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Defining Evidence of Improvement in Student Performance:

A Step Toward Operationalizing Improvement Through State Accreditation

Doctorate of Education Leadership (Ed.L.D)

Capstone

Submitted by

Jake Dean Steel

To the Harvard Graduate School of Education in partial fulfillment of the requirements for the degree of Doctor of Education Leadership

May 2023

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> “In December of 1900, two months before he died, [Karl G. Maeser] was brought back to see once more the modest single-building campus on University Avenue he had built and loved and defended. He was helped up the stairs and into one of the classrooms where all of the students instinctively stood as he entered. Not a word was spoken. He looked at them slowly, then made his way to the chalkboard. With his bold script he wrote four statements on the board, turned, and walked out of [BYU] forever, closing as he did so perhaps one of the most distinguished educational lives [the] university has ever known…
>
> 1. [To love] God is the beginning of all wisdom.
> 2. This life is one great [homework] assignment . . . in the principles of immortality and eternal life.
> 3. Man grows only with his higher goals.
> 4. Never let anything impure enter here.”
>
> (Holland, 1987)

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Dedication

To my wife, Chanel, all of this would be meaningless without you.

To my mother, for your vision and your faith. For the years in which you defended my potential, even when I gave no evidence to the contrary. For your tenacity in ensuring the soft bigotry of low expectations never came home in my backpack.

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Acknowledgments

To my dad, Matt: Thank you for living a life worth emulating. Your love saved me.

To my son, McKay: You have the gift of leadership. The greatest leaders are the greatest followers.

To my son, Sam: Your fire is a gift, use it for good!

To my son, Wells: Your heart is pure, trust it.

To my daughter, Holland: You have the gift of courage, never underestimate your impact.

To my siblings: Shane, Brittany, Brooke, Lane, Ryan, and Tayler, because anything short of naming you would be plagiarism for not acknowledging your influence in my life.

To my in-laws: Pam, Kerry, Kerry Lee, Erin, Scott, Dana, Jacob, Alissa, Maleah, Ryan, John, Jaron, Mike, Sadie, Skyler, Ali, Kara, and Mary, you are saints in my eyes.

To my nieces and nephews: Kade, Bree, Nate, Louie, Sage, Preston, Wesley, Landon, Cooper, Gavin, Maely, Wallace, Emiline, Finn, Penny, Jessie, Kate, Calvin, Oaklie, Dylann, Evan, Logan, Ian, Mason, Ryan, Addison, Chloe, Rylee, Parker, Baylee, Paige, Teagan, Carson, and Quill. Faith in every footstep.

To my advisors, Marty and Carrie: Every moment of your time was an investment in me. For that, I am ever grateful.

To Maddie: Thank you for going above and beyond.

To the KSDE staff: Ben, Beth, Hayley, Jay, Jessica, John, Kelly, Kyle, Myron, Randy, Robyn, Sarah, Trey, and so many others**,** thank you for the opportunity to learn with and from you.

To C11: I filled you with pizza, and you filled me with love. Your influence on me and my family is the great gift of E.d.L.D.

To the Harvard faculty and community: Whatever you consider your life's work, thank you for your contribution to mine.

To Jeffrey R. Holland: No educator ever had a more life-changing influence on my soul.

Mr. Boyts: You will never know the impact you had on my life. Thank you for believing in me.

Mr. Krug: I am sorry.

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Abstract

The Kansas State Department of Education (KSDE) accredits all public schools in the state through the Kansas Education System of Accreditation (KESA). KESA is designed to evaluate at a system level, meaning school districts, a system of schools, or an independent school not affiliated with a school district. District leaders have been frustrated by the ambiguous nature of the indicators used to evaluate system performance. This ambiguity, lack of transparency, and inconsistency produced unnecessary friction and decreased practitioners' confidence in the accreditation process—what I call the external validity threat. Many within KSDE have likewise lost confidence in its value as a tool for accountability and system improvement—what I call the internal validity threat. This capstone draws on research on the positive and negative impacts of federal accountability to glean lessons and principles for a more objective and transparent approach to accreditation. It describes and analyzes my efforts to lead a working group developing indicators to define and operationalize evidence of improvement in student performance that are more credible and transparent for all stakeholders. I explain how I first developed a theory of action focused on reducing internal and external validity threats with the goal of better positioning accreditation as an effective accountability and system improvement tool. While I initially believed that my chosen inputs and outputs were the necessary connectors to fulfill this goal, I concluded that setting up a separate accountability system with touchpoints with accreditation would be more effective. While accountability can guide system improvement, it cannot effectively drive it. System improvement ultimately depends upon the support and services provided. Accountability systems are necessary for system improvement but never sufficient.

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Keywords: State Education Agency, Accreditation, Accountability, System Improvement, NCLB, ESSA

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Introduction

Kansas state law requires all public school systems to be accredited and the Kansas State Department of Education (KSDE) would indicate that the state's accreditation process is a blended model of accreditation and accountability. The process is designed to serve as a system improvement tool (KESA Guidance 2021-2022, 2022, p. 9). Accreditation and accountability are common throughout K-12 education. Accreditation typically takes place over several years and is based on an external validation process in which a school system proves it meets established standards. Accountability is typically an annual process focused on performance indicators, goals, and outcomes. Though not always the case, accreditation is most associated with inputs and accountability with outputs. Accreditation and accountability are not always seen as fundamentally or inherently different. The different approaches share similarities in that they are designed both to ensure educational quality meets certain standards and improve quality over time.

Accreditation and accountability come in many forms. Federal education law requires that states hold schools accountable for their outcomes but does not require accreditation. Some states have additional state accountability systems or requirements. About half of the states use some form of accreditation (Wixom, 2014). Some states require all schools or school systems be accredited directly by the state based on their own, regional, or national standards. Other states require accreditation but allow the process to be done by third-party organizations. Since 1998, about seven states have discontinued accreditation in favor of relying solely on accountability (Wixom, 2014).

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In recent years, KSDE has used its authority through KESA to change the accreditation status of several systems from “fully accredited” to “conditionally accredited,” a rating that implies a more probationary status. KSDE based these status changes on a variety of indicators that showed weak processes and/or results. System leaders have in turn expressed frustration with the ambiguity around the indicators KESA uses in the evaluation, as well as a lack of transparency and inconsistency in how the indicators are evaluated and incorporated into their overall rating and accreditation outcome. This ambiguity, lack of transparency, and inconsistency produced unnecessary friction and decreased the confidence of practitioners in the accreditation process—what I call through the paper an external validity threat—ultimately reducing the impact of KESA. To address this, under the direction of the Kansas Commissioner of Education, the Accreditation and Design team established working groups to improve the KESA process.

For my residency, I joined the accreditation team and was charged to lead a working group to define and operationalize one of the key constructs on which, under state regulations, accreditation decisions are based: evidence of improvement in student performance. The working group’s charge was to develop indicators of improvement that were more credible and transparent for all stakeholders. This capstone describes and analyzes my efforts to lead that group. I explain how I first developed a theory of action focused on reducing the validity threat internally and externally with the goal of better positioning accreditation as an effective accountability and system improvement tool. While I initially believed that my chosen inputs and outputs were the necessary connectors to fulfill this goal, I concluded that setting up a separate accountability system with touchpoints with accreditation would be more effective. While accountability can guide system improvement, it cannot effectively drive it. System

improvement ultimately depends upon the support and services provided. Accountability systems are necessary for system improvement but never sufficient.

Education in Kansas

Article 6 of the Kansas Constitution establishes three governmental entities in overseeing and providing public K-12 education in the state: The Legislature, the State Board of Education, and local boards of education. The State Board of Education consists of ten members each representing four contiguous senatorial districts. Members of the board are elected and serve overlapping four-year terms. One of the Boards responsibilities is over the states system of accreditation. The Board is also responsible for appointing a commissioner of Education who serves as the Executive Director, currently Dr. Randy Watson. Dr. Watson is the Chief Administrative Officer of the Kansas State Department of Education (*Office of the Commissioner*, n.d.). Dr. Watson was named Commissioner of Education by the Board in November 2014 and began his service in June 2015.

KSDE serves a variety of different public school systems. Kansas is home to 476,435 public school students throughout 286 unified school districts with 133 accredited private school systems (S. C. Neuenswander, 2021). Students in special education make up six percent (28,665) of the total student population, and English language learners make up nine percent (44,686). Kansas school districts vary widely in geographic size, enrollment, and socioeconomic status. The largest district geographically is Syracuse, USD 494, covering 992 square miles; the smallest district, Galena, USD 499, covers 14.5 square miles. Fifteen districts make up half the total enrollment. The largest is Wichita, USD 259, with 46,987 students, and the smallest, Healy, USD 468, has 42 students. The median Kansas district serves 543 students. Thirty-seven percent

of students across the state participate in free and reduced lunch. Kansas City Kansas, USD 500, has 76.8% of students receiving free lunch; Blue Valley, USD 229, also in the Kansas City metro area has 4.7% of students receiving free lunch. There are vast differences throughout Kansas school systems and with these differences has been the complexity of building an accreditation model for all.

Accreditation in Kansas

In the 2015-2016 school year, KSDE replaced the Quality Performance Accreditation model with the Kansas Education Systems Accreditation (KESA). The implementation of Adequate Yearly Progress under No Child Left Behind impacted accreditation enough that accreditation became nothing more than a compliance-oriented checklist. (J. Nobo, personal communication, August 22, 2022). KESA was designed to be different. It was intended to drive systemic improvement by using assurance checks to identify key challenges school systems face and their underlying causes.

The KESA accreditation criteria were introduced to create "a sustainable culture of improvement as evidenced by process and results" known as the growth cycle or continuous improvement process (KESA Guidance '21-22, 2022, p. 9). As part of completing the five year accreditation cycle, a system would be granted an accreditation rating of accredited, conditionally accredited, or not accredited. (*Kansas Administrative Regulations Definitions*, 2022).

The Kansas State Board of Education makes an accreditation determination for each system. The Board's determination comes after receiving an accreditation recommendation from the Accreditation Review Council. The Accreditation Review Council is a body of 18 education

professionals charged with reviewing and providing accreditation recommendations. The council reviews information collected over the five-year cycle, including from an Outside Visitation Team, as part of the accreditation determination. Feedback received throughout the accreditation cycle is captured through an authenticated application. It is through the application that systems are originally notified of the accreditation recommendation and given the option to accept or appeal the recommendation. Once accepted, or at the end of the appeals process, the accreditation recommendation is presented at a state board of education meeting and in turn is made public. There is no single public list or presentation that ranks or lists all conditionally accredited schools, however, there is a list provided to the state legislature annually.

Each of the accreditation ratings is defined in the Kansas Administrative Regulations (see Appendix I: The Kansas Administrative Regulations 91-31-31 – Accreditation Rating Definitions, for exact language). To be fully accredited, systems must show they comply with state and federal requirements known as "good standing," provide conclusive evidence of improvement in student performance (also called improvement in results) and provide conclusive evidence of a process of continuous improvement (improvement in the process). Systems may also receive conditional accreditation if they are in good standing but are only able to show an improvement process or results, but not both. Systems that are unable to show evidence of improvement in results and the process are not accredited (KESA Definitions, 2005).

The regulations define much of the process for an accreditation review but little to none of the substance. The *continuous improvement process*, *evidence*, *student performance*, and *improvement* are named but never defined. These definitions were left vague at least in part due to the complexities of reregulating and a desire to allow human judgment to play a role in

accreditation recommendations. However, the benefits of vagueness in the definitions were accompanied by disadvantages in the accreditation rating. Mystification around what evidence was used and to what extent process and results were weighted in determining the accreditation rating produced only quiet grumblings on the part of system leaders until the academic year 2019-2020.

That year, for the first time since KESA had been established, both the Accreditation Review Council in their accreditation recommendation and the State School Board in their affirmation of the recommendation assigned an accreditation status as conditionally accredited (see Appendix II: Number of Systems by Accreditation Ratings and Year (2017 – 2023). This unprecedented move in conditionally accrediting a system brought with it heightened awareness around the accreditation process leading to confusion and frustration because of the ambiguity in how the conditionally accredited rating was assigned. System leaders throughout Kansas have identified incoherence, unnecessary complexity, and ever-changing targets as problems with the accreditation cycle. As for the accreditation recommendation and determination, leaders complained that the Accreditation Review Council reviews the same data for each system but reviews and values that data inconsistently.

Problem of Practice:

Under the direction of the Kansas Commissioner of Education, Dr. Randy Watson, and the Director of the Accreditation and Design Office, Dr. Jay Scott, three working groups (i.e., compliance, process, and results) were established to improve the KESA process. Dr. Scott charged me, as a member of the accreditation team, to lead a working group around growth or improvement in student performance. Throughout the paper, I refer to this group as the results

working group or simply the working group. Our specific task was to define and operationalize "conclusive evidence of improvement in student performance" as written in the regulations (*Kansas Administrative Regulations Definitions*, 2022).

The Commissioner formed the working groups to clarify the accreditation process and accreditation ratings. Improving the process and results would improve KESA as a tool to drive systems change. I anticipated that my work was to increase the confidence of practitioners leading school systems. Their lack of confidence due to their view that the system was inconsistent and therefore unfair was an external threat to the validity of the system. My view was that KSDE could reduce that threat by creating more objectivity and transparency through defining improvement in student performance. It became apparent that if KSDE wanted systems to change, the concerns of internal stakeholders within the agency would need to be addressed first. In a series of interviews with agency staff held through July and August, it quickly became apparent that staff in other divisions of KSDE neither understood the accreditation process nor believed that it was objective, fair, and accurate. Ensuring that key agency representatives joined, co-created, and endorsed the outcomes of the working group would be more important than I had anticipated.

Defining Student Performance and Improvement

The overabundance of programs, priorities, and initiatives often created inconsistencies throughout KSDE due to their competing definitions and purposes. These inconsistencies and competing initiatives ran as deep as the purpose and focus of statutorily sanctioned responsibilities, such as the accreditation system. For example, because regulations do not define student performance, nor has KSDE explicitly defined student performance pertaining to the

accreditation system, it relies on definitions from other KSDE initiatives. Student performance is defined by different leaders in different ways. Through interviews with agency staff, I identified five common but different ways student performance is being defined throughout KSDE.

1. Postsecondary effectiveness rate: the percent of graduates who meet at least one of four requirements: (1) an industry certificate, (2) a postsecondary certificate, (3) a postsecondary degree, or (4) enrolled in postsecondary education in both the first and second year following high school graduation.
2. The two quantitative outcomes (of five total) for measuring progress towards the state board of education's vision: (1) high school graduation rates, and (2) postsecondary completion/attendance.
3. KSDE's definition of a successful Kansas High School Graduate, "A successful Kansas high school graduate has the academic preparation, cognitive preparation, technical skills, employability skills, and civic engagement to be successful in postsecondary education, in the attainment of an industry recognized certification or in the workforce, without the need for remediation" (*Board Goals and Outcomes*, n.d.).
4. The three quantitative measures (of eight total) of Kansas Can Star Recognition Program: (1) academically prepared for postsecondary, (2) high school graduation; and (3) postsecondary success (*Kansans Can Star Recognition Program: How to Apply*, n.d.).
5. Any single metric, or combinations of the quantitative metrics, found on the state accountability report (Appendix III: System State Accountability Report Example).

The accountability report, created by Kansas legislators wrote into statute a requirement for KSDE to develop a State Accountability Report. This report is a one-page report created yearly

for every public system. The report has become the go-to report for quantitative metrics as part of the accreditation review process. In my interviews, many individuals went so far as to say that a system's accreditation status has been largely determined, if not entirely, by this accountability report (*Accountability Report Contents*, 2019).

A second challenge our working group faced in defining evidence of improvement in student performance was KSDE's history of using the terms *growth* and *improvement* interchangeably. The accreditation rating definitions under the Kansas Administrative Regulations 91-31-31 use improvement and growth as interchanging indistinguishable terms (*Kansas Administrative Regulations Definitions*, 2022). However, growth and improvement are technical terms with different meanings. In their practitioners' guide to growth models, psychometricians Katherine Castellano and Andrew Ho distinguish between status, improvement, and growth. Understanding all three as ways to slice the data provides clarity around the technical differences between improvement and growth. They defined growth as "the academic performance of a student or group of students over two or more points in time"(Castellano & Ho, 2013, p.13). Status, in contrast, looks at the academic performance of a student or group of students at a single point in time and therefore does not support growth interpretations. Improvement, on the other hand, looks at changes in a performance indicator over two or more points in time but does so in situations where the students comprising the group do not stay the same year to year. That is why Castellano and Ho also refer to improvement as a cohort-to-cohort comparison. For example, looking at 3rd-grade data in 2021 and comparing it to 3rd-grade data in 2022 is an improvement metric because the comparison does not describe the same individuals or group of individuals. That means observed changes in

the data could have come from the changing composition of the cohort. Growth is more precise than improvement and ensures that when comparing data, the comparison of a student or groups of students does not vary.

There are nonetheless many ways to define and calculate growth. Castellano and Ho review seven different growth models, or calculations used to measure growth. The Data Quality Campaign's white paper on growth data identifies Kansas as one of two states in the country that does not technically use a growth measure in their federal accountability system, according to ESSA plans (*Growth Data: It Matters, and It's Complicated* 2019). (See Appendix IV: Growth Measures State by State, Findings From DQC's Analysis of State-Approved ESSA Plans). However, this wasn't always the case. KSDE once used a growth measure but has ceased using it in recent years due to the complexity of the measure.

In 2008, KSDE convened national experts in a technical advisory council for a two-day summit exploring growth models. The summit was to explore the purposes and benefits of an array of models. KSDE eventually adopted student growth percentiles as their growth model and used it as a component of its school accountability system for the duration of the No Child Left Behind (NCLB) era. Under the Elementary and Secondary Education Act (ESEA) flexibility renewal form, KSDE wrote into their request that student growth measures would be used in all Kansas educator evaluations starting in 2014-2015. KSDE wrote into the waivers that, if the data appeared stable, KSDE would not only report on but start projecting growth by 2016 (B. Neuenswander, 2015). In personal interviews with KSDE staff, it was indicated to me that by the time KSDE wrote the growth model into the waiver, they were already looking to the

reauthorization of ESEA and had already started disinvesting in the growth model due to the complexities of the measure.

Currently, system leaders and members of the Accreditation Review Council can reference almost any indicator showing change (or a lack thereof) for an unspecified amount of time to make an argument that a system has (or has not) shown improvement in student performance. This lack of specificity and high degree of subjectivity allows for such a vast amount of human judgment that the power of accreditation as a system improvement tool is lost. It is pivotal that the Kansas State Department of Education define evidence of improvement in student performance because only when student performance and improvement are objectively defined can the state's accreditation system achieve transparency, measurability, and ultimately credibility.

Review Of Knowledge for Action (RKA)

The Review of Knowledge for Action focuses primarily on accountability rather than accreditation. Though my project is under the Kansas Education System of Accreditation, the results working group's task of defining the performance measures used to assess student progress is more closely aligned with the role typically played by accountability systems.

The Review of Knowledge for Action has three major sections. The first draws on lessons learned from the federal No Child Left Behind Act (NCLB) and its successor, the Every Student Succeeds Act (ESSA), to highlight key considerations when defining, measuring, and evaluating student performance. Awareness of the history, choices, and implications in these areas will help the results working group better establish and measure the level of quality that can be expected from each local education agency. Section two discusses accountability systems,

their value, and their limitations. Section three briefly outlines Mark Moore's strategic triangle, a tool I will use to frame the project and analyze its results.

Defining Indicators of Student Performance and Improvement

Performance Indicators as Proxies for Student Performance

No Child Left Behind (NCLB) defined school quality by standardized test scores and graduation rates. The Every Student Succeeds Act (ESSA) brought on even more indicators to define student performance and identify school quality. Using limited indicators focused systems, but its narrow focus also narrowed the curriculum (Neill, 2003). ESSA, on the other hand, expanded student performance to encompass a broader view of success. ESSA brought on multiple indicators including proficiency on the annual assessment, graduation rates, progress of English language proficiency, and an indicator of school quality and student success. Student growth was brought forward as an indicator and left to the state's discretion if determined appropriate. Multiple indicators reduced the impact of high-stakes testing as it spread out evaluations. To ensure that all indicators were valued, ESSA required states to give weights to each indicator and that the academic indicators were given more weight than the school-quality indicator. There is power in focus by limiting the indicators, but with that same power comes a more narrowed vision of student and school success.

Transparency Around Student Performance

Arguably the greatest outcome of NCLB was transparency into the academic achievement of all students and ESSA built on that progress. Dr. Marty West, Academic Dean, and Professor of Education at the Harvard Graduate School of Education, when testifying before the U.S. Senate Committee on Health, Education, Labor, and Pensions in 2015 identified in his

written statement that the most important contribution of No Child Left Behind was the transparency it provided pertaining to all students and student subgroups (West, 2015). NCLB required schools to publicly share test results and other academic measures and to disaggregate those results by race, ethnicity, and class. This transparency provided essential information to the public about student performance, including achievement gaps. This transparency also provided the information necessary for more research and evaluation to better study educational best practices and even developed a new indicator of student performance (West, 2015).

Disaggregated student subgroup information is pivotal to best supporting every student. Researchers from the University of North Carolina at Chapel Hill found that "subgroup-specific accountability pressure has had positive effects for poor and minority students in lowest-achieving schools" (Lauen & Gaddis, 2012, p. 205). Other researchers out of Stanford University found no evidence that NCLB closed achievement gaps on average; but found that the provision of greater information about achievement gaps and subgroup-specific accountability pressure led to a more rapid narrowing of these gaps (Reardon et al., 2013, p.31). Transparency as a tool to draw attention and to focus educational resources has found itself to be paramount and a necessary part of accountability measures for systems.

Test-Based Accountability

Annual testing has shown to be a good metric in measuring learning and a strong predictor of later life outcomes. NCLB relied on annual testing having students tested once a year in grades three through eighth and once in high school in reading and math. ESSA continued the testing practice and expanded testing by requiring students to be tested in science three times, in elementary, middle, and high school. ESSA also provided funding for states to

audit their current testing to reduce unnecessary testing, provided funds to explore innovative tests centered on personalized and competency-based learning, and allowed states to use nationally recognized tests such as ACT and SAT (Understood, n.d.).

The advantages and disadvantages of test-based accountability are well researched. Annual testing has been shown to be a valid measure of student learning (West, 2015). Test scores are also backed by evidence that shows student scores on standardized tests are strongly predictive of later life outcomes (Hanushek & Woessmann, 2008). However, the negative impacts of testing include narrowing the curriculum (Hamilton et al., 2002) and the amount of time students spend taking standardized tests and in test preparation activities (Nelson, 2013). Also well researched–but only applied to proficiency-based accountability systems–is educational triage, the practice of identifying the "bubble children" who are closest to passing the test (Booher-Jennings, 2005). ESSA worked to reduce the unintended consequences of test-based accountability by adding multiple measures of student performance to reduce the weight of testing.

Despite these changes, test-based accountability has gathered political opponents on both sides of the political spectrum and must become a better tool for students, parents, and educators to maintain its value in these polarized times. Rick Hess explains that in recent years Democrats have become concerned that testing is a tool to beat up unions, advance privatization, bully urban communities, and undercut the call for more school spending. Republicans, he says, have grown leery of the standards and values promoted in these tests, are concerned about Washington's expanded role, and tests used as a tool to advance ideological agendas. (Hess, 2022).

Measuring Student Achievement

A major defect in the NCLB accountability system was its over-reliance on student performance levels—a status measure—as its sole indicator of school performance. Professor West states in his testimony that the most important flaw of NCLB was its "exclusive reliance on student performance levels as a measure of school performance" (West, 2015, p.5). Adequate Yearly Progress (AYP) required schools and systems to demonstrate progress on the goal of bringing 100% of students to academic proficiency by the 2013-14 school year (No Child Left Behind Act, 2001). Although states were allowed to choose their own tests and proficiency lines, it did not negate the reality that factors outside a school's control heavily influenced student achievement (2015). ESSA did not entirely resolve this problem, but it did make progress in reducing the negative impact of an exclusive reliance on student performance levels. Again, it did this by suggesting states use student growth in addition to proficiency levels and by requiring states to incorporate other performance indicators into school quality ratings.

Research supports ESSA's move to lessen its reliance on student achievement levels. A 2018 research paper released by the NWEA states that the "use of achievement by states biases the evaluation against schools who serve vulnerable populations with potentially adverse impacts on students most historically marginalized" (Hegedus, 2018, p.3). An unintended consequence of status-based accountability is often evaluating systems based on the students they serve rather than the quality of services these schools provide.

Measuring Student Growth

Growth measures have proven to be a better indicator than achievement measures of the impact schools have on student performance. Research has shown that a school poverty level has

a greater impact on student achievement than poverty at an individual student level (Tienken et al., 2017). One of the major recommendations coming out of the NWEA paper on the relationship between poverty and school performance was a recommendation to measure student growth over performance. Researchers found that growth is far more connected and aligned to school effectiveness compared to achievement (Haretos, 2005). The results of the NWEA research paper suggest that when school performance is evaluated by achievement measures the evaluation biases against schools that serve vulnerable populations. In turn, the most historically marginalized students are doubly punished. In fact, in their same study, researchers took the top and bottom 5% of achieving schools—out of the 1500 schools studied—and compared growth data. The study suggests that students grow the same amount in 46% of compared schools (Hegedus, 2018). The study concludes that growth is a far more accurate and fairer indicator of a school's impact than student achievement levels.

Though growth shows itself as a better metric in measuring the impact schools have on student learning, growth is not without its flaws. Growth as a single measure does not articulate if a student is performing at a proficient level. For example, a low-performing student could be in the 95th percentile of growth but still not making enough progress to reach proficiency in a reasonable timeframe. Growth becomes more valuable when compared to a standard. Though NCLB did not require growth, some states during the waiver authority years of NCLB began using growth-to-standard measures to identify students who are on a trajectory toward being proficient (Blank, 2010). The authorization of ESSA required proficiency rates and a second test-based measure, which highly encouraged states to use a growth metric as the state found appropriate. When states originally turned in their plans, all but two states—California and

Kansas—used a growth measure. Eight states used a growth-to-standard model, and of the eight, Idaho, and Connecticut used the growth-to-standard model as their only growth model. The other six states used growth-to-standard as one of at least two growth models. As can be seen in both research and practice, growth is an extremely valuable indicator, is complicated, and though valuable, it is not positioned as an indicator to be used in isolation.

There are lessons learned from both NCLB and ESSA around defining and measuring student performance. Federal law has shown that the technical aspects matter and have consequences. There are currently no "right" indicators but there are significant lessons learned and principles to follow as states take up the task of defining and measuring student performance. A key takeaway is aligning measures with purpose. If states want to measure how students are performing relative to standards, they should use status measures. However, if states are trying to evaluate school quality they should rely primarily on growth.

Determining How Improvement in Student Performance Will be Used and Measured

When it comes to accountability there are broad areas of agreement and of course some areas of disagreement throughout the sector. It is important when setting up an accountability system to understand the assumptions behind the system. ExcelinEd and the Center for American Progress are two organizations among many that have shared their view on the purpose and future value of accountability systems. ExcelinEd, the education transformation organization started by Former Governor Jeb Bush—a vocal proponent of strong state accountability systems—reports on their website that "accountability itself does not improve student outcomes, but the data it produces should inspire action that will improve student outcomes" (Hovanetz, n.d.). ExcelinEd goes on to say that the value of accountability systems comes from their two

major functions. First, accountability systems define and measure what matters. Second, accountability systems communicate results (Hovanetz, n.d.). Similarly, the Center for American Progress indicates that accountability anchors systems with goals and expectations, uses data to monitor the health of the system, and defines what quality inputs and processes look like (Jimenez & Sargrad, 2017). Both groups would agree that accountability defines and measures what matters.

Where a difference in philosophy begins to be seen is the accountability system's power to drive change. In a separate article, Governor Bush adds a third element to school accountability. Accountability, he says, "rewards and incentivizes success and provides interventions to support low-performing schools and reverse failure" (Bush, 2016). A blog post from ed100.org states that the problem with "holding someone 'accountable' for results through the threat of a penalty can be useful if it can motivate a better outcome. But what if motivation isn't the issue? For a penalty-based approach to work, those penalized have to know what to do different" (*7.8 Accountability*, n.d.). Reward and incentive-based accountability is built on the premise that schools can and know how to do more, they're just not. Justin Reich, an MIT researcher, illustrates this principle when addressing calls for accelerated learning coming out of the COVID-19 pandemic. He states, "Pundits call for 'accelerating learning' as if teachers have been doing 'unnecessarily slow' learning all these years, saving a box full of accelerated learning techniques behind a glass that says, 'Break in case of emergency'" (Reich, 2022).

The late Richard Elmore, and Susan Fuhrman both known for their work on accountability systems, identify through their research that teachers and administrators vary in their response to accountability systems. Elmore and Fuhrman write that capacity matters but not

enough is being done about it. They state, “Schools seem to be responding in ways that emphasize their existing strengths and weaknesses rather than in ways that challenge their capacities for self-improvement” (Elmore & Fuhrman, 2001). Their research goes on to state that low-capacity, low-performing systems respond to consequences not by changing internal systems and capacity but by doing the same thing they've been doing but trying to do it harder. Similarly, they show that high-capacity, high-performing systems respond very quickly to even low-stakes accountability such as publicity. Reward and incentive-based accountability systems do draw the attention of system-level leaders and cause those leaders to focus on the indicators being measured. However, the problem is that in response, systems try harder not differently. Elmore and Fuhrman conclude that what systems need is not to do the same thing differently, but to do different things. New things require new knowledge and new skills and to do that systems need help developing internal capacities. Elmore and Fuhrman identify the capacity building as the most difficult part and call for more resources and strategic uses of those resources as a requirement.

Accreditation and accountability indicators traditionally lack necessary elements to be used as an improvement tool. The Center for American Progress states that the weakness of ESSA accountability is that it paints a picture of results but the picture is incomplete because results can only tell the story of what outcomes were met but are unable to explain why systems met them (Jimenez & Sargrad, 2017). Accreditation systems are not fundamentally better off. At the simplest level, accreditation systems are often assurance checks rather than providers of services and support leaving them more inclined to improve compliance rather than performance.

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They can explain the inputs a system has, but the problem with input-based indicators is that they often lack the causal evidence linking the inputs they measure to important outputs.

Assurance checks are well positioned to guide school improvement efforts, but assurance checks alone are not school improvement efforts. Honoring the limitations of accountability will empower it to do more than unrealistically expecting it to do everything. As ExcelinEd states, accountability empowers individuals with data to facilitate continuous improvement, direct resources, and make informed decisions (Hovanetz, n.d.). As Richard Elmore and Susan Fuhrman clarified, “Accountability systems must be combined with support and services for teachers, administrators, and students, particularly those in high-poverty schools, to improve their capacity to teach and learn" (Elmore, 2003).

Cambell’s Law

One of the areas of caution when choosing performance indicators is the phenomenon known as Campbell’s law. Donald T. Campbell, a social psychologist and social science researcher wrote in his paper on Assessing the Impact of Planned Social Change that, “the more any quantitative social indicator is used for social decision-making, the more subject it will be to corruption pressures and the more apt it will be to distort and corrupt the social processes it is intended to monitor” (Campbell, 1979, p85). Campbell writes that, under normal teaching conditions, achievement tests are valuable indicators of general school achievement. However, he cautions that, when test scores become the goal, two things occur: the tests lose their value as an indicator and distort the educational process.

Campbell’s law is not restricted to testing but can be found with any quantitative metric that is chosen as an indicator to value or evaluate the teaching process (e.g. high school

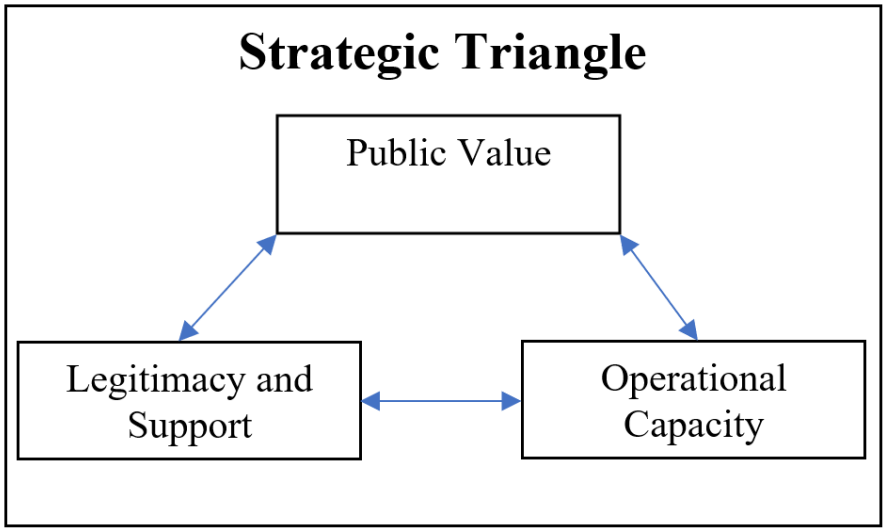
graduation or post-secondary effectiveness). Campbell's law has become a mantra for the anti-testing and accountability faction within education. But Kathleen Porter-Magee writes that Campbell's purpose was never to advocate to abandon the use of quantitative data. His purpose was to encourage the sector to protect against manipulation and distortion (Porter-Magee, 2013). Porter-Magee gives two suggestions about evaluation. First, the greater the consequences, the greater the need to diversify the indicators being measured. Second, the more accountability is attached to consequences, the greater the need to independently check the data being used. Campbell's law is a documented reality; however, it does not suggest that we resist evaluation. Rather, Campbell's law elevates the need to make sure evaluations are protected against manipulation and distortion.

Mark Moore's Strategic Triangle

Mark Moore's strategic triangle provides a framework for analyzing and improving the effectiveness of public policy. Moore argues in his book, "Creating Public Value: Strategic Management in Government" that producing public value in government agencies requires the integration of politics, substance, and administration (Moore, 1995). He lays out the strategic triangle framework to capture the essence of his argument. The three lenses are (1) public value, (2) legitimacy and support, also known as political sustainability, and (3) operational capacity (see Figure 1: Mark Moore's strategic triangle). He states in his book that the triangle can serve two purposes. The first is to focus managers on the three key questions they must answer. Second, the triangle lays out the key functions and tasks that leaders must do to define and realize their vision. I will be using the framework in the latter sense. I will be using it to explain

and analyze how my project unfolded and use the three lenses to discuss successes and shortcomings as I worked to achieve the vision of the project.

Figure 1: Mark Moore's strategic triangle



Theory of Action

IF I…

- Ensure key representatives join, participate, and endorse the work of the working group,
- Lead the working group in defining the indicator(s) that will make up student performance,
- Lead the working group in determining how improvement in student performance will be used,

THEN KSDE will…

- Better establish and measure the level of quality that can be expected from each local education system,
- Reduce ambiguity and increase transparency around accreditation ratings,

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- increase the confidence of internal stakeholders (divisions, and staff within KSDE) and external stakeholders (system leaders) in accreditation recommendations,

So That…

- The validity threat to KESA is minimized,
- Accreditation is better positioned as an effective accountability and system improvement tool.

Description, Evidence, And Analysis

Description – The What and How

The Kansas Commissioner of Education, Dr. Randy Watson, and his leadership team wanted to improve the process by which Kansas school systems received an accreditation rating. The accreditation rating was based on three broad areas: compliance with state and federal requirements, an established improvement process, and improvement in student performance (referred to by staff as 'results'). The "what" behind my role was clear: I would lead the results working group to define what constitutes "conclusive evidence of improvement in student performance" to improve the validity of the accreditation rating.

The working group consisted of 16 members including the Deputy Commissioner. Before the working group began, I worked with the Director of accreditation to determine who would need to be on the team. I also informed all the Directors in the Learning Services Division and gave them or a representative from their team a spot in the group. From the outset, subject experts were key members of the working group. The majority of members were selected from accreditation, Career Standards and Assessment Services, and the Information Technology teams. As the working group progressed, individuals were brought on who could speak to

specific aspects of the project. The working group was set up to meet twice monthly for 60-90 minutes, and meetings were used to discuss, deliberate, and come to a consensus on key project decisions.

The "how" of leading this group and defining improvement in student performance is what I knew would be the bulk of the work. It was one thing to write the technical rules and add objectivity to the system. It was another to design the system in a way that provided both clarity, and validity, and in turn, improved the Kansas Education System of Accreditation. The original goal was to have written guidance around the newly defined evidence of improvement in student performance. I am still aiming for the original goal, however, to date the project has progressed through only three phases: defining the problem, sector scan, and develop / model /and prototype. (See Table 1 for the phases, description, and timeline). Beyond the writing of this paper are my continued efforts to align, define, test, and write guidance around improvement in student performance.

Table 1: Phases of the Strategic Project

Phase	Description	Timeline
1	Defining the Problem	July – October 2022
2	Sector Scan	November – December 2022
3	Develop / Modeling / Prototype	December 2022 – March 2023

Phase 1: Defining the Problem | July – October 2022

The path to defining the problem started with learning how the accreditation system worked, reading regulations, consulting guidance developed for district school leaders, and collecting feedback from numerous interviews with current and former employees.

The interview process consisted of individually interviewing all six directors in the Division of Learning Services and separately interviewing three former directors who had departed from the agency within the last year. Interviews were also held with the entire accreditation team and with two former accreditation team members. All interviews were conducted in an hour-time block and included questions about vision, mission, culture, climate, accreditation, and accountability. Each interviewee was asked their opinion of the current state as well as direction over time in each of the areas. I also chose to do multiple in-depth interviews with one former and one current director of Accreditation as well as three individuals who could speak to the policies and initiatives at KSDE over at least the past twenty years. The interview process was constructed to develop an understanding—through differing viewpoints—of the history, changes, and current practices of Kansas accreditation.

Comments from the interviews coalesced around two central ideas. First, what I thought was an external validity threat began to appear as an internal validity threat as well. My assumption of the external validity threat as the primary concern was centered around my previous experiences interacting with accreditation systems as both a teacher and policy maker. Much of the process felt performative, and I assumed system leaders felt similar in Kansas. I was only on the job for days before I began to hear many employees within KSDE expressing their worry, concern, lack of understanding, indifference, and even hostility toward how the accreditation system was currently working. For example, there was frustration in the system on how decisions—both KSDE-wide as well as within KESA—were made. Interviewees did not always know when decisions changed, and it was common to hear interviewees be unable to articulate why the changes were made or by whom.

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Second, there was deep ambiguity about how the KESA process worked and what information was used in determining an accreditation status. Many practitioners in KSDE could not articulate how a system was accredited and what elements were used to determine accreditation status. It was the opinion of many interviewees that individuals leading school systems were also unable to articulate what elements were used to determine accreditation status. An example of the ambiguity within KESA was tension around how KSDE used the terms *growth* and *improvement*. At best, KSDE was using the terms interchangeably, and at worst KSDE would state it was measuring growth while it was measuring improvement. This could be seen in the definitions of accreditation status. Nowhere in the regulations is growth or improvement defined, but in the accreditation definitions they are interchangeably used. The definition of accredited and not accredited systems refer to demonstrating or not demonstrating "*improvement* in student performance" while conditionally accredited systems refers to "*growth* in student performance" (KESA Definitions, 2005).

Ambiguity was not the only concern within guidance and regulation. Reviewing accreditation regulations and associated guidance, I identified errors within the regulation that jeopardized the entire process. For example, the conditionally accredited definition states that the education system provides *neither* conclusive evidence of an improvement process nor results demonstrating growth in student performance. At the same time, the regulations state that not accredited systems fail to provide conclusive evidence of *either* process or results. In short, the language as currently written appears to require a higher bar for not accredited systems than for conditionally accredited systems. While it is possible that the language is legally correct but

written in a way that is not easily understood by practitioners, I believe the language discredits the foundation the accreditation status is built upon.

The two central ideas gleaned from interviews set the working group up in solving a two-part problem. Part 1 – The task: The original project task would remain, the working group needed to define evidence of improvement in student performance, as laid out in regulation. Part 2 – Addressing the validity threat by reducing ambiguity: No less important was the role of the working group to reduce the validity threat to the entire KESA process. The internal validity threat could be resolved through the working group by inviting representation from every division. This would allow all parts of KSDE to be included in future creations and designs. Traction on the external validity threat would be made after internal threats, including the ambiguity about how KESA works, were addressed and resolved. If the working group was going to improve the validity of the accreditation rating, then they needed to remove ambiguity throughout the system.

I believed significant progress would be made by a properly functioning working group operating on the principle of democratic consensus. Establishing a representative working group operating transparently through democratic consensus would pave the way to reducing ambiguity and therefore reducing the internal validity threat. By doing that the group could tackle the more technical aspects of the project by identifying the domain that would be considered under student performance and then what improvement and/or growth meant when looking at those indicators. It was this process that led me in developing the problem of practice and theory of action.

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Phase 2: Sector Scan | November – December 2022

After defining the problem, it was paramount to scan the sector to identify what has been and is currently being done in defining and measuring student performance. I undertook the task of looking at Consolidated State Plans under the Every Student Succeeds Act to determine how states, through their accountability systems, were valuing and evaluating student performance.

Through the sector scan, I tracked how each state used performance indicators and weights in elementary/middle and high schools. (See Appendix V: Academic Achievement and Growth Weights by State). I used this information to identify commonalities both in performance indicators as well as growth indicators to determine both common and best practices throughout the country (Appendix VI: Consolidated State Plan Indicators Grouped by Commonality).

Through the sector scan and conversations in the working group, it became apparent that student performance would be defined in one of four ways:

- First, KSDE could align our student performance definition with how other states define their domain of student performance as identified in each state's ESSA plan with an accompanied weighting system.
- Second, rather than redefining student performance, KSDE could keep the domain as it was currently being operationalized (academic performance as measured by the state tests, graduation, and post-secondary effectiveness) but sharpen the objectivity and transparency of the business rules.
- Third, KSDE could define student performance through the materials already produced by the Kansas State School Board including the board's vision, mission, and definition of

a successful high school graduate. Doing this would still require a fair amount of alignment and development of new metrics to ensure student performance did not feel like a randomly compiled group of metrics.

- Fourth, student performance could be defined by a single metric (e.g., academic achievement or a growth measure).

Through the working group's deliberations, it became clear that defining student performance as measured by the state summative test was the next move. The idea of defining student performance by a single metric was not an original idea of the working group. Many of the members of the working group, including myself, were also members of the school improvement working group led by Deputy Commissioner Ben Proctor, and all that group's efforts were pointed to setting new standards, processes, and supports built around academic performance. This was due to a plethora of factors including internal data that strongly associated academic performance with post-secondary effectiveness, declining NAEP scores, and an increased number of requests and pressure from Kansas legislators. After deliberation, the results working group came to a unanimous decision that student performance for purposes related to the Kansas Education System of Accreditation would mean academic performance as measured by the state summative test. This decision is counter to best practices identified in the Review of Knowledge for Action as it relies too much on one measure. Leadership in KSDE is aware of this and more work will be done in the improvement working group to rectify the tension in student performance and the indicators used to measure and evaluate it. I see the unanimous decision, not as the final state of KESA but as a placeholder and signal through KSDE of the work being done and work yet required of the agency.

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Phase 3: Develop / Model / Prototype (ideate/experiment) | December 2022

Defining the problem and determining, as a working group, that we were going to focus on academic performance carved out a path for objective measurement. Regulations required KSDE to measure improvement, but we agreed as a group that we wanted to measure growth. I pushed hard and was very transparent in formal and informal meetings, as well as conversations with the commissioner, to encourage KSDE to report growth in two ways: (1) how systems move all students and separately (2) how systems are moving the lowest performing 25% of students in their systems in ELA and in math. Focusing on the lowest 25% of students allows systems to focus on students with the most needs, and not be bound by n-size reporting limitations as could be the case if the system were to consider student subgroups defined based on demographic characteristics. To date, it seems KSDE is willing to take this recommendation.

Using the original accountability sector scan work, I developed models for consideration. A major hurdle in measuring growth was that the Kansas state tests through the Kansas Assessment Program (KAP) were not vertically aligned, which significantly hindered how growth could be measured from year to year. My efforts and other efforts throughout the agency landed at the right place and time. The state test was up for a contract renewal and the Deputy Commissioner in agreement with the Director of Career, Standards, and Assessments Services agreed to require vertical alignment from the new test.

In consultation with the Research and Evaluation team, I came up with potential options/tools the working group could use to best evaluate and measure academic performance: a weighted achievement model, a transition table, and a recommendation to identify a floor in academic performance by which systems would be measured against. I recognized from the

outset that our recommendations would significantly improve the objectivity KESA was requiring of systems. I also was aware that two of the proposals–weighted achievement and the academic performance floor–were focused on status not improvement and therefore fell short of the regulatory requirements. KESA would have to eventually account for this and identify if system improvement would be done in both process and results. Regardless of these obstacles, I moved forward with the three options.

Option 1 – Weighted achievement: The weighted achievement model was adapted from the academic achievement indicator used by Arkansas on their consolidated state plan (Key, 2017). Weighted achievement assigns varying point values to each of the four achievement levels. The purpose was to minimize the likelihood of a system focusing on students clustered around proficiency cut points and incentivize systems to invest in moving students from lower to higher performance levels. Again, this model did not measure growth or improvement when looking at a single year but could measure improvement when looking at multiple years. The value in the weighted achievement model was to better capture the full distribution of student performance. Many in the working group felt this was overbuilding the model and it never received much traction.

Option 2 – The transition table: The data behind the transition table is also generated from state exams. What makes the transition table a growth metric is that it links prior year and current year achievement data at the level of the individual student. The table takes the four performance levels as reported by the state exam and divides each level in half, creating eight distinct levels, what are called Academic Performance Index levels. The table was originally developed by the research and evaluation team who gave me access to the data allowing me to

develop, adapt, and format it for potential purposes of using it for accreditation. The transition table was the best way I was able to show improvement in student performance. The transition table began to pick up a lot of traction around KSDE, so I worked with a system software staff consultant to build out a working model that would allow KSDE to input any system's data into the table and to see that data at an individual student level. This allowed me to start modeling and working through scenarios in which I could start evaluating systems based on how well they were moving students academically (Figure 2: KSDE Transition Table).

Figure 2: KSDE Transition Table

API				1	2	3	4	5	6	7	8			
			2021 Students	2022 4th Grade ELA Students								2021 -2022 Change		
				Level 1		Level 2		Level 3		Level 4				
				Level 1 Bottom	Level 1 Top	Level 2 Bottom	Level 2 Top	Level 3 Bottom	Level 3 Top	Level 4 Bottom	Level 4 Top	% Decrease	% Maintain	% Increase
1	Level 1	Level 1 Bottom	14	0	11	2	1	0	0	0	0	0	0	14
			2.5%	0.0%	78.6%	14.3%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
2		Level 1 Top	141	5	51	49	26	7	2	1	0	5	51	85
			25.3%	3.5%	36.2%	34.8%	18.4%	5.0%	1.4%	0.7%	0.0%	3.5%	36.2%	60.3%
3	Level 2	Level 2 Bottom	66	0	6	26	24	8	2	0	0	6	26	34
			11.8%	0.0%	9.1%	39.4%	36.4%	12.1%	3.0%	0.0%	0.0%	9.1%	39.4%	51.5%
4		Level 2 Top	62	0	6	10	14	19	12	0	1	16	14	32
			11.1%	0.0%	9.7%	16.1%	22.6%	30.6%	19.4%	0.0%	1.6%	25.8%	22.6%	51.6%
5	Level 3	Level 3 Bottom	68	0	1	7	15	27	18	0	0	23	27	18
			12.2%	0.0%	1.5%	10.3%	22.1%	39.7%	26.5%	0.0%	0.0%	33.8%	39.7%	26.5%
6		Level 3 Top	92	0	0	1	6	29	40	14	2	36	40	16
			16.5%	0.0%	0.0%	1.1%	6.5%	31.5%	43.5%	15.2%	2.2%	39.1%	43.5%	17.4%
7	Level 4	Level 4 Bottom	88	0	0	0	2	9	34	30	13	45	30	13
			15.8%	0.0%	0.0%	0.0%	2.3%	10.2%	38.6%	34.1%	14.8%	51.1%	34.1%	14.8%
8		Level 4 Top	27	0	0	0	1	1	0	12	13	14	13	0
			4.8%	0.0%	0.0%	0.0%	3.7%	3.7%	0.0%	44.4%	48.1%	51.9%	48.1%	0.0%
		2022 Students	558	5	75	95	89	100	108	57	29	145	201	212
				0.9%	13.4%	17.0%	15.9%	17.9%	19.4%	10.2%	5.2%	26.0%	36.0%	38.0%

The transition table would be used to report and potentially evaluate systems on the percentage of students who demonstrated a learning gain. The rules around demonstrated learning gains are being presented to the results working group for consideration. The rules are adapted from a model used by the Florida Department of Education (Diaz, 2022). A student signifies learning gains in one of two ways:

- Rule 1: Advance in Performance Level – Any student who advances in at least one performance level

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- Rule 2: Maintain Performance in Academic Performance Index level 8 – Any student who maintains a score at Academic Performance Index level 8 (Maintains in upper-performance level 4)

Although I am in the process of building out the business rules with the transition table I am also looking into other options to account for growth as KSDE considers bringing on a traditional growth model. A traditional growth model may allow KSDE to simply report learning gains by an improved scale score and therefore the transition table as an evaluation tool may lose its value.

Option 3 – Setting a floor: One of the areas of friction I continued to bump up against when trying to evaluate student performance was the absence of an objective standard. KSDE did not lack objective metrics but KESA did. The other objective metrics oftentimes felt in the way. For example, ESSA required the state to set a proficiency line to evaluate individual student achievement (performance level three or above), but that line was about students, not systems. KSDE had also set a goal for the state to have 75% of students in performance level 3&4. Individuals knew about these metrics but did not know to the degree they were used in the accreditation process.

An analogy I heard through multiple interviews was a comparison between education accreditation and food truck permits. The idea centered on the role of permitting, not as a tool to evaluate the best food truck in town, but to certify the truck had met the minimum health and safety requirements for operation. I enacted that analogy and began running reports to better identify a reasonable minimum standard pertaining to academic performance. This, too, began to receive a lot of momentum in KSDE, so I developed a scale to facilitate minimum academic

requirement conversations. In modeling conversations, the working group began to discuss the standard of evidence necessary to ensure that systems below the floor were not there just by chance. Relying on Carrie Conaway and Dan Goldhaber's work (Conaway & Goldhaber, 2019) and in conversation with Carrie, the working group determined to take the data at face value, meaning we did not apply a 95% confidence standard.

I developed a minimum standard for academic performance based on the percentage of students in performance level 1. I recommended KSDE use this standard as an academic floor. This would mean that KSDE would set a minimum threshold for an acceptable number of students allowed in the performance level. Any system that has more students than allowed by the academic floor would automatically be conditionally accredited rather than fully accredited. The working group decided that the academic floor should be based on state test scores pertaining to ELA and math only. Setting the academic floor had significant implications. If KSDE set an academic floor at 50% then the state would be conditionally accrediting around 19 systems. Setting the floor at 40% would conditionally accredit 72 systems, and setting the floor at 30% would conditionally accredit 193 systems, or about 63% of districts in Kansas. Two difficulties arose when setting the academic floor. The first was articulating the why behind where the line was drawn. The second was recognizing the real and perceived equity concerns elevated as this tool began to single out districts with common characteristics.

I gave three options for articulating the why behind the level of the academic floor. First, and most simply, 50% was a very low, but logical floor and would make sense to superintendents. I believed that few if any individuals would try to argue that having more than half of a system's students in the lowest performance level was acceptable. Second, the floor

would be based on KSDE's capacity to provide support and services. I anticipated this recommendation would be a tough sell because choosing it would require the most disruption to KESA and the most time. I believed to do this right, the work of identifying the supports, services, and capacity of KSDE would have to be an agency-wide effort, not just a KESA effort. At a minimum, I anticipated the work behind this would take at least a year before KSDE could identify the floor. Third, KSDE could identify through modeling the max number of students that would be in performance level 1, based on how a district performing relatively similar to the state would perform. This modeling was done using 2022 state assessment data. The modeling used the observed mean and standard deviation from the 2022 data, randomly drew 30 students by grade, categorized the results into performance levels, and tallied the number of students in performance level 1. This process was simulated repeatedly until a reasonable number of simulations provided KSDE with evidence to set the academic floor. The modeling identified that a district performing relatively similarly to the state would have no more than 40% of its students in performance level 1. This modeling was more precise than choosing a number that would "make sense" to the public, however, it had three major weaknesses. First, the modeling assumes that the observed performance of a district will be a perfectly normal curve. Second, the normal functioning district is built on 2022 data. When using 2015 data, a number closer to 30% of students in performance level 1 was where a district performing relatively similar to the state would be. Third, and not an exclusive weakness to this model but a weakness in setting a floor was the reality that a district performing relatively similar to the state could be KSDE condoning "relatively similar" as a synonym for an appropriate or acceptable percentage of students in performance level one.

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My goal before the end of my residency is to have a working model, business rules, and potential guidance written around an academic floor and use the transition table to account for and potentially evaluate growth in student performance. I have continued to use the working group as I build out the best models to account for and evaluate systems. To date, it is likely the team will extend their work for another year and, in the meantime, do major redesigns around the process and results side of KESA.

Evidence to Date

This section showcases the collected evidence to date measuring the progress toward the theory of action identified in the strategic project. A succinct list displaying the evidence and artifacts organized by the components in the theory of action is presented in Appendix VII: Evidence of and Progress Made Toward the Theory of Action (as of March 2023).

Below the evidence and artifacts will be divided into three major sections: inputs-what happened, outputs-what changed, and outcomes-impact felt.

Inputs: What Happened

I made significant progress on the first condition of my theory of action: to ensure key representatives participated, co-created, and endorsed the work of the group. I invited key stakeholders, including division directors, to join the working group. I ran the group more like a board and focused on co-creation and unanimity in working group decisions. A division director in KSDE articulated that most groups were gathered to be informed of decisions, this group was notably different as it gathered to co-create and make decisions together.

The second condition of my theory of action was accomplished: the working group defined the data source that would make up student performance. As a starting point for the

working group, I created a federal accountability tracker. Through the tracker, I disaggregated every consolidated state plan and presented the information to the working group around performance indicators, indicator weights, and evidence by which indicators were assessed (See Appendix VIII: Snapshot of Country-Wide Indicators). The group in coordination with the school improvement working group unanimously agreed that student performance would be academic achievement as measured by the state exams.

The third condition of my theory of action: determining how improvement in student performance would be used and measured was the most incomplete portion of the project. The project developed in a way where the academic floor began to be seen as assurances and standards. To date, the policy is not being written to require systems to show that they are systematically improving in student performance—pertaining to these areas. Instead, the improvement required of systems is to show their status is above the assigned floor.

The transition table is currently equipped to evaluate improvement in student performance. Using the transition table, I have developed a way to show the percentage of students demonstrating a learning gain. This tool has been used by the Commissioner and Deputy Commissioner and shared with a few internal and external groups. The table was designed to assist superintendents in analyzing student data, and the feedback I have received is that it is easy to understand and helpful in making decisions. I am currently leading the continued development of this tool to be used statewide. There is great excitement around this tool, including for potential uses beyond the accreditation process. As a result, the rules and connectivity with accreditation have yet to be determined. It is worth noting that the excitement around the tool exists when it is seen as a tool, but that same excitement evaporates the moment

a conversation begins on using the tool for evaluative purposes. (See Figure 2: KSDE Transition Table).

I made significant progress in reducing ambiguity and increasing transparency, and I even made progress in showing a system's ability to show improved student performance as demonstrated by a learning gain. Yet my efforts have fallen short in determining how to evaluate improvement in student performance outside of measuring a floor. This is problematic because the regulations only focus on improvement, and therefore, until I find a way for KESA to evaluate improvement, the current plans do not meet the regulatory requirements.

Outputs: What Changed

The first two major changes I wanted to see as a result of my work were to: first, better establish and measure the level of quality that can be expected from each local education agency; and second, reduce the ambiguity and increase transparency around accreditation ratings. I made the most progress on this second goal. Establishing academic achievement as student performance removed the ambiguity around what KSDE was measuring. In better establishing and measuring the level of quality and to increase transparency around ratings the working group determined that accreditation could establish a minimum standard by which if a system did not meet, they would be conditionally accredited. I presented to the working group a document of information to help set the minimum level in student performance, see Appendix IX: Cut Score Face sheet, a Table to Help Set a Floor Based on KSDE Capacity. The future work is ensuring the right level is set.

The third change I wanted to see as a result of the theory of action was to: increase the confidence of internal stakeholders (divisions and staff within KSDE) and external stakeholders

(system leaders) in accreditation recommendations. I made some progress with the former but not the latter. The evidence by which I saw changes within KSDE began through my co-creation efforts. Two major pieces of the work, the transition table and the new theory on setting a minimum standard, were developed by group members, and elevated through the working group. The more individuals saw their fingerprints on the work, the more they began to believe in what the working group was doing.

Other major changes are beginning to take place within KSDE in part due to the work of our group. Members of our working group have educated many throughout KSDE on the difference between improvement and growth. I have also joined in fostering the environment to begin to measure and recognize growth. The recommendation has been made and is being considered to begin to develop the plan for KSDE to bring on a true growth model. In that same vein, robust conversations have centered around the purpose, differences, and limitations between accreditation and accountability.

Outcomes: Impact Felt

One of the desired outcomes identified in my theory of action is to: reduce the validity threat to KESA. To date, very little has changed. However, I have made progress in the preliminary work necessary to reduce the validity threat. Part of this has been rewriting regulations. I submitted regulation changes to the office of general counsel at KSDE that would correct fundamental errors that jeopardized the entire system. As written the regulations were too flawed to serve as the basis for accreditation to operate legitimately. I also submitted language to reduce as well as reword definitions for clarity. The changes were submitted to KSDEs General Council and are on a path to go to the state school board and secretary of state. These changes

will help to ensure that KESA is on legitimate legal grounds. As important as these changes are, I do not feel they will significantly reduce the validity threat to KESA on their own. For that, I believe KESA in its entirety needs to be redesigned and reregulated.

Second, I joined the efforts of the deputy commissioner and school improvement group to begin to identify and align support services. I have joined my voice in recommending that accreditation be paused while KSDE rebuilds the system for at least a year. The goal of the build year is to make sure accreditation recommendations are in line with other programs, services, and supports provided by KSDE and to ensure that KESA plays a major role in helping KSDE identify needs and likewise align resources. This recommendation is likely to happen to some extent. I believe positioning KESA as a tool to assign support and services can be a major factor in reducing threats to its validity and in turn having a greater impact within and outside KSDE.

Finally, an outcome in the theory of action that I wanted to see was for accreditation to be better positioned as an effective accountability and system improvement tool. If "effective" means a more transparent, measurable, and aligned tool, then I have evidence that KESA is on its way to becoming a more effective accountability tool. These changes include defining student performance, identifying a floor, and developing a tool to show learning gains. However, if effective means an effective school improvement tool then the project has fallen short pertaining to this outcome.

Analysis

The Review of Knowledge for Action (RKA) focused on information and lessons learned that supported the technical aspects of understanding and evaluating accountability indicators and systems. This information was necessary for designing and developing accountability

measures that would add clarity, validity, and objectivity to the accreditation system. However, this literature is not sufficient for understanding how the project proceeded in its entirety due to factors beyond technical components. In analyzing and reflecting on leadership, it is as important to reflect on the process as it is on the outcomes. For this reason, I will review successes, challenges, and next steps through a framework to guide and analyze the leadership moves throughout the project.

The framework used is Mark Moore's Strategic Triangle (Moore, 1995). The strategic triangle framework ascribes the success—or value creation—of an initiative to three interrelated conditions:

1. Public Value: The proposed initiative has a clear value to the public
2. Legitimacy and Support (political sustainability): The initiative has the necessary support from the community and authorizing environments
3. Operational Capacity: The Kansas State Department of Education has the operational capacity to implement the initiative as proposed

Public Value:

The theory of action in its entirety was designed to develop and define indicators to operationalize evidence of improvement in student performance in a more credible, measurable, and transparent manner for all stakeholders. Both the product and the process are a public value. The product, like the external validity threat and external stakeholders, increases transparency and objectivity and in return is more understandable, fair, and predictable. The process has given KSDE staff a productive way to disagree with the current state of the system, not by criticizing, but by joining in the creative process. When the project lives up to its full potential, there are

touch points of value for all stakeholders within education. Below, I will specifically address major stakeholders.

There is a significant public value for school system leaders centered around the outcome of reducing ambiguity and increasing transparency around accreditation ratings. I am cautiously optimistic that superintendents will recognize the change in KSDE's operations. Though I do not anticipate full harmony in supporting KSDE on how student performance was defined, I do anticipate that they will value the objectivity which will allow them to focus their energy and efforts. I have clarified the indicators that will be used to evaluate systems, have identified cut points that are objective, measurable, and predictable, and have created a transition table that will aid system leaders in monitoring and strategizing to better improve student performance. These supports are in line with what superintendents are indicating they want and need. A 2022 survey given by the Data Quality Campaign and the School Superintendents Association shows 94% of superintendents trust that state assessments accurately reflect their school's performance. At the same time, 99% believe that the state could do more in helping the data become a tool to assist them in acting on the information given (Felton, 2022). Though there is current public value in what the working group has done, if the superintendents feel these measures are set up to shame or blame them, our work will quickly be turned on its head. Two of the major deficiencies in the project to date is first, my inability to write the rules around how the level-based performance standards and transition table will interact with each other in an evaluative way to determine a system's accreditation rating. Second, the tension KSDE will face due to the initial choice in solely defining student performance as academic achievement, a decision that is counter with research and best practices of not over relying on a single measure as discussed in the RKA. The

Kansas State Department of Education will be required to continue investing and building out resources, like the transition table, to maintain and grow the public value for superintendents.

As part of improving public value, KSDE will now better provide the information asked of them by state legislators. Legislators for years have felt that their increased funding in public education was having little to no evidence of impact. This is due, in part, because while legislators were wanting to see improvements in state test results, KSDE, along with national K-12 education in general, was moving further away from test results by relying on and evaluating other indicators. This was the state of the organization when I arrived. Within nine months, KSDE has gone from rarely acknowledging the state exam to this moment where the exam is becoming the primary indicator for evaluating academic performance. This shift has occurred due to the following reasons. First, there is a national conversation prodded by recent NAEP test results that have added a focus on academic achievement (Rotherham, 2022). Second, I believe our state results are at a point where KSDE can no longer continue to operate without specifically addressing them. Third, new staff have been onboarded and have drawn light to the need and responsibility to focus on academic achievement. Fourth, I have provided a way for KSDE to become objective and transparent in measuring and evaluating academic achievement without overusing its conditional accreditation authority. In the short-term, state legislators will be thrilled to have state exams more objectively and transparently account for student performance. In the long term, the public value for state legislators will have a short shelf life if systems are not improving student performance.

The public value for parents has not been developed yet, but I believe it is not based solely on the information provided to them but on how the state communicates and engages

parents in using the information. Populace, a Massachusetts-based think tank, released a survey showing changes in public perception and priority in education. An overall takeaway from the study is that parents are not a homogenous group and that their needs and wants are subject to change quickly. Of the 57 priority indicators that participants were asked to rank, students being evaluated by success on standardized tests ranked overall 49th out of 57 priority indicators. However, Asian parents ranked the indicator as the second most important while black and Hispanic parents ranked the indicator last (57th) (*Populace Insights: Purpose of Education Index*, 2023). Another takeaway is that respondents ranked the purpose of education as preparing students to enroll in a college or university as the 47th most important role in 2022, as opposed to 10th in 2019, a dramatic 37-point swing. These reasons illustrate some complexities of satisfying parents' opinions. It will be crucial for KSDE to build out a way to help parents—and all stakeholders—better understand why the information shared is valid and can be used to support student learning.

There is a necessary internal public value that must be felt throughout KSDE, and I believe it's currently in its infancy. It is paramount that teams within the Division of Learning Services beyond the KESA team feel the public value of accreditation and its rules to ensure the legitimacy and sustainability of the project. I have been open throughout the process that I believe one of the most important things this project can do is to use the process to reduce the internal validity threat. To date, the process has provided members of the working group as well as other staff the ability to share their opinions, and especially their disagreements, in a way that adds productive value as KSDE creates the new system. For public value to continue internally, the openness and feedback loops created through the system must remain in force. Also, KSDE

must also continue to push for and align systems. Public value is felt through the project when people believe in what the tool is doing and recognize that the process is aligning and unifying KSDE, which in turn improves educational services throughout the state.

Through the project, I developed and defined student performance with indicators that are measurable and transparent. I am currently keeping those measures ready to use when needed, but the work will be shifting to a more extensive rebuild and alignment with other KSDE initiatives. The working group has done great preparatory work in establishing significant public value for system leaders and legislators. Public value has been created for internal staff, but that value is dependent on KSDE's continued efforts in engaging staff. As KSDE begins to more extensively rebuild KESA–in alignment with other agency efforts–and as they eventually move the work to an external focus, they will need to build out the public value for parents. Overall, the project's public value is well defined, and maintaining that value will be heavily dependent on KSDE's continuous investment to foster the project's legitimacy and support.

Legitimacy and Support (political sustainability):

Part of the theory of action was built on the premise that the authorizing environment necessary to see this project to fruition would be based on ensuring that key representatives joined, participated, and endorsed the working group. In turn, by doing so, I predicted that I could increase the confidence of internal and external stakeholders in accreditation recommendations. A new version of KESA, no matter how well-built, would fail if it did not have the right backing. The right backing would come, I believed, not by just having the best idea, but by engaging individuals in the work so KSDE staff all felt it was "our" idea, not

"theirs." In working with the group, I had a few deliberate actions that helped ensure the internal political sustainability was backing the project.

I began to make sure that I knew where people were, and likewise, they knew where I was before we entered the room. I made a mistake early on when I introduced a completely new idea for discussion to the whole group. Though the idea was only for discussion, it was clear that people were not prepared to discuss or react to anything they knew little to nothing about. This played out in silence and the aggravation of working group members. I made it an operating principle moving forward to ensure that nothing would be sprung on the working group. Living up to that operating principle consisted of me working a lot of back channels.

I met with individuals privately and often—working the back channels—and this was key to the success of the project. In previous positions, I had seen back-channeling only through its negative light and so was reluctant to embrace it. I took a different approach this year, embracing individual conversations and allowing myself to monitor and forecast organizational and political landscapes on a micro and macro level. This was done in part by monitoring the individual status of members of the working group. I used these individual spaces to ensure that what the working group agreed on collectively was reflective of how people were feeling privately. I also used these spaces as a way to test and grow new ideas and ways of thinking.

I ran our working group like a Board focusing my energy on reading the room as individuals surfaced concerns, questions, thoughts, and proposals. The working group met bimonthly, and, in these meetings, my agendas were centered around topics and ideas. I often tried to take a back seat in discussions, using my role more as a convener to collect, gather, and deliberate on information rather than as a presenter of information. The importance of language

was very important to me, and I constantly monitored it. I could tell when the conversation and proposals began to lose support by how people would speak. In some ways, it became evident when members felt they were no longer aligned with the ideas of the collective group. For example, you would hear people move away from the use of “we” and begin to say “you guys could” when referring to the accreditation team. I took this small signal and others like it as small endorsements or disavowments of the state of the project and used those signals to make sure the project was moving in a direction that increased the confidence of internal stakeholders.

In working with the group, I took a few actions that hindered the internal political sustainability of the project. First, I sometimes operated in a way that assumed all group members were subject experts in every area. I too often assumed that my learning was group learning and unintentionally put unnecessary weight on group members. I could have done a much better job at providing information that upskilled group members and in turn supported the entire group and reduced the amount of work required through individual conversations. Second, I am prone to discussing theories, concepts, and ideas that lean more existential and too often get stuck in theoretical thinking without bridging the gap to apply those theories and concepts to practice. The fifty-thousand-foot view does not always align well with the necessary skill of developing the business rules of an initiative. I received advice from multiple group members to “give us something to respond to”. I was kindly mentored throughout the year on how giving the group a concrete proposal to evaluate would allow the global view of the work to become more attainable and in turn, better move the work forward. Lastly, in running the working group as a Board I allowed too many unnecessary decisions to take up too much space. I leaned too heavily

on having the voice of the people build it together. This was in part, due to learning how to work with a board and in part a cover for my own indecision.

One of the major shortcomings to date is my inability to test, beyond theories and reports, the external validity threat or external political sustainability of the project. This was for two reasons. Most simply, I underestimated how long it would take to move the project internally—to unify KSDE around an idea that we all believed in and wanted to take to practitioners. Second, I constantly found myself suggesting to the Director of Accreditation that many of the issues the KESA team was trying to solve with accreditation were larger issues needing to be resolved by KSDE as a whole. Due to the evaluative nature of accreditation, KESA was often the one receiving blame anytime KSDE was not in line with their messaging and programs. For example, there were school systems in Kansas being recognized under one program for their performance while being conditionally accredited under KESA. Examples like this caused frustration and confusion throughout the state and needed to be improved beyond KESA.

A hinge point of the project, and key to its political sustainability, is the way in which KESA determines how student performance will be used and measured. For example, while there is a strong precedence for the state to focus on academics due to the moment in which we are in, this focus constitutes one of my biggest areas of caution. I am concerned that a narrow focus on academics may be a pendulum swing that positions KSDE in a similar scenario to what education faced and was criticized for under NCLB. A thoughtfully designed and well-communicated strategy will be needed to ensure that this system does not narrow the curriculum, increase test preparation activities, and promote educational triage.

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Defining improvement may remain the biggest determiner of the future power of KESA and not being able to define improvement is what I consider the great shortfall of the project. KSDE has made significant movements in building objectivity around a minimum standard and even developed tools to show improvement, but the working group has yet to fully conceptualize the way in which improvement will be evaluated. Improvement could be articulated through an independent tool separate from the floor, interact with the floor, or be evaluated through the floor model. This is not an insurmountable issue, but one I believe will need more time and a significant amount of modeling.

There are two major considerations worth noting when defining and measuring improvement that will have implications for KESA's political sustainability. First, the improvement language is the language that will box in the project. If KESA sets low floors and low improvement, KSDE can weaken the power and reach of KESA. Second, requiring improvement for all systems, separate from the floor, will keep KESA from being boxed in, but could quickly put KESA into an NCLB position where KESA will need to provide waivers which could eventually become unworkable as systems are unable to keep pace with the required trajectory.

The theory of action was built recognizing the necessity of having legitimacy and support to increase the confidence of stakeholders in accreditation and its ratings. The political sustainability as of this writing is positioned to enable the project to continue to be built and sustained. The working group continues to believe in the work and continues to provide needed expertise. To see success, the project must maintain its relationship and reliance on the working

group, finish defining the implications of improvement, and begin sharing the tools and rules with–and getting feedback from–external stakeholders.

Operational Capacity

The operational capacity of the project can be viewed through two lenses. The first is the technical design of the project. The second and more important lens relates to the considerations KSDE is making on using accountability as a formative tool or summative report.

My portion of the strategic project was centered on designing a system. My role in the Accreditation and Design division expanded the team's capacity as they made major changes to KESA. Of the five-member team, four were working on the KESA project, two ran the process working group, one ran the compliance working group, and I ran the results working group. I played a valuable role in expanding the operational capacity of the overall KESA redesign project. Separate from viewing operational capacity as my value on the overall project is the future operational capacity of KESA.

The operational capacity of this project is still being determined and rests on how KSDE wants accreditation to work. If KSDE wants accreditation pertaining to results to be an accountability system that defines and measures what they believe matters, then it is on track to be an effective tool. If KSDE wants the accountability side of KESA to communicate results, then the operational capacity is not there yet; there is still work to be done. The rules, guidance, and tools need to be developed in a way that can be understood by parents and used by school leaders, not just KSDE staff. If KSDE wants accountability to reward and incentivize success, then again, I think the tools–setting an academic floor and the demonstrated learning gains transition table–are positioned well. But I would be remiss if I do not take every opportunity to

indicate that I believe that style of a system will not substantially change education results in Kansas. Lastly, if KSDE wants accountability to provide interventions and support then KSDE has a significant amount of work before them.

I have yet to meet anyone at KSDE that does not want accountability to be connected with supports and interventions, but if we are serious about supports they need to be built with KESA not brought along after. More important than an espoused commitment to support is an enacted commitment by the way in which the working group is creating the system. If KESA wants to align accountability with the ability to provide interventions, then I believe KSDE must first define its expertise, capacity, and delivery model before KESA should solidify the objective measures by which systems will be evaluated. In many ways, this alignment is outside of the scope of my project. However, determining what system supports can be provided by the state, both in expertise and state capacity, and determining how those supports will be delivered, by whom, and for whom, is an undertaking that is connected to but bigger than KESA. Therefore, the redesign of KESA must wait until those systems and services are in place. Fortunately, this work has already begun through the school improvement working group led by Deputy Commissioner, Dr. Ben Proctor. Regardless of how ready the accreditation team feels in beginning their engagement with external stakeholders in implementing the new system, it is my opinion that it must wait and work in parallel with the school improvement working group. For this reason, I believe the improvement working group and KESA need at least another year to build out and align their systems before the KESA team can begin to teach and implement with practitioners.

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I made significant progress in determining how improvement in student performance will be used and measured. The operational capacity under threat is not pertaining to the technical design the tool produced but the implications made by the rules and how they will impact KSDE and systems throughout Kansas. The working group is on track in defining and measuring what they believe matters and is on track to be used to reward and incentivize systems. However, the system has yet to start the work necessary for KESA to communicate results beyond KSDE staff. Lastly and most importantly, there is significant work that must be done by KSDE in determining what system supports can be provided by the state and in what capacity before KESA should solidify the rules on how improvement in student performance will be used and measured.

Implications

Implications for Self

The residency allowed me to learn more about making change at a state level as well as to see my strengths and weaknesses as a leader in a different light. Below, I will elaborate on my leadership skills and capacities looking at areas of strength and weakness I noticed while in residency.

Organizing, Designing, and Building

This year I was reminded that I am an organizer, designer, and builder at heart. These attributes have continued to follow me throughout my career and served me well at KSDE. I noticed this year that these attributes help elevate my thinking and bring hope and energy to work that is otherwise draining and full of roadblocks. Previously, I looked at these more as attributes rather than strengths, often putting them aside as tools to be used in specific settings.

Throughout my experiences this year I have learned that I do not want these to be tools to aid me periodically in my future leadership careers. Rather, I need to find spaces that center the work around these principles. The process of organizing, designing, and building brings energy to my work, creates a level of buoyancy, and helps stave off burnout.

Thrive in Monitoring and Forecasting Organizational and Political Landscapes

A leadership strength I embraced this year was my love for monitoring and forecasting the organizational and political landscapes of KSDE, the state, and the sector. There were many technical aspects of my strategic project, as with every project, but these technical aspects were necessary but not sufficient to ensure ideas, programs, and processes were implemented. As I worked on the internal validity threat that faced KESA, I recognized the need to navigate complex situations, not only engage opposing views but to listen to criticism and find ways to recognize and validate the often harsh but accurate analysis of current KSDE operations. There were many state and national movements this year that have or will impact the work of KSDE and my strategic project. Tracking what has been done or is currently being considered, by the state and other states within education and politics helped better develop a politically sustainable strategic project. The strength in monitoring and forecasting organizational and political landscapes turned out to be a unique skill within KSDE and the sector. Using this skill in future work can continue to help provide a legitimate footing for the educational sector in developing and maintaining sustainable outcomes.

"Give us Something to Respond To"

The greatest area of growth in my leadership—based on the frequency it appeared—was the need to present things that allowed the group to respond. This feedback was presented by

multiple colleagues. At times, it was presented as a general strategy to help move the work forward. For example, a very effective colleague and policymaker shared his view on how his ideas often become the ideas that moved forward. He noted how ideas put to paper win out far more often than ideas alone. It is easier to criticize than to create. The process of creation not only refines ideas but presents things that allow the group to respond.

At times the principle was presented as a gentle critique of my work. I often found myself on a spectrum ranging from innumerable ideas to analysis paralysis. I hesitated to start developing policy because I did not know if it was worth creating or I hesitated until I felt comfortable knowing the entire landscape within that policy domain. Putting ideas to paper focused my work on both ends of the spectrum. It required me to slow down idea creation or force action out of paralysis.

Lastly, in this project, it was necessary for me to build consensus to reduce the internal validity threat, but building consensus did not have to equate to equally building everything together. I relied too heavily on my strengths of idea creation and navigating complex situations in the working group and did not do enough framing and upskilling group members. It became apparent that due to the many technical aspects of the project, often, working group members did not feel comfortable making decisions or even discussing options due to a lack of information and expertise. Presenting information for individuals to see and respond to would have better built a foundation of understanding and structure to assist working group members in their roles. I was grateful for the opportunity to engage in the work more technically. It taught me the value of refining ideas, upskilling colleagues, and presenting information in a way that allows others to respond.

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Indecision

My strength in collaborating and coordinating enabled a weakness of indecision. There were moments where I would bring decisions for group consensus only to realize that the group either did not have the foundational knowledge necessary to make the decision, or it was a decision that was not necessary to be brought to the group's attention. When the work became difficult, I found myself wanting to present ideas to senior leaders and allowing them to make difficult decisions. Even when a difficult decision is not my decision to make, I have found that my willingness to articulate a position—even if it is only internally—is making me a better policymaker. I am more inclined to refine my thinking and to ensure that what is presented is done more completely.

Implications for Site

Throughout the project and paper, I have presented recommendations KSDE can take to improve KESA. The recommendations are compiled and synthesized in Appendix X: Recommendations for the Kansas State Department of Education in Improving the Kansas Education System of Accreditation. In this section, I will touch on a few major implications and investments that if done, will significantly impact the value of KESA as a tool and strengthen KSDEs' capacity and sovereignty internally and externally.

Accountability is Not an Improvement Tool

Coming into the project I thought I could build a theory of action around inputs and outputs that would better position accreditation as an effective accountability and system improvement tool. I now believe that accountability systems are not improvement tools. Accountability systems can be the system or framework by which improvement tools—supports,

services, and initiatives—can be led and driven. Similarly, accreditation systems often lack the ability to be improvement tools as well. Accreditation systems at their most simple level are often assurance checks rather than providers of services and supports, leaving them more likely to improve compliance rather than performance.

Improvement tools are designed to enhance or optimize a system or process and that is not the design or role of accountability systems. Accountability systems define and measure what matters and communicate results. Results should be communicated in a way that can assist system leaders and stakeholders in acting on the information given. A well-built accountability system can inspire action. KSDE can also punish or reward systems according to their results. However, these are all motivators but not tools. Improvement tools are legitimate supports and services provided to systems. These supports and services are not an accountability system but can be identified through one.

At the beginning of my residency, I thought the inputs and outputs in my theory of action would reduce the validity threat to KESA and in turn better position accreditation as an effective accountability and system improvement tool. I have changed my thinking; I now believe that the improvement tool is not accreditation nor accountability, but the legitimate supports and services that could be provided to systems identified through them.

Accountability Should be Separated From KESA

Throughout the project, I continuously grew in my convictions that accountability is necessary for good governance and only useful when understood by stakeholders. This is done by ensuring that all data is presented in simple yet meaningful ways that assist system leaders in acting on the information given. This is the necessary foundation for an effective accountability

system. To further strengthen accountability and accreditation, I recommend that KSDE pulls apart accountability from accreditation allowing two separate functioning systems to operate and interact at a few pivotal points.

Accountability can exist independently from accreditation with both systems complementing each other. After looking at many models throughout the country—and keeping in mind the history of federal accountability—I became convinced that accountability should be the system by which the state transparently accounts either for (1) all the data indicators in which they collect or, (2) strategically report on the indicators the state believes make up the realm of system responsibility and are correlatively connected with post-secondary readiness and success. This system could be used at a district level to account for the level of effectiveness and to help ensure students are in the best position for post-secondary readiness and success.

There are benefits of separating accreditation and accountability at the state and local levels. The separation allows the state to use accountability to report, measure, monitor, and account for a plethora of indicators within the realm of education without formally having to engage in evaluations. This frees up accreditation to better focus on and evaluate a subset of specific indicators. These indicators could be ones that the state finds as crucial indicators in a healthy system, and/or indicators the state feels they can impact without devaluing indicators of importance that are beyond the direct impact and expertise of the state. At the local level, this separation lays the foundation and builds the autonomy of local systems to use data to manage and run their own system. This would empower local systems to focus on the indicators they feel are most pertinent in improving their local system.

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KSDE Should Systematically Rebuild Accreditation in line with KSDE Services and Supports

The Kansas State Department of Education should invest at least a year in systematically rebuilding accreditation and accountability to act as the evaluation system and in line with the associated improvement processes. The rational impulse is to negate this necessity due to the demand of urgency. The Kansas Department of Education must recognize this time as an investment by laying the necessary foundation to focus systems—including KESA—on alignment, long-term improvement, and sustainability. Systematically rebuilding and aligning the improvement process is the most vital path to avoid continuous missteps in being seen—internally and externally—as building the plane while flying or changing the rules in the middle of the game.

Two major efforts are critical as part of the systematic rebuild. First, KSDE needs to align definitions, terms, and expectations throughout all divisions and initiatives. For example, student performance as defined by KESA does not need to be the definition used by all other definitions, divisions, and initiatives, but it also cannot contradict the definitions of other initiatives. There are too many competing priorities throughout KSDE, therefore, it must be willing to eliminate, reduce, and align priorities, definitions, and initiatives. Doing so will be crucial in restoring and growing KSDE's value throughout the state. Second, for KSDE to align accreditation and accountability with supports and interventions then it must first define its expertise, capacity, and delivery model before KESA should solidify the objective measures by which systems will be evaluated. This may require the KESA team to hold on their redesign efforts until the school improvement team finishes its work.

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Currently, KESA's impact is being limited by KSDE's unwillingness to box it in. KESA is being asked to be an accreditation system, accountability system, and system improvement tool and in turn, is being hampered in its ability to perform any of those tasks effectively. Recognizing accountability and accreditation not as improvement tools, separating accreditation from accountability, and systematically rebuilding accreditation to evaluate and support improvement tools will better drive towards improvement.

Implications for Sector

The Reauthorization of the Elementary and Secondary Education Act Should Mandate Academic Growth to be Reported on for all Students at Every Level

In the next reauthorization of the Elementary and Secondary Education Act, Congress should require all states to report on academic growth for all subgroups identified in the law. Congress does not need to go so far as to require a growth model or evaluate the growth models used by states. However, Congress should require all states to report on academic growth and define growth as defined earlier by Castellano and Ho. Growth metrics are valuable, especially at a student level. The premier education federal law should go so far as to require all states to report on individual student academic growth at every level for all students and be reported annually, by all subgroups, and made available to parents. Mandating academic growth for all students at every level will provide valuable information to better assess schools' ability to account for growth in student performance.

The US Department of Education Should Undertake a Campaign to Increase the Public Perception and Value of Standardized Tests

There is enough evidence supporting the value of standardized tests that they should remain a key tool in school accountability. Even though Congress and the US Department of Education have shown no signs of eliminating their requirement and use from federal law, attacks on the test from individuals in both political parties have increased. If not protected, the value of standardized tests as a tool will become muffled, if not silenced. The US Department of Education should take a more deliberate approach to protect these necessary tools. The Department doesn't need to implore more mandates; this can be done through plenty of other means. The department can strengthen its value by increasing the public perception and understanding of these tests. This could be done through targeted competitive discretionary grants. For example, the funds could target teachers' colleges and other licensing providers, willing to make standardized tests, their application, value, and use as a tool, more robustly part of their matriculation requirements. Another key lane in increasing public perception is to provide more grant dollars for test designs to be innovative, (i.e., diagnostic, formative, or interactive). Taking the advice of Rick Hess, the Department could incentivize states and grantees to make sure the information gleaned from the tests better meets the needs of students, parents, and educators (Hess, 2022). Lastly, it is paramount that the information learned from these grantees be shared and elevated through state system networks to ensure that all states are learning not just grant recipients.

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Foster Sector Improvement in linking Processes and Outcomes

As mentioned throughout the paper accreditation and accountability are different approaches taken by states seeking to account for processes and outcomes. There continues to be a gaping hole in the evidence that connects processes and outcomes. Too often a system uses assurance checks fully based on input measures with evidence only as deep as perception surveys. On the other side of the spectrum, systems assurance checks report on outcomes with no connection as to why the outcomes were or were not achieved. The sector and keeping up with the demands of educating every student must become more centered on the evidence-based practices that connect processes and outcomes. Federal, state, and district requirements need to be better based on evidence. This is easier said than done, however, there are varying levels of evidence and systems can do more to use practices based on these levels. Part of linking these processes and outcomes requires the already available evidence to be more accessible and understandably placed in the hands of practitioners. Aggregators of evidence-based practices such as the What Works Clearinghouse could be more effective in tailoring material to specific audiences and in turn better meet the demands and influence everyday practitioners.

Through research, the education sector collects a disproportionate amount of data and evidence on what is being done but does not collect enough on the “why” and “how”. Due to the complexities of research, a disproportionate amount of evidence is being collected around products rather than processes. Researchers in the sector can help move school systems forward with more simple ways to evaluate practices and not just programs. The link of evidence between processes and outcomes is not easy, but that link is necessary to systematically improve student performance throughout the country and the world.

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The education sector can be better positioned to evaluate improvement in student performance. Congress should mandate academic growth be reported on all students at every level. The US Department of Education should work to increase the public perception and value of standardized tests. Educators, policymakers, and researchers throughout the sector must commit themselves to the evidence that connects processes and outcomes. The more these recommendations are acted upon, the more the entire sector will be better positioned to account for and evaluate improvement in student performance and in turn provide a world-class education for all students.

Conclusion

I have had a monumental learning experience during my time at the Kansas State Department of Education. The experience fulfilled everything I had hoped for in joining KSDE. I am grateful for the opportunity to have worked alongside amazing team members in the Accreditation and Design office, the results working group, and with teammates throughout KSDE. Through my strategic project, I worked alongside individuals who mentored me far beyond the work of the project. They upskilled my knowledge and deepened my thinking. Their commitment to the work was not only felt but seen in what the working group produced.

Through the overall efforts of the project, I have led a working group in a way that ensured key representatives participated and endorsed our work. The working group defined the indicators that would make up student performance. We have better established a way to measure the level of quality that can be expected from each system. We have reduced ambiguity and increased transparency around academic ratings. Lastly, we have begun to increase the confidence of internal stakeholders.

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Specifically, through our efforts, the working group defined student performance and brought with it a way to measure a minimum standard of performance by setting an academic floor. A few members of the working group and I developed and designed the transition tool that is built on the data of each and every student. This tool is being further developed to assist superintendents in identifying and measuring improvement and growth for all students. I submitted regulatory changes necessary for KESA operational legitimacy and deregulated unnecessary and unused regulatory definitions. I helped KSDE become more precise in its language pertaining to improvement and growth and by so doing helped foster a movement to bring on a true growth metric. I helped foster a change in view on accreditation versus accountability and have recommended the department bring on an accountability system that is separate with distinct minimal touch points to accreditation. Lastly, I pushed for KSDE to take a year to build and align KESA with the support services being developed by the school improvement working group.

However, the project is not complete and there is still work to be done. KSDE must finish solidifying how improvement will be measured and applied. Once done, the business rules and guidance can be written to ensure that system leaders can objectively and transparently understand how systems are being evaluated. Lastly, once appropriately positioned internally, KSDE must engage external stakeholders to share, take feedback, and adjust the tool to reduce the validity threat and increase system leaders' confidence in accreditation and its recommendations.

Through the project I have had many learnings, the following are key takeaways from accreditation and accountability:

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- A problem with input-based accountability is that it often lacks strength in its connection to the outcomes. You can drive compliance without driving change.
- The problem with outcome-based accountability is that it tells you if a system reached the outcome but does not tell you why.
- Most outcome-based accountability systems rely heavily on rewards, incentives, and motivation. This can be valuable, but only if those being motivated know how and have the tools for change.

My greatest learnings through the strategic project were derived from errors I made in the espoused outcomes of my theory of action:

First, I thought through the inputs and outputs identified I could reduce the validity threat to the Kansas Education System of Accreditation. Though still based on a theory, I now believe decreasing the validity threat is not done by increasing accuracy and transparency alone. It requires increasing legitimate support and services provided to systems identified through accreditation and accountability.

Lastly, I thought the inputs and outputs described in the theory of action would better position accreditation as an effective accountability and system improvement tool. I now believe that accountability systems are not improvement tools. Accountability systems can be the tracks by which system improvement—supports, services, and initiatives—can be led and driven. The first step in leading the world in the success of each and every student is identifying what success means, and how it's measured, and then bringing on supports and services that assist system leaders in providing those services. Accountability is necessary but not sufficient.

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Appendices

Appendix I: The Kansas Administrative Regulations 91-31-31 – Accreditation Rating Definitions

"**Accredited**" means the status assigned to an education system that meets the following conditions established by the state board:

(1) The education system is in good standing.

(2) The education system provides conclusive evidence of improvement in student performance.

(3) The education system provides conclusive evidence of a process of continuous improvement.

"**Conditionally accredited**" means the status assigned to any of the following:

(1) A new education system seeking accreditation;

(2) an education system seeking accreditation after one or more years of not seeking accreditation; or

(3) an education system about which both of the following are true:

(A) The education system is in good standing; and

(B) the education system provides neither conclusive evidence of growth in student performance nor conclusive evidence of a process of continuous improvement

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"**Not accredited**" means the status assigned to an education system that is described by either of the following:

(1) Is not in good standing; or

(2) fails to provide conclusive evidence of either improvement in student performance or a process of continuous improvement

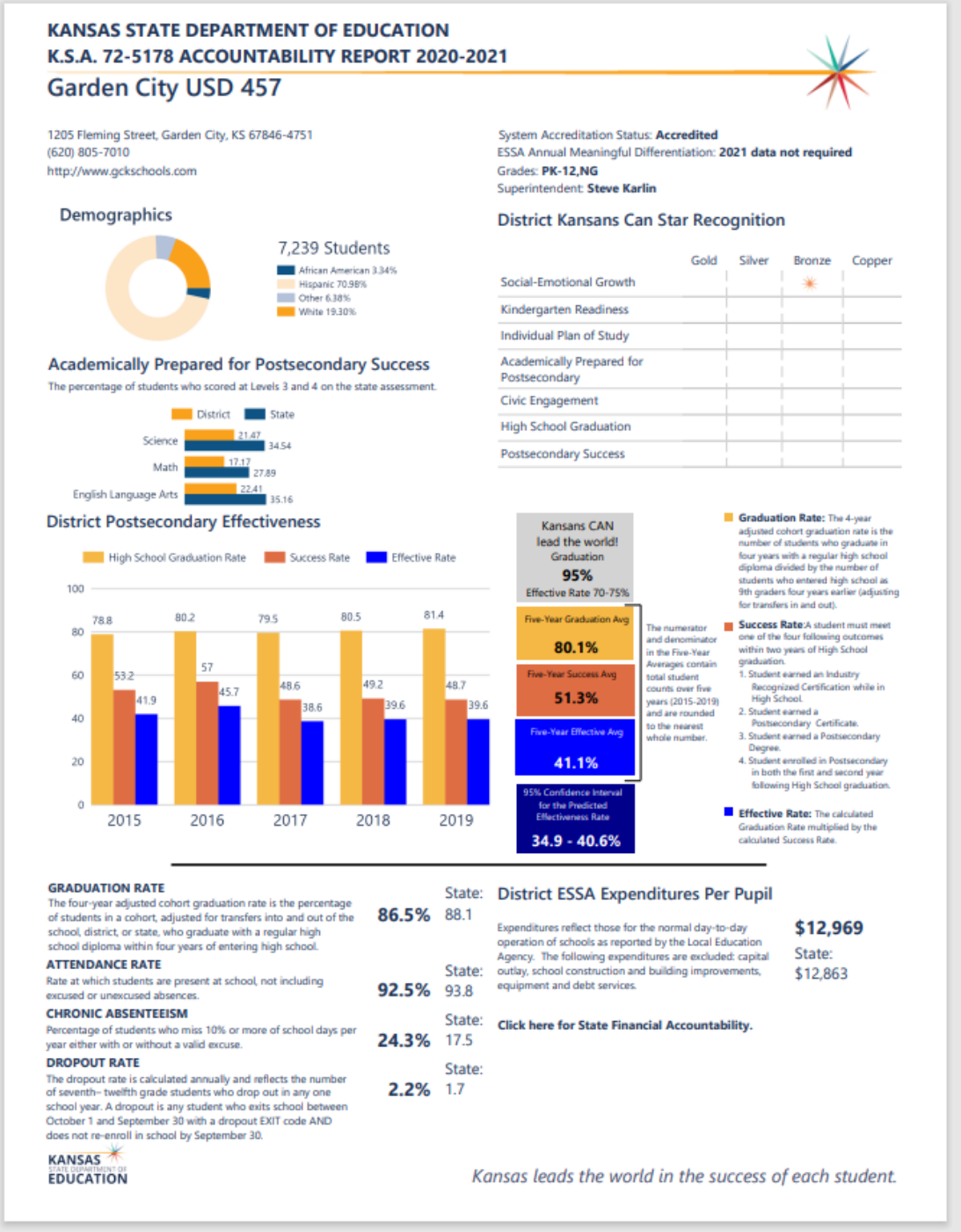
(KESA Definitions, 2005).

Appendix II: Number of Systems by Accreditation Ratings and Year (2017 – 2023)

Year	Systems Processed	Accredited	Conditionally Accredited	Not Accredited	Accredited after Appeal
2017 - 2018	8	8	0	0	0
2018 - 2019	21	21	0	0	0
2019 - 2020	23	18	5	0	0
2020 - 2021	39	33	6	5	3
2021 - 2022	92	84	8	0	0
2022 - 2023	179 (processing)				
Total	365	164	19	0	3

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Appendix III: System State Accountability Report Example



KANSAS STATE DEPARTMENT OF EDUCATION
K.S.A. 72-5178 ACCOUNTABILITY REPORT 2020-2021

Garden City USD 457

1205 Fleming Street, Garden City, KS 67846-4751
(620) 805-7010
http://www.gckschools.com

System Accreditation Status: **Accredited**
ESSA Annual Meaningful Differentiation: **2021 data not required**
Grades: **PK-12,NG**
Superintendent: **Steve Karlin**

Demographics

7,239 Students
African American 3.34%
Hispanic 70.98%
Other 6.38%
White 19.30%

District Kansans Can Star Recognition

	Gold	Silver	Bronze	Copper
Social-Emotional Growth			✶	
Kindergarten Readiness				
Individual Plan of Study				
Academically Prepared for Postsecondary				
Civic Engagement				
High School Graduation				
Postsecondary Success				

Academically Prepared for Postsecondary Success

The percentage of students who scored at Levels 3 and 4 on the state assessment.

	District	State
Science	21.47	34.54
Math	17.17	27.89
English Language Arts	22.41	35.16

District Postsecondary Effectiveness

	High School Graduation Rate	Success Rate	Effective Rate
2015	78.8	53.2	41.9
2016	80.2	57	45.7
2017	79.5	48.6	38.6
2018	80.5	49.2	39.6
2019	81.4	48.7	39.6

Kansans CAN lead the world!
Graduation **95%**
Effective Rate 70-75%

Five-Year Graduation Avg **80.1%**
Five-Year Success Avg **51.3%**
Five-Year Effective Avg **41.1%**

95% Confidence Interval for the Predicted Effectiveness Rate **34.9 - 40.6%**

The numerator and denominator in the Five-Year Averages contain total student counts over five years (2015-2019) and are rounded to the nearest whole number.

Graduation Rate: The 4-year adjusted cohort graduation rate is the number of students who graduate in four years with a regular high school diploma divided by the number of students who entered high school as 9th graders four years earlier (adjusting for transfers in and out).

Success Rate: A student must meet one of the four following outcomes within two years of High School graduation.
1. Student earned an Industry Recognized Certification while in High School.
2. Student earned a Postsecondary Certificate.
3. Student earned a Postsecondary Degree.
4. Student enrolled in Postsecondary in both the first and second year following High School graduation.

Effective Rate: The calculated Graduation Rate multiplied by the calculated Success Rate.

GRADUATION RATE
The four-year adjusted cohort graduation rate is the percentage of students in a cohort, adjusted for transfers into and out of the school, district, or state, who graduate with a regular high school diploma within four years of entering high school.
86.5% State: 88.1

ATTENDANCE RATE
Rate at which students are present at school, not including excused or unexcused absences.
92.5% State: 93.8

CHRONIC ABSENTEEISM
Percentage of students who miss 10% or more of school days per year either with or without a valid excuse.
24.3% State: 17.5

DROPOUT RATE
The dropout rate is calculated annually and reflects the number of seventh– twelfth grade students who drop out in any one school year. A dropout is any student who exits school between October 1 and September 30 with a dropout EXIT code AND does not re-enroll in school by September 30.
2.2% State: 1.7

District ESSA Expenditures Per Pupil

Expenditures reflect those for the normal day-to-day operation of schools as reported by the Local Education Agency. The following expenditures are excluded: capital outlay, school construction and building improvements, equipment and debt services.

$12,969
State: $12,863

Click here for State Financial Accountability.

KANSAS STATE DEPARTMENT OF EDUCATION

Kansas leads the world in the success of each student.

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Garden City USD 457

K.S.A. 72-5178 Accountability Report 2020-2021

District Academic Success

State Assessment scores are displayed by student subgroup over three years time in three subjects: Math, English Language Arts (ELA), and Science. Assessment scores are not available for the 2020 school year.

ALL STUDENTS

	2018-19			2019-20			2020-21		
	Math	ELA	Sci	Math	ELA	Sci	Math	ELA	Sci
Level 1	38.32	39.13	49.60	N/A	N/A	N/A	46.40	39.91	50.43
Level 2	41.65	36.47	29.56	N/A	N/A	N/A	36.42	37.66	28.08
Level 3	15.36	20.10	16.03	N/A	N/A	N/A	13.66	18.75	16.23
Level 4	4.65	4.28	4.79	N/A	N/A	N/A	3.51	3.66	5.24

FREE AND REDUCED LUNCH STUDENTS

	2018-19			2019-20			2020-21		
	Math	ELA	Sci	Math	ELA	Sci	Math	ELA	Sci
Level 1	42.07	44.47	55.62	N/A	N/A	N/A	52.35	46.24	55.65
Level 2	42.97	36.90	28.79	N/A	N/A	N/A	35.79	37.74	29.17
Level 3	12.35	16.17	13.00	N/A	N/A	N/A	10.27	14.13	12.71
Level 4	2.59	2.44	2.57	N/A	N/A	N/A	1.57	1.87	2.45

STUDENTS WITH DISABILITIES

	2018-19			2019-20			2020-21		
	Math	ELA	Sci	Math	ELA	Sci	Math	ELA	Sci
Level 1	72.47	71.22	82.11	N/A	N/A	N/A	77.89	74.94	77.01
Level 2	23.29	19.81	15.89	N/A	N/A	N/A	18.59	20.39	14.94
Level 3	3.05	7.54	1.32	N/A	N/A	N/A	2.84	4.21	6.89
Level 4	1.17	1.41	0.66	N/A	N/A	N/A	0.65	0.44	1.14

AFRICAN-AMERICAN STUDENTS

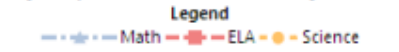
	2018-19			2019-20			2020-21		
	Math	ELA	Sci	Math	ELA	Sci	Math	ELA	Sci
Level 1	45.09	51.68	74.28	N/A	N/A	N/A	58.77	45.61	66.00
Level 2	47.05	22.47	11.42	N/A	N/A	N/A	28.94	35.08	26.00
Level 3	4.90	23.59	11.42	N/A	N/A	N/A	8.77	16.66	8.00
Level 4	2.94	2.24	2.85	N/A	N/A	N/A	3.50	2.63	0.00

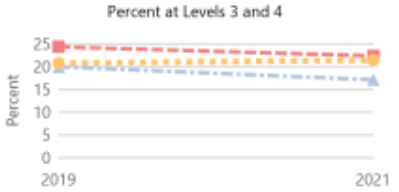
HISPANIC STUDENTS

	2018-19			2019-20			2020-21		
	Math	ELA	Sci	Math	ELA	Sci	Math	ELA	Sci
Level 1	42.25	42.75	53.42	N/A	N/A	N/A	51.14	43.78	55.48
Level 2	42.73	38.26	30.28	N/A	N/A	N/A	36.44	38.47	28.17
Level 3	12.50	16.49	13.80	N/A	N/A	N/A	10.81	15.78	13.39
Level 4	2.50	2.48	2.47	N/A	N/A	N/A	1.59	1.95	2.93

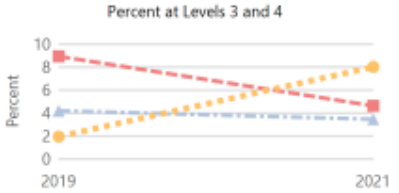
N/A: To protect student privacy, when a subgroup has fewer than 10 students, the data are not displayed.

Academically Prepared for Postsecondary Success









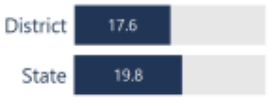




ACT Performance (2021 School Year)

ACT is a national college admissions exam that includes subject level tests in English, Math, Reading and Science. Students receive scores that range from 1 to 36 on each subject and an overall Composite score. This report provides the average Composite score for the 2021 graduating seniors who took the ACT as sophomores, juniors, or seniors.

Note: Not all eligible students completed an ACT.



Kansans CAN

Report generated from ksreportcard.ksde.org on March 14, 2022 - Version 1.1.

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Appendix IV: Growth Measures State by State, Findings From DQC's Analysis of State-Approved ESSA Plans

Findings from DQC's analysis of state-approved ESSA plans:

State	Growth measure state will use for accountability indicator, according to ESSA plan	The state includes a measure of individual student growth in accountability	
		For elementary and middle school	For high school
Alabama	Gain Score	✔	✔
Alaska	Value Table	✔	
Arizona	Multiple Measures: Student Growth Percentile, Growth to Standard	✔	
Arkansas	Value Added	✔	✔
California	None		
Colorado	Student Growth Percentile	✔	✔
Connecticut	Growth to Standard	✔	
Delaware	Other	✔	✔
District of Columbia	Student Growth Percentile	✔	✔
Florida	Value Table	✔	✔
Georgia	Student Growth Percentile	✔	✔
Hawaii	Student Growth Percentile	✔	
Idaho	Growth to Standard	✔	
Illinois	Other	✔	
Indiana	Multiple Measures: Value Table, Student Growth Percentile, Growth to Standard	✔	
Iowa	Student Growth Percentile	✔	✔
Kansas	None		
Kentucky	Multiple Measures: Value Table, Growth to Standard	✔	
Louisiana	Multiple Measures: Value Added, Growth to Standard	✔	✔
Maine	Value Table	✔	
Maryland	Student Growth Percentile	✔	
Massachusetts	Student Growth Percentile	✔	✔
Michigan	Multiple Measures: Student Growth Percentile, Growth to Standard	✔	✔
Minnesota	Value Table	✔	
Mississippi	Value Table	✔	✔
Missouri	Value Added	✔	
Montana	Other	✔	
Nebraska	Value Table	✔	
Nevada	Multiple Measures: Student Growth Percentile, Growth to Standard	✔	
New Hampshire	Student Growth Percentile	✔	
New Jersey	Student Growth Percentile	✔	
New Mexico	Multiple Measures: Student Growth Percentile, Value Added	✔	✔
New York	Student Growth Percentile	✔	
North Carolina	Value Added	✔	✔

Note: Adapted from the Data Quality Campaign's Analysis of State-Approved ESSA Plans (Growth Data: It Matters, and It's Complicated, *2019) Copyright 2019 by Data Quality Campaign.*

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Appendix V: Academic Achievement and Growth Weights by State

Link to Federal Accountability Tracker

Achievement Weights		
State	Elementary	High School
Alabama	40.0%	20.0%
Alaska	30.0%	20.0%
Arizona	60.0%	60.0%
Arkansas	35.0%	20.0%
California	20.0%	20.0%
Colorado	23.3%	20.0%
Connecticut	30.0%	55.0%
Delaware	30.0%	30.0%
District of Columbia	30.0%	42.0%
Florida	40.0%	55.0%
Georgia	30.0%	30.0%
Hawaii		
Idaho	36.0%	45.0%
Illinois	15.0%	15.0%
Indiana	42.5%	15.0%
Iowa	12.0%	39.0%
Kansas	25.0%	25.0%
Kentucky	51.0%	45.0%
Louisiana	50% / 46.67% ES / MS	20.8%
Maine	decision tree	
Maryland	20.0%	30.0%
Massachusetts	40.0%	33.3%
Michigan	29.0%	29.0%
Minnesota	Stage-based decision process	
Mississippi	27.0%	19.0%
Missouri	40.0%	40.0%
Montana	35.0%	30.0%
Nebraska	Stage-based decision process	
Nevada	25 %	25.0%
New Hampshire	Stage-based decision process	
New Jersey	30.0%	25.0%
New Mexico	30.0%	
New York	Stage-based decision process	
North Carolina	Weights: Schools are awarded points for the percentage of students who meet the requirements for each indicator. These scores are used to determine the final score and corresponding letter grade by using a "composite approach".	
North Dakota	30.0%	11.3%
Oklahoma	30.0%	30.0%
Ohio	27.5%	
Oregon	The accountability system will apply additional weights to academic growth for elementary and middle schools, and to graduation for high schools	
Pennsylvania	Three-step process	
Puerto Rico		
Rhode Island	A sliding scale between 10%-40%	
South Carolina	35.0%	25.0%
South Dakota	40.0%	40.0%
Tennessee	45.0%	30.0%
Texas	30.0%	40% (Best of)
Utah	37.0%	25.0%
Vermont	35.0%	40.0%
Virginia	multistep methodology	
Washington	15-20% Slides based on N size	
West Virginia	17.8%	20.8%
Wisconsin	37.5%	42.5% Slides based on N size
Wyoming	25.0%	20.0%

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Academic Growth Weights by State

Growth Weights			
State	**Elementary**	**High School**	**Notes**
Alabama	40.00%	25.00%	
Alaska	40.00%	40.00%	
Arizona	20.00%		Replaced by graduation rates
Arkansas	50.00%	35.00%	
California			Achievment and growth are combined
Colorado	40.00%	20.00%	
Connecticut	42.00%	33.00%	
Delaware	40.00%		Replace with graduation rate, on track attendance, and college and career
District of Columbia	40.00%		Replaced with graduation and post secondary ready indicators
Florida	50.00%	18.00%	The Academic Achievement indicator includes student growth in high school, including a measure of learning gains among the lowest 25% of students in math and ELA. This is worth 200 of the 600 points in the Growth indicator.
Georgia	35.00%	30.00%	
Hawaii			Replace by Graduation rates
Idaho	36.00%		Replaced by greaduation rates
Illinois	50.00%	50.00%	
Indiana	42.50%	15.00%	
Iowa	36.00%		Replaced with graeudation rate, & CCR
Kansas	25.00%		Replace by Graduation rates
Kentucky	30.00%	45.00%	Achievement 45% includes growth
Louisiana	25.00%		Replaced with greaduation, student ACT workKes, strength of diploma credentials
Maine			ES - Sliding scale HS - Replaced grade rate, estended grad rate,
Maryland	25.00%		Replaced with grad rate and CCR
Massachusetts	25.00%	20.00%	
Michigan	34.00%	34.00%	
Minnesota			ES - stage base decision process HS - Replace by Graduation rates
Mississippi	54.00%	38.00%	
Missouri	30.00%		Replace by Graduation rates
Montana	30.00%		Replaced with grad rate, and CCR

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Nebraska			Stage base decision process
Nevada	35.00%		Replaced by grad rate CCR
New Hampshire			Decision Rules
New Jersey	40.00%		Replaced with Graduation rates
New Mexico	40.00%	30.00%	
New York			Stage-base decision process
North Carolina			Schools are awarded points for the percentage of students who meet the requirements for each indicator.
North Dakota	30.00%		Growth replaced with graduation rates, CCR,
Ohio	29.16%	23.00%	The weight is for middle school no growth measure in ES
Oklahoma	30.00%		Replaced with grduation CCR
Oregon			ES - Growth but weights aren't clarified HS - Replaced by graduation and on track to graduation, five-year HS completion rate
Pennsylvania			ES - Three step process HS - Replaced by graduation rates and College and Career Readiness
Puerto Rico			
Rhode Island	10% - 30%	30.00%	Between 1-3 points
South Carolina	35.00%		Replaced by greaduation rates CCR
South Dakota	40.00%		Replaced by grad rates, HS completion, CCR
Tennessee	35.00%	25.00%	
Texas	50.00%		School Progress has academic growth and relative performance
Utah	37.00%	25.00%	
Vermont	35.00%		Replaced by gread rate, CCR, Postsecondary outcomes
Virginia			ES- Multi-step decision making HS - Replaced with grad rate
Washington	55.00%		ES - Sliding Scale 0-55 HS - Replaced by grad rate, Success,
West Virginia	23.70%		Replaced by graduation rate, on track to graeduation, college and career readiness
Wisconsin	37.5 - 42.5%		Replaced with graduation rate
Wyoming	25.00%	20.00%	

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Appendix VI: Consolidated State Plan Indicators Grouped by Commonality

Orgin	Indicators	# of States	Notes
Indicators & Weights for HS & ES	Achievement	ALL	
	Growth	49 states ES / 20 States HS	KS is the only state not using a Growth model **HS:** AL, AR, CO, DE, DC, FL, GA, IA, LA, MA, MI, MS, NM, NC, ND, OH, PA, RI, TN, UT
	English Language Proficiency	50 ES / 46 HS	
	Science Achievement	11 Both / 1 ES / 1 HS	**Both:** CO, DE, IL, LA, MS, NE, NM, NC, OH, OK, VT **ES:** MT **HS:** FL
	Social Studies	2 Both / 1 ES / 2 HS	**Both:** LA, FL **ES:** DE **HS:** OH, MS
	Language Arts	2 States	**Both:** OH **ES:** AK **HS:**
	Chronic Absenteeism	23 Both / 6 ES	**Both:** AL, AK, CT, DC, HI, IL, ME, MD, MO, Mt, NE, NJ, NM, NY, OH, OK, OR, PA, RI, TN, VA, WV, WI **ES:** AZ, CA, CO, FL, IN, SD
	Graduation Rate		UT is the only state not using Grad Rate as an indicator
	Grad Rate: 4 year	9 states	Specifically calls out: AR, CO, CT, DE, DC, FL, ME, NM, OH
	Grad Rate: 5 year	9 states	**5 YR:** OH, NM, DE, AR, AK **6 YR:** NM, CT **Combined 5/6 yr:** ME **7 YR:** CO
	Drop-out	1 ES / 2 HS	**Both:** **ES:** LA **HS:** AZ, CO
	College and Career Readiness	1 Both / 29 HS	**Both:** PA **ES:** **HS:** AL, CA, CT, DE, DC, FL, IL, IN, IA, KY, MD, MS, MT, NV, NM, NY, NC, ND, OH, OK, RI, SC, SD, TN, UT, VT, WV, WY
SQSS Indicators	P-2 Indicators	1	IL
	Reading at Grade Level	3	AR, OH, AK
	Curriculum	4	MD, MI, NC, MA
	Arts Access	2	CT, IL
	Science Achievement	11	AR, CO, CT, DE, FL, MA, MS, MT,NE, NC, VT,
	Social Studies	3	DE, FL, MS
	Assessments	7	IA, KS, MS, RI, SC, TX, LA,
	Attendance	5	MN, RI, DC, MA, CO
	Chronic Absenteeism	25	AK, AR, DC, DE, HI, IL, MD, MA, MI, MO, MT, NE,NJ, NM, NY, OH, OK, OR, PA, SD, TN, VA, WA, WV, WI
	Climate Survey	7	KY, MD, MT, NM, ND, SC, IL
	Engagement	2	NV, ID
	Suspension Rate	3	CA, RI, WV
	Growth	4	NH, NC, OH, UT
	Closing the Gap	1	OH
	Gifted Indicator	2	OH, RI
	Course Credit / GPA	2	AR, LA
	ACT	2	AR, LA
	AP	2	AR, MI
	Graduation	9	CT, DE, IL, MA, OR, SD, WA, WV,
	College and Career Readiness	30	AL, CA, DE, FL, ID, IL, IN, IA, KY, MD, MI, MS, MT, NV, NM, NY, NC, ND, OH, PA, RI, SC, SD, TN, TX, UT, VT, WA, WV, WY
	Other	12	AR, CT, IA, MD, MI, NE, VA, GA, FL, IL, MA, GA
Other: Indicators & Weights for HS & ES	K-12 Indicators	3	
	Readiness	1	
	Student Success	5	
	School Quality	3	
	School Environment	2	
	Climate Survey	8	
	Student engagement	1	
	Attendance	5	
	Academics	4	
	Assessments	8	
	Curriculum	2	
	Physical Fitness	3	
	Diploma Credentials	4	
	Postsecondary	3	
	Access	1	
	On-Track / Acceleration	7	
	Student Improvement	2	
	Student Growth	3	
	Closing the Gap	6	
	Equity	1	
	Gifted Students	2	
	State Accountability Indicators	2	
	Other:	4	

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Appendix VII: Evidence of and Progress Made Toward the Theory of Action (as of March 2023)

Theory of Action "If" Statement	Inputs	Progress
Ensure key representatives participate, co-create, and endorse the work of the group	**Evidence:** Working group makeup, co-create idea development	Most
Define the indicator(s) that will make up student performance	**Evidence:** Presented field scan of SEA ESSA performance indicators. **Artifact:** screenshot of state accountability tracker to determine how to define student performance	Most
Determine how improvement in student performance will be use and measured	**Evidence:** Developed a tool to identify improvement in student performance **Artifact:** Transition Table **Artifact:** Academic floor modeling	Little
Theory of Action "Then" Statement	**Outputs**	**Progress**
Better establish and measure the level of quality that can be expected from each local education agency (system) Reduce ambiguity and increase transparency around accreditation ratings	**Evidence:** Defined student performance Objectively identified the cut off for conditionally accredited systems	Most
Increase the confidence of internal stakeholders (divisions, and staff within KSDE) and external stakeholders (system leaders) in accreditation recommendations	**Evidence:** Co-created the transition table and setting the floor Fostered the environment to recognize the value in measuring growth Changed our view of accreditation and accountability Spun off accountability working group Build year to aligned KESA with other department infrastructure	Some
Theory of Action "Then" Statement	**Outcomes**	**Progress**
KSDE can reduce the validity threat to the Kansas Education System of Accreditation We can better position accreditation as an effective accountability and system improvement tool	**Evidence:** Rewrote regulations Spun off growth model working group Part of the system to align KESA supports	To be determined

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Appendix VIII: Snapshot of Country-Wide Indicators

Highlights from state report cards - Google Docs		Alabama	Alaska	Arizona
STATES' SCHOOL ACCOUNTABILITY SYSTEMS		AL	AK	AZ
Rating System		Federal Tiers of Support	Index Rating System	Federal Tiers of Support
Subgroups	Racial and Ethnic Groups:	Racial and ethnic groups: - American Indian/Alaska Native - Asian - Black or African American - Hispanic/Latino - Native Hawaiian/Pacific Islander - White - Two or more races Students with disabilities Economically disadvantaged Students with limited English proficiency	Racial and ethnic groups: - African-Americans - Alaska Natives and American Indians - Asians or Pacific Islanders - Hispanics - Whites - Two or more races Economically disadvantaged students Students with disabilities English learners	Racial and ethnic groups: - American Indian/Native American - Asian - Black/African American - Hispanic/Latino - Native Hawaiian/Pacific Islander - White - Multiple races Economically disadvantaged Children with disabilities English learners Students who take advanced math end-of-course assessments prior to high school
Indicators and Weights for Elementary/Middle	Notes:	Achievement (40%) Growth (40%) English Language Proficiency (5%) Chronic Absenteeism (15%)	Schools with Students in Grades K-6: Achievement (30%) Growth (40%) English Language Proficiency (15%) Chronic Absenteeism (10%) Grade Three Language Arts Proficiency (5%)	Achievement (60%) Growth (20%) English Language Proficiency (Proficiency and Growth) (10%) Chronic Absenteeism (10%) NOTE: These weights change for combination schools including and not including grade 12.
Indicators and Weights for High School	Notes:	Achievement (20%) Growth (25%) English Language Proficiency (5%) Graduation Rates (30%) Chronic Absenteeism (10%) College and Career Readiness (10%)	Schools with Students in Grades 7 and Above: Achievement (20%) Growth (40%) English Language Proficiency (10%) Graduation Rate: 4-year (15%) Graduation Rate: 5-year (5%) Chronic Absenteeism (10%) NOTE: For schools that serve grade 12, the academic achievement indicator incorporates student growth.	Proficiency (60%) Graduation Rates (20%) English Language Proficiency (Proficiency and Growth 10%) Drop-out (10%) NOTE: These weights change for combination schools including and not including grade 12.
SQSS Measure	Other	**College and career readiness (HS):** The percentage of students who meet at least one of the following criteria. - Achieving a benchmark score on the ACT, - Scoring a 3, 4, or 5 on an Advanced Placement exam/scoring a 4, 5, 6, or 7 on an International Baccalaureate exam, - Scoring silver level or above on ACT Work Keys, - Earning a transcripted college credit while still in high school, - Earning an Industry Credential, or - Being accepted for enlistment into any branch of the military.	**Chronic Absenteeism (ES/MS/HS):** The percentage of students who miss at least 10 percent of school days while enrolled. **Grade three English Language Arts Proficiency (ES):** The percentage of students proficient in grade 3 ELA. - If the percentage of students scoring at the proficient or advanced achievement level is greater than 20 percent but less than 80 percent, the points earned are the percentage of students scoring at the proficient or advanced achievement level or higher; - If the percentage of students scoring at the proficient or advanced achievement level is less than or equal to 20 percent, the points earned are zero; and - If the percentage of students scoring at the proficient or advanced achievement level is greater than or equal to 80 percent, the points earned are 100.	**Chronic Absenteeism (ES/MS):** The percentage of students absent for 10% or more of the year. **Drop-out (HS):** The percentage of students who drop out of high school.
Growth Model	Models: Value-added, student growth percentile, Value-table, gain-score	Gain Score	Value Table	Multiple Measures: Student Growth Percentile, Growth to Standard
	Elementary	x	x	x
	High School -	x		

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Appendix IX: Cut Score Face sheet, a Table to Help Set a Floor Based on KSDE Capacity

Total Kansas Systems	**303**
Total Kansas Students Tested in Math	254,284
Total Kansas Students Tested in ELA	253,649
Total Kansas Students in API 1-2	83,292
% of Kansas Students in API 1-2	32.8%
KLN List - 44 systems have 96 schools identified under ESSA	96

% of students in API 1-2	Line Impact						KLN List ESSA Status Math breakdown (ELA list)	Notes
	Total systems (ELA and Math)	Total Student Count	IF we only want to focus on systems triggered by both ELA and Math	Total Overlap Student Count	Math impact Line (Total # of Systems)	ELA impact Line (Total # of Systems)		
100%	1	2 0.00%			1			State school
90-99%	2	35 0.01%			2			State schools
80-89%	3	48 0.02%	2	47 0.02%	3	2		State Schools
70-79%	4	113 0.04%	3	110 0.04%	4	3		State Schools
65-69%	5	225 0.09%	3	110 0.04%	5	3		Deerfield + SS
60-64%	6	2658 1.05%	3	110 0.04%	6	3		Liberal + above schools
55-59%	10	35474 13.95%	5	13096 5.15%	9	6	2	Liberal & KCK qualify in both categories
50-54%	19	44289 17.42%	10	36421 14.32%	17	12	3	
45-49%	40	64256 25.27%	22	54515 21.44%	32	30	9	
40-44%	72	77821 30.60%	44	68057 26.76%	61	53	7	
35-39%	123	104424 41.07%	70	84052 33.05%	96	97	9	
30-34%	193	141212 55.53%	131	116943 45.99%	144	180	9	
25-29%	250	204120 80.27%	199	150832 59.32%	219	230	2	
20-24%	270	213298 83.88%	255	210626 82.83%	258	268	2	
15-19%	294	245991 96.74%	277	230252 90.55%	283	288	1	
10-14%	302	253778 99.80%	300	253269 99.60%	301	301		
5-9%	302	253778 99.80%	300	254084 99.92%	302	301		
1-4%	302	253778 99.80%	302	254109 99.93%	302	302		
0%	303	253801 99.81%	303	254132 99.94%	303	303		

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Appendix X: Recommendations for the Kansas State Department of Education in Improving the Kansas Education System of Accreditation

1. For KSDE to see success towards the finished project they must maintain the relationship and reliance on the working group as co-creators, finish defining the implications of improvement and begin the next phase of external collaboration by sharing the tools and rules, getting feedback from external stakeholders, and adjust the theory on practical realities as informed by external partners.

2. Continue the process of bringing on an academic growth indicator. Require systems to account for (1) all students, and (2) students in the lowest 25% (Students whose prior year assessments scores are in the lowest performing 25% of the district).

3. KSDE needs to grow the public value of accountability for parents, teachers, and system leaders. Part of the work required will be to continue building out the transition table and similar resources to ensure that all data is presented in simple yet meaningful ways that assist in acting on the information given. As part of this work, KSDE should consider ways in which they can grow the value of state exams by helping educational stakeholders better understand why the information shared is valid and can be used to support student learning.

4. KSDE should evaluate all input measures to determine the level of evidence each indicator has on improving student performance. Indicators that do not meet a specific threshold should be discontinued to create space for evidence-based practices.

5. The Kansas State Department of Education should not shy away from reregulating accreditation. Ideas have been raised that will improve accreditation but are not currently in line with current regulations. KSDE Education should not feel confined to creating a new system within regulation, rather they should systematically rebuild the system that will improve schools and then write regulations to support that system.

6. KSDE should invest at least a year in systematically rebuilding the improvement process and evaluation system. This investment would include:
    a. Aligning accountability with the ability to provide interventions, by first defining its expertise, capacity, and delivery model before solidifying the objective measures by which systems will be evaluated.

    b. Separate accreditation and accountability with minimum but necessary touchpoints. This would allow KSDE to better transparently account for all indicators in which they collect data. Accountability systems could show and elevate indicators of responsibility without formal KESA evaluations.

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c. Student performance, as defined by KESA, needs to be clear objective, and measurable. KSDE must also ensure that the definition used does not contradict any other definitions, divisions, or initiatives. There are too many competing priorities throughout KSDE. Reducing and aligning priorities, definitions, and initiatives are crucial to restoring and growing KSDE's value throughout the state.