

## Evaluating State Accountability Systems Under the ESEA

### Module 1: Theory of Action

All states have developed or revised their state’s accountability systems in response to requirements in the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESEA). A state’s accountability system includes multiple indicators, each of which illuminates a different facet of school performance or quality and might also communicate, for example, performance levels at the indicator level (e.g., percentage of students scoring proficient on state assessments is “below-average,” “meeting,” or “exceeding”) or annual ratings of overall performance (e.g., A–F grades, 1–5 stars). Results from a state’s accountability system are used to identify schools that require support or merit recognition; help direct resources to improve outcomes for all students; and communicate performance to parents, advocates, and the community about school performance. Ultimately, these actions are intended to improve student outcomes.<sup>1</sup>

Exactly *how* a policy is intended to change behavior and improve outcomes is described in a theory of action.<sup>2</sup> A theory of action is a logical argument of how a policy is intended to work; specifically, it is the logical sequence of steps and policy mechanisms that collectively influence one another to result in the long-term objective of the policy in question. If the stated purpose of the policy is the **why**, the theory of action depicts the **how**. Many states have already developed a working theory of action as part of their consolidated state plans, which may be treated as a living document that guides communication with stakeholders over the course of implementation.

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<sup>1</sup> For more information on accountability system design and implementation, please see the resource [An Introduction to Accountability Implementation: A Preface to the Operations, Performance Standards, and Evaluation Resources](#) from the Council of Chief State School Officers (CCSSO). Please note: The inclusion of links to resources and examples do not reflect their importance, nor is it intended to represent or be an endorsement by the Department of any views expressed or materials provided. The U.S. Department of Education does not control or guarantee the accuracy, relevance, timeliness, or completeness of any outside information included in this document.

<sup>2</sup> A theory of action may also be referred to generally as a theory of change, logic model, or by other terms. Although there are some differences between these terms, they are often used interchangeably in practice.

*This module is part of the [Evaluating State Accountability Systems Under the ESEA tool](#), which is designed to help state educational agency (SEA) staff reflect on how the state’s accountability system achieves its intended purposes and build confidence in the state’s accountability system design decisions and implementation activities.*

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SEA staff can use a theory of action to do the following:

- Communicate about the state’s strategy for improving school performance and student outcomes.
- Communicate about how the state’s accountability system (and related state policies, programs, and initiatives) support improving school and student outcomes.
- Consider how SEA staff time and expertise need be leveraged to fully implement the policy demands of the state’s accountability system.
- Determine how to best allocate resources to implement the state’s accountability system and support school improvement.
- Review the degree to which the state’s accountability system is working as intended.
- Inform potential adjustments or mid-course corrections to the state’s accountability system (if the system is not functioning as intended).
- Evaluate impact of the state’s accountability system on school improvement.

For states with an existing theory of action (e.g., one developed as part of the consolidated state plan), this module can help SEA staff ensure that the linkages within the theory of action are well-articulated and accurate, and where they are not, the module can help states revise their theory of action as appropriate. For states that do not have an existing theory of action, this module can help SEA staff reflect on the intents, actions, and intended outcomes that should be included in their theory of action.

This module includes two sets of self-reflection prompts that are intended to support SEA staff’s description and reflection on the theory of action guiding the state’s accountability system. These two sets of reflection prompts are not intended to be discrete; instead, they are intended to work together to help you answer questions in the next sections of this module.

**Table 1. Overview of Module 1: Theory of Action**

Section	What is it?	Why is it important?	How should it be used?
Section 1. Articulate the Theory of Action of the State’s Accountability System	A description of how the different components of the policy fit together in a logical way lays the foundation for accomplishing the policy objective.	Articulating the theory of action behind the state’s accountability system can help develop a message that can be used for multiple audiences to describe the “how,” “what,” and “why” behind the state’s accountability system.	The <b>theory of action</b> for the state’s accountability system asks you to describe the expected policy objective, behavioral intent, and intermediate outcomes, which will serve as a reference point for other modules of this tool. This will also help determine whether other components of the state’s accountability system align with and support the broader theory of action.

Section	What is it?	Why is it important?	How should it be used?
Section 2. Assess Confidence in the Accountability Theory of Action	Based on your description of the theory of action, an examination of your level of confidence can determine whether theoretical linkages are sound and evidence supports your assumptions.	Determining your overall confidence in the soundness of the theory of action can help you determine where to collect evidence, make system revisions, or develop outreach materials.	The <b>confidence claims</b> will help you identify potential evidence that can help confirm soundness of the theory of action.

## Evaluating State Accountability Systems Under ESEA

### Module 1: Theory of Action

#### Section 1: Articulate the Theory of Action of the State's Accountability System

A theory of action is often described in terms of inputs and resources, activities, outputs, and outcomes. SEA staff involved in developing state plans can also describe the mission, leading indicators, intermediate outcomes, objectives, and contextual constraints in the theory of action.

Often, a theory of action is depicted in a graphical format because some people find the visual helpful to understand how the pieces fit together. Rather than starting with a visual depiction, you might consider first drafting the theory of action in a narrative format. High-level theories of action are commonly described using a series of “if... then” statements. For example, “If we [enact policy X], then [stakeholders/students] will be able to [change behavior Y], which will help [stakeholders/students do Z].” Articulating a theory of action via narrative can tell the story of what you hope to accomplish, and how, in an easily understandable way. For more information on a theory of action and its components, please see the [resources from the Pacific Regional Educational Laboratory on logic models](#).

As you start to document your theory of action, begin with the fundamental design components of the state's accountability system and the broad objectives you hope to accomplish. Use the reflection questions in the following table to develop, revise, or confirm the high-level description of components of the state's accountability system theory of action.

**Table 2. Articulate the Rationale Behind the State's Accountability System**

Articulate the Rationale Behind the State's Accountability System	
Reflection Questions	Notes
<p><b>Policy intent:</b></p> <p>What policy objectives are you trying to achieve through the state's accountability system as a whole? How does this policy intent drive school differentiation, capacity-building, and public engagement? Examples may include the following:</p> <ul style="list-style-type: none"><li>• Increasing achievement of all students to a specific threshold</li><li>• Ensuring all students graduate from high school prepared for college or careers</li><li>• Remediating persistent achievement gaps between historically disadvantaged subgroups and other subgroups</li></ul>	

Reflection Questions	Notes
<p><b>Policy mechanisms or levers:</b> Based on your policy intent, what are the specific policy mechanisms or levers that will promote this larger objective? These should include ESEA-required accountability components but may be framed in ways that are consistent with your state objectives and needs. Examples may include the following:</p> <ul style="list-style-type: none"> <li>• Differentiation of schools that have high rates of chronic absenteeism</li> <li>• An indicator of school quality or student success that focuses on college- and career readiness (e.g., industry credentialing, biliteracy certification, Advanced Placement/International Baccalaureate® coursework credit earned by all 12th graders)</li> <li>• A statewide system of support that empowers local staff and stakeholders</li> </ul>	
<p><b>Behavioral intent:</b> What behaviors are the policy mechanisms or levers intended to incentivize? This may include behaviors for policymakers, state staff, district leaders, principals, educators, students, and the public. Examples may include the following:</p> <ul style="list-style-type: none"> <li>• Supports for comprehensive literacy instruction</li> <li>• Increased awareness of the needs of English learners</li> <li>• Interventions to promote consistent attendance</li> </ul>	
<p><b>Expected outputs:</b> What expected outcomes does your state expect the state's accountability system to foster? These should ultimately support the broader policy intent. Examples may include the following:</p> <ul style="list-style-type: none"> <li>• Improved math instruction</li> <li>• Improved ratio of college counselors to students</li> <li>• Effective district use of accountability data to support schools</li> </ul>	
Articulate the Rationale Reflection Questions	Response
Reflecting on your notes above, consider whether the rationale behind the state's accountability system is clearly and sufficiently articulated in the theory of action.	
The state's accountability system is clearly and sufficiently articulated in the theory of action.	Yes/No

After you have described the system components and interdependencies in a narrative format, it may be helpful to create or update the theory of action using a graphic format. There is no “right” approach to you how you map this out visually. It might be helpful to show the expected relationships in a linear format, but others might feel that a cyclical format better represents a dynamic policy process. For a complex state’s accountability system, the theory of action may similarly need to be more complex to reflect the full spectrum of policy implementation issues.

**Evaluating State Accountability Systems Under ESEA**  
**Module 1: Theory of Action**  
**Section 2: Assess Confidence in the Accountability Theory of Action**

The following self-reflection prompts provide a state with the opportunity to consider whether the theory of action that describes the state’s accountability system is sufficiently sound to anchor the system as a whole and whether there is sufficient basis to conclude that the policy intent is likely to be achieved. The following claims, considerations, and examples of evidence are presented to help determine whether states can be confident that the system as a whole is likely to work together as intended.

Respond to the following prompts to reflect on your confidence in your state’s the accountability theory of action:

1. Read the claim, considerations, and evidence generated through key evidence checks.
2. Examine the specific evidence available in your state. Reflect on whether you believe you have collected enough evidence to be confident in the claim stated or whether there is a need for further examination.
3. Finally, respond to questions at the end of each claim that ask whether you (a) have sufficiently explored the confidence claims and (b) believe that you have collected enough evidence that these claims can be confirmed. Some questions may be based on opinion, whereas others will require an examination of data, supplemental analyses, or conversations with other staff at your SEA.

**Table 3. Assess Confidence in the Accountability Theory of Action**

<b>Claim 1: The individual components of the theory of action for the state’s accountability system are clear and practicable.</b>	
<i>For each consideration, consider the following statements and explore the suggested evidence that supports your state’s theory of action.</i>	
<b>Consideration 1.1:</b> Each of the components of the theory of action is well-defined, including the inputs and outputs.	
Reflection Prompts	Notes
<b>Key questions:</b> How understandable are the components of your theory of action? Can individuals or entities be assigned to each component?	
<b>Why is it important?</b> If roles, responsibilities, and expected outputs are not clear in the theory of action (or, if no specific individuals or entities are assigned to them), it is less likely that individuals and entities will enact the expected behaviors. However, we recognize it is not possible to detail every aspect of a theory of action without it becoming unwieldy. Discuss the appropriate “grain size” for the theory of action that works for your state.	

Reflection Prompts	Notes
<b>Key evidence checks:</b> <ul style="list-style-type: none"> <li>Review whether the language across the theory of action can be universally understood by educators and staff.</li> <li>Determine whether the language across the theory of action that refers to SEA resources, processes, policies, and outcomes aligns with state and local language.</li> <li>Determine whether the theory of action includes activities without specified individuals or entities to carry them out. In addition, consider whether any individuals or entities are over-represented beyond their actual capacity to conduct assigned activities.</li> </ul>	
<b>Potential next steps:</b> <ul style="list-style-type: none"> <li>Better define the anticipated inputs or outputs so that key actors can understand what they should accomplish for the theory of action to work as planned.</li> <li>Identify individuals or entities who can be assigned to different components of the theory of action.</li> </ul>	
<b>Consideration 1.2:</b> <u>Educators and staff are prepared or have access to needed resources and training to enable the theory of action to function as designed.</u>	
Reflection Prompts	Notes
<b>Key questions:</b> Are the appropriate materials for supporting the state's accountability system ready and available? Are there avenues through which stakeholders can access resources or attend trainings?	
<b>Why is it important?</b> State accountability systems cannot stimulate the intended behaviors and outcomes if actors do not have sufficient resources, knowledge, and skills.	



Reflection Prompts	Notes
<p><b>Key evidence checks:</b></p> <p>Please consider the following evidence checks for each component in the theory of action as well as the overall theory of action:</p> <ul style="list-style-type: none"> <li>• Consider whether the theory of action is viable in resource-rich as well as resource-limited districts in your state, including appropriate next steps.</li> <li>• Consider whether supporting materials (e.g., manuals, software, websites) are in place and whether resources (e.g., curricula, learning materials, hardware) are sufficient to help people understand the role they play in a broad conceptualization of the theory of action (from school designations through supports and interventions for improvement).</li> <li>• Consider whether available resources are equitably distributed and sufficient across all districts, schools, and students to support the theory of action. Is the educator preparedness level sufficient and equitably distributed across schools to support the theory of action?</li> <li>• Determine what skills, experience, and preparedness are necessary to understand the decisions required in the theory of action. Do educators and staff have the required skills and experience to enact the next steps that are expected of them?</li> <li>• Determine whether educators and staff have access (e.g., attainable and not cost-prohibitive) to the necessary information to inform their decision making and actions and whether it is available in a useful format.</li> <li>• Determine whether there is support (e.g., training, coaching) in place to ensure that educators and staff can implement the component.</li> </ul>	

Reflection Prompts	Notes
<p><b>Potential next steps:</b></p> <ul style="list-style-type: none"> <li>• Consult with other SEA colleagues, intermediary agencies, and federal resource centers to best leverage the supports available. Expectations regarding the impact of a state’s accountability system are likely to be unfulfilled in districts and schools with insufficient resources, whether in terms of materials, knowledge, or skills.</li> <li>• Consider what training is available to supplement educator skills, experience, and influence. This could include knowledge of the standards, ability to diagnose curricular gaps, and capacity to support school improvement team planning.</li> <li>• Many districts still suffer from serious hiring challenges. Consider how your state is supporting districts that have persistent shortfalls in terms of hiring teachers and school leaders.</li> </ul>	
<p><b>Consideration 1.3:</b> <u>The state’s data infrastructure and other organizational systems are sufficient to support, sustain, and scale each of the components in the theory of action.</u></p>	
Reflection Prompts	Notes
<p><b>Key questions:</b> Which offices in your SEA and which regional organizations support the components of the theory of action? Is the SEA collecting data necessary to inform steps in the theory of action? What protocols or systems support the flow of information?</p>	
<p><b>Why is it important?</b> The anticipated functioning of the theory of action is dependent on a robust infrastructure, just as it is dependent on personnel (see Consideration 1.2).</p>	

Reflection Prompts	Notes
<p><b>Key evidence checks:</b></p> <ul style="list-style-type: none"> <li>• Identify the data that are needed to inform and enact each component of the theory of action.</li> <li>• Determine whether the following are present to support the theory of action: <ul style="list-style-type: none"> <li>– Data systems are in place to inform actions associated with the theory of action; data are linked longitudinally and across platforms.</li> <li>– The necessary standard operating policies are established and in place.</li> <li>– The necessary inter- and intra-organizational partnerships are in place.</li> </ul> </li> <li>• Identify barriers within the SEA (and, if applicable, other state agencies) that are related to the exchange of information that can support the theory of action.</li> </ul>	
<p><b>Potential next steps:</b></p> <ul style="list-style-type: none"> <li>• Identify data needed but not yet available that are relevant to the theory of action to make components seem relevant and tangible. It is likely that different data and information will be required for different stakeholders within and across components so that they can relate it to their own work.</li> <li>• Identify any prerequisite systems or processes that can impede how actors should implement activities or inputs in the theory of action. For example, are any key policies or resources missing? If so, how do these impede data collection, progress monitoring of components, or partnerships? If policies or resources are in place, what is the next component that is missing (e.g., data collection, partnerships between offices, understanding of policies). Target high-impact systems, policies, or organizational links that have downstream impacts in the theory of action.</li> </ul>	

Claim 1 Reflection Prompts	Claim 1 Response
Reflecting on your notes above, consider your confidence in responding to the reflection prompts below. If you answer “no” or are not confident in your response, consider using <b>Module 2B: Indicator Interaction in the State’s System of Annual Meaningful Differentiation (AMD) and Modules 3A–3E: Indicators</b> to explore these topics in more depth.	
My state has sufficiently explored the input and activity components above to understand whether our accountability theory of action is practicable.	Yes/No
My state has collected enough evidence to assert that our accountability theory of action is practicable.	Yes/No

Claim 2: The linkages within the theory of action for the state’s accountability system are conceptually sound and practicable.	
<i>For each consideration, consider the following statements and explore the suggested evidence that supports your theory of action.</i>	
Consideration 2.1: Critical components and their linkages are represented, logically connected, and without critical gaps.	
Reflection Prompts	Notes
<b>Key questions:</b> <ul style="list-style-type: none"> <li>• Are the linkages in the theory of action based on research? Are there statistically significant correlations (where applicable)?</li> <li>• Are the linkages between inputs and outputs or outcomes based on state or local experience?</li> <li>• Are there conceptual gaps in key steps of the theory of action (e.g., from school identification to actions, and from actions to outcomes)?</li> </ul>	
<b>Why is it important?</b> The underlying premise of any theory of action should be sequential, logical, and grounded in evidence, whether that evidence is from experience or research. Without this justification, it is more difficult to conclude that the theory of action will play out as anticipated.	

Reflection Prompts	Notes
<p><b>Key evidence checks:</b></p> <ul style="list-style-type: none"> <li>• Critically examine each logical step in the theory of action. Provide a reasonable, evidence-based justification for why one step would lead to another.</li> <li>• Consult research reviews or meta-analyses to determine whether there is a sufficient research base to support an emphasis on the components highlighted in your theory of action.</li> </ul>	
<p><b>Potential next steps:</b></p> <ul style="list-style-type: none"> <li>• Add detail or provide support for the sequential steps in your theory of action. Where there are gaps, fill these in, both conceptually and in practice.</li> </ul>	
<p><b>Consideration 2.2:</b> Output and outcomes reflect the expected behaviors of educators, staff, and other key actors throughout the system.</p>	
Reflection Prompts	Notes
<p><b>Key questions:</b></p> <ul style="list-style-type: none"> <li>• Are useful data shared with key educators and staff to help motivate intended behaviors?</li> <li>• Are appropriate and strong incentives in place to drive behaviors? Are disincentives minimized?</li> <li>• Are educators supportive of the intended behaviors included in the theory of action? Are there any barriers that could prevent educators and staff from responding in good faith?</li> <li>• Are there other barriers created by institutional inertia?</li> <li>• Is the relationship described among inputs, outputs, and outcomes likely to occur similarly across all student groups? Are there additional linkages to consider based on student abilities or status?</li> <li>• Does the theory of action hold for schools of different sizes and settings (e.g., urban, suburban, rural)?</li> </ul>	

Reflection Prompts	Notes
<p><b>Why is it important?</b> Underlying the generic theory of action of accountability is the premise that the system will include elements that incentivize changes in behavior. If the system is not structured in a way that does so across variable settings, the promise of the policy will not be realized.</p>	
<p><b>Key evidence checks:</b></p> <ul style="list-style-type: none"> <li>• Critically examine any barriers to full execution of the theory of action, whether associated with regional variation, policy history, or resource allocation.</li> <li>• Probe the extent to which hypothesized incentives are meaningful for the actors they are intended to motivate. Diagnose where incentives may be less effective than anticipated.</li> <li>• Determine whether data are accessible to local administrators and educators and communicated in ways that enable them to make use of the data (also see <b>Module 2B: Indicator Interaction in the State’s System of Annual Meaningful Differentiation (AMD) and Modules 3A–3E: Indicators</b>).</li> </ul>	
<p><b>Potential next steps:</b></p> <ul style="list-style-type: none"> <li>• Take actions to reduce any barriers identified.</li> <li>• Enhance access to data and associated supports for interpreting data.</li> <li>• Address underlying circumstances that are limiting the effectiveness of incentives associated with accountability mechanisms.</li> </ul>	
<p><b>Consideration 2.3:</b> Potential, unintended consequences have been identified and minimized.</p>	
Reflection Prompts	Notes
<p><b>Key questions:</b></p> <ul style="list-style-type: none"> <li>• Are there potentially “negative” linkages or consequences that should be considered and accounted for in the theory of action?</li> <li>• How will educators and staff respond to various components of the theory of action? What are the implications of their responses?</li> <li>• Are there ways of “gaming the system” or distorting results that could significantly compromise the theory of action?</li> </ul>	

Reflection Prompts	Notes
<p><b>Why is it important?</b> Research on the implementation of states' accountability systems has documented frequent evidence of unanticipated consequences, such as gaming the system or focusing on a few "bubble students" whose performance may move the needle on school identification. These actions run counter to the broader policy intent of improving outcomes for all students.</p>	
<p><b>Key evidence checks:</b></p> <ul style="list-style-type: none"> <li>Because evidence of unanticipated consequences is difficult to identify until after the fact, challenge yourselves to consider whether the incentives associated with accountability mechanisms would prompt counterproductive actions, and what information or supports would avoid such actions.</li> </ul>	
<p><b>Potential next steps:</b></p> <ul style="list-style-type: none"> <li>Provide communication, data, or technical assistance that would enable local actors to embrace the spirit of the theory of action and not succumb to counter-productive actions.</li> <li>Put in place guardrails to help prevent counter-productive actions.</li> </ul>	
Claim 2 Reflection Prompts	Claim 2 Response
<p>Reflecting on your notes above, consider your confidence in responding to the reflection prompts below. If you answer "no" or are not confident in your response, consider using <b>Module 2B: Indicator Interaction in the State's System of Annual Meaningful Differentiation (AMD) and Modules 3A–3E: Indicators</b> to explore these topics in more depth.</p>	
My state has sufficiently explored whether the linkages within the theory of action are conceptually sound.	Yes/No
My state has collected enough evidence to assert that the linkages within the theory of action are conceptually sound.	Yes/No

**Claim 3: The theory of action will promote policy objectives aligned with state objectives.**

*For each consideration, consider the following statements and explore the suggested evidence that supports your theory of action.*

**Consideration 3.1: Objectives align with overarching state objectives and are coherent with local objectives and needs.**

Reflection Prompts	Notes
<p><b>Key questions:</b></p> <ul style="list-style-type: none"> <li>Does the theory of action promote the state’s objectives for: <ul style="list-style-type: none"> <li>Student achievement?</li> <li>College and career readiness?</li> <li>Attainment of postsecondary education, training, and/or employment?</li> <li>Attainment of a well-rounded education?</li> <li>Equitable access?</li> <li>School and student performance outcomes?</li> </ul> </li> <li>Do the objectives articulated within the theory of action reflect the documented objectives and needs of districts and schools?</li> <li>Does the state receive positive feedback on the theory of action objectives from local constituents?</li> </ul>	
<p><b>Why is it important?</b> Although some common themes shape educational objectives across states, each state’s unique context will shape the needs to be addressed through the theory of action. Accountability policies will resonate with local educators if state objectives are aligned with local needs.</p>	
<p><b>Key evidence checks:</b></p> <ul style="list-style-type: none"> <li>Gather input from a range of stakeholders (or revisit feedback from previous listening tours) to critically examine whether the theory of action is framed in ways that will support accomplishing state objectives and resonate with local educators.</li> <li>Review a sample of local needs assessments, local educational agency (LEA) consolidated plans, Title I plans, and school improvement plans to identify concerns and to assess alignment between state and local objectives.</li> </ul>	



Reflection Prompts	Notes
<b>Potential next steps:</b> <ul style="list-style-type: none"> <li>Consider modifications to the theory of action and associated mechanisms in your state’s approach to accountability in conjunction with lessons learned through other modules of this tool.</li> </ul>	
Claim 3 Reflection Prompts	Claim 3 Response
Reflecting on your notes above, consider your confidence in responding to the reflection prompts below. If you answer “no” or are not confident in your response, consider using <b>Modules 3A–3E: Indicators</b> to explore these topics in more depth.	
My state has sufficiently explored the confidence claims above to understand how the theory of action supports policy objectives aligned with state objectives.	Yes/No
My state has collected enough evidence to assert that the theory of action supports policy objectives aligned with state objectives.	Yes/No