

DISTRICT ACCOUNTABILITY FRAMEWORK

November 18, 2003 (First Reading)

June 8, 2004 (Revised)

Introductory Statement

Over the past two years, the district has been working to develop a comprehensive internal accountability process that wraps around and builds upon mandated state and federal accountability structures and requirements. The districtwide system proposed in this report will hold all schools authorized under the San Diego City Schools Board of Education accountable for improving student achievement. This includes those schools directly managed by the district, those schools operating as contract schools under a board-approved Memorandum of Understanding,¹ and those schools operating as charters under board-approved petitions. For the purposes of this report, district-managed schools, contract schools, and charter schools are considered “district schools.” This report brings forward, for Board of Education approval, the outline of a District Accountability Framework. Implementation of the District Accountability Framework will begin during the 2004-05 academic year.

Background

Accountability for student achievement was the watchphrase of the 1990s and, during that time, a number of district and state accountability systems were developed and initiated across the nation – the most comprehensive and well-known being those in San Diego, Charlotte-Mecklenburg (North Carolina), Texas, and Kentucky. The San Diego City Schools accountability system², which was developed by key stakeholders (teachers, administrators, parents, and community members) and implemented during the mid-1990s, was consistent with the 1994 reauthorization of the Elementary and Secondary Education Act (ESEA), which established new accountability provisions for schools receiving Title I funds. The district accountability system described above has been superseded by subsequent state and federal requirements.

California entered into the formal accountability arena with the establishment of a statewide accountability system under the *Public Schools Accountability Act* (PSAA) of 1999. And the *No Child Left Behind Act* (NCLB) of 2001 significantly extended and formalized the federal accountability requirements and timelines for schools, districts, and states receiving Title I funds under ESEA. Both the United States Department of Education (USDOE) and the California Department of Education (CDE) continue to develop and disseminate regulatory guidance relative to the implementation of NCLB and the PSAA. NCLB and the PSAA replace, as a matter of law, all previously developed federal, state, and local accountability systems, and school districts across California are mandated to comply with all requirements of both NCLB and the PSAA.

¹ Currently, this includes the three schools participating in the City Heights/SDSU Collaborative (Rosa Parks Elementary School, Clark Middle School, and Hoover High School) and La Jolla High School.

² San Diego City Schools. *District Accountability System for Improving Student Achievement*. April 1997.

In addition to accountability expectations identified under NCLB and the PSAA, charter school accountability for achievement progress is further delineated in the recently passed AB 1137³. Effective January 1, 2005, and under a set of conditions now codified in law, charter school academic non-performance may result in the denial of an action for renewal of a charter.

Discussion

The specific nature of the accountability system that California has adopted to meet the requirements of federal NCLB legislation severely limits the parameters of a district accountability system. However, a formal District Accountability Framework is needed to address three key challenges associated with district-level implementation of the current (and somewhat conflicting) federal and state accountability requirements. For approximately two years, a district accountability work group has been meeting to follow the development of the federal and state accountability systems, and to design a district accountability system that addresses these challenges. A list of those involved in the district accountability work group is provided in **Attachment A**.

District Accountability Challenges

First, to improve student achievement by supporting teaching and learning in the classroom, the accountability process must be **comprehensive and coherent**. The district process will establish common criteria and timelines for school recognition, support, and intervention. At present, the state and federal accountability programs differ in their use of assessment results, their goals and targets, and their timelines for support and intervention. The proposed District Accountability Framework builds upon the substantial and thoughtful work already done by CDE to align and honor both the performance-driven federal system and the progress-driven state system.

Second, the district process will provide **early, site-specific support and intervention** aimed at helping schools improve achievement for all students so that they meet their Academic Performance Index (API) targets and make Adequate Yearly Progress (AYP) – and avoid federal and state sanctions.

Third, the district accountability process will hold both the **school and the system accountable** for “providing the conditions necessary for ambitious teaching and for improved student results.”⁴ School Accountability Agreements will be developed for all schools: district-managed schools, contract schools, and charter schools. These accountability agreements will ensure that the participants understand their roles and responsibilities in the accountability process, and accept accountability for improving instruction and student achievement.

The Purpose of the District Accountability Framework

The purpose of the District Accountability Framework is to support increased expectations for the system and its schools – and build the capacity of staff to meet these expectations – so that **all** students at **all** schools receive the instruction and support they need to meet state content standards, pass the California High School Exit Examination, and be prepared for a wide range of post-secondary opportunities.

³ Education Code 47607 (b) as amended.

⁴ Jane L. David and Patrick M. Shields. *When Theory Hits Reality: Standards-Based Reform in Urban Districts*. SRI International for Pew Charitable Trusts, August 2001.

The Goals of the District Accountability Framework

The goals of the District Accountability Framework are to:

- establish a transparent districtwide accountability process that applies to all district schools – district-managed, contract, and charter;
- ensure compliance with federal- and state-mandated accountability processes, and extend federal and state support, intervention, and corrective action requirements to include non-Title I schools;
- ensure systematic and rigorous support for struggling schools, and provide for recognition of schools that continue to raise the performance of all students and close achievement gaps;
- establish annual expectations for school progress and performance, and ensure that each school’s educational community is responsible and accountable for meeting those expectations; and
- clearly communicate and consistently apply criteria for rewards and sanctions, including a timeline that outlines the consequences associated with failing to meet performance targets for multiple years.

The Structure of the District Accountability Framework

The proposed District Accountability Framework has five main components.

1. **School Performance Indicators**: As required by federal and state law, the district will use the Academic Performance Index, as defined by California’s *Public School Accountability Act*⁵, and the Adequate Yearly Progress measures, as defined through *No Child Left Behind*⁶, as the performance indicators for the district accountability process.
2. **School Classification System**: Each year, schools will be classified in terms of their performance and progress using a matrix adapted from one proposed by the California Department of Education (CDE) in connection with completion of the *California NCLB Accountability Workbook*. This classification system incorporates both API targets and AYP goals and objectives, and will facilitate an annual review of each school’s current achievement status. **Attachment B** provides the proposed *School Classification Matrix*. **Attachment C** (*Sample School Accountability Classifications: 2003*) provides a listing of district schools, by “star” level, based on 2003 AYP and Growth API data. [Note: Attachment B is for information only. School classifications will not be formally generated/used for district accountability purposes until fall 2004.]
3. **District Accountability Strategies**: The accountability framework includes strategies to address needs and issues at schools across the achievement spectrum.
 - **Rewards and Recognition**: High-performing schools will be publicly recognized and/or rewarded for their academic performance. In addition, “five-star” district-managed schools will have the opportunity to apply for increased site-level flexibility via a Board-approved MOU.
 - **Monitoring and Support**: Schools that are generally making progress and/or meeting some performance expectations will be monitored, and appropriate support will be provided by the appropriate oversight entity (e.g., for district-managed schools, the Office of Instructional Support). The focus and intensity of the support provided to each school will be consistent with the areas of need identified in an analysis of the school’s API and AYP results.

⁵ SB1X, 1999; California Education Code, 52050-52055.660.

⁶ Public Law 107-110, 2002.

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- Intervention and Corrective Action/Sanction: Consistent with federal and state law, schools that are not meeting goals and targets will receive intervention and, if needed, engage in a corrective action process consistent with that required under state and federal law. District (and/or the supervisory/governance parties at each contract and charter school) and school site staff will analyze school accountability and achievement results to identify areas of specific need, and intervention and corrective action will be targeted to focus on those needs. Schools that improve will exit the corrective action phase. Schools that do not will be subject to restructuring and/or closure.

A chart outlining these strategies is provided in **Attachment D**. Further detail will be included in the final report to the Board of Education in early 2004.

4. School Accountability Agreements: At district-managed schools, the principal and instructional leader at each school will sign an annual accountability agreement that delineates the performance expectations, potential rewards and sanctions, and roles and responsibilities associated with the district accountability process. The signed agreement indicates that the participants accept accountability for improving student achievement and meeting state and federal improvement targets – and understand the rewards and sanctions contained in the District Accountability Framework. Each school’s School Site Council (SSC) chairperson and Site Governance Team (SGT) chairperson will also sign the document to indicate that the SSC and SGT have reviewed and discussed the School Accountability Agreement and understand the school’s academic achievement goals. Similar agreements will be signed by principals/contractors and appropriate supervisory/governance parties at all contract schools and charter schools. Draft versions of the School Accountability Agreement for district-managed, contract, and charter schools can be found in **Attachment E**.
5. Program Improvement Timeline: Consistent with federal and state program improvement requirements, the District Accountability Framework provides for a review of each school’s progress and performance at the conclusion of each accountability cycle (i.e., following the release of the AYP results and Growth API reports each fall). Federal law requires that any Title I school failing to make AYP for two consecutive years be identified for Title I Program Improvement. The NCLB Program Improvement Timeline, which mandates increasingly proscriptive interventions, corrective actions, and sanctions for schools that do not improve, is provided in **Attachment F**. The District Accountability Framework proposes to apply the NCLB Program Improvement Timeline to all district schools, whether or not they are Title I schools. As a result, all schools will (1) be held to the same standards of achievement and (2) be subject to the same interventions, corrective actions, and sanctions – as defined by federal and state law.

Any school in program improvement that fails to make AYP in a given year advances one level on the Program Improvement Timeline. If a school makes AYP in a given year, it remains at the same level on the timeline; if a school makes AYP for two consecutive years, it exits Program Improvement. Note: Because it is possible for a school at any performance level (e.g., a “four-star” school) to be in Program Improvement, the interventions, corrective actions, and sanctions specified on the Program Improvement Timeline will apply, as appropriate, to that school, based on the circumstances calling for improvement. Therefore, a “four-star” school (i.e., “recognition” school) will be recognized by the district for its progress and performance during the annual accountability

cycle – but will be subject to suitable actions associated with its Program Improvement status (e.g., unsatisfactory sub-group performance).

The Implementation Timeline of the District Accountability Framework

A School Accountability Agreement will be generated for every district-managed school, contract school, and charter school annually. The contract will be signed by the appropriate parties at each school (e.g., principal and instructional leader at district-managed schools) and reviewed and discussed by each site's SSC and SGT (or corresponding supervisory/governance group(s) at contract schools and charter schools) by October 31st of each year. The completed contract (signed by the SSC and SGT chairpersons or, in the case of contract/charter schools, the appropriate supervisory/governance group, to indicate community notice) must be submitted to the district by November 15th. The district accountability process, based on the School Classification Matrix and supported by the District Strategies Chart, will be applied for the first time in fall 2004 following release of the 2004 AYP and the 2003-04 Growth API results.

Instructional Implications

The district's mission is to improve student achievement by supporting teaching and learning in the classroom. The District Accountability Framework places the locus of accountability at the school level, while delineating districtwide strategies to recognize schools that are successfully improving achievement and to support and intervene with those that are not. Instructional improvement is essential to an effective accountability process. Each district-managed school, with direction and assistance from the Chief Academic Officer and the Instructional Leader, must analyze student performance data, identify priorities for instructional focus, and provide both general and targeted support for teachers and students. For schools with pilot status, these activities will be the responsibility of those parties identified in the school's MOU. For charter schools, these activities will be the responsibility of the charter Governing Board.

Budget Implications

There are no immediate budget implications associated with this report. As the intervention and corrective action strategies are phased in, staff will analyze school needs and bring forward any related implications for the allocation of new or the reallocation of existing resources. Under Title I, the district must set aside funding to support Program Improvement schools. Other state and federal programs (e.g., the High Priority Schools Grant Program) also provide resources to support interventions at the lowest achieving schools in the state.

Facilities Implications

There are no immediate facilities implications associated with this report.

Public Support and Engagement Implications

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The educational community has a vested interest in student and school performance. As such, the district accountability process must be conducted in a public setting. Each school's accountability agreement and site plan are public documents and should be shared at the school site and district level. The Board of Education will discuss school performance and the associated accountability findings several times a year as state test results, Adequate Yearly Progress, and Academic Performance Index data are available for analysis and reporting.

Under Title I, the district is required to inform parents and the public about the corrective actions identified for schools in Year 3 of Program Improvement, and provide an opportunity for comment. To meet this requirement, schools will hold site meetings and the district will notice a public hearing at a Board of Education meeting.

Following the first reading of the proposed District Accountability Framework, district staff embarked on a series of communications and community outreach efforts to provide information about the framework to staff, parents and the community. These efforts included:

- creation of a special section on the district's website with information about the District Accountability Framework at http://www.sandi.net/depts/saa/dist_accountability.html;
- development of a PowerPoint presentation and a fact sheet (English/Spanish) for use by district staff and site administrators;
- publishing information regarding the District Accountability Framework for staff in the April 21, 2004 Staff Bulletin (http://sandi.net/staff/staffbull/4_21_04/index.html) and April 19, 2004 Operations Update (http://www.sandi.net/staff/ops_update/040419.pdf);
- presenting information to charter school principals (December 5, 2003) and reminders at all charter school principal meetings (January 15, February 5, March 9, and April 20, 2004);
- briefing of principals at the March 11, 2004 principals' conference;
- requesting that principals share the information with their school communities and provide feedback on any major questions, comments, concerns, or issues via their Instructional Leaders;
- presenting information at the March 11, 2004 Parent Congress;
- presenting information at the December 17, 2003 District Advisory Council meeting;
- presenting information at the June 1, 2004 District English Learner Advisory Committee meeting;
- the Superintendent's April 2004 parent letter;
- presenting information at the Parent Communications and Involvement Workgroup on April 22, 2004;
- presentations were offered, but not scheduled with the PTA Council, Special Education Community Advisory Committee, and the GATE District Advisory Committee.

In general, parents and community members supported the district's efforts to combine the "status-driven" federal measure of accountability (AYP) and the "progress-driven" state measure of accountability (API) to generate a more comprehensive view of each school's strengths and challenges. While specific feedback about the District Accountability Framework was limited, a few parents expressed concerns that the "star chart" might be the only tool used by parents to select a school for their child. They stressed that a school's "star rating" should be only one of the criteria used to determine the overall quality of a school. As a result of this community concern, informational materials will be prepared to assist parents in understanding the range of assessment and accountability reports generated by the federal and state departments of education and the district.

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The District Accountability Work Group was reconvened on May 12, 2004 to discuss and approve the draft framework prior to the Board of Education's second reading on June 8, 2004. Following board action, materials regarding the framework will be updated (e.g., fact sheet, website, parent letter) and provided to sites and parent organizations to use at their discretion.

Board Policy Implications

District Policy #F-7030 must be revised to reflect the District Accountability Framework proposed in this report. The following revised policy is proposed for Board of Education approval:

It is the policy of the San Diego City Schools to be accountable for the educational achievement of all its students. The school district demonstrates its commitment to this policy through a mutual accountability system that applies equitably to district-managed, charter, and contract schools. Each school is held accountable for improving the achievement of all students as measured by state academic standards. Each school also is required to integrate accountability into its existing planning processes. The district administration and central office staff are required to provide school sites with the appropriate information and resources to enable students to meet state standards of achievement.

Policy Recommendations

The Superintendent recommends that the Board of Education approve revised policy (F-7030) and the District Accountability Framework for districtwide implementation beginning with the 2004-05 academic year.

Attachments

- A. District Accountability Work Group
- B. School Classification Matrix
- C. Sample School Accountability Classifications: 2003
- D. Accountability Strategies Chart
- E. School Accountability Agreements
- F. Title I Program Improvement Timeline

Report prepared by staff from the Office of the Superintendent and the Office of Instructional Support.