 and in the brief narrative.
3. Send or call in your responses to your Regional Resource Center contact person by **April 11, 1994.**

Contact Information:

Current Date: _____

State: _____

Name of Primary Contact for Monitoring: _____

SEA Unit: _____

Address: _____

City/ State/ Zip: _____

Phone#: _____ Fax#: _____

SpecialNet: _____ Internet: _____

Demographics:

1 Number of entities that must be monitored:
a)LEAs_____ b) IEUs _____ c) Other State Entities _____ d) Private Entities_____

2a IDEA child count taken December 1, 1993 for ages 3-21: _____

2b Chapter I child count taken December 1, 1993: ± _____

2c Total Child Count (IDEA + Chapter I): = _____

3 Name of agency that monitors Part H: _____

Staffing:

Full Time Equivalent (FTE) staff employed for monitoring (Note: 1.0 FTE might represent several people part time)

4a Located in SEA Central Office : _____FTE

4b Located elsewhere: _____(FTE)

5 Changes in number of monitoring staff (+ or - FTE) since March 1, 1993: _____

Personnel used as part of monitoring team(s) include:

6	SEA staff (regardless of office location)	Y	N
7	LEA peers	Y	N
8	Parents	Y	N
9	Others (e.g., IHE faculty, contracted personnel) (If yes, please specify in state narrative)	Y	N

Process and Materials

10	Our current cycle (in years) for comprehensive onsite visits is _____ years.		
11	Child count verification is part of our onsite process.	Y	N
12	We use focused/targeted monitoring. (If yes, briefly describe in state narrative)	Y	N
13	LEA self-monitoring is a part of our process.	Y	N
14	Our monitoring is conducted in conjunction with other SEA units	Y	N
15	Our monitoring is conducted in conjunction with the Part H Lead Agency	Y	N
16	Our monitoring goes beyond legal obligations to include program quality/effectiveness.	Y	N

17	Our monitoring goes beyond legal obligations to include student outcomes/results.	Y	N
18	We provide TA as a formal part of our monitoring process. (If yes, briefly describe in state narrative)	Y	N
19	We formally collect information from parents (e.g., via surveys, interviews, public forums).	Y	N
20	We use a computer database of LEA data of off-site monitoring.	Y	N
21	We use computers during on-site process.	Y	N
22	We generate our reports via computer (other than word processor).	Y	N
23	LEA application review is a part of our monitoring process.	Y	N
24	LEA policy/procedures review is a part of our monitoring process.	Y	N
25	LEA interagency agreements review is a part of our monitoring process.	Y	N
26	We use sanctions other than fiscal sanctions.	Y	N
27	We have written interpretative standards for assessing compliance.	Y	N
28	We have written criteria for selecting LEAs to be monitored.	Y	N
29	W have an instruction/training manual for monitors.	Y	N
30	We use a consistent sampling formula for selecting student records.	Y	N

Forms

31	We have standardized forms available for LEA adoption.	Y	N
32	We have and use an LEA policy and procedures review form.	Y	N
33	Our IEP record review form goes beyond compliance issues.	Y	N
34	We have and use interview forms designed specifically for monitoring.	Y	N
35	We have and use mail or telephone survey forms.	Y	N
36	We have and use a summary checklist (to integrate findings).	Y	N
37	We have and use a standardized monitoring report/narrative format.	Y	N

Changes

38	We have made adaptations in our monitoring system to reflect LEA/ Head Start collaboration.	Y	N
39	We have made adaptations in our monitoring process to address unique early childhood issues (Section 619/preschool, Part H to Part B transition)	Y	N
40	We are making or considering major revisions to our system.	Y	N

Narrative Summary

Please provide a summary of the key elements of your system, including information related to items (9, 12, 18) limiting yourself to approximately 300 words (attach an abstract if one has already been written and use extra pages if necessary). Please cover the following in your narrative: 1) Overview of the system (general procedures/approach). 2) Features that might be considered unique. 3) Changes being considered.

Please indicate materials on the following topics that you are willing to share on request:

_____a Materials that might help others improve systems of corrective action and technical assistance.

_____b Materials that might help others to use unique or "state of the art" techniques in monitoring (e.g., technology, linking cyclical with focused monitoring , databases).

_____c Materials that might help others to monitor the IEP.

_____d Materials that might help others to develop interpretive standards, define required documentation and/or maintain consistency among monitors.

_____e Materials that might help others with the issue of "monitoring and the school reform movement."

_____f Materials that might help other unitary SEAs (SEAs that are also LEAs) to conduct monitoring.

_____g Materials that might help others in monitoring for outcomes.

_____h Sample copies of technical assistance documents. (Please specify):

_____i. Other (please specify):

Please remember:

Send or call in your responses to your Regional Resource Center contact person by **April 11, 1994.**

APPENDIX B: Chart of Selected Survey Responses

Notes on the chart contained in Appendix B:

Some of the data contained in the original report of the RRC-conducted survey were discussed with SEA personnel and some revisions and additions were made available. The asterisks on the chart are explained as follows:

* Hawaii is a one-district state, so the number of LEAs is not applicable.

** In Michigan, intermediate units monitor their LEAs during the two years that the SEA does not monitor them. Each IEU has part-time staff assigned to this task approximately half time.

*** Massachusetts has 22 staff whose responsibility includes monitoring all program areas including special education, complaint management and technical assistance.

**** In New Jersey, every LEA is monitored every year on approximately one-quarter of the total requirements. This system is discussed more fully in the analysis section of the report.

It should also be noted that, because of time constraints and the difficulty in establishing contact to verify and discuss their responses, data for the 10 non-state jurisdictions was not included in the in the analysis narrative. The chart does contain the responses submitted by the nine jurisdictions that responded to the survey for the specific components covered in this report.

PROFILE OF STATE MONITORING SYSTEMS - 1994

STATE	AL	AK	AR	AZ	CA	CO	CT	DE	FL	GA	HI	IA
DEMOGRAPHICS												
LEAs monitored	130	54	107	215	1,150	36	166	16	67	184	°	390
IEUs monitored	0	1	0	0		14	0	0	0	0	°	15
Other state entities monitored	6	1	3	6	18	12	0	3	37	43		3
Private entities monitored	28	0	35			60	54	0	0	12		5
IDEA child count (12/1/93)	98,053	14,349	49,839	67,905	529,540	62,757	68,807	12,419	272,147	120,784	14,125	61,905
Chapter I child count (12/1/93)	1,831	3,657	3,412	1,625	4,390	3,838	7,039	2,777	17,392	2,359	1,123	1,495
Total child count (IDEA+Ch.I)	99,884	18,006	53,251	69,530	533,930	66,553	75,846	15,196	289,539	123,143	15,248	63,400
STAFFING												
Monitoring staff in SEA central office	10	3	8	8	7	3	4.5	6	4	6	9	1.5
Monitoring staff located elsewhere	0	0.25	3	5.5	2	0	0	0	0	0	0	0
Staff change since 3/1/93	0	0	0	0	0	0	0	1	0	0	0	0
COMPOSITION OF MONITORING TEAM												
SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	N	N	Y	Y	Y	Y	N	N	N	N	Y	N
Parents on monitoring team	N	N	N	N	N	Y	N	N	N	N	N	N
Others on monitoring team	N	Y	N	N	N	Y	N	Y	N	N	N	N
PROCESS AND MATERIALS												
Cycle for LEA onsite visits	2	5	3	5	4	5	5	4	4	5	3	3
Use focus/targeted monitoring	N	N	Y	Y	N	Y	Y	Y	N	Y	Y	N
LEA self-monitoring is part of process	N	N	N	Y	Y	Y	Y	N	Y	Y	N	N
Monitor in conjunction with other SEA units	N	Y	N	N	Y	N	Y	N	Y	N	N	N
Monitor in conjunction with Part H	N	N	N	N	N	Y	Y	N	Y	N	N	Y
Monitoring includes program quality/effectiveness	Y	N	N	Y	Y	Y	Y	N	N	N	Y	N
Monitoring includes student outcomes/results	N	N	N	N	Y	N	N	N	N	N	N	N
Formally collect information from parents	Y	Y	N	Y	Y	Y	N	Y	N	Y	Y	N
Use computerized LEA data for off-site monitoring	Y	N	N	N	Y	Y	Y	Y	Y	N	N	N
Use computers during onsite monitoring	N	N	N	N	N	Y	N	N	Y	Y	N	Y
Use sanctions other than fiscal	Y	N	Y	N	Y	N	Y	N	N	N	N	N
Have an instruction/training manual for monitors	Y	N	Y	Y	Y	N	N	Y	Y	Y	Y	Y
Use a consistent sampling formula for student records	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	Y
CHANGES												
Made changes to address early childhood issues	Y	Y	N	N	Y	Y	Y	N	Y	Y	N	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	N	N	N	Y	Y	N	Y	Y

PROFILE OF STATE MONITORING SYSTEMS - 1994

STATE	ID	IL	IN	KS	KY	LA	MD	MA	ME	MI	MN	MS
DEMOGRAPHICS												
LEAs monitored	113	NA	65	304	176	66	24	354	161	536	400	153
IEUs monitored	5	96		41		4	0	0	15	57	47	0
Other state entities monitored	10	3	80	14	2	3	5	0	2	5	5	10
Private entities monitored		0		11			0	150		0	2	17
IDEA child count (12/1/93)	22,256	213,184	119,629	47,481	79,516	84,853	93,236	138,136	28,459	166,049	88,111	63,425
Chapter I child count (12/1/93)	1,280	44,802	8,332	2,960	1,023	2,078	4,762	22,139	891	15,202	2,807	728
Total child count (IDEA+Ch.I)	23,536	257,986	127,961	50,441	80,539	86,931	97,998	160,275	29,350	181,251	90,918	64,153
STAFFING												
Monitoring staff in SEA central office	7	8	5	5	2	1	3	***22	5	2	6.5	14.1
Monitoring staff located elsewhere	4	7	0	0	0	4	0	0	0	**	0	0
Staff change since 3/1/93	2	0	(3)	(2)	(2)	0	1		2	0	1	1
COMPOSITION OF MONITORING TEAM												
SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	N
Parents on monitoring team	Y	Y	N	N	N	N	N	N	N	N	N	N
Others on monitoring team	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	N
PROCESS AND MATERIALS												
Cycle for LEA onsite visits	5	6	5	5	6	4	3-4	7	5	3	6	5
Use focus/targeted monitoring	Y	Y	Y	N	N	Y	Y	Y	N	Y	Y	Y
LEA self-monitoring is part of process	Y	N	N	N	Y	Y	Y	N	Y	Y	Y	Y
Monitor in conjunction with other SEA units	N	N	N	N	N	N	N	Y	N	N	N	Y
Monitor in conjunction with Part H	N	N	N	N	N	N	N	N	N	N	Y	N
Monitoring includes program quality/effectiveness	Y	N	N	N	N	Y	N	N	Y	Y	N	N
Monitoring includes student outcomes/results	Y	N	N	N	N	N	N	N	Y	N	N	N
Formally collect information from parents	Y	Y	Y	Y	N	N	N	Y	Y	N	Y	Y
Use computerized LEA data for off-site monitoring	Y	N	Y	Y	N	N	Y	N	N	Y	Y	N
Use computers during onsite monitoring	Y	N	Y	Y	N	N	N	N	N	Y	Y	N
Use sanctions other than fiscal	N	N	N	Y	N	N	N	N	N	Y	Y	Y
Have an instruction/training manual for monitors	N	Y	Y	Y	N	Y	Y	N	N	Y	Y	Y
Use a consistent sampling formula for student records	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y
CHANGES												
Made changes to address early childhood issues	Y	N	Y	Y	Y	N	Y	Y		N	Y	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y

PROFILE OF STATE MONITORING SYSTEMS - 1994

STATE	MO	MT	NC	ND	NE	NM	NV	NH	NJ	NY	OH	OK
DEMOGRAPHICS												
LEAs monitored	536	235	120		692	89	17	176	585	714	612	554
IEUs monitored				31				3	0	38	88	
Other state entities monitored	5			3	6	9	1	2	125	29	89	3
Private entities monitored	56			3	450			30	137	113	0	
IDEA child count (12/1/93)	110,211	18,263	135,067	11,942	36,238	43,178	24,624	21,652	185,844	346,863	215,090	71,169
Chapter I child count (12/1/93)	3,797	508	1,446	498	874	296	618	1,752	4,493	18,834	4,785	1,962
Total child count (IDEA+Ch.I)	114,008	18,771	136,513	12,440	37,112	43,474	25,242	23,404	190,337	365,697	219,875	73,131
STAFFING												
Monitoring staff in SEA central office	10	3	3	1	2.5	4	0.33	0.33	ooo4	2	13	9
Monitoring staff located elsewhere	1	0	0	0	2			0.66	8	45	0	6
Staff change since 3/1/93	(1)	0.25	(2)	0	0			(0.66)	0	(2)	0	8
COMPOSITION OF MONITORING TEAM												
SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	N	Y	N	Y	Y	N	N	N	N
Parents on monitoring team	N	N	N	N	Y	N	N	N	N	N	N	N
Others on monitoring team	N	Y	N	Y	Y	N	Y	Y	N	N	N	N
PROCESS AND MATERIALS												
Cycle for LEA onsite visits	5	5	5	5	5	3	3	5	ooo	7	8	4
Use focus/targeted monitoring	Y	N	N	N	Y	N	N	N	N	Y	Y	N
LEA self-monitoring is part of process	N	N	N	N	N	N	Y	Y	Y	N	Y	N
Monitor in conjunction with other SEA units	Y	N	N	N	N	Y	N	N	N	Y	N	N
Monitor in conjunction with Part H	N	N	N		Y	Y	N	N	N	Y	N	N
Monitoring includes program quality/effectiveness	N	N	N	Y	N	N	Y	N	N	Y	Y	N
Monitoring includes student outcomes/results	N	N	N	N	N	N	N	N	N	N	N	N
Formally collect information from parents	N	Y	N	Y	N	Y	Y	Y	Y	N	N	Y
Use computerized LEA data for off-site monitoring	Y	N	N	N	Y	N	N	Y	Y	Y	Y	N
Use computers during onsite monitoring	N	N	N	Y	N	Y	N	Y	Y	Y	N	N
Use sanctions other than fiscal	Y	N	N	N	N	Y	N	Y	Y	N	N	Y
Have an instruction/training manual for monitors	Y	Y	N	Y	N	N	Y	Y	Y	Y	Y	Y
Use a consistent sampling formula for student records	Y	N	Y	N	Y	N	Y	Y	Y	Y	N	Y
CHANGES												
Made changes to address early childhood issues		N	Y	N	N	N	Y		N	N	N	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	N	N	N	Y	Y	Y	Y	Y

P E OF STATE MONITORING SYSTEMS - 1994

STATE	OR	PA	RI	SC	SD	TN	TX	UT	VT	VA	WA	WV	WY
DEMOGRAPHICS													
LEAs monitored	269	501	36	91	178	139	1,048	40	60	136	296	55	49
IEUs monitored	0				4		20		0		0		1
Other state entities monitored	128		2	23	5	35	2	2	3	52	30	9	7
Private entities monitored			25		24	47	30	4	18	58	0		6
IDEA child count (12/1/93)	52,288	187,323	22,096	79,908	15,208	115,601	396,160	49,985	9,182	131,133	96,667	42,577	12,029
Chapter I child count (12/1/93)	10,924	23,503	1,509	2,022	699	3,545	15,757	1,965	1,646	3,927	4,587	1,961	451
Total child count (IDEA+Ch.I)	63,212	210,826	23,605	81,930	15,907	119,146	411,917	51,950	10,828	135,060	101,254	44,538	12,480
STAFFING													
Monitoring staff in SEA central office	18	5	5	4	2.4	4	15	1	2	8	1	4	2.5
Monitoring staff located elsewhere	0	0	0	0	3.5	9	5	4	0	0	1	0	0.5
Staff change since 3/1/93	0	0	0	0	0	4	2	0	0	(4)	(1)	0	0
COMPOSITION OF MONITORING TEAM													
SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	N	Y	N	Y	N	Y	Y	N	N	N
Parents on monitoring team	N	N	Y	N	N	N	N	N	N	N	N	N	N
Others on monitoring team	Y	Y	Y	N	N	N	N	Y	Y	Y	N	N	Y
PROCESS AND MATERIALS													
Cycle for LEA onsite visits	6	6	5	4	4	5	5	3	5	5	3	4	5
Use focus/targeted monitoring	N	Y	N	N	N	Y	Y	N	Y	N	N	Y	N
LEA self-monitoring is part of process	N	Y	N	Y	N	Y	Y	N	Y	N	Y	N	N
Monitor in conjunction with other SEA units	Y	N	N	Y	N	N	Y	N	N	Y	N	Y	N
Monitor in conjunction with Part H	Y	N	N	N	N	N	N	N	N	N	N	N	N
Monitoring includes program quality/effectiveness	N	N	N	Y	N	Y	Y	Y	N	N	Y	N	N
Monitoring includes student outcomes/results	N	N	N	N	N	N	Y	N	Y	N	N	N	N
Formally collect information from parents	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y
Use computerized LEA data for off-site monitoring	Y	Y	N	N	N	N	Y	Y	N	Y	Y	N	N
Use computers during onsite monitoring	Y	N	N	N	Y	N	N	Y	N	Y	Y	N	N
Use sanctions other than fiscal	N	Y	N	N	Y	Y	Y	N	Y	N	N	Y	N
Have an instruction/training manual for monitors	Y	Y	N	Y	Y	N	Y	Y	Y	Y	Y	N	Y
Use a consistent sampling formula for student records	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	N	N
CHANGES													
Made changes to address early childhood issues	Y	N	N	Y	Y	N	N	Y	N	N	Y	N	N
Making or considering major revisions in monitoring	N	N	Y	Y	N	N	Y	N	Y	Y	Y	Y	N

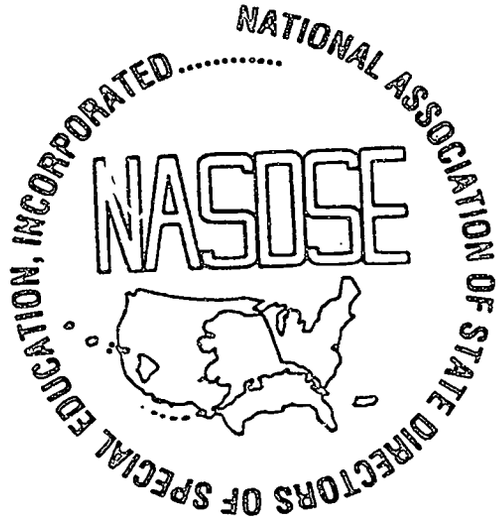
E OF STATE MONITORING SYSTEMS - 1994

STATE	AS	BIA	CNMI	DC	FSM	GU	RMI	ROP	VI
DEMOGRAPHICS									
LEAs monitored	1	23	1	1	4	1	1	1	2
IEUs monitored	NA		NA			NA	NA	NA	1
Other state entities monitored	NA		NA	2		NA	NA	NA	
Private entities monitored	NA		NA	57		NA	NA	NA	
IDEA child count (12/1/93)				2,055					
Chapter I child count (12/1/93)				4,939					
Total child count (IDEA+Ch.I)	0	0	0	6,994	0	2	0	0	0
STAFFING									
Monitoring staff in SEA central office	0.25	4	1	8	0.75	2	1.5	0.5	1
Monitoring staff located elsewhere	0	1	0	0	0.25	0		0	1
Staff change since 3/1/93	0	0	0		0	0		0	
COMPOSITION OF MONITORING TEAM									
SEA staff on monitoring team	Y	Y	N	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	N	N	N	Y	Y	N	N	N	N
Parents on monitoring team	N	N	N	Y	Y	N	N	N	Y
Others on monitoring team	N	N	N	Y	Y	N	N	N	Y
PROCESS AND MATERIALS									
Cycle for LEA onsite visits	3	3		2-3		3	1	1	2
Use focus/targeted monitoring	N	N	Y	N	N	Y	N	N	Y
LEA self-monitoring is part of process	N	Y	N	Y	Y	Y	N	N	Y
Monitor in conjunction with other SEA units	N	Y	N	N	Y	N	N	N	Y
Monitor in conjunction with Part H	N	N	N	N	N	Y	Y	Y	N
Monitoring includes program quality/effectiveness	N	N	Y	N	Y	Y	N	N	Y
Monitoring includes student outcomes/results	N	N	Y	Y	Y	Y	N	N	Y
Formally collect information from parents	N	Y	N	Y	Y	Y	Y	Y	Y
Use computerized LEA data for off-site monitoring	N	N	N	N	Y	Y	N	N	Y
Use computers during onsite monitoring	N	Y	N	N	Y	Y	N	N	N
Use sanctions other than fiscal	N	Y	N	Y	Y	Y	N	N	Y
Have an instruction/training manual for monitors	N	Y	N	Y	Y	N	Y	Y	Y
Use a consistent sampling formula for student records	N	Y	Y	Y	Y	Y	N	N	Y
CHANGES									
Made changes to address early childhood issues	N	N	N	N	N	N	N	N	N
Making or considering major revisions in monitoring	N	Y	Y	N	N	Y	Y	Y	Y

A FRAMEWORK FOR ACCOUNTABILITY:
Concepts, Approaches, and Issues

by Edward J. McCaul, Ed.D.

A Background Paper Prepared for the National Center on Educational Outcomes
Seminar on Accountability for the Education of All Children



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Virginia

A FRAMEWORK FOR ACCOUNTABILITY:
Concepts, Approaches, and Issues

By Edward J. McCaul, Ed.D.

Introduction

During the latter part of the 1980s, public education has been the focus of considerable attention and concern. Since "A Nation At Risk" was published in 1983, many State-level efforts to reform and improve public education were initiated, and the Federal government proposed its "America 2000" strategy with six national education goals. With the promulgation of these goals, a clear need arose for measuring student progress and performance. In addition, international achievement tests revealed an increasing achievement gap between U.S. students and those of other lands.

These developments have led to a growing emphasis on the *results* of the educational process and the *student outcomes* that the process yields. In recognition of this new concern with student outcomes, the Office of Special Education Programs (OSEP) established the National Center on Educational Outcomes (NCEO) at the University of Minnesota. In a subcontract with NCEO, the National Association of State Directors of Special Education (NASDSE) seeks to provide support for the work of NCEO, particularly in the areas of accountability and State-level policy, and to collaborate with State Directors of Special Education in identifying and analyzing critical issues regarding educational outcomes for students with disabilities.

Discussions with State Directors have indicated that the issues of special education accountability are becoming increasingly important. Along with the focus on outcomes, the idea of holding educators accountable for results has gained support (Clark & Astuto, 1989; Kirst, 1990). Many States are struggling with fiscal crises that involve tough decisions about the allocation of resources. Special education budgets are particularly vulnerable to attack given the rising costs of special education and a resulting "backlash" of public opinion against special education (Zirkel, 1990). Other concerns include the growth of students identified as learning disabled, the increasing concern over what constitutes an "appropriate" related service, and some evidence that suggests many students with disabilities experience poor educational outcomes. Given these circumstances, accountability regarding special education programs and services becomes vitally important and special education policymakers are asking questions such as: How do we hold local programs accountable for results? What are the basic elements of an accountability system? What types of systems are States currently using to ensure accountability?

The Outcomes Project at NASDSE convened a planning meeting during the summer of 1992 to design activities to address issues regarding the development of fair and effective State-

level accountability systems. Participants included representatives of NCEO, the Center for Policy Options, the Office of Special Education Programs (OSEP), and a State Director of Special Education. One component of the workplan developed at this meeting culminated in the development of this report.

This report provides an overview of issues regarding the development of State-level systems of accountability, a description of some core elements for accountability systems, and an examination of the accountability systems in selected States. Specifically, it is divided into the following sections: (1) a working definition, (2) a review of the concepts of accountability provided in the literature, (3) a discussion of factors involved in designing accountability systems, (4) a brief overview of issues regarding special education, (5) a description of accountability systems in selected States, and (6) a conclusion and recommendations.

Definition

As defined by Webster, to be accountable is to be "subject to giving an account: answerable." This seemingly simple definition belies the substantial, and sometimes ominous, overtones that the term "accountability" has taken on for the educational community.

The idea of holding educators answerable for results is not a new one. As early as the beginning of the century when the factory model of education was in vogue, school reformers discussed the need for schools to turn the "raw material" of students into the "end products" of educated citizens. In 1916, Cubberly stated:

> Our schools are, in a sense, factories in which the raw products (children) are to be shaped and fashioned into products to met the various demands of life. The specifications for manufacturing come from the demands of the twentieth-century civilization, and it is the business of the school to build its pupils according to the specifications laid down. This demands good tools, specialized machinery, continuous measurement of production to see if its is according to specifications, the elimination of waste in manufacture, and a large variety in the output (cited in Hanson, 1985, p. 24).

Concepts of accountability have evolved substantially since Cubberly's era. According to Hanson (1985), the 1970s ushered in a new era of "accountability." However, as a result of the publication of A Nation At Risk during the 1980s and subsequent reports about the status of American public education, issues of accountability have emerged as major themes for public education in the 1990s (Kirst, 1990; Rebarber, 1991). The section below discusses some of the different concepts of accountability presented in the literature.

Concepts of Accountability

In 1974, Henry Levin provided an overview and comprehensive discussion of issues related to accountability in education, and he anticipated many of the current concerns over educational productivity and student outcomes. Levin offered one of the earliest conceptual frameworks of accountability; specifically, he viewed accountability as assuming one or several of the following different forms:

- As **performance reporting** in which periodic reports are issued over the attainments of schooling. These reports may be based on financial or student performance results or both. An assumption is that by providing performance information, accountability will be enhanced.

- As a **technical process** in which the problem is viewed as "delivering the goods at a reasonable cost." This approach emphasizes standardization, contracting for performance, and elimination of unproductive staff (usually teachers or local administrators). It may involve a "cost-benefit analysis" of educational services.

- As a **political process** in which schools are seen as the result of what a particular constituency or constituencies desire. Various coalitions compete for control over the school processes and outcomes, and the most powerful constituency holds sway.

- As an **institutional process** in which the current "class structure" becomes reproduced. Advocates of this viewpoint often support "deschooling" through the abolishment of compulsory attendance and a major overhaul of our society and schools.

In Levin's view, true educational accountability is difficult, if not impossible, to achieve due to conflicting political pressures on schools and the power of the "educational professionals themselves" in the process of shaping public schools. Further, to be truly accountable, schools would need a consensus on the educational outcomes of schooling. Levin views outcomes as falling into two areas: (1) proximate, the immediate and tangible results of schooling such as enhanced achievement test scores; and (2) ultimate in terms of the social benefits and costs to society. Levin argues that there is a lack of clear consensus on these outcomes and further that "we're on exceedingly shaky ground when we try to translate educational outcomes into social outcomes since the latter are generally considerably removed in time and space from the former, and a dynamic social, political, and economic structure is likely to alter these relationships over time" (P. 387). And, of course, educators have articulated the objectives of schooling as enhancing these ultimate goals.

In delineating these complex relationships among political processes, educational inputs, and educational outcomes (both proximate and ultimate), Levin concluded that:

> Perhaps the most important implication of this review is to suggest that a significant tightening of the accountability linkages in education is probably impossible without substantial changes in the governing processes and organization of the educational sector. Yet educators are fond of talking about accountability as a technical problem which does not require any major restructuring of institutions. Such a viewpoint may place the educator at center stage in the accountability movement, but it is not likely to make much of a difference in the overall functioning of the schools or society (p. 388).

While Levin's work has provided a foundation for other discussions of accountability (e.g., Kirst, 1990), other frameworks for accountability have been offered. Darling-Hammond and Ascher (1991) addressed issues of accountability facing "big city schools", and they argued that there are at least five types of accountability systems being used:

> *Political accountability* through the election of legislators and school boards.
>
> *Legal accountability* through cases involving the accountability of school systems for desegregation or provision of equal opportunity.
>
> *Bureaucratic accountability* through State and district education offices enacting and monitoring compliance with rules and regulations.
>
> *Professional accountability* through teachers and other school staff acquiring professional knowledge and adhering to professional standards of practice.
>
> *Market accountability* through parents and students choosing the schools that they believe are effective and meet their particular needs (p. 3).

The authors argue that the two most prevalent forms are *legal* and *bureaucratic* accountability, but that these two forms may have "overextended their reach" and become less useful. They stated that "if school indicators are improperly designed or unintelligently used, they can actually undermine accountability" (p. 2).

Kirst (1990) also described a framework for accountability. He argued that six broad approaches to accountability that were being used in education:

- Monitoring may be used to assess levels of compliance with standards or regulations.

- Reports of student performance (e.g., district and school State achievement test results) may be published.
- Systems that provide incentives may be developed.
- A "free market" approach may be used to provide accountability.
- Changing the locus of authority or control of schools may be used to designate ownership and responsibility for the achievement of results.
- Changes in professional roles may help to enhance accountability (p. 1).

As Kirst described the approaches listed above, he noted a reliance on business as the model for educators to emulate, on "objective measures" to evaluate student performance, and on accounting procedures and cost control as methods for improving education (p. 4). Clark and Astuto (1989) argued that accountability procedures such as those listed above are consistent with the Federal policy on education through the years of the Reagan and Bush administrations. These authors also argued that the public favors businesslike "quality control" types of accountability approaches such as a standard nationwide exam to obtain a high school diploma, a State board examination for teachers, and the raising of academic standards (p. 16). According to Clark and Astuto, the public favors greater competition and believes that State-by-State comparisons would serve as incentives to local schools for improving their performance. They also believe that the public favors parental choice programs (p. 17).

Approaches to educational accountability that emphasize the financial "bottom line" have traditionally been viewed with suspicion by many special educators. The origins of current special education laws are rife with stories of children with disabilities being excluded from public schools because of the "excessive cost" of their education[1]. Attempts to model schools after businesses and to make them more "cost effective" may be viewed by special educators and advocates as threatening the provision of high cost services and accommodations necessary for children with disabilities to have equal opportunity to benefit from public education. As discussed later, however, there have been some attempts to conduct "cost-benefit" analyses of special education services.

[1] The testimony presented before Congress during the hearings on P.L. 94-142 contain numerous stories to this effect. (See, for example, Alexander & Alexander, 1980)

Factors in Designing Accountability Systems

Based on a review of the literature, several factors emerge relative to developing a framework for viewing accountability.

Level of accountability. Issues of accountability are relevant at the Federal, State, and local level. While this seems straightforward, the complex interrelationship among these levels of accountability may be difficult to untangle. For example, the manner in which a State chooses to hold locals accountable for Chapter II programs will most likely be dictated to a large degree by the program's Federal regulations. The intent of this paper is to focus on State-level accountability and the State's position relative to the Federal and local levels.

Who will be held accountable and for what. Since the focus of this paper, and the conceptual framework for accountability, is at the State level, to some degree this question is answered -- the State will hold the locals accountable for results. Nevertheless, there is considerable room for interpretation over who at the local level will be accountable for what results. Many parties share responsibility for achieving educational outcomes: students, paraprofessionals, teachers, building and district administrators, the school committee, and the school community. Accountability systems need to be sensitive to these multiple roles and responsibilities.

Difficulties in analyzing alternatives. In developing accountability systems, State-level policymakers need to grapple with several complex and difficult issues. Analyzing the efficiency of various approaches or conducting a "benefit-cost analysis" of different strategies is not as straight forward as it is in the private sector.

For example, Monk (1992) examined the nature of traditional "production function" research that sought to discover systems of accountability and cost-efficiency by examining the relationship of various "inputs" (e.g., expenditures, teacher-student ratios, etc.) to various educational outcomes, usually student achievement or labor market success. After reviewing the production-function literature, Monk concluded:

> Numerous states and some school districts have implemented reforms containing outcome-based incentives... In so doing, the more centralized authority sidesteps having to spell out the ingredients of education success and can sit back and act as judge and jury of those with the more immediate responsibility of producing the desired results. This policy response can be viewed as a strategy , perhaps even an ingenious strategy, that successfully finesses the ignorance that characterizes our knowledge of the underlying education production function(s). Ingenious though this "outcomes as standards" response may be, there are serious deficiencies that are not sufficiently well appreciated (pp. 307-308).

Relationships among stakeholders. Ferris (1992) argued that contractual obligations are implicit in many of these nested levels in our educational system and used the "principal-agent framework" to analyze educational accountability. This framework has traditionally focused on contractual arrangements in the private sector but Ferris found it useful for analyzing public sector endeavors such as education. In the context of this framework, the term "principal" does not necessarily refer to school-based administrators, but to a person or party contracting with an "agent" for delivery of services. In education, citizens enter into an implied "contract" with Federal and particularly State governments for the delivery of educational services. The States, in turn, enter into arrangements with local school districts and within the district the school board contracts with school district staff to implement educational policies. Further, the district may choose to delegate authority to the school level and hold the school accountable for results.

This school-based decisionmaking approach has been increasing in popularity, but it is not without potential problems. The "agent" carrying out the implied contract may have different interests and objectives than the party contracting for services and may pursue these objectives at the expense of the goals of the contracting party. Holding the agent accountable may be difficult due to the problems associated with accurately measuring the desired outcomes, and enforcing the "contract" may be costly. These problems apply to districts initiating site-based decisionmaking approaches but they are equally applicable to State-level accountability systems. Ferris (1992) has stated that the devolution of key decisions to the school site developed out of a desire to capitalize on the school's superior knowledge about the school's clientele and immediate educational environment. However, many recent State-level reforms (e.g., Statewide testing and curricular goals) have a centralizing tendency and may erode local-level autonomy.

Need for flexibility. Mohrman, Lawler, and Mohrman (1992) also discussed issues facing schools in considering such contractual arrangements and in instituting systems of participatory decisionmaking. These authors argued that the educational process is "complex, uncertain, and highly interdependent," and thus should involve high levels of teacher involvement in decisionmaking. This approach involves "moving the design process as close as possible to a particular customer base, thereby reducing the number of political agendas that have to be accommodated" (p. 359). The authors view this process as complex and "no one way fits all":

> In this process, the multiple stakeholders get together to design their organizational unit. They first clarify the values that they are trying to optimize, educate themselves about their choices and the trade-offs they must make, and determine how their future must differ from the status quo. Only then do they determine a design, implement it, and set up a process to learn how it works and to tinker or change it until they achieve their desired results. A self-design change process is a participative learning process for guiding fundamental organizational change (p. 358).

In other words, there is no clearly defined blueprint for the success. Accountability systems must be flexible and open to revision based on results and on feedback from educators involved in the process.

Special Education and Accountability

Attempts to assure accountability in special education are built into Federal and State statutes and regulations. The major approach to special education accountability has been monitoring for compliance with these statutes and regulations. Monitoring takes place on two levels: The Federal government monitors States and the States monitor local school districts. In both cases, the monitoring process that has evolved has become quite elaborate, intensive, and "highly visible" with considerable energy being expended in preparing for monitoring visits and responding to issues identified in the monitoring process. At the same time, monitoring has focused on regulatory and procedural compliance rather than on results (Rostetter, 1988).

The monitoring process has been focused upon ensuring that students with disabilities have access to education and that certain prescribed **procedures** are followed (Ahearn, 1992). The monitoring process does not, therefore, ensure the attainment of specific results. The presence of certain procedural requirements, such as the annual review of an IEP, do imply at least some level of accountability -- the school must convene a meeting to discuss the student's program and the possibility exists that the parent may hold the school accountable for changing a student's program if it is deemed inadequate. Similarly, implicit in requirements such as a parent's right to an independent evaluation is a system of "checks and balances" in which parents may hold the school to some level of accountability.

At the same time that monitoring has evolved into such a formal and complex process, other perhaps less comprehensive methods of assessing accountability in special education have been attempted. In fact, the IDEA requires State plans to include provisions for an annual evaluation of the effectiveness of programs in meeting the education needs of students with disabilities (Gonzalez, 1992). However, in spite of this requirement, the results of a recent study indicated that "the majority of States continue to use compliance monitoring procedures as a program evaluation tool to a significant degree, and findings from monitoring activities, presumably, as evidence of the effectiveness of special education programs and services" (Gonzalez, 1992, p. 10).

The research community has been actively involved in evaluating special education programs, and evaluation components are required in program model demonstration grants from the Office of Special Education Programs (DeStefano, 1992). On a national level, studies of youth in transition, such as the National Longitudinal Transition Study (NLTS), have examined the relationship of special education services and the postschool experiences of youth with disabilities. The results provide some measure of "what works" and therefore standards for accountability. In a somewhat related effort, Lewis et al. (1988) conducted a cost-benefit analysis

of special education and argued that this process provided some measure of accountability: "The principal benefit to special education is the focus on the usage of resources in relationship to outcomes. Such analyses force administrators and policy makers to address questions of resource usage in relation to expected postschool benefits for students with handicaps [*sic*]" (p. 212).

Finally, special educators have used the "changing of professional roles" cited by Kirst as measure of accountability. Personnel preparation has always been a crucial element of special education, and it has been argued that special educators already have many of the skills that are being sought for tomorrow's general education teachers (Cook & Friend, 1991; Sailor, 1991). In addition, models of personnel preparation are changing in response, in part, to school reform and more collaborative teaching models are being explored (Friend & Cook, 1992). By enhancing professional status, roles, and responsibilities, important element of accountability may be incorporated into special education programs and services.

Common Elements in State-Level Accountability Systems

As is evident from the discussion above, several types of accountability systems exist. This section presents a framework for analyzing the core elements in any accountability system.

Content. The question here is for **what** are designated parties to be held responsible? For lowering absentee or dropout rates? For raising student achievement on one or more achievement tests? What about objectives regarding affective or ethical development? What are the specific **indicators** that will demonstrate achievement of the chosen outcomes?

Discussions over the desired outcomes of education are relevant. The problems of clearly articulating the outcomes of education have long been noted (for example, see Hanson, 1987). The National Center for Educational Outcomes (NCEO) recently convened a series of meetings during which various stakeholders generated lists of desired educational outcomes. The result was a list of some 200 outcomes! (Ysseldyke, personal communication, June 1992). For obvious reasons, it is essential to be clear over the content of accountability, and careful consideration needs to be given to this determination.

Measurement. Once the questions of content for accountability is determined, **how** will we accurately measure the indicators of achievement of these chosen outcomes? In some cases, the answer appears obvious because what is being measured is in quantifiable form - for example, student achievement tests. Questions of the technical adequacy of assessments raises a host of complex questions, however, and these become even stickier when we strive to make comparisons and fair decisions over how to administer accountability systems. Should we hold everyone to certain standards or do we make adjustment for background factors (e.g., district socioeconomic status) in making comparisons and administering consequences? How do we know that we have accurately measured this factor? What about other factors that prevent a "level playing field"?

Measurement presents a different type of problem with less quantifiable educational results. Space here does not permit a review of the "quantitative v. qualitative debate" that has enlivened the pages of many educational journals for at least the last 15 years and arguably much longer[2]. It is clear, however, that certain results of education present particularly difficult measurement challenges. How does one measure "citizenship"? How does one measure the types of social and interpersonal skills that young people will need to compete in tomorrow's work force? The argument presented here is not that these are inherently non-quantifiable but that these types of skills may be important results of public education, and it may be quite difficult to measure these, to make fair comparisons, and to hold educators accountable for results. Again, States need to consider carefully the available options regarding measurement issues in developing their overall accountability system. As stated by Monk (1992), "incentives can be well or poorly designed. They can give rise to perverse and unexpected effects" (p. 316).

Reporting and use of data. Once decisions have been made regarding content and measurement issues, policymakers must decide how to use the results and the best methods and formats for reporting them. The two decisions are intertwined and choices over format are related to decisions over the target audience for the report. Lengthy reports are not likely to be successful in mobilizing the public's support; face-to-face contact with key political players may be unlikely. States have experimented with "report card" types of approaches to providing considerable information about a district's performance in a quickly digestible fashion. As noted above, however, such an approach may lead to a narrow focus of desirable outcomes or foster a negative school climate.

Consequences. Another important decision in designing an accountability system involves deciding on how to reward good performance and to punish or ameliorate poor performance. Rewards may be fiscal or they may involve good public relations (e.g., the publishing of Statewide test results in newspapers), or other benefits or privileges (e.g., the "waiver" of certain State requirements. Sanctions may take the form of increased State intervention, fiscal penalties, public exposure (again, the publishing of test results is an example), or other forms of negative public relations. It is worth noting that some forms of sanctions and rewards may have an effect on morale, school climate, and community-school relations.

All the elements cited above are intertwined, and decisions over one element affect decisions in the others. It is also worth noting that issues concerning staffing and financial resources cut across all of the above elements of accountability. For example, reporting results in a variety of formats is clearly desirable but not necessarily cost-effective.

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[2]Gage (1989) provides a review of these debates in his article, "The paradigm wars and their aftermath: A 'historical' sketch of research on teaching since 1989", in the *Educational Researcher, 18*(7), 4-10.

External, and to a large degree uncontrollable, factors such as the State's budget affect the design of an accountability system. The design may depend on how the State is being held accountable by the Federal government or the citizenry at large. As an example, pressure from the public to demonstrate increased student achievement may substantially affect the ways in which the State holds local districts accountable for results on Statewide assessments.

State-Level Accountability Systems: Alternative Approaches

One of the consistent themes in the literature on educational accountability is that there is no one "best way." Difficulties arise due to the multiple stakeholders involved in the educational process and the uncertainty over the specific organizational and instructional strategies that are sufficient conditions for achieving desired results. As stated by Mohrman, Lawler, and Mohrman (1992): "The political nature of schools makes the transition [to organizational change and enhanced educational performance] more difficult than in private-sector firms. Agreement on desired outcomes and on assessment of current performance is hard to come by, and lack of agreement is likely to paralyze needed reform" (p. 359).

Given the lack of one clear and best approach, each State's choice over methods of ensuring accountability needs to be sensitive to the complex and unique relationship in each State among the citizenry, the State Board of Education, the State Education Agency, the local districts, and the local schools. The accountability system must be designed to match the political and demographic conditions to which it will be applied. Decisions about desired results, degrees of local autonomy, and the nature of contractual arrangements (whether explicit or implied) for producing desired results must all be carefully tailored to the particular circumstances of the State. It is in this context that each SEA needs to consider the **content, measurement, reporting and use of data** as well as the **consequences** for performance that will form the basis for their accountability system.

Because this process of developing, assessing, and constantly revising accountability systems should be a dynamic and ongoing process, States may benefit from the experience of other States in developing and testing alternative models of accountability. Therefore, the sections that follow highlight the accountability systems that have been developed in three States. While these States have given careful and considerable thought to designing and implementing accountability systems, they are not intended as "exemplars" that all other States should follow. Rather, they are offered as examples of different approaches that States have taken in designing their accountability systems. The accountability systems of New Jersey, Virginia, Michigan and West Virginia are described below.

New Jersey

One of the outcomes of public education is the high school diploma, and New Jersey closely examined their diploma issuance system in 1987. As a result, New Jersey has a single diploma system that provides for granting a diploma on the basis of attendance, course credits, local requirements, and a measure of high school proficiency. The high school proficiency test measures achievement at the 9th grade level, but is now shifting to an 11th grade standard.

A proposal was made to establish a separate diploma for students with disabilities when the Statewide diploma was being considered in 1987. The Department of Education opposed this provision and developed a proposal that would establish the same requirements for all students. Students with disabilities would be treated exactly like all students unless, because of the nature of the disability, graduation requirements would need to be modified. The State now requires all students to pass the proficiency test in order to receive a State-endorsed diploma unless the student is exempted in the Individual Education Plan (IEP). Exemptions are granted to students whose educational plan does not include proficiencies that are tested, but an exempted student must demonstrate proficiency in a set of *alternative* areas outlined in the IEP.

As an example, a student with a moderate to severe cognitive disability might not be taught the math proficiencies addressed in the Statewide assessment. Therefore, the student could be exempted from those proficiencies and would have to achieve alternative proficiencies as proposed in the IEP, e.g., functional academics related to math, usually in the form of a portfolio demonstration of proficiency. On the other hand, a student with a learning disability who received instructional support in the resource room for the regular curriculum content *would* have to demonstrate proficiency on the Statewide exam. Test accommodations are available for students with disabilities such as taking the test in Braille, extra time allowances, etc.

Test scores are made public in New Jersey, and public pressure for accountability has grown for local districts to increase the number of students passing the proficiency exam. Many educators in New Jersey speculated that there would be pressure to identify more students as eligible for special education and therefore eligible to take the exam with modifications. Contrary to the dire predictions, more students took the Statewide test and the number of students passing the exam also increased. This may change, however, when the new 11th grade standard of proficiency for passing is adopted. The graduating class of 1995 will be the first class tested at the 11th grade proficiency level, and this may lead to an increase in the number of special education students being exempted from Statewide testing.

In another effort to examine and enhance the accountability of local districts, the State Department of Education gave grants to nine local districts to examine three issues: post-school employment for students with disabilities, special education dropouts, and special education students' achievement on standardized achievement tests. These grants were initiated eight years ago and ended after four years. The results and successful practices of these projects were published in a report on the transition of secondary special education students.

Since then, the New Jersey Department of Education has been developing plans to move toward a more outcome-oriented approach to special education. Currently, monitoring is predominately focused on compliance, but there is an attempt to incorporate outcomes in the process. The State is also looking to develop self-study guides and has attempted to emphasize a self-study, self-evaluation type of approach to outcomes rather than imposing mandates on local districts. This whole effort is in the planning stage and is intended to be flexible and adopt a collaborative approach with local districts to enhance accountability for positive outcomes.

Virginia

Special education accountability in Virginia is seen as a coordinated effort with general education. The demands for accountability by special education are somewhat different from those of general education because of Federal special education statutes and regulations. The State special education regulations require that local districts submit a plan that outlines all of their special education procedures. The LEAs are not asked to report on progress in Individual Education Plan (IEP) goal attainment, and there are no formal reporting or program evaluation requirements beyond that required by Federal mandates. Most of the data collected from the localities is for federal reporting purposes. Data from special education is included in the annual Superintendent's report, but this tends to be anecdotal rather than statistically oriented. The State does not attach specific sanctions (nor do they offer fiscal rewards) to districts beyond the threat of withholding allocations if the district is in regulatory noncompliance. This has not occurred frequently, but there has been at least one instance of the State withholding funds because of a lack of *general* education compliance. So far, Virginia has not withheld funds due to a lack of special education compliance.

The Virginia Department of Education has also recently modified its initiative on *Standards of Quality*, which is the guiding document for education in the State, and the special education division is seeking to coordinate its accountability efforts with this general education initiative and the overall goal of developing a "World Class System of Education" program by the year 2000. This plan for a world class system includes four components:

- All graduates will be prepared to directly enter and continue in the skilled work force, or to enter and complete further academic and technical education.
- Establishment of a Common Core of Learning that defines what all students should know and be able to do when they graduate.
- The World Class Education Program will measure student mastery, and hold schools accountable for the results.

- Ensuring that all students have an opportunity to master the Common Core of Learning means trying innovative approaches to instruction and ways of organizing schools.

As with other States, it is expected that Virginia's accountability measures will apply to students with disabilities, but the logistics of how they will apply is yet to be precisely determined. The Lead Specialist for Special Education serves as the liaison between the special and general education agencies, coordinating activities so that the LEAs will act in concert. The Virginia Department of Education is examining an outcomes-based approach to accountability and is gathering information on outcomes based education and on developing a common core curriculum.

Since 1991, performance indicators on special education have been reported annually through Virginia's Outcome Accountability Project. The indicators focus on student outcomes and are reported as percentages at the district level. The include: attendance; dropout rate; receiving the regular or advanced studies diploma; pass rate on the State's literacy test for 6th graders; participation in structured work programs; and, co-curricular participation with non-disabled peers. Current emphasis is placed on using the indicator information to improve local special education programs and to increase student achievement.

The Virginia Department of Education operates from the perspective of forming a partnership with LEAs for improvement of programs. There is flexibility in placing accountability demands on LEAs, and they acknowledge local conditions and respect local decision making unless there are clear indications that local decisions are not in the best interests of the students. The Department of Education prefers to offer leadership rather than issue mandates for the local districts.

Michigan

In Michigan, accountability is viewed in terms of forming a partnership with local districts rather than taking a prescriptive "top-down" approach. For example, an outcomes approach to special education is promoted but not mandated and, in fact, it is not known for sure how many districts are using the State guidance in outcomes.

Michigan has a long history of local autonomy and State policymakers have chosen to work with this trend rather than against it. Currently, monitoring is for compliance only and is not "outcome-oriented," although current plans include a gradual switch to a technical assistance orientation to monitoring and some possible approaches are being pilot tested.

The Michigan Education Reform Act (PA25) includes components designed to enhance local accountability. The Reform Act covers four areas:

- accreditation
- core curriculum
- annual reporting to citizens
- school improvement teams

SEA personnel report that the accreditation process, scheduled to begin in the fall of 1993, is the most significant accountability measure in PA25. The standards for accreditation are outcomes based and require schools to meet criteria within specific standards.

Special education is not specifically cited in PA25, but special educators did participate in the development of the standards and agreed that accountability for programs serving students with disabilities could be measured within the general standards. As stated by SEA personnel, "It is now incumbent upon us in the field of special education to assure that such accountability is realized (to assure that student outcome data is disaggregated to document the performance of students in special education programs, for example)."

The area of the model core curriculum provided for in PA25, however, is academically based and thus lacks accountability measures for some students with severe impairments. In addition, the third component of PA25, dealing with annual reporting, does not specifically mandate reports on the status of students with disabilities. Hence, this area of accountability is not mandated by the law and remains at the discretion of local districts. Similarly, there is no specific mandate for special educators to be on the school improvement teams required at both the building and district levels. The law does require that school improvement plans be established and the quality of these plans will be evaluated within the accreditation process.

With the Michigan Educational Assessment Program, students with disabilities have traditionally been tested only if they are mainstreamed for the subject being taught. However, this is currently being challenged. With the advent of PA25, students will be assessed on core curriculum outcomes and expected to achieve a given standard of proficiency. Thus, issues have arisen around the appropriateness of a core curriculum for all students and whether schools need to develop other measures of success for some learners with disabilities. At this point, while the intent of PA25 is for accountability mechanisms to apply to all students, the true impact of the standards on special education is yet to be determined.

In summary, Michigan special education is "on the same train" as regular eduction in the reform efforts of PA25. Due to the history of local autonomy, the State is extremely flexible in placing demands on local districts. Public pressure does play a role, however, as the publication of school-by-school results in local newspapers provides some measure of competition and accountability among school districts.

Conclusion and Recommendations

A clear lesson emerging from the literature on educational accountability is that designing and implementing an effective accountability system is no easy matter. Part of the difficulty involves the politics of education with multiple, sometimes conflicting, agendas and a lack of a clear consensus on desired outcomes. Further complications arise over the measurement of progress toward proximate and ultimate outcomes, conducting cost benefit analysis of alternative approaches, and providing an equitable system of rewards and sanctions based on performance. The complex interrelationship of Federal, State, and local responsibilities often prevents a clear locus of accountability for desired outcomes. Local adaptations to even the most carefully constructed accountability system may lead to unanticipated consequences.

In spite of these difficulties, it is clear that demands for accountability are not going to disappear. Special education is particularly vulnerable to criticism as State and local education agencies struggle with financial difficulties at the same time that costs rise for special education, particularly for "high visibility" instances of residential placement and related services. Special educators clearly need to consider demonstrating the results of programs and services for students demonstrating forms of accountability other than procedural compliance with statutes and regulations. Based on the analysis of issues of accountability presented in this report, a clear need exists for State level policymakers, researchers, practitioners, and other stakeholders to seriously address the issues surrounding the design and implementation of accountability systems. One of the difficulties cited in establishing effective accountability systems is the existence of multiple stakeholders, and a discussion of accountability systems needs to bring multiple constituencies "to the table" for the dialogue. An examination of the State accountability systems presented in this report also indicates that the discussion, as well as the subsequent design and implementation, of accountability systems must be a collaborative effort of general and special education.

This report began with a definition of accountability as being subject to giving an account, to being answerable. Multiple parties are answerable for the nature and health of our educational system: government leaders, policymakers, administrators, teachers, parents, and the public at large. The next step in the process of examining and analyzing special education accountability is for general and special educators to work together to develop a comprehensive system of accountability for the effectiveness of educational programs for all students.

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COUNCIL OF CHIEF STATE SCHOOL OFFICERS

STATE EDUCATION ACCOUNTABILITY REPORTS, INDICATOR REPORTS, AND REPORT CARDS

June 1994

Compiled by CCSSO State Education Assessment Center
in cooperation with state education agency representatives to
Education Information Advisory Committee

Rolf K. Blank
Director, Education Indicators Programs
State Education Assessment Center
1 Massachusetts Avenue, NW
Washington, DC 20001-1431
202/408-5505

This inventory of state education reports was compiled by the Council of Chief State School Officers through a survey with all 57 state education agencies (50 states, D.C. , and 5 extra-state jurisdictions) that are members of the Council. The survey respondents were state representatives to the Council's Education Information Advisory Committee (EIAC). States had several opportunities to review and edit the information on their reports. Reports listed in the inventory are published or released by state education departments. In a few states, data collection and analysis are completed by state education departments and reports are released by local school districts. State education representatives determined if a given report has a purpose of education accountability, education indicators, or a report card on education in the state.

State Education Accountability Reports, Indicator Reports, and Report Cards

	Current Reports	Annual report?	Is state report mandated?	Level of Statistics Reported	When is report released?	Contact	Contact's Title	Contact's Phone No.
ALABAMA	Annual Status Report	yes	no	school, district, state	Mid-February	Rex Jones	Manager, Computer Services	205-242-9590
ALASKA	School District Report to the Public	yes	yes	district	Jan. 15 - Feb. 15	Bob Silverman	Supervisor, Data Management	907-465-8680
AMERICAN SAMOA								
ARIZONA-1	Statewide Report for Arizona Pupil	yes	yes	state, district	June	Charles Wiley	Assessment Program	602-542-3759
	Achievement Testing							
ARIZONA-2	Arizona Student Assessment Program	yes	yes	state, district	March	Marilyn Henley	Assessment Program	602-542-5528
	March 1993 Assessment Results							
ARIZONA-3	Annual Report of Progress Towards	yes	no	state	September	Jeff Cohen	Special Assistant to Superintendent	602-542-5950
	the National Educational Goals							
ARKANSAS-1	Statistical Summary for the Public	yes	yes	district, co-op level, state	April	Barry Kincl	Coordinator, School Statistics	501-682-4258
	Schools of Arkansas 1990-92						& Fiscal Services	
ARKANSAS-2	Rankings of Arkansas School Districts							
	on Selected Items							
CALIFORNIA-1	School Accountability Report Cards,	yes	local	school	November	Bill Padia	Dir., Research, Evaluation &	916-657-2757
	1993-94		reports				Technology Division	
CALIFORNIA-2	High School Performance Report	yes	no	state, district, school	April	Bill Padia		
	Summary, 1992-93; Middle Grades							
	Performance Report Summaries							
CALIFORNIA-3	California Statewide Assessment Reports	yes	yes	school, district, state	December	Dale Carlson	Director, California State Assessment	916-657-3011
	Elementary Performance Assessment							
	Middle Grades Performance Assessment							
	High School Performance Assessment							
COLORADO	State Report Card 1993, Meeting the	yes	yes	state, district	February	Judy Burnes	Exec. Dir., Planning & Evaluation	303-866-6824
	Challenge, K-12 Public Education in							
	Colorado							
CONNECTICUT-1	Strategic School Profiles, October 1993	yes	yes	school, district, state	October	Robert Lucco	Coordinator, Data Collection Unit	203-566-5635
CONNECTICUT-2	A Profile of Our Schools, Condition of	biennial	no					
	Education in Connecticut							
DELAWARE	Performance Assessment Profiles for	yes	yes	state, district, school	October (state)	Thomas A. Soltys	Education Associate, Data	302-739-4583
	Delaware Schools, October 1993				Nov. (school)		Analysis and Reporting	
DISTRICT OF COLUMBIA	Your School Profile, School Yr. 1992-93	yes	no	school, district	August	Sheila Handy	Deputy Superintendent	202-724-2406
DODDS-1	Annual Test Report, DoDDS, School	yes	yes	DoDDS system, region	August	Mary Johnson	Research & Assessment Officer	703-696-4490
	Year 1992-93							x152
DODDS-2	Report Card from DoDDS Parents,	biennial	yes	DoDDS system, region	December	Mary Johnson		
	1993 Survey Results							
FLORIDA	Florida School Report	yes	yes	school, district, state	mid-January	Carole Cowart	Program Specialist	904-487-2280
GEORGIA-1	Georgia School System Profile, 1990-91	yes	yes	district	September	Les Butler	Asst. Supt., Technical Support	404-656-2435
	(June 1993)						Division	
GEORGIA-2	Georgia Student Assessment	yes	yes	district	September	Stan Bernknopf	Dir., Research, Evaluation &	404-656-2688
	Program-State Summary (a) Curriculum-						Assessment	
	Based (b) Norm-Referenced							

State Education Accountability Reports, Indicator Reports, and Report Cards

	Current Reports	Annual report?	Is state report mandated?	Level of Statistics Reported	When is report released?	Contact	Contact's Title	Contact's Phone No.
GUAM		no						
HAWAII-1	School Status and Improvement Report	yes	yes, state	school, district, state	January	Michael Heim	Evaluation Specialist	808-735-9088
			board					
HAWAII-2	The Superintendent's Fourth Annual	yes	yes, state	state summary	October	Michael Heim		
	Report on School Performance and		board					
	Improvement in Hawaii, October 1993							
IDAHO	1992-93 Idaho School Profiles	yes	no (data	district	January 1	Marian Hylen	Bureau Chief for Finance	208-334-3330
			required)					
ILLINOIS	1992-93 Report Card	yes	yes	school, district, state	October 31	Richard Yong	Senior Research Scientist	217-782-3950
INDIANA	(indicators accessible by computer)	yes				Michael Huffman	Director, Education Information	317-232-0808
IOWA	Annual Condition of Education Report,	yes	no	state	November 15	Leland Tack	Administrator, Div. of Financial	515-281-4835
	November 1993						& Information Services	
KANSAS-1	Annual Report State Board of Education's	yes	no	state	January	Ann Harrison	Director, Planning, Research &	913-296-3604
	QPA						Evaluation	
KANSAS-2	State Assessment Report	yes	yes	state	September	Ann Harrison		
KENTUCKY-1	School Accountability Index Report,	yes	no (data	school	February 1-15	Scott Trimble	Dir., Division of Assessment	502-564-4394
	February 1993		required)				Implementation	
KENTUCKY-2	Annual Performance Report 1992-93,	yes	yes	district	October 1	Vicki Basham	Assoc. Com., Office of School	502-564-2116
	October 1993						Improvement	
LOUISIANA-1	Louisiana Progress Profile, District	yes	yes	district	mid-February	Sam C. Pernici	Administrator, Bureau of School	504-342-3756
	Composite Report						Accountability	
LOUISIANA-2	School Report	yes	yes	school	mid-March	Sam C. Pernici		
LOUISIANA-3	Louisiana Progress Profile, State	yes	yes	state	May/June	Sam C. Pernici		
	Composite Report							
MAINE-1	Report Card for Maine Schools 1992-93	yes		district, school, state	March	Jim Watkins	Director, MIS Division	207-287-5841
	(each district)							
MAINE-2	Guide to the Maine Educational	yes		state	July 1	Horace Maxie	Director, MEAP	207-287-5800
	Assessment 1992-93							
MAINE-3	Performance Report for Maine	yes		state	September 11	Pat Curette	Public Information	207-287-5800
	Schools							
MARYLAND	Maryland School Performance Report,	yes	yes, state	state, district, school	November/Dec.	Mark Moody	Dir., Planning, Results &	410-333-2045
	1993, State and School Systems		board				Information Management	
MASSACHUSETTS	Massachusetts School District Profiles	yes	yes	district, school	June	Peter Abair	Director, Parent Information	617-727-1313
							Center, Exec. Office of Education	
MICHIGAN	Michigan School Report (SEA &	yes	no	district, school	May	James Phelps	Assoc. Supt., Information Systems	517-373-3909
	Governor's report)							
MINNESOTA		no						
MISSISSIPPI-1	Superintendent's Annual Report	yes	yes	district	mid-January	Clyde Hatton	Director of Statistics	601-359-3487
	(Financial, Teachers, Students)							

Council of Chief State School Officers, State Education Assessment Center, Washington, DC, June 1994.

State Education Accountability Reports, Indicator Reports, and Report Cards

	Current Reports	Annual report?	Is state report mandated?	Level of Statistics Reported	When is report released?	Contact	Contact's Title	Contact's Phone No.
MISSISSIPPI-2	Report Card of School Districts (Test Scores)	yes	yes	district	mid-January	Clyde Hatton		
MISSOURI-1	Profiles of Missouri Public Schools, Financial, Pupil and Staff Data	yes	yes, legislature	state, district	March/April	Woodrow Fitzmaurice	Director, School Data	314-751-2569
MISSOURI-2	Report of the Public Schools of Missouri							
MONTANA		no						
NEBRASKA	(school district reports)	yes	district reports	district	local policy	Jack Gilsdorf	Director of Assessment & Evaluation	402-471-2444
NEVADA	Nevada Education, A Status Report	yes	yes, legislature	school	March	Kevin Crowe	Director, Planning, Research & Evaluation	702-687-3130
NEW HAMPSHIRE		no						
NEW JERSEY	The School Report Card	yes	yes, legislature	school	September	Jerry DeMauro	Director, Bureau of Statewide Assessment	609-292-5180
NEW MEXICO	The New Mexico Accountability Report 1992-1993	yes	yes, legislature	district	mid-December	Jerry Cavatta	Director, School & Student Data Management	505-827-6526
NEW YORK	Statewide Profile of the Educational System (Vol. 1) and Statistical Profiles of Public School Districts (Vol. 2)	yes	yes, legislature	state, district	February	Martha Musser	Associate in Ed. Finance Research	518-473-8169
NO. MARIANA ISLANDS								
NORTH CAROLINA-1	State of the State	yes	yes	state	April/May	Bill Brown	Director of Testing Services	919-715-1207
NORTH CAROLINA-2	1993 Report Card, The State of School Systems in North Carolina	yes	yes	district	Jan./Feb.	Bill Brown		
NORTH CAROLINA-3	LEA Performanced-Based Accountability Program (PBAP)	yes	yes	district	March/April	Bill Brown		
NORTH CAROLINA-4	School Improvement Report	yes	yes	school	March	Bill Brown		
NORTH CAROLINA-5	Statistical Profile	yes	no	state, district	July	Engin Konanc	Chief Consultant, Statistical Research and Data Center	919-715-1617
NORTH DAKOTA	Finance Facts (by district); Education Directory (statistics by school) 1993-94	yes	no	state, district, school	October	Ron Torgeson	Dir., Information & Research	701-224-2289
OHIO	Education Management Information System (EMIS): District Profile	yes	yes	district	February	Margie Pickens	Asst. Dir., Information Management Services	614-752-8732
OKLAHOMA-1	Results 1993, Oklahoma Educational Indicators Program, February 1994	yes	yes	state, district, school	February 1	Frank Raia	Asst. Director, Accountability	405-521-2578
OKLAHOMA-2	Oklahoma Historical Report (1994)	periodic	yes	district	February	Frank Raia		
OREGON	Oregon Report Card, Fall 1993	yes	yes	state	September	Jim James	Specialist on Assessment & Evaluation	503-378-8004
PENNSYLVANIA-1	Meeting the Challenge, 1993	yes	no	state	September	Don Spangler	Exec. Asst. to the Secretary	717-783-9783
PENNSYLVANIA-2	School Profile, November 1993	yes	yes, state board	state, district, school	November	Jim Hertzog	Chief, Division of Evaluation and Reports	717-787-4234
PUERTO RICO	Statistical Annual Report	yes	no	state, region, district	February	Aida I. Rodriquez Roig	Assistant Secretary	809-754-1130

State Education Accountability Reports, Indicator Reports, and Report Cards

	Current Reports	Annual report?	Is state report mandated?	Level of Statistics Reported	When is report released?	Contact	Contact's Title	Contact's Phone No.
RHODE ISLAND-1	Education Indicators Report on the Condition of Education, 1991	yes	no	state, district	February	Karen Cooper	Specialist, MIS	401-277-2841
RHODE ISLAND-2	Student Performance in Rhode Island: Reaching for High Standards	yes	no	state, district, school	December	Jim Karon	Coordinator of State Assessment	401-277-3126
SOUTH CAROLINA-1	South Carolina Education Profiles 1993	yes	no	district	September	Valerie Truesdale	Senior Exec. Asst., Division of Policy	803-734-8266
SOUTH CAROLINA-2	District Improvement Reports	yes	no	district, school	Spring	Valerie Truesdale		
SOUTH CAROLINA-3	What is the Penny Buying for SC?	yes	yes	state	February	Valerie Truesdale		
SOUTH DAKOTA	Executive Summary of School Profiles, 1993 South Dakota School Report Card Program	yes	yes	school	November 1	Susan Ryan	Director of School Finance	605-773-4748
TENNESSEE-1	21st Century Schools Report Card	yes	yes	state, district, school	October 1	Kip Reel	Deputy Commissioner	615-741-5158
TENNESSEE-2	Student, Teacher and School Performance 1994							
TEXAS	Snapshot '93: 1992-93 School District Profiles	yes	yes	state, district, school	Fall	Cherry Kugle	Project Director, Policy, Planning & Evaluation	512-463-9701
UTAH	Superintendent's Annual Report, (December 1993)	yes	yes	state, district	by December 31	Hal Robins	Coord., Finance & Statistics Section	801-538-7669
VERMONT	Summary of the FY93 Statistical Report of Schools	yes	no	district	January 1	Gerald Cassell	Supervisor, Computer Systems & Information	802-828-3151
VIRGIN ISLANDS	Statistical Summary Report		no		end of the year	Pat Nathan		
VIRGINIA	1993 Virginia Summary Report, Outcome Accountability Project	yes	yes	state, district, school	April/May	Cameron M. Harris	Division Chief, Information Systems	804-225-2099
WASHINGTON	Education in Washington, 1989-90	periodic				Al Rasp	Director of Assessment and Integrated Curriculum	206-753-3449
WEST VIRGINIA	West Virginia Report Cards, State, County and School Data 1992-93, December 1993	yes	yes	state, district, school	mid-December	Doris White	Technology and Information Systems	304-558-8869
WISCONSIN	School Performance Report, January 1993	yes	yes	school level	January	Tom Beebe	Division for Management and Budget	608-267-9619
WYOMING	Wyoming's Education Progress Report (October 1991)	periodic	no				Governor's Office	
TOTAL (N=57 state education agencies)	51	48	36	39 by District 28 by School				

Council of Chief State School Officers, State Education Assessment Center, Washington, DC, June 1994.

LEGISLATIVE UPDATE
to the
Chapter 1 Reform Network
from
The Independent Commission on Chapter 1

Under the new law, funds will be allocated to schools on the basis of poverty. Schools which are successful in getting their students to higher levels of proficiency will not lose their funding. They can be rewarded!

KEY CHANGES IN ACCOUNTABILITY

The legislation improves accountability for *results* by requiring states to set high standards and to hold school districts and schools accountable for getting *Title I students* to meet state standards. The Act is also requires each state to describe how it will help Title I schools and school districts *develop the capacity* to provide students with a high quality education as described in the statute.

A New Accountability Structure:

* States must define "adequate yearly progress" in a manner that results in "continuous and substantial" yearly improvement of each local educational agency and school [that is] sufficient to achieve the goal of all children meeting higher levels of the State's performance standards.... particularly economically disadvantaged and limited English proficient children." Progress must be based primarily on student performance on state assessments, but other measures may also be used.

* The state's plan must describe 3 levels of performance based on the assessments: "partially proficient, and proficient and advanced."

* States, school districts, and schools must report to the public on the progress students make toward meeting state performance standards. Achievement data must be disaggregated by gender, by major racial and ethnic groups, by income, and by English proficiency status.

* School districts and schools have two years to move students toward meeting state proficiency standards. After providing technical assistance, states must take corrective action against school districts in which students do not make adequate yearly progress toward meeting state performance standards. School districts must take similar corrective actions against schools. School districts and schools that succeed in assisting all students to meet state performance standards can be rewarded.

Don't Test, Don't Tell

Is 'academic red-shirting' skewing the way we rank our schools?

BY BILL ZLATOS

Begin with a tale of two schools—one educating children competently but winning little applause, another manipulating its testing program and garnering recognition and praise. One plays by the rules; the other plays the angles, perhaps even engaging deliberately in a dubious practice some might describe as "academic red-shirting," a variation on the old sports gambit of holding players back until they strengthen and mature. The result: yet one more crack in the fundamental validity of the test scores so many Americans rely on to measure the quality of education in this country. Take a closer look:

Nestled in the Hudson River Valley near Albany, N.Y., is Castleton Elementary School, a brick castle of a school in a town of the same name. Castleton's students do well on standardized tests, but not well enough for state or federal officials to create a stir by presenting the school with any blue ribbons or plaques. Instead, Castleton's hallways sport the students' renditions of Van Gogh's "Starry Night" alongside murals from "The Wizard of Oz" and "The Little Mermaid."

Every year, teachers at Castleton flunk one or two of the 370 students at the school, and they do so with a sense of their own failing. (Last year, they were fortunate: They didn't flunk anyone.) Only a handful of children—five last year—are identified as disabled, and those children are taught in the regular classroom with the help of a special education teacher who

Bill Zlatos is a free-lance writer based in Pittsburgh.

visits every room. The disabled students take the state-required tests, and some of the youngsters pass the exams. "We actually get people out of special education," boasts Principal Darlene Adams.

Not far away is Riverton, an old mill town filled with trailer parks, ranch houses, and Victorian mansions. Riverton is the pseudonym State University of New York researchers Richard Allington and Anne McGill-Franzen gave to this New York community in their 1992 study. Riverton Elementary School has received favorable newspaper coverage and a national award for educational excellence, based in part on its high scores on the state's third-grade test.

Ninety-six percent of Riverton's students pass the state achievement test. But that percentage was inflated, the researchers discovered: Half of the 68 students in kindergarten through the second grade had been flunked or had been placed in classes for handicapped students. Their scores weren't included in the district's average. If they had been, the researchers noted, the pass rate at Riverton would have dropped from 96 percent to 78 percent.

Communities like these exist throughout the United States: Castletons that educate children without fanfare, and Rivertons whose test scores and reputations get a boost from the decision to delay testing for low achievers—or do without it altogether. This practice is called exclusion, and it is the carnival mirror of education. It fattens the scores of some districts while making the figures of others look skimpy by comparison.

Last year, the MacArthur Foundation gave the Education Writers Association a grant to fund six national fellowships in education reporting. I received one of those fellowships to study how schools, knowingly or not, inflate their test scores by excluding low-achieving students. Part of my reporting involved number-crunching: I obtained data on the testing practices of 14 of the largest school districts in the United States (see sidebar on page 26). Part involved visiting school districts and talking with administrators, students, and testing experts across the country.

What I found was that something as simple—and supposedly innocuous—as exclusion makes comparisons among schools, districts, and states virtually impossible. Mix up the variation from state to state and district to district in the type of tests and norms used, the grade levels tested, the amount of time spent on test preparation, or the time of year the test is taken. Toss in the difference in the number of students excluded, and test scores become a witch's brew of incongruous ingredients. Accountability vanishes.

Yet the amount of state funding a school district receives can depend on test scores. A bond election can pass or fail on test scores, which the public often takes as a gauge of how well a school district is doing. Even a state takeover can depend in large part on whether a district's test scores rise or fall.

Lauren Resnick, codirector of the Learning Research and Development Center at the University of Pittsburgh, puts it succinctly. "The minute you allow exclusion," she says, "you open up a Pandora's box of manipulation designed to make the school or district look as good as possible."

Hitting pay dirt?

Talk to school executives, parents, teachers, or even state education officials, and you'll find two things: Schools can exclude students in many ways, and the practice is a popular way to inflate test scores. Schools can exclude students informally by suspending them or sending them to the gym or on field trips on test day. Or they can exclude students institutionally by flunking them, placing them in transitional grades—an academic limbo tantamount to flunking—or assigning them to classes for bilingual or disabled students. (Some parents of disabled children report forged signatures on individualized education plans that say their children should be excluded from testing.) These children often are exempted from tests. If they are tested, their scores might be left out of the district's totals, which receive more scrutiny than classroom or grade scores.

Like any good poison, exclusion is difficult to trace. The unsuspecting public and news media rarely ask questions about who is tested, and newspaper editors are unlikely to confuse the rankings of local schools with more numbers. Exclusion also provides a host of reasonable alibis: The school does not want to embarrass specific groups of children or make them anxious. The test was not normed for children like them. And besides, educators and policymakers haven't reached consensus on whether exclusion is appropriate—even ethical—in the first place. State regulations and local policies usually allow it.

Schools, meanwhile, can enjoy a big payoff by failing to test everyone. The more low-achievers the school system excludes, the higher its test scores are likely to be. Whether a school benches a low-achieving student to inflate its scores or to spare the youngster anxiety, the result is the same: Test scores will rise.

"You don't have to be much of a statistician to know if you can knock out [the bottom] 10 to 20 percent of your class, your scores are going to go up," says Thomas Haladyna, an Arizona State University researcher who specializes in the ethics of testing practices. Robert Slavin, of Johns Hopkins University, estimates that flunking low-achieving students or placing them in transition grades inflates scores by about 20 percentile points. After another year of covering the same material, he says, these students probably will answer a few more questions right the second time they take the test—yet their scores are compared to a national sample of younger students.

Last year, the state of Michigan inadvertently demonstrated what happens when you suddenly change the rules about exclusion. For years, the state department of education told school districts that if they did test students with disabilities or limited English proficiency, they could report the results separately. Last year, though, the state education department broke from tradition and decided to include the scores of bilingual and disabled students in its draft version of the state report card on the performance of school districts. And once the results of all students were combined, scores dropped. Districts bombarded the department with angry letters and phone calls, and the state backed off. The data tapes were erased. As in previous years, Michigan issued a report card that excluded the scores of handicapped and bilingual students.

Or consider the variations found in the number of students tested in two large city school systems. Both Massachusetts and Tennessee have regulations that allow the exclusion of some students. Massachusetts, like many states, says a child won't be tested if the child's IEP says so or if the parents request that the child be excluded; Tennessee's regulations say students will be tested unless the

IEP exclude them. In Tennessee, limited-English-speaking students may also be excluded. Yet, according to data provided by the Boston and Memphis school districts, only 66 percent of the students in Boston took the district's reading achievement test in the 1992-93 school year, compared to 93 percent of the students in Memphis.*

Why such a wide difference? For one thing, Massachusetts uses a broad definition to identify students needing special education, thus increasing the pool of students who could be exempted from testing. Boston appears to b exercising that option. According to data supplied by th school district, 21 percent of Boston's students are identifie as disabled—one of the largest proportions in the country—and 60 percent of the disabled students in Boston are eithe not tested or their scores are left out of the district totals. A a result, one out of every three students in the Boston publ schools isn't represented in the school system's test score

Boston defends its practice, saying the test pool is repre sentative of the city's student population. "It's based on the propo tion of students it's appropriate t have it based on," says Maryelle Donahue, director of planning, r search, and development for th district. Others insist the ga could have significant overall in pact on scores. "Anyone i Boston who believes that tes scores reported in daily paper accurately reflect student achieve ment in Boston is probably being given a rosier picture than what's true," says Anne Wheelock, a for mer senior policy analyst for the Massachusetts Advocacy Center, a public interest group for children.

In either case, one thing is clear: Given the differences in who takes the tests and how the results are reported, you simply can't compare test scores in Boston with those in Memphis.

Who's left out

Pine Lake Manor in Michigan is a microcosm of America's test-score mania. Residents of the 129 homes in this upscale subdivision are part of the predominantly black and overwhelmingly poor Pontiac School District. Last year, they tried unsuccessfully to secede from Pontiac and join predominantly white and wealthy Bloomfield Hills. And much of the debate on the secession centered on whether test scores are a valid indicator of school performance. Pine Lake residents argued before an administrative law judge that Bloomfield Hills offered a superior education. The proof: high test scores. One community member even testified that, under a divorce decree, his wife's children live with her ex-husband

How 14 districts test their students

Walk into the carnival fun house and look in the mirror: There's more distortion than you might expect when it comes to school district test scores.

Take the issue of "eligibility," for example. Most districts report test participation in terms of the number of "eligible" students. But eligibility rules vary throughout the country. And few school districts make clear to the public whom they're testing and whom they're leaving out. The Los Angeles Unified School District is one of the exceptions: It clearly describes who is tested and who is exempted on the first page of its testing report. More frequently, districts bury the information—if they provide it at all. As a result, a nation ever fond of rankings is increasingly comparing districts and states that don't play by the same rules. And communities assume their schoolchildren are succeeding when perhaps they aren't.

The following data, based on testing reports and documents provided by 14 of the nation's school systems for the 1992-93 school year, show the kind of variations that exist as well as the percentage of students who are represented in a school district's testing program—and not simply those who are eligible. Two caveats are in order to avoid misunderstandings. First, for those school districts marked with an asterisk, I have provided estimates of the total number of students enrolled in the grades tested; such estimates are necessary because some school districts don't report their special education enrollments by specific grades but by ranges of grades (the number of special education students in grades one through five, for example). Second, districts test different grades, and those that test greater numbers of high school students tend to have a lower percentage of students included in their scores because of high rates of absenteeism at the high school level. Four of the school districts in the list below—Baltimore, Philadelphia, Indianapolis, and Miami—did not include high school students in the testing programs cited here.

Finally, the numbers of students tested are based on information the school districts provided for the test they deemed most important for accountability.

District	Number of students tested	Number of students enrolled in grades tested	Percentage of students tested
Memphis*	71,553	76,841	93%
Fairfax Co., Va.*	36,456	40,175	91%
Baltimore	51,620	57,517	90%
Philadelphia*	112,043	129,470	87%
Indianapolis	13,355	15,732	85%
Miami	141,164	166,134	85%
Detroit	139,941	169,439	83%
Pittsburgh	30,182	36,960	82%
Chicago*	196,491	246,077	80%
Los Angeles*	423,674	552,239	77%
New York City*	535,923	703,505	76%
Washington, D.C.*	22,768	32,398	70%
Oklahoma City	8,599	12,534	69%
Boston	32,866	49,948	66%

* For the purposes of this project, I examined the total number of students in the grades tested, based on enrollment figures for the first reporting period, and not the total number of "eligible" students school districts typically count.

during the week because the ex-husband lives in a better school district.

Given these stakes, it's not surprising some schools succumb to the temptation to make their scores look artificially good. Of course, districts rarely broadcast the fact that they exclude students from testing. And they even more rarely confess they've done so to raise test scores. Still, plenty of evidence suggests children are being benched from tests throughout the United States.

According to the National Center on Educational Outcomes at the University of Minnesota, nearly half of all disabled students in the United States are excluded from the National Assessment of Educational Progress (NAEP), the U.S. yardstick for evaluating education. In addition, a 1993 study commissioned for NAEP shows wide disparities in the number of disabled students tested from state to state. According to the report, Washington, D.C., was least likely to test disabled students, and California was least likely to test those with limited English skills.

The report further estimated how state rankings might change if all disabled and bilingual students had been tested and had scored lower than other students. Among the findings: North Carolina would have jumped nine places on eighth-grade math, and Texas would have dropped six places on its fourth-grade scores.

Often, too, the number of disabled students tested will vary between school districts in the same state. Last year, for example, a survey released by the Massachusetts Department of Education showed that some school districts tested none of their disabled students and others tested all of them. Among the reasons given for the exclusion: the students' emotional or attention limits, their limited cognitive abilities, and their parents' requests. The researchers offered another reason as well: "The desire to look good is, perhaps, the underlying single biggest reason why it is easier to exclude students with special needs from group testing than to include them," they said.

Statistics from the National Center on Education Outcomes paint a similar picture nationwide. When the center looked at the number of students taking state tests, it found that test participation by handicapped students ranged from 2 percent in Michigan to 100 percent in Delaware. James Ysseldyke, director of the center, says school administrators tell him they are pressured by their state and the community to look good, so they test as few handicapped students as possible.

Bilingual students fare the same. According to a 1992 study by researchers Tony C. M. Lam of the University of Toronto and Wayne I. Gordon of the University of New Mexico, most states have no policies on exempting bilingual students from testing. Of the 17 states that do, the policies range from permitting no exemptions to excluding students for up to three years, leading the authors to conclude that decisions on whether bilingual students get tested are "often rather arbitrary."

Whether the students are identified as being limited in English proficiency or in need of special education, excluding them from testing helps make a district look good.

Take the case of the Oklahoma City Public Schools. During the late '80s and early '90s, Oklahoma City exempted thousands of handicapped and limited English students from state and local tests and placed thousands of others in transition classes.

The result of this exclusion was twofold: First, test scores mushroomed, rising from 39 percent of the students scoring above the national norm in 1987-88 to 53 percent in 1991-92. Second, the number of students who were tested dwindled from 34,000 in 12 grades to 19,000 in 10 grades. The school district's 4,000-student drop in enrollment during the same period doesn't explain the decline.

The Oklahoma City Schools gained a lot of mileage from the improved scores. The number of schools on the state's probationary list for low test scores dropped from 21 to one. A federal court dismissed a desegregation lawsuit in part because of the rising scores of black students. And the district received a Leadership in Learning Award from the American Association of School Administrators for the district's effective schools. The proof of the school system's success? Rising test scores.

Oklahoma City's practices were by no means unique. Three years ago, Forest Reece, then a member of the state Board of Education in Oklahoma, surveyed 20 schools that had worked their way off the state's probationary list and found that two of every three students in these schools had been exempted from state tests because of a disability or a problem speaking English.

Oklahoma City Superintendent Betty Mason, who assumed the post in 1992, sums up the state's high-stakes atmosphere that pits superintendent against superintendent the way athletic rankings pit coach against coach. Grabbing a newspaper from her desk and holding it up in the air, she describes the rivalry the day that tests scores are released. "When you open that paper in the morning and when you see how Tulsa compares to Oklahoma City, you want to be on top of that list," she says.

Under Mason, the Oklahoma City school board has relaxed its policy on retaining students in grade and eliminated seven transition grades. One transition grade and widespread exemptions remain. And the rise in test scores apparently has slowed: Last year, only one grade out of five showed an increase in its test scores.

Why test them all?

Make no mistake about it. Most educators are not exempting students simply to boost test scores. Arguments about the appropriateness of standardized tests for some students bear weight. A 1987 study conducted by experts in the field of special education and cited in the magazine *Exceptional Children* found that the developers of many of the 27 most popular standardized tests failed to provide evidence that their tests were valid for disabled students.

But as Resnick of Pittsburgh and Allington of the State

University of New York point out, there's an inherent danger in excluding kids: If children aren't tested, they become invisible. Like other critics of exclusion, both consider the testing of all students a key component of improving education for these students, and both favor testing accommodations, such as extra time, large-print or Braille versions, translators, and tests in the students' native languages when appropriate. Resnick's work as codirector of the New Standards Project in fact involves developing a series of tests, based on world-class standards, for students in math, English, science, and other subjects. Undergirding the project is the philosophy that all students will be tested.

Others worry that allowing schools to exclude some students is inherently discriminatory as well. "It tends to have a heavy racial and poverty piece attached to it," says Joan First, executive codirector of the Boston-based National Coalition of Advocates for Students. "The kids most likely to be excluded [for disciplinary reasons] are kids who are poor or members of racial or language minorities."

Most important, contends Paul LeMahieu, director of the Delaware Education Research and Development Center, exclusion institutionalizes bad education practice. Students who are flunked or placed in transition grades often endure another year of the same material taught by the same teacher using the same unsuccessful methods. Depending on the quality of their special education or bilingual classes, these students might stay behind for years. "I don't think it's premeditated murder," LeMahieu says. "It may well be murder, though."

Alicia Sosa, director of the Center for Test Equity at the Intercultural Development Research Association, agrees. She doesn't want bilingual students to drown in an ocean of tests, but she also doesn't want them shunted into the wading pool for the remainder of their academic careers. She and other advocates for bilingual education worry that failing to test students with a limited command of English deprives policymakers of information on youngsters who are most likely to drop out.

Resources are an issue as well. "All things being equal, the system is likely to send more quality teachers to the kids who get tested," says Kenji Hakuta, an education professor at Stanford University and chairman of a panel urging the overhaul of bilingual education.

To guard against that possibility, some school districts and states have made it difficult to omit students from testing. Sixteen states and six districts take part in the New Standards Project. Codirector Resnick says the project will evaluate students on real-life tasks, taking minutes or months, performed alone or in groups. The project will test students in Spanish and probably other languages, and students with learning disabilities and mental and emotional handicaps will be tested, too. "If you're not forced to include them in the testing, then you're not forced to include them in the instruction," says Resnick.

New York City and Miami also have policies that encourage widespread testing. New York includes in its totals the scores of all handicapped students in resource rooms, regardless of how much time they spend there; the city also offers a math test in four languages—English, Spanish, Chinese, and Haitian-Creole. Miami audits its more than 300 schools to ensure that every student is accounted for on the tests—and that no student is tested or exempted who's not supposed to be. Such oversight makes it difficult for individual schools to push the envelope on whom they're not testing; the central office and the school board are always watching.

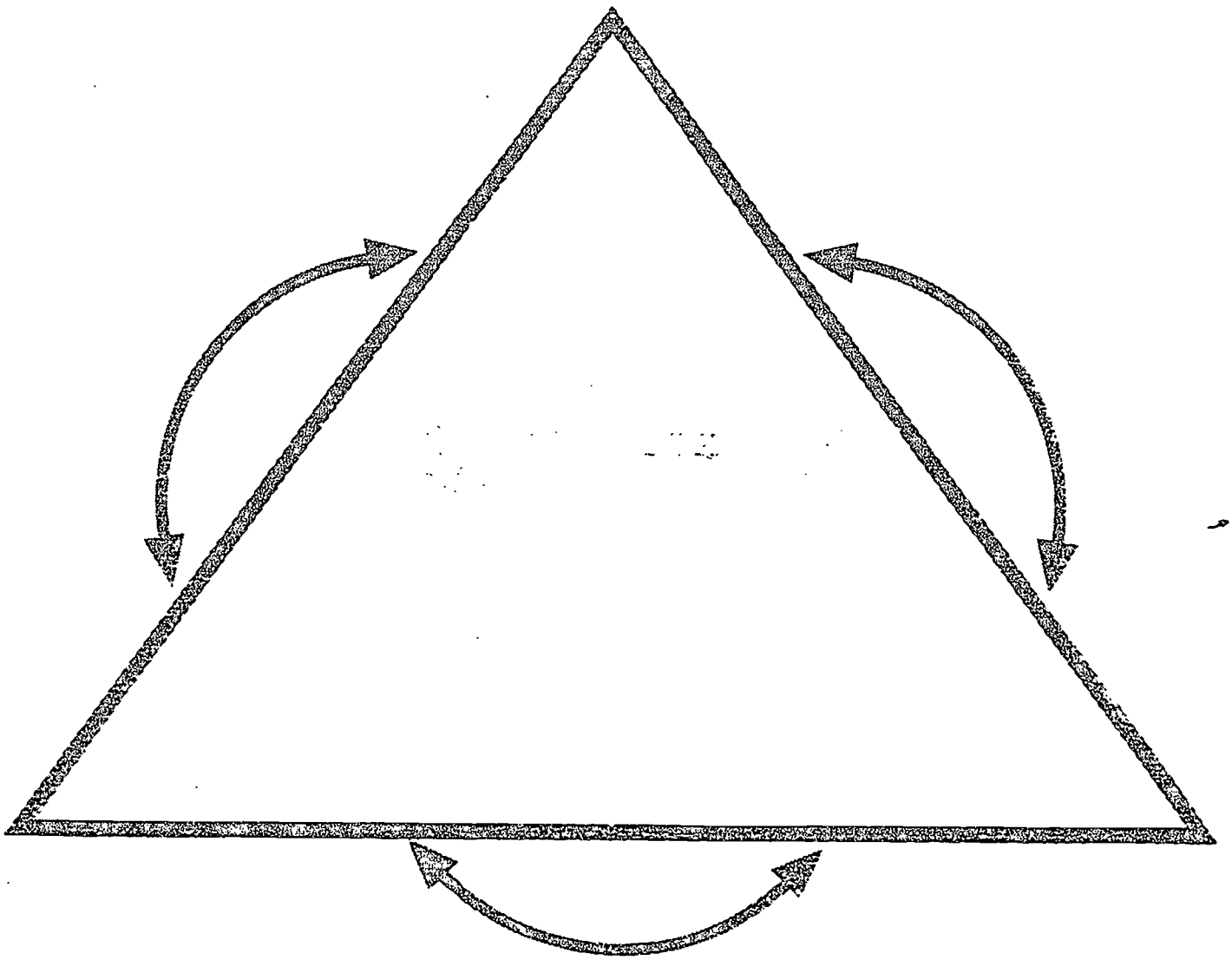
As part of its education reforms, Kentucky has adopted the toughest testing standards in the nation. Everyone seeking a high school diploma must be tested, though students with problems speaking English may receive a qualified, one-year exemption, and moderately or severely handicapped students may take an alternative test. Furthermore, students who are not tested automatically receive a "novice" rating, the lowest level of proficiency, says Scott Trimble, state director of assessment implementation, and that rating figures in the school system's score. In Kentucky, too, test scores are used for such high-stakes decisions as state takeovers.

Moreover, states like Michigan and New York report the scores of regular students and handicapped or bilingual students separately. Ysseldyke of Minnesota says that's the least states should do. That way, he says, schools and states have some information on how those children are doing.

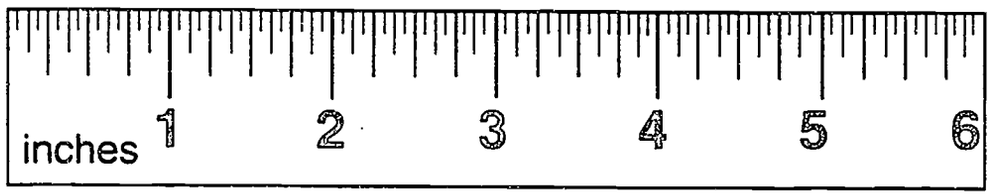
Allington, of the State University of New York, disagrees. "It continues to perpetuate the second-class citizen status of handicapped students," he says, adding that people pay more attention to the other scores.

The most sweeping suggestion for cleaning up testing abuses comes from Boston College testing expert George Madaus, who recommends creating a national board to monitor testing practices. That board, Madaus says, could not only monitor any national exams that might be developed but could also monitor the disclosure of who is tested. Bruce D. Spencer, of the Methodology Research Center at Northwestern University, wants districts to report the percentage of all students the district tests. "It's all couched in bureaucratic criteria as to who's eligible and who's not," he complains. "It's hard to know as a citizen or as a social scientist exactly who is being excluded."

For children who are excluded, being left out of tests starts a cycle of bad education that ultimately ends in failure. "The school doesn't feel responsible for getting those excluded kids to high levels of achievement," says Kati Haycock, director of the Washington, D.C.-based Education Trust. "In the end, we tell the world they're not achieving because they're dumb, their parents don't care, [or] they don't have books at home. We tell the world all these reasons, when in truth the reason they don't do well is because we don't educate them."



MEASURE WHAT YOU TREASURE.



TREASURE WHAT YOU MEASURE.

Martha Fields, 1995

ACCOUNTABILITY

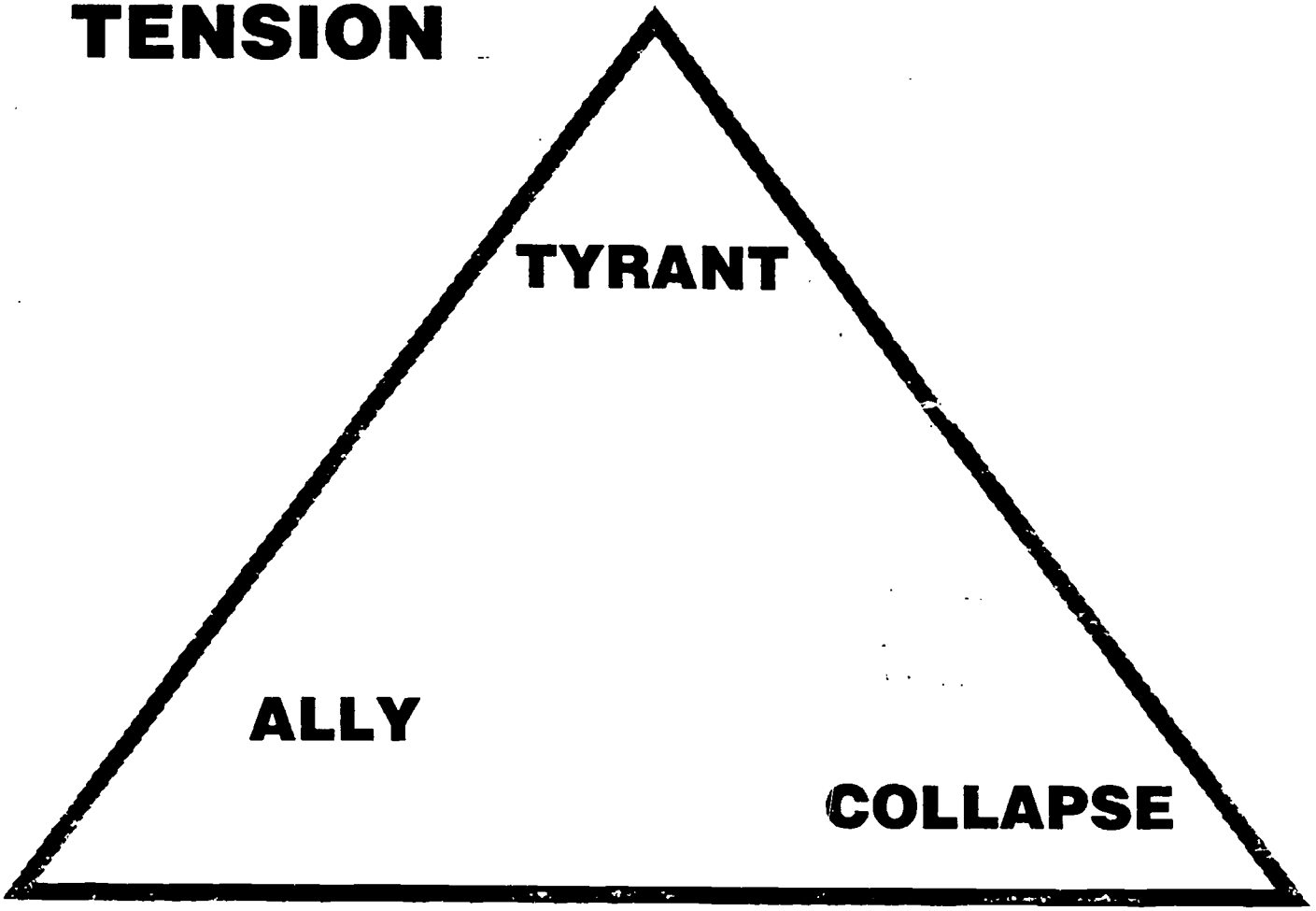
The process by which we take account of what we intend; a measuring and diagnosing; being answerable to something; a way of ensuring children are making progress toward appropriate outcomes, both cognitive and non-cognitive.

An accountable education system is one which ensures that all children, including those with disabilities, benefit from their educational experience through equal access, high standards, and high expectations. Through these experiences, all children will become "caring, productive, socially involved citizens who are committed to lifelong learning."

Quotation from the mission statement of the *National Agenda for Achieving Better Results for Children and Youth with Disabilities*. June, 1994.

APPENDIX C: Model Diagrams

HOLDING CREATIVE TENSION



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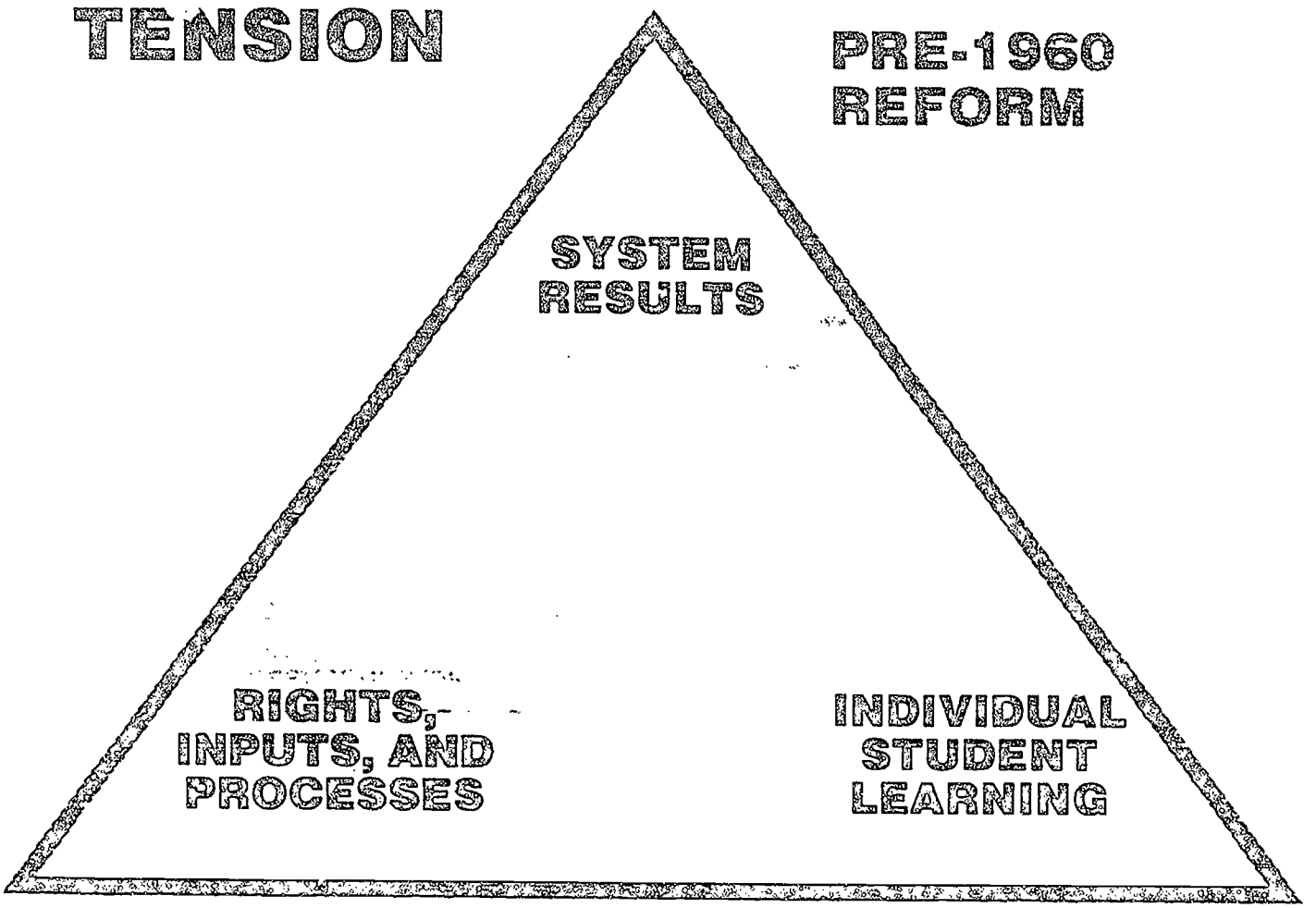

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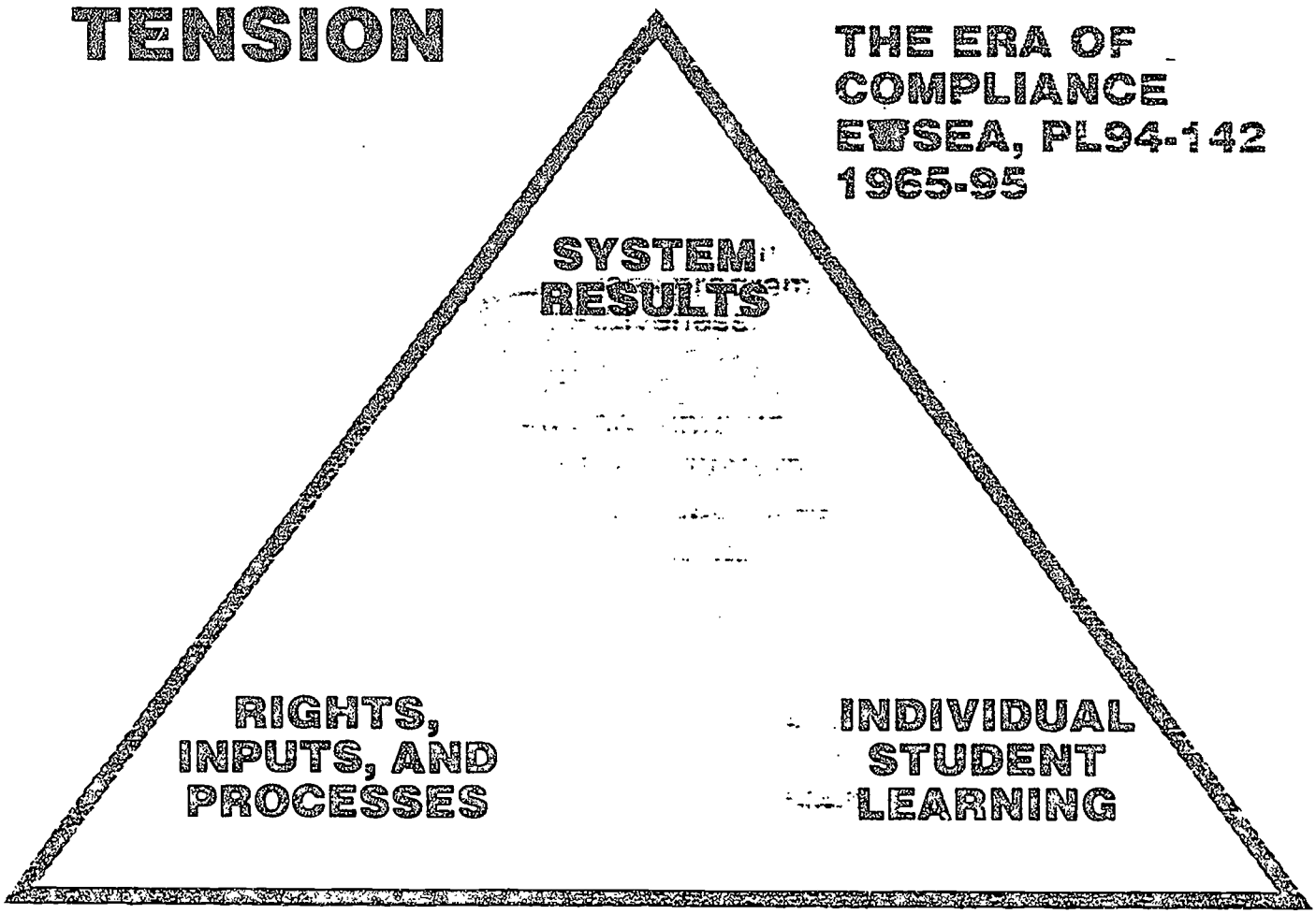

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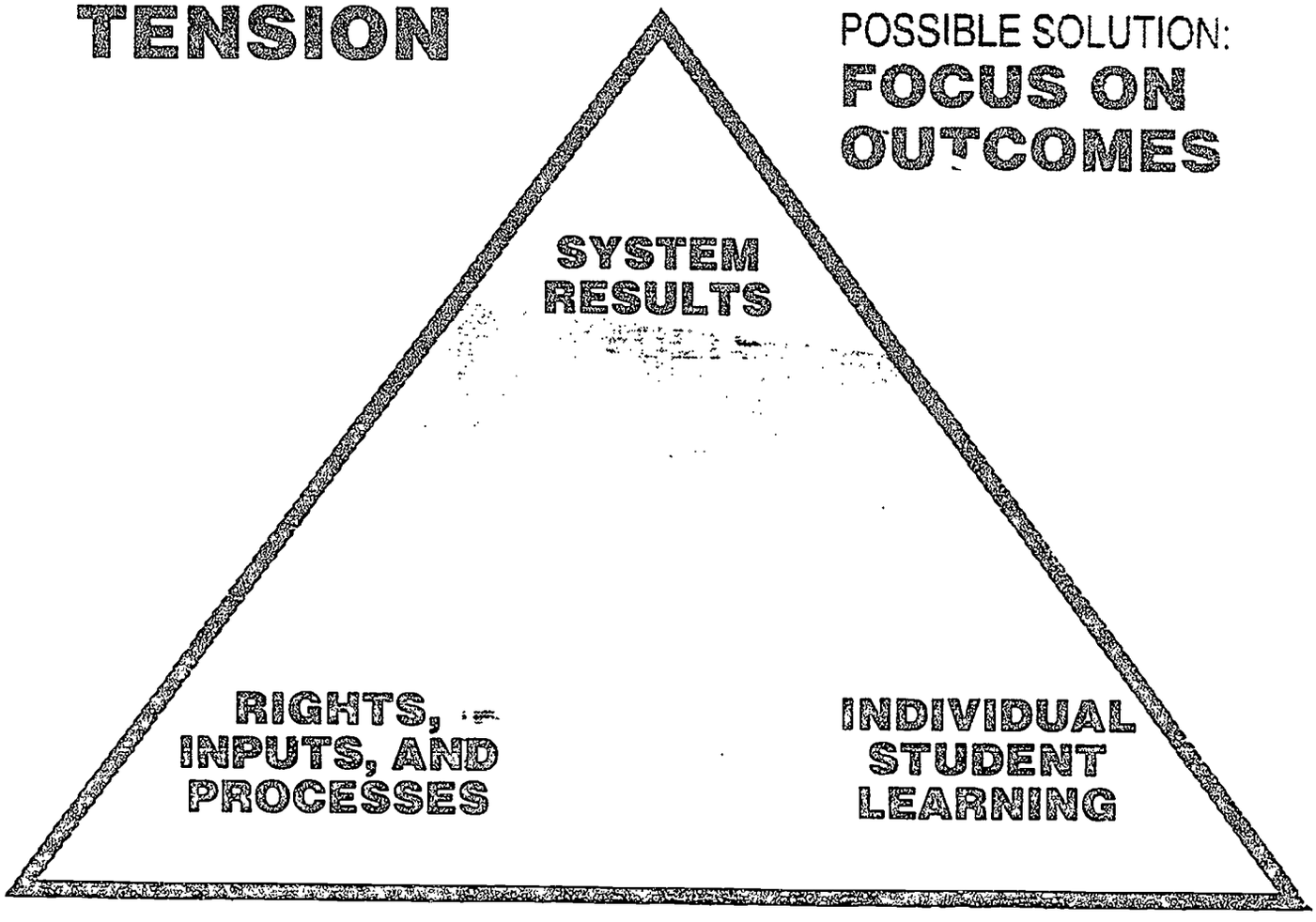
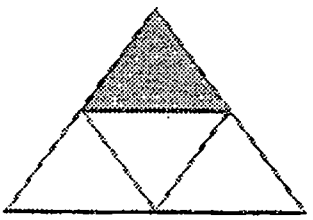
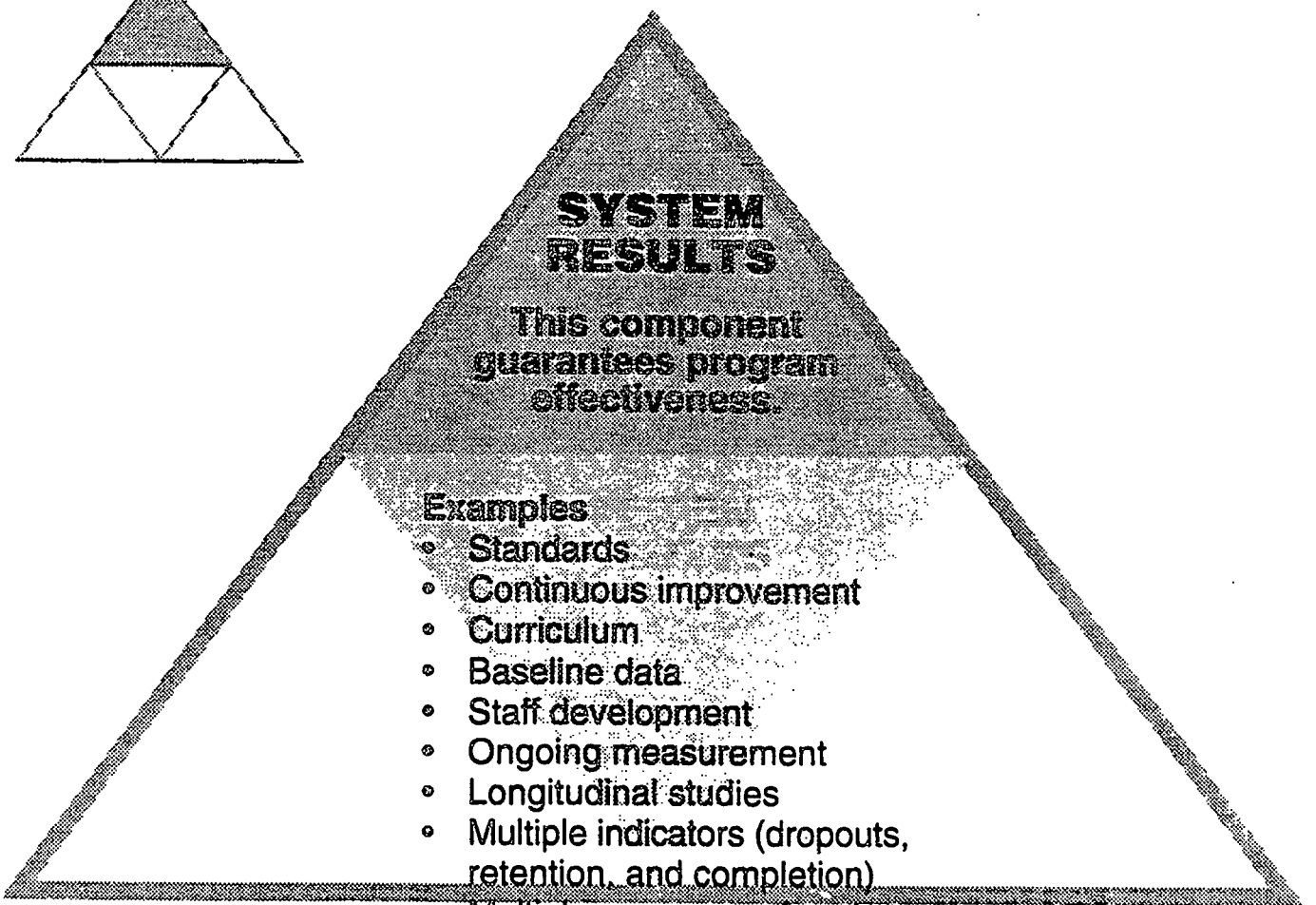
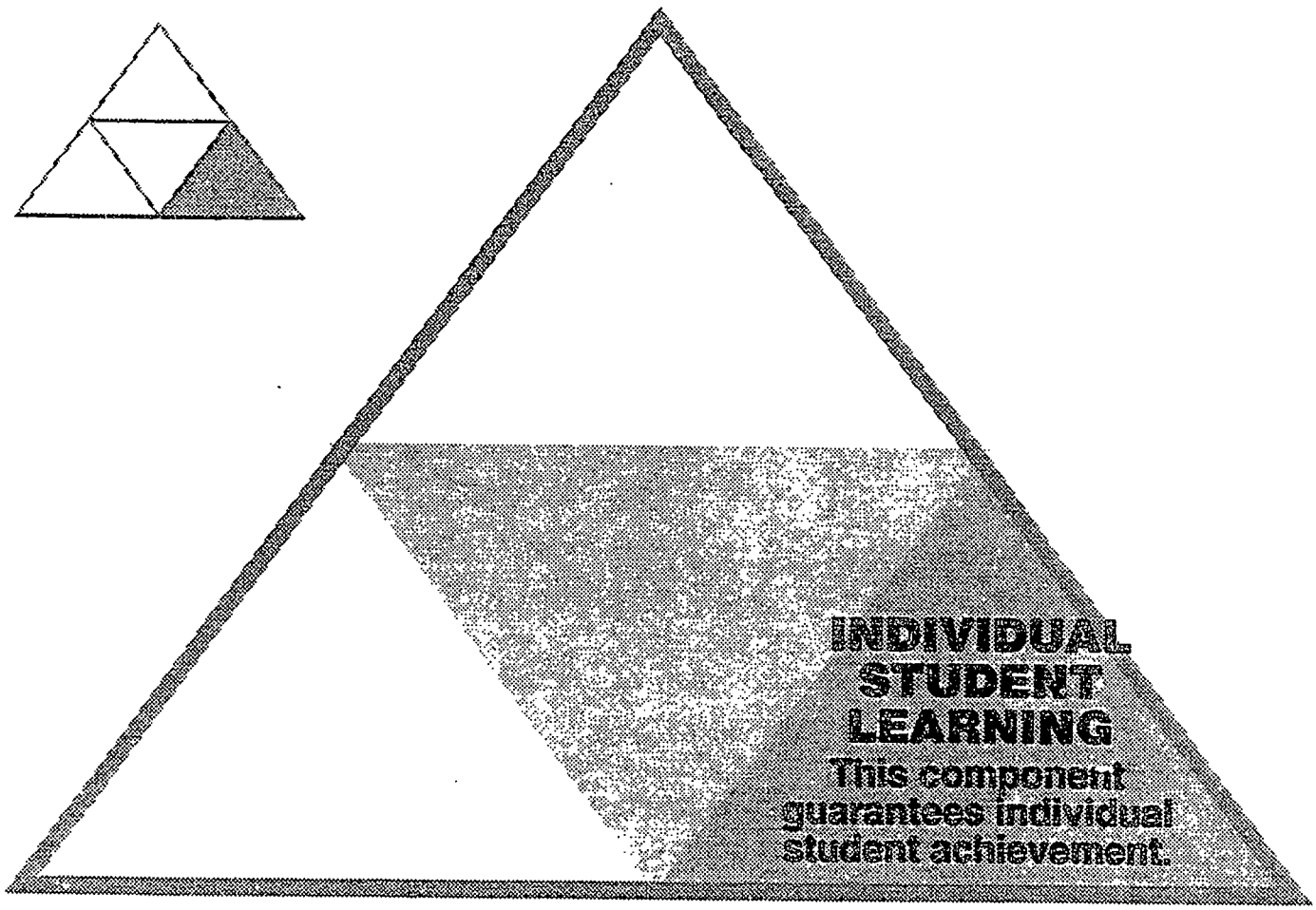


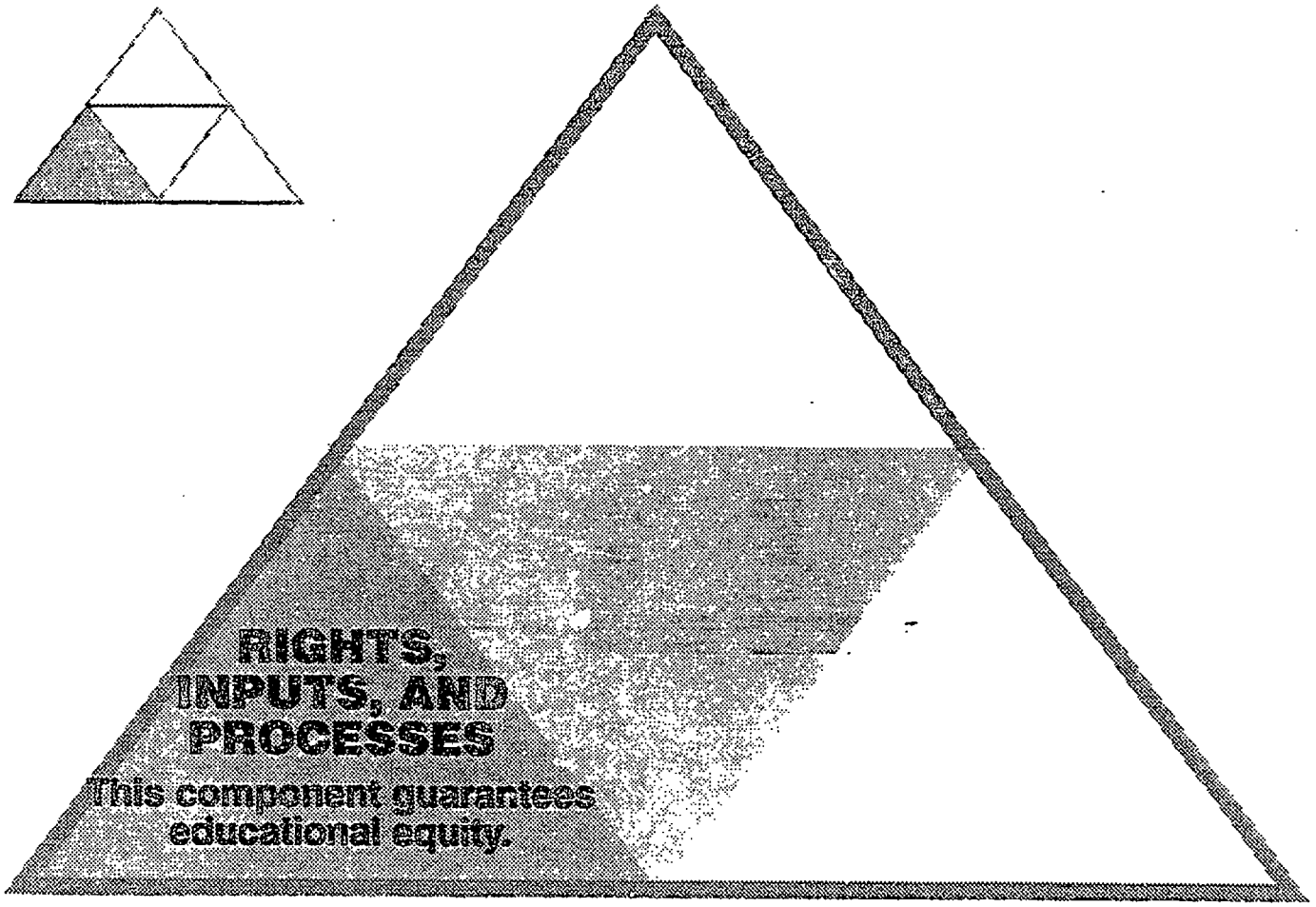






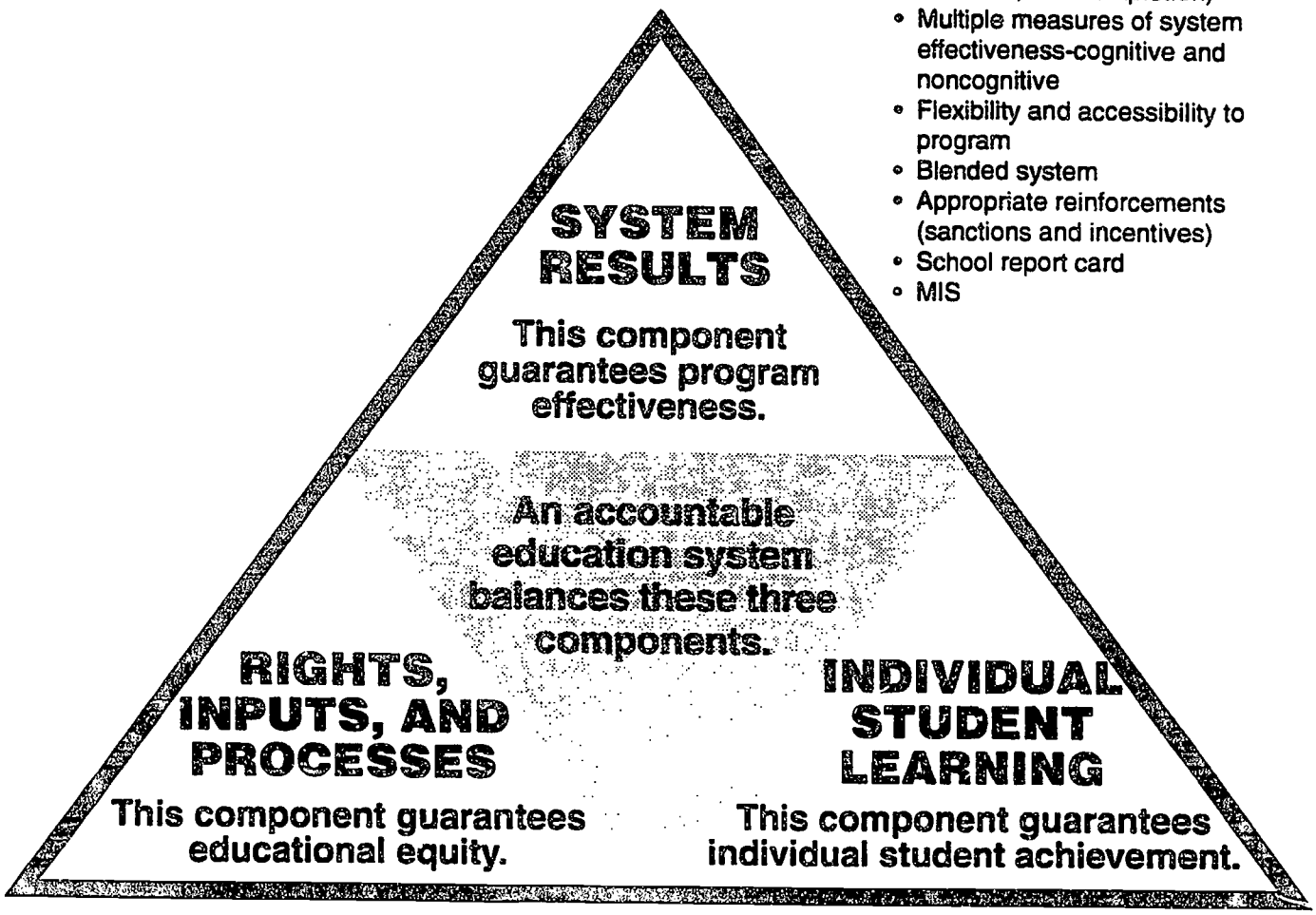
Examples

- Academic/nonacademic standards
- Individual expectations (cognitive and noncognitive)
- Multiple measures of individual student progress
- Flexibility in assessment modes
- Continuous progress with benchmarks along the way
- Parent involvement
- Teacher empowerment
- IEP



Examples

- IEP
- LRE
- Access standards
- Procedural safeguards
- Parent involvement
- Staffing credentials
- Finance
- Staff development
- Policy development
- Diversity
- IDEA
- MIS
- Demand for use of effective practice



Examples
- Standards
- Continuous improvement
- Curriculum
- Baseline data
- Staff development
- Ongoing measurement
- Longitudinal studies
- Multiple indicators (dropouts, retention, and completion)
- Multiple measures of system effectiveness-cognitive and noncognitive
- Flexibility and accessibility to program
- Blended system
- Appropriate reinforcements (sanctions and incentives)
- School report card
- MIS

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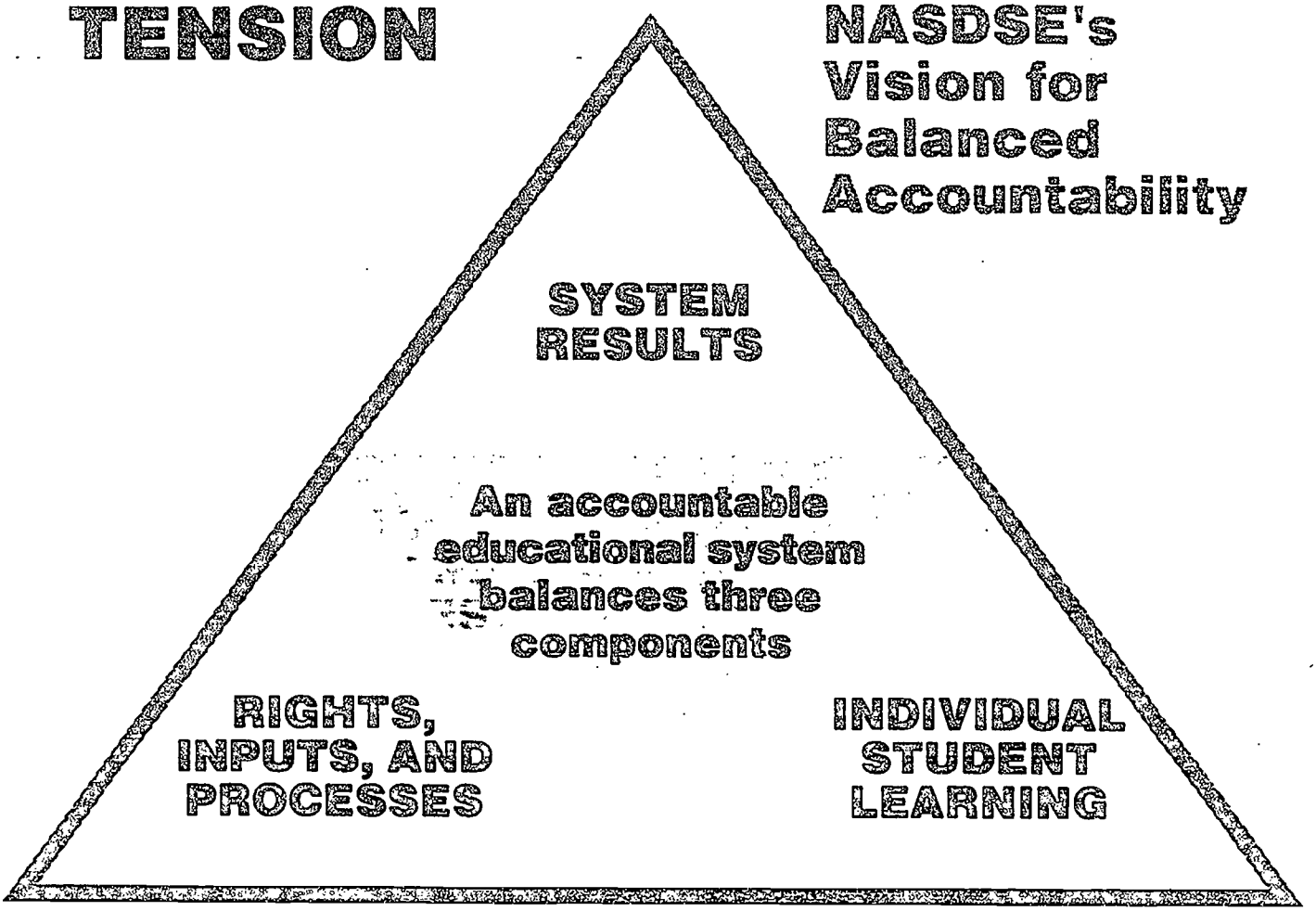
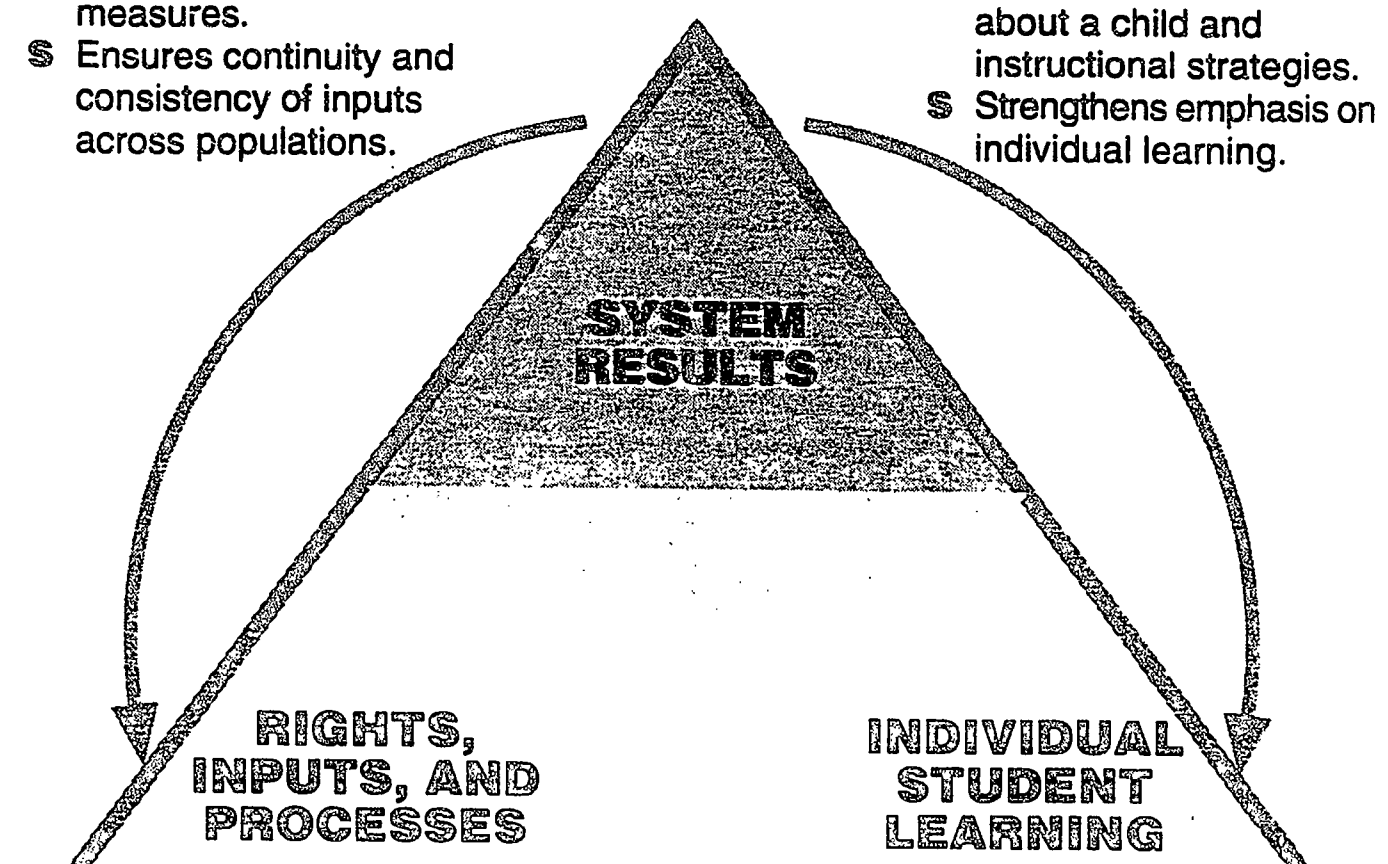
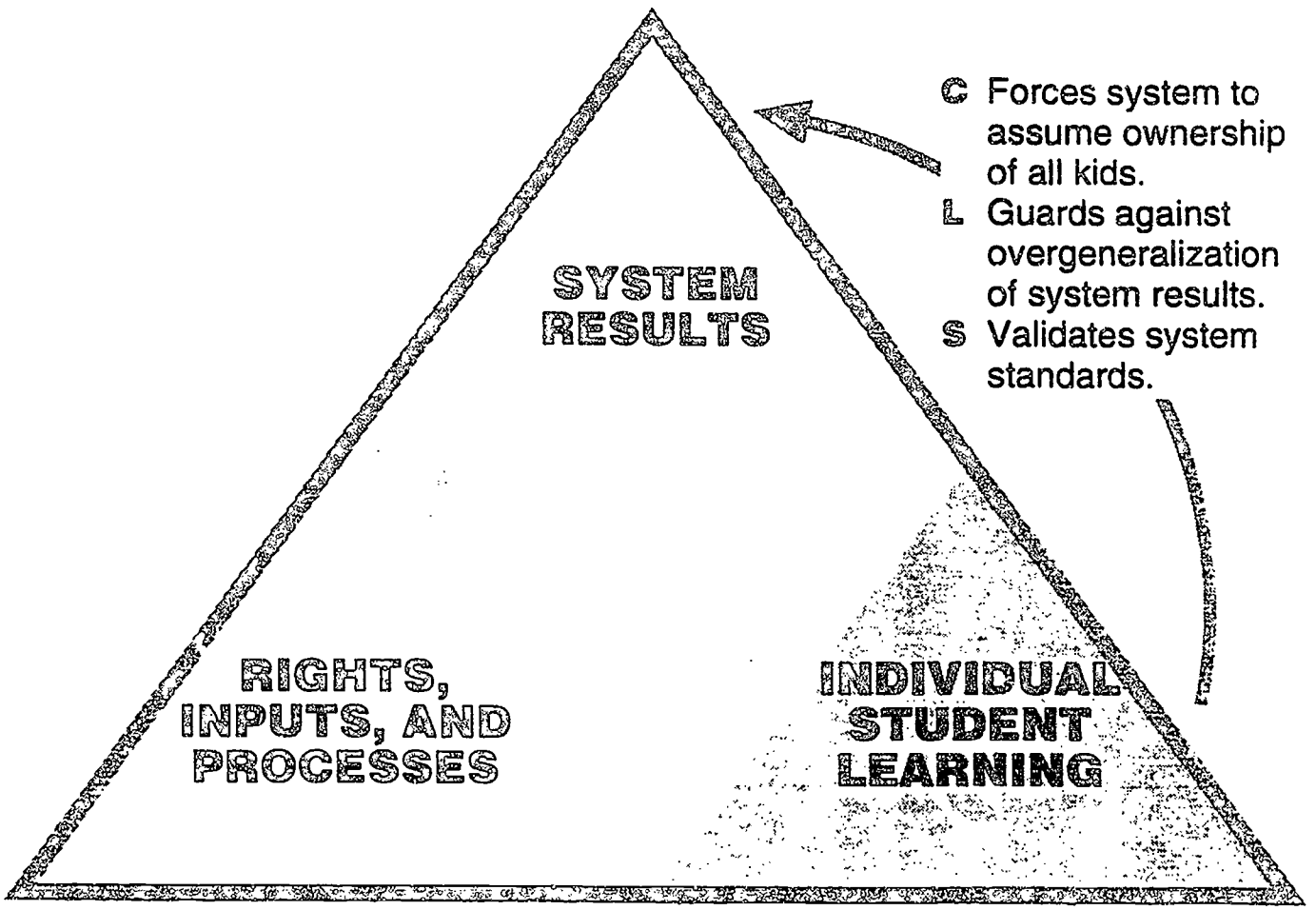


- C Shapes inputs required to achieve results.
- L Demands constant renewal of inputs/process measures.
- S Ensures continuity and consistency of inputs across populations.

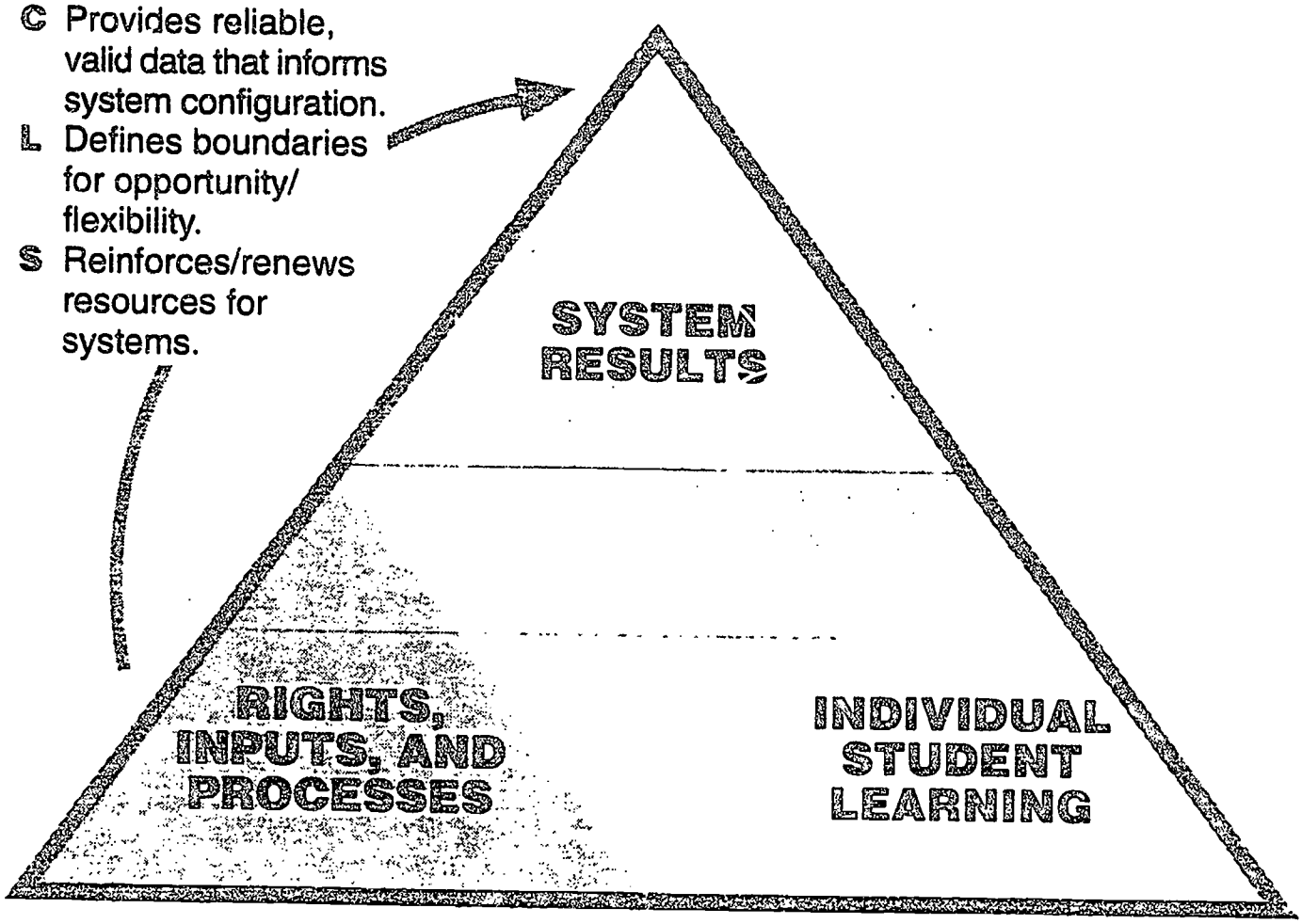
- C Demands high expectations for teaching.
- L Requires connection between what we know about a child and instructional strategies.
- S Strengthens emphasis on individual learning.





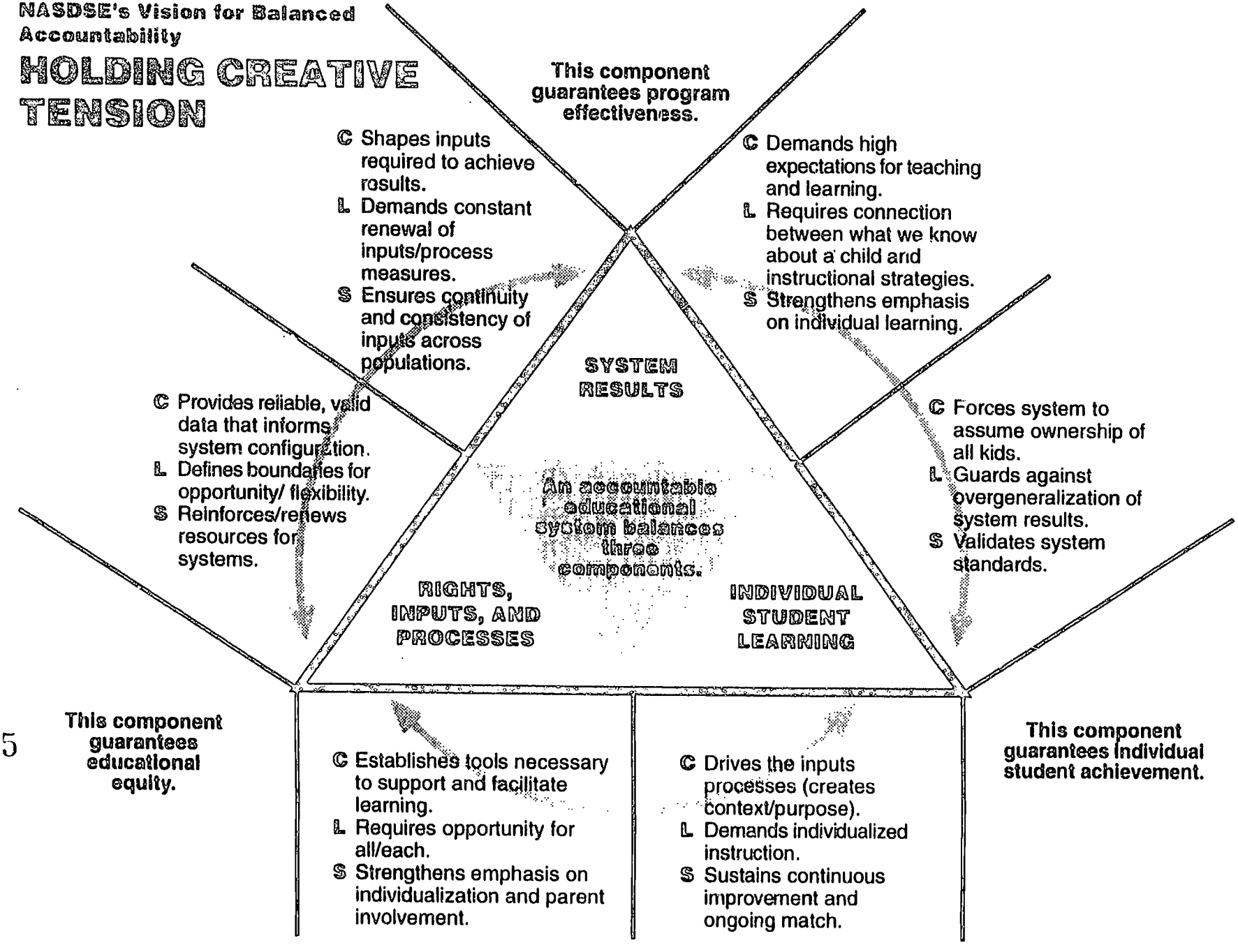
C Forces system to assume ownership of all kids.
L Guards against overgeneralization of system results.
S Validates system standards.

C Drives the inputs processes (creates context/purpose).
L Guards against overgeneralization of system results.
S Validates system standards.

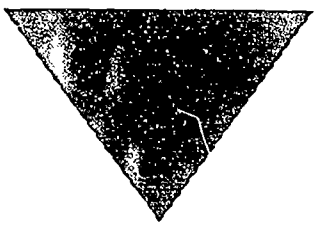

C Provides reliable, valid data that informs system configuration.
L Defines boundaries for opportunity/ flexibility.
S Reinforces/renews resources for systems.
SYSTEM RESULTS
RIGHTS, INPUTS, AND PROCESSES
INDIVIDUAL STUDENT LEARNING
C Establishes tools necessary to support and facilitate learning.
L Requires opportunity for all/each.
S Strengthens emphasis on individualization and parent involvement.

NASDSE's Vision for Balanced Accountability

HOLDING CREATIVE TENSION



ALL MEANS ALL.



ALL MEANS EACH.