

Evaluating State Accountability Systems Under ESEA

Module 6: Reporting

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 (ESSA). A state’s accountability system includes multiple indicators, each of which illuminates a different facet of school performance. The primary vehicle for reporting accountability data across these indicators is through annual state and local report cards. The focus of **Module 6: Reporting** is to explore how an SEA can utilize annual state and local report cards to support communication around the objectives of the state’s accountability system and the design of its system of annual meaningful differentiation (AMD).

As discussed in **Module 2A: State’s System of Annual Meaningful Differentiation (AMD)**, each state has some flexibility under ESEA around how school performance data are reported. Please see **Module 2A: State’s System of AMD** for more information on reporting school performance data.

The way in which information on a state’s accountability system is presented on state and local report cards should reflect the state’s theory of action and policy objectives of the state’s accountability system.¹ This module includes two sets of self-reflection prompts that are intended to address the following concepts around reporting. These two sets of prompts are intended to work together to help you answer questions throughout this module.

¹ For more information, see [Establishing Performance Standards for School Accountability Systems](#) from the Council of Chief State School Officers. 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.

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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Table 1. Overview of Module 6: Reporting

Section	What is it?	Why is it important?	How should it be used?
Articulate the Rationale for Reporting	A description of why state and local report cards and reporting approaches are designed the way they are	Documenting the reasoning behind the state and local report card design helps describe the “what” and “why” behind state and local report cards.	The rationale for reporting asks you to describe the expected policy objective, behavioral intent, and expected results associated with access and interpretation of state and local report cards. This rationale can be used as a point of comparison for examining state and local report card approaches. This will also provide a comparison for the next section.
Assess Confidence in Operations and Results of Reporting	An examination of your level of confidence that design decisions are sound and evidence supports your assumptions for reporting	Determining your overall confidence in the results and presentation of accountability information on state and local report cards can help inform future decisions such as where to make revisions or develop outreach materials.	The confidence in operations and results section will assist you in identifying potential evidence that can help confirm your rationale regarding how state and local report cards are designed and delivered.

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Module 6: Reporting

Section 1. Articulate the Rationale for Reporting

In **Module 1: Theory of Action**, you mapped the overall theory of action for the state accountability system; in **Module 2A: State's System of Annual Meaningful Differentiation (AMD)**, you considered the design, signals, and results of the AMD and how they support the overall theory of action. **Module 6: Reporting** asks you to think about how state and local report cards can support the theory of action and communicate the results of the system of AMD. Likewise, state and local report cards must include a clear and concise description of the state's accountability system. Consider the following questions regarding the rationale behind the design accountability information included on state and local report cards.

Table 2. Articulate the Rationale for Reporting

Articulate the Rationale for Reporting	
<i>Reflection Questions</i>	<i>Notes</i>
Policy intent: What is the policy objective that you are trying to communicate through the design of state and local report cards? What is being highlighted or prioritized in the state and local report cards, and why? How does this support your overall system theory of action?	
Policy mechanisms or levers: How are you facilitating access to state and local report cards, including information on accountability? How much scaffolding are you providing to the public as they engage with accountability information included on state and local report cards? Is accountability information on state and local report cards presented in a way that allows statewide comparisons, averages, or similar schools to support interpretations? How are you reducing barriers to accessing and acting upon information on accountability included on state and local report cards?	

<i>Reflection Questions</i>	<i>Notes</i>
<p>Intended use: What behaviors are you trying to incentivize based on the way information is presented on state and local report cards regarding accountability? How does reporting align with the system of AMD objectives (e.g., focus conversations on closing educational gaps or student growth)? How do these behaviors differ by stakeholder group (e.g., policymakers, state staff, district leaders, principals, educators, and the public)?</p>	
<p>Expected results: For state and local report cards, where do you expect people to access information? How frequently should reports be accessed and referenced? Is there supporting documentation or resources that you intend to provide and how frequently should these resources be used?</p>	

Evaluating State Accountability Systems Under ESEA

Module 6: Reporting

Section 2. Assess Confidence in Operations and Results of Reporting

Each component of a state’s accountability system should be well understood by all stakeholders. For many school-level stakeholders and the public, state and local report cards may be the first point of access for accountability data and component information. Likewise, accountability reporting can help the public, educators, and other key stakeholders better understand the meaning behind accountability data, which can reduce the risk of accountability data being misunderstood or misused. SEA staff can benefit from reflecting on how their reporting system reflects the design of their system of annual meaningful differentiation (AMD) and whether the information is likely to be understood by stakeholders.

SEA staff may use the following reflection prompts to consider whether the reporting system supports the underlying rationale of the overall state’s accountability system, as well as whether the SEA can be sufficiently confident that stakeholders and the public are likely to access and understand the accountability reports as intended. Respond to the following prompts to engage in the reflection around the operations and results of accountability reporting:

1. Read the claim, consideration, and potential sources of evidence.
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 that pose whether you (a) have sufficiently explored the confidence claims below 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 SEA colleagues.

Table 3. Assess Confidence in Operations and Results of Reporting

Claim 1: Reporting is designed to communicate the objectives and results of the accountability system with multiple users in mind.	
<p>One of the key requirements of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), is that a state will solicit feedback from key stakeholders to inform the development of its state plan, including the description of its accountability system. In addition, ESEA requires an SEA to consult with parents in the development of its annual state report card, which has important implications for ensuring accessibility of useful data by parents and other key stakeholders. Information needs vary by stakeholder group and should therefore be informed by representatives of those stakeholder groups to ensure accessibility, usability, and informational needs are met.</p> <p><i>For each consideration, review the key questions presented, and use the key evidence checks to help answer those questions.</i></p>	
Consideration 1.1: The design, development, and testing of state and local report cards reflect stakeholder engagement and input.	
Assess Confidence in Operations and Results	
Reflection Prompts	Notes
<p>Key questions for the indicator: Were parents consulted when state and local report cards were being designed? To what extent was feedback from parents and other stakeholder groups incorporated before, during, and after report development?</p>	
<p>Why is it important? Consulting with parents is not only a statutory requirement but also an important step in ensuring that state and local report cards provide understandable information in accessible ways to parents who will be interacting with different levels of accountability reporting.</p>	

Reflection Prompts	Notes
<p>Key evidence checks:</p> <ul style="list-style-type: none"> • Ensure that parents who represent the demographic composition of the state and strategic partners (e.g., advocacy groups, industry organizations, and appropriate minority councils) were identified and consulted. Determine the degree to which feedback was incorporated in accountability reporting and how data are accessed. • Determine whether parents and stakeholder groups consulted understand the degree to which their feedback was incorporated into report design and access. • Examine and evaluate evidence that captures parent reactions to state and local report cards and feedback mechanisms (e.g., focus groups, interviews, surveys) to help inform any necessary revisions. 	
<p>Potential next steps:</p> <ul style="list-style-type: none"> • Consider routinely updating parents, strategic stakeholders, organizations, or partners. By making clear the value of their feedback and contributions to improved reporting, they may become stronger allies of the state's accountability system and maintain their partnership over time. • Consider reconvening stakeholders to obtain additional feedback that can help inform revisions to reporting or how reports are accessed. 	
Consideration 1.2: Prioritize key information, particularly in light of expanded state and local report card requirements.	
Assess Confidence in Operations and Results	
Reflection Prompts	Notes
<p>Key questions for the indicator: How was parent and other stakeholder feedback balanced with operational constraints to develop state and local report cards and access options? How are informational displays prioritized to help meet stakeholder needs?</p>	

Reflection Prompts	Notes
<p>Why is it important? Stakeholder feedback may represent idealized or comprehensive requests that may not be feasible. These constraints can stem from data, policy, privacy, or access limitations. Balancing ideal and operational design is an important consideration to help stakeholders focus on key information, especially in light of expanded state and local report card requirements.</p>	
<p>Key evidence checks:</p> <ul style="list-style-type: none"> • Determine the extent to which stakeholder feedback was translated into high-priority informational displays and mechanisms to access state and local report cards. • Identify the extent to which groups or key stakeholder representatives received updates on the development and finalization of state and local report cards. 	
<p>Potential next steps:</p> <ul style="list-style-type: none"> • States are required to report on a wide variety of data reflecting school quality and access to educational opportunity. Based on stakeholder needs and the theory of action, high-impact information that communicates the objectives of the state’s accountability system should be prioritized. Consider following up with educators and the public to confirm that these objectives are being met through reporting and ease of access. • It may be beneficial to revisit stakeholder feedback over time to see how data access and informational reporting can be revised, improved, or expanded. This may include linking statewide accountability data with locally supported reporting efforts and communications. 	
<p>Consideration 1.3: <u>The state and local report card displays are designed for and target key audiences as intended.</u></p>	
<p>Assess Confidence in Operations and Results</p>	
Reflection Prompts	Notes
<p>Key questions for the indicator: What stakeholder groups are identified as key actors in the state’s accountability system? How are information displays and access to data differentiated by group?</p>	

Reflection Prompts	Notes
<p>Why is it important? Depending on the design and maturity of student-information systems, data access and information display design can vary greatly. Although role-specific access and information is critical to interpreting data and making information-driven decisions, consider state infrastructure and capacity to support how accountability audiences are targeted.</p>	
<p>Key evidence checks:</p> <ul style="list-style-type: none"> • Based on the theory of action, ensure that key actors that require educational data and information are identified by role and need. • Based on identified actors in the system, determine the extent to which role-specific access to accountability data and resources has been provided, while adhering to all requisite privacy requirements. • Review current and proposed operational reports to determine whether they meet the needs of identified stakeholder groups. 	
<p>Potential next steps:</p> <ul style="list-style-type: none"> • Ensure that the public sufficiently understands state conceptualizations of school quality based on the available data included on state and local report cards. This may be based on interviews, focus groups, or surveys of parent organizations or their members. • Based on a scan of key actors (e.g., parents, district leaders, principals, educators) and available data, evaluate whether adjustments to state and local report cards or supplementary information should be developed that would support their informational interest. • Determine whether key actors in the system (e.g., parents, district leaders, principals, educators) would benefit from enhancements to role-restricted reports that might facilitate deeper examinations of accountability data. 	

Claim 2: State and local report cards and reporting systems provide access to accurate data to support the AMD system.

Data and reporting quality are necessary, but likely insufficient, to help stakeholders access and use accountability results. It is critical to examine how processes and procedures that produce both the data and the reports themselves are of high quality, defensible, without error, and transparent. By confirming that data included on state and local report cards are accurate and without error, then strategies promoting the effective use and interpretation of data can be addressed.

For each consideration, review the key questions presented, and use the key evidence checks to help answer those questions.

Consideration 2.1: Data are available to stakeholders in a timely, accessible, and understandable way.

Assess Confidence in Operations and Results

Reflection Prompts	Notes
Key questions for the indicator: Have you identified key threats to the credibility of accountability data included on state and local report cards and how to address those threats?	
Why is it important? Some threats to the credibility of accountability reporting include inaccuracies in the data, lack of availability, obscured information, and missed timelines for availability. Addressing these threats can help promote trust in the accountability data and the state's accountability system as a whole.	
Key evidence checks: <ul style="list-style-type: none">• Ensure that timelines, production schedules, and hand-offs are identified, tracked, and checked throughout the development of data and report production.• Confirm that accountability data included on state and local report cards are available to specified audiences as designed and intended.• Ensure that information regarding accountability is defined clearly and consistently on state and local report cards.²	

² For more information, please see [Communicating Performance: A Best Practices Resource for Developing State Report Cards](#) from the Council of Chief State School Officers (CCSSO). 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.

Reflection Prompts	Notes
<p>Potential next steps:</p> <ul style="list-style-type: none"> • In addition to tracking timelines, production schedules, and release of state and local report cards, it is important that these are documented and available to the public. Enhancing transparency in the accountability processes can promote trust in the state’s accountability system. • Based on intended access and availability of state and local report cards, consider monitoring how state and local report cards are hosted, where they are displayed, and how the public and educators are accessing them. This may include use of web analytics; identifying the types of questions districts and schools are receiving from educators and the public; and referencing other qualitative data collected from the public, educators, and educational leaders. • Clearly describing information might include simplifying indicators, providing definitions for indicators and data, and providing additional context for users.³ • Making information consistent may require examining data across multiple systems that go beyond accountability data. It may be necessary to examine where data may be inconsistent (e.g., assessment and accountability reporting), why that might be, and how to interpret differences to build a common understanding around accountability data.⁴ 	

³ For more information, please see [Communicating Performance: A Best Practices Resource for Developing State Report Cards](#) from the Council of Chief State School Officers (CCSSO). 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.

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Consideration 2.2: Accountability data that are reported are calculated correctly and appropriately validated.⁵

Assess Confidence in Operations and Results

Reflection Prompts	Notes
Key questions for the indicator: What processes or procedures are in place to ensure that data are accurate and of high quality?	
Why is it important? If the accountability data included on state and local report cards are inaccurate, inaccessible to report designers and producers, or are not consistently developed, the quality and accuracy of reporting will suffer. Following and updating business rules that support the production of data are important steps in the report development process.	
Key evidence checks: <ul style="list-style-type: none">• Ensure that quality-control requirements for data production are defined, tracked, and checked throughout the development of data files that feed reports.• Ensure that business rules are developed, followed, and updated for data files that are associated with or feed into accountability reporting (e.g., assessment data, attendance and absenteeism rates, subgroup identifiers).• Determine who is responsible for cleaning data, testing code, reviewing results, conducting replication analyses, and validating results. Review data development milestones, and ensure that “sign-offs” are documented.	

⁵ For more information, please see [Where the Rubber Meets the Road: Operations and Quality Control in School Accountability Systems](#) from the Council of Chief State School Officers. 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.

Reflection Prompts	Notes
<p>Potential next steps:</p> <ul style="list-style-type: none"> • In addition to tracking business rules, quality control requirements, and ownership of calculation, it is important that these are documented and available to the public. Enhancing transparency in developing accountability data can promote trust in the state’s accountability system. • Consider providing sample data, accountability data code, or calculators (e.g., Microsoft Excel templates, calculation websites) that can be used to help districts and schools understand the production of data files. • It will be important to ensure that any changes or updates to business rules or processes are consistently applied across all documentation, calculations, and in any materials shared outside of the SEA. 	
Consideration 2.3: State and local report cards are error free and function as intended.⁶	
Assess Confidence in Operations and Results	
Reflection Prompts	Notes
<p>Key questions for the indicator: What processes and procedures are in place to “pressure test” state and local report cards to ensure they function, are located correctly (e.g., URLs and hosting sites), and can be accessed without barriers?</p>	
<p>Why is it important? In addition to the data that are included in state and local report cards, the full state and local report cards (i.e., the template and framing language) must be error free, functional, and accessible to stakeholders as intended. Any access issues can erode the credibility of accountability data, reports, and the system overall.</p>	

⁶ For more information, please see [Where the Rubber Meets the Road: Operations and Quality Control in School Accountability Systems](#) from the Council of Chief State School Officers. 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.

Reflection Prompts	Notes
Key evidence checks: <ul style="list-style-type: none"> • Ensure that quality-control requirements for reports are defined, tracked, and checked throughout report development, data import, and state and local report card publishing. • Ensure that business rules are developed, followed, and updated when state and local report cards are developed, revised, and published. • Determine who is responsible for testing, reviewing, and approving state and local report cards, and ensure that report milestones and progress are “signed off” as needed. 	
Potential next steps: <ul style="list-style-type: none"> • In addition to tracking state and local report card requirements and approval (i.e., sign offs), testing state and local report cards using external internet protocol (IP) addresses can help determine whether any data or reports are rendering incorrectly or inaccurately. • Check multiple formats of state and local report cards (e.g., access from computers, smartphones, tablets, and across operating systems), track any issues that emerge with the appropriate documentation, and revise code as needed. 	
Consideration 2.4: State and local report cards disaggregate data in meaningful ways and meet statutory requirements.	
Assess Confidence in Operations and Results	
Reflection Prompts	Notes
Key questions for the indicator: Are state and local report cards in line with statutory requirements? Are additional aggregations or breakdowns of data available that reflect AMD system objectives and state priorities?	
Why is it important? There are several new statutory requirements states must address with regard to state accountability systems and disaggregation. State systems should dictate how data are disaggregated, prioritized, and presented while adhering to statutory requirements.	

Reflection Prompts	Notes
Key evidence checks: <ul style="list-style-type: none"> • Verify that all statutorily required subgroups are reflected in reporting design and production. • Verify that any additional student groups specific to the state’s system of AMD are included in reporting design and production. • Verify that all other statutory requirements are met for reporting, while determining whether key data and information are highlighted based on prioritized system outcomes. 	
Potential next steps: <ul style="list-style-type: none"> • Although statutory requirements can be addressed by comparing state and local report cards to statute, consider reconvening stakeholders or bringing in other SEA staff that have not been directly involved in system and state and local report card design, development, and production. Obtain feedback from these groups to verify that prioritized system outcomes are reflected in state and local report card design, production, and data accessibility. 	

Claim 3: State and local report cards and resources facilitate meaningful exploration of accountability data and stimulate continuous improvement inquiry.

The utility and use of data from a state’s accountability system starts with accessing and reviewing this information on state and local report cards. It is important to consider how stakeholders, educators, and the community intend to use the data. This includes conceptualizing stakeholder capacity limitations, resources to expand stakeholder capacity, and strategies to encourage the use of accountability data.

For each consideration, review the key questions presented, and use the key evidence checks to help answer those questions.

Consideration 3.1: Systems and processes are in place to increase the capacity of key audiences to access and use accountability data and state and local report cards.

Assess Confidence in Operations and Results

Reflection Prompts	Notes
Key questions for the indicator: To what extent are stakeholder groups prepared to use and interpret accountability data?	

Reflection Prompts	Notes
<p>Why is it important? Strong design and easy access may not be enough to facilitate user access to state and local report cards and ensure effective data interpretation. It is important to support key stakeholder groups (e.g., parents, educators, educational leaders) in understanding how to interpret accountability data and extend interpretations toward connecting data that are relevant in their work.</p>	
<p>Key evidence checks:</p> <ul style="list-style-type: none"> • Determine what behaviors you would like to promote among educators and the public upon reviewing accountability data. Identify barriers that might impede user access or understanding. • Identify the resources that are developed that clearly describe information regarding accountability reflected on state and local report cards and how those data might be interpreted. • Based on stakeholder feedback, determine the degree to which users are able to access data and interpret data as intended. 	

Reflection Prompts	Notes
<p>Potential next steps:</p> <ul style="list-style-type: none"> Stakeholder feedback, particularly from educators and educational leaders, can be very informative and help SEAs to understand how state and local report cards are being accessed; where state and local report card data are being misunderstood; or whether accountability data are being linked to other state-, district-, or school-level data. If data are not being accessed, understood, or linked to other coherent data that are connected to high-stakes accountability data, consider working with stakeholders to identify high-priority areas that can promote effective access and understanding of data. Consider modeling the use of state and local report cards through sample scripts, resources, or videos of the following:⁷ <ul style="list-style-type: none"> How to facilitate effective parent-teacher conferences and parent/community meetings How to incorporate data from state and local report cards into school improvement plans How to design local budgets coherent with district and school strategic plans that target state and local report card information 	
Consideration 3.2: Systems and activities are in place to encourage greater use of state and local report cards and data.⁸	
Assess Confidence in Operations and Results	
Reflection Prompts	Notes
<p>Key questions for the indicator: What systems and activities have you put in place to help promote greater use of the state’s accountability system and accountability information included on state and local report cards?</p>	

⁷ For more information, please see [Communicating Performance: A Best Practice Resource for Encouraging Use of State and School Report Card](#) from the Council of Chief State School Officers. 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.

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Reflection Prompts	Notes
<p>Why is it important? Having representatives at each level of the educational system (e.g., state, region, district, school, and the public) who are strong advocates for the state’s accountability system and the information it provides can be a powerful tool. Consider what mechanisms might help elevate and highlight the importance of accountability information.</p>	
<p>Key evidence checks:</p> <ul style="list-style-type: none"> • Determine whether advocates from key stakeholder groups are engaged in sharing accountability data and communicating its value. • Confirm whether partnerships with local education leaders and community organizations are maintained or utilized as expected. • Gather information regarding how the public and other stakeholders (including educators) use, recall, or recognize state and local report cards. • Consider which resources supporting state and local report cards are most used or most successful, and why. 	

Reflection Prompts	Notes
<p>Potential next steps:</p> <ul style="list-style-type: none"> Increasing the perceived value of accountability data can be supported by working closely with local school leaders, parents, and community groups. Consider delivering targeted presentations or co-presenting with representatives from these groups to elevate them as advocates of the system. These individuals can also be empowered to promote the importance of accountability objectives and how accountability information can help track progress against those objectives. If key partnerships are missing or have deteriorated, engage with regional, district, or school-level leaders through regular webinars, meetings, or newsletters. These efforts may be trainings, discussions, or resources that focus on data analysis, literacy, and use. These efforts can, in turn, be used to facilitate strategies that target continuous improvement using school accountability data linked to coherent local data. If there is a need to increase the visibility of the state’s accountability system, consider branding the system or state and local report card, leveraging social media to promote accountability data release, or identifying alternative approaches to promote awareness of the system (e.g., text-alerts, e-mail blasts, recorded messages from district or school leaders). Monitor the efficacy of these strategies and how they are received by key stakeholder groups. 	