Educational Service Agency Accountability and Accreditation: Is a National System Needed?

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Acknowledgements

As states across the nation have initiated discussions regarding accountability systems for Educational Service Agencies, the need for data regarding the status of accountability efforts and summary of best practices became apparent. The AESA Executive Council Foundation recognized this need and approached the AESA Foundation. The Foundation Board members made funding for a national accountability research study their top priority. Learning Point Associates, a nonprofit education research organization with offices at Chicago, Naperville, New York, and Washington, DC, was selected to conduct the study.

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Study Context

Across both the federal and state contexts, the push for greater accountability is currently exerting significant influence on educational agencies from local schools to state departments of education. Both state and federal policymakers are no longer content with knowing what resources and strategies are being used in government programs; they also want to be able to measure results. The No Child Left Behind (NCLB) Act and its focus on making adequate yearly progress is the most visible representation of this push, but states and the federal government have embraced other initiatives to measure the impact of education programs from preschool through postsecondary education.

Educational service agencies (ESAs) across the country have begun to embrace this movement toward accountability. Several states have implemented state accreditation and accountability systems designed to monitor ESA performance. States also have begun to sponsor report cards on the operation and impact of ESAs. Still other state ESA networks and individual ESAs have been voluntarily moving toward accountability by providing annual profiles of the services they offer, instituting advisory committees, and making a concerted effort to measure performance. In addition, ESAs often have implemented their own systems to check customer satisfaction and alignment with the needs and services identified by their local education agencies (LEAs).

Despite this movement at the state level, no regional or national organization has established standards or benchmarks against which the performance of ESAs can be measured. The Association of Educational Service Agencies (AESA) currently is considering if and how it might provide leadership in this area. This report is designed to inform this discussion. It summarizes the main findings of the accountability and accreditation study conducted by Learning Point Associates. The report describes the current status of state accountability and accreditation systems and draws on the literature on best practices in accountability and lessons from state accountability and accreditation systems to discuss issues that would have to be considered if AESA were to move forward in implementing a national accountability or accreditation system.
Study Methodology

AESA contracted with Learning Point Associates, a nonprofit education research organization, to conduct a national study of ESA accountability and accreditation initiatives. The purposes of the study are to provide a picture of the current state of ESA accountability and accreditation policies in AESA states, provide insight into whether AESA should play a role in the development of a national accountability or accreditation system, and investigate some of the system design decisions AESA would have to consider if it decided to pursue a national accountability system, including identifying the types of core services for which ESAs should be held accountable, determining performance measures, and establishing standards or benchmarks. To this end, the research team completed a thorough review of the research literature on accountability and accreditation, administered a national inventory on state approaches to ESA accountability or accreditation, and conducted case studies in five states that have adopted innovative approaches to ESA accountability or accreditation. This Methodology section briefly describes each of these study components, the limitations of the study, and an overview of the structure of the report.

Literature Review

The research team conducted a systematic review of the research literature on accreditation and accountability in prekindergarten through postsecondary education in order to answer two questions:

- What is the impact of implementing an accreditation or accountability system?
- What does the past experience of other educational institutions tell us about the best way to design an accreditation or accountability system?

To tap into research on the impetus for adoption, best practices, and the impact of accreditation or accountability, an in-depth online search was conducted to identify relevant peer-reviewed and nonpeer-reviewed journal articles and agency reports. Several education and social science databases were utilized to search for pertinent research published between 2000 and 2008, with the most relevant articles obtained from the ERIC and FirstSearch search engines. In addition, the AESA website provided access to Perspectives, AESA’s annual research journal. Primary search keywords included accreditation, accountability, higher education, K–12 education, early education, best practices, standards, private school, public school, charter school, institutional quality, and institutional evaluation.

After gathering all of the potential articles and reports, the research team created an internal database to store and categorize relevant literature. The data-entry forms allowed the team to classify research reports by name/title, origin, and date, along with the full citation. Team members wrote brief descriptions of the 50 included studies and reports—incorporating existing abstracts in the majority of cases—and identified those characteristics associated with impetus for adoption, best practices, and impact, if appropriate.
After the literature search and review were completed, the research team looked across the selected articles to group attributes along the broad themes of impetus for adoption, best practices, and impact.

**National Inventory**

In an effort to provide a comprehensive picture of ESA accountability and accreditation policies implemented across AESA states as well as to gauge interest in a national accreditation or accountability system, the research team administered a national inventory. The inventory included two sections. The first section gathered information about ESAs in each state as well as each state’s approach to accountability or accreditation. To ease the burden of administration, the team prepopulated data in this section of the inventory, to the extent possible, from publicly available sources. The second section of the inventory asked respondents to provide opinions about the desirability of implementing a national accountability or accreditation system and to weigh the importance of various components of such a system.

The research team worked with AESA to identify a contact person in each state to complete the inventory. These individuals received an e-mail from the research team that contained a personalized link and password that allowed them to access an inventory online that had been prepopulated with publicly available information on their state. The research team carefully monitored inventory completion and worked with AESA to follow up with state contacts to provide technical assistance and increase the inventory response rate. Data were collected from 42 of the 45 AESA states.

Data from the first section on the inventory were analyzed inductively using a qualitative software program. This analysis allowed the research team to identify similarities and differences in ESA structure and accountability and accreditation policies nationally. Data from this section of the inventory also were merged into a database that will allow AESA to search the information by state, region, or keyword, providing AESA with a rich picture of the context in which any national accountability or accreditation picture would be implemented.

Data from the second section of the inventory were analyzed using a quantitative software program. The research team created scale scores using Rasch modeling to weight the responses individuals gave to each fixed-response inventory item. This allowed the research team to gauge respondents’ interest in a national accountability and accreditation team and how important they believe certain components of such a system would be.

**Case Study**

The research team worked with AESA to identify five states that are in the process of implementing innovative approaches to ESA accountability and accreditation. The case study component of the policy study focuses on approaches to accountability being implemented in Iowa, Michigan, Texas, Georgia, and New York.

In each of these states, AESA identified an initial contact person. The research team interviewed the state contact using a semi-structured interview protocol. During the interview, the contact
person was asked to describe the accountability system in place, provide a history of why the state had adopted a particular approach, discuss the strengths and weaknesses of the approach, and identify lessons that would inform a national accountability or accreditation system. At the close of the interview, the individual was asked if there were other individuals in the state whom the research team should contact to learn more about the system. The individuals identified were then contacted and interviewed using the same semi-structured protocol. This allowed the research team to learn about the state’s approach to accountability and accreditation from a variety of perspectives.

Across the five states, the research team conducted 15 interviews. Interview respondents included contacts at ESAs in the states, individuals with leading roles in state ESA associations, and district administrators. To supplement the interviews, the research team collected available documentation on each state’s system, including legislation, policy manuals, and sample accountability or accreditation reports.

Data from the interviews and available documents were systematically analyzed to create a description of the accountability or accreditation system in each state. The research team looked across the states to identify points of similarity as well as areas in which the states differed.

**Limitations**

This policy study was carefully designed to provide both a global and detailed picture of the current state of ESA accountability and accreditation policies grounded in an understanding of the research on best practices in accountability and accreditation. However, as with all studies, this approach has its limitations.

Learning Point Associates worked closely with AESA to identify states to profile in case studies and contacts for both administration of the inventory and case study interviews. Although this proved to be exceedingly valuable in assisting in data collection, it is worth noting that individuals and states in close contact with AESA are likely different from those not in as close contact. As a result, neither the case study nor inventory results can be viewed as wholly representative of ESAs nationally. Rather, they provide a picture of accountability and accreditation in states and ESAs that work more closely with AESA. Notably, these states are also those most likely to participate in a voluntary national accountability and accreditation system through AESA. It should be noted also that ESAs, because they are often not bound by uniform reporting requirements, may not have standard ways of accounting for services, staff, or funding. This lack of standardization limits the ability to aggregate data and draw conclusions based on the data.

In addition, it is important to note that the purpose of this report is to provide a description of the current state of ESA accountability and accreditation as well as summarize the research on best practices in accountability and accreditation. It is not a study of the effectiveness or impact of any particular ESA accountability or accreditation system or accountability or accreditation systems in education generally. If AESA moves forward with implementing a national system, such an evaluation would be very valuable.
Structure of the Report

The report weaves together findings from the literature review, national inventory, and case studies to provide insights and recommendations to AESA as it considers its role in implementing a national system. We begin by discussing the evidence from the literature review, case study, and inventory on whether AESA should play a role in the creation of a national system. From there, we turn to the key design decisions that must be addressed in creating an accountability or accreditation system: goals, performance indicators, rewards and sanctions, communication, support, and evaluation. These design decisions are discussed generally and then each is taken up separately, drawing insights from the literature review, national inventory, and case study. We conclude by summarizing findings and providing recommendations to AESA as it moves forward.

Throughout the report, descriptions of the case study states (Iowa, Michigan, Georgia, Texas, and New York) are presented. These descriptions are intended to provide concrete examples of how states address accountability and accreditation of ESAs and to ground the discussion in the report.
Considering a National System

Educational agencies from local schools to state departments of education are increasingly being held accountable for the efficacy of the services they provide. ESAs have not been immune to this movement. States have increasingly adopted approaches to hold ESAs accountable, not only for the services they provide but also for the quality and effectiveness of those services. Should AESA move toward instituting a national accountability or accreditation system? A key consideration in answering this question is what value an accountability or accreditation system adds. We consider this question in this section, drawing on data from the literature review, case study, and national inventory.

Support From the Research

Very little research has been conducted on the impact that accreditation and accountability have had on educational service providers, districts, schools, or students. The strongest evidence for the impact of implementing an accountability system comes from a longitudinal study of the National Association for the Education of Young Children (NAEYC) child care accreditation process (Whitebook, Sakai, & Howes, 1997). The findings from this study were mixed, but generally positive, as follows:

- Centers that become NAEYC-accredited demonstrate higher overall classroom quality at the time of starting the accreditation process and show greater improvement in overall quality ratings, staff-child ratios, and teacher sensitivity scores than centers that seek accreditation but do not achieve it.
- Approximately 40 percent of NAEYC-accredited centers continue to be rated as mediocre in quality despite those improvements.
- NAEYC-accredited centers are no more likely than nonaccredited centers to meet the needs of English language learners.
- Nonprofit status, higher wages paid to teaching staff, and retention of skilled teachers in combination with NAEYC accreditation are predictors of high quality in child care centers.
- Centers that receive intensive support—including on-site technical assistance from an early-childhood professional, custom-designed training for staff and directors, funds to confer release time for staff participating in training, and an ongoing facilitated support group for directors—achieved accreditation at more than twice the rate of centers that receive moderate support or seek accreditation independently. This is 10 times the rate of centers that receive limited support (Whitebook et al., 1997).

Some anecdotal evidence on the impact of these systems is beginning to accumulate as well. For example, Grissmer and Flanagan (1998) found that an accountability system designed to hold schools accountable for student performance played a role in boosting student achievement in North Carolina and Texas. In a study examining community colleges, Sorensen (1998) found a positive relationship between the development of institutional effectiveness indicators and institutional change and improvement.
Stephens and Keane (2005) also identified several potential benefits that accreditation and performance measurement can have on educational institutions and service providers, as follows:

- Improved possibility that problem areas can be better identified
- Enhanced feedback on the performance of programs and policies
- Improved priorities in the allocation of funds and personnel
- Improved community involvement in establishing priorities
- Improved potential to provide answers to the questions “Who are the clients?” “Their demographics?” “Their presenting problems?” “What services are they receiving?” “In what amounts?” “What is the level of service quality?” “What results are being achieved?” and “At what cost?”

**Value in Case Study States**

The strengths of accountability and accreditation systems identified in the literature review are consistent with some of the themes mentioned in interviews with stakeholders from states that have embraced systems of accreditation or accountability. Interview respondents across the five case study states were generally positive about the system implemented in their states.

The stakeholders stressed that the accountability or accreditation systems helped ESAs focus on their core goals and reflect on performance. As one respondent put it, the accountability system allows ESAs “an opportunity … to do a self-reflection about [the] organization and really focus on areas [the ESA] felt [it] needed to improve on.” Accountability and accreditation systems require ESAs to identify their goals and measure progress toward reaching those goals. Interview respondents thought this was a valuable exercise in focusing the efforts of ESAs.

Similarly, several interview respondents noted that accountability and accreditation systems helped move ESAs in their state toward more consistency. In the past, ESAs in these states had operated relatively independently. The accountability and accreditation systems helped define the common goals and services all ESAs should provide.

In Iowa, this move toward consistency was specifically described as an effort to increase the equity of services across the state, especially in rural areas. One respondent described the effect of the state’s accreditation system in this way:

I think that what you had is an intersection of some major demographic shifts in certain parts of the state, in terms of loss of rural populations. At the same time, you had heightened accreditation requirements for AEsAs who said they weren’t big enough and didn’t have enough resources at that point to provide the services at this level of quality for the folks in their region. So they’ve elected to merge with other organizations. I wouldn’t say the accreditation system was formed for that, but I think it has really nudged that process along like it probably should have. It has nearly eliminated the problem that we were trying to address, and that is the legislators who were comparing us one against the other.
Interview respondents across the case study states also noted that the accountability or accreditation systems served an important public relations role for ESAs. By clearly articulating the goals of ESAs and measuring performance, the accountability and accreditation systems allow ESAs to publicly describe the work they are doing in a more coherent way. Interview respondents reported that these efforts have been helpful with procuring state funding and answering questions about the value ESAs provide to schools and school districts.

**Support Nationally**

In addition to gathering information about the current state of accountability and accreditation efforts in AESA states, the national inventory was designed to also gauge interest in implementing an accountability or accreditation system. As can be seen in Table 1, the majority of inventory respondents reported that there is at least some need for a voluntary national accountability or accreditation system. Roughly 27 percent of respondents thought there was a great need for such a system.

<table>
<thead>
<tr>
<th>To what extent do you think there is a need for a voluntary national accountability or accreditation system for ESAs? (n = 33)</th>
<th>Not at All</th>
<th>To a Minimal Extent</th>
<th>To a Moderate Extent</th>
<th>To a Great Extent</th>
</tr>
</thead>
<tbody>
<tr>
<td>18.2%</td>
<td>21.2%</td>
<td>33.3%</td>
<td>27.3%</td>
<td></td>
</tr>
</tbody>
</table>

**Implications for AESA Policy**

Evidence from the literature review and case study suggests that a well-designed accountability and accreditation system can be valuable in focusing organizational attention on important goals, improving organizational performance and consistency, and building public support and understanding. This message is reinforced by states around the country that are moving to institute accountability and accreditation systems. In addition, a majority of state contacts who completed the inventory agree that there is a need for a voluntary national accountability or accreditation system for ESAs. Taken as a whole, this evidence suggests that AESA is wise in considering the implementation of such a system for ESAs and contemplating the role it should play. The remainder of this report draws on evidence from the same data sources to consider what such a system should look like.
Designing an Accreditation or Accountability System

In considering the implementation of a national accountability or accreditation system, AESA must address a variety of design decisions that will impact how the system operates as well as its effectiveness in improving ESA performance nationally. Data collected through the literature review provided guidance on the key design decisions AESA must address. Perie (2007) identifies the following seven core concepts that any accreditation or accountability system must address:

- **Goals.** Accountability systems should be driven by focused, attainable goals that are well articulated and communicated.

- **Performance indicators.** Performance indicators should be directly tied to the goals; incorporate data from multiple sources; and include data elements that allow for interpretations of student, institution, and administrative performance.

- **Design decisions.** As with the performance indicators, decisions about how to design the accountability system need to be aligned with the overarching goals.

- **Consequences (sanctions and rewards).** Accountability systems may need to involve both rewards and sanctions to motivate participants.

- **Communication.** Successful accountability and accreditation systems depend on clear communication with a variety of stakeholders.

- **Support.** State, district, and school agents need to provide the necessary support to develop the accountability plan and resources that ensure that goals can be met.

- **System evaluation, monitoring, and improvement.** Mechanisms need to be instituted to determine how the accountability system will be monitored and evaluated for continuous improvement.

As a part of the national inventory, state contacts were asked to rate the importance of various components of a potential national accountability and accreditation system. The research team used their responses to create an index of importance that is analogous to the average rating each item received across all respondents. Figure 1 illustrates the findings. All of the items are centered at zero. Items that scored above zero were viewed as being of above-average importance. Items that scored below zero were rated with below-average importance. Figure 1 also illustrates the relative magnitude of the ratings. System components are listed in order from those that were perceived as most important to those perceived as least important.
Notably, state contacts see clear communication about the accountability and accreditation process, providing feedback on performance to ESAs in a timely manner, and using multiple measures of ESA effectiveness as the most important components of a national accountability or accreditation process. The inclusion of sanctions for ESAs who do not meet standards, inclusion of rewards for effective performance, and the accreditation or accountability being overseen by AESA were seen as the least important system components.

**Approaches Being Implemented Nationally**

Ideas for how a national accountability or accreditation system could be structured can be found in the various approaches to ESA accountability and accreditation being implemented around the country. Findings from the inventory and case study suggest that while several states are beginning to address the issue of ESA accountability and accreditation, states vary significantly in the maturity and structure of these efforts. Of the 42 states that completed the national inventory, contacts from 13 states (Arkansas, Georgia, Iowa, Massachusetts, Michigan, North Dakota, Nebraska, New Jersey, New York, Oregon, South Dakota, Texas, and Washington) reported that they currently have implemented or plan to implement an ESA accountability or accreditation system. Additional state contacts reported gathering data to evaluate the quality and impact of ESA services provided in their state.
There is significant diversity in how states structure their ESA accountability or accreditation systems. In some states, all ESAs are subject to the accreditation or accountability system. In Iowa, for example, every area education agency (AEA) must be accredited. Similarly, in Texas, educational service center (ESC) performance is evaluated annually by the commissioner of education. In other states, participation in the accountability or accreditation system is voluntary. For example, Michigan is in the process of implementing a voluntary accreditation system. While the goal is for all of Michigan’s ESAs to eventually receive accreditation, participation in the system will remain voluntary. Notably, when ESA accountability or accreditation systems are created through legislative action, as was the case in both Iowa and Texas, they are more likely to mandate participation.

Similarly, state departments of education play varying roles in ESA accountability and accreditation systems. In some states, the accountability or accreditation system is driven by the state, as is the case in Iowa and Texas; however, in many states, the state is not involved in ESA accreditation or accountability. Of the 33 state contacts who provided information about their state’s role in ESA accountability and accreditation, three reported that the state was involved in setting benchmarks for ESA accountability, two reported that the state reviews ESA compliance reports, and three reported that the state conducts performance audits.

**Implications for AESA Policy**

The research literature on best practices in accountability and accreditation identifies seven system components that should be carefully considered in the implementation of a new accountability or accreditation system: goals; performance indicators; design decisions; consequences; communication; support; and system evaluation, monitoring, and improvement. Some of these system components are particularly salient to state contacts in AESA states. Any new accreditation and accountability system should include careful consideration of each of the seven components. The remainder of this report is devoted to considering some of the issues that AESA may encounter as each of these system components is addressed.

Given the diverse approaches to ESA accountability and accreditation in AESA states, any national system of accountability and accreditation would have to take into account states’ varying need for supports from a national system. Some states have strong, clearly articulated accountability or accreditation policies in place, and others are just beginning to consider the issue of ESA accountability and accreditation. States with mature systems in place may find a national system redundant or burdensome if it does not fit with the system in place in the state. However, states that are just beginning to address this issue may find the supports a national system could prove valuable as they move forward. For example, one interview respondent from a state that has put a significant amount of effort into developing an accountability system said that although the state would be interested in learning more about a national system, she was “not sure that they would want to drop what we’re doing after this long pilot process.” A national accountability system must be flexible enough to meet the diverse needs of a variety of states.
Goals

According to the research literature on best practices in accountability and accreditation, accountability systems should be driven by focused, attainable goals that are well articulated and communicated. When an accountability system is being designed, goals should be directly linked to the overall aim and purpose of the system. Perie (2007) recommends considering the following questions when defining the accountability system’s goals:

- What are the purposes of the accountability system? Why are you implementing the system?
- What are the primary goals you are trying to accomplish with an accountability system?
- What accountability decisions will be made and with what consequences?
- In what systems are you working? What are the main legal and policy constraints and specifications?
- In broad terms, to what are the schools and students (or others) to be held accountable?

Clearly articulated goals serve as the framework around which all other pieces of the accountability system are linked. For example, performance indicators, design decisions, and the consequences applied should relate directly back to the goals (Perie, 2007). In addition, designers of accountability systems should develop an explicit theory of action that clearly explains how the system will bring about desired changes and achieve its goals (Perie, 2007).

A national accountability or accreditation system should be based on a clear theory of action about the purpose of ESAs and how the services they provide are connected to their goals. However, nationally there is significant diversity in how ESAs articulate their goals. The national inventory asked state contacts to identify the purpose(s) of ESAs in their state. Roughly 66 percent of respondents identified meeting the educational needs of school districts; 45 percent said that ESAs provide regionally based, cost-effective education programs; and 24 percent saw the role of the ESA as acting as a liaison between school districts and the state.

This diversity of ESAs around the country became even more apparent when state contacts were asked what services ESAs in their state provide. Table 2 lists the services mentioned and the number of state contacts (having completed the national inventory) who identified each type of service.
Table 2. Services Provided by ESAs Across the Country

<table>
<thead>
<tr>
<th>Type of Service Provided</th>
<th>Number of States (N = 40)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Professional development</td>
<td>32</td>
</tr>
<tr>
<td>Technical support</td>
<td>24</td>
</tr>
<tr>
<td>Special education</td>
<td>18</td>
</tr>
<tr>
<td>Instructional support, particularly around curriculum</td>
<td>12</td>
</tr>
<tr>
<td>Purchasing</td>
<td>12</td>
</tr>
<tr>
<td>General educational programming</td>
<td>10</td>
</tr>
<tr>
<td>Human resources</td>
<td>9</td>
</tr>
<tr>
<td>Early-childhood education</td>
<td>9</td>
</tr>
<tr>
<td>Gifted and talented education</td>
<td>8</td>
</tr>
<tr>
<td>School improvement</td>
<td>7</td>
</tr>
<tr>
<td>Grant management</td>
<td>7</td>
</tr>
<tr>
<td>Media centers and libraries</td>
<td>7</td>
</tr>
<tr>
<td>Data management</td>
<td>6</td>
</tr>
<tr>
<td>Research</td>
<td>6</td>
</tr>
<tr>
<td>Insurance</td>
<td>6</td>
</tr>
<tr>
<td>Alternative education</td>
<td>6</td>
</tr>
<tr>
<td>Assessment support</td>
<td>5</td>
</tr>
<tr>
<td>Collaborative partnerships with communities</td>
<td>5</td>
</tr>
<tr>
<td>Transportation</td>
<td>4</td>
</tr>
<tr>
<td>Administrative support</td>
<td>4</td>
</tr>
</tbody>
</table>

This diversity of services has been a strength of ESAs, allowing them to individually target the needs of the school districts in their region. However, such diversity complicates the creation of a national accountability or accreditation system. If all ESAs nationally are to be held accountable for meeting the same goals, there must be agreement that these are the right goals.

Even within some of the case study states, the issue of ESA diversity arose. In Iowa, one of the primary incentives for implementing an accreditation system for area education agencies (AEAs) was increasing the consistency of services provided to ensure equal access to high-quality services across the state.

ESA autonomy was also a value that system designers in many of the states sought to protect. In Georgia, for example, the standards for regional educational service agency (RESA) performance were designed to promote both consistency and autonomy by setting goals for performance but not dictating how RESAs meet these goals. Similarly, in Iowa, the accreditation process has no performance metrics tied to how AEAs demonstrate that they are meeting state standards. AEAs have autonomy regarding how they track usage and student achievement data, as well as how they report it. In this way, local AEAs have some control over how they define their own performance goals.
Implications for AESA Policy

A national accountability or accreditation system should be based on clearly articulated goals. Given the diversity of ESA goals and services nationally, it is imperative that AESA work closely with stakeholders to identify system goals. By working collaboratively to identify system goals, AESA will help ensure that the system has stakeholder support and that the system is aligned with a coherent theory of action about ESA operations.

A significant challenge for a national accountability or accreditation system will be to balance ESA autonomy with a desire for consistency in the services provided. States that have implemented successful accountability and accreditation systems may provide good examples of how this could be done effectively.
Case Study
Iowa’s Accreditation of Area Education Agencies

In Iowa, 10 area education agencies (AEAs) offer services to school districts on a regional basis. These are services that the local districts could not provide on their own because of size or budget limitations. The three areas of service are as follows:

- Special Education Support: vision and hearing screenings, school psychologists, social workers, speech and language pathologists
- Media and Educational Services: initially providing books and films to schools; now video and video streaming and lending libraries
- Educational Services: staff development and assisting schools

Introducing and Implementing an Accreditation System

The legislation to accredit AEAs passed in 1996, and during the next year, the Iowa Department of Education developed an accreditation system that was put in place on July 1, 1997. The state opted to accredit AEAs for two primary reasons: (1) to ensure that all AEAs were providing a consistent quality of services to districts and schools and (2) to demonstrate to policymakers and stakeholders that AEAs were an integral part of the K–12 system.

Because AEAs in Iowa are state funded, the accreditation goals are tied to ensuring favorable public perception by making certain that all constituents receive high-quality service regardless of which AEA they use. The goals for each AEA are driven by the following eight accreditation standard areas:

- School/Community Planning
- Professional Development
- Curriculum, Instruction, and Assessment
- Diverse Learning Needs
- Media
- School Technology
- Multicultural Gender Fair
- Leadership

Each standard area is evaluated on the basis of the following 11 criteria:

- AEA services respond to the needs of schools and school districts.
- AEA services are data based.
- AEA services are research driven.
- AEA services demonstrate proactive leadership.
- AEA services are supported by aligned agency resources.
• AEA services are equally available.
• AEA services align with agencywide goals.
• Action plans include evidence of meeting all standards for services.
• AEA services include a process to monitor the implementation of the service.
• AEA services include a system of measuring the effectiveness of services provided.
• AEA services include a system for measuring the efficiency of services provided.

Every five years, AEAs undergo an accreditation review that includes a seven-day site visit from a joint team that comprises staff from the state department of education, administrators and teachers from local schools, and staff from an AEA that will go through the process the following year. In addition to the site visit, AEAs submit student achievement data, the results of their annual statewide Customer Service Survey, and the Site Visit Self-Study. After the site visit is completed and all data are submitted, the state department of education receives a report that is then presented to the Iowa State Board of Education with a recommendation regarding the future accreditation status.

Primarily, the accreditation team looks for evidence that the AEA is meeting the 11 criteria in the eight standard areas. The accreditation process has no performance metrics tied to standard areas or the 11 criteria embedded within the standard areas. As such, AEAs have autonomy regarding how they track usage and student achievement data, as well as report it. For example, one AEA uses a comprehensive improvement system that houses information on programs and services provided. Another submits its District Service Plan.

If the AEA meets the accreditation criteria, the AEA is accredited for another five years; if not, the AEA receives partial accreditation along with support from the state department of education to make the necessary improvements within a given time frame. The accreditation report is publicly available through the state department of education, and some AEAs post the report on their website.

**Stakeholders’ Assessment of the Accreditation System**

In all, participants interviewed indicated that the accreditation system in Iowa works well. As a result, accreditation provides a good “public relations tool” for the legislature and the general public. In addition, AEAs do not feel as much pressure to fight for state funding by having to demonstrate, on their own, that they provide high-quality services. The annual data and five-year reports also serve to foster continuous improvement in each AEA and across the system. The public nature of the reports itself provides some measure of accountability to client districts as well as to the state.

Only two drawbacks were mentioned: the time involved to go through accreditation and the merger of AEAs that, because of their small size, could not provide the same services as other larger entities.
Performance Indicators

The literature review indicated that performance indicators should be directly tied to the goals; incorporate data from multiple sources; and include data elements that allow for interpretations of student, institution, and administrative performance (Baker, Linn, Herman, & Koretz, 2002). Performance indicators are the means by which the quality of the accountability system is measured and, as such, valid data need to be collected from multiple sources.

State contacts who completed the national inventory also identified strong performance indicators as an important component of a national accountability or accreditation system. They rated the use of multiple measures of performance and the inclusion of outcome measures as above average in importance. As Table 3 shows, 81 percent of inventory respondents reported that using multiple measures of ESA effectiveness is a very important component of a national system. Of the 15 system components that respondents were asked about, using multiple measures ranked third in importance overall. The inclusion of outcome measures ranked sixth overall, with 78 percent of respondents identifying this system component as very important. Inclusion of financial measures ranked 10th overall, with roughly half of respondents viewing this component as very important.

Table 3. State Contact Perceptions About Performance Indicators

<table>
<thead>
<tr>
<th></th>
<th>Not Important</th>
<th>Minimally Important</th>
<th>Moderately Important</th>
<th>Very Important</th>
</tr>
</thead>
<tbody>
<tr>
<td>Using multiple measures of ESA</td>
<td>0.0%</td>
<td>3.1%</td>
<td>15.6%</td>
<td>81.3%</td>
</tr>
<tr>
<td>effectiveness ($N = 32$)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inclusion of outcome measures</td>
<td>0.0%</td>
<td>6.3%</td>
<td>15.6%</td>
<td>78.1%</td>
</tr>
<tr>
<td>(i.e., measuring the impact of ESA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>services) ($N = 32$)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inclusion of financial measures</td>
<td>0.0%</td>
<td>9.7%</td>
<td>38.7%</td>
<td>51.6%</td>
</tr>
<tr>
<td>($N = 30$)</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Inventory results suggest that states vary in the type of data collected to evaluate ESA performance. ESA performance is evaluated by looking at a variety of both process and outcome indicators, including service usage, feedback from clients, financial data, and reviews of strategic or annual plans. Table 4 lists types of data collected to evaluate ESA performance and the number of state contacts who reported that each type of data is collected.
Table 4. Data Collected on ESA Performance

<table>
<thead>
<tr>
<th>Type of Service Provided</th>
<th>Number of States (N = 30)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Feedback from clients (e.g., client surveys)</td>
<td>18</td>
</tr>
<tr>
<td>Programming data (e.g., amount and types of services offered, program plans, program compliance data)</td>
<td>13</td>
</tr>
<tr>
<td>Usage data (e.g., teachers, administrators, and students served)</td>
<td>11</td>
</tr>
<tr>
<td>Organizational operations data (e.g., financial data, efficiencies created, annual report, staff employed)</td>
<td>11</td>
</tr>
<tr>
<td>Student outcomes (e.g., student achievement data, inclusion rates, graduation rates, school report cards)</td>
<td>5</td>
</tr>
</tbody>
</table>

Among the case study states, there is also significant variation in the type of data collected. In Iowa and Georgia, the state sets clear standards for performance, but individual ESAs have some flexibility in determining what data will be provided to show that they are meeting the standards. The voluntary accreditation system being implemented in Michigan, for example, identified several indicators for each standard that ESAs must compile during a self-assessment phase in the accreditation process. These indicators include project descriptions, evaluation reports, district goals, meeting summaries, student achievement data, and school improvement plans. In Texas, there is a strong focus on student performance, with both student assessment data and graduation rates playing a role in the accountability process. New York collects a variety of specific indicators that are compiled in publicly available ESA report cards. These performance indicators include the following:

- Financial information on each of the programs operated by the Boards of Cooperative Educational Services (BOCES)
- Cohort success rates for participants in adult education programs
- High school graduation rates for students who participate in career and vocational education programs
- Employment data on recent graduates of career and technical education programs
- Special education enrollment and tuition data
- State test results for students enrolled in BOCES programs
- Participation in BOCES professional development offerings (New York State Education Department, 2008)

Very few responses in the case study or the inventory reported that states have set benchmarks for ESA performance. Of the 30 states that responded to a question about benchmarks, only six reported that ESA performance is measured against established benchmarks. In the other states, data are collected on ESA performance, but these states have not set a threshold for acceptable performance on these indicators.
**Implications for AESA Policy**

A national accountability or accreditation system should collect data from multiple sources to evaluate ESA effectiveness. The data collected should be aligned with system goals.

A variety of data is currently collected to evaluate ESA effectiveness. A national system should incorporate many of these existing sources of performance data. The data collected should focus on not only the types of services that ESAs provide (process data) but also on the effectiveness of the services (outcome data).

Few states have set benchmarks for ESA performance. This may reflect the diversity of ESAs even within the same state and a belief that it would be difficult to set benchmarks for performance consistent with the context of each ESA. If AESA decides to incorporate performance benchmarks in a national accountability and accreditation system, further attention should be paid to the states in which benchmarks are currently being used (i.e., California, Iowa, Rhode Island, South Dakota, and Wisconsin) to determine how benchmarks were set and how effective they have been.
Case Study
Georgia’s RESA Accountability System

There are 16 regional educational service agencies (RESAs) in the state of Georgia. The purpose of these agencies is to support the schools and school systems by doing the following:

- Providing professional learning to improve the work of educators
- Providing data-driven school improvement that supports student achievement
- Determining shared regional services that increase the effectiveness of school systems
- Collaborating with other RESAs to maximize the impact of statewide initiatives

The original goal of the RESAs set by the Georgia Department of Education (GaDOE) was to provide school systems with expertise and assistance that they could not otherwise afford. With the passage of the NCLB legislation, however, the focus is now on improving student achievement and building the capacity of teachers and leaders.

Each RESA is governed by its own board of control, which consists of the superintendents from the member school districts, presidents of local colleges and universities, and representatives of the regional library systems. The state Steering Committee provides oversight to ensure quality, consistency, and accountability. The committee is made up of a rotating membership of current RESA directors, past directors, and GaDOE staff. The committee also works in conjunction with the RESA Directors Association, which consists of all 16 current directors.

Implementing an Accountability System

Under the auspices of the Steering Committee, Georgia is in the process of implementing its state accountability system for RESAs. It has completed the pilot stage and is transitioning four RESAs into the system each year. The goal of the system is to ensure that a consistent set of standards is applied to all RESAs and to hold the agencies accountable.

The accountability system, developed by the state Steering Committee, evaluates RESAs on three main categories of agency work: school improvement, RESA services, and purchase services. Within school improvement, the main focus of agency work, the evaluation system looks at the following:

- Professional learning to improve the work of educators
- Assistance with analysis and planning of schools and school systems
- Quality assurance driven by student and school data

Within each area, rubrics are used to guide, but not dictate, the work of RESAs. The rubrics are scored by an on-site team that comes to each RESA every four years. In
the off years, the agencies perform self-evaluations using the same system. Based on the data compiled by the RESA, the Steering Committee rates each item as “not addressed,” “emergent,” “operational,” or “fully operational,” depending on the type of data the agency uses and how many years it has tracked those data.

Currently, the system does not provide rewards or sanctions for RESAs. However, some directors feel that it should do so to hold the agencies accountable for improving in areas that have remained weak over time. Others feel that any type of ranking system would create unhealthy competition between the RESAs and would decrease some of the positive communication and collaboration between agencies. The accountability system continues to evolve, and proposals for changes made by the Steering Committee must be approved by the RESA Directors Association.

Reactions to the New System

Georgia built its accountability system from the ground up. No template existed to help its designers know what characteristics it should evaluate and what measures should be collected. This required a lot of up-front work, but respondents also noted that it fostered stakeholder buy-in. Although interview respondents identified some areas for improvement, they generally reported that the system has provided significant value to RESAs statewide. The directors in Georgia all felt that having a consistent set of standards is vital to progress and success.

RESA directors reported that the accountability system is a way to showcase the work they are doing and share ideas with other agencies. The purpose of the standards is to prescribe what the RESAs must generally accomplish, but not dictate day-to-day operations. This allows for consistency as well as autonomy.

In general, the RESA directors reported that they favor the accountability system. It has provided better and more consistent communication among the directors. They now share a common way to talk about their experiences, successes, and challenges. Each RESA has developed its own website, which also has facilitated communication. The directors can identify other agencies with similar demographics and services provided, to use each other as resources. The other RESAs and the Georgia Department of Education staff are very strong supports for the agencies. The directors also reported that the accountability system has encouraged the RESAs to “step up” and take the quality of their work to the next level.

The 16 RESAs vary significantly in the number of schools and school systems served, number of students, geographic area, local funding, services provided, as well as other factors. This diversity provides a challenge for a statewide accountability system, and the standards may not give a clear picture of the breadth of services provided by particular agencies.

There is also a concern among directors that the accountability system has been very labor intensive, which takes time away from providing services to schools. Preparing for the on-site evaluation every four years and performing the self-evaluations every year are significant time and resource investments. As with any accountability system, there is also concern that the programmatic foci of the agencies will shift toward services that are measurable, ignoring other important but less easily measurable RESA goals.
Rewards and Sanctions

The literature review suggests that accountability systems may need to involve both rewards and sanctions to motivate participants. Accountability systems should begin with broad, diffuse stakes and move toward specific consequences for individuals and institutions as the system aligns. In addition, the stakes for results and their phase-in schedule should be made explicit at the outset of implementation (Baker et al., 2002) and should be based on defensible, empirically based theories about what is possible to measure within a given period of time (Elmore, 2004).

However, state contacts rated inclusion of rewards for effective performance and sanctions for ESAs who do not meet standards as the two least important components of a national accountability or accreditation system. As displayed in Table 5, over half of state contacts viewed the inclusion of rewards for effective performance as not important or minimally important, and over two thirds of state contacts saw the inclusion of sanctions for ESAs who do not meet standards as not important or minimally important.

Very few state contacts reported that their states explicitly tie ESA performance to rewards or sanctions. However, several state contacts noted that ESA performance can affect the availability of state funding.

The case study states vary in the extent to which their accountability and accreditation system are explicitly tied to sanctions. Texas has the strictest sanctions tied to its accountability system. Service centers that do not meet state standards are put into corrective action. As such, they can be required to send a notice to each school district served describing their area(s) of deficiencies; appoint a master to oversee the operations of the center; replace the executive directors and/or board members; or in extreme but rare cases, close the service center. Interview respondents in Texas noted the focus on sanctions to the exclusion of rewards as a limitation of their state’s accountability system.

In Iowa, AEAs that do not meet standards receive partial accreditation and must work with the state department of education to improve services. Similarly, in Michigan, ESAs that do not receive accreditation are given one year to make improvements and address the shortcomings identified through the accreditation process. In Georgia, RESAs are categorized as “not addressed,” “emergent,” “operational,” or “fully operational” on each of the state’s standards. However, no explicit sanctions or rewards are tied to these categorizations. In New York, ESA
report cards are publicly available on the state department of education website, but no explicit sanctions or rewards are tied to the measure included in the report cards.

None of the case study states explicitly tie rewards to effective ESA performance as a part of their accountability or accreditation system. However, interview respondents noted that the publicity that accompanies going through an accreditation or accountability process helps ESAs publicize the good work they are doing. Some interview respondents attributed increased state funding or maintenance of funding to this positive publicity.

**Implications for AESA Policy**

AESA should carefully consider whether to include sanctions or rewards in a national accountability or accreditation system. State contacts do not rate rewards and sanctions as very important components of a national accountability system. However, the research literature suggests that linking consequences to performance can increase motivation. In considering what consequences should be included in a national system, AESA should consider the role publicity plays as both a sanction and a reward. Case study interviews suggest that the public nature of accountability and accreditation is an important incentive impacting ESA behavior.
Case Study
BOCES Accountability in New York

Thirty-seven Boards of Cooperative Educational Services (BOCES) operate in New York, serving all but nine of the state’s 712 school districts. The mission of BOCES is “preparing diverse populations for roles in the global economy, providing cost-effective shared services to school districts, and initiating collaboration to close gaps in student achievement” (BOCES, 2009). To deliver on this mission, BOCES provide direct instruction to a variety of audiences, including professional development for educators, career and technical instruction for high school students, services for students with disabilities, and adult literacy and employment training. In addition, BOCES help local districts contain costs by providing management services, regional information centers, and state networks.

Each BOCES is led by a district superintendent who is selected by the local board and approved by the New York commissioner of education. BOCES are accountable to the local board, the districts they serve, and the state department of education.

System of Accountability

The accountability system for BOCES in New York consists of three main components: market-based accountability for services, annual submission of performance indicators to the state, and an annual review of the district superintendent by the commissioner of education. Each of these components is described briefly.

Market Accountability. Each BOCES must be able to sustain itself financially by providing services that are valued by the districts it serves. BOCES operate largely on a fee-for-service basis. As a result, the demand for these services provides an important check on whether they are high quality and relevant to the needs of the district. As one BOCES official put it:

“If we are not effective as a BOCES, we don’t sell our services and we don’t sell our programs. So that is the ultimate sanction. While we are a political subdivision of the state, we really operate as a business at the regional level. So the ultimate sanction is if people stop buying your services and programs. I don’t know if the state could do anything that would be as powerful as that, frankly.”

Reporting to the State. Each BOCES must prepare an annual report card and submit it to the commissioner of education. Each report card contains data on a variety of performance indicators, as follows:

- Financial information on each of the programs operated by the BOCES
- Cohort success rates for participants in adult education programs
- High school graduation rates for students who participate in career and vocational education programs
• Employment data on recent graduates of career and technical education programs
• Special education enrollment and tuition data
• State test results for students enrolled in BOCES programs
• Participation in BOCES professional development offerings

The state does not set specific standards or benchmarks that BOCES should meet for any of these performance indicators. BOCES are required to widely disseminate the report, including providing the information to local newspapers, appending it to any proposed administrative budget, and further disseminating the report as the commissioner of education directs. In addition, the report card for each BOCES is available on the state department of education website. However, one BOCES administrator questioned how meaningful the data is to the general public.

Oversight of the District Superintendent. The performance of the district superintendent is reviewed annually by the state commissioner of education. Each district superintendent meets with the commissioner to discuss BOCES performance in the past year as well as expectations for the coming year. In advance of this meeting, the district superintendent must submit performance data to the commissioner for review. The commissioner must in turn submit an Annual 602 Report to the governor, the president pro tem of the Senate, and the speaker of the Assembly. The report contains financial and statistical data on BOCES performance statewide, including tuition costs for selected programs, per-pupil cost information, and aggregate expenditure data for BOCES administrative capital and service functions.

Areas for Growth

While the accountability system collects a large array of data on a variety of BOCES performance indicators, some BOCES administrators would like to see the system expanded to be more comprehensive and have a greater focus on objective evaluation. One BOCES administrator specifically noted that the performance indicators collected in the annual report card are often driven by specific state and federal requirements associated with funding streams for individual programs. Rather than this piecemeal approach to accountability, this individual would like to see a system designed around indicators directly connected to the central mission of BOCES. This administrator sees a national accountability or accreditation system as possibly providing direction in this area.
Communication

Research on best practices in accountability and accreditation suggests that communication within accountability systems needs to be a multifaceted process. Communication involves not only reporting results to the public but also disseminating the goals, the mechanisms through which change will be implemented, the methods through which change will be monitored and evaluated, and the consequences for meeting or not meeting goals (Perie, 2007). Clear communication is essential to establishing and maintaining a strong accountability system. For example, WestEd and Public Impact (2007) found that the most successful charter school authorizing agencies employ oversight processes in which all stakeholders are informed about how and why decisions are made.

State contacts agree that clear communication is essential. Clear communication about the accountability or accreditation process ranked first in importance among all of the 15 system components listed on the national inventory. Table 6 shows that over 90 percent of state contacts reported that communication about the accountability or accreditation process was very important, and none of the respondents said it was not important.

Table 6. State Contact Perceptions About Communication

<table>
<thead>
<tr>
<th>Clear communication about the accountability or accreditation process (N = 31)</th>
<th>Not Important</th>
<th>Minimally Important</th>
<th>Moderately Important</th>
<th>Very Important</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.0%</td>
<td>3.2%</td>
<td>6.5%</td>
<td>90.3%</td>
<td></td>
</tr>
</tbody>
</table>

According to inventory respondents, state departments of education and ESA associations take the lead in communicating to system stakeholders about state accountability and accreditation processes.

Stakeholder interviews in case study states illustrate the importance of communication in various phases of the accountability or accreditation process as well. For example, in Michigan, one of the enduring goals of the Michigan Association of Intermediate School Administrators (MAISA) is to keep the communication about the accreditation process ongoing, public, and transparent. MAISA communicates the value of accreditation to all ESAs and their districts through direct communication to the CEOs and superintendents, for example, or during its major conferences. The pilot ESAs (see Case Study, p. 33) said they notify their staff of participation in the accreditation process and then communicate with all their local school districts to secure their help with the collection of data. They also notify newspapers before the process begins, again after the accrediting agency accepts their application, and then again when they got accredited.

In New York, one interview respondent mentioned wanting to see more clear communication with the public about what the BOCES report card means. This individual expressed concern that without a benchmark to evaluate performance, the indicators included in the report card may be difficult for individuals outside of a BOCES to interpret.
In Georgia, interview respondents reported that the accountability system has actually facilitated communication among RESAs across the state. This has been supplemented by a website that allows RESAs to share ideas about how they are meeting state standards.

**Implications for AESA Policy**

Clear communication is an essential part of any accreditation or accountability system. Successful systems require clear communication about goals ESAs will be asked to meet, how their performance will be evaluated, and what supports exist to help ESAs continually improve performance. In addition, transparency about ESA performance is central to any accountability or accreditation system. Clear and easily interpretable information about ESA performance that is accessible to stakeholders undergirds many of the successful accountability and accreditation systems in case study states. Such information allows ESAs to tout their accomplishments and motivates them to continue to improve.

No matter what the structure of a national accountability or accreditation system, given its strong relationships with stakeholders nationally, AESA will play a central role in ensuring the quality of communication surrounding the system. This will be true both when the system is being designed and implemented as well as after the system is in operation.
Case Study
Educational Service Center Accountability in Texas

The state of Texas operates some of the oldest ESAs in the nation. The state’s 20 educational service centers (ESCs) have been in existence since 1968. Most ESCs in the state of Texas are considered to be an extension of the Texas Department of Education, and a subset are also classified as local education agencies (LEAs). Each educational service center is headed by an executive director who reports directly to the commissioner of education, who is appointed by the governor.

To help ensure accountability to the agency’s clients (i.e., school districts and charter schools) and to the commissioner of education, each ESC is required to establish an eight-member board or council that is responsible for providing oversight of its respective service agency. Members of the board include seven individuals elected by school districts within a given center’s region as well as a representative from a charter school in the region appointed by the commissioner. According to the Texas Education Code, the seven elected members are given voting authority, and the remaining member has no authority to vote. Thus, all 20 ESCs are overseen and report to their respective boards as well as to the state commissioner of education.

Holding ESCs Accountable for Performance

All ESCs in the state are required to go through an accountability process that is used to determine the overall effectiveness of each ESC. All service centers are heavily regulated by the state through legislation passed through the Texas Education Code, which was amended in 1995. The legislation dictates when each ESC should be evaluated, as well as how all agencies should be held accountable to their stakeholders.

The legislature mandates that every ESC must strive toward the following three main goals:

- Assist school districts in improving student performance in each of the 20 regions of the state
- Enable school districts to operate more efficiently and economically through technical assistance support (i.e., shared services, cooperatives, curriculum support, business services, and teacher recruitment)
- Implement initiatives assigned by the Texas Legislature or the Texas commissioner of education

To ensure that ESCs are held accountable for the quality and effectiveness of the services provided, and that recipients of their services are satisfied, the Texas legislature requires each service center and executive director to be evaluated annually by the commissioner. As part of their assessment, all ESCs and their directors are obligated to participate the following four-part evaluation process:

- A financial audit
- A review of the agency’s performance on a variety of indicators such as student performance
- An online statewide client satisfaction survey administered and analyzed by the University of Texas
- A review of any other factors deemed appropriate—such as increasing parental involvement throughout the state—by the commissioner of education

If a service agency fails any component of the annual evaluation, it is subjected to the possibility of restructuring or closure at the discretion of the state commissioner.

Currently, the state has not set performance standards for ESCs; therefore, each ESC is encouraged to work closely with its respective school district superintendents to determine and identify the indicators of performance it must meet. In general, each ESC must meet the three goals mentioned (i.e., assisting with increases in student achievement, improving the effectiveness and efficiency of school districts, and addressing other issues deemed important by the commissioner). However, in order to meet the unique needs of its clients, each service center is permitted to come up with its own goals and strategic plans for how to accomplish each objective. During an ESC’s annual evaluation with the commissioner, it is required to submit aggregated and disaggregated data to show how well it met its stated goals. In addition, most service centers in the state collect data via the various statewide testing exams (e.g., Texas Assessment of Knowledge and Skills) or other venues to help show improvement on indicators such as student performance or graduation rates.

In addition to the annual evaluation of ESC performance, the state legislature authorized the complete assessment of the need and efficiency of education service agencies throughout the state in 2003. MGT of America, Inc., an independent management research and consulting firm, was hired to conduct the evaluation. In the same year, the Senate Education Committee also requested the evaluation of ESCs to determine if they should be “sunsetted” or dissolved. To clarify, Sunset is defined as “the regular assessment of the continuing need for a state agency to exist. … This creates a unique opportunity for the Legislature to look closely at each agency and make fundamental changes to an agency’s mission or operations if needed” (Sunset Advisory Commission, n.d.). This separate yet similar review was headed by the Texas Sunset Advisory Commission and lasted approximately one year. As part of their dual evaluations, all service centers were asked to submit documents detailing planning and organization information and shared service arrangements, and interviews were conducted with ESC members and clients. Results of both independent evaluations revealed that there is a real need for ESCs and the various services they provide (e.g., professional development, technology services, business services). It is believed that ESCs may not have to go through another Sunset review until 2013.

**Reactions to the Texas Accountability System**

Interview respondents reported that the establishment of an ESC accountability system has helped service centers remain focused on their core objectives. It has...
allowed them to concentrate on what needs to be done to help school districts with their performance issues and their ability to operate effectively and efficiently. In addition, with these initiatives being mandated by the state and with recent state budget cuts, the capacity to achieve these goals has pushed many ESCs to be creative and to think outside the box in terms of how to meet their clients’ needs.

Interview respondents also noted that the supports provided to ESCs as they try to meet their goals are a strength of the accountability system. Although not mandated by law, the state of Texas allows each ESC to create a variety of support groups that can provide assistance in achieving the three main state-mandated goals. For example, several ESCs have a superintendent study group, a technology advisory group, curriculum council, special education council, and/or a regional advisory counsel of superintendents who represent school districts served by a particular service center. Each advisory group helps to keep its respective service center informed of the needs of its constituents. As a result, most stakeholders are cognizant of who the service centers are and the types of services they deliver. Moreover, most school districts continue to play an active role in assessing the quality of their services (i.e., an annual client satisfaction survey with an average response rate of 65 percent).

Interview respondents noted that no concrete rewards are associated with the ESC accountability process. The most notable rewards include staying open and receiving public recognition for their services. In contrast, the most frequent consequences or sanctions connected to the failed evaluation of an ECS are the threat of corrective action; the requirement that each failing service center send a notice to each school district served describing its area(s) of deficiencies; the appointment a master to oversee the operations of the center; the replacement of the executive directors and/or board members; or, in extreme but rare cases, closure of the service center.
Support

The research on accountability and accreditation best practices suggests that state, district, and school agents need to provide the necessary support to develop the accountability plan and resources that ensure that goals can be met. Strong accountability systems not only identify institutional shortcomings but also provide support for improvement. Types of support include needs assessment and planning, data analysis, capacity building, resource allocation, and progress monitoring (American Institutes for Research, 2006).

State contacts who completed the national inventory agree that support is an important component of an accreditation or accountability system. As Table 7 indicates, 70 percent of respondents rated providing support for ESAs who do not meet standards as very important.

<table>
<thead>
<tr>
<th>Providing support for ESAs who do not meet standards (N = 30)</th>
<th>Not Important</th>
<th>Minimally Important</th>
<th>Moderately Important</th>
<th>Very Important</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3%</td>
<td>6.7%</td>
<td>20.0%</td>
<td>70.0%</td>
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However, very few state contacts report having support systems in place as a part of their ESA accountability or accreditation. Of the 29 state contacts who answered an inventory question regarding the support mechanisms in place in their state, four reported that support is available through the state’s ESA umbrella organization, three receive support from the state departments of education, and one relies on other support personnel. The remaining 21 states reported that no formal support system exists in their states.

In the case study states, the level of support available to ESAs who do not meet state standards varies. In Iowa, AEAs that receive partial accreditation receive assistance from the state for improvement. Similarly, in Georgia, interview respondents reported that both the state and other RESAs serve as important support for RESA improvement. This support system has been strengthened through the communication embedded in the state’s accountability system, which has supported sharing ideas to improve performance.

In Michigan, the lack of support was noted by interview respondents as a limitation of the current accreditation system. The state has no formal support system in place for the ESAs that do meet the accreditation standards. However, the interview respondents reported that, for a fee, AdvancED and the North Central Association can provide ESAs with services to help them meet the standards. Respondents in New York and Texas did not mention any formal supports in place to support ESA improvement.

Several interview respondents in case study states mentioned that providing support for ESA improvement is an area in which a national system of accountability or accreditation could play an important role. Some of these respondents reported that their states had done a lot of groundwork to implement comprehensive accountability and accreditation systems in their
states. For these states, some aspects of a national system could be redundant, but they noted that any supports a national system could provide as ESAs strive to improve would be welcome.

**Implications for AESA Policy**

A strong national accountability or accreditation system should not only encourage ESAs to continually improve but also provide supports to make this possible. At the state level, the availability of such supports varies. AESA is well positioned to provide these needed supports.
Case Study
Michigan’s Pilot Voluntary ESA Accreditation System

In Michigan, each ESA determines its overall vision and mission statements. Currently, there is no state-mandated accreditation system for Michigan’s ESAs. During the last three years, the Michigan Association of Intermediate School Administrators (MAISA) has been developing a pilot project for voluntary ESA accreditation. This work has been a collaborative with AdvancED and the Michigan North Central Association. AdvancED, established in 2006, is the parent organization of the North Central Association Commission on Accreditation and School Improvement, the Southern Association of Colleges and Schools Council on Accreditation and School Improvement, and the National Study of School Evaluation.

Michigan’s Voluntary ESA Accreditation System

In the No Child Left Behind era of accountability, one of MAISA’s organizational goals and beliefs, according to a Michigan respondent, is to ensure that ESAs reflect the same level of responsibility and accountability for the clients they serve as that of the K–12 districts. To attain this goal, MAISA followed the model of the AdvancED district accreditation process for K–12 schools, an authorized and sanctioned accreditation process that has been used for years. MAISA applied the model to Michigan’s ESAs after a long process of refinement and development.

Development and Implementation of the System

MAISA worked collaboratively with AdvancED and the Michigan North Central Association to develop the indicators and determine performance areas for ESAs. To ensure the rigor of the model, ESA representatives also were involved in the process.

In addition, MAISA worked internally to develop several documents that helped support the voluntary accreditation model design. These documents define the roles of ESAs, the Michigan Department of Education (MDE), and local education agencies. One of them, the MDE & ISD/RESA Partnership Matrix (MAISA, 2006), served as a foundation piece outlining stakeholder responsibilities. As a Michigan

1 A parallel improvement and accreditation system in Michigan is worthy of mention. This system targets schools and districts but will also impact ISD improvement plans. During the last two years, MDE worked with AdvancED (NCA CASI) to provide Michigan schools and districts with a Comprehensive Needs Assessment (CNA) process and an online tool. CNA helps schools and districts determine and assess their system of processes and actual support for student academic achievement. They use assessment data to determine their priorities, resource allocation and develop an improvement plan. This process will be implemented statewide in Spring 2009 with schools and districts and will include ISDs in the future. It is important to note that while such effort at the school level allows MDE to support school accreditation, the district and ISD components do not lead to accreditation.
respondent recalled, the development team used this document to crosswalk and coordinate the standards that were developed for the accreditation process, using a North Central Association template. Interview respondents reported that this initial commitment by MAISA resulted in an accreditation system that was customized and uniquely suited to meet the state’s needs.

The voluntary accreditation system in Michigan was first piloted in the 2007–08 school year with two ESAs. After these ESAs had completed the accreditation process, the accrediting team made minor adjustments to the process to address issues that arose. However, no major changes occurred, and the core components of the system remain the same.

MAISA is in the process of expanding the accreditation process to include additional ESAs. At present, seven ESAs have expressed an interest in going through the accreditation process. Two to four ESAs are expected to implement the system in the 2008–09 school year. MAISA’s ultimate goal is to expand the accreditation system to include all ESAs in Michigan. However, the system will remain voluntary, with no ESA required to participate.

**Components of the System**

The overall goal of the voluntary ESA accreditation system is to improve the quality of ESAs and ensure continuous service improvement. As one Michigan respondent said, the system is based on the idea that it is important to have a system that collects data and information about what ESAs do and how they do it. The system examines ESA performance from three main perspectives:

- A body of services that ESAs provide to clients
- The level of client satisfaction with the services
- The effectiveness of the services

One of the primary aims of the voluntary accreditation system is to verify and evaluate ESA services to school districts based on constituent responses. Michigan has a total of seven performance standards (with a set of criteria and indicators for each) that ESAs need to meet to be accredited. The standards are as follows:

1. Vision and purpose of the organization
2. Governance and leadership
3. Teaching and learning
4. Documenting and using results
5. Resources and support systems
6. Stakeholder communications and relationships
7. Commitment to continuous improvement

Each of these areas contains focus questions about practices and documentation to allow for an in-depth look into performance evidence.

**Accreditation Process**
To begin the accreditation process, an ESA must be a North Central Association member and demonstrate a strong willingness and commitment to participate in the accreditation process. The ESA board writes a letter to the North Central Association and AdvancED requesting to participate in the accreditation process. Upon approval, the ESA undergoes a three-step data collection process.

**ESA Self-Assessment of Readiness.** The first task of an ESA seeking accreditation is to complete an extensive assessment of readiness for accreditation and its adherence to the AdvancED quality standards. This assessment requires the ESA to compile documentation about its goals, programs, and services, including project descriptions, evaluation reports, district goals, meeting summaries, student achievement data, and school improvement plans. The ESA receives a set of questions from the accrediting agency, summarizes its strengths and needs in meeting the goals, and goes through a set of indicators for each standard to provide the accrediting agency with a standards assessment report.

**Quality Assurance Review Team Visit.** After the ESA has completed the assessment report, a team from the North Central Association conducts a three- to four-day site visit. The team includes in-state and out-of-state representatives, such as ESA leaders from Nebraska and Iowa, and nonaffiliates of the accrediting agency. (The team’s composition changes for each site visit.) The team reviews the ESA self-assessment report, examines the documentation compiled on each of the performance areas, and interviews internal and external stakeholders. The interviews include a wide range of consumer groups from ESA staff (director, governing board members, central staff) to members receiving services (school administrators, professional staff, superintendent, central leadership personnel, school-level leadership and community members, parents, community constituents). The ESA covers the costs of the quality assurance review team visit.

**Accreditation Report.** After the site visit, the quality assurance review team prepares an accreditation report for the ESA. Based on the information that the ESA provides as part of the self-assessment and the evidence that the team gathers on its own during the site visit, the report evaluates ESA effectiveness in meeting its goals. The report contains a set of commendations and recommendations for the ESA. Based on the report findings, the accrediting agency either grants the ESA accreditation or not. The ESA’s status can be full accreditation, interim accreditation, or nonaccreditation. In the cases of nonaccreditation, the ESA is required to improve in the identified areas within a year. When the ESA gets accredited, it receives public recognition.

The process continues after the ESA receives accreditation. The ESA must document and report on progress in the areas of improvement every two years to stay accredited. The ESA submits to the North Central Association a biannual progress update on the recommendations outlined in the accreditation report.
System Strengths and Areas for Improvement

Strengths

Interview respondents were generally positive about the state’s new accreditation system and mentioned a variety of its strengths.

**Voluntary Process—Not Mandated.** The Michigan Department of Education does not issue mandates regarding ESA goals, nor does it determine what ESAs should be doing. The *Partnership Matrix* document, developed collaboratively by ESAs and the department, serves as a guide rather than a mandate. ESAs determine their unique goals through their governing boards and local districts. Because of variance in ESA goals and services, MAISA’s challenge has been to establish some consistency across the state. Through the voluntary accreditation process, ESAs can establish some commonalities among services they focus on and how they evaluate their goals.

**Customized Approach for a Consistent and Continuous Process.** The North Central Association’s approach took into consideration the fact that ESAs vary greatly across the state in how they provide services and to what extent they measure their effectiveness. The accreditation process offered for districts and schools had to be customized to fit the ESAs. However, while the approach had to be customized, the form and process were consistent for each ESA going through the accreditation process. In its pilot stage, the process is open to changes and is functioning in the spirit of continuous improvement.

**Use of Outside Expertise and Credibility.** One of MAISA’s primary goals was to involve an outside expert in establishing the accreditation system for ESAs. Even though MAISA could have developed an accreditation system internally, respondents reported that involving an outside organization increased the credibility and neutrality of the system. Respondents reported that going with a national system from the accrediting agency was extremely important, rather than the state trying to design its own system. The North Central Association and AdvancED are the largest school accrediting organizations in the world and have a recognized accreditation system, including international accreditation programs. Because of their reputation and expertise, MAISA chose those organizations as its partners in developing the accrediting system for ESAs. Another strength of the accrediting agency was the fact that it had professionals with school experience doing the ESA reviews. Interview respondents reported that having ESA representatives from other states as part of the quality assurance review team is also extremely valuable.

**Increase in Self-Awareness and Public Recognition.** The ESAs going through the pilot reported that the process increased their awareness and understanding about the programs and services they provide and the perception of local school districts regarding these services. According to one Michigan respondent, the voluntary accreditation process offered the local ESA “an opportunity … to do a self-reflection about [the] organization and really focus on areas [the ESA] felt [it] needed to improve on.” ESAs understand that accreditation is a powerful tool in helping them know and be able to show that what they do makes a difference. The process is both high stakes and public—an ESA could potentially lose the trust of its community if it went through the process and was unsuccessful.
**Ongoing and Transparent Communication.** One of MAISA’s continuing goals is to keep the communication about the process ongoing, public, and transparent. MAISA conveys the value of the accreditation process to all ESAs and their districts through direct communication to the CEOs and superintendents, for example, or during its major conferences. The pilot ESAs said they notify their staff of participation in the accreditation process and then communicate with all their local school districts to secure their help with the collection of data. The ESAs also notify newspapers on several occasions: once before the process begins, then after the accrediting agency accepts their application, and finally when they receive accreditation.

**Long-Term Commitment Required.** When an ESA decides to go through the voluntary accreditation process, a high level of commitment is necessary, even to begin the process. According to one respondent, in every case, the pilot ESA team is making the decision at the direction and energy of the superintendent. The involvement is at least one-year long—to get started, collect the data, complete the self-assessment, prepare for the quality assurance review team visitation, participate in the site visit, and have the follow-up meeting.

**Areas for Improvement**

In spite of these strengths, interview respondents did identify areas in which they thought the state’s accreditation system could be strengthened.

**Formal Support for ESAs Not Available.** Currently, there is no formal support system in place for the ESAs that do not meet the accreditation standards. The respondents reported that AdvancED and the North Central Association can provide ESAs with services for a fee in order to help them meet the standards.

**Focus on Status Quo Versus Innovation.** Although the voluntary accreditation program focuses far more on quality than compliance, according to one respondent, it should de-emphasize its focus on the status quo of the ESA and focus more on pushing innovation. The respondent believes that the process tends to evaluate what the ESA is doing currently rather than asking questions about what it should be doing.

**Lack of ESA Participation.** As previously mentioned, ESA participation in the voluntary accreditation process requires financial resources. First, the ESA has to be a member of the North Central Association; second, once the process begins, the ESA covers the costs associated with the process, such as the quality assurance review team visitation expenses. As suggested by one respondent, these costs might be shared by the professional statewide organization, which could encourage more participation from the ESAs in this voluntary accreditation process.
Evaluation of the Accountability or Accreditation System

The research literature on best practices in accreditation and accountability argues that mechanisms need to be instituted to determine how the accountability system will be monitored and evaluated for continuous improvement. In addition, longitudinal studies need to be planned and implemented that will report the effects of the accountability system (Baker et al., 2002). For example, a 1999 evaluation of California’s Standards-Based Accountability System recommended that the state step back and review the current status of its system, align what already exists, and resist the temptation to move ahead with new initiatives (Guth et al., 1999). In evaluating accountability systems, specific attention also needs to be paid to unintentional consequences that implementation of the system may have.

State contacts also viewed evaluation as an important component of a national accountability or accreditation system. As shown in Table 8, roughly two thirds of inventory respondents rated continually evaluating the performance of the accountability system as very important. None of the inventory respondents viewed this as not important.

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<th>Not Important</th>
<th>Minimally Important</th>
<th>Moderately Important</th>
<th>Very Important</th>
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<tr>
<td>Continually evaluating the performance of the accountability system ($N = 31$)</td>
<td>0%</td>
<td>9.7%</td>
<td>22.6%</td>
<td>67.7%</td>
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Only four of the state contacts reported that efforts were currently in place to evaluate their states’ accountability or accreditation system. Similarly, none of the case study states noted formal evaluations of their states’ accountability or accreditation systems.

Michigan and Georgia did incorporate processes for adjusting their accountability and accreditation systems to address shortcomings. In Michigan, the accrediting team reviewed the accreditation process after piloting it with a few ESAs, and modest changes were made. In Georgia, the Steering Committee can recommend changes to the accountability system, and these changes must be approved by the RESA Directors Association before they can go into effect.

Implications for AESA Policy

Any national accreditation and accountability system needs to be regularly evaluated to assess whether stakeholders are satisfied with the system, to evaluate whether the system is having the intended effect, and to identify any unintended consequences that may have occurred during implementation. A process also should be put in place to use data from the evaluation to continually improve the accreditation or accountability system.
Summary of Findings and Recommendations

This report draws from three sources—a review of the research on best practices in accreditation and accountability, results of a national inventory of state ESA contacts, and case studies of accountability and accreditation systems in five states—to provide guidance to AESA as it contemplates implementing a voluntary national accountability or accreditation system. The following key findings emerged from the study:

- A voluntary national system could add significant value for ESAs across the country. Accountability and accreditation systems can focus ESAs on key goals and priorities, ensure that a consistent level of high-quality services is available across ESAs, and raise the visibility of the contributions ESAs make to the educational system.

- There is national support for the creation of a voluntary accreditation or accountability system among ESA state contacts.

- States vary in the extent to which they have implemented accountability or accreditation systems for ESAs and the approaches to accountability that they have adopted.

- The research literature identifies seven key components that should be carefully considered when implementing an accreditation or accountability system: goals; performance indicators; design decisions; consequences; communication; support; and system evaluation, monitoring, and improvement.

- Clear communication about the accountability and accreditation process, providing feedback on performance to ESAs in a timely manner, and using multiple measures of ESA effectiveness were identified by state contacts as the most important components of a national accountability or accreditation process.

- Nationwide, ESAs vary markedly in how they articulate their goals and core services, making the articulation of clear goals a challenge for a national accountability or accreditation system.

- Nationwide, ESAs collect a variety of data to measure ESA performance. However, few states have set clear benchmarks for expected ESA performance.

- The research literature suggests that sanctions and rewards may play an important role in motivating participants in accountability and accreditation systems. However, many state contacts do not view the inclusion of sanctions and rewards as very important components of a possible national accountability or accreditation system. The public nature of many state accountability and accreditation systems acts as both a sanction and a reward for ESA performance.

- According to the research literature, strong accountability systems incorporate support for ESAs that do not meet standards to improve performance. However, nationally, there is a need for additional support to continually improve ESA performance.

- Very few states currently have systems in place to regularly evaluate and improve their accountability or accreditation systems.
Recommendations

Based on the policy study findings, we make the following six recommendations to guide AESA’s efforts moving forward:

- AESA should move forward with designing a voluntary accountability system for continuous improvement by convening a national advisory panel of stakeholders to carefully consider and make recommendations on key system design decisions, taking into account the findings of this report.

- Given the diversity of ESA practice nationally, as well as the variety of approaches to ESA accountability and accreditation being implemented across the country, AESA should implement a voluntary accountability system for continuous improvement rather than a rigid accreditation system that sets specific standards or thresholds for the provision of specific services or categories of service.

- The panel should explicitly consider each of the seven essential components noted in the literature: goals; performance indicators; design decisions; consequences; communication; support; and system evaluation, monitoring, and improvement—specifically, as follows:
  - Accountability systems should be driven by clearly articulated goals that are focused and attainable.
  - Performance indicators in an accountability system should be directly tied to system goals, incorporated from multiple data sources, and include elements that allow for interpretation.
  - The research literature suggests that sanctions and rewards may play an important role in motivating participants in accountability systems, but, as state contacts suggest, it may not be appropriate to include explicit rewards or sanctions as a feature of a national system.
  - The public nature of many state accountability systems acts as both a sanction and a reward for ESA performance. Reports generated by public ESAs that are the result of participation in a national process should be public, and this practice contributes a level of accountability.
  - Strong accountability systems incorporate support for ESAs that do not meet standards to improve performance.
  - Accountability systems should be evaluated regularly and continually improved. Evaluations of these systems should be particularly attentive to unintended consequences.

- The national system should be voluntary and flexible. States vary considerably in the maturity of their efforts to adopt an accreditation and accountability system. The national system should be compatible with their efforts rather than undermine the work many states have already done in this area.

- As a part of the national system, AESA should play a larger role in providing supports for continuous improvement of ESAs nationally.
Specific attention should be paid to ESA diversity statewide and nationally. When identifying the goals that will drive the system, AESA should balance the desire to ensure consistent, high-quality services statewide and nationally with a strong need for ESA autonomy to meet the specific needs of each region.
References


Boards of Cooperative Educational Services. (2009). *What is a BOCES?* Retrieved January 31, 2009, from http://eboces.wnyric.org/wps/portal/BOCESofNYS/kcxml/04_Sj9SPyksy0xPLMnMz0vM0Y_QizKLD4p3cTQFSZnFB8ZbVmgR8LEgvS99X098nNT9Q0C3Ijyh0dFRUb9mdMA!!/delta/base64xml/L3dJdyEvd0ZNQUFzQUMvNEIVRS82X1JfREFB


