

An Examination of State Accreditation Practices For Education Service Agencies

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In recent years, the six states of Georgia, Nebraska, Ohio, Oregon, Texas, and Wisconsin have inaugurated an accreditation system for their statewide networks of education service agencies. This development is part of a national movement to not only create more meaningful state performance accountability systems, but also to include all actors in the state system of elementary secondary education. The article examines the intent of the six state programs, the processes they use, standards that have been developed, the extent of use of indicators of quality, and what, if any, sanctions are applied by the states for poorly performing service agencies. Rural school systems, that have historically been the prime benefactors of the programs of such agencies, have a prime interest in this new development, as should those who help shape policies designed to improve rural small schools.

INTRODUCTION

In recent decades, education service agency type organizations have been promoted in many states as one of the principal policy options for enhancing the quantity and quality of the delivery of needed programs and services in the state system of elementary secondary education. One of the traditional prime targets of these prior state initiatives has been to make accessible to rural small school districts programs and services that they might not be able to provide themselves when acting alone due to enrollment, staffing, or fiscal limitations, or to assist them to secure a higher quality of services more efficiently if the resources of a number of rural systems and/or the state could be aggregated in a service type unit. Known by a variety of titles and diverse in many of their governance, organizational, programming, and fiscal features, comprehensive statewide networks of education service agencies (the generic term used to describe these units) exist in nearly one-half of the states, according to Stephens. Moreover, the unprecedented conflux of economic, social, political, and educational developments in the 1980s recently outlined by Stephens, that promise to span well into the next decade, will clearly add to the difficulties of the large nonmetropolitan regions of the nation, and by extension, further complicate the dilemmas faced by rural schools and the state policy communities seeking ways to improve the total state system of elementary secondary education. These developments will likely cause other states to consider the creation of service type agencies in that one of the other potential major state policy choices for improving the structure of the state system, rural school district reorganization, does not appear to enjoy widespread support, both within and outside of the education policy community, and has not for some time.

Concomitant with the renewed state interest in creating more efficient and effective delivery systems are growing pressures that the states develop more meaningful and comprehensive state performance accountability systems. A recent report by the U.S. Department of Education's Office of Educational Research and Improvement, that advocates more responsive and responsible state systems, indicates that all 50 states now have in place a system for collecting performance data on how well local school districts are performing.

Most states appear to be concentrating their initial energies on the development of local districts' performance measures and have thus far generally limited efforts to broaden the scope of their work to include other key actors in the state systems of education. However, the six states of Georgia, Nebraska, Ohio, Oregon, Texas, and Wisconsin have within the past few years enacted plans calling for a new accreditation system for monitoring the workings of their education service agency network. As will be discussed below, most of these networks have, since their inception, operated under relatively comprehensive accountability measures. The implementation of a new accreditation system adds another level of sophistication to their previous accountability programs.

Objectives of This Article

The objectives of this article are five in number. The first is to establish what appears to be the initial intent of the six newly formulated state ESA accreditation programs. Next, a description will be provided of the principal processes used in the six states in the conduct of their accreditation practices. Emphasis here will be on what time frames are used, whether or not there is a requirement for a self-study or external team validation, and what, if any, sanctions are to be imposed on poorly performing

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units. The third is to establish the nature and scope of standards used with special attention here given to what emphasis, if any, is given to context, input, process, and product variables. This is followed by a discussion of whether or not the states make use of all-important indicators of quality for one or more of the standards. Finally, a number of observations about the present state-of-the-art systems for state accreditation policies and practices for ESAs are then offered. First, however, an overview of several of the major characteristics of the six networks is presented.

AN OVERVIEW OF THE SIX STATE NETWORKS OF ESAs

The six state networks included in this examination all were created in the mid-1960s, as shown in Table 1. In a majority of cases, former county offices of education were used as the building blocks for the establishment of the new units, that almost universally serve multi-county geographic regions. All six have a mission to provide those services needed and/or requested by the local school districts in the region served by the agency, as well as perform certain administrative, dissemination, or clearinghouse functions for the state education agency. However, their involvement in state-initiated activities varies substantially. While local school districts are required to hold membership in a service agency in all cases except Nebraska, participation in the programs and services of the units is generally voluntary; however, in many instances the state has put in place substantial

incentives and disincentives to encourage local systems to use the services of the interdistrict coordinating mechanisms.

While the programs and services offered by the service agencies vary substantially across all six networks as well as within individual state systems, certain commonalities are evident. A majority are extensively engaged in staff development, curriculum development, cooperative purchasing, data processing, and the provision of technical assistance to local systems. Many offer a wide range of direct instructional services for exceptional children enrolled in member local districts. While most offer services to the larger enrollment size districts in their region, rural small local systems are clearly the prime constituency of the service units in all states.

All six state networks were classified in the 1979 typology of education service agencies developed by Stephens as Type A, Special District ESAs. This typology was constructed after examining over 100 governance, organizational, staffing, programs and services, fiscal, and other features of all 31 comprehensive state systems operating in 25 states in that year. While no pure systems exist, Special District ESAs tend to exhibit the following dominant patterns: their legal framework tends to be structured in legislation and/or state education regulations (as opposed to the more general intergovernmental compact agreements found in most states); they generally are governed by lay boards (as opposed to representatives of member local districts that is true of other forms of ESAs); their programs and services tend to be determined by member districts and the state; and, their fiscal support tends to be derived from a mix of local, regional, state, or

TABLE 1
Year of Initial Establishment of Networks and Year Accreditation Practices Begin and Their Origin

State and Title of Units in Network	Year Established	Number of Units	Effect Date Accreditation Program	Legal Basis of Program
Georgia Regional Educational Service Agencies	1966	16	1990-91	SEA regulation
Nebraska Education Service Units	1965	19	1990-91	SEA regulation
Ohio County Office of Education	1914	87	1989	SEA regulation
Oregon Education Service Districts	1963	29	1977	SEA regulation
Texas Education Service Centers	1967	20	1985	SEA regulation
Wisconsin Cooperative Educational Service Agencies	1965	12	1986	SEA regulation

Key

SEA—state education agency

state/federal sources (in contrast to the near exclusive use of member local district funds for other types). In 1979, two of the six networks, those in Georgia and Nebraska, were classified in another category of the typology. These now are viewed to be Special District systems because of newer, more rigorous state monitoring of their operations as well as their deeper programming involvement in state priorities.

As shown in Table 1, the state accreditation programs governing the ESA networks in five of the six states, all except Oregon, were begun in the past five years, well after the creation of the units. It is true of course that state oversight of certain fiscal aspects of their operations (*e.g.*, requirements for annual audits, uniform financial accounting procedures) have been in place in most cases since the inception of the units, consistent with the long-standing tradition of rigorous state review of the fiscal operations of all public sector agencies.

INTENT OF CURRENT PROGRAMS

Improvement of the management and the effectiveness of programs and services, and accountability are the two dominant stated goals of a majority of the six state accreditation programs. Illustrative of these twin overriding intents are the statements of purposes of the accreditation policies in effect in Georgia and Texas. The Georgia plan establishes that:

The application of Standards will assess not only a RESA's compliance with state law and GBOE policy but also the effectiveness of programs and services and the presence of exemplary educational practice (p. iii).

The Texas statement of intent is perhaps the most comprehensive of all:

It is the intent of the State Board of Education that the elements of the Texas public school system be accountable to the people of this state for the system that they manage. Therefore, it is critical that the long-range plan and the ESA state plan provide a structure that allows the regional education service centers to continue to improve the quality of their services while providing the citizens of the state specific means by which they can judge the overall success of this element of their public school system (p. ii).

The accountability theme is also stressed in a later section of the state plan. Because of the force of the language used to express the emphasis the state has placed on the issue of accountability, this second reference is cited in its entirety:

As entities in the state educational system, regional education service centers share in the commitment to leadership, excellence, efficiency, and accountability in the education process, and in the use of public resources.

Each regional education service center shall

develop a system of planning, implementing, and evaluating that ensures prudent and legal utilization of public resources, and reporting procedures that will document the results of the system. Evaluation findings will be used to promote quality in the provision of services and economy in the use of public resources. The foregoing elements are inherent responsibilities of education service center governance and management (p. 34).

The intent of the Nebraska program is instructive for two reasons. In addition to identifying self-improvement as one of the goals of accreditation, efficient use of resources of the state is also established, and reference is made that the level of performance called for in the accreditation program is to be recognized by all as minimal, not optimal (p. i). The apparent hope is that the ESAs in that state will exceed the called-for minimal levels of expectations.

The twin goals of self-improvement and accountability are also evident in the Wisconsin program that speaks to the benefits that should accrue to CESA personnel who as a result "... may study the value and effectiveness of their programs" (p. ii), but in addition, establishes a second goal of aiding "... the state superintendent with meeting the responsibility of having to evaluate the CESAs every third year" (p. 2).

Unlike the four preceding states, the Ohio plan stresses the single goal of self-improvement and is devoid of any references to accountability: "The evaluation process should be an experience leading to improvements in the services offered by the county school districts ..." (p. 16). However, as will be shown below, the state education agency standards for the operation of the county units clearly call for a degree of accountability. The cause of this apparent ambiguity is unclear. It may in part be due to the fact that the Ohio County Superintendents Association had voluntarily developed a self-evaluation system for their use in 1979, ten years prior to formal state action. This example of good faith, that is believed to be unprecedented in the nation for education service agency type organizations, no doubt changed somewhat the chemistry surrounding the negotiations regarding the establishment of the formal state accreditation plan in 1989. Or, it may be that the emphasis placed on improving services was simply one more way to stress that this, after all, ought to be the *raison d'être* for the county office.

While the intent of the Oregon accreditation plan is not explicitly stated, it is clear from a review of the standards used in that state and the processes required for implementation of the program that the dominant twin goals of improvement and accountability also prevail here.

PROCESSES USED

Both diversity and commonalities distinguish the processes used in the six states. For purposes of this analysis, the major processes employed by the states are

organized into four principal stages that are not too unlike those used by the two principal professional education accrediting bodies: the National Council for Accreditation of Teacher Education, and the National Association of State Directors of Teacher Education and Certification. Making use here of similar categories to those used by these two national professional education accrediting bodies is not coincidental, for as will be evident, many of the norms established by the two organizations appear to have greatly influenced state practices concerning their ESA networks.

The four major stages of accreditation processes used here are:

- The self-evaluation report.
- The on-site review procedures.
- Post on-site review procedures.
- The use of results.

The patterns used in five of the six states in each of these four stages will be highlighted. Because of its unique features, the Texas approach will be considered separately.

The Self-Study Report

All five states, Georgia, Nebraska, Ohio, Oregon, and Wisconsin, require the ESA to complete a self-study report prior to an on-site visitation by an external body. The Wisconsin program further specifies that an annual consumer evaluation of programs and services be conducted and that the aggregate results of these annual assessments be part of the required multi-year review. In all five states, the frequency of the self-study is governed by the time schedule for the required on-site visitation: seven years in the case of Nebraska, five years for Ohio and Oregon, three years for Wisconsin, and “periodically” in Georgia.

In a majority of cases, all except Wisconsin, the composition of the self-study team is not specified and thus appear to remain a discretionary choice of the ESA. The Wisconsin plan requires completion of the self-study by a representative steering committee composed of ESA staff and consumers of the agencies.

The On-Site Review Procedures

On-site visitations are required in all five states, following the time schedule cited above. The Georgia plan also requires an annual visitation by a SEA representative to determine whether or not the ESA is in legal compliance with state law and state policy, one of three accreditation classifications used in that state.

Various procedures are used to staff the on-site visitation teams. In Georgia the team is chaired by a SEA representative and includes other educators and lay representatives. The composition of the teams in Nebraska and Oregon is mutually agreed upon by the SEA and the ESA and in both cases, employees of the ESA and schools served by the unit are prohibited from having membership. SEA personnel staff the Ohio on-site visitation

teams. While the chair of the Wisconsin visitations may be the ESA administrator, the teams must be representative of constituent groups and the SEA.

The size of the visitation teams is not specified in Georgia, Nebraska, or Ohio. Oregon and Wisconsin acknowledge that the number will vary according to the size of the ESA and the scope of programs and services offered.

The primary role of the visitation team is to validate the self-study report, collect additional information on the workings of the unit, as warranted, and to issue a report on the condition of the ESA.

Post On-Site Procedures

It is in this set of processes where the (relatively) greatest uniformity of accreditation practices prevail in the five states. All require that the ESA provide a written response to the visitation team report, including a timeline for necessary corrective action. Three (Georgia, Ohio, and Wisconsin) require public disclosure of the visitation report, usually within a specified time period.

Use of Results

Three of the state programs (Georgia, Ohio, and Oregon) make specific reference that the SEA will monitor the corrective action plans submitted by an ESA found to be deficient; the remaining two state plans are silent on this issue. While not always specified, the period of accreditation for ESAs satisfying the accreditation program is implied to be until the next comprehensive evaluation. In the case of Georgia, an annual review is conducted to ascertain legal compliance, as established previously. Similarly, the Nebraska accreditation period is only for one year.

Concerning the all-important issue of sanctions against poorly performing ESAs, three of the five states have in place provisions to govern this contingency. Georgia will classify an ESA as “nonstandard” if it determined in an annual SEA visitation that a unit is not in legal compliance with state law or policy. However, the state plan is silent regarding subsequent action.

The Nebraska plan requires that an ESA be placed in a “not accredited” status if it fails to annually comply with the requirements of the regulations governing its operations. Again, the consequences of being placed on this status are not specified. The Ohio plan specifies that an ESA will be designated a “charter” system when all requirements are satisfied.

The only state plan where sanctions may be levied against an agency judged to be a poorly performing unit is that of Oregon where a “sub-standard” district may, by action of the State Board of Education, be merged with a contiguous ESA. While this has never occurred, it is important to note that the Oregon service units operate under one of the most rigorous checks and balances system of any state systems. Thus it could be argued that the likelihood of a service unit performing poorly is greatly reduced.

Only one of the state's, again Oregon, has made provision for the use of waivers for compliance with a standard and has established a process for this contingency. However, it should be stressed that the intent of granting waivers is to "encourage districts to develop planned pilot or experimental services" (p. 3), not some other objective.

With respect to the converse of sanctions against poorly performing units, only one state, Georgia, recognizes units that perform in an exemplary manner.

The Special Case of Texas

The Texas plan for the accreditation of its statewide network of twenty service agencies is regarded to be so unique that it is considered separately here. There presently are eight distinct components in use:

- An annual report to the SEA of all funds received by an agency for its review and approval.
- An annual performance report to the SEA and to each local district served.
- A management and service audit once each five years conducted by the SEA that is to be disseminated widely.
- The SEA monitoring of ESA compliance with program guidelines for services fiscally supported by state funds at least once every five years.
- An annual financial audit of ESA operations by an independent auditor (a common requirement in all states).

- The development of an annual budget using a standardized accounting and reporting system (another common requirement in all states).
- A SEA evaluation of the effectiveness of an ESA using both consumer satisfaction measures and cost-effectiveness measures (no timeline for this activity is established).
- Finally, an annual review of the effectiveness of each ESA conducted by the chief state school officer using a composite of the reports cited above; the results of this review are disseminated widely.

A recapitulation of selected processes used in the six states is provided in Table 2.

STANDARDS EMPLOYED

The measurement of the quality of the operations and programs and services of a service agency of course should be at the very core of an accreditation plan. The six states have approached this issue in a variety of ways and in differing degrees of comprehensiveness. Discussed here are the patterns used by the states in developing standards and the content areas generally covered by them.

Approaches Used in the Development of Standards

Examination of the existing standards in the six states establishes that primary emphasis in all instances is given

TABLE 2
Selected Processes Used By the States

Step	Georgia	Nebraska	Ohio	Oregon	Texas	Wisconsin
1. Completion of Self-Study required frequency	yes periodically	yes 7 yr.	yes 5 yr.	yes 5 yr.	yes* 5 yr.	yes** 3 yr.
2. On-Site Review required membership selection membership chair	yes*** SEA/ESA SEA	7 yr. SEA/ESA ns	5 yr. SEA SEA	5 yr. SEA/ESA SEA	ns SEA/ESA SEA	3 yr. ESA ESA
3. Post On-Site Procedures permissible ESA rejoinder public disclosure/report required ESA response	yes yes yes	ns yes yes	yes yes yes	yes yes yes	ns yes yes	ns ns yes
4. Use of Results sanctions levied for poor performance recognition of exemplary status	yes yes	yes no	no no	yes no	no no	no no

* plus a required annual performance report

** plus a required annual consumer evaluation of services

*** plus a required annual legal compliance review by SEA

Key:

ESA—education service agency

SEA—state education agency

ns— not specified

to three general expectations about the way the networks of ESAs are to perform:

- Legal adherence to existing state law and applicable federal statutes.
- Adherence to existing state board of education and state department of education policy.
- The degree to which the agencies achieve some valued practice or judgment about what constitutes either quality, or effectiveness, or both dimensions, in the workings of an education service agency.

The priority given to legal adherence to existing state and appropriate federal laws and that assigned to compliance with existing policies of the state board or state agency is not surprising, given the public sector nature of the agencies. Moreover, this emphasis is consistent with one of the overriding intents of the state accreditation plan to make the service units accountable. The stress in the standards on some valued practice is consistent with the state desire to reflect in its standards improvement in the working of the service agencies, the second of the twin overriding initial state interests for establishing the accreditation plan.

Little use appears to be made at this early stage in the design of state standards governing ESA operations of other commonly used approaches to quality measurement for public sector organizations identified by Hatry: the use of absolutes, the use of engineering standards, and comparisons with the private sector. However, some states in the future, for example in the second generation of their accreditation programs, may be in a position to make use of other meaningful approaches to standards development discussed by Hatry. Especially promising here, once a track record is established, are the utility of comparisons over time, and use of analysis to establish what the standards of an effective ESA should be. Another widely used approach in the public sector, the comparison of one ESA with another, will likely be complicated given the state intent that the accreditation exercise be a formative, not summative, assessment.

Content Areas Included in the Standards

While the approaches used in the six states to establish standards are relatively uniform, diversity marks the scope of standards addressed by the states as well as the way the states have internally organized their standards. In describing the prevailing patterns, use will be made of a fairly conventional perspective that an ESA, like other educational enterprises, consists of a number of basic, near-universal organizational-structural characteristics, and that these organizations, like others, make use of a number of processes through which the work of the organization is accomplished.

One conceptual perspective of common organizational-structural characteristics holds that a typical educational organization has the following subsystems: governance, management, instructional program, instructional support services, client, staffing, financial, and facilities and equipment. A conventional perspective of the major

processes used in organizations to carry out the desired functions in each of the eight subsystems holds that most decision making is one of four types: planning decisions, organizing decisions, directing decisions, and controlling or evaluation decisions. Understanding what conceptual plan is used by an organization and how the organization has structured itself to achieve its goals is an essential prerequisite for an analysis of the effectiveness of the organization.

Although differences exist in the depth of coverage, a majority of the state accreditation programs have in place standards governing the following content areas:

- The governance subsystem of the units, especially compliance with state legal requirements, that tend to be the same as for local school districts, and the requirement that the agency have written policies.
- The management subsystem of the units, again especially with regard to compliance with state legal requirements (that also tend to be patterned after local school district practices), and the requirement that the ESA administrator hold appropriate administrative certification.
- The financial subsystem of the units, particularly compliance with state legal requirements including the need to follow uniform accounting, reporting, and auditing procedures.
- The program and service subsystem of the units, especially compliance with state legal requirements and policies of the state education agencies, and the requirement for periodic program planning as well as periodic program assessment and evaluation.
- The staffing subsystem of the agencies (again, especially compliance with legal or SEA regulations), regarding appropriate staff certification, and the requirement that the units have a set of personnel policies.

The standards of some states are very explicit in promoting practices highly valued by the framers of the programs. Several of the more (in a relative sense) interesting expressions of value judgments that relate to the organizational-structural characteristics or to the processes that the agencies should exhibit are:

- The earlier Georgia standard that required an ESA administrator to annually visit each local district in the region served.
- The Nebraska and Georgia standards that require each ESA to provide minimal professional development activities for their certified personnel.
- The Wisconsin standard that requires ESAs to conduct an annual client assessment of programs and services offered.
- The Ohio standard that addresses quality of work place considerations (“work space, professional library, access to telephones, private conference space, private restrooms, adequate parking . . .” (p. 3). The likelihood is that this standard is directed at aiding the ESAs who are in competition with other county offices for space in facilities provided by county government. Nonetheless, it places Ohio

in the forefront on an issue gaining momentum in the profession.

As suggested above, the current standards in the states vary widely in their comprehensiveness. In a relative sense, the Georgia and Texas standards are by far the most detailed. The Nebraska standards are the most limited in number, although the Nebraska state professional association of ESA administrators in the summer of 1989 began a voluntary collaborative exercise with the state education agency to broaden the scope of coverage of the standards to be used prior to the effective date of the program, the Fall of 1990.

The difference in the scope of coverage of various state programs can be explained in several ways. In many respects, the variations appear to be a reflection of the traditions operating in a state system, especially those having to do with the posture of the state education agency. For example, in states where the state has traditionally maintained a low profile in its position on the volatile issue of accreditation of local school districts, it has tended to approach the question of the accreditation of ESAs in like manner. Moreover, the two states having the most comprehensive set of ESA standards, Georgia and Texas, both in recent years engaged in what many observers regard to be two of the most far-reaching education reform packages in the nation. The ESA standards exercises in these states were no doubt caught up in these developments. Additionally, the tradition of state oversight of the Nebraska ESAs is clearly a new phenomenon in that state in that the ESAs have just recently been officially brought into the state system.

A second major explanation for differences in the scope of coverage among the six states relates to the statutory roles assigned to the networks. For example, the Oregon system has the statutory responsibility to serve as the local school district boundary board and to provide attendance supervision for member local school systems of less than 1,000 students. Consistent with the propensity of states to include standards calling for compliance with state law, the Oregon program includes standards that address these roles.

A third major explanation of differences in coverage relates to the requirements placed on the ESA networks. For example, in states where there is a requirement that the ESAs maintain an advisory committee of local district personnel to advise the service unit concerning its programs and services (not a universal strategy), then one is likely to find a number of standards that attempt to assess the use of and the role played by such groups.

THE USE OF INDICATORS

It seems clear that the states will experience growing pressure to both expand their existing accountability systems through the inclusion of new product measures, add context, input, and process measures as well as move from the existing almost exclusive focus on local school districts to include other organizations in the state system of elementary secondary education. The relative recentness

of most of the six state accreditation programs for ESAs stands as evidence of the correctness of this latter prediction. The term "state performance accountability systems" is frequently applied to describe the use of more meaningful categories of variables that should be included in new state accountability initiatives.

The centerpiece of new state performance accountability systems that will distinguish these programs from earlier state oversight efforts is the use of indicators that provide information on how well educational organizations are performing. The use of indicators of performance represent a critical added step to the use of standards, the traditional method employed to assess effectiveness. Standards alone that focus on the presence of specific organizational behavior, as valuable a prerequisite as they are for assessing effectiveness, do not necessarily provide insight on the quality of the behavior, or whether or not an organization makes use of the results of this activity. Indicators can provide this insight that is so essential for the measurement of organizational effectiveness.

The 1988 report of the U.S. Department of Education, Office of Educational Research and Improvement State Accountability Study Group offers this definition of an indicator:

Indicators, or statistics that reveal something about the health or performance of the educational system, constitute the basic building blocks of State performance accountability systems. However, not all statistics about education can function appropriately as indicators. Statistics qualify as indicators only if they serve as gauges, that is, if they tell a great deal about the entire system by reporting the condition of a few particularly significant features (p. 5).

At this time, only one of the existing six state ESA accreditation programs attempts to establish indicators for its standards. Georgia's plan includes indicators of legal adherence, and, in addition, establishes what it calls indicators of effectiveness for some, but not all, of its standards (correctly so, I believe, for indicators are not appropriate nor are they necessarily important for all standards, just those where there exists a consensus that they are significant and tell something important about the workings of the agency).

SOME OBSERVATIONS

A number of observations concerning the existing accreditation practices for ESAs in the six states are offered. The overriding and initial point to be stressed is that despite major perceived structural limitations in most of the first generation programs, the six states are also clearly in the forefront of many other states who both symbolically and figuratively have for many years supported a state network of education service agencies, yet have allowed their units to operate on a long leash concerning the twin, and often inherently paradoxical, concerns of organization improvement and accountability.

Whatever their motives, by moving into this realm the six states have demonstrated a commitment to place the frequently murky, and at times awkward, ESA fixtures in their respective state systems of elementary-secondary education squarely in the mainstream of the system.

But the present programs, as relatively ambitious as they are, appear to be hampered by several design deficiencies. Four highly related concerns are especially troublesome. Most importantly, the mission of an ESA ought to be clearly stated and then reflected in all subsequent dimensions of the exercise, especially in the development of standards and indicators of quality. While most states establish a (usually rough) mission statement in their state plan, there is the impression that it is subsequently ignored or greatly minimized. For example, most ESAs have as one of their primary charges the responsibility to provide services needed by local systems. Yet most of the accreditation plans either weigh how the ESA engages in this critical activity equally with other considerations or ignore this all-important organizational effectiveness dimension altogether.

Second, many states do not appear to have a clear conceptualization of the organizational-structural or process characteristics of an ESA and how these differ from a local school district. Most comprehensive ESAs do differ in fundamental ways from other types of educational organizations and it is important that these differences be established and reflected in the standards and subsequent indicators of quality, as well, of course, in the processes to be used in the accreditation plan. Moreover, all dimensions of how an ESA conducts its work should be the focus of one or more standards and, where appropriate, subsequent indicators. In both of these related activities, the development of standards and indicators, it would seem that states should make greater use of selection criteria (*e.g.*, standards must clearly flow from the mission of the ESA; provide policy relevant information, minimize data collection and data analysis burdens for both the ESA and constituents; data must be appropriate, valid, reliable, comprehensive, and timely) and announce what these are. This step would not only stand as a valuable test of the previously agreed upon intent of the exercise, but would additionally serve as an important guide for work on all other phases of the exercise.

Third, as regularly implied above, even the most comprehensive and meaningful set of standards that are consistent with the intent of the exercise, compatible with the mission of the units, comprehensive in that they include all relevant context, input, process, and product variables, will still fall short of a defensible state performance accountability system for ESAs until more states than Georgia begin to wrestle with the complex task of developing indicators of quality. It could be that the reluctance of most states to do so in the first generation of their exercises is due to a lack of other approaches to the development of both standards and indicators. Or their failure to do so may be the result of a deliberate choice to approach accreditation incrementally, a viable policy strategy in those public policy debates that are likely to

be highly controversial and acrimonious. Whatever the cause, a number of faults in the existing programs are exacerbated by the absences of indicators.

Finally, while some would regard the near-total absence of significant sanctions against poorly performing ESAs as a deficiency, I am not one to do so at this point in the early development of ESA state performance accountability programs. The reasons for this position should be fairly obvious from the foregoing comments. It does seem strange, however, that presently only one state, again Georgia, recognizes exemplary practice. It could very well be that the recognition of exemplary ESA organizational effectiveness operating under existing rules, no matter how limited (especially if accompanied with financial rewards along with symbolic recognition much like that being argued for by some state and national policy actors) would heighten interest in the design of more meaningful ESA accreditation programs that would lead to both improvement and accountability of the agencies.

CONCLUDING COMMENTS

In the past I have often claimed that the state networks of ESAs in some cases are the most accountable units of school government in their respective state systems of elementary-secondary education. This argument is based on the relatively unusual set of state and local checks and balances on the management and operations of the networks (*e.g.*, required advisory committee review and/or approval of programs and services, state level authorization, review and/or approval of financial, program, staffing and facility decisions). Many of the units, driven as they are by market forces, are highly accountable in both an absolute sense and in relative terms.

However, it is clear that education service agencies, like all public education organizations, will be increasingly scrutinized as pressure continues to mount for the development of more meaningful state performance accountability systems. The pioneering work underway in the six states should prove to be invaluable in this emerging trend.

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