

CRITICAL AREA OUTLINE: ACCOUNTABILITY

As state leaders consider the transition to the Every Student Succeeds Act (ESSA), every state has the opportunity to move from a No Child Left Behind-like accountability model based on measuring, sorting and labeling to a coherent system where information collected is thoughtfully and deliberately tied to outcomes desired, based on the state's unique context. Designing an accountability system should first start with key questions of purpose, including: what are the outcomes you are hoping to achieve for students in your state, what needs to change to achieve those outcomes, and what information do you need to inform that change? State leaders also will consider how your system will help to drive the right actions by students, parents, teachers and administrators. For example, if increasing student performance for students with disabilities is a key priority, what are the indicators that could best drive the change needed? As part of this effort, state leaders will likely want to analyze current accountability systems in the context of your vision to determine what elements you will want to maintain and how you want your system to evolve. Key questions your Chief will likely consider include:

- What is the most important outcome for this system?
- What parts of the current state system are driving the desired outcomes and what does the state not like/want to change?
- What are the non-negotiables for the state Chief in the accountability system?
- What indicators does the state want to emphasize?
- How does the state accountability system drive the behaviors and instructional practices desired in the state?
- How will the reported information be used?
- How is the state accountability system informing the state's strategy for supports and interventions (please see *School Improvement and Supports* section)?

STATE VISION

How does your Chief's vision impact the decisions you will have to make? Ensuring you have a clear understanding of the outcomes your Chief is prioritizing will help to inform your work and how you engage with internal stakeholders within the state education agency (SEA) and external stakeholders outside the agency to move toward a coherent ESSA transition strategy. Overarching questions you may want to consider as you begin work on the accountability system:

- Do I know my Chief's overall state strategic vision?
- What does my Chief hope to achieve through our state's accountability system?
- How does this area of work fit in with the other key ESSA transition areas to create a comprehensive system?

OPPORTUNITIES AND RESPONSIBILITIES

As you continue to engage with your Chief and other members of your state leadership team, you will get into a much deeper level of detail with respect to the decisions you will be making about your accountability system design and how your system informs and drives the supports and interventions you provide to schools and districts.

What do you see as the biggest opportunities & biggest changes in the law? The plan considerations below and in the *School Improvement Supports* outline identify ways to consider building systems of college- and career-ready accountability and supports in an integrated, coherent manner – focusing on the principles and the tight connections among them – to promote a complete theory of action in each context and a process of continuous improvement toward outcomes desired for all students. Building off of the Chief-driven questions above, the questions in this guide are meant to serve as a tool that can highlight opportunities, guide considerations and design decisions throughout the development of these integrated and coherent systems. The outline is intended to identify opportunities for state leadership (things each state COULD do); ESSA requirements (things each state MUST do within its broader leadership); key points for equity; resources and state examples; and examples of deeper dive questions that merit additional national attention, specific state consideration, or both. It is meant to guide immediate decisions required under the law for the 2017-18 school year, as well as continuous improvement to accountability, supports, and intervention systems over the coming years¹.

As with all of your work to prepare for the transition to ESSA, no one topic should be treated in isolation; therefore, cross-cutting issues are reflected in the tables that follow. These are meant to be read and considered in connection with the other CCSSO *Critical Area Outlines*. Specifically, there are areas within both accountability and school improvement supports that are interrelated. A section below focuses on that intersection.

¹ To support your work in this area, CCSSO, in collaboration with EducationCounsel LLC and Achieve, developed a more comprehensive resource on this topic, *Continuously Improving State Systems of Accountability and Supports: A Roadmap for State Leadership under the Every Student Succeeds Act to Advance College and Career Ready Outcomes for All Students*.

KEY CONSIDERATIONS IN ACCOUNTABILITY SYSTEM DESIGN

1. College- and Career-Ready Alignment: Align accountability system goals with the broader goal of helping all students master the knowledge and skills necessary for success in college and careers.	
<p>Opportunities for State Leadership</p> <p><i>Each state COULD...</i></p>	<ul style="list-style-type: none"> Establish college- and career-ready state standards, and align accountability system goals with college and career-ready performance. Define college and career readiness from early learning through K-12 grades to include the full range of deeper learning knowledge, skills, and dispositions – academic, interpersonal, and intrapersonal – that evidence shows are necessary for success in college, careers, and life. Use this robust definition of college and career readiness to create a clear line of sight for all state policies and practices including accountability and supports.
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> Set challenging state academic standards aligned with entrance requirements for credit-bearing coursework in the state’s system of public higher education and relevant career and technical education state standards. ESEA § 1111(b)(1)(D)(i). Use those standards to carry out systems of assessment, accountability, and school improvement (ESEA § 1111(b), (c), and (d)).
<p>Elevating Equity</p>	<ul style="list-style-type: none"> Establishing a clear state definition and high standards for college and career readiness can set equitable, high expectations for all students. Including higher-order skills can ensure that the system focuses on developing a full range of college- and career-ready knowledge and skills for <i>all</i> students.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> CCSSO, <i>Knowledge, Skills, and Dispositions: The Innovation Lab Network State Framework for College, Career, and Citizenship Readiness, and Implications for State Policy</i>² State examples, such as ESEA Flexibility Waivers (e.g., OR, WA, NH); WV <i>College and Career Readiness</i> definition;³ ME Learning Results⁴ and Guiding Principles⁵
<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> What do we know about the range of knowledge and skills necessary for success in college and careers, and how do they align from early learning through K-12 education?

² http://www.ccsso.org/Resources/Publications/ILN_CCR_Framework.html

³ <https://wvde.state.wv.us/apps/tree/static/doc/college-career-readiness.pdf>

⁴ <http://www.maine.gov/doe/proficiency/standards/maine-learning-results.html>

⁵ <http://www.maine.gov/doe/proficiency/standards/guiding-principles.html>

2. Annual Determinations: Make annual accountability determinations for all public schools/districts based on clear goals to advance continuous improvement.	
<p>Opportunities for State Leadership</p> <p><i>Each state COULD...</i></p>	<ul style="list-style-type: none"> ▪ Establish a clear, shared vision for the role of accountability and how it connects – as a process – to meaningful supports and continuous improvement for all public schools/districts. ▪ Make and report on annual accountability determinations for all public schools and districts that are valid, meaningful, and understandable, including through index systems and/or data dashboards (as described in section 3), and consider how you will address school classifications (including lowest-performing as well as highest-performing and/or the full range of schools, as appropriate). ▪ Consider different ways to ensure meaningful accountability goals for performance and improvement for all public schools and subgroups, such that all students are on track to college and career readiness.
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ▪ Establish a system for meaningfully differentiating on an annual basis all public schools in the state (based on accountability indicators, as described in section 3), ESEA§ 1111(c)(4)(C), and identify for support and improvement the lowest-performing schools and schools that have low-performing subgroups. ▪ Establish ambitious, state-defined long-term goals, including measurements of interim progress, on academic achievement, graduation, and English language proficiency for all students and subgroups (with the exception of the English language proficiency goal, which must be for English learners). ESEA§ 1111(c)(4)(A)
<p>Elevating Equity</p>	<ul style="list-style-type: none"> ▪ Establishing reasonable but ambitious goals for all schools and subgroups, based on multiple measures (as described in section 3), provides an opportunity to focus on closing achievement gaps. ▪ Making/reporting determinations for all public schools provides an opportunity to empower stakeholders and promote continuous improvement in all schools.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> ▪ <i>To come.</i>
<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> ▪ What could it mean to “meaningfully differentiate” schools across the full range of performance? What does that mean for classifications, and/or for data dashboards and/or index models (as discussed below) given the state’s strategic vision? ▪ What information is important for all purposes and stakeholders, and how do you distill that to be meaningful while not overwhelming? ▪ What are options/models for setting long-term and interim goals? ▪ How could a state system best integrate early learning, K-12, and higher education?

3. Focus on Outcomes: Base accountability determinations on multiple, high-quality measures that are aligned with advancing college- and career-ready goals.

Opportunities for State Leadership

Each state *COULD*...

- **Include multiple measures** in the state’s accountability system to make initial accountability determinations (and as part of deeper data reporting and diagnostics), including but not limited to high-quality assessments and accurate graduation rates, based on both **status and growth** in performance, as appropriate.
- Ensure that all metrics are **meaningful, measurable, and teachable and learnable** with regard to the goal of improving college- and career-ready student outcomes and closing achievement gaps (connected by evidence and/or researched-based presumptions).
- Consider **additional measures of the full range of college- and career-ready student outcomes**, including the knowledge, skills, and dispositions that result in college, career, and civic readiness, such as additional college- and career-ready measures⁶ (e.g., advanced course taking, students “on track,” college credit, college entrance without remediation, workforce certificates, other indicators of postsecondary opportunities); measures of engagement and/or higher-order/social-emotional skills; and those best measured through performance-based demonstrations of learning.
- Consider **additional measures of school quality and equity**, including for example, opportunity for student learning and access to critical resources (e.g., curriculum access, access to early learning, provision and accessibility to high-quality teaching/leading, funding, staffing, facilities, and technology); and school climate/environment and conditions of learning (e.g. school discipline, attendance, etc.)
- Determine **how to weigh measures** and **how to present measures** for initial accountability determinations – whether as a **data dashboard, index system, or both**, across multiple measures.
- Consider the value of and mechanism for including a mix of **state and local measures** to spur innovation and authenticity, where there is sufficient validity, capacity, scale, etc.
- Consider efforts to improve quality and utility in the state’s **system of**

⁶ Other possible measures include, for example, additional academic subjects beyond reading and math; successful completion of advanced coursework; college credit accumulation; college entry, remediation, and persistence rates; career preparedness as measured by industry certifications and other measures; performance on national or international assessments (e.g., NAEP or PISA); reading proficiency in the early grades; measures of students being “on track” at critical transition points (such as 9th grade); and measures of deeper learning/social-emotional skills (such as critical thinking, problem solving, communication, collaboration, and academic mindset).

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	<p>assessments, including the number and mix of interim and summative assessments, the inclusion of performance-based assessments, and the number and mix of state and local assessments, so that essential diagnostic, instructional, and accountability purposes are met with the minimum number of assessments needed, assessments are clearly being used for their intended purposes, and assessments meet criteria of high-quality, individually and as a system.⁷</p> <ul style="list-style-type: none"> ▪ Consider how all accountability measures and their combination advance the shifts in teaching and learning necessary to advance college- and career-ready student outcomes (such as personalized, competency-based approaches) – for example by valuing student progress toward mastery of key knowledge and skills. ▪ Consider any unintended consequences of different indicators and/or accountability designs.
<p>ESSA Requirements <i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ▪ Each state’s accountability system must be based on multiple indicators and measure annual performance on those indicators (including status and/or growth as determined by the state). ▪ The required indicators include (1) academic achievement (which may include growth) as measured by state assessments in math and reading/language arts (3-8 and once in high school), (2) one other academic indicator for elementary and middle schools, (3) graduation rates for high schools, (4) English proficiency for ELLs, and (5) at least one other indicator that is valid, reliable, comparable, and statewide (such as measures of student engagement, educator engagement, advanced coursework, postsecondary readiness, or school climate and safety). ESEA § 1111 (c)(4)(B). ▪ In making annual determinations, indicators 1-4 above must each be given “substantial weight” and “in the aggregate, much greater weight” than the other indicator(s) in 5. ESEA § 1111 (c)(4)(C). ▪ Systems must annually measure the achievement of at least 95% of all students (and students in each subgroup), and states will likely determine how this factors into accountability. ESEA § 1111 (c)(4)(E). ▪ ESSA requires state high-quality assessments in reading/language arts and math in grades 3-8 and once in high school (and grade-span tests in science) and establishes a range of assessment pilots and programs, including a pilot for innovative assessment models (up to 7 states in the first 3 years) (see ESEA § 1204); providing for locally-selected, nationally-recognized high school assessments (see ESEA § 1111(b)(2)(H); and a use of funds to audit assessment systems (for quality and burden) (see ESEA § 1202).

⁷ <http://www.ccsso.org/Documents/2013/CCSSO%20Assessment%20Quality%20Principles%2010-1-13%20FINAL.pdf>

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Elevating Equity	<ul style="list-style-type: none"> ▪ Including a range of measures aligned to college- and career-ready student outcomes provides an opportunity to prioritize efforts that will help promote equal opportunity and close achievement gaps, as well as raise achievement overall. ▪ Meaningfully including English proficiency for English learners provides an opportunity to elevate the importance of English proficiency for closing achievement gaps.
Resources/ Examples	<ul style="list-style-type: none"> ▪ Current state/district models, such as California’s Local Control Funding Formula and Local Control and Accountability Plans, the California CORE districts and Kentucky’s approach. ▪ International models including Alberta, Canada, and the United Kingdom
Sample Deep-Dive Questions	<ul style="list-style-type: none"> ▪ What do we know about the array of metrics that are meaningful, measurable, and able to be impacted with regard to advancing college- and career-ready teaching, learning, and student outcomes? ▪ What do educators and other stakeholders believe is most valuable? ▪ Within that, are you specifically thinking about non-academic indicators related to school quality? ▪ What might be most important for accountability versus deeper data analysis and diagnostic review (as described below)? ▪ What are the implications and opportunities associated with incorporating English proficiency in school accountability systems (please see CCSSO’s <i>English Language Learners Critical Outline</i> for more discussion of this issue)? ▪ What are the viable options (including under ESSA) for data dashboards and/or index models for initial accountability determinations? Is there a distinction in what you would want to use to identify lowest-performing schools versus and what’s reported as part of your school/district report cards? ▪ How can states leverage ESSA assessment provisions to best advance a system of high-quality assessments for accountability and broader, deeper purposes? How should the state address “opt-out” issues in that regard?

4. Disaggregating data: Continue commitment to disaggregation of data – for reporting and accountability – and to closing achievement gaps in education opportunity and outcomes.

<p>Opportunities for State Leadership</p> <p><i>Each state COULD ...</i></p>	<ul style="list-style-type: none"> ▪ Not only continue to disaggregate data for each measure in the state’s accountability system (discussed above) but also for additional data for improvement – by at least the subgroups including race, ethnicity, poverty, disability, and limited English proficiency.
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	<ul style="list-style-type: none"> Use disaggregated data in school accountability determinations/classifications, as required, and in targeting supports and interventions, as appropriate (including schools with lowest-performing subgroups and/or greatest gaps). Ensure that any “super” subgroups promote inclusion rather than masking certain subgroups. Establish a minimum number for subgroup reporting and accountability that is as inclusive as possible and appropriate given context, validity, need to protect student privacy, etc. Consider how best to publicly report disaggregated data for all subgroups (as discussed below).
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ESSA requires that each state set long-term and interim accountability goals disaggregated by subgroup. ESEA § 1111(c)(4)(A). ESSA requires that states annually measure and make accountability determinations for each school based on data for the school overall and for each subgroup. ESEA § 1111(c)(4)(B), (C). ESSA requires that each state/district annually report accountability data for each school overall and for each subgroup, as well as other data points. ESEA § 1111(h)(1), (2). ESSA requires that states set a statistically-sound “minimum number” for subgroup data reporting and accountability, in consultation with key stakeholders. ESEA § 1111(c)(3)(A).
<p>Elevating Equity</p>	<ul style="list-style-type: none"> This focus on disaggregated data and subgroup accountability and public reporting is one of the strongest commitments to equity maintained from No Child Left Behind. The focus on consultation with stakeholders can also be a mechanism for elevating equity in the process.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> <i>To come.</i>
<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> How can states best incorporate subgroup performance into school accountability determinations? What do we know about “super” subgroups and how they can promote inclusion versus exclusion? What factors do stakeholders feel are important with regard to determining a "minimum number" for subgroup size and with regard to "super" subgroups? How will you disaggregate data by subgroup for your non-academic indicators?
<p>5. Reporting Your Data: Report data in a manner that is rich, timely, accessible, and actionable to a range of critical stakeholders.</p>	
<p>Opportunities for State Leadership</p>	<ul style="list-style-type: none"> Consider more effective ways to produce (at least) annual state and local report cards that present key accountability data and determinations, including disaggregated data as appropriate (as in the

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<p><i>Each state COULD...</i></p>	<p>“data dashboard” discussed in section 3).</p> <ul style="list-style-type: none"> ▪ Include as appropriate additional data beyond those used in initial accountability determinations to further inform data analysis and continuous school improvement, including other data related to, for example, social-emotional skills; school climate; and access to resources. ▪ Design report cards to be most useful to key stakeholders (including teachers, principals, parents, policymakers) in terms of format, design, substance, and distribution. ▪ Consider aligning report cards with processes for continuous improvement by incorporating data gathered through diagnostic/school quality review processes (see Principle 6).
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ▪ ESSA requires that each state and district produce annual report cards and report data – overall and by subgroup, as appropriate – with regard to accountability determinations, measures used in accountability systems, and other key variables (including at a minimum, for example, preschool enrollment, access to high-quality teachers and leaders, etc.). See, e.g., ESEA § 1111(h)(1), (2). ▪ ESSA requires that these report cards be clear, concise, understandable, accessible, and developed with input from stakeholders. See e.g., ESEA § 1111(h)(1)(B) and (h)(2)(B)
<p>Elevating Equity</p>	<ul style="list-style-type: none"> ▪ Robust, timely data reporting is crucial for empowering stakeholders, focusing on equity, understanding and closing gaps in opportunity and achievement, etc. This is particularly true with regard to disaggregated data. ▪ States and stakeholders have an opportunity to work together on the design of state and district report cards to make them most meaningful, user-friendly, and useful to their purposes.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> ▪ <i>To come.</i>
<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> ▪ What accountability and other data are most important to advance excellence, equity, and continuous improvement? ▪ What models of data reporting are most effective for the array of key stakeholders and purposes? <ul style="list-style-type: none"> ○ How do you want state, district and school leaders to be able to use the information? ○ How do you want parents to be able to use the information? ○ How do you want teachers and students to be able to use the information? ▪ What impact do your decisions about data inclusion have on your data collection and reporting infrastructure?

6. Systems for General Improvement: Build statewide systems of supports and capacity to promote continuous improvement across <i>all</i> schools and districts.	
<p>Opportunities for State Leadership</p> <p><i>Each state COULD...</i></p>	<ul style="list-style-type: none"> ▪ Build statewide systems of support available to all schools and districts to enable evidence-based plans for continuous improvement. ▪ Consider requiring annual plans for continuous improvement for all public schools/districts. ▪ Build a clear delivery system and strengthen capacity (state, district, external) to help the full range of schools and districts, as appropriate. Consider networks in this regard. ▪ Consider how these systems can promote the kinds of shifts in teaching, learning, and supports necessary to help all students master college- and career-ready knowledge and skills, including shifts toward personalization, competency-based pathways, focus on cognitive and noncognitive skills, and shifts to further build professional capacity and growth (e.g., high-quality professional development, instructional leadership teams, teacher-leader career tracks and lattices, educator development plans). ▪ ESSA allows states to use up to 3% of Title I funds for "Direct Student Services" with a priority on services in districts with high concentrations of schools identified for improvement. These direct student services could indirectly benefit all schools and students in these districts by building systems of supports. ESEA § 1003A
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ▪ ESSA provides states with <i>wide latitude</i> in how they will set accountability classifications and systems of improvement beyond lowest-performing schools (discussed in more detail in CCSSO's <i>School Improvement Supports</i> outline).
<p>Elevating Equity</p>	<ul style="list-style-type: none"> ▪ Providing a full system of supports can help connect accountability more fully to resources for evidence-based improvements, and can help address achievement gaps statewide, including within school, across schools, and across districts.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> ▪ <i>To come.</i>
<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> ▪ What are the most effective state roles in building these statewide systems of support? What do districts, schools, and stakeholders most need from statewide systems of support? ▪ How can states best promote or facilitate evidence-based, comprehensive activities as part of these statewide systems of support (including through delivery systems, use of intermediaries, strengthening the market, etc.)?

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7. Continuous Improvement: Establish systems of periodic review and continuous improvement in the state’s system of accountability and supports itself, to best advance college- and career-ready teaching and learning.	
<p>Opportunities for State Leadership</p> <p><i>Each state COULD...</i></p>	<ul style="list-style-type: none"> ▪ Consider how the state’s system of accountability and supports might best evolve and improve through this period of transition and over time (e.g., with regard to measures, data reporting, supports, etc.). ▪ Establish systems of periodic review and continuous improvement for the state’s system of accountability and supports (e.g., annually) based on information such as rapid-cycle feedback loops, data and evaluation, broader research, etc. ▪ In particular, ensure that systems of periodic review and continuous improvement are in place for supports to lowest-performing schools/subgroups to best promote success and reinforce the need for learning systems. ▪ Promote systems of stakeholder engagement as part of initial plans (above) and cycles of continuous improvement. This could include diverse stakeholders such as other state leaders, local leaders, educators, parents, civil rights, business, etc. ▪ Consider how the state’s system of accountability can promote broader shifts toward learning systems and a culture of innovation, implementation, evaluation, and continuous improvement.
<p>ESSA Requirements</p> <p><i>Each state MUST...</i></p>	<ul style="list-style-type: none"> ▪ ESSA requires that states and districts periodically review and revise as appropriate their state and local plans under Title I. ESEA §§ 1111(a)(6)(A)(ii), 1112(a)(5). ▪ ESSA requires, for example, that plans for comprehensive supports and improvement for lowest-performing schools be periodically reviewed, that the state periodically review resource allocations for school improvement in schools receiving comprehensive and targeted supports, and that that more rigorous actions be taken if there is not sufficient improvement over time. See ESEA §(d)(1), (3). ▪ ESSA requires that state and local plans, as well as specific components of those plans related to assessment, accountability, and supports, be developed in consultation with an array of stakeholders. See, e.g., ESEA § 1111(a)(1)(A).
<p>Elevating Equity</p>	<ul style="list-style-type: none"> ▪ Establishing systems of periodic review and continuous improvement can help ensure that accountability and support strategies have greater impact over time, including on equity. ▪ More broadly, this can help promote the kinds of learning systems that are likely necessary for the system to achieve success for all kids. ▪ Establishing systems of stakeholder engagement can help elevate diverse voices and advance equity in both process and substance.
<p>Resources/ Examples</p>	<ul style="list-style-type: none"> ▪ <i>To come.</i>

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<p>Sample Deep-Dive Questions</p>	<ul style="list-style-type: none"> ▪ How can states establish systems of periodic review and continuous improvement that can help shift culture toward learning systems that can best advance college- and career-ready outcomes over time? ▪ What forms of evidence should those systems consider and on what cycles? ▪ How can states establish structures for productive, ongoing stakeholder engagement? What are the core strategies and models?
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CONNECTING YOUR ACCOUNTABILITY SYSTEM TO YOUR SCHOOL IMPROVEMENT SUPPORTS

Your state’s accountability system will signal to schools their broad areas of strength and weakness and give districts information about where major interventions in schools need to occur. The measures that are incorporated into your system will help you better understand what is working well and where a school may need additional support to continue to improve. In order to make this a mutually reinforcing system that ultimately leads to improvement, we anticipate that a state’s accountability team and school improvement team will work closely together. There are several issues in particular where collaboration is important:

- How are you identifying your lowest-performing schools (known as “comprehensive support and improvement schools” under the new law)? Will you use your state’s accountability index as part of one coherent system to identify these schools? Are there considerations that are relevant to this group of schools that may be used to complement the index (for example, graduation rates)?
- How will you determine that a school has exited the status of comprehensive support and improvement? How will that align with the reasons for which the school is identified?
- How will you incorporate identification of schools with the largest achievement gaps into your system (known as “targeted support and improvement schools” under the new law)? How will you determine the number of years after which such schools will instead be identified for comprehensive support and intervention?
- What is the interplay between the measures your state is using to make accountability determinations, measures you may be collecting to support you school improvement efforts, and your reporting strategy?

Please see CCSSO’s *School Improvement Support* outline for more discussion of this issue.

STRATEGY

As part of your effort to address these opportunities and responsibilities under ESSA, you and your team will be working across the SEA on a number of related strategies.

CROSS-CUTTING ACTIONS

Stakeholder Engagement

Your SEA will likely have an overall engagement strategy for working with stakeholders in the ESSA transition process. Within that, we anticipate there will be specific stakeholders who will be most relevant to the accountability system development and implementation. Constituency outreach *today* to inform key stakeholders about the new law related to accountability and to begin gathering ideas for implementation. Be sure to coordinate with the overall agency strategy before proceeding.

As you consider your key decision points, it may be helpful to reflect on the areas in which input would be most valuable. For example:

- Where do you have decision points for which it would be helpful to hear from stakeholders (for example, incorporation of additional indicators)?
- Where will there be opportunities for schools/districts to take unique approaches based on their respective contexts (for example, do schools/districts want to supplement the state accountability index with local indicators as part of its reporting)?

The process of gathering input also is an opportunity to identify partners who will help implement any changes and to communicate about the state's vision, mission, and implementation strategy. Questions to consider:

- What can you learn by asking school and district leaders questions about the effectiveness of your current system? What unintended consequences did school and district leaders encounter from current practice and how can that inform your system going forward? How can you work with these leaders to rectify that in a new system?
- Do you have an existing coalition, or do you need to build one? If you need to build one, have you considered all possible stakeholders? Examples include business, philanthropy, civil rights leaders, parents, teachers, school administrators and district administrators.
- How can you effectively engage civil rights leaders or groups representing traditionally underrepresented students, such as students with disabilities, English language learners, and communities of color?
- What will be the most effective process by which to engage stakeholders (working groups that meet multiple times, town hall discussions, etc.)?

Communications and Messaging

When a new law passes, teachers, parents, principals, superintendents, and legislators want to know, "What's changing today?" and "How will this impact the students?" ESSA has been branded as a law that provides tremendous state flexibility, but requirements still exist to which states and local districts must adhere. Both of these issues present a communications and messaging challenge that states should be proactive in discussing with key stakeholders. Questions to consider:

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- How are you sharing key messages within your SEA? Have you communicated the anticipated timeline for some of your major decisions (recognizing that some of that will be impacted by the federal regulations process)?
- How can you work with your communications team to identify what accountability-related messages need to be shared when and with whom?

Advocacy

As part of your overall ESSA transition strategy, your SEA will likely develop an advocacy strategy. As part of that effort, you will likely need to identify the accountability issues for which advocacy will be useful or necessary. Questions to consider:

- Does your state need to make changes to state policy, legislation, or regulation to implement ESSA pertaining to accountability?
- How does ESSA implementation timeline align with state legislative calendar or State Board meetings?
- Does your agency, or local school districts, need additional state resources to carry out the work for which advocacy will be necessary?
- What areas of the law require clarification from the U.S. Department of Education, and which should be clarified at the state level?

Data Use and Technology Supports

Data and technology enable the success of an SEA's policy priorities by supporting the delivery of services and applications. Information collected by state agencies shines a light on student outcomes and supports better decision making at all levels. As you consider changes you may want to make to your accountability system, it is important to address the implications of these changes on your data collection and reporting process from the start so you have the infrastructure in place to deliver on your accountability goals. Questions to consider:

- How do you want to display the data that is collected through your accountability system? How do you want different stakeholder groups to be able to access it? What impact does that have on your technology infrastructure?
- What technology supports do you need in place to deliver on any changes you want to make to your accountability system?
- Do you have data and information systems in place to track outcomes and measure success?

IMPLEMENTATION

Structure

As you consider your implementation strategy, your state's leadership team will need to discuss questions related to the structure of the state's ESSA transition team. For example, you will likely need to address:

- What staff, time and money will need to be dedicated to reflecting on and refining your accountability system?

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- Is there a point person leading your accountability work? Is there a team of people to support that point person?
- How will you balance handling immediate accountability needs with planning for phasing in new indicators or other longer-term work?
- What is your process for cross-agency coordination? How will you work across assessment, accountability, and school improvement supports in particular to ensure alignment?
- What additional resources might you need? Are there opportunities to repurpose some resources/staff?

Fiscal Considerations under ESSA

As part of those discussions, your state team also will likely discuss new federal funding opportunities, both in how you think differently about current funding streams and how you decide what new funding opportunities you want to pursue. ESSA makes many changes to federal fiscal rules, affecting all areas of the law. For more information on federal funding considerations under ESSA, CCSSO has developed a [Summary of Significant Spending and Fiscal Rules in the Every Student Succeeds Act⁸](#).

⁸ The Summary of Significant Spending and Fiscal Rules in the Every Student Succeeds Act is available online at http://www.ccsso.org/Resources/Programs/Every_Student_Succeeds_Act.html.