STATE OVERSIGHT AND THE IMPROVEMENT OF LOW-PERFORMING SCHOOLS IN CALIFORNIA

EXPERT WITNESS REPORT

by

Heinrich Mintrop, UCLA

for

ELIEZER WILLIAMS ET AL. vs. STATE OF CALIFORNIA

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I. INTRODUCTION

Background and Qualifications

I have worked in education as both a practitioner and a researcher since 1978. During this time I have gained practical experience in schools in the United States and Germany, as a teacher and in various leadership positions. Since attaining my Ph.D. in education from Stanford University, I have conducted research for many years on educational reform and improvement. My research has looked at the dynamics of educational change on the macro-system, meso-organizational, and micro-classroom levels. I believe that such a multi-layered approach is necessary to capture the complexity of school improvement.

Thus, my research on educational reform and school improvement has addressed the following topics:

* Large scale systemic reform;
* Effectiveness of school reform models and the dynamic of educational change;
* Institutional conditions shaping civic education in the school systems of 28 countries;
* K-16 alignment and state policies to forge a better articulation of secondary and post-secondary education;
* Conditions for constructivist teaching in teacher education programs and schools;
* High-stakes accountability and the improvement of underperforming schools.

Publications

I have published on all of these topics. Among others, I have written:
* A book on large-scale educational change in the German system;
* Several articles (*Educational Policy; Educational Administration Quarterly; Elementary School Journal*) and conference papers on high-stakes accountability, schools on probation, improvement planning, comprehensive school reform designs, and instructional reform;
* A book manuscript on high-stakes accountability currently under review.

Information and Material Used

For this expert report, I have primarily drawn from five sources:

* Articles, books, reports about dynamics of educational reform, low-performing schools, accountability systems, inspection, and the role of districts and states;
* Interviews and observations in several California districts and at the state level;
* Quantitative data from the state data bases (CBEDS; PAIF);
* Deposition material;
* Insights from my own studies of school accountability systems in the states of Maryland and Kentucky.

I received the material through the Internet, print publications, other researchers, the state department of education as well as through my own data collection or that of my research

assistants in direct contact with educators, policy makers, and administrative personnel on the school, district, and state levels. The deposition material was provided by the plaintiffs' attorneys. Lastly, I have drawn from my own databases.

I have not previously provided testimony in litigation, neither in deposition nor at trial.

II. Nature of Assignment and Summary of Opinion

I was asked to evaluate to what degree the current systems of public school accountability and state oversight in California enable the state to ensure an education to all California students on equal terms. Based on the evidence available to me, I conclude:

(1) The current system of state oversight over California schools lacks standards of adequacy for learning conditions that can potentially be evaluated statewide and that schools can use to evaluate themselves.
(2) While the state's accountability system as currently constructed defines standards of student and school performance with the help of the academic performance index (API), the state lacks mechanisms to identify performance barriers systematically across schools that do not meet adequate performance standards, as defined by API growth targets. Many performance barriers encountered by schools are systemic, that is, caused by district (and state) policies, yet the current school-based accountability system ignores this. As a result, the state has no way of knowing what statewide policies and local interventions are needed to move underperforming schools to adequate performance levels.
(3) Oversight over and support to schools and districts, in need or distress according to the state's own performance criteria, are insufficient. Large numbers of schools that qualify for the state's Immediate Intervention/Underperforming Schools Program (II/USP) are not reached through state oversight or support. Moreover, as of the writing of this report, there is little evidence that the state has developed effective intervention systems for a sizable number of schools and districts that have not improved sufficiently according to the state's own performance criteria.

In summary, the state presently lacks standards for adequate school operations, systematic mechanisms to detect performance barriers, and sufficient provision of support and intervention.

Premises

I base my findings on the following premises:

New Governance and Oversight Structures

In previous decades, the role of federal and state governments in education was limited. On the whole, schools were financed, governed, and supervised locally (Conley, in press). Testing of student learning was widespread and standardized, but rarely used to make decisions about student advancement and to measure the performance of schools and educators. Schools were largely autonomous, teachers' work was only minimally inspected, and quality of education was gauged by the provision of inputs to the educational process (Meyer & Rowan, 1978). Federal

compensatory programs from the 1960s onward provided resources for additional services for disadvantaged students. Monitoring of these programs was largely limited to compliance reviews of appropriate spending and appropriately targeted services.

This system of local control and loose oversight has dramatically changed due to two developments. (1) In many states, financing of education shifted from local districts to the state as states were compelled to equalize funding across districts, and (2) conceptions of quality shifted from the provision of inputs to the assessment of outcomes (Smith & O'Day, 1991; Conley, in press; Timar & Kirp, 1998; Lusi, 1997; Goertz, 2001). Dissatisfied with low performance levels overall and the slow pace of educational improvement at increasing costs, particularly in schools serving traditionally disadvantaged populations, educational researchers proposed to set up accountability systems that were "crystal clear" in their performance standards, that attached incentives and sanctions to desired outcomes, and that left it largely up to educators to craft strategies that would reach these goals (Hanushek, 1994). In such a system, it was hoped, schools could be released from undue and counterproductive regulations, and the dynamic of change through external policies could shift from a reliance on compliance to one on incentives. Thus, in a system designed to stimulate continuous improvement rather than reproduction of the status quo, oversight as well ought to lose its static character. Emphasis on routine evaluations of compliance gives way to situation-specific evaluations of all inputs in light of expected or accomplished performance levels.

Though differing by state, the results of these dynamics were outcome-based or standards-based accountability systems run by states, in some cases on the basis of more equalized funding, that broadly consist of the following elements (Fuhrman, 1999):

* Focus on student achievement, most often measured by simple numerical indicators;
* Public reporting of performance indices;
* Schools as units of improvement;
* Expectations of continuous performance improvement;
* Identification and categorization of over- and underperforming schools;
* Rewards and sanctions for educators, and promotion and graduation for students, attached to performance.

Currently, many states in the U.S. and governments in other industrialized countries experiment with outcome-based accountability designs. Their most common design elements are: standards, mechanisms to detect excellence and shortcomings in the system, and ways to reward the former and remedy the latter. But systems differ in degrees of development and elaboration (Fuhrman & Elmore, 2001; American Federation of Teachers, 2001; Goertz & Duffy, 2001; Quality Counts 2001, 2001; Quality Counts 2002, 2002), and they change when political coalitions shift (Cibulka & Lindle, 2001). While in the United States the primary thrust of the new accountability systems is outcome-based, i.e., leveraged through performance indicators, in Europe the primary thrust is review and inspection (Brooks & Hirsch, 1995). England has developed a system that combines a strong thrust via performance indicators with an elaborate system of school review and oversight (Wilcox & Gray, 1996) that is designed to detect shortcomings in the provision of education systematically and continuously and to trigger interventions in a timely manner. School reviews in England are comprehensive (Ofsted, 2001a;

Ofsted, 2001b) and go far beyond the school audits and document-based compliance reviews traditionally used in the administration of American categorical programs.

The California school accountability system was developed in the wake of these national and international trends. The Public Schools Accountability Act of 1999 (PSAA) created performance assessments and an Academic Performance Index (API) for each school site. Rewards and sanctions are attached to reaching API growth targets. With PSAA, the state has come to control more tightly the outcome of education while the specific ways to achieve these outcomes remain largely under local control. With PSAA, the state raised expectations of continuous performance improvement and equalization across the system. In fact, the challenge of equalization requires the state to design systems of accountability and oversight that manage to accelerate the rate of improvement in the state's lowest-testing schools relative to higher-testing schools. The current accountability system design itself with its varied API growth targets reflects this goal of state policy making, but it seems unlikely that the system as currently designed will achieve its goals.

The new accountability systems rearrange roles and responsibilities for districts and schools (Goertz, 2001). In California, as in other state accountability systems, the state has become more involved in education and holds schools directly accountable for performance, and schools' persistent underperformance may trigger review, interventions, and sanctions. The role of districts, however, is ambiguous. Some accountability system designs largely circumvent the district (e.g., Kentucky). In California, districts are not directly targeted by the original PSAA legislation. But the subsequent High Priority Schools Grant Program makes interventions in district governance and administration a possibility.

What Matters in School Improvement?

In education, the relationship between student learning and the factors causing it is often difficult to construct. That is, educational inputs, such as teacher qualifications, school capacity, facilities, class size, instructional materials, but also organizational processes, instructional programs and individual work effort, are connected to educational outcomes, but not in a straightforward way. Rather they all interact with each other in ways that vary considerably according to local contexts. This uncertainty has resulted in debates among researchers about the effect of specific inputs on measured student achievement (see Hanushek, 1994; Greenwald, Hedges, & Laine, 1996; Murnane & Levy, 1996). But the introduction of state-wide accountability systems has made it increasingly feasible to connect measured student achievement outcomes with requisite inputs, allowing for the formulation of adequacy standards for educational inputs (Odden, 2001; Quality Education Commission, 2000). At present, models have focused on adequate monetary resources and have to a lesser degree developed broad quality indicators, such as adequate teacher qualifications, faculty stability, facilities, etc., as preconditions for envisioned outcomes. Moreover, research has shown the crucial importance of opportunity to learn for student outcomes. Students are said to have the opportunity to learn content that is covered by teachers and delivered in effective ways. For example, Schmidt (2001), in surveying mathematics instruction in countries participating in the IEA Third Mathematics and Science Study, found that regardless of overall performance students from various countries tended to perform well in areas that were emphasized in their national curriculum. Thus, O'Day and Smith, in applying

their conception of systemic reform (1991) to the challenge of closing gaps between advantaged and disadvantaged student groups, postulate the necessity for applying performance standards in conjunction with input and instructional practice standards (O'Day & Smith, 1993). Especially practice standards are best evaluated through direct review or inspection of schools, akin to forms of instructional supervision (Glatthorn, 1990).

Educators work in "weak" situations in which connections among work effort, effect, and reward are tenuous (Shamir, 1991). Thus, among practitioners, perceptions vary widely about who contributes what to educational outcomes, and educators in low-performing schools are apt to diminish their own control over student outcomes (Mintrop & Associates, 2001; Mintrop, 2002). Research on effective schools, on the other hand, has shown that it matters what principals and teachers do in schools independently of student social background. This research has identified characteristics of effective organizational and instructional practices (Reynolds et al., 1994; Gray et al., 1999; Teddlie & Stringfield, 1993). Comparisons between effective and less effective schools operating under similar conditions suggest that a heretofore untapped performance potential might exist in less effective schools that current state accountability systems aim to unleash. School improvement research focuses on understanding how schools become more effective (Reynolds, Hopkins, & Stoll, 1993) and how a blend of internal school conditions and external pressures might move schools along (McLaughlin & Talbert, 1993; McLaughlin, 1991; Louis & Miles, 1992).

Researchers have made progress integrating knowledge about adequate inputs and learning conditions, characteristics of effective schools, and dynamics of school improvement. But professional judgment is still indispensable when devising an effective strategy of school improvement. Such judgment gauges how, contingent upon the specific school context, system inputs (e.g., facilities, teacher qualifications, instructional materials) and site efforts (school management, instructional programs, work effort) contribute to student achievement. Gray and Wilcox, veterans of research on effective schools, formulate their professional judgment this way:

> Adequate levels of resourcing seems to be a necessary but not sufficient condition for a school to be effective; quite wide mixes of resources seem to be associated … with success. Several caveats are, however, necessary.
>
> 1. In 20 years of reading research on the characteristics of effective schools we have only once come across a case of an 'excellent' school where the physical environment left something to be desired; interestingly, in that particular case, working on the environment of the school had been one of the new principal's first priorities, as indeed it appears to be with most new headteachers.
> 2. In many years of reading HMI's published reports on secondary schools we can only remember two or three occasions where their overall rating was highly favourable and the roof (or something similar) was in need of repair; and someone was always in the process of doing something about it.
> 3. We have never read an account of a 'good' school which had serious staffing difficulties.

(Gray & Wilcox, 1995, p.21). In order to make this professional judgment a powerful tool for school improvement on a large scale, it must be organized and institutionalized in systems of review or inspection.

Performance Barriers, Performance Contributors, and Work Motivation

It is widely accepted among researchers on work motivation that goals and rewards motivate workers to the degree that they are perceived as attainable and controllable through work effort (Odden & Kelley, 1997). This is true for individuals as well as work groups, such as schools (Mohrman, Mohrman, & Odden, 1996). Teacher work motivation is a key component of accountability systems that control work effort indirectly through outcomes and incentives attached to these outcomes. While school accountability systems challenge educators to raise their expectations for students and the quality of their own work, it is de-motivating when actors are held accountable for things they do not control (Vroom, 1964; Lawler, 1973).

Thus an effective accountability and oversight system is in need of detection mechanisms for root causes of performance barriers and distinguishes carefully among actors or agencies primarily causing them. Systemic barriers across a district or the state that surpass the control of schools or districts, respectively, need to be recognized as such. When remedies for performance barriers are referred to the primarily responsible levels (school, district, state), actors control solutions and are more likely to be motivated to enact them. For example, in a study of low-performing schools conducted by the author of this report, a great impediment for a productive response of educators to their school's low test scores was the belief that the root causes were external to the school. Educators were unable to distinguish barriers over which they had control from those that were indeed systemic in nature (Mintrop and Associates, 2001; Mintrop & Nishio, 2001). In a system that singularly put the onus of accountability on schools, the state's demand for "No excuses" was seen as an affront, rather than a challenge.

A system that evaluates performance adequacy in conjunction with adequacy in conditions of teaching and learning accomplishes three things:

- It helps identify root causes for performance barriers and thus facilitate remedies pegged to the appropriate level of the system. For example, when a school continually loses teachers on a large scale due to salary differentials with neighboring districts, the solution must be found outside the school, notwithstanding the internal efforts of the school to make itself an attractive workplace.
- It facilitates educators' performance motivation, as they identify barriers under the control of schools and those that other levels of the system are called upon to take responsibility for.
- It ensures a minimum level of protection in cases where children's rights to a decent education may be violated. While the purposes under (1) and (2) require a high degree of professional sophistication from school evaluators, (3) is a simpler task. The oversight system detects whether school operations are proper (i.e., follow laws and regulations), efficient (i.e., make best use of available human and fiscal resources), and adequate (i.e., are sufficient to achieve performance results considering the school's educational challenges and the state's performance expectations). When it detects shortcomings, it identifies primary contributors of standards violations, assigning responsibility to appropriate levels and actors.

Reciprocal Accountability

Accountability in a democratic state flows from top to bottom, but also in reverse. Accountability systems are two-way lines of communication. Communication of performance expectations and oversight over adequate performance and learning conditions flow from top to bottom. From bottom to top, information flows to craft effective policies that address systemic shortcomings on the local or state level. Richard Elmore (1997) states that "the first diagnosis of school failure should not be directed at teachers and students, but at the way policy makers and administrators have organized resources to promote new knowledge and skills in schools." England provides the example for a more reciprocal system. In England, where schools are held accountable to a national curriculum and national assessments, a key function of the school inspectorate is to write reports that summarize policy-relevant findings from the many school and local inspections conducted by the Office for Standards in Education (OFSTED, 2000 at http://www.ofsted.gov.uk/). Reports have addressed educators' performance accomplishments and shortcomings, but also the lack of educational provisions that fall under the responsibility of local and national policy makers. For example, in the 2001 report to Parliament, Her Majesty's Chief Inspector of Schools comments:

> Attention to the teaching of literacy and numeracy is essential and many schools combine this with an appropriately broad curriculum. However, in some primary schools the arts, creative and practical subjects are receiving less attention than previously. This risks an unacceptable narrowing of the curriculum pupils receive.

(Ofsted, 2002, p.1).

Regarding closing the performance gap, the Chief Inspector observes:

> Although at primary level, the gap between the highest and lowest performing schools is narrowing, at secondary level, despite improvements within the lowest performing schools, the gap has widened. Many schools facing challenging circumstances are working very hard to improve their performance, but the multiplicity of challenges they face are not all within their power to tackle.

(Ofsted, 2002, p.2).

These reports are said to be highly influential in giving directions to informed policy-making (Case, Case, & Catling, 2000; Wilcox & Gray, 1996; T. McLaughlin, 2001; Wilson, 1996; Gray & Wilcox, 1995). Accountability also means that the top (the state) is held accountable by communities and citizens for the adequate and equitable provision of education. Data collected through school inspections and compiled in authoritative reports facilitate the information of concerned citizens who can utilize state complaint procedures with more facility.

Balance of Oversight and Support

A good accountability system balances oversight and support. In an accountability system that is designed for continuous improvement, oversight mechanisms not only gather information for policy makers and the public about the state of education, but also serve a useful function for school improvement. It is key for remedying shortcomings that the system mobilize those educators most willing and able to engage in school improvement and leave enough room for local variation in crafting improvement strategies. Mobilizing high-quality workers is key for the improvement of all organizations (Schein, 1997), but it is especially important for schools (Gray et al., 1999; Rosenholtz, 1991; Fullan, 1993). Schools are unique workplaces in which, on one hand, professionals wield large control over their work and, on the other hand, the opportunities of supervisors to reward good performance through differential extrinsic rewards (e.g., money, career steps) are slim (Odden & Kelley, 1997; Malen & Hart, 1987). Thus, teachers for the most part can be made compliant, but cannot be coerced or compelled into performing highly without being won over.

Mobilizing teachers to engage in improvement requires teacher performance assessments that are meaningful to the values of educators (Mintrop and Associates, 2001; Mintrop, 2002; Mintrop & Nishio, 2001), a supportive organizational climate of professional learning at schools, skillful external personnel that can provide challenge and support, and avoidance of bureaucratization. A conducive organizational context for improvement requires more than performance indicators, compliance reviews, and effective management. It rests on a culture of collegiality, trust, and innovation (Little, 1982; McLaughlin & Talbert, 1993) that cannot be regulated into existence. Rather, oversight systems need to leave schools some autonomy in crafting solutions to performance problems, but also to provide sophisticated external support and pressure (McLaughlin, 1991). The importance of skills and quality of external support personnel cannot be underestimated. Implementation studies of school reform projects, such as the New American Schools Designs (Stringfield, Ross & Smith, 1996), have shown that personnel is as important as structure for the implementation success of specific projects. According to Yonezawa & Datnow (1999), skills and commitments of external consultants attached to the projects were as crucial as the programmatic features of the touted designs. Lastly, for oversight to be useful, burdening the school with undue paperwork, reporting requirements, and bureaucratization needs to be avoided (Wise, 1977; Fullan, 1991).

Conditions of Improving Low-Performing Schools Within High-Stakes Accountability Systems

An equity-oriented performance-based accountability and oversight system that aims at closing persistent achievement gaps relies on a dynamic of continuous school improvement. In this dynamic, lower-performing schools must outpace higher-performing schools in making gains. Like the one in California, most accountability systems go beyond the "naming and shaming" of low-performing schools and offer support to increase the chances of low-performing schools to catch up (Goertz & Duffy, 2001; Quality Counts 2001, 2001; Quality Counts 2002, 2002; CPRE, 2001).

Studies have found a variety of obstacles for low-performing schools to meet this challenge:

- Many low-performing schools suffer from low organizational and instructional capacity caused by high teacher turnover, unqualified teachers, unfilled vacancies, lack of instructional materials, weak principals, or high principal turnover (Mintrop & Associates, 2001; Mintrop, 2002; CPRE, 2001; Hess, 2000; Hess, 1999a, 1999b; O'Day, 1999a; O'Day & Gross, 1999b; Reynolds, 1991, 1996; Goe, 2001). Thus, they need baseline stabilization first before they can embark on more ambitious instructional changes. This kind of baseline stabilization, largely beyond schools' control, needs to be provided by districts and states. For example, Mintrop found that constant teacher turnover, increasing number of inexperienced teachers, severe overcrowding, and reassignment of instructional specialists to regular classroom duties due to unfilled vacancies made improved achievement very difficult, even in schools that responded to low performance with a proactive stance. Studies have also found that although many state accountability systems are school-based (that is, they treat the school as the strategic unit of performance accountability and improvement), districts were instrumental in shaping schools' responses and ultimate success (Mintrop & Associates, 2001; Mintrop 2002; Hess, 1999b; Fuhrman, 1999).
- Serious job commitment problems in underperforming schools make it impossible for policy makers to increase the effectiveness of the programs by merely raising the stakes, that is, by putting more pressure on low-performing schools to perform. It is likely that this will exacerbate high turnover rates as teachers evade further pressures.
- Teachers do not find the accountability system meaningful for their situation. Mintrop & Nishio (2001) found in their study of Maryland and Kentucky schools on probation (II/USP schools as the California equivalent) the widespread belief that the accountability system goals were perceived as not pedagogically meaningful, the system's evaluative verdicts unfair, and the causes of underperformance largely located in the schools' external environment. The situation was characterized by an unproductive blame game in which teachers feel solely blamed by their state for performance problems for which they in turn blame external forces. Performance motivation suffers when schools are held accountable for causes of underperformance that are in fact controlled by higher levels of the educational system.

Thus, baseline stabilization, performance measures of low pedagogical meaning, as well as the dubious effect of high-stakes pressures on teachers' job commitment all point to the need for thoroughly rethinking the wisdom of a largely outcome-based accountability system that places the onus primarily on schools.

The Challenge in California

The challenge of school improvement is heightened in California where large performance differentials and unequal conditions of learning between and within schools are a reality in the public school system. Evidenced by a number of reports and recent studies (Cheng, 2001; California Teachers Association, www.cta.org/news/index/; Wasserman, Papazian, & Connor, 2001; Blasi, 2001; Harris, 2002), performance differentials between California schools are apparently associated with large unequal distributions of resources and inputs that put the aforementioned baseline stability of schools at the lower end of the distribution in doubt. Thus, California's challenge is to construct effective accountability and oversight systems that translate

knowledge of inequitable educational conditions and performances into workable strategies for the system's improvement.

Opinions and Conclusions

Based on the evidence available to me, I conclude that the current system of state oversight over California schools has large gaps. These gaps make it difficult for the state to even know where substandard learning conditions in California schools exist and how these unequal conditions specifically affect schools' and districts' performance lags. Without this knowledge, the state cannot correct existing sub-standard conditions. The state presently lacks:

- standards for adequate school operations,
- systematic mechanisms to detect performance barriers, and
- sufficient provision of support and intervention.

Currently, key mechanisms of state oversight are the public school accountability system created by PSAA (http://www.ed-data.k12.ca.us/dev/snapshot2.asp), various program compliance reviews, specifically the coordinated compliance review (CCR), and intermittent fiscal and management assistance supplied by the Fiscal Crisis and Management Assistance Team (FCMAT). Accreditation reviews are conducted by an independent professional agency, the Western Association of Schools and Colleges (WASC). The state also requires schools to publish a School Accountability Report Card. A recently passed High Priority Schools program also contains state oversight mechanisms, but the program is in its initial stages at the time of writing this report.

CCR and WASC have been in existence for some time without seemingly remedying performance deficits and documented unequal learning conditions on a sufficient scale. Meanwhile the state has created a more powerful system through PSAA. The power of this system will be investigated here. It is the Immediate Intervention/Underperforming Schools Program (II/USP) within the PSAA legislation, recently augmented by the High Priority Schools Grant Program (HPSG), that gives the state the option to intervene in below-average schools that post insufficient performance improvement (as measured by the STAR 9 and increasingly by California Standard Tests). So far, after three years of existence, the two low-performing schools programs have enrolled 1,589 schools or about one fifth of all California schools that received an API score. These low-performing schools programs have become indicative of the pervasive performance lags that large numbers of California's children encounter. In the following section, I will investigate to what degree the programs are suited to meet this enormous challenge.

II/USP

For participating schools, II/USP, as presently designed (www.cde.ca.gov/iiusp/), represents a trade-off between voluntary acceptance of accountability and potential sanctions in return for modest, but not trivial, financial support from the state. When schools volunteer for the program, they are given a $50,000 planning grant the first year and $200 per student for two subsequent implementation years. The school contracts with an external evaluator that assists in identifying performance barriers and draws up an action plan for improvement. Failure to make sufficient progress, a category that is currently being defined at the state level, will bring forth sanctions,

the exact nature of which has yet to be determined (as of January 2002). The federal Comprehensive School Reform Demonstration program (CSRD) is folded into II/USP.

The program's primary purpose is to provide underperforming schools with incentives and support necessary to keep up with the rest of the state in the improvement of test scores. The program is the centerpiece of the state's treatment of underperforming schools in the new accountability system. I will show that II/USP is seriously deficient because the program ignores many schools in need, bypasses whole districts in need, ignores districts as contributors to performance problems, and does not capture the systemic character of performance barriers and remedies. Because the state does not use the information contained in the action plans, II/USP cannot inform state policy makers and the public about the nature of the state's performance problems and next policy steps to take. At present, the state is faced with a large number of schools that qualify as underperforming according to the state's definition, but at the time of this writing no systems are in place that could provide intervention in larger numbers of schools that may fail the probationary II/USP period. My own misgivings about the narrow scope of performance assessments notwithstanding, I will use the state's criteria in conducting my analysis, and I will make an attempt to gauge the program's effectiveness in light of the state's own educational goals.

The Program Ignores Many Schools in Need and Allows Many Schools to Bypass Scrutiny

The scope of II/USP is curtailed by its voluntary feature. Being voluntary, schools and districts decide whether they will apply for additional funds in return for scrutiny and threats of further interventions. In Cohort II, only 527 or 56 percent of the 935 eligible schools applied. In Cohort III, of the 1,266 eligible schools, only 765 or 60 percent applied to the program. Thus, almost half of all schools that were identified as underperforming in 2000 and 2001 chose to bypass the program.

The state's funding limitations further curtail the program. At present, the program has resources for only 430 schools yearly, a far cry from the number of eligible schools listed above. So far the program has enrolled 1,290 schools. For Cohort II, only 430 or 45 percent of the eligible schools entered the program. For Cohort III, that percentage is even lower: only 33 percent of the eligible schools participated in the program. If one includes II/USP-eligible Decile 1 schools that will be funded by the recent HPSG program, those percentages rise to 55% for Cohort II and 43% in Cohort III. The result is that many schools that qualify as underperforming according to the state's definition are not supported by the program. But equally as important, their problems also do not register with the state through the channels of this program.

Thus, the scope of the program is limited relative to the state's own educational goals as well as relative to felt needs as indicated by the number of unsuccessful applicants. Not only does the program bypass schools that the system identified as in need of support and scrutiny based on the state's own accountability criteria, but it also leaves unsupported a substantial number of schools that did feel the need to apply. [See Table I in Appendix.]

The Program Bypasses a Number of Districts in Need

II/USP holds participating schools directly accountable. Districts may feel pressure only indirectly as high numbers of low-performing schools become a public embarrassment or the state actually imposes sanctions, such as the takeover of local schools. Districts, for whatever reason, are able to opt out of the program and thus circumvent accountability for low performance altogether, even when they have fairly sizable numbers of eligible low-performing schools.

In fact, among districts that had at least 30 percent of their schools eligible for II/USP in Cohort II or III (that is, 2000 and 2001), or that had at least 20 percent of their schools performing in Decile 1 or 2 of the API, excluding districts with fewer than 10 schools, 16 districts opted not to engage with II/USP at all. Out of those opt-out districts, 5 had more than 50% of their schools eligible for II/USP in Cohort III. Of those choosing to opt out of II/USP, 12 districts actually deteriorated in terms of the number of schools eligible for II/USP. That is, the percentages of II/USP-eligible schools rose from 2000 (Cohort II) to 2001 (Cohort III), in some districts dramatically. Out of the 16 opt-out districts, only 4 districts managed to reduce the number of schools eligible for II/USP from 2000 to 2001. Recently, 1 of the 16 opt-out districts has become involved in a low-performing schools program as a result of its Decile 1 schools being funded through HPSG. Although the number of opt-outs is small compared to the number of participating districts, the program allows a sizable number of districts in performance distress to evade accountability, intervention, and oversight. [See Table II in Appendix.]

The Program Ignores Districts as Contributors to Performance Problems

In line with the whole accountability system in California, II/USP is school-based. Districts are spared scrutiny. But underperforming schools (as defined by the state) are not randomly or evenly distributed across the state, rather they come in clusters. We identified 67 districts with more than 10 schools that had at least 20 percent of their schools in Decile 1 or 2 in 2001 or at least 30 percent of their schools II/USP-eligible in 2000 or 2001. [See Table IIIa in Appendix.] When we analyzed the clustering of II/USP schools further, we found 4 districts in Cohort II that had at least 50 percent of their schools II/USP-eligible, and 14 in Cohort III; 26 districts in Cohort II and 34 in Cohort III had at least 30 percent II/USP eligible schools. Out of these districts, 21 had at least 20 percent of their schools in Deciles 1 and 2. With these criteria, we identified 26 districts as in "high distress" or "high need." These districts had high percentages of Decile 1 and II/USP-eligible schools and, in addition, their percentages of students reading above the 50th percentile ranged at least 10 or more percentage points below the state average. [See Table III in Appendix.] We deleted Cohort I from this analysis since for this cohort eligibility criteria did not include "insufficient growth," and districts with fewer than 10 schools were also not included.

The good news is that in 2001 (II/USP Cohort II), almost 83 percent of the eligible schools from districts that had at least 30 percent or more of their schools eligible were actually enrolled in II/USP. This percentage, however, declined to about 51 percent the following year, leaving many districts with a lack of services and the state without forceful levers of intervention in these districts. However, the recent HPSG program will increase the number of served schools somewhat in these districts.

But even in the case of large numbers of schools of a given district being enrolled in II/USP, the program design with its restricted school site lens makes it difficult to identify district-wide performance problems and to foster appropriate remedies. [See Table III in Appendix.] This is acknowledged repeatedly by state officials in discussions at the State Board of Education (SBE). For example on January 10, 2001 and February 7, 2001, Superintendent of Public Instruction Delaine Eastin repeatedly stated that the lack of district accountability diminishes the effect of the state accountability system (Board minutes at www.cde.ca.gov/board/minutes/).

The Program Ignores the Systemic Character of Performance Barriers and Promotes Remedies Incommensurate to the Task

II/USP asks school sites and their external evaluators to identify performance barriers. Inputs such as instructional materials and teacher qualifications are explicitly mentioned as areas of inquiry (http://www.cde.ca.gov/iiusp/actionplan.html). These performance barriers are to be listed in an action plan that as of 2001 was to be submitted to the state. In the action plan, schools are encouraged to list barriers whose causes are attributed either internally to the school or externally to district action or community conditions, although districts are not directly involved parties in the writing of the action plans. The plans are evaluated based on the coverage of specific barriers, among them *schoolwide and district-wide barriers to improvement in student achievement and underlying causes for low performance, solutions/strategies for overcoming these barriers and underlying causes, and how school and district conditions in the School Accountability Report Card are being addressed, how any lack of certificated qualified teachers is addressed through specific strategies with measurable outcomes* (Guidelines for Developing an Action Plan at http://www.cde.ca.gov/iiusp/actionplan.html).

But paradoxically, remedies for these far-reaching barriers are to be school-based and have to be confined within the limits of the state's per-pupil funding received by the school. Plans that go beyond this frame will be returned to the school for further editing (Wendy Harris Deposition at 87:1-15). In other words, the program discourages remedies for performance barriers that cannot be fixed within the financial frame of $200.00 per student. Superintendent Delaine Eastin may have been mindful of this situation when she stated at the January 10, 2001 SBE meeting that "the current law puts the responsibility on the principal to improve the school, but the principal does not have the authority needed to make the necessary changes. We need to engage and involve the district more" (Board minutes at http://www.cde.ca.gov/board/minutes/).

Our analysis of school action plans shows that there is indeed a mismatch between identified barriers and the frame for suggested remedies. In a random sample of 65 plans from Cohort II (15% of the cohort), almost all plans list barriers that are attributed externally, most often to the district. The strongest emphasis in the plans lies on issues of curriculum and instruction and parental involvement, issues over which a school has some control. But an almost equally strong emphasis is placed on insufficiencies in learning conditions (e.g., lack of qualified teachers, overcrowding) as well as lack of appropriate district policies, resources, and capacity building measures, areas over which a school has little or no control. We excluded those instances when schools conflate barriers with students' low socioeconomic status or low achievement (McKnight & Sechrest, 2001).

In some districts like San Francisco, schools suggest remedies for district barriers, but these remedies are boiler plate formulations that appear in all plans from a given district, or are mere statements of intent with no clear budgets, responsibilities, or time lines attached. But mostly, remedies are school-based, with little hint of the systemic character of the problem. For example, in a number of plans, problems with high teacher turnover are noted and non-competitive salaries districtwide are mentioned as barriers, but, as a solution, schools suggest support programs for beginning teachers. These may alleviate the problem, but certainly won't solve it. [See Table IV in Appendix.]

In summary, the action plans written by the schools demonstrate the crucial importance of district (and state) policies in causing underperformance. Yet, according to the "Guidelines for Developing an Action Plan," schools are to assume responsibility for devising *"solutions/ strategies for overcoming these barriers and underlying causes."* District accountability comes into the picture only "through the backdoor," almost as an added burden to schools. Barriers due to state policies are left entirely unscrutinized.

Apart from the action plans, the systemic nature of performance barriers is also indicated by statistical analyses based on CBEDS. In the majority of the identified 26 high-distress districts, percentages for impact factors, such as Free or Reduced Lunch participation, year-round schooling, or emergency credentials, are substantially higher than for the state as a whole. A similar pattern applies for all II/USP schools, particularly for Free or Reduced Lunch, English Language Learners, and conditions of overcrowding. [See Tables III and V in Appendix.]

If we assume that overcrowding is in large measure caused by a district's inaction or inability to raise matching funds for school construction to relieve overcrowding, and if we assume that teacher turnover is in large measure due to a poor district's uncompetitive salaries and teachers' unpreparedness for teaching traditionally underserved and special needs students, then prime barriers mentioned in the plans would require major policy action regarding school construction, collective bargaining, and teacher education. None could be remedied by II/USP moneys, yet these barriers are among the most pressing problems districts and schools face.

The State Ignores the Information Contained in the Action Plans to Inform Policy and the Public

According to II/USP guidelines for the 2000 and 2001 cohorts, the action plan appears to be the key document for the disbursement of implementation funds. The state department of education reviews the plans. But the actual quality of the suggested improvement strategy is not evaluated. Evaluation of the plans is formal and procedural, rather than substantive (Wendy Harris Deposition at 85:11-86:18, 88:16-90:16; Board minutes April 12, 2000). An acceptable plan must address a set of potential barriers that can easily be "checked off" by the plan raters, but must not suggest remedies that cost more than the funds received through II/USP (California Department of Education, 2000; Wendy Harris deposition at 79:9-23, 85:11-86:9, 87:1-15).

The state does not further process the information contained in the action plans. The state department does not conduct summary analyses, nor does it compile a summary report that could facilitate the identification of systemic, district, or state policy-relevant barriers that go beyond

school control or, in the case of state policy, even local district control (Wendy Harris Deposition at 92:24-93:20, 93:11-23, 94:9-17, 96:15-97:3, 103:16-104:5). The state uses neither the II/USP process for state oversight nor the flow of information from below that could inform policy makers or concerned citizens. Nor does the state department of education conduct analyses of other data that could address systemic district or state barriers to student performance (see Bill Padia Deposition at 52:6-53:15, 56:2-21, 73:11-24, 74:11-75:3). Along the same lines, there is an almost complete absence of information and data analysis on learning conditions and opportunity to learn in the context of the new California High School Exit Exam (Phillip Spears Deposition at 87:12-17, 88:17-25, 89:9-16, 89:24-90:23, 113:1-22). It is ironic, indeed, that the state department exerts pressure on schools to make "data-driven" decisions (see Guidelines for Developing an Action Plan, p.4) when it itself does not make systematic use of data that 1,290 II/USP schools so far have collected for review and enumerated in their action plans.

Should the state use this information, it would become obvious according to our content analysis of action plans that many performance barriers are systemic and caused by district and state action or inaction. This pattern of large district (and state) contributions to performance barriers is produced despite the fact that information-gathering procedures within II/USP are characterized by untrained external evaluators, loose planning templates, and the conflation of school-internal and district barriers in many plans (see Guidelines for Developing an Action Plan). The effect is that valuable policy-relevant information with regard to both performance barriers and the scope of remedies is lost.

The State Has No Systematic Information System in Place (Beyond API Scores)

The fact that the state department of education does not train external evaluators for their job reinforces the unsystematic approach to underperformance. External evaluators are chosen through a written application process in which individuals state their past record of success in improving schools. External evaluators are not specifically trained for their evaluation work (Wendy Harris Deposition at 59:5-60:7, 65:10-66:16; External Evaluators Application, California Department of Education, 1999 at http://www.cde.ca.gov/iiusp). Their role is apparently one of facilitating internal school change. Data collection on performance barriers is done for the school's own consumption, rather than for the purpose of providing the state with pertinent information on more systemic performance barriers.

The state department of education has little information on the quality of the external evaluators' work (Wendy Harris Deposition at 54:18-56:6, 57:18-58:2, 58:17-58:23). The quality of the intervention in schools often hinges on the uneven quality of the external evaluator (Just et al., 2001; Goe, 2001). Since the state has neither adequacy standards for school learning conditions, nor a standardized process of school evaluation within II/USP, evaluation must by default rely on professional "connoisseurship" (Wilson, 1996). Connoisseurship evolves through long experience in the educational system and the ability to form realistic expectations based on comparative experiences across many different school contexts.

It is very difficult to establish the presence of such connoisseurship among external evaluators by way of a superficial application process, as currently used by the state department for external evaluators. A look at the first cohort (these are schools that were not selected based on the

criterion of previous insufficient growth) shows that only 127 schools of the 430 Cohort I II/USP schools fulfilled the state's growth expectations *fully,* that is, they met their API growth target in both implementation years. Discussions at SBE meetings reflect board members' concern about the program's quality (see Board minutes March 7, 2001; July 12, 2001). Yet, the quality of the program does not seem to be monitored closely (Wendy Harris Deposition at 92:24-93:7, 93:11-23; 94:9-17, 96:15-97:3, 103:16-104:5). It is doubtful that a program as loosely crafted as II/USP will actually accomplish the state's ambitious performance goals.

The State's Capacity to Intervene in Schools Failing to Make Sufficient Progress Is Doubtful

At their meeting on February 7, 2002, the SBE passed the so-called "traffic light" method to determine whether Cohort I schools have made enough growth to either exit the program or extend their II/USP status for another year and avert more severe penalties. The traffic light method is a very lenient definition of sufficient growth: only schools that could not avert decline in two consecutive years would encounter intervention. With the traffic light method, the state's original demand for test score growth in low-performing schools above the rates of higher-performing schools is no longer in effect, making the goal of closing the gap between higher and lower performing schools elusive. The traffic light method, however, may reduce the state's intervention burden substantially. If 2001 figures were applied, according to a scenario discussed at the PSAA Advisory Committee, January 17, 2002, only 8 of the 430 Cohort I schools would qualify for more severe interventions because these 8 schools declined in their API in two consecutive years. But only 187 schools met the state's growth target. (Figures quoted from the Agenda Hand-out, PSAA Advisory Committee, January 17, 2002). The majority of schools posted no growth or some positive growth in at least one of the two II/USP implementation years, but did not meet the state's ambitious growth targets. The actual intervention burden will not be known until the 2002 API is calculated. Since some 120 Cohort I schools did not increase their API in the first implementation year, the intervention burden could be much larger than anticipated.

The SBE followed the recommendation of the PSAA Advisory Committee, according to board minutes (http://www.cde.ca.gov/board/minutes/). When the PSAA Advisory Committee discussed this issue at their January 17, 2002 meeting, primary concerns of many committee members in adopting the traffic light system were fairness to schools that managed to grow at all and, most important, doubts about the state's capacity to provide and implement effective interventions for larger numbers of schools. Depositions from various state department administrators resonate with this doubt in pointing to the fact that the state department does not have sufficient capacity to conduct effective interventions (Wendy Harris Deposition at 33:4-21; Eleanor Clark-Thomas Deposition at 160:11-161:4).

At its April 23, 2002 meeting, the PSAA Advisory Committee took up the issue of state intervention and capacity again. In the course of the conversation, it became apparent that the state is insufficiently prepared at this point to provide high-quality intervention in larger numbers of schools. The committee discussed whether criteria for selecting vendors for intervention should be stringent or more loose. Many committee members stressed the need for high-quality intervention as indispensable for the success of the program, but concerns were raised by state department staff about tight time lines for the selection process and insufficient supply of high-

quality intervention teams in the state.

It is too early to tell, but the discussion raised the specter of repeating mistakes that were made with the selection of external evaluators. Again, the attempt to implement the formal structures of the laws with limited state department capacity may compromise the substance of the service, with predictable detrimental effects on already needy schools whose time and resources may again be wasted.

The State Is Weakening Its Resolve in Remedying Performance Shortcomings

While these aforementioned concerns of the PSAA Advisory Committee may make sense given the putative lack of state capacity at present, the traffic light method signals the weakening of the state's resolve to close achievement gaps. To restate, a key mechanism of equalizing unequal educational conditions in an outcome-based accountability system is the capability of the system not only to produce continuous growth in lower-performing schools, but growth at a higher rate so that gaps are closing. The traffic light system, however, triggers sanctions only in case of decline. If a school manages to grow at all or even remains stagnant, it will not be targeted for now. In this way, the state reduces the intervention burden. If the state would have adopted a more stringent method such as calculating "average growth" over the two implementation years, the burden would have been much higher. It is doubtful that the traffic light method will signal the state's continued "resolve with regard to underperforming schools" and its "insist[ence] on improvement" (Superintendent Eastin, SBE minutes, January 18, 2000) to schools and districts.

Waning "resolve" is also indicated by the new regulations that guide the Cohort III II/USP applications. According to the "Guidance for Developing Action Plans and Securing Implementation Funding" for Cohort III (http://www.cde.ca.gov/iiusp/actionplan.html), the state has stepped back from reviewing the plans altogether. Now, only a five-page summary outlining the schools' strategies regarding the use of assessment data, strategies in reading and math, and the use of professional development for standards-based alignment will do to secure funding. The action plans are retained at the school site, and the state retreats to its traditional role of monitoring compliance. The five-page summaries delete any kind of information the state could receive about conditions over which local districts or the state itself has control. It may make sense to change reporting requirements given the state department's lack of capacity to give plans an adequate review, but it moves the state in the wrong direction. Rather than increasing resolve or sophistication for its policies, the state retracts from the oversight needed to ascertain whether and how the state's own ambitious performance goals can be achieved.

"Resolve," however, cannot mean increasing pressure and sanctions on schools because low-performing schools already suffer from serious job commitment problems among teachers that increased sanctions would only exacerbate. "Resolve," in my view, can only mean retaining ambitious goals, addressing the roots of the problems that underperforming schools and districts have traditionally faced, and then forging solutions on all levels of the educational system commensurate to the dimensions of the problems. A recent discussion at the SBE about inexperienced and uncredentialed teachers illustrates the dimensions of one such problem. With regard to teachers' inexperience, a frequently mentioned barrier, Superintendent Eastin stated "that teacher salaries must be increased. Teacher salaries are the elephant in the room. We need

to pay and treat teachers like the professionals they are" (Board minutes, February 7, 2002). Another board member commented that "teacher turn-over is a problem in having all teachers fully credentialed. Some districts will have a hard time with this [new federal - my addition] requirement (Board minutes February 7, 2002).

If outcome-based accountability measures coupled with a modest grant alone are not sufficient to close achievement gaps in a timely manner, as Cohort I data seem to forebode, then it behooves the state to explore ways to complement outcome-based accountability with other measures, such as a more systematic review of schools, more targeted capacity-building, and a reevaluation of districts' and the state's own role in causing performance barriers. If capacity at the state level is currently too low to accomplish these tasks, then a clear time line as to the expansion of necessary functions needs to be established as opposed to retreating from the problems.

In Summary

Rather than being an instrument of state oversight, II/USP appears as a loosely constructed scheme through which the state disburses modest amounts of money to selected low-performing schools in exchange for light scrutiny, vague pressures, and happenstance support that depends on the quality of the external evaluator and the willingness of districts to get seriously involved.

HPSG

The High Priority Schools Grant Program is in its initial stages as of this writing. On the positive side, the program would address the needs of a larger number of the lowest-performing California schools: 758 schools fulfill the eligibility criteria, 425 of those are non-II/USP. A total of 569 schools are funded, 270 of those are II/USP schools, and 299 are additional non-II/USP schools (figures from a direct inquiry at SDE). Thus, HPSG extends accountability to an additional 299 schools beyond II/USP. The 270 schools that are enrolled in both II/USP and HPSG receive an additional $200 for implementation. While originally 102 eligible Decile 1 schools in Cohort II and 95 in Cohort III did not make it into II/USP, HPSG now includes between 80 and 90 percent of those schools. [See Table VI in Appendix.]

The program calls for more district involvement, and contains district accountability mechanisms. Explicitly, schools are to investigate the quality of curriculum, personnel, instructional materials, and facilities and are to formulate remedies in these areas in partnership with their districts. The voluntary feature of HPSG is made more compelling: If a qualifying district declines the state's invitation to participate in HPSG, it is required to publicly provide a rationale for doing so. Follow-up is more intense and multi-staged. Schools that do not grow sufficiently are subjected to yearly review, and districts submit a yearly progress report on their HPSG schools. Apart from sanctions, such as takeover, widened parental choice, charter school conversion, and principal replacement, the state superintendent can direct the district to contract with a school assistance and intervention team and to adopt specific interventions. The school is to report to the assistance and intervention team on the school's progress three times a year. This information is also provided to the state department of education.

But on the negative side, the program exhibits tendencies of inefficiency similar to II/USP:

- Although numbers of served low-performing schools have expanded through HPSG beyond II/USP, still 27 rock-bottom performing schools (i.e. Decile 1 and II/USP-eligible) and the children schooled in them are missed by both HPSG and II/USP. [See Table VI in Appendix.]
- The governor withheld money from the SDE for directing and carrying out the program, exacerbating already limited administrative capacity that has to be spread even more thinly across larger numbers of schools with potentially high intervention need.
- External evaluation has been expanded, but at the same time watered down to the less specific "technical assistance," and the circle of those that can provide this technical assistance has been widened, including the school's own district, which may itself be the source of the schools' performance problems if II/USP action plans are any indication.
- The application guidelines for the grant (http://www.cde.ca.gov/iiusp/hpsg/actionplan.html) state that schools must submit a six-page narrative to the state department that will secure funding; plans are not evaluated by the state department. Again, district and school barriers and improvement tasks are meshed together with no clear distinction of who is responsible for what. In the six-page narrative submitted to the state, only items are listed that directly pertain to the school, with little information retained that could potentially inform policy making: internal monitoring, strategies in math and reading, professional development, parental involvement, provision of instructional materials, and quality staff.
- On the issue of teacher quality, the guidelines suggest a curious approach that is illustrative of the inadequacy of the school-internal lens: the school is to describe "what action [it will] take to reduce the number of uncredentialed and inexperienced teachers to at least the district average" (p.7). Apparently the designers of the program are aware that teacher inexperience is a serious problem at Decile 1 schools. It is understandable that schools *internally* cannot be expected to increase the proportion of experienced teachers beyond what the district context allows, but it is astounding, given the problems that whole districts have with inexperienced teachers, that the "district average" will do as a solution to the school's problem.

While additional funding for low-performing schools is needed, one must be careful not to repeat the mistakes of the past and grant funds to schools without clear ideas of what needs to be done differently in them *and outside them* to change patterns of underperformance. Given the limited scope of the program in comparison to the immense problems many of the lowest-performing schools face, it can be expected that a good number of the currently 569 HPSG schools will be in need of intervention down the road. Counting II/USP and HPSG together, the state faces a potential of 1,589 intervention candidates after only three years of running low-performing schools programs. This makes it necessary to develop a clear strategy of recruiting and training high-quality personnel that can evaluate large numbers of schools and provide skillful support. Structures need to be found that build up capacity and institutionalize these necessary oversight and intervention functions.

The main question practitioners ask when they are confronted with the state's low-performing schools programs is "How is this different from all the other things we have tried before?" The State of California cannot afford to pass up the chance this time to provide guidance, support, and interventions that are truly worth their money and educators' time. The programs are carried out in school environments that are often impacted by low morale and cynicism, but so far the

state's disjointed and inchoate steps of oversight and intervention have shown little regard for this immense challenge.

CCR

This program's potential to detect problems in a school's or district's learning environment and promote appropriate solutions is limited for three reasons: (1) CCR monitors compliance with laws and regulations. To date the state does not have clear regulations defining adequate learning conditions. Without standards of adequacy for learning conditions, a compliance review is impossible. (2) The current CCR process evaluates a district's implementation of specific federal and state programs. State monitors look at schools and districts through the lens of these programs and their rules and regulations. A district or school can be found to have serious deficiencies in its core program with the help of the "integrated program items" that are part of the 467-item CCR evaluation menu (Eleanor Clark-Thomas Deposition at 73:5-13; Coordinated Compliance Review Training Guide 2000-2001), but schools' or districts' core operations come into view only indirectly, through the summation of findings from the various program evaluations. Key elements of a school's core operation, such as availability of textbooks, teacher qualifications, or facilities are not part of the CCR. (3) Studies on the implementation of Federal Title 1 programs have shown that compliance with rules and regulations is a poor mechanism of school improvement (Odden, 1991a; Doyle & Cooper, 1988). For this very reason, both states and the federal government itself have shifted to outcome-based accountability systems with built-in intervention schemes. States, in my view, need to adjust their oversight systems by moving away from compliance reviews to the institutionalization of professional review and advice.

FCMAT

The Fiscal Crisis and Management Assistance Team has accumulated comprehensive tools for evaluating district operations. Standards for proper management and maintenance were developed that the agency uses to evaluate districts. It could be a potentially powerful mechanism of state oversight, but it is used very sparingly and interventions are intermittent. Often follow-up is lacking (Thomas Henry Deposition at 65:10-15, 82:4-6, 466:23-467:9). In most cases FCMAT intervention operates on the basis of local consent. Only a few comprehensive interventions, out of a total of 283, have been done between 1992 and 2002 (FCMAT material: Study Chronology; Thomas Henry Deposition at 7:13-14; 31:25-32:11; 64:7-23). Most interventions are in the areas of management, organization, and finances. It is doubtful that a management consulting agency would have the kind of expertise needed to intervene in issues of curriculum and instruction, but it is conceivable that the role of this agency or one like it could be expanded. A FCMAT-type approach may be particularly powerful in helping districts to maintain baseline stability in their low-performing schools.

Suggestions for Improvement of the Current System of State Oversight

Develop Standards of Adequacy for Learning Conditions and Teaching Practice

Because there are no adequacy standards for educational inputs, learning conditions or educational practices can diverge widely across the state and can potentially deteriorate substantially without notice in some schools and districts. With such standards, schools themselves have the opportunity to evaluate whether their operations are on an adequate level. External reviews are also more fruitful when based on statewide standards. These standards should establish adequate levels of funding, but also other quality indicators, such as availability of instructional material, decent facilities, teacher qualifications, stability of faculty, competence of school administration, etc. Evaluating a school's performance based on multiple indicators should be the goal of all designers of accountability systems. Including school quality indicators into the accountability system would improve the current unsatisfactory situation in California where schools are evaluated on fairly narrow indicators.

Incorporate the "Straightforward" Standards into the Current CCR

Some of these standards lend themselves to a straightforward evaluation of compliance. For example, availability of instructional materials or safe and healthy facilities can be monitored quite easily. These areas could easily be included in the current CCR compliance regime. But this can only be a first step. As was pointed out above, the effect of these kinds of compliance reviews is limited when the goal is a dynamic of continuous improvement in the core of a school's operations. In this case, a more holistic review of a school that integrates learning conditions, practices, and the needs of specific student populations is needed. Such a review not only allows the State to uncover improvement potentials in educators' work performance, but also shortcomings in school capacity and provisions that are controlled by districts or the state.

Expand and Improve the Work of External Evaluators in Underperforming Schools.

Skillful external evaluators are best suited to perform such comprehensive reviews. Thus, I propose to retain the external evaluator feature in the low-performing schools programs, but enhance the quality of their work. External evaluators need to be carefully selected and trained in the application of newly formulated standards and in a more standardized format of school reviews to be developed. In addition to meaningful standards of adequate performance, standards of learning conditions should be a key feature in the work of the external evaluators. It is quite possible that at present the supply of external evaluators who could conduct more sophisticated evaluations is insufficient. But this should not deter the state from setting clear and ambitious goals and develop a time line for the development of a high-quality school improvement infrastructure. In the meantime, the state program could operate with transitional arrangements that can be gradually phased out as fully trained and accredited school evaluators become available.

In addition, the new intervention feature of HPSG legislation makes it likely that the state will face a fairly large intervention burden in the near future. Therefore professionally trained personnel are needed that can augment evaluation with professional advice and can provide support in an unbureaucratic way.

Make the Underperforming Schools Programs Mandatory

The voluntary participation feature of II/USP is expedient for three reasons: (1) it makes the number of schools admitted into the program and thus receiving funding easily adjustable to available funds; (2) buy-in into the program is enhanced when schools are not coerced, but are voluntary participants who accept modest funds for light accountability; and (3) it does not upset traditional power relationships between districts and the state in which the state offers grants as incentives for local districts to engage in specific school improvement activities. But from the point of view of the right of children to adequate schooling, the voluntary participation feature is unfortunate because it leaves unexamined and untouched those schools and districts that chose not to participate and, more important, those that were not selected. Our data have shown that a substantial number of schools and districts in distress are currently not covered by II/USP. Thus I propose to make II/USP mandatory and concentrate limited resources on schools in the most needy API deciles. When evaluation becomes more meaningful and more supportive (see below), it will in all likelihood find acceptance, especially among the highly performing teaching cadre in the low-performing schools.

Hold Districts Directly Accountable.

Our data have shown that district policies and actions are prominently displayed as problems for schools, but districts also play a key role in solving schools' performance problems. It is therefore indispensable for the state to develop mechanisms that hold districts directly accountable for their schools' performance. When, as our data showed, more than a third or more than half of all schools in a given district are not meeting growth targets and when the overall district performance ranges well below the state average, state intervention is indicated. Naturally, when schools labor under faulty district policies, intervention in district affairs is potentially more powerful than interventions in many schools in one district. When districts do not have the capacity to attract good teachers, to build and maintain adequate facilities, or to issue coherent policies, they need help from the state in the form of resources and authoritative guidance.

As was pointed out earlier, after three years of PSAA, II/USP, and HPSG, the state will be faced with providing possible support and intervention for a large number of schools, about 1,500, that will come from the pool of currently designated low-performing schools. If one would add to those numbers unfunded Decile 1 schools and a large number of Decile 2 schools that were originally earmarked for HPSG, then one gets an impression of the enormous potential intervention burden. The problem of underperformance in the state is not restricted to some isolated cases, but is widespread and from all indications systemic. If only about one quarter of all schools fulfill the state's growth expectations, as in the 1999 II/USP cohort, the state faces an immense burden if it intends to do more than just disburse money. Two strategies can potentially reduce this burden: easing up on growth expectations as with the traffic light method which will diminish the need for intervention and contracting out school intervention services to private vendors in the same fashion external evaluators were assembled. Neither approach is very promising in effectively moving low performers to state average, and both are apt to continue the plight of children trapped in below-average schools.

For starters, an alternative approach would concentrate state action on districts in distress. This approach would preserve the limited SDE capacity and use it for more high-leverage

interventions in low-performing districts that are in need of more oversight and support. In the past, the state developed a system of district intervention when a district failed in fiscal matters. This system ought to be extended to cases of academic failure. Compared to school interventions, district interventions are easier and more difficult at the same time. They are easier because they touch upon local policy making, resource allocation, and administration. In these areas, state departments of education have some expertise, as opposed to the area of teaching and learning where bureaucracies are notoriously ill-suited and the profession ought to reign supreme. District interventions are more difficult because districts have power to resist and marshal political forces, whereas schools tend to comply with authoritative measures, though often with minimum enthusiasm.

But despite these difficulties, district accountability and intervention are a necessity, and the state is challenged to develop systems that can effectively do the job. Here again, these systems cannot emerge overnight, but taking experiences with FCMAT as a point of departure, the state should be encouraged to develop a time line for building up its own regulatory and intervention capacity. The state demands schools and districts to tackle performance problems with "no excuses," vigor, and ambition; it should likewise follow suit and not shrink from the task of building a new institutional framework for school improvement.

Create an Independent School Review and District Auditing Agency

Ultimately, an agency is needed that develops, systematizes, and oversees external evaluations, interventions, and support for schools and districts. Such an agency would identify absence or presence of essential inputs with objective indicators. Given limited resources, this agency ought to concentrate its efforts on schools and districts with serious performance deficiencies. It is important that this agency be independent from the direct line of authority within the educational system running from the state through (county offices of education and) districts to local schools. The agency must be able to facilitate reciprocal accountability, that is, it needs to be chartered to uncover shortcomings in state, districts, local schools, and teacher training institutions that become a detriment to children in low-performing schools. This independent agency would organize reviews according to state laws and regulations, mobilize the profession for educational improvements, and make recommendations on required resources, policies, and capacity-building supports to achieve performance goals for students in lagging schools and districts. It would also be involved in the improvement of education. In this capacity, it would shun the bureaucratic approaches (such as compliance reviews) that often characterize state and district interaction with schools. Rather it would attract a cadre of first-rate educators that can inspire other educators to search for pedagogically sensible solutions. Thus, such an agency should mediate between principles of public administration (e.g., standardization, formalization) and education (e.g., personalization).

The agency would train external evaluators who can distinguish between site-internal, district, and state barriers and identify systemic problems related to districts and the state. Districts are evaluated when systemic performance problems are identified. The work of evaluation would focus on discovery of "improvement potential" rather than judgment as in the case of the English inspectorate (Wilcox & Gray, 1996; Grubb, 2000). Schools would be evaluated, but subsequently supported in the implementation of their improvement strategies, either by the agency itself or by

suitable consultants. Suggested remedies would be mindful of a school's instructional coherence (Newmann, Smith, Allensworth & Bryk, 2001; Mintrop, Gamson, McLaughlin, Wong & Oberman, 2001). Reports would be compiled that inform district and state policy and the public. Through the work of the agency, parent organizations and advocacy groups could use authoritative reports issued by a legitimate public agency to gain information to press for the improvement of local schools, but also lobby for local and state policies.

Like the Office for Standards in Education in England, the agency would contract the actual evaluation work to private bidders with proven track records and train them in the standards and procedures of district and school evaluations. The agency would draw personnel from the ranks of experienced district managers, school administrators, and exceptional teachers. It would be built up over several years. Its development would be accompanied by research-based design experiments that serve to identify model practices of review and support. Initial financing could perhaps come from planning money given to individual schools under II/USP and other programs, as well as research and evaluation funds that now go to individual districts.

With PSAA, the state created an accountability system that rearranged the business of public education, but the job is incomplete. Outcome-based accountability, as restricted as it currently is, needs to be complemented with reviews of schools, districts, and state policies. Intervention needs to be more systematic, coherent, and of *high quality.* A bold step in institution-building is needed that mobilizes local policy makers, the teaching profession, and advocacy and community groups.

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APPENDIX

Table I. Number of Schools Eligible, Applied and Selected for II/USP and HPSG
(Cohort II and Cohort III)

	II/USP Eligible	II/USP Applied	II/USP Selected	Percent Eligible Selected for II/USP	HPSG Participation	Total % Eligible for II/USP Funded*
Cohort II	935	527	430	45%	92	55%
Cohort III	1266	765	430	33%	78	43%

***Eligibility requirements for Cohort 2 and 3 - Schools ranking in Deciles 1-5 that did not meet their growth targets*.**

* Schools selected for II/USP or participating in the HPSG program receive state funds. The total percent receiving funds is calculated by taking the sum of the number of schools selected for II/USP and the number of schools participating in the HPSG program divided by the total number of schools eligible for II/USP.

Legend

ELL: English Language Learners

YR: Year Round Schools

Full: Full Credentialed Staff

Emer: Emergency Credentialed Staff

Table II. Districts Opting Out of the II/USP Program

	Cohort 2		Cohort 3			District Demographics					Star Data		
Increasing II/USP Eligibility	**% Schools Eligible**	**% Schools Applied**	**% Schools Eligible**	**% Schools Applied**	**Point Diff**	**% Free & Red. Lunch**	**% ELL**	**% YR**	**% Full**	**% Emer**	**% at or above 50% in reading 1999-2000**	**% at or above 50% in reading 2000-2001**	**Number and (percent) decile 1 schools funded by HPSG**
State Average	n/a	n/a	n/a	n/a	n/a	**47%**	**25%**	**10%**	**86%**	**12%**	**42%**	**44%**	
Paramount Unified	7	0	86	0	-79	79	46	86	63	34	**- -**	**- -**	7 (100)
El Monte City Elementary	6	0	56	0	-50	87	56	0	74	21	**- -**	**- -**	2 (100)
Hesperia Unified	19	0	56	0	-37	50	9	0	85	12	**- -**	**- -**	none eligible
Hueneme Elementary	18	0	55	0	-37	70	43	0	89	6	**-**	**-**	none eligible
Covina-Valley Unified	23	0	54	0	-31	42	13	0	77	16	**0**	**-**	none eligible
Manteca Unified	11	0	37	0	-26	28	9	10	89	8	**-**	**-**	none eligible
Riverside Unified	13	0	39	0	-26	47	16	34	88	8	**0**	**0**	none eligible
Lincoln Unified	18	0	36	0	-18	40	19	0	88	6	**+**	**+**	none eligible
Fullerton Elementary	5	0	21	0	-16	41	28	0	91	7	**+**	**+ +**	1 (0)
East Whittier City Elem	15	0	31	0	-16	35	22	0	78	19	**+**	**+**	none eligible
Tracy Joint Unified	13	0	27	0	-14	27	13	3	87	8	**+**	**+**	none eligible
Val Verde Unified	30	0	40	0	-10	55	21	0	73	21	**-**	**- -**	none eligible
Decreasing II/USP Eligibility													
Garden Grove Unified	38	0%	31	0%	7	51	58	0	94	5	**-**	**-**	none eligble
Santa Maria-Bonita Elem	21	0%	7	0%	14	79	54	93	98	2	**- -**	**- -**	none eligible
Whittier City Elementary	46	0%	23	0%	23	58	38	0	74	24	**- -**	**-**	none eligible
Salinas City Elementary	31	0%	8	0%	23	72	40	0	88	7	**- -**	**-**	none eligible

* All district demographics based on 2000-2001 figures

STAR DATA KEY

0 = at state level

"+" = 1-10 points above state level

"+ +" = 11-20 points above state level

"-" = 1-10 points below state level

"- -" = 11-20 points below state level

Legend

ELL: English Language Learners

YR: Year Round Schools

Full: Full Credentialed Staff

Emer: Emergency Credentialed Staff

Table III. Characteristics of High Distress Districts

		50% + eligible	**II/USP schools**	**30% - II/USP schools**	**50% eligible**	**District Demographics**					**STAR Data**	
District	(2001) 20% or above in deciles 1 and 2	Cohort 2	Cohort 3	Cohort 2	Cohort 3	% Free Reduced Lunch	% ELL	% YR	% Full	% Emer	% at or above 50% in Reading in 1999-2000	% at or above 50% in Reading 2000-2001
State Levels						**47%**	**25%**	**10%**	**86%**	**12%**	**42%**	**44%**
Alum Rock Union	X				X	65	53	0	66	27	25	28
Anaheim Elementary		X			X	85	62	100	85	17	26	28
Azusa Unified		X			X	68	41	0	76	19	24	26
Coachella Valley Unified	X			X		86	71	37	67	55	12	15
Compton Unified	X			X		71	61	0	37	21	16	19
El Monte City Elementary			X			87	56	0	74	13	29	32
Fontana Unified	X		X			75	34	61	80	2	22	24
Fresno Unified	X		X			73	31	26	94	2.2	27	27
Grant Joint Union High			X			56	19	0	78	20	25	28
Kern Union High		X			X	41	12	0	84	17	26	28
Los Angeles Unfied	X					74	43	36	72	19	25	29
Lynwood Unified	X			X	X	76	53	0	57	42	19	21
Madera Unified			X			72	39	53	92	7	27	28
Montebello Unified	X			X		74	46	18	71	22	19	23
Oakland Unified	X			X		54	36	55	74	9	24	26
Ontario-Montclair Unified	X					78	51	45	72	18	22	24
Oxnard Elementary	X			X		71	49	77	88	9	31	33
Pajaro Valley Joint	X				X	54	45	24	85	12	28	28
Paramount Unified	X		X			79	46	86	63	34	17	18
Salinas City Elementary	X			X		72	40	0	88	7	30	34
San Bernardino City Elementa	X	X				75	25	70	80	17	25	27
Sanger Unified	X		X			61	23	0	90	8	31	30
Santa Ana Unified	X				X	70	66	56	79	17	19	21

Legend	**Table III. Characteristics of High Distress Districts**											
ELL: English Language Learners												
YR: Year Round Schools												
Full: Full Credentialed Staff												
Emer: Emergency Credentialed Staff												
OPT OUTS												
		50% + eligible	**II/USP schools**	**30% - II/USP schools**	**50% eligible**	**District Demographics**					**STAR Data**	
District	(2001) 20% or above in deciles 1 and 2	Cohort 2	Cohort 3	Cohort 2	Cohort 3	% Free Reduced Lunch	% ELL	% YR	% Full	% Emer	% at or above 50% in Reading in 1999-2000	% at or above 50% in Reading 2000-2001
State Levels						47%	25%	10%	86%	12%	42%	44%
Hueneme Elementary			**X**			69	43	0	89	6	37	41
Manteca Unfied					**X**	28	9	11	89	8	40	41
Val Verde Unified				**X**	**X**	55	20	0	73	21	32	33

Table IIIA. High Distress Districts

		50% + eligible	II/USP schools	30%-50% II/USP eligible schools				
District	(2001) 20% or above in decile 1 and 2	Cohort 2	Cohort 3	Cohort 2	Cohort 3	Opt-Out	% at or above 50% in Reading 2000	% at or above 50% in Reading 2001
ABC Unified					X		+	+
Alum Rock Union Elementary	X				X		- -	- -
Anaheim Union High Count		X			X		- -	- -
Azusa Unified Count		X			X		- -	- -
Bakersfield City Elementary			X				-	- -
Bellflower Unified Count				X	X		-	-
Central Unified					X		-	- -
Coachella Valley Unified Count	X			X			- -	- -
Compton Unified Count	X			X			- -	- -
Covina-Valley Unified			X			-	0	-
East Whittier City Elementary					X	-	+	+
El Centro Elementary					X		-	-
El Monte City Elementary			X			-	- -	- -
El Rancho Unified					X		- -	- -
Fontana Unified	X			X			- -	- -
Fresno Unified Count	X			X			- -	- -
Garden Grove Unified Count				X			-	-
Gilroy Unified				X			-	-
Grant Joint Union High				X			- -	- -
Hacienda la Puente Unified					X		-	-
Hawthorne Elementary				X			- -	- -

LEGEND

0 = at state level

" **+** "= 1-10 points above

"**-**" = 1-10 points below

" **- -** " 10-20 points below

Table IIIA. High Distress Districts

		50% + II/USP eligible		30%-50% II/USP eligible				
District	(2001) 20% or above in decile 1 and 2	Cohort 2	Cohort 3	Cohort 2	Cohort 3	Opt-Out	% at or above 50% in Reading 2000	% at or above 50% in Reading 2001
Hayward Unified Count				X	X		-	-
Hesperia Unified			X			-	-	-
Hueneme Elementary			X			-	-	-
Jurupa Unified				X			- -	- -
Kern Union High Count		X			X		- -	- -
Kings Canyon Joint Unified					X		- -	- -
Lancaster Elementary			X				-	-
Lincoln Unified					X		+	+
Lodi Unified				X			-	-
Los Angeles Unified	X						- -	- -
Lynwood Unified Count	X			X			- -	- -
Madera Unified			X				- -	- -
Manteca Unified					X	-	-	-
Merced City Elementary				X			- -	-
Modesto City Elementary				X	X		-	-
Montebello Unified Count	X			X			- -	- -
Moreno Valley Unified					X		-	-
Mountain View Elementary			X				- -	- -
North Sacramento Elementary			X				- -	- -
Oakland Unified Count	X			X			- -	- -

LEGEND

0 = at state level

" **+** "= 1-10 points above

"**-**" = 1-10 points below

"**- -** " 10-20 points below

Table IIIA. High Distress Districts									
		50% + II/USP		30%-50% II/USP					
District	(2001) 20% or above in decile 1 and 2	Cohort 2	Cohort 3	Cohort 2	Cohort 3	Opt-Out	% at or above 50% in Reading 2000	% at or above 50% in Reading 2001	
Oxnard Elementary	X			X			- -	-	
Pajaro Valley Joint Unified	X				X		- -	- -	
Palm Springs Unified					X		-	-	
Paramount Unified	X		X			-	- -	- -	
Pasadena Unified					X		-	-	
Pittsburg Unified					X		-	- -	
Pomona Unified				X	X		-	- -	
Ravenswood City Elementary					X		- -	- -	
Rialto Unified				X			- -	- -	
Riverside Unified					X	-	0	0	
Salinas City Elementary	X			X		+	- -	-	
San Bernardino City Unified	X	X					- -	- -	
Sanger Unified	X		X				- -	- -	
Santa Ana Unified	X				X		- -	- -	LEGEND
Santa Rosa Elementary					X		+	+	0 = at stat
Santa Rosa High					X		+	+	0 = at stat
Stockton City Unified			X				- -	- -	" + "= 1-1(
Ukiah Unified			X	X			-	-	" - -" 10-2(

Table IIIA. High Distress Districts		50% + II/USP		30%-50% II/USP				
District	**(2001) 20% or above in decile 1 and 2**	**Cohort 2**	**Cohort 3**	**Cohort 2**	**Cohort 3**	**Opt-Out**	**% at or above 50% in Reading 2000**	**% at or above 50% in Reading 2001**
Val Verde Unified				**X**	**X**	**-**	**-**	**- -**
Vallejo City Unified					**X**		**-**	**-**
Victor Elementary					**X**		**+**	**+**
Visalia Unified			**X**				**-**	**-**
Washington Unified				**X**			**- -**	**-**
West Covina Unified				**X**			**-**	**-**

LEGEND

0 = at state level

0 = at state level

"**-**" = 1-10 points below

"**- -** " 10-20 points below

Table IV. Content Analysis of School Action Plans (Based on 65 Cohort II Plans in High Distress Districts)

Facilities		Resources			District			Personnel				Curriculum and instruction					Teacher Capacity		School Culture				Parents and Student Behavior	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
						x		x				x	x	x		x			x					x
x	x					x					x	x	x	x		x			x		x			x
								x					x	x		x				x				x
x			x	x										x		x		x						x
		x			x	x					x			x									x	
		x	x	x	x	x					x		x	x	x								x	x
		x		x				x	x	x				x	x									
					x		x						x			x		x					x	x
		x		x		x	x				x			x	x	x			x	x		x		x
x		x	x	x	x	x	x	x	x			x	x	x	x	x		x	x	x	x	x	x	x
x		x	x	x			x	x	x	x		x	x	x	x	x		x	x	x	x	x	x	
x		x	x	x		x	x		x	x			x	x	x	x		x	x	x	x	x	x	x
					x		x						x		x			x	x	x		x		
x												x				x		x						
x	x			x	x				x				x	x					x	x				x
						x							x		x	x				x				
		x				x	x	x	x			x	x*	x	x	x								x
	x											x	x	x	x	x								x
					x	x	x	x	x				x*	x	x	x	x	x		x		x		x
					x	x	x	x	x			x				x			x					x
						x				x	x	x		x	x	x						x		x
		x			x	x	x		x				x*	x	x	x						x		x
												x		x	x	x	x							
					x	x	x	x	x			x			x	x	x	x	x	x		x		x	x
x		x	x		x	x	x	x				x	x	x	x	x	x	x		x				x
x	x				x	x		x	x		x	x		x	x		x			x			x	x
							x	x	x			x	x*	x	x	x		x		x			x	x
	x	x			x	x	x	x	x*			x				x		x		x				x
	x			x	x	x	x	x	x*			x	x*	x	x		x	x						x
	x			x	x	x	x	x	x			x	x*	x	x	x			x	x		x	x	x
						x	x		x*			x	x*	x	x		x	x						x
						x	x		x*			x	x*	x	x	x	x	x					x	x
x	x											x	x*	x	x	x	x	x						x
x		x			x	x	x					x	x		x	x							x	x
					x	x			x*					x				x						x
		x							x*		x			x				x						
		x											x	x	x			x						
		x												x	x	x		x						
x				x				x	x											x			x	x
									x															
								x						x	x	x				x				
												x	x	x	x	x					x			
								x	x	x	x	x		x	x	x								
							x				x	x		x	x	x								
				x				x	x							x				x				
												x	x	x	x	x					x			x
													x*		x	x						x		
										x		x	x*	x	x	x			x					
																			x		x		x	
			x	x				x			x	x						x						x
			x	x				x				x		x		x		x		x	x		x	x
		x							x	x	x				x			x						
				x					x			x					x	x		x				x
			x	x			x	x	x		x	x								x			x	x

Key:

1. Inadequate Facilities
2. Overcrowding
3. Limited Resources
4. Lack of Technology
5. Lack of Instructional Materials
6. Insufficient District Curriculum
7. Inadequate District Guidance and Support
8. Inadequate District Provision of Professional Development
9. Insufficient District Recruitment of Teacher/Administrator
10. Lack of Quality Teachers and Substitutes
11. Lack of School Support Staff
12. Lack of Skillful School Specialist
13. Inadequate Instructional School Program (curriculum)
14. Limited Data Analysis Capacity
15. Problems with Instructional Program at School
16. Lack of Alignment
17. Problems with Instructional Delivery
18. Lack of Collaboration Time
19. Lack of Professional Development at School
20. Poor School Vision
21. Low expectations
22. Low Teacher Moral
23. Ineffective Administration
24. Lack of Safe & Orderly Environment
25. Parent Involvement Issues

Table V. II/USP School Characteristics (Cohort II)

N=381

	State Average (In Percent)	II/USP Schools (In Average)
Free & Reduced Lunch	47	71
English Language Learners	25	36
Year Round Schools	10	22
Full Credentialed	86	81
Emerency Credentialed	12	14

Table VI. Number of Decile I II/USP Schools Eligible and Selected for High Priority Schools Program

	Total Number of Non-Participating* II/USP Schools	Total Number of Schools Being Served by HPSG	Percent of Non-Participating Decile 1 II/USP Schools Served by HPSG
COHORT II	102	92	90%
COHORT III	95	78	82%

*Non-participating refers to Decile 1 schools that either did not apply for the II/USP program or applied for the II/USP program and were not accepted.

Table VII. Total Number of Intervention Candidates

Total II/USP Selected	Additional HPSG Selected	Total
1290	299	1589