



Office of
**MAGNET,
CHOICE &
CHARTER
SCHOOLS**
A Division of Polk County Public Schools

Guidelines for Writing
Charter School Accountability Plans

A Division of Polk County Public Schools

**Ensuring rigorous, relevant learning experiences
that result in high achievement for our students.**

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Guidelines for Writing Charter School Accountability Plans

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Executive Summary

Polk County Schools support Florida’s charter initiative to establish charter schools to provide students and parents throughout the district with greater choice in their public schools. In exchange for the freedom to design its own programs, hire its own teachers, and set its own budget, a Polk County charter embraces a high level of accountability. This accountability is formalized in the charter school accountability system of the Polk County School Board. A lynchpin of this system is a school’s Accountability Plan, “establishing specific performance objectives to measure the school’s progress and success in raising student achievement, establishing a viable organization, and fulfilling the terms of its charter.”

A charter school creates an Accountability Plan to articulate to the community and the district what goals the school will use to measure its success. These *Guidelines for Writing Charter School Accountability Plans* are intended to give schools guidance on the type of data that provide compelling evidence, the desirable structure for goals and objectives, and how to most clearly present results. With these tools in mind, schools can write rigorous and measurable accountability plans that will serve them well as they participate in the charter school accountability process, especially at the time of renewal. Accountability Plans are written in a school’s first year of operation and serve as an important tool to guide the use of data and policy decisions regarding the school’s program.

There is a large amount of information in the pages that follow; it is critical that schools understand this information in order to create and track strong performance objectives. Writing plans can be a difficult and time-intensive task, as can be setting up the systems to track data in a reliable and consistent manner. When a good plan is written, however, it can be a powerful tool to express the school’s top priorities, to decide how it will measure success in those areas, and to guide a school’s allocation of resources.

Polk County charter schools know in advance the three main issues they will need to address to demonstrate that they are worthy of renewal: academic success, organizational viability and faithfulness to the terms of the charter. Thus, each plan should address each one of these key areas. Aside from this general guideline, each plan should reflect in format and substance the specific mission and program of the individual school. While there is no one “correct” way to write a plan, there are some overarching questions that a school should ask itself when creating its goals.

1. Is the plan rigorous and realistic?

For renewal of a public school charter, the Office of Magnet, Choice and Charter Schools does not prescribe one set of goals for all schools to meet. While schools are subject to all the requirements of the No Child Left Behind (NCLB), the charter school accountability system allows schools to set specific goals that are appropriate to the school’s unique programs and populations in addition to those prescribed by NCLB. At the same time, schools need to create goals that are realistic and rigorous enough to

warrant renewal at the end of their charter. In writing an Accountability Plan, it is important to remember that the fundamental goal of the Plan is to prepare an argument that provides comprehensive and compelling evidence of success in the three areas of renewal.

2. Is the plan measurable?

The Accountability Plan establishes specific performance objectives to measure the school's progress. These performance objectives will be evaluated each year by the school, the public, and the Office of Magnet, Choice and Charter Schools through the charter school accountability cycle and via the annual report. Because of this, the goals must be measurable both internally and externally, avoiding ambiguous phrases and unclear measures.

3. Is the plan measuring outcomes rather than inputs?

In establishing performance objectives, it is important to measure results, not inputs. Some of the most commonly measured and discussed forms of school data involve what a school is doing and implementing rather than the quality of the program and the effect it is having on student achievement and organization strength. Strategies, or inputs, that a school uses to achieve their ultimate goals can be articulated in the school's Annual Reports and other documents, but the focus of the Accountability Plan should be outcomes.

4. Is the plan focused and manageable?

An Accountability Plan is not designed to describe all of the outcomes a charter school has set for itself. It sets objectives for the most critical areas of its performance that will inform a decision about whether to renew the school's charter. Effective measurement and reporting can require a significant commitment of time and resources, and even concise goals can yield a lengthy Annual Report. A more powerful case is made when schools measure fewer things better than many things incompletely or superficially. In addition, schools should write plans in a way that is accessible to any reader, avoiding jargon or unnecessarily complicated language or measures. Any reader should read the Accountability Plan and understand what a school has set out to do. In turn, any reader should read the Annual Report and know whether the school is reaching its goals.

Once a school community has written an Accountability Plan that can answer each of these questions in the affirmative, the school is ready to submit its plan to the PCSB Office of Magnet, Choice and Charter Schools who will share this plan with the Office of Assessment, Accountability and Evaluation. A school submits its accountability plan after the first year of a school's charter and then subsequently with each renewal application. Schools report on their progress toward meeting their goals in an Annual Report each year as defined in the contract, as well as during quarterly site visits conducted by the Office of Magnet, Choice and Charter Schools. In the school's application for renewal during the final year of the charter contract, the school provides a final report on its performance in relation to the plan's goals that are then corroborated

during the school's Renewal Document. A charter school Accountability Plan allows a school to set goals that reflect its uniqueness and autonomy while giving substance to a school's commitment to parents and citizens to provide an outstanding education to each student. Charter schools accept the challenges that face all public schools and embrace a unique and demanding burden of proof in the accountability inherent in a charter. The Accountability Plan, focused on results and objective of achievement and performance, formalizes that challenge in a way that is useful for the school community, the charter authorizer, and the public.

Polk County charter schools were established to provide students and parents throughout the district with alternative choices to traditional public schools. In exchange for the freedom to design its own programs, hire its own teachers, and set its own budget, a Polk County charter school embraces a high level of accountability. Like all public schools, charter schools must comply with applicable laws and regulations in order to operate. To earn renewal of their charter, however, charter schools also must demonstrate their effectiveness; they are responsible for results rather than relying on plans, methods, or intentions. Charter schools that cannot demonstrate the achievement of their students and the effectiveness of their programs face non-renewal.

In addition, charter schools are highly accountable to the public because children attend the school at their parents' discretion. Parents are not required to enroll their child in a charter school, or keep them there, if the school is not effective. In short, charter schools must demonstrate their effectiveness to both public officials and individual parents in order to survive. As a result, the ability to provide effective, compelling evidence of academic and organizational performance is central to charter school success.

Providing evidence of success, therefore, is the purpose of a charter school Accountability Plan. Each charter school writes an Accountability Plan outlining the array of data the school will collect and present in proving its effectiveness and meeting its burden of accountability. When finalized, the Plan becomes part of the school's "charter" – the agreement between the charter authorizer and the school that allows for the school's existence. Thus, the Accountability Plan is a central element in the bargain of freedom to design unique programs in exchange for greater accountability to the public.

Why *Guidelines*?

Charter schools are given significant leeway to frame the argument for the success of their programs; thus, Accountability Plans are unique to each school. The *Guidelines for Writing Charter School Accountability Plans* give schools guidance on the type of data that provide compelling evidence, the desirable structure for goals and objectives, and the clearest presentation of results. The *Guidelines* discuss effective practices in educational measurement and the ways in which charter schools can apply those practices to present the strongest possible case regarding their success.

The Accountability Cycle and Accountability Plans

The charter school accountability process in Polk County is guided by three areas of inquiry: the success of the academic program; the viability of the organization; and the faithfulness to the terms of the charter. Because schools must present affirmative evidence of success in these three areas, these areas should provide the organizational structure for the Accountability Plan. In writing an Accountability Plan, each school should remember that the fundamental goal of the Plan is to prepare an argument that will provide comprehensive and compelling evidence of success in the three areas of renewal.

A well-written and rigorously tracked Accountability Plan provides the affirmative evidence for a successful school that supports a strong recommendation for renewal.

A prerequisite to understanding an effective Accountability Plan is understanding how this document fits into the larger system of charter school oversight. The Accountability Plan is a critical piece in submissions, visits, and evaluations that comprise the “Accountability Cycle” and ultimately serves as the basis for renewal decisions.

The first element of the Accountability Cycle is the granting of a charter. The charter application serves as a blueprint for each school and outlines the standards to which each school aspires. By June 30th, the end of its first year of operation, each school must turn general statements of goals included in the charter into a specific and measurable Accountability Plan. The Plan must spell out the goals to which the school commits itself and the measures that will be used to determine the degree of a school’s success in reaching those goals.

Every year thereafter, each school must submit to the Office of Magnet, Choice and Charter Schools an Annual Report. This report’s main purpose is to discuss the school’s interim progress on each goal in the Accountability Plan and present evidence to validate its claims. Therefore, the Accountability Plan and the Annual Report are pieces of the same process. The Plan should be written with the Annual Reports in mind, just as the Reports should be written with the Plan as a continual guide.

Evidence outlined in the Accountability Plan and presented in the Annual Reports is corroborated and augmented by a series of additional external evaluations of each charter school, including site visits in years two and three, and a renewal inspection following the submission of an application for renewal. These visits are intended to augment the results a school describes in reports, providing context to a school’s quantitative measures of progress by adding qualitative detail and anecdotal evidence in areas that are difficult to measure. The reports are intended to document the school’s progress, present additional data that will inform the renewal process, provide parents with descriptive information to use in selecting a school, and provide each school with objective feedback it can use to make its programs more effective. These purposes are more readily realized if a school has clarified its goals and performance standards in an effective and well-designed Accountability Plan.

Organization, Format, and Structure

> Begin With Your Mission Statement

Each school should begin its Accountability Plan with its mission statement, which reflects its distinctiveness, purpose, and reason for being. An effort to demonstrate a school's effectiveness in an Accountability Plan should flow out of this mission. Highlighting the mission statement helps the school focus on key elements and sets clear priorities. Reviewers will use the mission statement and the priorities it sets to inform their understanding of the school's progress in fulfilling its mission.

> *Include Additional Information Cautiously*

A good mission statement leaves out as least as much as it includes. Some schools may want to say more to explain who the members of the community are and what ties them together. These schools may wish to include a brief section in the Accountability Plan that provides additional information such as description of the people involved in the school or its philosophy. Alternatively, a school that specializes in working with at risk or non-traditional students might wish to include some discussion of students' background in this section. Such a section, however, is not necessary for a strong Accountability Plan.

> *Use Simplest, Clearest, and Easiest Format*

The *Guidelines* are intended to set standards for clarity, content, and effective measurement and leave most decisions about format to the discretion of schools. A school may write its Accountability Plan in any format or style, keeping in mind that one of the guiding principles is readability. The main goals of the school and how success toward these goals will be measured must be clear to the school community as well as to external reviewers. Required elements include the goals and a description of the objectives or measures by which the school will assess its achievement of the goals. No other sections are required. Again, simple, everyday language is ideal.

Goals should be written in precise declarative sentences. For example, an effective Accountability Plan for the hypothetical Downtown Academy Charter School might list five goals in the Academic Program section, each one corresponding to the school's core academic areas.

Academic Program

- I. Students at the Downtown Academy Charter School will become clear and effective writers of the English language.
- II. Students at the Downtown Academy Charter School will become proficient in and demonstrate continuous improvement of their reading skills.
- III. Students at the Downtown Academy Charter School will become proficient in and demonstrate continuous improvement of their math skills.
- IV. Students at the Downtown Academy Charter School will demonstrate mastery of critical knowledge and skills in the area of science.
- V. Students at the Downtown Academy Charter School will demonstrate mastery of critical knowledge and skills in the area of history.

The document makes a series of clear, precise statements about the school's goals for its students. The Downtown Academy's goals are clear enough that little if any explanation is necessary, making the document both measurable and transparent for all readers.

> For Every Goal, List One or More Objectives By Which it Will be Assessed

Once a school has framed its goals, it then must describe how it will measure its progress and define what level of performance indicates that the school is meeting or exceeding performance expectations. It is not enough for a school to say that it will give students a certain assessment or use a certain technique to evaluate itself. Schools must indicate how they expect their students to perform on each measure if they are indeed making strong progress. If the school met its performance goals, what would students know and be able to do? How would they act? What would parents say about the program?

Each goal must have at least one measure describing how it will be assessed. Some goals may have *just* one measure; others may have three, four, or more. Generally, schools should measure more extensively and accurately those goals that are most central to a school's work and those goals that relate to complex ideas or results in order to ensure accuracy, objectivity, and reliability. The use of multiple measures and objectives to evaluate critical areas of student achievement is discussed later in the *Guidelines* and its appendices.

> Set a Limited Number of Goals

An Accountability Plan is not designed to measure all of the work a charter school does. It is designed to measure the most critical areas of its performance, those areas that would inform a decision about whether to renew the school's charter. Effective measurement and reporting can require a significant commitment of time and resources. Generally, it makes for a more powerful case if a school measures fewer things better than if it measures many things incompletely or superficially. Articulating a limited number of clear, critical, and carefully measured goals allows a school to make a more convincing case for its excellence and can act as a powerful tool in decision-making on the school level.

> All Language Should Reflect the Goal of Measurability

The Accountability Plan is an agreement between the school, the Sponsor, and members of the public served by the school. Precise language makes this agreement clear, while ambiguous language may lead to different interpretations depending on the reader. For instance, a school would be entirely justified in aspiring for its students to make "strong yearly progress" in their math skills, but it also must define what "strong progress" means and how it is identified if it does occur. In some cases, schools can provide this clarification through the effective use of the objectives for each goal. In other cases, clearer language may be necessary.

Similarly, Accountability Plans should avoid trying to assess what cannot be measured. The feelings, beliefs, and perceptions of individuals or groups of people, for example, are hard to measure reliably. For instance, a goal of helping students believe they can learn represents an attempt to measure what students believe about themselves and their capabilities. Students might say they believe in themselves in a survey, but do they do so according to their definition of believe or their teachers? Learn what? To whose standards? In addition, the likelihood that anyone would answer “no” is low when asked, “Do you believe you can learn?” These same issues arise with the measurement of concepts such as “potential,” as in, “Students will achieve their full potential as writers.” Who, for example, determines a student’s potential and how?

> *Measure Results as Opposed to Inputs*

Schools should resist the temptation to measure inputs such as plans, methods, and intentions. Some of the most commonly measured and discussed forms of school data, such as class size and professional development plans, are in fact inputs. Decisions around class size is a strategy, a practice followed by a school which may lead to increased performance, and does not belong in an Accountability Plan. Similarly, a goal focused on the number of newsletters sent out to parents each year shows very little about the amount of parent involvement in the school, the quality of that involvement, or the ultimate goal of that involvement. The focus of the Accountability Plan is on outcomes.

Measuring outcomes rather than inputs is especially important in the area of academics where persistent or increased student achievement is the most compelling evidence of the success of an academic program. Strategies such as curriculum alignment or increase of after-school tutoring are vital to the program, but remain strategies to achieve a goal and not goals or objectives in themselves.

As is consistent with the charter school initiative, each school will use different means to reach their goals. While a school should clearly articulate these “strategies for attainment” on the school level and in the school’s Annual Report, these should be left out of the Accountability Plan. The three issues guiding charter school accountability are focused on outcomes, not strategies implemented.

> *Aim for clarity in content*

Schools should ensure that their Accountability Plan is clear and understandable by any reader. Charter schools, in seeking to provide parents with information about the education of their children and to demonstrate success of their program to the school board, *must* provide clear and useful information suitable to serve as the basis for sound decision-making. This imperative particularly applies to the Accountability Plan and to the Annual Report. Any reader should be able to read either of these documents and understand exactly what a school has set out to do and whether they have accomplished it.

> *Beware of Perverse Incentives*

In writing Accountability Plans, schools should avoid goals that could create an incentive to make decisions ultimately not in the best interests of the organization. For instance, a measure focused on teacher retention, if not phrased correctly, could encourage keeping a poorly performing teachers in order to maintain retention rates. Precise language can help avoid this situation. In this example, drawing a distinction between teachers who leave voluntarily and those who are asked to leave by the school might be one solution. Of course, if a situation arises where a decision made is best for the school but hurts the school's level of achievement of a goal, a school has the opportunity to discuss this matter in its Annual Report.

> *Prepare a Plan that Reflects the Timeline for Charter Renewal*

In writing Accountability Plans, schools need to remember they must have collected sufficient evidence of success by the time of renewal. In setting goals, it is important that these timelines inherent in the charter are taken into account.

Be aware of the length of your school's charter contract and factor that timeline into your plan. This timeline affects the type of goals or objectives chosen in the Accountability Plan. For instance, a college preparatory charter school with a five year contract might propose to measure itself according to how many of its graduates enrolled at what colleges and the performance of those students in college. If the school opened its doors with only sixth graders, however, it would not be able to present any evidence that it had achieved its goal by the time it faced its first renewal because its oldest students would be only in the 11th grade at that point.

A school opening with Kindergarten and growing one grade per year until it was K-6 would face a series of problems at renewal if it relied on only the 4th grade and 5th grade FCAT results to provide evidence of student achievement. In this case, the school's first class of 4th graders would take the FCAT in the spring of the fifth year of the charter, leaving the school with no data to present at the time of renewal. Even if the school's first students took the FCAT during its 4th year, FCAT scores would not be reported in time for the school's fourth year Annual Report or for the start of the renewal process.

In fact, if the FCAT were the only measure the school used and its first students took the test for the first time in the *third* year of the charter, the school would still face the challenge of trying to convince evaluators to draw conclusions from a single piece of data, one administration of the test. Moreover, it would limit its ability to convince parents, the general public, and potential funders that it was making strong progress during each year of its operation. In addition, a school would have no way to evaluate its progress in meeting goals they have deemed most important – a key element of self-evaluation.

In short, as interested parties increasingly look for reliable, consistent evidence of performance throughout a school's life cycle, charter schools come to realize that they are *always* accountable. A strong Accountability Plan ensures that a school will have reliable, objective data regarding its performance at every stage of its existence.

Academic Program Goals

A school's primary priority is the academic achievement of its students. Therefore, it is imperative that charter schools provide solid and convincing data regarding the success of their academic programs.

> *Use Multiple Measures and Objectives*

As public schools, charter schools in Polk County are required to administer FCAT tests. The importance of this test to charter schools in terms of measuring effectiveness is

underscored by NCLB. The Polk County Office of Magnet, Choice and Charter Schools uses the FCAT as the main gauge of whether a school is making adequate academic progress under NCLB.

Nonetheless, schools are encouraged to use multiple tools to demonstrate the effectiveness of all aspects of the school's program. For example, a school in which students achieved extremely high FCAT scores in the 4th grade might be accused of "creaming" the best students from its local district or districts. In order to contravene this argument, the school might use another measure to show that its students had improved significantly over time against their own earlier scores.. Further, the school might also wish to demonstrate that its students had achieved solid mastery in topics based on its unique school design.

The solution to the challenge posed by the use of only one assessment tool is to use assessments strategically and in combination. This strategy allows for the analysis of a variety of data that can show the depth of academic success. To adequately measure an important or complex goal, a school should plan to measure the goal in several different ways and with several different tools. Different kinds of measures serve different purposes and allow for different, often mutually reinforcing, arguments. See **Appendix I** for a discussion of various methods of assessing academic progress. In addition, schools should be aware of what are considered statistically reliable methods of reporting data. Refer to **Appendix II** for more discussion on this topic.

> Adequate Yearly Progress, NCLB, and Accountability Plans

NCLB requires that all students reach proficiency on state standards by 2013-2014. AYP represents the minimum level of improvement that schools must achieve each year in order to meet this goal. As public schools, charter schools are accountable for all the objectives set by the state accountability system. For renewal of a charter, FCAT results and AYP determinations are important pieces of evidence that is collected and analyzed to determine whether a charter school has met the criteria for renewal at the end of its five-year charter. FCAT goals in each accountability plan should be consistent with the overall goals of making AYP. While AYP determinations do not replace the accountability system that has been established for Polk County charter schools, charter schools should not overlook the importance of AYP determinations, both in their yearly practice as well as in their Accountability Plan. Objectives indicating successful overall school performance on the FCAT must be consistent with AYP goals.

Organizational Viability Goals

Certain criteria can help demonstrate a charter school's organizational viability. These include demand for the school's services, sound finances, as well as capable governance and management. In general, the school should strive to demonstrate that it is a sustainable organization and likely to continue operating in an effective and responsive manner.

> Measure the Market

One potential threat to an organization's viability is a lack of demand for the organization's services. If spaces remain unfilled, a school is likely to face financial difficulties in due time. Even before such a crisis occurs, the District might question why it should commit scarce resources to provide an option few parents seem inclined to choose. Therefore, schools should seek to demonstrate that parents choose and persist with the school.

Schools should set enrollment goals and consistently report aggregate demand figures, such as the average percentage of seats filled during the year, the percentage of students who return each year, and the ratio of application to available seats. Schools may also wish to provide further analysis of enrollment data, such as setting goals for and assessing the reasons families give for their decisions to leave. Do transportation problems drive families away? Do they leave because the academics are too difficult or too easy? Depending on the nature of the responses, such data can suggest complex trends and present mixed signals. Like many aspects of goal-setting and reporting, demand data may require further investigation and analysis by schools.

Additional data that can demonstrate demand include waiting lists and parent satisfaction. If such information is used to show organizational success in an Accountability Plan, it needs to be done in a reliable and consistent manner. In the case of waiting lists, the manner in which the lists are kept and recorded should be consistent throughout the years of the charter and data should be tracked and reported accordingly. Parent satisfaction is most clearly gauged through the number of students who come and stay at a charter school, and additional information can be measured through tools such as surveys. Please see **Appendix III** for more information regarding the use of surveys.

> *Track the Money*

Other potential threats to a school's organizational viability come in the form of financial issues such as a lack of adequate financial controls or poor financial decision making. Schools should commit to having sound financial practices and effective decision making procedures and to implementing a system capable of demonstrating that soundness. Each school must demonstrate financial transparency by submitting the required independent annual audit for each fiscal year. A school must also demonstrate its overall soundness by submitting actual and proposed budget for every fiscal year and an annual balance sheet demonstrating an adequate availability of funds to sustain operations in each Annual Report.

It is not enough for schools to say that these documents will be submitted. As with goals in the academic program area, schools must define the level of performance that indicates the effectiveness of the school's systems and program. Evidence of a balanced budget, ability to raise funds, and unqualified opinions on annual audits are good indicators of financial stability. For example, one of the Downtown Academy Charter School's goals might be to "demonstrate the sustainability and stability of the school through the careful use of financial resources." The measure of this goal might state that "actual and proposed budgets for each fiscal year will demonstrate effective financial decision-making suitable to sustain key programs and a record of academic effectiveness. Further,

a yearly independent audit with positive findings will give clear evidence of sound financial practices.”

In planning financial operation and reporting systems, schools should remember that financial mismanagement has been by far the most common cause of charter revocations and non-renewals across the country. Charter schools are public entities and therefore must ensure that their finances are entirely transparent and that their practices above any possibility of reproach.

> *A Viable School Must Demonstrate Sound Governance and Management*

The governing board of a charter school, as the holder of the charter, plays a more significant role than does the Board of almost any other organization. A charter school board is equivalent to the school board in a small district and as such represents the first line of accountability. When and if issues arise in a school, the Office of Magnet, Choice and Charter Schools will often rely on the Board of a school to devise solutions or conduct investigations. This is particularly important because charter schools are independent organizations. Even though the Office of Magnet, Choice and Charter Schools may identify concerns in school evaluations, it generally does not propose specific solutions, and the task of resolving problems falls to the governing board.

If evidence exists that a school’s governing board is not operating effectively, is not carrying out its duties, or appears less than fully capable of carrying out those duties effectively, then the school’s viability is in question. Each school must determine how best to provide evidence of its own sound and effective governance. Many schools have found an analysis and discussion of the minutes of their own Board meetings or of key Board decisions in a given year to be an effective tool. Some Boards have chosen to undergo outside evaluations of their practices to help determine their strengths and weaknesses and affect their practice.

Some other key organization issues that can be measured include the effectiveness of the school leader and teachers. A school might wish to measure the number of pre-determined goals that are met each year by the leader or how many of their teachers reach a certain level of success on their evaluation based on a consistent and clearly defined rubric. As mentioned earlier, it is important to avoid “perverse incentives” and keep in mind that the validity of objectives in this section are made stronger if they are corroborated or evaluated by a qualified external body.

> *Get to Results*

In the Organizational Viability section of the Accountability Plan, as in all others, schools should recall their commitment to be held accountable for results. As discussed earlier, this commitment often poses particular challenges in the final sections of the Plan, regarding Organizational Viability and Faithfulness to the Charter. Schools, however, can and must create the objectives that best prove their effectiveness in these areas.

There are times when a school may choose to include a *process goal or measurement* in the sections regarding Organizational Viability or Faithfulness to Charter. Such process goals, which focus on *how* something will be done, are often based on what has been proven to be strong organizational practice. For example, a goal regarding Board practice could include a measure that each year it will participate in a rigorous and systematized self-evaluation that includes input from the school community and whose results are made public. While the accomplishment of this measurement would not prove that the Board is a strong functioning body, it would provide important information regarding Board effectiveness. If such process goals or measurements are used, the school should be able to articulate why that specific measure was chosen by the school community.

Faithfulness to Charter Goals

The Accountability Plan, as the primary tool by which schools demonstrate their progress, should include several assessments of the school's faithfulness to the unique concepts and programs it has proposed in its charter application. In designing such assessments, schools should remember that Accountability Plans are designed only to measure the most important elements of a school's program and that they are designed and intended to measure results not plans.

Typically, a school would want to measure its effectiveness in implementing the most important aspects of its program. For example, a school with a bilingual program would want to measure its students' facility in their second language. A school with a strong emphasis on culture and community might wish to assess the school climate. A school

that intended to serve a particular population of students (at-risk students, for example) would want to track the progress of that group independent of the student body as a whole. A technology-focused school would want to measure its students' ability to apply computer skills.

In understanding how to best measure key elements of the charter, it may be helpful to use the technology-focused school as an example. The school's first inclination might be to set goals for and assess the ratio of computers to students or the number of hours a day when students use computers. While such aspects are important elements of the program, they indicate little about what students have learned about and are able to do with technology.

A better approach might be to develop a list of key technology skills that each student in the school should master by end of the first, fourth, and sixth grade. The faculty might construct a rubric describing how well students should be able to use those skills to have satisfactorily demonstrated mastery. The school might then plan an assessment to take place at the end of each of those years that evaluates students' ability to perform the skills in question. The school would then set goals for student performance on the assessment and have that rubric available for any outside reviewers to see.

Effective measurement like this requires creativity in focusing on outcomes rather than inputs. In many cases, schools may find that tools do not yet exist to measure results in the areas they wish to evaluate. In such cases, schools may have to develop measurement tools themselves. Because schools, charter and district alike, throughout Polk County often seek to measure the results of similar areas of their programs, developing innovative tools to measure performance accurately and effectively is an ideal area in which schools can develop partnerships and/or disseminate their best practices.

Drafting, Approval, and Reporting

> Deadlines and Process

The timeline for the production of Accountability Plans is designed to encourage schools to begin gathering data early in the process of implementing their school design. At the same time, it allows schools to develop their goals and objectives with the input of those involved in implementing the programs covered by the Plan. The final version, approved by the school's Governing board, is due on June 30 before the beginning of the second year of operation. For schools entering the second term of their charters after the 2004-2005 school year, Accountability Plans will be due at the time of the renewal application.

A final Accountability Plan involves on-going discussion within the school community as well as between the school and the Office of Magnet, Choice and Charter Schools. Frequently, finalizing a Plan requires multiple drafts. Because the Accountability Plan

sets the standards by which the school will seek to demonstrate its effectiveness, the Accountability Department, in conjunction with the Office of Magnet, Choice and Charter Schools, may require or recommend additional clarity on various terms and objectives contained in a school's Plan. Schools should understand that the Charter Review Committee, in approving Plans, reserves the right to do so with qualification. If a school includes language or objectives that the Charter Review Committee feels are inadequate in some way, whether they are unclear or not suitably objective or rigorous, it is possible that even successful or apparently successful achievement of the goals in the Plan as written might not result in the Charter Review Committee determining the school is a success.

> Reporting for Charter Schools Means Analyzing Data More Than Filling in Blanks

One of the most challenging aspects of charter school accountability is the change in the type of reporting that school leaders must do. Rather than merely plugging in data in provided forms, the accountability process for charter schools asks that each school analyze the information and construct an argument that is worthy of renewal based upon that information.

The reality of data is that it has little meaning until it is analyzed, interpreted, and explained. Public officials, parents, the media and others continually use school data to draw conclusions, with varying degrees of accuracy and sometimes with little input from or understanding of the school. In Polk County, the accountability system under which charter schools operate provides schools with an opportunity to present not only data but also an interpretation and analysis of that data. Because others will inevitably draw conclusions from a charter school's data, the opportunity to present its deeper analysis is a powerful tool for a school. For instance, Polk County School Board has FCAT scores for every school but it asks charter schools to report these data as part of the Annual Report, allowing the school to disaggregate and to interpret its scores to give a broader picture regarding student achievement. School personnel should keep the importance of analysis in mind as they write their Accountability Plan and their Annual Reports.

> More than Compliance

The primary purpose of a school's Accountability Plan and the Annual Reports is to prepare and present a strong case for a school's academic success, organizational viability, and faithfulness to the terms of the charter for an external audience. A well-written and tracked accountability plan is also an invaluable tool for a school's internal use. The creation of the Plan can aid in defining for all stakeholders clear and focused goals, which then drive decision-making and practice – a hallmark of good organizations. The resulting data analysis and reporting on Accountability Plan goals may affect decisions regarding finances, curriculum, and other programmatic aspects.

Schools that use their Accountability Plans as guiding documents are able to answer external reviewers' questions about major school priorities and the extent to which they are being met. Schools that have strong Accountability Plans are also more likely to have

implemented systems to track data efficiently and consistently and, therefore, are better prepared to write their Annual Reports and renewal application.

> *Making Changes*

Though a school should write its Accountability Plan with an eye towards permanence or at least longevity, it is sometimes necessary to revise the document during the term of the charter. In such cases, schools should amend their Accountability Plans well in advance of renewal with sufficient time to collect data to provide evidence for new objectives. All changes must be approved by the Polk County School Board in order to take effect and a school is therefore governed by the most recent approved Accountability Plan on file with the Office of Magnet, Choice and Charter Schools.

Conclusion

Charter schools are, by definition, exceptional institutions. Charter schools accept the challenges that face all public schools and embrace a unique and demanding burden of proof in the accountability inherent in charter. Charter schools are built on philosophy that success is possible for all children. In writing an Accountability Plan and in reporting its progress against it, a school embraces a commitment to both success and transparency. The Accountability Plan allows a school to set goals that reflect its uniqueness and autonomy while giving substance to a school's commitment to parents and citizens.

Appendix I:

Methods and Tools for Measuring Student Achievement

A school can use different assessment tools and different data-sorting methods to present overall student achievement. These *Guidelines* will discuss three main types of assessment tools to measure student achievement: criterion-referenced, norm-referenced, and internally developed assessments. Data from such sources can be used and reported in a variety of ways to gauge and report student achievement: absolute, value-added, and comparative measures of achievement. These tools and methods work together to demonstrate measurable progress of student academic success.

Assessment Tools

> *Criterion-Referenced Tests*

Criterion-referenced tests are based on a fixed standard of achievement. They rate students' performance not in relation to the achievement of other students but in relation to what experts and authorities believe an educated student should know and be able to do. The levels of achievement are determined prior to the administration of the test and remain the same no matter how students do. The FCAT is such an assessment. Hypothetically, every student in Polk County could pass or fail the exam and the required passing score would remain the same. Additional examples of criterion-referenced assessments are those included in programs such as the International Baccalaureate or Core Knowledge.

> *Norm-Referenced Tests*

Norm-referenced tests are some of the more commonly used tests, such as the Stanford-9 or 10, the Iowa Test of Basic Skills, and the Terra Nova. These tests are usually multiple-choice and measure the student's achievement against a standard established by a norm group. Individual student performance is compared to their peers nationally. These tests are particularly helpful in providing measures of growth over time. It should be noted that most normed, standardized tests measure a limited array of basic skills and are most effective in assessing progress in skill-intensive disciplines like math and reading. Because these tests are often significantly out of alignment with state learning standards in social and science, some schools find them less effective in measuring progress in these disciplines.

> *Internal Assessment Systems*

Many schools wish to include objectives in their Accountability Plans that are based upon a system they have designed themselves. Such internal assessments can often provide rich and compelling data that is beyond the scope of externally designed measurement tools. These can take many forms, such as portfolios, juried assessments, project grades, and essays. It is important, however, that such an assessment system is designed and implemented in a way that is reliable and valid. A school should keep in mind the following rules in creating such a system:

- *Internal assessments should be scored according to specific standards using consistent protocols or rubrics.* To collect meaningful data through an internal assessment, a school must ensure that such assessments are scored consistently throughout the school by each individual involved. Predetermined rubrics are key to such a system, as are clear protocols for implementation and scoring of such assessments.
- *Internal assessment systems should be vetted and validated.* If a school is using a common rubric and scoring protocol, it must ensure that these tools are being used by the entire faculty or group of graders in the same manner. How this is done varies from school to school. Some schools may use a process of gathering

teachers or an internally created panel to look at student work and corresponding grades to ensure consistency. Some schools have their system vetted by experts outside the school community or have external reviewers grade the assessments from which important data will come. Some schools may choose to do this for their whole grading system and others may focus this type of attention only on key assessments used in their Accountability Plan to show student performance. Whichever method is chosen, it is important that schools make sure that this oversight is an integral part of their system.

- *Internal assessments should assess areas of knowledge beyond the scope of other measurement tools.* Internal assessments in Accountability Plans serve little purpose if they fail to get beyond basic skills more easily assessed by standardized measures. Such internal assessments are most compelling when they show that students have mastered complex, “higher-order” skills.

As an example of an internal assessment used in an Accountability Plan, a school might augment standardized measures of its students’ writing abilities with an assessment that asks students to write a five-paragraph essay analyzing a novel. Such an assessment would provide compelling data if the results were scored by an internal committee or qualified, independent experts, such as a panel of local English teachers and community college professors. The school would also want to document that its panelists had looked for the mastery of specific skills and knowledge and were not grading students on the physical appearance of their essays or on undefined criteria. To address this challenge, a school would need to ensure that panelists adhered to a consistent rubric developed by the school and available to outside reviewers.

Effectively designing and evaluating a school’s own internal assessment system requires a significant amount of work. While schools may choose to rely on externally validated standardized tests, some schools’ internal assessment system are integral to their educational approach and therefore key to their measure of student progress. If used for external reporting, schools must be prepared to report results in a way that demonstrates consistent learning and achievement among entire cohorts of students, not merely among selected individuals. A school-developed assessment system that can only demonstrate the progress of individual students should not be included in an Accountability Plan because conclusions cannot be drawn about the school’s effect on the majority of its children.

Methods of Reporting

> Absolute Measure of Student Achievement

To measure success in reaching an Accountability Plan goal, some schools may choose to use absolute measures of student achievement. Such goals set an ultimate goal of where a school wants its students to be on a certain assessment – such as 80% of students scoring proficient or above on the FCAT tests, or all students scoring above the 50th percentile on a norm-referenced test. These particular objectives are not focused on growth but rather on the ultimate level of achievement expected by the school. An

absolute measure of achievement via a criterion-referenced assessment provides a clear reference to the ultimate goal, sets high standards, and, because the FCAT is required of all schools in the District, should be routine for charter schools. In fact, the NCLB goal of 100% of students reaching proficiency by 2014 is an example of an absolute measure for which each school must be accountable.

> *The Value added Measure of Student Achievement*

Value-added measures chart student progress over time on a particular assessment, comparing students' scores to their own previous scores. Looking at data in this way can provide indication of how much students have progressed academically within a given time frame. When doing this type of analysis, schools should pay particular attention to tracking intact cohorts of students. The *Guidelines* discuss this further in **Appendix II**.

Because a value-added measure compares students to themselves, it is the most effective tool for eliminating demographic issues such as the socio-economic status of students. When student scores are aggregated, a value-added measure allows administrators, regulators, and parents to see how much a school has added to its students' performance. The argument presented by such measures can contradict accusations that a charter school is "creaming" students, as well as ensure that charter schools are meeting their obligations to students of all academic levels. In the case of students who arrive performing poorly and perhaps several years behind their peers, a value-added measure allows a school to demonstrate evidence of learning standards. Without a value-added measure, the progress of an eighth grade student whose math skills improved from the 4th to the 7th grade level might be missed. At the other extreme, a school that inherited a population of students who were already performing consistently above grade level might not be able to demonstrate clearly the school's contribution to the student's performance without value added data.

Most schools currently generate effective value-added data from standardized, nationally-normed assessments. These tests can be given to students each year and are specifically designed to allow for year to year comparison. Value-added measurement can also be achieved using an internal assessment system provided that it is designed to collect such data reliably. It is, however more difficult to collect this data using an internal assessment system than when using a norm-referenced tests externally scored. Ultimately, when the FCAT has been implemented in all intended grade levels, it may allow schools to generate some comparative data across years, although not in the same way as norm-referenced tests. Because this is the case, schools should be prepared to gather value-added data through other assessments.

> *The Comparative Measure of Student Achievement*

Choice is central to the charter school movement and comparative measures provide information that enables effective choice, particularly for parents who may be deciding on an appropriate school for their children. Comparative measures also allow the charter authorizer to compare a charter school's progress against the progress of similar populations of students and schools.

There are several methods by which a school can establish a comparative measure of its effectiveness and its students' progress. If a school draws its students almost exclusively from a single school district, for example, it might choose to compare its performance to the district's performance on assessments that both entities use, such as the FCAT. Alternatively, a school might choose to compare its progress to the average of several specific schools from which it drew its students, with the average weighted to reflect the relative proportion of students that came from each school. A school might choose this technique in particular if the schools from which it drew its students were not reflective of the overall district performance level. A charter school might also compare itself to schools with similar demographics. Schools that draw their students from several districts also could compare their progress to each of the districts from which they drew a significant number of students or can compare their progress to a weighted average of those districts.

> *Example: How Multiple Objectives Might Be Used to Evaluate Reading Skills*

Goal: Downtown Academy students will become proficient readers of the English language.

Measures and Objectives:

- 1) Eighty percent of students who have attended Downtown Academy for two or more years will score level 3 or above on the FCAT Language Arts assessment.
- 2) The average national percentile ranking of each cohort of Downtown Academy students will increase by an average of three percentiles per year on the reading battery of the Stanford 9 until the average national ranking of the cohort is 70%.
- 3) Aggregate scores for students at Downtown Academy will place the school among the top 25% of middle schools in the City School District on the FCAT Language Arts Assessment, as measured by the proficiency index.
- 4) Ninth grade students at Downtown Academy will present an essay in which they compare and contrast character, a plot, and theme in two classic novels. The essays will be presented to a panel of local professors and teachers. At least 70% of students will receive a rating of proficient or better from the panel on the attached rubric.

In the example, the Downtown Academy Charter School used various measures to assess one of its most critical goals: to ensure that its students' are proficient readers of English. The school used an absolute measure, the percentage of students who pass the FCAT; a value-added measure, the average improvement of students on the Stanford 9; a comparative measure, its FCAT scores versus the rest of the District, and an in-depth measure that is externally evaluated and scores students according to specific, appropriate criteria. Through the use of the multiple measures, the school is likely to present compelling and thorough evidence of its students' proficiency in reading.

Appendix II: **Statistically Sound Measurement**

When using norm-referenced tests, such as the Stanford-9 or the Iowa Test of Basic Skills, it is important to understand the formats testing companies use to report the students scores. Each format has different meanings and different uses.

> Raw and Scaled Scores

Data reports from norm-referenced tests describe the performance of students or a student as a “raw score” and “scaled score”. The raw score indicates the number, or average number, of questions answered correctly. The scaled score corrects the raw score by compensating for the relative difficulty of the specific version of the test. The scaled score is used to determine three other numbers discussed below that school leaders should understand.

> Percentile Rank and Normal Curve Equivalents

When translated onto a normal curve, norm-referenced tests yield a score called the percentile rank. This score places each student on a curve of all test takers. The score indicates the percentage of test takers that an individual or group has out-scored. That is, a student who scores at the 55th percentile has out-performed 55 percent of the students in the nation at his or her grade level.

Percentile rank scores are commonly used by educators, with good reason but not always correctly. Percentile ranks are intuitive, easily understood by parents, and provide a precise measure. For instance, a measure of a student's percentile rank over several years that went from the 43rd to the 55th percentile in the course of three years indicates that the student's knowledge and skill level increased not only in the absolute sense but also relative to a typical population of his peers. This student passed 12 percent of the students over three years. Percentile rank scores, when tracked over time, reveal a great deal of information.

Though they are both intuitive and responsive, percentile rank scores pose several problems. One significant problem is that scores of more than one student cannot be averaged together to compute a mean score for a classroom or a school without first being converted into another form. On a normal curve, an increase from one score to the next higher score on the curve does not necessarily indicate an equal increase in actual performance as would be indicated by a similar gain at another point on the curve. In other words, the "interval", or distance between a score and the next higher score, at the 50th percentile is different from the interval at the 90th percentile. Because so many more students are grouped near the middle of the curve, moving from the 50th to the 51st percentile requires only a tiny increase in the number of questions answered correctly. With fewer students at the 90th percentile, a student might have to answer several more questions correctly to show the same one percentile increase.

This problem can be addressed by using a tool called the normal curve equivalent (NCE). Tests makers report scores in NCE by performing additional calculations on the percentile rank scores to make them useful for averaging and comparing year to year. Like percentile rank scores, NCE scores are also reported on a 1 through 99 scale where a score of 50 also represents the mean score. An NCE score, however, doesn't represent the same thing as a percentile rank score does. A percentile rank score of 53 means that a student outscored 53 percent of her classmates nationwide. An NCE score of 53 is a derivation from another number. That's a hard concept to discuss with parents when assessing their students' or the school's performance. Still, NCE scores can be safely averaged, aggregated, and used to calculate in myriad ways. What this means for schools writing Accountability Plans is that they should plan to either measure and report scores in NCE or, if they prefer the intuitiveness and "meaning" of percentile rank, to calculate the various means they require in NCE and then convert them into percentile rank *as the very last step in the process.*

> *Grade Level Equivalents*

One other score format bears mentioning, as it is one of the most commonly used score formats, although the most misleading. Grade level equivalent scores report a score for each student indicating a grade level and a number of months reflected by their performance on a given test. A grade level equivalent of 5.2 indicates performance akin to that of a fifth grader during the second month of the school year. While this appears to be a clear and useful measure and one that is intuitive for both parents and teachers, statisticians indicate that they can be misleading if not inaccurate. For example, assume that a student who scores at grade level 5.2 was a fourth grader. A parent might be inclined to conclude that her daughter was scoring at the fifth grade level and should be assigned fifth grade level work. In fact, the measure indicates that performance level one would expect a typical fifth grader *on fourth grade level work*, a very indirect measure. For this reason, test specialists consider grade level equivalents with far more circumspection than they do most other data and are generally reluctant to use them.

In addition, grade level equivalent scores, like percentile rank scores, cannot be used accurately to calculate the averages or means of more than one students' scores. Thus while schools may find them useful for discussing the scores of a single student with individual parents, grade level equivalents are not an effective or appropriate tool for reporting performance data to public officials or to the general public in the Accountability Plan or Annual Report.

> *Tracking Cohorts*

When looking at assessment data over time, the most statistically accurate comparisons from year-to-year are made at by tracking cohorts of students. For purposes of the Accountability Plan, a cohort is an intact group of students that does not change over time. For example, a school serving fifth through eighth graders gives every student the Stanford-9 upon entrance to the school and administers the test each consecutive spring until students graduate from the eighth grade. Its class of 2003 took its initial test in the fall of 1999 and then each subsequent year until its final administration in spring of 2003. In attempting to look at the improvement in performance over time of its students, this school might be tempted to compare the aggregated NCE scores from the initial fall administration in 1999 to each subsequent test for the class of 2003. While this appears to be looking at performance longitudinally, it does not take into consideration students who left or entered the class of 2003 during the past four years. Therefore, the scores used are not comparable because they have not been controlled for varying enrollment. A more statistically accurate analysis would include only those students who have been at the school for every test administration, eliminating the scores of those students who were not part of the initial administration.

Tracking cohorts is not only more statistically accurate, it also allows a school to make argument that the longer a student stays at the school, the better they perform. Such an analysis should control for scores of students who enrolled only weeks prior to the test administration, which could skew the aggregate score of the grade.

Tracking intact cohorts can also be used when creating absolute measures for other assessments such as FCAT. While each school's FCAT scores will be reported as an

aggregate of all current students, and these scores are the basis of determining AYP, a school can provide additional information on how those students who have been at the school for a specified amount of time perform. This gives evaluators information regarding the effect the school has had on achievement for those students who have benefited from the program a longer period of time.

> *Small Sample Size*

Another problem can arise when schools compute averages or means, particularly on nationally normed tests, using the test scores of a very small group of students. Generally, the greater the number of students included in calculating a mean, the less likely that a few anomalous scores will skew the results. However, schools in general, and charter schools even more so, are small institutions that generate small pools of data. Statisticians indicate that averages including fewer than 20 test takers are less accurate. Schools should be aware of the inherent challenges of testing on a small scale, even while they remember that the burden of proof is theirs. It is incumbent upon each school to find the best available solution to its particular circumstances. Schools should approach this challenge by working in consultation with the Office of Magnet, Choice and Charter Schools and with the understanding that irrespective of the circumstances, test results in general, and the FCAT in particular, are both viable and necessary tools for the evaluation of all charter schools.

Appendix III: **Use of Surveys**

A well-developed survey takes time, but once designed and vetted it can be a highly effective measure of the school's relationship with stakeholders. In using surveys, schools should be aware of several specific challenges.

Surveys are most effective when carefully and specifically worded to measure a school's effect on its students, with a clear focus on results. Consider the difference between a survey goal stating "eighty percent of parents will agree that their students understand and appreciate art" and a goal stating that "eighty percent of parents will agree with the statement, "The school has increased my child's understanding and appreciation of the visual arts." Parents could easily assume the first question asks for an assessment of their children's affinity for the arts. Clearly, most parents love their children and are inclined to believe that they appreciate things, and parents are more inclined to feel more favorably about their own children than they are about even the finest school. Therefore, such a question is likely to skew results to the positive. More importantly, even if parents are correct in their beliefs about their children's appreciation for the arts, *the point is whether students appreciate the arts but whether the school has increased their capacity to do so*, something the second question asks about specifically and directly.

Surveys are also most effective when questions are highly specific. The second goal in the example above is stronger because it includes a direct quotation of the question asked of parents. In another example, a Plan might suggest a measure that "eighty percent of parents will report, in an annual survey, that they are satisfied or highly satisfied with the school." Compare this to a measure stating that "eighty percent of parents will report that they agree or strongly agree that 'teachers in the school are effective and set high standards for students'". The first measure gives no indication of the criteria used to determine satisfaction. Perhaps parents are satisfied because lunches are tasty or because the school is right on their route to work in the morning, criteria that are nearly irrelevant in terms of determining renewal. The second measure specifies the criteria for parent satisfaction and directly addresses a specific outcome of critical importance.

A few other aspects of the use of surveys affect the reliability of the information gathered. The first is the rate of return. Schools may very well find that a survey of particular stakeholders only yielded a relatively small percentage of the returned surveys. If only fifteen percent of the parents return a survey, those results cannot be considered to reflect the general opinions of the parents – only of that fifteen percent. In addition, the way in which surveys are administered, collected, and tabulated has a large effect on how reliable the information is. To truly gather opinions from stakeholders, anonymity must be assured and the data must be collected and aggregated correctly. Many schools address this aspect by hiring an outside survey firm to send and collect survey data. There are other ways in which this can happen – through the internet, with certain computer programs, or with a well-developed paper system – but schools must be cognizant of these challenges when using surveys.