An Evaluation of Virginia's Standards of Accreditation: Factors that Foster and Impede Local-Level Discretion in Implementation

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We apply a utilization-focused evaluation approach to an evaluation of Virginia's latest comprehensive accountability policy—the Standards of Accreditation (SOA). Our study focuses on the implementation experiences of district and high school level administrators in four urban districts. This study is significant in two important ways. First it provides an example of UFE approaches to policy analysis and evaluation. The literature on UFE supports the approach's application to policy analysis, but its use in this arena has been limited. Second, our study provides important insights for evaluation stakeholders formulating and implementing complex accountability policy, particularly in early phases of implementation. Our findings explore how and why local level administrators understand each of the new standards, what factors shape those understandings, and then how the case districts and schools respond to each of the SOA. Our findings illustrate how, along one dimension, stakeholders' understandings of the standards are related to factors that influence their sense of implementation efficacy. Along a second compliance-continuous improvement dimension, administrators' leadership experience and change-oriented mindsets appeared to determine how they responded to the new policy regime. We present conclusions and recommendations for key stakeholders and other students of policy analysis and evaluation.

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This paper reports on the early implementation experiences of new state education accountability standards in Virginia. Framed as a utilization-focused evaluation, we sought to capture four districts' experiences early in the adoption of the Virginia Standards of Accountability (SOA). Specifically, and according to the needs of key evaluation users, the study reports on how administrators in four districts made sense of the new SOA, a set of policy indicators designed to allow for broad implementation discretion at the local level. How local level district and school leaders responded to the discretion allowed under these new standards was a key area of focus in this evaluation study (Ganon-Shilon & Schechter, 2019; Spillane, Reiser, & Reimer, 2002). The new SOA were developed to complement the long-standing Virginia Standards of Learning (VA Department of Education, 2018). Where the Standards of Learning focused on specific academic content and achievement, the SOA were designed to encourage district and school focus on continuous improvement, student academic growth, and student engagement with school and learning (VDOE, 2018).

The SOA focus on five areas divided into categories for academic performance and student engagement. For example, under the performance category schools are evaluated on student progress in English, mathematics, and science. Districts and schools are measured on their progress in closing achievement gaps in English, mathematics, and science, and on ELL student progress toward English proficiency. Under the student engagement category districts and schools are evaluated on 1) progress toward lowering chronic absenteeism and dropout rates and 2) participation and achievement in college, career, and civic preparedness (VDOE, 2018).

Purpose and Research Questions

Guided by conversations with the intended users of the evaluation – state department of education officials – the purpose of this evaluation study was to understand how the new policies were being interpreted and responded to at the local level. In so doing, we sought to understand the responses of local educational leaders to the new policy, how they responded to the implementation discretion provided in the policy, and the reasoning behind their decisions and/or actions. The evaluation questions, co-developed with key stakeholders included:

1. How are local educational leaders in the case districts interpreting the new SOA and what factors shape those understandings?
2. Given those understandings, how are these districts responding to the new SOA policy?
3. What, if any, unforeseen challenges have emerged as a result of the new SOA and their focus on allowing for local discretion?

Policy Implementation: A Brief Overview

This section provides an overview of how scholars have conceptualized policy implementation and various strategies for implementation in education. Our overview leads to a focus on "new public management" and how that approach has influenced policy implementation in public education. Later, we explain utilization-focused evaluation and its relevance to this study.

Policy Implementation: Evolving Perspectives

The challenge of policy implementation has continued unabated for decades as practitioners have struggled to interpret policy and transform those interpretations into action (Honig, 2006a; Walker,

2004; Werts & Brewer, 2015). Scholars have recounted the evolving approaches and choices that policy makers have used over the past decades in attempts to shed light on factors associated with implementation success, failure, and policy drift (Elmore, 1980; Honig, 2006a; Placier, et al., 2000; Tummers & Bekker, 2014; Walker, 2004). To better understand this evolution, a brief overview of the journey and shifting perspectives is helpful to understand the SOA policy approach.

As Elmore (1980) argued decades ago the focus on policy implementation began in the 1960s with the "war on poverty's" massive infusion of federal dollars aimed at solving the nation's most persistent social problems, including education. Policy designers of the era assumed that implementation fidelity would be ensured across multiple levels without regard for political pressures, resource challenges, and/or requisite knowledge and skill (e.g., Evans, 2010; Lipsky, 2010). This rational model fell short as unaccounted for factors (e.g., context, environment, individual characteristics) stymied policy intentions.

Since the 1970s and 80s, policy scholars have increasingly focused on the dynamic and unpredictable challenges of policy implementation (Honig, 2006b; Malen, 2006). Elmore's (1980) argument for a backward-mapping orientation proved prescient as policy makers attempted to incentivize local actors to work in ways that maximized implementation fidelity to the intended purposes of public policies. A focus on actors responsible for realizing public policy began to surface factors that influenced policy implementation. These factors included, among other things, discretion afforded public servants as they decided how and when to implement policy. In turn, discretionary decisions were influenced by factors such as expertise, relative stakeholder power, available resources, and policy complexity (Evans, 2010; Heinen & Scribner, 2007).

As policy implementation theory and practice shifted to include dynamic challenges at the local level, the new public management approach to policy implementation made its way into the education sector in the 1990s (e.g., De Vries, 2010; Goma, et al., 2009; Møller, & Skedsmo, 2013; Tolofari, 2005). Borrowing from the Total Quality Management (TQM) movement of the early 1990s, performance management by "steering at a distance" (Kickert, 1995) surfaced as both a neo-managerialist conceptual lens and orienting philosophy approach for policy makers (De Vries, 2010). This shift intended to make a break from prescriptive policy implementation strategies toward approaches that sought to deregulate by devolving decision-making authority to street-level bureaucrats (De Vries, 2010; Tolofari, 2005). In so doing, these bureaucrats were held accountable through performance measurement of outcomes as they used local knowledge to overcome local implementation challenges (e.g., Schmoker & Wilson, 1993).

Policy implementation has posed a challenge across each of the aforementioned eras (Fowler, 2012). In large part, these challenges stem from the ways in which implementors make sense of policy (Weick, 1995). In particular, educational scholars have demonstrated that sense-making is influenced by individual cognition shaped by prior knowledge and experience, but also by the social, political, and economic contexts within which those actors operate (Coburn, 2005; Ganon-Shilon & Schechter, 2019; Werts & Brewer, 2015). Studies show that these factors, for instance, have shaped how school leaders use their knowledge and status to shape how others understand policy, but school leaders' understandings are also shaped by context (Coburn, 2005; Honig, 2006b). Put simply, actors can manipulate or be manipulated as a result of their participation in the policy implementation process.

The emergence of performance management manifested in federal and state education policy has affected policy evaluation and evaluators as well (Rogers, 2008; Goma, et al. 2009). Complex policy implemented in diverse ways across myriad contexts creates new challenges

that require flexible evaluation approaches. The complexity of these education policies manifests itself in terms of district size, wealth, urbanicity, leadership expertise, teacher quality, etc., creating myriad micro-policy contexts across regions and states. Most policy implementation and sensemaking studies explore relatively singular policy foci. However, questions remain regarding the impact of complex and wide-reaching accountability policy on large numbers of school districts with educational leaders representing an infinite array of individual capacities and implementation contexts. As a result, policy researchers and practitioners have called for evaluation studies that address the processes as well as outputs and outcomes related to large-scale policy interventions (e.g., Wilson, Floden, & Ferrini-Mundy, 2001; Scribner, et al. 2019).

Our utilization-focused evaluation (UFE) approach engaged stakeholders early on to determine what, specifically, stakeholders needed to know and understand in order to make future changes in support of school districts (Patton, 2008). These discussions identified the need to explore how the logic of the SOA policy played out in local district contexts. We worked with stakeholders to develop a plan that would explore how local leaders interpreted and responded to the policy. Also important to the key stakeholders were possible unintended consequences or factors that influenced implementation success (Patton, 2017).

Design and Methods

The UFE approach offered a framework for, among other factors, helping come to understand and articulate their actual wants and needs regarding the evaluation (Patton, 2017). Further, the approach engaged the evaluation team in ways that increased the likelihood that the evaluation outcomes would be useful to the current and future needs of those responsible for the policy issues being evaluated. Specifically, we held multiple discussions with state department of education officials to ensure a mutual understanding of the goals for the evaluation. Finally, we note that extending UFE beyond program evaluation and into the realm of policy evaluation has long been acknowledged, but seldom used (Lester & Wilds, 1990; Patton, 2008).

As a result of these conversations, and guided by department officials' needs, we focused on a cluster of urban school districts in one region of the state. We designed an embedded, multi-case study (Herriott & Firestone, 1983; Merriam, 1998; Scholz & Tietje, 2002). The primary units of analysis were districts embedded in one state context. Key stakeholders also wanted preliminary insights into secondary school experiences with policy implementation. Therefore, we included one high school from each of the four districts, so we could explore school-level SOA policy implementation and any unintended consequences or issues that might arise. We chose this vertical design based on key stakeholder needs in order to provide a focused examination of the implementation experiences across multiple districts and secondary level experiences.

Data Collection

Interviews served as the primary data source. Each superintendent provided access to other staff with leadership and management responsibilities in areas related to the five SOA areas. In each district, we interviewed central office personnel charged with overseeing implementation of elements of the SOA; we also interviewed at least one high school principal in each district. Overall, we interviewed 19 district and school level administrators across districts with

responsibility for overseeing the SOA implementation process. We also interviewed the state superintendent of education and the state education department's director of research – the two state administrators most responsible for the development and implementation of the policy. In all, 21 interviews were conducted with state, district, and high school administrators.

Interview questions focused on participants' understanding of the SOAs, how they approached implementation, and how and why they responded to the various policy elements. We also explored questions regarding their objectives, activities and strategies, assumptions and expectations for their decisions. Documents served as the secondary data source. Specific documents included state department of education regulations and information and school level strategic plans and school improvement documents.

Data Analysis

Data analysis followed conventional qualitative procedures (e.g., Strauss and Corbin, 1998; Bogdan and Biklen, 2013). Analysis involved, first, carefully reading and reviewing interview transcripts and documents. These reviews led to coding sessions in which codes and categories related to our areas of interest were developed. Researchers took care to cross-examine each other's coding and resolve interpretive differences where they occurred. We also engaged key stakeholders at each site toward the end of our data analysis to ensure that our findings reflected stakeholders' experiences. We also were sensitive to coding for substantive content around the specific SOA areas, as well as environmental influences (e.g., politics, resources), assumptions and dilemmas or challenges. Coding led to later rounds of categorizing and theorizing to develop broader categories around which we organized our findings.

Findings

We present our findings according to the major standards of interest to our key evaluation users: chronic absenteeism, graduation rates, academic performance, and college, career, and civic readiness. We considered how our interviewees made sense of the new standards, how district and school administrators responded to the standards, and why.

Chronic Absenteeism and the Issue of Locus of Control

Administrator Beliefs about Absenteeism and District/School Influence

We found that across each of the four case districts interviewees recognized chronic absenteeism as a critical issue related to student and school success. However, equally important, these administrators also believed that the sources and reasons for students' chronic absenteeism were the least "leverageable" standards of the new SOA. In other words, these administrators argued that the reasons behind and solutions for chronic absenteeism rested outside of districts' and schools' spheres of influence. For example, administrators often described chronic absenteeism as an area that primarily belonged to parents, giving the schools and districts little control of students' attendance to school. As one administrator said:

> I think attendance is often related to families and family priorities and while we have a responsibility, public education, to evolve families from that, I think we have limited resources when it comes to helping hold families accountable.

Further, interviewees expressed that chronic absenteeism reflects the ongoing challenge that parents do not recognize the relationship between the consistent attendance and student learning.

Responses to chronic absenteeism indicator

In spite of the uniform belief among these administrators that the chronic absenteeism indicator was the least "leverageable" standard for districts, they also agreed that both schools and parents should be held accountable for student attendance. Still, our data showed little in the way of innovative responses to the absenteeism indicator. In three of the four case districts during this first year of SOA implementation, little or no action to implement programs or other actions addressing chronic student absenteeism had been taken. What actions were described fell into traditional compliance approaches to policy implementation and relied on limited resources such as school attendance officers.

More often, we found district and school level personnel struggling to understand their role vis a vis the absenteeism challenge. In these districts, our participants believed that proven interventions either did not exist or that barriers to information sharing between districts limited their learning regarding what strategies worked for similar districts. Chief among these deterrents to action were what one district administrator described as "a vast discrepancy in the collection and monitoring of absenteeism data between and among schools within the same district" and "the challenge of how families are engaged across schools that district leadership may not be fully aware of." The lack of awareness of systemic solutions caused these administrators to focus their attention on other elements of the SOA while putting absenteeism interventions low on their priority list.

However, administrators in one case district were more proactively grappling with ways to address the new absenteeism standard. These leaders understood the interconnectedness between chronic absenteeism and the degree to which students 1) found value in their learning and 2) experienced meaningful relationships with teachers and administrators. Participants from this district described early efforts to draw on parents, teachers, and school communities as resources to develop more engaging school and classroom communities in ways that would increase student attendance. Interviewees stated, unequivocally, that if school staff expected students to come to school regularly, it must be a place where they want to be. To this end, administrators discussed how school level personnel must combat chronic absenteeism by fostering high quality instruction and creating school cultures in which students are supported and have the resources needed to stay engaged throughout their tenure in school.

Data also suggested that these administrators had begun to shift resources in order to adequately address the absenteeism indicator. One school level administrator from the aforementioned district described the traditional approach to absenteeism, something this principal argued had to change: "in high schools the school attendance secretary is often the primary point person focusing on the absenteeism problem, and only in the most cursory ways." This administrator argued that to address absenteeism directly was a "fool's errand." But rather, the root causes of chronic absenteeism needed to be addressed by involving a host of professionals in developing interventions—professionals such as social workers, parents, teachers, and even the courts. In spite of these more strategic approaches to addressing chronic absenteeism, the consensus among these administrators was that the current district- and school-level systems could identify the problem but lacked the capacity to delineate who within the system was responsible for curbing chronic absenteeism.

Another administrator from this more proactive district noted, the chronic absenteeism indicator prompted leadership to more explicitly address attendance in its 5-year strategic plan with more relevant and actionable goals and objectives to be presented during the opening weeks of the 2018 school year. As one administrator from this district described, "we have more actively and openly used baseline attendance data to set new targets and analyze the attendance data to formulate better and more strategic ways to address absenteeism in our schools." This district, as the administrator continued, "used baseline data to determine which students were chronic absentees." With these data, the district was able to inform parents or guardians, continuously monitor students, and also create school-level teams to follow up with specific students and families. These responses not only focused on instructional aspects of the student experience, but also on ways to mitigate challenges posed by poverty, homelessness, etc., that traditional engagement efforts alone would not overcome.

Finally, this district's high school principal described how the district had instituted a comprehensive public relations and communications plan. He stated, "we put in place a standard approach to communication to make sure that all communications to families from schools regarding attendance were consistent across the district with a common language and message." Further, he described, "our communications with students were revised to be more constructive, like focusing on the importance of being in school and communicating what they missed when absent, rather than being punitive all the time."

Graduation Rates: Tension between Outputs versus Outcomes

Factors Driving District Perspectives: Communication and Tradition

Unlike the absenteeism standard, participants tended to perceive a greater degree of control over the new graduation standards. However, participant concerns regarding the graduation standard centered on weak vertical communication from the state department level to districts and schools. These perceived weak communication linkages limited the impact administrators believed they could potentially have, at least in the short term. Most importantly, several interviewees across the four districts stated that while the information provided by the VDOE about graduation indicators was appreciated, it was provided in piecemeal fashion causing administrators to struggle to stay abreast of, and make sense of, the new changes. Lack of coherent communication created implementation questions in the minds of local administrators limiting their vision for innovative approaches to graduation rates. Further, the lack of clear central communication had a negative impact on teachers' understanding of the new changes. According to administrators, not all teachers (or staff) were aware of critical changes to the graduation requirements, and the need for districts to fill in communication gaps exacerbated the potential for mixed and erroneous communications. As such, while administrators tended to understand the new indicators, they struggled to ensure that teachers adequately understood the new requirements. In short, clear, accurate, and comprehensive communication from the state level was critical in light of new changes regarding, for example, new requirements for graduation.

Finally, while administrators recognized that high completion rates were critical measures of school performance, they were skeptical that the new graduate rate standard would foster student engagement. They expressed concern that the intent of the SOA to focus on graduation as an outcome (i.e., graduates with skills to succeed after high school) would not be realized, and rather districts across the state would be inclined to respond to graduation rates as an output (i.e.,

percentage of students graduating). As such, district administrators across our case districts voiced concern that the new SOA standards might create pressure for district rule-bending related to graduation rates. As one high school principal worried, "the graduation rate data is susceptible to manipulation and gamesmanship, and that could deter other districts from authentically complying to the graduation rate indicator." Another district administrator put it this way, "We're really honest when it comes to [graduation rates]. For instance,…a neighboring district…has an on-time graduation rate above ours at about a percentage point or a percentage and a half, yet 60% of those schools aren't accredited."

Responses to the Graduation Indicators

In spite of the challenges, district personnel described initiating practices in support of promoting successful and timely graduation as per the new indicators. Responses fell into two themes: 1) being more intentional about including graduate support activities and practices into master plans and 2) assigning additional resources to graduation support activities. An example of a typical response to the new graduation rate requirements comes from one district that had created a master implementation plan with goals, strategies and criteria to track and measure progress related to student progress toward graduation. In a second example, a district had instituted options to make up lost credit. In this case, the district had instituted Saturday school and evening classes as a result of the new graduation standard.

In three of the four districts, respondents mentioned reallocating resources to provide the human resources to support new and renewed efforts to improve graduation rates. Aligned with the intent of the SOA, administrators generally argued that improved graduation rates must be marked by high quality education. For example, one district created on-time graduation committees to track at-risk students to ensure they were provided credit recovery options, graduation coaches, and graduate lab teachers at schools with lower graduation rates. Another district created two positions at the high school level to advance graduation efforts: Student Advancement Coaches (SAC) and School Improvement Specialists (SIS). Staff in these roles worked closely with school leadership and intervention teams at the middle and high schools. These staff members led school-based teams to identify individual student trajectories and discuss the areas of concern, diagnose and remedy student's needs, and develop intervention plans.

College, Career, and Civic Readiness: Complexity and Scope

Factors Driving District Perspectives

Factors that shaped how districts experienced and perceived the new college, career and civic readiness indicator fell primarily into two themes. First, the shear breadth of post-secondary experiences subsumed under the CCCR indicator posed considerable planning challenges to participants. District participants discussed the plethora of possibilities that the indicator encompassed, and the overwhelming implementation challenge they posed. As a coping mechanism, administrators described focusing on the college-readiness aspects of the CCCR indicator, primarily because administrators believed that they "knew how to 'do college prep'." Regarding career-readiness, administrators discussed numerous programmatic approaches for connecting students to career exploration experiences including, e.g., job shadowing, teaching

workplace skills, and internships. However, they also argued that creating, implementing, and bringing to scale comprehensive career preparation opportunities was a daunting proposition.

The breadth, complexity, and multi-dimensionality of the CCCR standard also created an "ownership conundrum" as one district administrator mentioned. Administrators described how the enormity of the indicator raised questions about who would take administrative and instructional ownership for the CCCR indicator. Some administrators argued for a comprehensive state strategy to address CCCR, rather than leaving it to schools to figure out; an idea that, ironically, runs counter to the underlying philosophy of discretion under the SOA policy. Other administrators argued that district and school leaders should look outward to external partners to create a multi-faceted CCCR strategy.

District Responses to the Complex Challenge of CCCR

During this first year of the SOA policy, district responses to the CCCR indicators were limited, in part, due to the state's choice to not begin measuring CCCR outcomes until year-two of the SOA roll-out. But, in practical terms, administrators we interviewed already demonstrated concern about how to comply with such a complex and multi-faceted standard. Concern across each district focused on how to develop career and civic readiness opportunities that were meaningful, measurable, integrated with the broader curriculum, and scalable to meet all students' needs.

Further, each of these challenges was complicated by the cultural and political pitfalls that come with questions about the purpose of schooling. Across school districts, our participants understood the inherent cultural conflicts embedded in "the three C's." District administrators described how, for some of their education stakeholders, these three foci were considered to be mutually reinforcing goals. But for other stakeholders, defining the purpose of schools as college or vocational preparation, and citizenry development was at best a zero-sum game. Specifically, district administrators expressed their sensitivity to, for instance, parents for whom school was not vocational, but strictly preparatory for professional careers. Administrators also worried that some parents might interpret "civic readiness" as a political stance or attempt to indoctrinate in one form or another. Taken together, these two broad themes posed significant implementation challenges for districts who saw potential responses as highly varied and resource dependent.

Another challenge raised was the potential for parents to perceive the focus on career and civics as a threat to college preparation. Administrators suggested that many parents assume, for instance, that college and career goals are at relative odds. In other instances, principals argued that some core subject teachers see career and civic education as a distraction from college and threat to accountability testing readiness. However, these interviewees also suggested that these challenges provided more reason to ensure that clear communication from the state was required to ensure a common understanding of the CCCR standard among all stakeholders.

Finally, the scarcity of resources surfaced again as an area of concern. The variety of potential approaches to achieve CCCR, coupled with limited resources to do so, presented a conundrum for administrators. We found a relative dearth of concrete responses to the indicator. The most significant response was the result of one district's long-term, on-going efforts in career education. This district had created a strong career preparation culture and infrastructure that had taken root over the years. The district's career centers were dedicated to specific professions that included partnerships with local industries. Students could attend the career center of choice regardless of attendance area.

Smaller scale responses were noted in some other districts in this evaluation. Typifying these responses were such actions as the reassignment of personnel to oversee implementation of the CCCR standard. For example, one district hired a career coach whose responsibility was to support CCCR across three high schools. A district administrator stated that while the goal was to have a career coach at each high school, the current career coach was simply attempting to facilitate student opportunities for career exploration for students across three high schools.

Performance Levels and Growth: A Sense of Familiarity

Factors Shaping Perspectives on Performance Indicator Implementation

District and school level administrators expressed high degrees of familiarity with performance indicators for mathematics, English and science, including the focus on achievement gaps for specific groups of students. Not that administrators believed the performance indicators were any less important, but the evaluation surfaced a sense that administrators were comforted by their prior experience with content-oriented performance measures and thus believed they had appropriate structures and processes in place.

However, in spite of years of experience focusing on academic performance and high stakes outcomes in core subject areas, administrators raised concerns about the new performance indicators. Some concerns stemmed from a lack of full understanding regarding how districts would be judged on these indicators. For example, one district expressed concern that some districts might be unfairly penalized under a proposed *post hoc* process that took a three-year average for subgroups of less than 30 students. These administrators believed that it would be fairer to set up a three-year average going forward under the new indicators. In short, there seemed to be concern in one district that it was initially advised by VDOE they would have three years to increase subgroup achievement, but in actuality they will have one year.

Another concern peculiar to one district was the potential for lost instructional time due to their structure of career academies. Specially, the concern was that some students (disproportionately representing underserved populations) would lose valuable instructional time in math, English and/or science due to zoning and transportation issues as those students traveled to academies outside their zone. As one of this district's administrators stated, "It's ironic how by addressing one standard [CCCR], we could be potentially suffering under another [academic performance]."

Lack of resources again cropped up as a factor that shaped administrators' implementation considerations. For example, in one district, administrators worried that their desire to focus more on academic performance, especially with regard to subgroups, was hampered by the school board's unwillingness to provide resources to strengthen the instructional corps in those academic areas.

Finally, administrators also identified a misalignment between the federal Every Student Succeeds Act and VDOE requirements for mathematics that could create negative outcomes on schools and students. Most notably, under Virginia's standards students only need one verified mathematics credit to graduate. However, the verified credit can often be earned in algebra I that some students earn in middle school; yet, new graduation requirements require students to earn their verified mathematics credit in high school. This situation decreases the number of opportunities that students have to meet the proficiency standard, especially if they are on the

accelerated track and earn both the Algebra I and Geometry credits while in middle school, thus introducing a new limiting factor for students and schools.

Responses to the Performance Standards

Each of our districts described implementation responses to the new performance standards that should stoke optimism among policy makers. For example, numerous administrators described how student performance and success in the classroom was, in large part, an issue of engaged classroom learning. Administrators acknowledged that fully engaging students in the learning process should be a primary goal in all subjects – particularly, those measured under the new standards. These administrators argued that by achieving authentic and engaged learning, improvements in attendance, progress toward graduation, and the perceived future relevance of students' current education would result. One district official went so far as to say that the proficiency standards drive success with the other standards and associated indicators.

Beyond engagement strategies, administrators also described strategic changes to school structures and processes to optimize students' experiences already underway. For example, in one district, administrators have focused on intentionally scheduling students and teachers to find the best fit for students and more purposefully organizing master schedules to allow certain teachers to co-plan and co-teach students requiring additional support. In other instances, administrators described increased frequency of data reviews to focus on all sub-groups and the assignment of additional counselors to help identify and monitor students in need of support.

Discussion

In considering our evaluation findings, their interpretation, and application, we remained committed to our UFE approach. We offer our reflections of some of the issues that our key stakeholders and street-level implementors might find useful as they continue to refine policy directives and support and/or grapple with the day-to-day of policy implementation.

In placing key stakeholder needs first, we centered our focus on understanding how local district and school leaders were experiencing implementation of the new SOA accountability policy. As the reader may recall, the policy was designed to allow for maximum decision-making discretion regarding implementation. And thus, we focused our evaluation questions on local experiences with implementation and how local stakeholders took, or did not take, advantage of an accountability policy that focused on outcomes, but allowed wide latitude for program level decisions.

Our findings and analysis support the consideration of two dimensions that, we argue, should be used to guide future decisions related to implementation support at the local level. The first dimension focuses on the relationship between a given standard and local level stakeholders' sense of implementation efficacy vis a vis that standard and associated indicators. The policy factors and characteristics that we found influenced implementation efficacy included 1) the perceived locus of control, 2) the breadth and complexity, and 3) the familiarity and past experience with procedures and practices related to the standard.

Our findings showed that administrators in our districts were sensitive to the perceived locus of control of each individual indicator within the standard. Further, how stakeholders perceived their level of control over the standard or its indicators shaped how stakeholders understood and responded to each standard. Extant theory on policy implementation sheds some

light on how and why locus of control was an issue. We believe that administrator experience and prior knowledge influenced their sense of implementation efficacy with regard to some aspects of the SOA, such as graduation rates and student academic performance (Coburn, 2005; Spillane, et al, 2002).

We argue that the perceived breadth and complexity of a standard in the minds of stakeholders can influence their implementation efficacy. For example, local stakeholders across case districts believed the enormity and complexity of the CCCR standard threatened their ability to implement it in its multi-faceted form. However, our study points to the importance of individual administrators' dispositions toward change (Spillane, et al., 2002). As our findings illustrated, some administrators in our study did not allow lack of experience to deter their attempts to implement new policies related to, for example, chronic absenteeism or college, career, and civic readiness. The perceived familiarity with the standard by stakeholders also shaped a sense of implementation efficacy for that standard. For example, across the board, district stakeholders expressed the most confidence with implementation of the performance standards, primarily because they perceived that this standard was essentially the same as past performance standards, albeit with some important differences.

However, we also offer that perceptions of implementation efficacy paint only part of the picture. We noted evidence of a dimension ranging from simply compliance- to more complex continuous improvement strategies related to implementation. These responses may be influenced by factors such as leadership experience with accountability policy and/or change-oriented leadership (Gagnon-Shilon & Schechter, 2019). In most cases, three of the districts' stakeholders responded to policy implementation in less-than strategic ways. The responses tended to overlook the interconnectedness of the myriad policies, thus missing opportunities in which one policy (e.g., performance) might leverage other policies (e.g., chronic absenteeism and graduation rates). These situations appeared to be determined by factors, such as a lack of strategic vision, limited fiscal resources, limited leadership capacity, or local politics. On the other hand, in one district in which stakeholders demonstrated clear strategic-minded leadership these leverage opportunities were put to use. In this case, implementation responses were multi-faceted, focusing on "driver" policies that helped leverage action and improvement on other policies. For example, we noted that the more strategically-oriented district sought to focus on core issues that influenced performance—issues such as teacher quality, engaging learning activities, better communication with parents, and so on. In these ways, a focus on learning would also improve communication with parents, which in turn would improve attendance rates, subgroup academic performance and other key factors within the SOA. Also, of relevance here was the change-oriented leadership approaches of this district's stakeholders. This points to the important role of experience with organizational change and improvement as part of a leader's toolkit when leaders are expected to implement complex and far-reaching accountability policies.

Conclusions and Recommendations

This evaluation of early stage, state-level policy implementation in four districts provided useful insights using a UFE framework for the principle users of the evaluation, state level administrators. While much can be learned from the findings above, we distill those lessons into a few conclusive statements, and then provide our thoughts on recommendations.

First, we conclude that approaches to policy implementation that allow for wide discretion with regard to means must not take for granted myriad internal and external factors

that influence an already complex implementation process. Simply allowing implementors the latitude to make their own context-appropriate decisions does not account for internal and external factors that also influence choices and the discretion to make those choices. Second, each implementation locale is defined, uniquely, by its stakeholders' characteristics, experiences, and capacities. Factors such as perceptions of locus of control, complexity, and familiarity or experience with a specific standard will intersect and play out differently in each district setting. And finally, how policies are implemented (e.g., piecemeal and compliance-oriented, or strategically) is more dependent on local capacity and leadership than, for example, insightfulness or flexibility at the policy making level (in this case the state level).

Our recommendations to key stakeholders center on improved communication and capacity building. First, vertical communication down through the system must be more purposeful, supportive, and aware of the role unique contexts play. For example, state communication should acknowledge that different standards within a policy bundle will have varying impacts and require different resource sets across districts. Therefore, we recommend that the state take a more proactive role in learning opportunities within and between districts encouraging and allowing implementors to share ideas and experiences. In this manner, gaps in leadership capacity and experience that impact implementation can be minimized. Finally, at the district and school level, administrators must acknowledge the importance of having leaders experienced with organizational improvement who are able to recognize the interconnectedness of large-scale accountability policy in ways that leverage district strengths as we saw in one case district. This type of strategic leadership can be nurtured and, thus, its development should be prioritized.

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