

# Integration of State and Federal Accountability Programs

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LEGISLATIVE ANALYST'S OFFICE

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## Major Features of the Public Schools Accountability Act

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- ✓ **Academic Performance Index (API)**
  - Ranks schools in deciles 1 through 10 based on results from student assessments.
- ✓ **Governor's Performance Awards**
  - Provides rewards to schools that improve their API scores annually (if funded in the budget).
- ✓ **Intervention Programs**
  - Immediate Intervention for Underperforming Schools Program (II/USP) for schools in deciles 1 through 5 not meeting API targets.
  - High Priority Schools Grant Program (HPSGP) for lowest-performing schools starting with API decile 1 (added to Public Schools Accountability Act in 2001).
- ✓ **Sanctions**
  - Sanctions schools in II/USP and HPSGP that do not make their API growth targets.
  - Sanctions range from assigning an intervention team to closing the school.

- State system focuses on growth in overall student achievement from year to year.
- Interventions targeted at school level.
- School districts have limited formal role.



## Major Features of No Child Left Behind (NCLB) Accountability Requirements

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### **One Integrated State and Federal Accountability System**

#### **Adequate Yearly Progress (AYP)**

- ✓ Requires schools to meet annual objectives so all students reach proficiency by 2013-14.

#### **Rewards**

- ✓ Requires states to provide monetary and/or nonmonetary awards for making AYP.

#### **Program Improvement—Intervention and Sanction Programs**

- ✓ **Level 1—School Choice**
  - Develop a two-year improvement plan.
  - Use 10 percent of Title I funds for professional development focused on school improvement.
  - Provide students with the option to transfer to any other school in the school district and pay the transportation costs.
- ✓ **Level 2—Supplemental Services**
  - Level 1 interventions.
  - Use Title I funds to obtain tutoring/after school program from State Department of Education (SDE) approved public or private provider.
- ✓ **Level 3—Corrective Action.** Level 1 and 2 interventions, plus school district must do one of the following:
  - Replace responsible staff.
  - Implement new curriculum.
  - Significantly decrease management authority at school level.
  - Appoint an external expert to advise school.
  - Extend school day or school year.
  - Restructure internal organization of school.
- ✓ **Level 4—Restructuring.** Level 1, 2, and 3 interventions, plus prepare a plan that must be implemented within one year. Options include:
  - Reopen school as charter school.
  - Replace most of the school staff.
  - Hire private management company to operate school.
  - Turn the operation over to SDE.
  - Other major restructuring.



## Comparison of State and Federal Accountability Programs

Item	State		Federal	
	II/USP	HPSGP	CSRD	Program Improvement
<b>Number of schools</b>	1,287	562 approved 86 pending	196	814
<b>Eligibility</b>	Bottom 5 deciles	Bottom 5 deciles—only decile 1 funded to date	Competitive grant process primarily for Title I schools	Title I Schools
<b>Entry criteria</b>	Fail API for one year	Not Applicable	Not Applicable	Fail AYP for two years
<b>Planning funds</b>	\$50,000 grant	Optional \$50,000 grant	No grant	No grant
<b>Plan requirements</b>	22 specific requirements	All II/USP requirements plus four additional requirements	11 specific components. Must use research-based model	Research based plan
<b>Intervention year 1</b>	Implement action plan—\$200 per pupil	Implement action plan—\$400 per pupil	Implement action plan—\$200 per pupil	Intra-district choice
<b>Intervention year 2</b>	Implement action plan—\$200 per pupil	Implement action plan—\$400 per pupil	Implement action plan—\$200 per pupil	Choice and supplemental services
<b>Intervention year 3</b>	Exit, sanctions, or significant growth and \$200 per pupil	Implement action plan—\$400 per pupil	Implement action plan—\$200 per pupil	Choice, supplemental services, corrective action by school district
<b>Intervention year 4</b>	Continue sanctions	Exit, sanctions, or significant growth at \$400 per pupil.	If part of II/USP or HPSGP, exit, sanctions, or significant growth	Plan for restructuring
<b>Intervention year 5</b>	Continue sanctions	Continue sanctions	Continue sanctions	Restructuring
<b>Exit criteria</b>	Meet growth targets two years in a row	Not specified	II/USP or HPSGP exit criteria apply if under those programs	Make AYP two consecutive years
<b>Sanctions funding</b>	\$150 per pupil, \$75,000 to \$125,000 for School Assistance and Intervention Teams	Not specified	II/USP or HPSGP sanctions apply if under those programs	Title I 2 percent School Improvement set-aside provides funding for LEAs to support PI schools.



## Universe of Low-Performing Schools In State and Federal Programs

Program	Number of Schools
Federal Program Improvement only	289
II/USP only	690
HPSGP only	239
CSRDa only	18
PI <sup>b</sup> and II/USP	213
PI and CSRDa	17
PI and HPSGP	101
PI, II/USP, and HPSGP	131
PI, II/USP and CSRDa	34
PI, CSRDa, and HPSGP	12
II/USP and CSRDa	61
II/USP and HPSGP	111
HPSGP and CSRDa	7
II/USP, CSRDa, and HPSGP	30
PI, II/USP, CSRDa, and HPSGP	17
<b>Total</b>	<b>1,970</b>

<sup>a</sup> Comprehensive School Reform Demonstration.  
<sup>b</sup> Program Improvement.

- As of April 2003, there are 1,970 low-performing schools in state and federal programs, including 86 potential schools for High Priority Schools Grant Program (HPSGP) cohort 2.
- 734 schools are in more than one intervention program.
- Integrating accountability programs would reduce duplication of effort and contain costs and create a more consistent and coherent accountability system.



## Problems With Existing Two Accountability Systems

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- The Academic Performance Index (API) and the Adequate Yearly Progress (AYP) measure different goals. Using them together creates confusion.
  
- Multiple intervention programs create mixed messages.
  
- Cost of continuing duplicative programs high.
  - Multiple interventions will be at the same schools.
  - Large number of schools will enter Program Improvement (PI) in the next few years.
  - Number of schools sanctioned by the Immediate Intervention for Underperforming Schools Program (II/USP) estimated to increase from 24 in 2002-03 to 100 in 2003-04 and 230 in 2004-05.
  
- NCLB creates unrealistic standards.
  - Large number of schools will be identified as low-performing.
  - State definition of proficiency too stringent.



## Framework for an Integrated Accountability System

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- Focus state interventions at the school district level.
  - State does not have sufficient capacity to intervene at school level at a large number of schools.
  - NCLB makes school districts responsible for school interventions.
  - State can help school districts build capacity with direct support and interventions through the Statewide System of School Support.
  - NCLB makes the state responsible for interventions at school districts.
  
- Target state interventions at the neediest schools.
  - Many schools will fall under PI in the next few years.
  - It is important to target state-level interventions at only the neediest schools because of capacity constraints.
  - State should intervene in both Title 1 and non-Title 1 schools.
  - We recommend intervention in decile 1 of the API while the State Department of Education suggests basing the level of interventions on a school classification matrix.
  
- Provide less intensive interventions at higher-performing schools.
  - Many schools above API decile 1 will fall under PI.
  - Interventions for these schools should be handled at the district level and should be less intensive than interventions for decile 1 schools.
  - State can provide assistance to these schools through the Statewide System of School Support.



## Framework for an Integrated Accountability System

*(Continued)*

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- Redesign HPSGP to serve both state and federal purposes.
  - Phase out II/USP and align HPSGP with NCLB.
  - Provide funding for decile 1 schools—both Title 1 and non-Title 1.
  - Make planning requirements uniform.
  - Provide funding for a specific number of years and end use of significant growth as a trigger for additional funding.
  - Modify timing and types of sanctions to coincide with those required by NCLB for corrective action and restructuring.
  - Assign HPSGP schools in corrective action a school support team, which is similar to state School Assistance and Intervention Teams.
  
- Transition schools in state intervention programs to new system expeditiously.
  - Align the timing and types of sanctions for II/USP and HPSGP with NCLB as soon as possible.
  - Be careful to follow through with original sanction commitments to maintain credibility.
  - End use of significant growth as a criterion for additional funding.
  - Unresolved issue—should the state use API or AYP for schools already in state intervention programs?



## Framework for an Integrated Accountability System

*(Continued)*

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Change definition of proficiency to reflect being on track to pass the California High School Exit Exam (CAHSEE).

- The state has defined passage of CAHSEE as a goal for all students.
- State Board of Education has defined proficiency for NCLB purposes as scoring at the proficient or advanced levels on California Standards Tests.
- These performance levels were designed for students on track to go to the University of California or the California State University—only one-third of students score at these levels.
- Changing the definition of proficiency as being on track to pass the high school exit exam will set a more reasonable expectation for students and will slow the rate schools enter program improvement.



## Funding for Restructured Accountability System

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- We recommend setting aside \$50 million in Proposition 98 funds for a restructured accountability system in 2003-04.
  
- State accountability programs underfunded.
  - II/USP is underfunded by approximately \$27 million.
  - HPSGP is underfunded by \$31.1 million, assuming 86 new schools begin funding in 2003-04.
  - If no new HPSGP schools are funded, HPSGP is underfunded by \$6.4 million.
  
- State could save approximately \$32 million if it does not fund significant growth for schools in II/USP cohort 2.
  
- Federal funds supporting intervention and sanction programs.
  - Federal funds from Title I set-aside for PI.
    - \$29.1 million in 2003-04.
    - \$15 million carryover from 2002-03.
  - \$40 million in federal CSRD funds for school-level interventions.