Challenges in Local Policy Implementation:

Requirements for Partially Accredited Schools in Virginia

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A Capstone Project

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By

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Executive Summary

This capstone explored a problem of practice – the challenge of policy

implementation for schools rated Partially Accredited in Virginia. Complex challenges exist

in the implementation of policies in public schools. Adding to the struggle of implementing

educational policies in general are the particular challenges posed when schools with low

student achievement face difficult accountability policies (Darling-Hammond, 1990; Honig

& Rainey, 2012; Mintrop, 2003; O'Day, 2002). The purpose of this study was to develop an

understanding of policy implementation at the local district level, in the context of one such

accountability regulation in Virginia – 8VAC20-131-310 – *Action requirements for schools*

designated Partially Accredited.

This qualitative case study explored implementation of the regulation in four

Virginia school districts. The researcher used a conceptual framework around the domains

of policy, people, and places in implementation, along levels of the policy chain from policy

officials to district and school leaders (Berman, 1978; Honig, 2006). Data included

document reviews and interviews with participants at the state, district, and school

leadership levels. The research question was: How are school districts implementing

Virginia's regulation for schools labeled Partially Accredited?

Findings highlighted pathways and obstacles to implementation. Many of the policy

elements frustrated implementers, creating obstacles; although leaders found pathways

when they collaborated in multi-level teams and when they implemented targeted actions

that addressed particular issues in their schools. District and school participants viewed

the context of their own schools as critical to consider, however, did not believe policy

officials accounted for school or district context in implementation. The study's findings

confirmed several themes in literature on local policy implementation and led to

implications for practitioners to clarify policy elements; thoroughly plan implementation

strategies and steps; and consider school context in implementation.

Keywords: local policy implementation in schools, school improvement, accountability

policy implementation

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APPROVAL OF THE CAPSTONE PROJECT

This capstone project, "Challenges in Local Policy Implementation: Requirements for Partially Accredited Schools in Virginia" has been approved by the Graduate Faculty of the Curry School of Education in partial fulfillment of the requirements for the degree of Doctor of Education.

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Date of Defense

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Section One: Problem of Practice

Introduction

Complex challenges exist in the implementation of policies and initiatives in public schools. Researchers and practitioners agree that policy design, the people involved, and the local context merge to influence the quality of policy implementation (Honig, 2006).

Adding to the struggle of implementing educational policies in general are the particular challenges posed when schools with low student achievement face difficult accountability mandates (Darling-Hammond, 1990; Honig & Rainey, 2012; Mintrop, 2003; O'Day, 2002). School districts have confronted these types of policies throughout the United States, and the state of Virginia is no exception. Confusion and frustration exist around the implementation of accountability regulations, particularly in schools that do not meet state benchmarks. School district personnel have complained about funding, improvement plans, and technical trainings; while state education department staff members have criticized ineffective practices in the low-performing schools (Personal communications, 2014 & 2015).

The *Code of Virginia* is the statutory authority undergirding Virginia's accountability policies. From such policies, Virginia's Board of Education created regulations that detailed what schools had to do and achieve to remain accredited. This capstone study focused on one such regulation: *8VAC20-131-310 – Action Requirements for Schools that are designated Partially Accredited.* This is the regulation outlining the steps schools are required to take when student achievement rates fall below benchmarks. Regulation 8VAC20-131-310 specified that districts had to: (1) undergo academic reviews; (2) attend technical training sessions led by VDOE; (3) adopt research-based interventions; (4) develop 3-year school

improvement plans; and (5) take additional related actions (Action requirements, 2015).

For brevity and clarity, the researcher will hereafter refer to this regulation as Regulation

310; for reference, it is listed in its entirety in Appendix A.

This capstone had two aims: (1) to explore policy implementation at the local

district level; and (2) to do so in the context of one particular, difficult regulation in Virginia

– Regulation 310. The background section that follows provides more information on

Regulation 310 and the challenges reported by districts as they attempted to implement its

requirements. Engaging in this study at this time was purposeful and significant.

Researchers note the need to study policy implementation as it is occurring, in particular

contexts, in order to gain a clearer picture of what happens at the local level when

educational policies are to be enacted (Darling-Hammond, 1990; Honig, 2006).

Furthermore, at the time of this study, the state of Virginia was grappling with policies

regarding public school accreditation standards. This work illuminated the pitfalls and

positives of implementing Regulation 310, from the perspective of the study's participating

districts, and may therefore be of use to state, district, or school leaders.

Background

Accountability in Virginia. Although this capstone examined only one regulation, it

is important to note that Regulation 310 is situated inside of a complex scheme in Virginia's

accountability system. Darling-Hammond (1990) noted, "policies do not land in a vacuum;

they land on top of other policies" (p. 346). This has been the case for the schools subjected

to regulations in Virginia. The schools already have had local policies, contextual struggles,

and a host of federal and state rules to follow. Layered atop those challenges are multiple

accountability mandates.

In fact, Virginia required public school districts to meet two measures of accountability – federal and state. Earning the Fully Accredited label indicated that schools had met the state benchmarks for accountability in test scores and graduation rates. Regulation 310 fell in this area of accountability; if a school was not Fully Accredited, it received instead one of ten other labels, from Partially Accredited categories to Accreditation Denied – given to the lowest performing schools – and was forced to comply with the required actions in Regulation 310 and others. In 2015, 22% – more than 400 schools in nearly one hundred districts – did not meet the Virginia Fully Accredited targets (Virginia Department of Education, 2015b).

But to be considered in compliance with federal requirements in Virginia, schools had to meet an entirely different set of student achievement benchmarks known as Annual Measurable Objectives (AMOs); and in the year of this study, 53% of schools did not meet these targets (Virginia Department of Education, 2015a). In many instances, schools failed to meet both measures, subjecting them to sanctions under both sets of regulations and to a dizzying maze of requirements. The Virginia Department of Education (VDOE) school improvement website included over 150 links, documents, presentations, and videos for schools to understand. School leaders were forced to navigate dozens of pages of policy material as their schools struggled with compliance.

Views from the field. The objective of Regulation 310 was for schools to regain Fully Accredited status, by improving test scores and graduation rates. The regulation used language such as "assist schools" and "raise student achievement" (Action requirements, 2015). This appeared necessary and reasonable. But educators attempting to follow Regulation 310 reported a different viewpoint. Their accounts revealed a wealth of

frustration, which may well have undermined such goals. As a principal, central office administrator, and regional program director, the researcher worked in and with schools subjected to these sanctions. In an effort to provide a multifaceted perspective on this problem of practice, she conferred with a number of practitioners affected by Regulation 310. What follows are personal experiences and first-hand accounts from practitioner colleagues that relayed some of the issues with this regulation.

In one small school district with no Fully Accredited schools, the superintendent and assistant superintendent called the implementation of Regulation 310 a "messy process," adding that there was little regard to their particular context. They were frustrated with how often VDOE-mandated trainings took their principals away from schools; and they reported mistrust on the part of staff, as teachers wondered if it was district leaders or VDOE forcing them to implement new – and often unwelcome – practices in the classroom (Personal communications, October, 2015). Furthermore, this district was experiencing declining enrollment, declining test scores, and declining faculty morale – with a large number of teachers resigning in the past two years (Virginia Department of Education, 2015c; Personal communications, September, 2015). Implementing Regulation 310 had not been easy.

In another district – a larger, urban school system – the superintendent complained that there was insufficient coordination of assistance from VDOE for implementation of mandates such as Regulation 310, and a lack of clarity on how his district would be permitted to spend school improvement funds to implement it (Personal communication, September, 2014). In this same district, a central office administrator described her principals as beleaguered and overburdened by their schools' problems and by the

directives they received from VDOE (Personal communication, May, 2014). She explained how central office staff tried to help by urging principals to streamline and connect various initiatives. When faced with one more required action –such as those in Regulation 310– leaders suggested that perhaps the schools are already doing something similar; compliance may involve just documenting it for the regulatory body.

In multiple school divisions, leaders protested the poor quality of the VDOE's technical training for school leaders that was part of the required actions in this regulation. They claimed trainings removed principals from their schools often throughout the year, for sessions not worth their time (Personal communications, 2015). Some central office staff went so far as to say they "protected" their school personnel from VDOE interference – encouraging the principals to initiate improvements as they saw fit, not as the Regulation 310 read (Personal communication, October, 2015). Furthermore, VDOE's own documents did not align precisely with school leaders' accounts of what was required of them. For instance, nowhere in Regulation 310 did it state a particular lesson plan template had to be adopted, yet several administrators noted that this was one of the first actions they were told to impose upon teachers.

Yet while school leaders were blaming the governmental entities, VDOE employees expressed equal frustration with local administrators. One VDOE staff member noted the "checkbox mentality" of some school and district leaders. She worried that principals and central office administrators want to simply check off that they complied with steps in Regulation 310, rather than considering each improvement principle as important and analyzing if it was eliciting the desired outcome for students (Personal communication, March 2015).

The Problem of Practice

Implementing complex policies is difficult for schools, and Regulation 310 in Virginia was demonstrative of this problem. Many complained that the mandate was flawed; although all agreed –superintendents as well as VDOE leaders – that accountability was necessary. When Virginia imposed required actions on already-troubled schools, that were frustrating to implement, no one was helped – especially not students. Assuming changes had to be made to improve struggling schools, how exactly should administrators and teachers make sense of and carry out accountability mandates such as this?

Purpose of the Study

The purposes of this study were (1) to explore policy implementation at the local district level; and (2) to do so in the context of one particular, difficult regulation in Virginia – Regulation 310. If school leaders are to implement policy more effectively, it will require in-depth understandings of what happens when a policy leaves the desk of a policymaker and proceeds into the implementation phase. The intention here was to tell a story of what was really happening in the implementation of this policy regulation, by conducting a case study of districts that were attempting to comply with the mandate.

This focus of this study was not particular schools; rather, it was to examine the approaches used as administrators grappled with this regulation and its requirements. The goal was to provide context-specific descriptions and findings that shed light on challenges and successes. The findings may assist school administrators who are striving to improve their schools while also realizing they must comply with VDOE rules, because the information gleaned from this capstone was derived from applied implementation work. The findings included specific insights on how districts implemented Regulation 310. A

crucial step to understanding policy implementation – this mandate or others – is to

explore how real people are doing it.

Significance of the Study

Experts have defended the need to apply qualitative, descriptive research to specific

contexts of policy enactment (Honig, 2006; Levinson, Sutton, & Winstead, 2009; Malen,

2006). Researchers have called for richer descriptions that account for contextual factors

such as teachers' understandings of policy, principals' roles, local conditions, institutional

supports, central office staff interpretations, and community politics (Darling-Hammond,

1990). Officials and scholars have stated that mandates are often ineffectively

implemented, but have not always been able to articulate precisely why. The significance of

this capstone was that the researcher conducted an in-depth, research-based analysis of a

specific policy being implemented in specific places. The work was intended to add to the

body of knowledge on how schools try to execute mandates around accountability, using

real accounts to describe challenges and findings.

Furthermore, at the time of this capstone research, the state of Virginia was at a

critical crossroads regarding their policies on school accountability. The state

superintendent of public education stressed that change was imminent for Virginia's code

on accreditation. This echoed movements across the nation to decrease testing and

increase multiple measures of school progress. As this study was beginning, Virginia

announced new nomenclature for schools lacking full accreditation (Virginia Department

of Education, 2015b), yet emphasized that different terminology was not the only issue.

The Virginia Board of Education along with superintendents, parents, teachers, and

politicians agreed that Virginia's accountability policies had to be reformed soon. This

research was timely, in this regard, adding to the body of knowledge on complexity in implementing policies, and specifically exploring challenges in Virginia schools, at this time of flux.

Research Questions

In order to explore how this policy was being implemented in Virginia school districts, the researcher conducted a qualitative case study, using a conceptual framework from Honig (2006) and Berman (1978) that supported a close examination of the policy, people, and places involved in implementation. The primary research question was: **How are school districts implementing Virginia's regulation for schools labeled Partially Accredited?** The guiding and relevant sub-questions were:

Sub Questions 1: (POLICY) How is the regulation understood by implementers? That is, what are the perceived goals, targets, instruments, and tools?

Sub Questions 2: (PEOPLE) How does a district and school involve participants in the implementation process? How do various groups and levels of authority interact and connect during implementation? What actions do implementers take to enact the regulation?

Sub Questions 3: (PLACES) How do contextual elements of a district or school affect the implementation of this regulation?

These research questions will be explained in more detail in subsequent sections, with Section Two discussing the relevant literature that undergirds the study; and Section Three detailing the conceptual framework and methods of the case study, thereby justifying the use of these questions and describing how they were answered.

Limitations and Delimitations

An obvious limitation of this study was that in gaining depth of understanding from a smaller case study, there was a loss of generalizability and broader results that a study of this issue could have revealed, had it been focused on more districts. At the same time, this was a delimitation – the aim was to provide a rich, descriptive, contextual account of four districts implementing a complex accountability mandate. The study made no claim that the findings applied to all other Virginia districts, although districts with similar problems and conditions may have found parallels in the case and interest in the results.

Another limitation was the reliance on participants' accounts and perspectives – reporting what they believe to be occurring in implementing improvement policy. While varying sources of data and the different levels of interviewees helped in this regard, the reliability of the responses was still connected to the individuals' sensemaking. Leaders who received the study's findings may not have believed the case reflected the implementation process, as they perceived it. They, too, have their own frame of sensemaking when considering their district's actions and processes.

Definition of Key Terms

Policy – Of primary note for this capstone, it was important to understand the term *policy*. The work was based on a concept of educational policy from the literature, which conceptualized policy as a broad set of principles, adopted by governmental institutions, to set in motion a course of action toward a particular outcome (Theodoulou, 1995). Theodoulou and others advocated for "a less restrictive meaning of public policy" (p. 1) because many elements are critical to fully understanding a policy, including actions beyond those stated in the policy document. This capstone study utilized a broad definition

of policy, what Salisbury (1995) termed "a program or course of action" (p. 35). These more comprehensive definitions were appropriate, since Regulation 310 sits amidst a mass of larger educational policy initiatives that fall under the umbrella of accountability policy. Regulation 310 could be conceptualized as a connector between the larger accountability policies in Virginia and the schools on which they fall. Berman (1978) also supported this concept by asserting that policy proceeds along a chain – from the highest level of decision-making that creates a policy, to government programs, and then on to local implementation of initiatives that have desired outcomes. Regulations, mandates, required actions, and improvement initiatives were parts of Virginia's accountability policies.

Fully Accredited – This was Virginia's term for a school having met all benchmarks set by the state for student achievement. At the time of this capstone, these benchmarks were: Pass rates (percent of all tests passed out of all taken) of 75% for English and 70% for each in Mathematics, History, and Science; and an 85% Graduation and Completion Index for high schools (Virginia Department of Education, 2015b).

Partially Accredited – When schools did not meet the above listed benchmarks, they were assigned a label based on how close they came to benchmark pass rates and prior years' performance. While there were a variety of labels, Regulation 310 applied to schools rated (1) Partially Accredited: Approaching Benchmark-Pass Rate or Graduation and Completion Index; (2) Partially Accredited: Improving School-Pass Rate or Graduation and Completion Index; and (3) Partially Accredited: Warned School.

Product of this Capstone

In part, this study aimed to shed light on the problem of practice: it is not helpful to merely conjecture that poor implementation is to blame when articulated policy outcomes

do not occur – in this case, when a school failed to become Fully Accredited. This capstone study intended to increase understanding of how school and district personnel perceive and engage in the implementation of this regulation.

The study also resulted in a product – a guidance document that might be used in future implementation of this regulation. The research findings dictated the content of this action communication product. Discussion around findings may inform and alert local leaders about potential implementation snares. In short, the capstone study yielded an increased understanding of Regulation 310's implementation challenges for the participating districts and a supportive tool for addressing the requirements of this regulation.

Summary

Literature supports the notion that policy implementation in schools and districts is a complex problem of practice (Burch, 2007; Cuban, 1984; Datnow, 2006; Honig, 2006; Spillane, Reiser, & Reimer, 2002). Among the issues for districts in Virginia implementing the required actions in Regulation 310 were the quantity of initiatives, the ambiguity of the regulation, and the multidimensional nature of implementation (Cuban, 1984; Honig, 2006).

Many leaders were frustrated with Virginia's accreditation mandate and some of their schools had not sufficiently improved despite attempting to implement this mandate in prior years. With the call from experts to explore policy work in specific contexts, this capstone studied an authentic problem of practice and was thus worthy of research. It examined how Virginia's regulation for schools labeled Partially Accredited was being implemented in selected districts, illuminating the complexities of people, policy, and

places along the path of a policy moving from the starting point of a state agency to the

policy's ultimate destination – the classroom.

Section Two: Literature Review

As stated in Section One, implementation of educational policy posed a complex problem of practice, especially for struggling schools in Virginia attempting to comply with accreditation mandates. In order to study this problem in particular divisions, the researcher turned to literature on educational policy to understand what was already known regarding implementation. In doing so, she found two important areas of insight relevant to this study.

First, there was an important backstory about policy implementation research; that is, how this area of research evolved helped others to understand the contextual and historical significance of contemporary studies. Second, Honig (2006) and others unearthed overarching themes on how and why it is complicated to implement policy in schools. Specifically, studies consistently found that the *people* involved, the *contexts* in which schools exist, and the actual *policy components* – the goals, targets, and tools of the policy – were elements that made policy implementation challenging. Thus, this section details selected literature on people, place (i.e., context), and policy.

In making the selection of what literature to include (since there was substantial literature on educational policy), studies that connected to school accountability policy were primarily targeted. This was a fairly broad category, because in truth, mandates for accountability and school improvement tended to include many facets: teacher collaboration, data analysis, parent involvement, reading and math initiatives, special education, assessments, and more. Reviewing the evidence from literature that was associated with accountability helped the researcher better understand exactly what

researchers had previously found in places attempting to implement policies similar to Virginia's Regulation 310.

In summary, this literature review prefaces the capstone work by delineating the history, critical components, and relevant findings for the implementation of school policies. It starts with research from past decades; describes contemporary literature and research on educational policy implementation; and details specific studies, leading to various conclusions that emerged regarding the complexity of implementing accountability and improvement policies in school districts.

Early Research on Educational Policy

Honig (2006) pointed to the need for historical research on educational policy implementation because "bodies of research ... help mark distinct evolutions in knowledge" (p. 4). The progression of policy research over time led to current understandings of complexity and multiple dimensions; and it was from this earlier and present day literature that the capstone was framed.

The 1960s – Did it work? Studies on educational policy in the 1960s marked the first phase of significant research into successes and failures as governments and agencies attempted to implement programs in public schools (Honig, 2006; Odden, 1991a). This early period of research focused largely on top-down, heavily regulated policies that aimed to spread financial resources into school districts, directed toward low-income students. A leading example was Title I of the 1965 Elementary and Secondary Act (ESEA); and researchers such as Murphy (1991) found states and districts unwilling or unable to implement the main tenets of Title I with fidelity to the law's intent. Implementation research often took the form of large-scale evaluations of such policies, usually concluding

that the programs had failed by not being implemented as designed (Honig, 2006; McLaughlin, 1987).

The 1970s and 80s – Is there more to it? From the early 1970s through the start of the 1990s, researchers took a fresh look at policies' complexities. Although Honig (2006) and others separate the research across these decades into two different "waves," the main consideration was simply that this marked the period when studies on educational policy changed in their quest to dig deeper into the problems of the policies and their implementations (Darling-Hammond, 1990; Honig, 2006; Odden, 1991a).

The focus of research in the 1970s turned to policies that were similar to those of the prior decade, but with expanded goals. For example, government agencies added special education regulations to educational policies. Literature highlighted effects of these policies, as well as bilingual and vocational education program impacts (Knapp, Stearns, Turnbull, David, & Peterson, 1991). The 1970s phase of studying educational policy implementation foreshadowed the proposed complexity of present-day policy work by suggesting that varying forces affected implementation. While previous studies were quick to blame the implementers (Honig, 2006; McLaughlin, 1987), studies such as the RAND Study of Educational Change instead delved into the relationships between the policy and the implementer, proposing a theory of "mutual adaptation" (Berman, 1978). Furthermore, researchers advanced theories on better ways of studying implementation, such as the longitudinal approach adopted by Kirst and Jung (1980) in their comprehensive study of Title I. No longer was it considered adequate to evaluate a program based on whether or not implementers completed a checklist of tasks that policy designers had created. Yet despite scholars' attempts to better explain policy implementation woes, rather than blame

or oversimplify, this decade's research still did not go so far as to say exactly how complex

components affected the enactment of educational initiatives (Honig, 2006).

The 1980s brought an even greater appreciation from researchers that policy

implementation is riddled with challenges. McLaughlin (1987) noted:

> Perhaps the overarching, obvious conclusion running through empirical research on
>
> policy implementation is that it is incredibly hard to make something happen, most
>
> especially across layers of government and institutions. It's incredibly hard not just
>
> because social problems tend to be thorny. It's hard to make something happen
>
> primarily because policymakers can't mandate what matters. (p. 172)

Moreover, in this time period, a new wave of goals and targets emerged, making the

improvement of school conditions and student achievement the focus of educational

policies. Programs and initiatives in and around the 1980s aimed policy instruments at

improving teacher practice, enhancing curricula, and increasing student achievement. To

align the research, scholars more closely examined whether or not these teaching

improvements seemed to be genuinely occurring at the classroom level (Cohen & Ball,

1990; Cuban, 1984; Darling-Hammond, 1990; Honig, 2006; McLaughlin, 1991; Odden,

1991b).

This historical context highlights how policy was studied in the past, noting that

scholars found in large measure that policies did not result in desired outcomes. The failure

of policies to yield better results led researchers to take a closer and more nuanced look at

distinct components of policy implementation.

Contemporary Policy Implementation Research

This section describes studies done in localities and organizes them into the

domains of people, places, and policies (Honig, 2006). It is important to note that Honig's

(2006) proposed components of educational policy are not separate entities to be studied

in silos. Rather, Honig stated, "Overall, these three dimensions of implementation – policy,

people, and places – come together to form a contingent and situated process. In this view,

the benefits or limitations of one dimension cannot be adequately understood separate

from the other" (Honig, 2006, p. 19). Figure 1 displays one way to conceptualize these

components and their intersections, with themes that will be further explained in this

section.

People: Dimension 1 of complexity. Inherent in any discussion of people's

involvement in policy implementation are the dual elements of who the policy

implementers are and how they carry out policy. Empirical studies and scholarly literature

produced findings that supported Honig's (2006) construct of *people* as one of the

components of policy implementation complexity. Typically the targets included teachers,

principals, central office administrators, and state-level officials. But school improvement

policies expanded further to include parents, social workers, and reform consultants or

contractors (Burch, 2007; Honig, 2006; Young, 1999). Moreover, new participants entered

the educational policy scene, making business leaders and elected officials deeply

embedded players in the shaping of policy (Honig, 2006; Malen, 2006). Suffice it to say,

many actors played roles in policy implementation. Their levels of responsibility for

shaping or carrying out policy, and the interrelationships of groups extensively influenced

implementation (Coburn & Stein, 2006; Datnow, 2006; Honig, 2006). What follows are

descriptions of such influences from various research studies.

Mutual adaptation. People carrying out policy may follow new rules, but they also

tend to adjust the rules, even if they are not creating notably different policy. Berman and

McLaughlin (1977) characterized this as "mutual adaptation," meaning "teachers could

adapt the change agent project to the reality of their own classrooms, and in turn be

changed by it" (p. 187). This dynamic of compromise in policy implementation emerged

from the RAND Change Agent Study, done from 1973 – 1977, which aimed to understand:

(1) the influences of federal policies on practices in local school districts; and (2) the

influences on local school districts of cessation of federal funding. The RAND Corporation

study was a large-scale, multi-phase research project across 18 states, examining nearly

400 projects that districts were implementing in response to government mandates. Data

from interviews with superintendents and principals combined with surveys of teachers

and student performance indicators were included in the research design (Berman &

McLaughlin, 1977). The concept of mutual adaptation helped researchers of that day

understand more about implementation woes. Moreover, it laid the groundwork for similar

theories as scholars continued to study school policy work. Berman and McLaughlin (1977)

stressed, "not only was mutual adaptation inevitable; it was desirable" (Datnow, 2006, pp.

106-107); that is, the final details of implementation may have to be resolved by the

implementer in order to gain any kind of meaningful change. One example cited in the

RAND Study, the Right-to-Read program, specified a goal of improving reading scores for

students. Right-to-Read projects directed schools to initiate targeted actions and new

procedures for literacy. But because of unanticipated issues, such as staff transfers or

parent resistance, some districts enacted components of Right-to-Read programs that they had revised or created in response to their particular conditions and problems. Documented improvements in classroom practices occurred in these schools, supporting the notion that the policy adaptation was beneficial – it allowed the school to implement improved practices, rather than simply abandoning the mandate altogether (Berman & McLaughlin, 1977).

Bottom-up policy making. The concept of bottom-up reform presents those at lower level of authority – teachers, school-based administrators, and others – as the people who create and design policy; that is "implementers such as schools become key decision makers" (Honig, 2004, p. 528). Many scholars stress that policy is created through the work – and sometimes the resistance – of the practitioners (Burch, 2007; Heimans, 2012; Koyama, 2014; Levinson, Sutton, & Winstead, 2009; Malen, 2006; Smylie & Evans, 2006). Smylie and Evans (2006) noted, "what local implementers do turns out to be what a policy becomes" (p. 187). Koyama (2014) explored the strong influence of principals as makers of local policy due to their leadership roles and their critical recognition of school conditions. As a formalized mechanism for policy development, bottom-up reforms have taken the form of site-based management, school reconstitution, or partnerships between schools and their community stakeholders (Honig, 2004). Yet allowing implementers to drive policy enactment proves challenging. To explore bottom-up policy, Honig (2004) used a case study of four specific reforms of a school-community partnership type, in Oakland, California. She interviewed 33 persons associated with policy work, in order to better understand the policy-makers' roles and dilemmas in bottom-up policies. Her research concluded that the district tended to resolve challenges by making decisions that lean

toward top-down approaches, thus diluting the concept of bottom-up policy that they sought (Honig, 2004). Other researchers echo the challenges of bottom-up reforms, but endorse their tenets, such as the need to consult school practitioners, including teachers, (Darling-Hammond, 1990) during policy planning.

Co-construction framework. Datnow (2006) built a co-construction framework for how people impact policy, highlighting the way various levels of authority in districts interpreted policy and interacted during implementation periods. She asserted co-construction as a primary way in which policy was implemented, defining it as the ways in which different groups at different levels worked together – or not – in enacting policy. Dynamics such as the relative prestige of groups; how groups felt about other groups, and what respect and supports the levels afforded one another merged to drive implementation. Put another way, co-construction means "multiple levels of educational systems may constrain or enable implementation" (Datnow, 2006, p. 107).

These findings followed from a broad longitudinal study of reform efforts at 12 schools. From that larger work, Datnow (2006) drew data from one elementary and one high school, providing a detailed account of their reform in order to explore co-construction. The two schools participated in Comprehensive School Reform (CSR), the federal government initiative of the 1990s and early 2000s that provided funds for schools to adopt research-based programs as their reform models. Data was gathered across the years 1999–2003 in the form of interviews with teachers, document reviews (such as school improvement plans) and case reports drawn from the larger body of data. Datnow concluded that the nature of the organizational levels involved in CSR implementation affected the policy's success to a significant degree. She stressed how a policy will be

enacted at any given school comes from multiple levels of the system in which the school is nested. These levels encourage or neglect specific measures to enable a policy, (fund it, provide staff training, communicate goals), but they also affect one another. In the case of the elementary school that was ready to begin their comprehensive reform, its staff had little support or collaboration with the district office. In both schools, the state department kept pressure on for high test scores. One finding of Datnow's work was that regardless of the reform, a school in improvement status will need multiple layers of support, communication, shared expectations, and cooperation to see success (Datnow, 2006).

Sensemaking and changed practice. Spillane, Reiser, and Reimer (2002) situated their discussion of policy in a cognitive frame. They argued that a person's understanding of policy would be based on several variables unique to him or her – setting, beliefs, and prior knowledge – as well as the messages and representations of the policy itself. The research underscored the need for clear communication of the policy, noting that those implementing new initiatives in their schools must hear more of the "deep underlying principles rather that the superficial aspects of specific examples" (Spillane et al., 2002, p. 416). The authors also reminded policymakers that for individual sensemaking to lead to a positive interpretation of a new policy, people must see a problem in their old way of doing things, so as to develop an internal desire to embrace a change.

Trust and social capital. Smylie and Evans (2006) explored policy implementation through yet another lens. That is, through review of research and real-life cases, they elaborated on theory surrounding social capital in schools and how it affects reform efforts. The authors define social capital as "the nature and function of social relations and their capacity to support individual and collective development and behavior" (Smylie & Evans,

2006, p. 188). It can also be understood through its components: social trust, communication channels, and norms and expectations. Trust is the basis for action in a school, say the authors, because people who trust one another believe there is joint accountability for results. Trust and communication can also mean that staff believes work is predictable and that they are well informed throughout a reform. An additional part of the theory is the presence or absence of closure in the social structures of a faculty. Closure means that members of the group are interconnected and do not generally compete or conflict with externally related players. Strength of the actual relationships plays a role, too, in social capital theory (Smylie & Evans, 2006).

Findings stemming from this theory can be found in the Chicago Annenberg research project of the mid 1990s, along with other cases that Smylie and Evans (2006) cite. These cases highlight the following:

- Social capital can have a positive effect on implementing new policy by capitalizing on shared beliefs; management of the initiatives by the school staff themselves, who are trusting and close-knit; and strong organizational culture.

- Social capital can have a negative effect on implementing new policy by affecting informal structures that are generally self-selective. Teacher leaders may emerge (and may not always be positive figures). Private, autonomous attitudes can surface to shut out receptivity to reform practices. Social capital ensures these attitudes will be shared and are often a deterrent to change.

The Chicago study posits that social capital will change the course of policy implementation at the school level. The authors caution that its impact should not be underestimated when a school is facing the need to embark on new reforms.

Implementation is affected by staff trust of leadership, shared norms and values, and communication (Smylie & Evans, 2006).

Organizational fields. Burch (2007), in building a framework around institutional theory from which to study educational policy, explored organizational fields – the professional groups and alliances among educators built around a broad issue such as literacy education, assessment reform, or math standards. Burch's case study centered on a large public school division in the process of adopting several education improvement policies. Glendale School District served approximately 100,000 students in 202 schools. Burch conducted interviews of 34 central office administrators and 48 school administrators and teachers from 10 schools. She asked staff to describe their work, challenges, and reform efforts, as they perceived them. The connection to the element of organizational fields was made, as "respondents were asked to identify the individuals, organization, and materials that they saw as enabling or impeding their work on the reform" (p. 87). Burch connected the influence of organizations to the district's reading and math reform efforts.

Among other things, Burch (2007) discovered that the implementation took different paths as people in professional organizations – the math versus reading institutions – favored their own priorities. While the district policy documents communicated a common vision for both areas (literacy and math), the specifics unfolded differently. Burch was able to validate her hypothesis that "variation by subject matter in district professional development practices and other reform activities reflected field dynamics as much as the district's formal policy design" (p. 87). Math reform came largely in the form of increasing teachers' content knowledge; reading reform came from changes

to the instructional strategies teachers were employing. Although there were fewer math

support staff members in the central office, external organizations such as professional

associations played a role in shaping the reforms. Burch noted that the policy design and

documents did not reflect fundamental and important differences in the reform initiatives

of these two key areas. Her research revealed distinctions in the way organizational fields

affected policy implementation (Burch, 2007).

     Communities of practice. Coburn and Stein (2006) viewed a community of practice

as the unit of analysis in studying education policy implementation. The authors defined

the term community of practice as "a group of individuals who, through the pursuit of a

joint enterprise, have developed shared practices, historical and social resources, and

common perspectives" (Coburn & Stein, 2006, p. 28). The authors emphasize that such

communities are not limited to grade level teams, high school departments, or even whole

schools. Communities of practice could also arise from informal networks where "learning

unfolds" (Coburn & Stein, 2006, p. 28). Coburn and Stein offer empirical research on how

such communities affect implementation. Two studies – one on changes in California's

reading policy and a second done in a New York City district around balanced literacy –

reinforce communities of practice as integral to policy brokering.

     A qualitative study on reading policy, done in California by Coburn (2001), was the

basis for conclusions drawn regarding communities of practice. This larger study in an

elementary school included over 130 hours of observations of teachers in formal meetings

and informal conversations; 57 interviews with 18 teachers; 3 interviews with the school's

principal; and 106 hours of classroom observations. From this data, Coburn and Stein

(2006) homed in on how teachers' relationships and the communities of practice they built

affected their implementation of California's new reading initiative. A new textbook series that was adopted per the new policy was met with quiet resistance from one community of practice – a loose network of one kindergarten and three first grade teachers – who met regularly and did not view the new book as helpful in their own paradigm of how to teach reading. In contrast, another community of teachers was open to the new initiative. In short, different teachers adopted and adapted the new reading policies in varying ways based on the communities of practice to which they belonged (Coburn, 2001).

Additional qualitative and quantitative data from a four-year study in New York City yielded findings about how varying communities of practice can make policy implementation effective. Through interviews of multiple levels of leaders and teachers, observations, survey data, and student achievement results, Coburn and Stein (2006) posited that this district built "connections among these often disparate communities" (p. 39). Along with policy instruments such as literacy frameworks and classroom walk-throughs, leaders in New York City's District 2 guided teachers into an authentic use of the Balanced Literacy plan they had adopted. Leaders believed alignment and coordination resulted from efforts to help groups of teachers understand the new requirements and to work across, not just within, the communities of practice.

Conclusion – People as an element of implementation. This portion of the literature review highlighted some of the ways research has described people molding and shaping policy implementation. Yet people do not enact policy in a vacuum. What follows is literature on the effects of context on educational policy.

Places: **Dimension 2 of complexity**. Malen (2006) stated, "policies unfold in nested contexts" (p. 89). What worked effectively in one district may not have the same outcomes

in another; what looks like best practice when viewed in one school could be a failure in another. Honig (2006) elaborated on this idea, using the term "places" (p. 14) to describe various elements of context. She proposed aspects of context such as: (1) government organizations, local school structures, and the differences in how they operate in implementation initiatives; (2) historical and contemporary dynamics of school districts; and (3) links between districts and institutions they are connected to, such as city government (Honig, 2006, pp. 14–19). Years of policy research supports the premise that context changes policy enactment, dating at least as far back as 1978 when Berman explained the RAND study results, noting, "it became apparent that the *same* technology was implemented in different institutional settings with very different results" (p. 161). What follows are specific study references that support place as a critical domain of implementation and defends the need to study policy implementation in the place it is occurring (Cuban, 2013; Datnow, 2006; Malen, 2006; Theodoulou, 1995).

   Political dynamics. Betty Malen (2006) discussed policy adoption and implementation in terms of political processes, with particular attention to the people and context involved. Malen's primary assumption was that "policy implementation is a dynamic political process that affects and reflects the relative power of diverse actors and the institutional and environmental forces" (p. 85). This political framework conceptualized a primary need to identify important players and to understand their influence, beliefs, and powers in attempting to enact a policy or reform. Malen's case study of politics in policy detailed an attempt by a superintendent to reconstitute a school system. The author gathered data from interviews, to develop a complete understanding of how local context and political forces influenced policy. While the district's superintendent

sought to be ahead of the state department in its policy of school district takeover as a means of reform, his miscalculated and often covert actions resulted in virtually no base of support. Under the pressure of faculty anger, parent support of the school staff, negative media coverage, and flagrant broken promises on his part, his perceived savvy politics ended in a defeated reform effort.

Malen (2006) concluded: (1) *Dilution* of policy can result when politics are involved; (2) the power of particular players can *nullify* policy altogether; and (3) some policy can be *amplified* and well-enacted, if stakeholders and conditions allow it. The author wrote "policy implementation is a messy process" (Malen, 2006, p. 101) and the potential political ramifications must be anticipated.

Local school dynamics in policies connected to NCLB. Koyama (2014) explored New York City principals attempting to implement initiatives connected to No Child Left Behind (NCLB). Context emerges as an element of implementation, because the author found that leaders found it necessary to mold mandates to their own school needs. Following earlier work in which she examined implementation of NCLB, Koyama interviewed 15 New York City administrators – 12 principals and 3 division administrators – as critical data for this case study. The interview data, along with document review and field notes, formed the basis for studying various schools' responses to "testing and data-monitoring policy directives" (Koyama, 2014, p. 280). Koyama investigated principals' work, using ideas of Fenwick & Edwards (2010). Their lens of assemblage and actor-network theory asserted that a variety of people, materials, negotiations, networks, and links order and influence policy requirements.

Through multiple iterations of coding participant responses, the author found that principals managed policies regarding student data – the storage software, disaggregation of it, and required displays or data walls – in ways tailored to their own settings. For example, when mandated software failed, some principals purchased alternative data packages with their own school funds. Battles over using the district wide system as opposed to software obtained by individual principals did not deter some from continuing to use alternative systems. Furthermore, Koyama (2014) uncovered that depending on their contexts, principals took a teach-to-the-test tactic, or strongly discouraged that practice. Schools approached mandated data walls – displays of student progress – through their own sensemaking lenses and staff dynamics. Koyama concludes that principals "play active policy roles" and "need to consider institutional circumstances" (p. 279), providing further evidence of context's role in policy implementation.

Readiness for new policies. Literature asserted that temporal factors add a contextual element, affecting whether or not a district or school was ready to implement a policy. DeMatthews & Mawhinney (2013) concluded that special education inclusion was not a universally understood model that fit easily into the urban district the authors studied; rather, leaders should have taken unique local factors into consideration in the implementation of inclusion. The authors studied policy implementation at the district level, focusing on special education inclusion practice through a qualitative study of five schools in a U.S. urban school district struggling with legal issues surrounding IDEA compliance. Collected data included documents (policy documents, memos, training notes), observations of leaders and teachers, and interviews with principals and district staff. Findings shed light on how policy and a critical issue – in this case special education

compliance and inclusion – intersected to advance or deter a school district's attempts at reform. DeMatthews and Mawhinney stress current context and the way a district may be evolving during reform as critical factors. The authors remark, "the case suggests that challenges related to the district's context and condition may have played an important role in shaping the way the district developed policies" (DeMatthews & Mawhinney, 2013, p. 21). For instance, factors such as their history of special education non-compliance, budget shortfalls, and insufficient capacity to support schools in employing more inclusive models of instruction led to extreme policy implementation hardships (DeMatthews & Mawhinney, 2013).

Contextual factors may just as likely lead to a policy's success. Hipp, Huffman, Pankake, and Oliver (2008) documented the continuing work of two schools implementing professional learning communities (PLCs) in order to sustain improvement and impact teaching and learning. The authors conducted case studies in two southwestern schools, one elementary and one middle school. Data were gathered from interviews of staff members in multiple phases as a part of a larger study, and from surveys on culture, efficacy, and learning communities. Regarding places as an implementation factor, Hipp et al. note both schools had contextual factors that were "likely to influence the school's sustainability as a PLC" (p. 191). Their research details such factors, including the two schools' commitment to student achievement as their top priority. Leadership at the schools was noted as a clear strength, as was teamwork. Both schools made the procurement of necessary resources a priority, so that PLCs could do their work. Lastly, the authors stress that time was a factor in the development of this PLC initiative, emphasizing

that these schools planned for a multi-year implementation, based on research, such as that

of Fullan (2007), supporting sufficient time for true change to occur (Hipp et al., 2008).

   Social capital as an element of school contexts. As previously discussed, social

capital impacts policy implementation to a significant degree (Bryk, Sebring, Allensworth,

Luppescu, & Easton, 2010; Smylie & Evans, 2006). Research on the Chicago School Reform

Act of 1988 led to conclusions about social trust, communication channels, and norms and

expectations – specifically that these elements promote or impede reform attempts. Smylie

and Evans (2006) further connect social capital to context, noting, "the relationship

between social capital and implementation may not depend so much on policy type as on

more situational matching of social capital in particular contexts to specific programs,

policies, and practices at hand" (p. 193). The Chicago study examined the role of

community context, finding that the same reform attempts played out very differently

based on school neighborhood factors of family income, area racial composition,

percentage of children in foster care, religious affiliations, neighborhood crime rates, and

other external influences. Context of the school's community played a role in success of the

school reform (Bryk et al., 2010, pp. 158-196).

   Conclusion: Place as an element of implementation. The aforementioned

literature defends context as a critical factor in implementing a policy (Datnow, 2006;

Malen, 2006; Smylie & Evans, 2006; Spillane et al., 2002; Theodoulou, 1995). Just as the

people shape the enactment of an initiative, so does the context in which they work.

   Policy: **Dimension 3 of complexity**. Experts add an additional element of

importance to implementation research; that is, the policy itself has elements to be

considered (Burch, 2007; Heimans, 2012; Honig 2006; McDonnell & Elmore, 1987; Nielsen,

Barry, & Staab, 2008). Policy can be conceptualized around goals, targets, and tools or

instruments used to enact it (Honig, 2006). Among the documented problems schools faced

in implementing policy was having clear policy goals and focusing the initiative on the

intended outcomes throughout implementation (Chrispeels, 1997; Honig, 2006; Spillane et

al., 2002; Young, 1999). Furthermore, tools for policy implementation, such as building

capacity or funding, comprised an important element in policy design that may support or

impede implementation.

     Tools. It is critical to understand the tools that policymakers utilize. McDonnell and

Elmore (1987) outlined four types of policy instruments that policymakers may use to

enact policy. In investigating how instruments shape policy, the authors detailed types of

tools, as summarized in Table 1.

     McDonnell and Elmore (1987) drew upon empirical research and informed theory

not only to define policy tools, but also to discuss assumptions embedded within certain

instruments and to compare tools. For instance, an important distinction between

inducements and capacity-building tools is that inducements assume the capacity is there

and the policy will be enacted, if only the agency has the resources to do it. Capacity-

building instruments may also bring money or other resources, but it is thought that the

organization is going to need training, information, or development before it would even be

able to put this new policy in place. An assumption of system-changing instruments is that

"existing institutions, working under existing incentives, cannot produce the results that

policymakers want" (McDonnell & Elmore, 1987, p. 143). The authors further studied why

designers of policy choose the tools they do, noting that they determine what is achievable,

based on the way they define the problem, local preferences, expected responses to the tools, and technical needs (McDonnell & Elmore, 1987).

Beyond literature that defines and describes policy tools, findings from studies on policy tools demonstrate how they affect implementation. Chrispeels (1997) chronicled California's policies on educational reform in the 1980s and 1990s – looking specifically at how the policies played out at the local levels. Her work highlighted the policy tool of capacity building. The study focused on a policy creating a new assessment system, with Chrispeels examining extensive policy documents and interviewing nearly 250 people in the San Diego region. Through multiple iterations of data analysis, the author explored how educators implemented the new assessment system. An important component of the policy was teaching the teachers and administrators, and so "educators attended as series of professional development academies designed to increase their knowledge and skills about alternative assessments" (Chrispeels, 1997, p.456). Chrispeels reported that her study "confirmed the critical nature of capacity building as a policy instrument that facilitates the implementation and adoption of the policy texts by educators" (Chrispeels, 1997, p. 477). She found that the professional development, which included teacher involvement in developing frameworks and assessments and teaching teachers how to best implement alternative assessments, served as the basis for changing practice. Moreover, even after the state vetoed continued funding of the initiative, teachers continued to utilize alternative assessments. The tool of professional development served as a catalyst for the change in instructional practice that was sustained beyond the life of the policy (Chrispeels, 1997).

While Chrispeels (1997) showed the positive case of capacity building, Datnow (2006) documented the negative case, as inadequate staff training contributed to failed

comprehensive reform in a Florida school. In the study cited earlier in this paper, the author found that multiple layers of support are needed in school reform. Specifically, the high school struggling to implement a school reform program consistently reported a lack of sufficient professional development as the largest barrier to effective implementation. Her research concluded, among other points, that if policy tools are not in place, implementation may fail (Datnow, 2006).

   Policy targets and goals. Challenges in implementation can grow from policies being poorly defined, ineffectively developed, having ambiguous goals, or relaying insufficient understandings of the targets (DeMatthews & Mawhinney, H., 2013; Young, 1999).

   Young (1999) demonstrated an example of flawed policy in an exploration of the policy development process of a parental involvement initiative in an urban elementary school in Texas. In two stages of research, Young utilized both a traditional framework and a critical perspective to explore the school's parental involvement component. Through interviews, observations, and document review, the researcher collected data on the policy's development and implementation and compared this initiative to Fullan's (2007) model for effective school reform. She concluded that the policy development was "far from stellar" (Young, 1999, p. 693), noting a need for this school to involve the participants – in this case the parents – not just the policy designers on staff. Young found both staff and parents believed the policy goals were "more rhetoric than reality" (p. 700), thus diminishing the chance for effective and meaningful implementation and outcomes.

Summary

Research on policy at the local level supports implementation as problematic due to the myriad of factors affecting it. The elements of policy design, people, and places – suggested by Honig (2006) – frame the complexity of implementation, reinforcing the need to further study local districts implementing real reform initiatives. This literature review detailed some of the studies and informed theory on implementation, with considerable research done on actual schools and districts attempting reform efforts, yet being caught in the challenges of effectively putting these measures into place. The summary of research presented here supports implementation as a genuine problem of practice, describing factors such as people's networks, resistance, understandings, and desire to alter policy; political, local, and community contexts; and policy instruments and goals. Findings from studies often revealed a better view of the problems, but quick solutions were not suggested. The literature supports continued examination of districts enacting policy to both understand and improve implementation (Darling-Hammond, 1990; Honig, 2006).

Section Three: Methodology

This study sought to develop an understanding of policy implementation at the local district level, in the context of a complex state education regulation in Virginia – Regulation 310. In order to gain insight into the policy implementation processes, the researcher conducted a qualitative case study informed by a research-based conceptual framework. The following sections describe the conceptual framework and delineate the methodological approach.

Conceptual Framework

District implementation of VA Regulation 310, as discussed in a previous section, has significant consequences for numerous local school districts. Two theories provided the crucial lenses for the capstone: 1) domains of complexity (i.e., the multiple domains of policy implementation complexity) (Honig, 2006), and 2) the policy chain (i.e., the various levels through which a policy passes) (Berman, 1978). This section describes these ideas, and delineates how, together, they presented a suitable framework for a study on local policy implementation.

Domains of complexity. The primary theoretical grounding for this study was drawn from Honig's (2006) work, depicted in Figure 2, positing the domains of people, places, and policy as the elements that shape the implementation of policies in education. The previous section's literature review supported this notion. The significant effects of the three domains on implementation, both individually and in combination, led the researcher to frame the capstone study around them.

The policy chain. The second guiding theory was drawn from Berman's (1978) notion of a "policy chain." He concluded that in the process through which a policy evolves

from conceptualization to outcomes, there lie several "passages" (Berman, 1978, p. 166)

through which the policy moves. Berman's theory of a chain in educational policy

implementation is illustrated in Figure 3 and he described the various stages and

hierarchical levels as follows:

> ...the policy passes through and is implemented sequentially by various
>
> organizations, so that the output of one implementing organization becomes the
>
> input for other organizations. The final implemented program, and hence the
>
> policy's outcome, depends on these passages. (p. 166)

In the case of Regulation 310, Honig's (2006) domains of implementation and

Berman's policy chain are both relevant. Accountability policy moves from lawmakers and

state department officials, to districts, to schools – akin to the passages in Berman's (1978)

chain. All the while, people are assigned to execute various policy actions, in the contexts or

places in which those people operate. Combined, these two approaches form this study's

conceptual framework and provide a lens for exploring various facets of implementation at

all relevant levels. Figure 4 depicts the manner in which Regulation 310 can be organized,

highlighting both concepts.

Summary. Maxwell (2005) stressed that the conceptual framework of a qualitative

study should guide the researcher in defining the major variables under consideration,

their relationships, and the plan for studying them. He described the conceptual framework

as a knowledge base "to inform the rest of your design" (Maxwell, 2005, p. 33). Thomas

(2011) similarly recommends the use of a flexible framework, noting that it should "help

you to think about and understand the subject in hand" (p. 126). The literature reviewed

for this study made clear the importance of participants and contexts at a variety of levels

in the implementation process. As such, Honig's (2006) dimensions and Berman's passages of implementation (1978), provided a logical framework for composing the research questions guiding this study and, subsequently, for the development of protocols for interviews, the review of documents, and the coding and analysis of data.

Methodological Approach

     Research questions. Research questions must logically stem from the conceptual framework (Maxwell, 2005; Thomas, 2011). Since the literature base and Honig's (2006) conceptualization directed attention to the elements of policy, people, and places in implementation analysis, the researcher connected those three domains to the research questions. The primary research question was: How are school districts implementing Virginia's regulation for schools labeled Partially Accredited? Sub-questions included:

     Sub-questions 1: Policy. How is the regulation understood by implementers? That is, what are the perceived goals, targets, instruments, and tools?

     Sub-questions 2: People. How does a district and school involve participants in the implementation process? How do various groups and levels of authority interact and connect during implementation? What actions do implementers take to enact the regulation?

     Sub-questions 3: Places. How do contextual elements of a district or school affect the implementation of this regulation?

The above research questions guided the design of this study, including the type of data collection tools employed, the forms of data gathered and examined, and the strategies used in the data analysis.

Research Design

This study employed an exploratory case study methodology with multiple-case design to address the research questions articulated above (Thomas, 2011; Yin, 2009). According to Thomas (2011), "an exploratory case study will be done where you are faced with a problem or an issue ... You need to know more: what is happening and why?" (p. 104). Furthermore, Thomas emphasized the requirement that the researcher reflect not only on purpose (i.e., exploratory), but also on the case's subject, approach, and process. This case study emerged in part due to the researcher's involvement in school districts in the midst of implementing this Regulation 310. Thomas calls this a "local knowledge case," stating that the "subject" or "choice of focus" (p. 76) is a phenomenon that the researcher has access to study. The approach of the case study was revelatory – a valid approach when "the descriptive information alone will be revelatory" (Yin, 2009, p. 49).

The primary unit of analysis in this study was the implementation process for Regulation 310. In other words, the focus of the analysis was the implementation process. In an effort to gain sufficient views and have ample, relevant data for analysis, the researcher collected data from multiple people and documents. Data were collected in four school districts and from state department sources. Thus, the design included multiple-cases – each of the four school districts served as one of the cases studied, as shown in Figure 5.

This design allowed the researcher to fully explore the implementation process, by having ample data sources and comparisons of implementation across districts. Each data source provided unique insight into the implementation process. Interview responses revealed the nuances of the elements affecting a leader's ability to implement the

regulation (Remler & Van Ryzin, 2011; Silverman, 2011; Yin, 2009). The contents of the

documents reviewed shed light on the technical, recorded aspects of implementation, and

provided a source of comparison for interview data.

Selection, Access and Participants

    Selection and access. A critical question was the selection of districts to serve as

the participants. Virginia has nearly 100 districts that are attempting to implement this

regulation, with more than 400 schools not meeting targets for full accreditation. The

approach to the selection of districts centered on purposive sampling (Remler & Van Ryzin,

2011). This aligned with the scope of the study, limiting the number in order to gain robust

descriptions (as opposed to aiming for a large sample, where generalizability would have

been a goal). In order to study Regulation 310 in districts where it is currently being

implemented or had been in recent years, the researcher chose participants due to their

status of Partially Accredited. She also narrowed the wide variability across all 134 Virginia

school districts by selecting districts with some commonalities, such as similar size and

community setting. This approach helped the findings to be relevant not only to the

districts studied, but possibly to school divisions comparable in size or context to the

participating schools. Within the narrowed group of 55 smaller, non-urban districts, 34 of

them had at least one Partially Accredited school.

    In summary, selection criteria for participation included multiple conditions. At the

time of the study, the district must:

- have or have had at least one school not meeting the label of Fully Accredited for

    more than one year (in order to have current knowledge of the regulation).

- fit into the contextual category of a small or medium-sized (9 schools or less), non-urban district.

- be accessible to the researcher and willing to engage in the study, i.e., allowing both central office level and one or more principal(s) to be interviewed.

- include staff members who have been employed by the district for at least one full year (to avoid a lack of knowledge on implementation).

Upon IRB approval, multiple districts were contacted with initial email letters, (see Appendix B), to obtain district-level approval for the researcher to contact individuals in the district to participate in the study. Four districts granted that approval, allowing for both central office and school leaders to be interviewed.

Participants. The data collected through this study provided multiple perspectives on the problem of practice and "significant opportunities for extensive analysis, enhancing the insights into the case" (Yin, 2009, p. 52-53). The multiple leaders examined for this study enabled the researcher to gather a rich dataset for each setting, while the four distinct districts as cases allowed for cross-case comparisons.

The policy chain concept (Berman, 1978) informing the study's theoretical framework supported a focus on multi-level participants – from VDOE to district central offices to school buildings. Thus, the data for this study were gathered within four districts – with school and district leaders interviewed – as well as from the VDOE. Interview data were obtained from 12 participants and documents were gathered from multiple sources. Table 2 summarizes the participants and the rationale for their inclusion.

Data Collection and Analysis

      Data Collection. Data was collected during the spring of 2016 using two primary methods: semi-structured interviews and document collection. As discussed below, these approaches provided the most appropriate and reliable methods for addressing the study's research questions.

      Interviews. The primary instrument used was the semi-structured interview protocol. One was designed for the policy-maker level and one for district and school personnel. Because the study explored how the implementation process was unfolding, interviews "offered a rich source of data which provide access to how people account for both their troubles and good fortune" (Silverman, 2011, p. 203). Moreover, semi-structured interviews were used in this study, as the research questions demanded examination of how policy implementation occurred. According to Remler and Van Ryzin (2011), open-ended questions in semi-structured interviews "encourage detailed and in-depth answers" (p. 63); given the nature of this study, detailed and in-depth answers were necessary to collect sufficient and descriptive information on the topic. Appendices C and D contain the interview protocols and questions for this instrument. The researcher used language drawn from the Virginia regulation and the conceptual framework to construct interview questions. Technical protocols for the interviews followed guidelines such as: having fewer than 20 questions; creating open-ended questions with probes that followed; allowing ample time; using "what" and "how" questions; practicing adequate response time; and minimizing interjections (Remler & Van Ryzin, 2011; Silverman, 2011).

      Documents. Silverman (2011) defended the deep exploration of text in qualitative research, stressing that it often is more than simply "background material" (p. 233). The

large volume of VDOE and school-based documentation demanded utilization of written texts as primary data. Most often, participants voluntarily supplied the documents collected. This was optional, but many provided electronic or paper copies of school improvement plans, guidance documents, agendas, data summaries, or regulatory materials. Some participants recommended relevant documents that could be found on websites. Lastly, the researcher collected publically available documents on Regulation 310 such as presentation materials and report templates.

Timeframe. The researcher collected and analyzed data in multiple, overlapping stages, in part because data collection was done in the springtime. At this point in the school year, although the districts had consented to participate, the scheduling of interviews was challenging due to end-of-year assessments, teacher evaluations, and other school-year closing responsibilities of leaders. The researcher scheduled interviews with consenting participants at their convenience. Table 3 shows the actions and timeline connected to data collection and analysis.

In the data collection phase, interviews were audio recorded, transcribed to text, read and reread with errors corrected. Subsequently, interview transcripts were sent to each participant for member checking. Member checking on the part of the participants was optional, but the researcher did receive confirmation of accurate transcriptions from over half of the interviewees.

Analysis. Experts agree that in qualitative data work, the researcher must begin analyzing data immediately, rather than waiting until all data are collected to begin making sense of it (Stake, 1995; Silverman, 2011). Thus, analysis started at the time of the first interview and continued through the development of findings.

The researcher engaged in a process of describing, analyzing, and interpreting data (Wolcott, 1994), while maintaining alignment with the study's conceptual framework. Wolcott (1994) explained that description, analysis, and interpretation are not "mutually exclusive … nor are lines clearly drawn where description ends and analysis begins, or where analysis becomes interpretation" (p. 11). Likewise, the researcher's process of transforming the collected data into findings included overlapping and recursive stages. Also important were the steps of: (1) data preparation – organizing transcripts, responses, and notes; (2) data reduction – summarizing the information and thus decreasing the actual volume through coding and memo-writing; and (3) data display – creating narratives, charts, matrices, and figures that display the data (Johnson & Onwuegbuzie, 2004; Remler & Van Ryzin, 2011). Each of these steps is described below.

Preparation. To prepare the interview data, the researcher checked transcripts by listening multiple times to the audio versions while rereading transcripts. Once accurate, she loaded them into NVivo©, the computer-assisted data analysis software utilized in this study. In addition, documents were organized into a comprehensive list, noting each document's name, source, purpose, case connection and relevance. Selected documents were also loaded into NVivo©. Lastly, data organization included the creation of filing systems and templates for researcher-created notes, jottings, and analytical memos.

Initial coding. As a means of describing and analyzing the interview data, the researcher employed extensive coding work. She utilized two methods for creation of the initial codes: a deductive approach generating 18 provisional codes that closely connected to the conceptual framework domains of people, policy, and places; and an inductive approach resulting in 28 codes gleaned from repeated phrases, emerging concepts, and

critical ideas drawn directly from the interviewees words and thoughts (Miles, Huberman, & Saldana, 2014). Appendix E provides a list of codes created in this initial cycle. It is important to note that code creation was done both experimentally and systematically. That is, the researcher continually checked the applicability of codes to particular phrases and ideas, and used this iterative analysis to determine if codes needed to be added, subtracted, altered, or merged. While doing so, she maintained a detailed codebook of the labels, their meanings, and sample quotes; and kept notes on why and how codes were changed.

After creating the codes, the researcher coded interview data in multiple iterations over a significant period of time. She applied not only the codes as explained above, but also labels for the transcript's case (district) and level of the policy chain. This would allow for subsequent analysis to occur by case and level. By coding and recoding – through rereading transcripts, finding inconsistencies or misapplied codes, and repeating this process – the researcher increased the reliability of the coding protocol and mitigated some of the problems of being a lone researcher. In addition, a colleague coded samples from selected transcripts and provided feedback to the researcher that allowed her to refine code applications.

Further analysis progressing to interpretation. At this point, the researcher initiated a closer investigation of the coded data. NVivo© allowed for multiple types of queries and examinations of the data. This took a quantitative form when, for example, frequency matrices showed how often each level (state, central office, or principals) recorded selected codes. Software queries also assisted in qualitative ways, by allowing the researcher to readily obtain outputs of all of the narratives for each code. Matrices,

frequency tables, pattern searches, and complete narratives allowed the researcher to display and deeply analyze data by code, topic, and concept. Throughout this phase of analysis, the researcher wrote analytical memos to supplement and record significant revelations yielded by the data.

The aforementioned analysis led to the creation of a code map. Saldana (2013) discussed code mapping as an organizing tool and a way to begin to make sense of coded data. In this capstone, this was a significant step, as the researcher used a mapping process to reduce, merge, and summarize the codes "into a selected list of categories, and then condensed [them] further into the study's central themes or concepts" (Saldana, p. 194). The result of this process is shown in Figure 6.

One important aspect to this phase of analysis was the sorting of data into pathways and obstacles to implementation. The findings section presents the results of this process, offering an in-depth examination of factors that helped or hindered the implementation process.

This phase also involved the continued comparison of data from documents and interviews. Yin (2009) discussed texts as a source of evidence in a qualitative study and argued, "the most important use of documents is to corroborate and augment evidence from other sources" (p. 103). The researcher read and reread texts, ran searches or counts of relevant words (in NVivo©), and searched for patterns or key phrases that substantiated developing views.

Although not anticipated, in some cases the interviews elicited strong emotions from research participants as well as insight into their values and sensemaking. In such cases, Saldana (2013) recommended the use of "affective methods" (p. 105) in analysis.

Based on Saldana's "versus coding," seven concepts that reflected conflict (and usually

frustration) in the participants' articulated experiences were identified and explored in

order to determine where such feelings or beliefs were most prevalent. Results from this

process are displayed in Figure 7.

Of primary importance during this more in-depth analysis phase were the

connections made to the conceptual framework. Figures 6 and 7, which emphasize the

domains of people, policy, and places, and the policy chain, demonstrate the degree to

which participants in different contexts and at different stages emphasized the emerging

ideas.

Role of the Researcher

At the time of this case study, the researcher served as the director of a regional

program. She worked as a school and district-level leader in other Virginia divisions and

maintained close relationships with high-level administrators. Current and past positions

allowed access to school personnel to facilitate the study. The role of program director did

not cause a conflict with the research, but it did contribute to the researcher's interest in

this problem of practice. Furthermore, the researcher was able to interview VDOE staff in

the state's Office of School Improvement, which was critical to gathering data.

Validity and Reliability

Threats to validity were managed by triangulating in multiple ways – collecting

different data types from differing sources (Yin, 2009). The contrasting sources – school,

central office, and VDOE personnel – lent different perspectives to results, supporting the

notion that when triangulating "viewing from several points is better than viewing from

one" (Thomas, 2011, p. 68). The collection of interview responses, relevant document data,

and analytical memos provided a broad base of data to review for persistent themes and

for inconsistencies. Lastly, and as previously noted, both member checking and the use of a

collaborating coder helped to insure accuracy of interview transcriptions and reliability of

the coding process, respectively.

Section Four: Presentation of the Findings and Discussion of the Findings

Introduction

The purpose of this study was to explore policy implementation at the local level by examining Virginia's Regulation 310 for schools labeled Partially Accredited. The researcher used a multiple case study method with four districts, framed around Honig's (2006) domains of complexity and Berman's (1978) policy chain. The main research question was: How are school districts implementing Virginia's regulation for schools labeled Partially Accredited?

This section begins with a description of how Regulation 310 unfolded in the four districts. As is often the case with complex policies, the regulation was not implemented in exactly the same manner in all schools in Virginia. The district stories are presented as brief vignettes that relay individual accounts of implementation and describe the districts' contexts. The vignettes are followed by a presentation and discussion of key findings, organized around the research questions.

Implementation of Regulation 310 in Participating Districts

The Virginia Department of Education annually collects Standards of Learning assessment results on how many students passed each of the four content area tests, and uses this data to determine if Virginia schools meet accreditation benchmarks. When not Fully Accredited, a school receives one of a variety of labels, including that of Partially Accredited. Schools in this study received such a rating in the late summer or early fall following spring testing and were notified of their obligations to comply with Regulation 8VAC20-131-310 (or Regulation 310). Districts proceeded to enact various measures of the policy, designed to improve student performance on English, Math, Science, and/or Social

Studies Standards of Learning. The entire process of being deemed Partially Accredited and subjected to Regulation 310 is often referred to as a school being "in school improvement."

For several of the schools in this study, Regulation 310 implementation began with a review of the schools' strengths and weaknesses, performed either by VDOE staff members or contractors that VDOE hires to assist with school improvement tasks. This process, termed Academic Review, is not done every year that a school is labeled Partially Accredited, but is to be done in at least the first year of such a label, and in certain years thereafter, depending on state or local considerations.

In addition to Academic Reviews, VDOE's documents and participant accounts detail other requirements of the Partially Accredited schools in this study. Leaders at the district and school levels attended VDOE sponsored professional development sessions entitled Aligning Academic Review and Performance Evaluation (AARPE); worked with an assigned contractor; created a 3-year school improvement plan; and employed interventions designed to improve student achievement in the content area(s) not meeting benchmarks.

The state trainings and contractor work originated from VDOE and were prescriptive, while the school improvement plan and choice of interventions came from local leadership and were individualized for district needs and preferences. Regulation 310 enumerated items that the school improvement plan must address, but schools were free to include other areas, incorporate interventions, and utilize their own plan formats. Allowable interventions included the purchase of instructional resources or staff development programs to improve teaching. Throughout the time a school is not Fully Accredited, its staff were required to attend VDOE meetings and submits reports to VDOE.

Four District Stories

Each school district in this study had a unique Regulation 310 implementation story. The vignettes provide descriptive accounts of the essential implementation characteristics of this policy for each district.

The Case of Acadia County: **"We've done everything they've asked … and it hasn't produced the results they claim it will."** Acadia County Public Schools is a small, rural district in Virginia, serving fewer than 1,600 students. The central office and school leadership in Acadia is fairly new (under 4 years), and the area suffers from high poverty rates. A small district office staff provides direct support to schools, but the needs are great, with no school in Acadia awarded Fully Accredited status; one of their schools has been labeled Denied Accreditation.

The story of Acadia County's implementation of Regulation 310 is one of strict compliance. The required actions affect every level of personnel in the district and permeate many of their initiatives and programs. The schools undergo Academic Reviews, administrators attend state technical training sessions, and leaders work with multiple contractors assigned to Acadia. As a result of the requirements, district leaders have applied internal controls: teachers must use a lesson plan template; administrators must submit lesson plan monitoring schedules; principals must meet to analyze data; and more.

The district has attempted to make implementation work for their particular situation. Leaders began utilizing a program of professional learning emphasizing evidence-based instructional practices. Acadia leaders discuss building capacity in both principals and teachers. Central office administrators require principals to fill out certain

documents that both help the principals stay organized and hold them accountable for mandates. All schools have up-to-date school improvement plans.

Importantly, leaders relay a spirit of collaboration across the levels of central office to principals to teachers. Principals speak well of their district leaders and their teaching staff; and central office administrators talk about ways they work to assist school leaders. School administrators use frequent leadership meetings to discuss issues and challenges. Teamwork appears to be the norm.

Yet Acadia also exemplifies frustrations with Regulation 310. Principals champion their teachers' hard work, while recognizing their stress levels. Acadia believes some policy elements are ineffective, with one leader saying, "…we're not seeing a direct impact on instruction."

Administrators worry that their particular context does not matter to state officials, detailing several aspects of their community, school culture, and historical context that they believe affects school improvement. A central office official remarked, "One context here is the state doesn't understand where the division was and where it is now because they're not inside." Yet the progress Acadia has made to remedy past problems is not considered in accreditation ratings.

Acadia has not been able to climb out of school improvement status in a number of years, despite following the rules laid out by Regulation 310. This, in and of itself, serves to dishearten some of the leaders, with one describing the contrast of compliance versus results in this way:

It's not like this county and the administration here has fought the process.

Because we haven't. We have said, "Absolutely, we'll do it. We'll do it with

fidelity. We'll do the best we can." And it hasn't produced the results that they claim it will. So part of me wants to go to [VDOE] and say, "Is our focus really in the right area?" Because I'd understand if we were saying, "Well, this is worthless and we're not going to do it. You can't make us." But we haven't. We have done everything they've asked. And we've angered teachers in the process.

In short, the implementation process for the Acadia County School District exemplifies adherence to the state's guidelines, but also disillusionment around the policy and lack of positive outcomes.

The Case of Blue Knob County: **"Honestly, to me, it really doesn't matter. We are who we are. We still have to improve."** Blue Knob County Schools serve around 1,200 students in this rural district. The division-level leadership in Blue Knob consists of the superintendent, assistant superintendent, and several directors or specialists. There has been considerable turnover recently in school principals in Blue Knob, although some changes were internal promotions and thus provided consistency of leadership. One of Blue Knob's schools came close to reaching full accreditation; two are Partially Accredited–Warned status with one school under threat of losing accreditation entirely.

While study participants at Blue Knob expressed some dissatisfaction over various components of implementing Regulation 310, much more of their story conveyed an approach of digging in to determine what their own needs are – both instructionally and operationally – and working to solve problems so that schools improve. They appeared to view Regulation 310 in this light: its tenets exist to bring about necessary changes. For example, one central office administrator noted, "the things that [VDOE] is asking us to do are what good teachers should be doing."

But not all of the elements of Regulation 310 received a warm reception from the leaders in Blue Knob. One principal whose school recently underwent the state Academic Review process reflected that it amounted to a contractor meeting with him one day and a report filed afterwards, with minimal meaningful feedback. A top district leader criticized VDOE for what she sees as a lack of targeted, differentiated assistance. She noted that although local leaders know their specific problems, state officials mandate all regional underperforming district personnel attend the exact same trainings. This leader complained, "It's kind of a broad brush thing … not specific to individual schools, which I think it should be because different schools have different needs."

So while Blue Knob perceives the policy as flawed, they also have undertaken a number of initiatives in the past year that they hope bring about positive changes. From expanding access to Pre-Kindergarten to involving community volunteers to helping staff better deal with student behavior problems, Blue Knob appears committed to long-range solutions that undoubtedly affect student achievement, but may not show up on an SOL data page. Leaders show enthusiasm and pride when they talk about these improvements, and convey eagerness to keep attacking the challenges, whether or not their strategies bring an immediate uptick in test scores.

One principal exemplified this efficacy in comments about the work of improvement:

Honestly, to me, it really doesn't matter. We are who we are. We still have to improve. … who cares if we're rural, urban, small, or big. I really encourage staff … if we have low parental involvement or 75% free and reduced lunch? Then we have to do twice as well within [our school]. It's not just talking about it but really doing it.

Blue Knob's story around Regulation 310 demonstrates how on one hand, leaders experience frustration with this policy; but also work hard to face the problems at the root of low achievement, regardless of whether their actions are precisely based in a regulation's scope.

The Case of Cedric County Schools: **"I think because [the approach] from the top changed, there was a trickle effect ... you saw almost rejuvenation, like 'Okay, we can do this.'"** Cedric County Public Schools is a medium-sized district in Virginia, serving just over 4,000 students in a region that has both rural and suburban elements. The county's superintendent has served less than two years; while the principals have varied tenures.

Forced to implement Regulation 310 due to three schools that have failed to reach Fully Accredited status, Cedric County School District appears to be tackling mandates by creating internal processes and supports. Leaders and teachers analyze and discuss student achievement data, with multiple means of assessing what students are learning, given formatively during the school year. The system of evaluating students' learning uses team meetings that are both at the school level and also regular meetings at which key members of Cedric County's district-level staff visit schools in order to stay abreast of schools' progress and needs. Far from sessions to assign blame, these meetings appear to serve the purpose of bringing school and central office people together to problem-solve and collaborate.

While not as frustrated as others with specifics of Regulation 310, Cedric County isn't necessarily impressed that the required actions act as conduits to improvement either. Leaders relayed that the VDOE required trainings mean "a lot of meetings" and thus time

away from their schools and other responsibilities. They also convey concern that they have particular problems not addressed with the single stroke of one policy; for instance, the achievement of Special Education students is problematic at one Partially Accredited school. One district-level leader remarked with resignation:

> There's nothing wrong with what the DOE had provided us, but I think sometimes we just get so caught up in all of the newfangled gadgets and bells and whistles; and with either technology or some new inventive way to do something; and I'm thinking, what's wrong with good, solid, basic instruction that engages children, that really and truly keeps them excited and eager to learn?

Yet what overshadows their views of state policy is a renewed sense of efficacy from Cedric County leaders that they will be able to improve their schools. Some of this optimism originates from the onboarding of their superintendent just over a year ago. Following the tenure of a superintendent whose approach was punitive and blameful of teachers, this new leader receives accolades for his supportive, collaborative manner. An administrator stressed that his relationship-building means that the climate in the district is changing in significant and necessary ways. One principal praised him, saying:

> Teachers feels that he is approachable; that they could talk to him…I think because [the approach] from the top changed, there was a trickle effect … you saw almost rejuvenation, like "Okay, we can do this." He came in here this year, he listened and he formed committees whether it was internal or external stakeholders. I haven't heard one teacher say anything negative about him.

Cedric County's journey in school improvement at times demonstrates the same skepticism as other districts in this study regarding the effectiveness of Regulation 310. But their tackling of the issues underpinning the policy – by collaborating, building trust, examining data, and creating structures for school improvement – also showed a pathway to policy implementation that is leading to optimism, cooperation, and determination.

The Case of David County Schools: **"A good leader surrounded by good teachers is what takes a school out of improvement."** David County Public Schools consists of an elementary, middle, and high school in a county built around tourism and farming as its economic base. The school system has had general success in student assessment results, with just one school not meeting all benchmarks a few years ago; but since that time, climbing out of sanctioned status to be Fully Accredited. One other school in the district had a similar path several years before that. Now, all schools are Fully Accredited.

When telling their story of school improvement, David County leaders have little good to say about VDOE or Regulation 310. A principal called the process "backwards" in explaining that waiting for schools to fail and then offering assistance is too late for faltering districts. Their superintendent believed the contractor assigned to David County was far from helpful, only looking to collect required reports on time and not offering meaningful suggestions for improvement.

Yet while what David County leaders believed they received no real assistance from policymakers, they report a series of actions and attitudes that led the school to full accreditation. Both the central office and school level leaders relayed a belief in core values of strong leadership, collaboration, and expeditious implementation of necessary changes.

David County committed to a plan of altering their curriculum, including a tight alignment

of their local assessments, in order to see better SOL scores. They reported that this

improvement helped, and they applauded the efforts of teachers doing the work while

administrators led the charge. At all levels – high school, middle grades, and elementary

levels – leaders noted strategies that they implemented, which they believed correlated

with higher student achievement

David County's negativity toward the policy components of Regulation 310 was

impossible to ignore. But leaders also conveyed some understanding that agencies and

policies are limited, while their own ability to implement change holds the key to

improvement. Referring to her district's small size, the superintendent remarked, "I talk to

my principals every day [as does] my Assistant Superintendent. Instruction is a daily

conversation. Discussions about performance in alignment to our strategic plan and our

instructional approach are daily conversations." The principal participant went further to

talk about how instrumental certain local actions and beliefs were to her school's

improvement, saying "The thing that changed our performance was not the school

improvement process. The thing that changed our performance was that we took a hard

look and we really delved into the curriculum and to our standards…" She summed up

David County's approach when she commented:

> It comes down to looking at who's leading the schools and making sure that
>
> [you] have the best leaders in place and that they understand the important
>
> process, the work that has to be done. It is not throwing mandates at them. It is
>
> not having them attend another webinar that takes them an hour away from the
>
> work that they should be doing…I think that if the state would look more at

developing the leaders that are in failing schools, then [that's] what is really

important. A good leader surrounded by good teachers is what takes a school

out of improvement.

David County's path to Fully Accredited schools seemed to equate implementation

of Regulation 310 to their own responses to perceived needs, rather than compliance to

policy.

Presentation of the Findings

Four broad findings emerged in this case study of Regulation 310 implementation.

The findings stem from analysis of data from 12 interviews and more than 40 documents

from the four districts and the VDOE. Based upon multiple iterations of coding and the

identification of categories and themes, the researcher found the existence of pathways and

obstacles to the implementation of Regulation 310. Policy components, participants'

actions and perceptions, and contextual factors either paved the way for implementation or

posed barriers that frustrated leaders and stymied the implementation process.

Both pathways and obstacles were seen across all four districts, although

differences appeared in the intensity and nuances of both factors. Analyzing data along the

policy chain of VDOE to central office to schools enabled the researcher to observe that

certain pathways or obstacles were clearly more influential at some levels of the policy

chain than at others. Furthermore, cross-case analysis allowed the researcher to see

disparities between districts' experiences and perceptions. The researcher also found

issues and challenges that were common to all school divisions and multiple levels of the

policy chain. The findings are presented below, organized as possible answers to the

capstone's research questions and aligned to the theoretical framework domains of policy,

people, and places. Finding 1 focuses on the domain of policy; Findings 2 and 3 address people; and Finding 4 centers around place. Included with each finding are descriptions and substantiating data.

Finding 1: Policy. The first finding presents a response to the research sub-questions on policy components. Data that support this finding include an examination of policy goals and instruments, including Academic Review, VDOE contractors, professional development, and school improvement plans.

Research Sub-questions on policy

How is the regulation understood by implementers? That is what are the perceived goals, targets, instruments, and tools?

Finding 1

Participants viewed and understood Regulation 310 by way of goals, requirements, and instruments used in implementation. Their perceptions, beliefs, and feelings about these policy components varied considerably, creating both pathways and obstacles to implementation.

Goals. Participants spoke frequently of their perceptions of the main goals of Regulation 310's requirements when their schools are deemed Partially Accredited. In doing so, several common themes arose. Raising annual test scores and checking off items from the compliance list appeared to take precedence over pursuing comprehensive school improvement. Participants from all cases and levels of district respondents (central office and school leaders) referenced one or both of these ideas in interview responses. One

district leader expressed frustration with the goals by stating, "Singularly, [policymakers] have one goal, in my opinion, and nothing else was emphasized. That goal was compliance." Even when participants were not assigning blame, it was clear that they believed that the regulation's goals were inadequate. One respondent noted:

> The goal is certainly to improve student outcomes on [the Standards of Learning tests]. Let me make that very clear: on that one measure… I just don't agree that you can measure a child's success or failure based on one day's performance.

A central office level participant expressed similar sentiments, noting that "an SOL test is a snapshot in time … I would like to see a future where we're looking at growth … identifying the amount of growth that a student made [in a school year];" and a principal lamented that "every year, our scores have come up in all four subjects, but it's not enough."

The perception that policy goals were limited to compliance or improved test scores became an obstacle for implementation. This will be further explored in the discussion of the findings.

Instruments. The study shed light on how participants understood the regulation's instruments or tools used to enact this policy and the researcher found varied perceptions. Implementers found little value in the Academic Review process, but many thought the professional development sessions were worthwhile. Some participants felt the contractors assigned to assist their districts were helpful, while others conveyed little regard for these consultants. All districts believed their own school improvement plans were meaningful. The subsections that follow provide data to support the mixture of reactions to policy tools.

Academic Review. While regulatory documents and the VDOE participant interview pointed to the importance of the state's Academic Review process, none of the participating

districts viewed Academic Review favorably. This contrast became especially apparent in interview data. The VDOE official offered this view of Academic Review:

The evaluation tools are designed to be very granular. Even schools that are right there at the cusp [of meeting the benchmarks] can find holes in the curriculum or holes in the way that they are teaching or delivering instruction. The Academic Review process brings to light processes and procedures for misaligned curriculum that can be fixed.

However, responses from district participants indicated that they did not value the process. One principal remarked, "I don't see the process is very informative, very helpful, to be honest." Another principal conveyed skepticism that observers coming in for a day or two could adequately and accurately evaluate her school's challenges, noting, "As a principal you know where your problems are and sometimes what comes out of Academic Review might not be what you know the real problem is."

Furthermore, there was a lack of clarity around Academic Review. For example, the VDOE highlighted features of the review that most leaders would find helpful, such as districts including leaders of their own choosing and bringing a note taker – someone who could capture areas in which the school was close to meeting review criteria. However, study participants did not seem to know about those aspects.

In several instances, participants felt skeptical of the VDOE's approach. For example, three of the four districts noted that the Academic Review process included open criticism of teacher lesson plans, which principals saw as unhelpful. One participant described her disapproval, stating, "it is emotionally very, very, very difficult, because they flash your lesson plans up on the screen in front of everybody in a room and dissect it, and see

whether it meets their criteria or not." This led to the possible action on the district's part

of mandating a particular lesson plan template. Three of the principals interviewed, from

two districts, strongly condemned the emphasis on lesson plans, noting, "you can have a

perfect lesson plan and no ability to deliver the lesson" and "we're not seeing the direct

impact on instruction." Overall, undergoing Academic Review amounted to a compliance

step, with little perceived benefit.

 VDOE contractors. Reactions to contractors – credentialed outside personnel

assigned to assist districts subjected to Regulation 310 – varied considerably. Acadia

County expressed frustration not with particular contractors assigned to them, but with the

fact that VDOE changed their contractor annually, with one principal noting, "Every year

the Office of School Improvement gives us a different contractor, which is difficult because

everybody is different. So, there's no real consistency from year to year." A central office

leader expressed a much more cynical view, saying, "We've had a different contractor every

year; I believe that's by design because you can't blame the contractor for the lack of

success if you have a different person every year." David County participants also did not

value the use of contractors, with a principal remarking that schools do not improve from

"having other people that the staff doesn't know come in ... that doesn't take a school out of

improvement [status]." David County's central office leader went further to say the

contractor was neither "communicative nor effective." Cedric County made no mention of

contractors in interview or document data.

 But in Blue Knob, the policy's inclusion of a contractor was more positively

embraced. A central office official noted the division "had a contractor last year that we

developed a very good relationship with ... we asked if that [contractor] could come back."

Others in Blue Knob agreed, characterizing the contractor as supportive and adaptive to

their needs, someone who helped guide their discussions regarding improvement. The

instrument VDOE utilizes in designating contractors to assist districts appears to result in a

pathway or obstacle, depending on the district and the contractor involved.

Professional development. Both documents and interview data supported the notion

that professional development is a valuable tool in the process of implementing this policy.

Eleven of 12 interviewees noted professional learning as important; and the specific

AARPE sessions offered by VDOE to leaders in Partially Accredited schools were generally

viewed favorably. Of the 8 study participants who were required to attend AARPE sessions,

7 reported positive reactions. One principal remarked:

> I think anything like that's good. When you really hone in on something and then
>
> take the task of bringing it back and try to coach your staff in something. We all
>
> think we know a lot but when you sit down and you really look at everything and
>
> the process and then you have to coach people, it's different, so, yes, I think [the
>
> VDOE professional development sessions] were helpful.

Another noted that she was pleased her district made the decision to send her to AARPE

and said, "I actually enjoy the AARPE sessions, which I know some people complain about

… I was able to take away good information from all of the sessions and implement the

recommendations." A principal in the same district was less enthusiastic. Although he

noted finding the session on formative assessments as "valuable, because that is more

related to instruction," he also complained that the 10 days away from his building was

burdensome, posing the question, "How am I supposed to be observing teachers and

helping them grow when I'm not here?" The predominantly positive responses to state-led

professional development, however, pointed to this being an effective tool for the implementation of Regulation 310 and thus a pathway.

School improvement plans. The requirement of a school-created, 3-year school improvement plan was a policy component that emerged favorably in the implementation process. Each of the four districts discussed their school improvement plans in positive terms. Interview data and documents validated this pathway, detailing multiple action steps involving many school personnel.

Acadia leaders noted the requirement of insuring that findings from the state's Academic Review were addressed in their school improvement plans, but remarked that school leaders included additional actions and worked to make it a purposeful document. One of their principals called it "thorough … it addresses a lot of areas that need to be addressed." Similarly, Cedric County's school improvement plans showed a comprehensive approach to improvement and evidence of these documents being revisited and updated often – goals were checked off as having been met, data results were added in with dates of assessments, and notes on continuing progress or challenges were inserted. In Blue Knob, a central office leader and principal portrayed their school improvement plans as critical elements of their improvement process, with the principal saying, "We have action plans for each content area and … then we have an action plan for the school, which our leadership team has developed; and we frequently visit and monitor them." Finally, in David County, the principal noted, "We gathered data regularly. We talked about the plan to make sure that we were doing all of the things that we said we were doing. If we weren't doing enough we talked about why."

Moreover, the creation and use of school improvement plans appeared to align with VDOE's vision of this regulatory tool. The state department official characterized the school improvement planning process as flexible yet important, stating:

We want divisions to use what works for them. [Some] divisions have developed their own templates that include a lot more information than we would minimally require. Other divisions create a template that is similar to the essential actions report, the Academic Review findings and actions report … [even if] there are other things in the school improvement plan beyond the essential actions from the Academic Review. If they already have [a school improvement plan], then they're going to access the document they have – see what essential actions they need to add, what they need to take off the table to make it work best for the school; to focus in on what their priorities really are.

Summary. Finding 1 states that policy elements, which define and establish Regulation 310, created both pathways and obstacles to implementation. When participants believed the policy's only goal was to achieve a single set of improved test scores, or when they perceived little benefit from the state's Academic Review process, they relayed discouragement and a lack of motivation to engage in Regulation 310. But some policy components resulted in leaders feeling satisfied and supported, such as the assignment of a helpful consultant, offerings of professional development, or the opportunity to draft a customized school improvement plan. Finding 1 asserts that, for the districts in this study, Regulation 310 contains a blend of positive and negative policy components.

Findings 2 and 3: People. The sub-questions in the people dimension are addressed from data about the participants and their relationships, and specific strategies that were enacted. Finding 2 includes who the participants are, how they collaborate, and what support channels can be seen. Finding 3 describes the required and adapted actions people take; and in fact, this finding exemplifies a significant overlap of the conceptual framework domains of people and places.

Research Sub-questions on people

How does a district and school involve participants in the implementation process? How do various groups and levels of authority interact and connect during implementation? What actions do implementers take to enact the regulation?

Finding 2

Districts in this study involved many participants at varying levels – VDOE, central office, school leadership, and teachers – in the implementation of Regulation 310; and did so by creating collaborative structures and by attempting to provide adequate support to implementers. Involving people and providing supports created more pathways than obstacles.

Finding 3

Leaders took actions to be in compliance, such as meeting with VDOE personnel, submitting documents, attending professional development, and initiating improvement plans in their schools. While some viewed compliance negatively, implementers also took actions of their own choosing – not specified in policy documents – which the leaders believed addressed particular needs in their schools, thus creating a pathway.

Participants and collaboration. Finding 2 emphasizes that all four districts discussed the involvement of many participants at multiple levels to implement Regulation 310. This included the superintendents, assistant superintendents, central office staff, principals, assistant principals, lead teachers, and all other teachers. In some schools, leaders also mobilized guidance counselors, parents, and instructional coaches. As previously noted, districts were also assigned contractors and met with VDOE staff, thus involving state level personnel, too. Each of the 12 interviews as well as document review validated the conclusion that many people were utilized to implement the policy in each district in this study.

Moreover, the people that districts called upon were at all levels of the policy chain and they collaborated to address the regulation's requirements. Several structures and opportunities provided the pathway for cooperation during implementation. Leadership teams constituted the most important of these structures, and such teams were created both across and within district authority levels. Respondents discussed meetings in which central office staff and principals gathered to stay abreast of progress. In turn, all 6 principals in the study formed school-based leadership teams, which were responsible for key elements of improvement. These teams included teacher-leaders and they met regularly; took information back to grade levels or departments; and communicated often about data, initiatives, and challenges. While all four districts mentioned using leadership teams, Cedric County appeared to have the strongest organizational framework for this practice. Interviews and document review yielded data on the makeup of the teams, the frequency of meetings, and the teams' goals and objectives. The principal from Cedric County spoke in glowing terms of how much support she received from central office in

monthly meetings, noting that it was a chance for feedback without condemnation or blame. In fact, she quoted her superintendent as using this forum to tell her staff, "you all have worked really hard this year," and stressed how important the positive dialogue was to the culture of her school as well as to improvement initiatives.

In addition to pathways created by leadership teams, pathways emerged when districts authentically involved teachers in implementation and when district leaders were accessible for questions or challenges, from those at lower levels of authority. As evidence of the latter, all 6 principals appreciated being able to call a superior – superintendent, district coach, or VDOE contractor – in order to vet an idea or ask for help in solving a problem. One remarked:

> [Central office administrators] have always been there, if I call with questions or want to bounce things off of them, play devil's advocate with each other. We definitely have that relationship, at the Central Office level. I'll ask them, "I'm thinking about doing this," and they'll say, "Well, have you thought about this?"

The involvement of teachers was apparent in nearly every account. Principals consistently discussed ways that they asked teachers for feedback or assigned them to craft parts of the school improvement plans. The Cedric County central office leader noted, "We try to involve the teachers in a lot of the discussions and decision-making when it comes to specific areas that need improvement." This comment echoed every leader's explicit valuing of teachers in the process of implementing Regulation 310.

Support channels. Finding 2 also notes the concept of support for staff during difficult facets of implementation as a means of validating principals and teachers. One way this concept emerged was in participants' discussing the importance of good leadership.

Nowhere in the interview protocol did the researcher ask a direct question about leadership, yet effective leadership was consistently and explicitly discussed by interviewees from all four districts. One leader stressed her district's push to build leadership capacity among her principals while another remarked, "…it comes down to who's leading the school." Two districts compared new and better leaders to former administrators, whom they condemned for not utilizing distributed leadership or for bullying teachers and principals. One principal praised the efforts and effectiveness of the superintendent, stating, "I can't say enough about his leadership and how he has changed the culture from the top down … teachers are saying, 'it is such a difference having him because he listens.'"

In addition, principals provided support by consistently championing their teachers, characterizing them as hardworking and refuting the notion that they were solely to blame for low student achievement. An indirect yet important means of support for teachers emerged in the language principals used in describing their introduction of new plans or implementation mandates. Rather than forcing, they consistently talked about "selling" ideas to teachers, and needing to have "buy-in" for a new requirement to take hold. Some of the study's most interesting passages emerged from these types of reflections, with 5 out of the 6 principals expressing such ideas. In Acadia, a principal stated:

> It's all about selling the idea and sometimes you have to sell something you believe in and sometimes you have to sell something you're not quite sure about, and that gets kind of tough. You're like, "Okay, I know if I weren't a school in school improvement [status], we wouldn't have to put this much stress [on teachers]."

Sometimes it's a stressful change that has to happen. And it has to happen. It's my job to sell it whether I think it's always the best choice or not.

The David County principal posited that initiatives fail when, "[teachers] don't buy into what [VDOE] is selling as far as what constitutes good educational practices." Similarly, in Blue Knob, a principal described his introduction of a new literacy program in this way: "I had to sell it, because the division said we were doing it. I had to sell it, even though I didn't care for it, didn't like it." Far from being disingenuous or using a marketing ploy, principals in this study were attempting to support teachers by convincing and persuading them on new ways of doing business, rather than simply dictating a mandate.

Despite the pathways created by collaboration and support, an obstacle – teachers' stress and attrition – emerged when looking at the data around the people domain. Three of the four districts relayed multiple concerns regarding the difficulties posed for teaching staff when implementation requirements descend upon their schools. Leaders who were worried about attrition listed change, criticism of lesson plans, and extra work as examples of factors that are overly taxing for teachers. One principal remarked, "it's the fine line of holding teachers accountable and adding so much stress that they want to walk out the door." Two districts – Acadia and Cedric – spoke specifically about the difficulty of teacher turnover. Both noted that they believed good teachers to be of unparalleled importance in improving student achievement. But both of these districts stated that the constant flow of mandates stemming from Regulation 310 was a factor in causing teachers to leave their districts to teach elsewhere.

Required and adapted actions. Finding 3 describes the actions that school personnel take to implement Regulation 310. The researcher found that participants not

only enacted the policy's requirements, in order to comply, but also that leaders took other context-specific actions.

After their schools are labeled Partially Accredited, leaders initiate actions that align with policy documents: submit materials and undergo Academic Review, create or modify the school improvement plans, attend trainings, and continue to file required paperwork. Leaders characterized such actions differently across cases, with one district leader saying, "I don't see it as extra work … I see it as a way to improve teachers." Others used words like "stringent" and "tedious" to describe the prescribed actions. Some objected to the time needed to attend so many meetings, or the lack of pre-emptive support from VDOE of their troubled schools. Regardless of individual perceptions, however, each district and school enumerated actions to prove that they complied with the regulation's requirements.

A second part of this finding, however, demonstrates an important intersection of the study's conceptual framework domains of people and places. The *people* doing the implementing emphasized certain actions because of *place;* that is, they addressed their own school needs. All four districts discussed these types of undertakings, often noting the positive effects they were having in their districts. To illustrate, Acadia County adopted a program of professional development, with multiple teacher trainings, observations, and follow-up feedback sessions. Cedric County administrators discussed targeting special education students; bringing in an administrator who had extensive experience with data; and training teachers using a particular instructional model. David County revamped their local assessments, involving vertical (multi grade-level) teams of middle and high school instructional staff. Blue Knob County leaders expressed the most extensive list of local initiatives, which they believed addressed school and community issues, including a Pre-K

program; a comprehensive, K-12 literacy intervention program adopted for below grade-level readers; a push to improve school culture; community mentoring and tutoring; and behavioral assessments for struggling students. Finding 3 showed the participants in this study trying to create pathways to effective implementation through a combination of following regulatory steps and addressing their own challenges.

Summary: Finding 2 posits that district and school administrators in this study found or created pathways to implementing Regulation 310 through collaboration and support of one another and of teachers. Even so, they were also frustrated by the difficulties that these required actions put on teachers, as leaders worked to support and retain their teachers. In exploring what actions people take to implement this policy at their own local level, Finding 3 states that leaders are predictably following the rules but also extending various strategies. They are, in short, doing what Regulation 310 tells them to do, but also going beyond a scripted set of steps into adapted strategies they believe will raise student achievement. In diagnosing what those strategies should be, local administrators are taking place into account, which connects to the study's final finding.

Finding 4: Places. The final sub-question addressed the issue of context, and Finding 4 captures a response. This finding purports that district and school leaders believe their own contexts to be of extreme importance, but that context is not factored into VDOE implementation plans. Explained in this finding are the components of context as applied to instructional needs, beliefs about non-instructional contextual issues, and dissatisfaction with policymakers' regard for context.

Research Sub-questions on places

How do contextual elements of a district or school affect the implementation of this regulation?

Finding 4

Study participants unanimously regarded their own local factors as essential considerations when trying to implement policy. This regard for context affected implementation by causing administrators to look for adaptations of implementation elements to meet their own needs. Context produced an obstacle, however, when frustrated administrators believed VDOE did not account for their schools' needs and characteristics in Regulation 310.

Context as it applies to instructional needs. As described in Finding 3, participant interviews and documents show a strong tendency for districts to mold Regulation 310 to fit the instructional needs of their schools. Context in this sense means that leaders reflected on particular teaching and learning factors. Extending the illustrations noted in Finding 3, schools put certain actions into their school plans, adopted intervention programs for the area of lowest student achievement, or included specific personnel in implementing Regulation 310. The adoption of a particular professional development model in Acadia County is one example of an action in response contextual needs, with their school improvement plans stating, "a unified Teaching Framework is needed to provide instructional continuity school wide." Similarly, Blue Knob schools pushed for a literacy intervention when they realized the high number of students who were two or

more grade levels behind in reading. David County discussed the strong involvement of

their district-wide mathematics specialist in working with teachers, because math was the

content area that showed the lowest test results. Data showed that leaders attempted to

address context through a process of adapting components of Regulation 310 to meet

identified instructional problems.

     Beliefs regarding non-instructional contextual issues. Beyond instructionally-

based actions taken to address problems in their schools, this finding points to other

elements of context, as well. When responding to the interview question, "Did context

matter in your implementation?" each district participant and the VDOE official agreed that

the unique factors in a school, district, and community play a role in their ability to

effectively implement Regulation 310. Examples of such contextual factors were small size

of the district, community challenges, and district history.

     Small size. All four of the districts in this study were relatively small, all with fewer

than six schools in their divisions. The challenge, interviewees believed, is that with a

correspondingly small central office staff, the burden of implementing a policy such as

Regulation 310 falls on very few people who "wear many hats" as several respondents

noted. Not only must the central office staff multi-task, but principals often shoulder more

responsibilities, which in large districts might be assigned to district-level instructional

coaches, directors, or specialists. While each of the district and school participants made

note of size as an element of context, not all saw small size as entirely negative. One

superintendent expressed the mixture of benefits and costs in this way:

     Because we're small, I can come up with an idea in the morning and implement it by

     the afternoon. You can't do that in a large school system. Cruise liners do not turn on

a dime. …The flip side to that is there is a tremendous amount of resources that can

be benefited from in a large school system. You can have an honest-to-goodness

support team that can help in a larger school system; but in a small school system,

you've got the players that you've got. When one person is absent, you have to

question whether or not you can even hold a meeting because everybody is critical.

More participants, however, saw small size as a liability, as one principal remarked,

"Because it's a small county, a lot more is on us. In a bigger county you have this team that

can write your curriculum guides, and can do this or that."

Community factors. Three of the four districts also raised concerns around

community factors, including poverty, parent involvement, and public perceptions of

schools. Acadia and Blue Knob stressed the low-income level of their students' families and

lack of parent involvement as considerations in their decision-making when implementing

policy. In both of these cases, leaders were hesitant to use poverty as an excuse for low

student achievement, yet their comments revealed how poverty does factor into their

sensemaking about the work they are doing in their schools. A central office administrator

framed the obstacle of poverty, saying, "When that child's hungry why does he care about

this test that he has to take?" A principal remarked:

Then the fact that we're a high-poverty school …we're pushing 78% free and

reduced lunch, and I know that our needs are greater than other schools. So we do

have to work harder. I think those things need to be taken into consideration.

Honestly, I sit here and I think we have great teachers that work really hard. If I

were to take these teachers and pop them into a school in the suburbs that is

affluent, we would not have a problem passing these tests.

A Cedric administrator discussed how the public perceived "there are two different sides to the county," with one more privileged than the other. Children from different elementary schools come together when they reach her school, and this perception of inequality results in a belief on the part of some parents that the school will not serve their children's needs. She claimed she and her staff must work harder to gain the confidence of the community.

History of the district. Another prevalent theme around context was the district's history, often framed around past poor leadership or low student achievement that current administrators were now struggling to address. All districts made some reference to their historical challenges, with one noting, "We had come from what I would consider extremely poor leadership. We had a principal that did not understand the curriculum or how to lead, with antiquated ides about running a school. [And that showed up] in the SOL pass rates." Another discussed rebuilding trust after a blameful administration left, saying, "we're still breaking down the barriers … there's not a full trust yet between the teachers and administration." Finally, one district level leader was especially disturbed about poor management in prior years. She stated:

> When I came here three years ago this was an empty office, that was an empty file cabinet, nothing. There was no curriculum here. The three federal program grants hadn't been written … and they were due before I started working here. There was no teacher evaluation system; this division was a year behind in adopting the state evaluation system. Principals didn't know about their Title I requirements.

Historical context included how much progress had been made in SOL pass rates and whether a school made it to Fully Accredited, then regressed back again. Leaders often

commented on how their schools had improved in certain content areas, regardless of whether those improved pass rates met the state benchmark.

Dissatisfaction about policymakers' regard for context. Implementers' fervent belief that context inevitably affects numerous aspects of the work of improving their schools was compounded by an equally strong belief that context does not matter enough to policy officials. This combination generated an obstacle in the implementation of Regulation 310.

Respondents were unwavering in their perception that VDOE takes an inflexible approach to the requirements of Regulation 310. One superintendent described his objections in this way:

> To me it's a broad brush approach that's not specific to individual school needs. There's no differentiation… Instead of saying, "okay, analyze the data from your school … if you're having difficulty meeting the needs of children with disabilities, we're going to [help you] focus improvement efforts on that." Rather, they say, "you're in this geographic location, so this is the session you must attend."

Other leaders agreed, stating the policy is not "individualized enough" and that they must comply with steps that may or may not meet their needs. One principal remarked:

> It could be that there is something in a different area that you as a principal know could use a lot of attention. You might be stuck somewhere else because you're not fulfilling [that, for VDOE]. For instance, we spent a lot of time writing curriculum guides and that was purposeful, but there could be other things causing the school to not reach accreditation. There really is not a whole lot of leeway to that process. I

don't know that there's input from the principal as to what they think might be the

problem. I don't think there is at all, come to think of it.

Another stated, in reference to whether VDOE considers context, "I wish it mattered more. I

think from the state's perspective it doesn't matter, and that's perhaps what's

disheartening."

The researcher attempted to validate or refute this belief by exploring it at the VDOE

level. The VDOE participant relayed an understanding about districts' contexts and an

empathetic tone when discussing schools' challenges. The VDOE participant noted size,

capacity, and areas of weakness as specific to schools and verified that VDOE does indeed

see schools that can improve student achievement much more quickly than others. The

VDOE official also expressed ways in which Regulation 310 might be interpreted as

responsive to a school's context. However, VDOE documents provide little evidence to

confirm the claim that policymakers regard context in Regulation 310's tenets. An outdated

document, still posted on the VDOE website, refers to "differentiated technical assistance

provided by [the Office of School Improvement.]" But the corresponding links and

documents have virtually nothing to support that VDOE actually categorizes and assists

faltering districts according to their specifically defined needs.

Summary. All districts in this study consider place as vital to implementing

Regulation 310, with contextual factors ranging from instructional needs to community and

past issues of their schools. But district and school level leaders perceive that context does

not matter in Regulation 310, basing this belief on policy components such as standard

trainings for every Partially Accredited school, regardless of specific needs. Policymakers

claim to understand the importance of context, but they have not transformed that

understanding into actions that convince district and school leaders. The contrast of district emphasis on context with a perceived disregard on the part of VDOE to factor in individual school needs created an obstacle to implementation.

Discussion of the Findings

The findings from this capstone reflect the stories of four Virginia school districts working to implement Regulation 310. The findings describe pathways and obstacles to implementation, highlighting ways in which implementers benefited from or were challenged by mandates when their schools were labeled Partially Accredited. The study confirms several themes found in literature on educational policy. This section includes a justification of why studying local policy implementation is important and a discussion of how the pathway and obstacle findings connect to existing research.

Significance of studying local implementation. Literature supports engaging in research that uncovers details about policy implementation in specific local settings (Darling-Hammond, 1990; Datnow, 2006; Honig, 2006). The findings of this study contribute to important implementation research in two ways.

Firstly, findings are significant to implementation research because experts insist policy implementation must be viewed through practice so that leaders and policymakers may better understand local variability in implementation (Heimans, 2012; McLaughlin, 1991). Literature consistently confirms the theory that school-based implementers have considerable power to make policy into whatever series of actions, strategies, and efforts they determine it should be (Berman, 1978; Coburn, 2005; Cohen & Ball, 1990; Darling-Hammond, 1990; McLaughlin, 1987). In this capstone, the exploration of such actions, strategies, and efforts revealed how implementers dealt with Regulation 310 in their four

districts. This glimpse into the "black box" (Darling-Hammond, 1990, p. 340) of

implementation is valuable for what it teaches leaders and policymakers about schools'

enactment of policy.

Secondly, experts posit that analysis of implementation is necessary for better

discernment of outcomes and effectiveness, even if policy evaluation is not the goal (Cohen

& Ball, 1990; McDonnell & Elmore, 1987; McLaughlin, 1991; Odden, 1991c; Fullan, 2007).

This capstone did not purport to correlate implementation processes with outcomes. The

study was not an evaluation of the relative success or failure of Regulation 310, nor did it

try to determine if proper enactment would lead to higher accreditation ratings. Yet

specific cases of local policy implementation like this one may contribute to greater

understanding of school improvement outcomes in Virginia because "implementation is …

the *means* of accomplishing desired objectives" (Fullan, 2007, p. 85). Experts repeatedly

remind policymakers that implementation constitutes the vital link between what they

intended and what actually occurred (Berman, 1978; Cohen & Ball, 1990); in short,

"implementation dominates outcomes" (McLaughlin, 1991, p. 147). In sum, this capstone

contributed to local implementation research by revealing how selected schools implement

Regulation 310 and work to reach full accreditation, supplementing what is known and

understood about accountability policy in Virginia.

Pathway findings' connections to literature. Throughout the four broad findings

of this study, the researcher observed ways in which participants positively engaged in

implementation, and labeled these elements "pathways." Both actions and attitudes were

characterized as pathways when they appeared to result in helpful steps or optimistic

feelings on the part of implementers. Several of these pathways confirm theories put forth

in prior research, including mutual adaptation, professional development as a policy tool, co-construction, and the importance of trust and support.

   Mutual adaptation. A pathway seen in multiple findings occurred when district and school leaders adapted implementation steps for their own context and instructional needs. While they largely followed the policy's provisions, administrators also modified the regulation when they could to take actions they believed were necessary to account for the particulars of their schools. This supports the theory of mutual adaptation (Berman, 1978; Berman & McLaughlin, 1977). Berman described mutual adaptation as:

   [Implementation] plans were revised and modified according to conditions in the schools as well as to teachers' and students' characteristics, and the schools' standard operating procedures and classroom practices were changed to [align] better with project requirements … these adaptive processes consisted of many decisions made over time by many local actors. (p. 173-174)

Evidence of mutual adaptation appeared in several of the findings. In the areas of policy tools (Finding 1) and participant actions (Finding 3), some schools appeared to create their school improvement plans to fit their own needs or preferences, rather than adhering strictly to requirements, and VDOE appeared to allow this adaptation. For instance, language in Regulation 310 mandates that schools include at least nine specific elements, such as "a description of the amount of time in the school day devoted to instruction in the core academic areas" and "strategies to involve and assist parents in raising their child's academic performance" (Action requirements, 2015). Yet some VDOE-approved school improvement plans lacked these components. One principal noted that he asked for feedback on his submitted school improvement plan, but never received any, leading him

to wonder if anyone at VDOE had read it. But the fact that school improvement plans were

not rigidly rejected also may lend credibility to the idea that mutual adaptation is occurring

here, insomuch as state officials are allowing these local decisions. This disconnect –

between what VDOE appeared to require and what the schools documented in their

improvement plans – could be an area for further research, which will be discussed in the

final section of the capstone.

A similar idea reveals designs of implementation akin to bottom-up policy (Darling-

Hammond, 1990; Honig, 2004). Administrators in this study determined action steps they

believed would most effectively shape their implementation processes. In many instances,

official documents did not require such steps – for instance, adopting an early literacy plan,

hiring an outside consultant, or rewriting parts of their curriculum – but it begged the

question: Can these non-mandated actions be considered components of implementation?

Leaders reported these strategies to the researcher as integral parts of their compliance

with Regulation 310; in reality, some actions were often their own plans to improve their

schools, not responses to specific parts of the mandate.

Professional development. Another pathway to implementation appeared when

participants engaged in professional learning. Finding 1 outlined the tools that VDOE

utilized to implement Regulation 310 and the capacity-building instrument of professional

development for school leaders aligned with what earlier research purports: professional

development constitutes an effective instrument to enact policy (Chrispeels, 1997; Datnow,

2006; Marsh & Odden, 1991). Respondents consistently stated that professional learning

sessions on meaningful instructional practices (for example, on the topic of formative

assessment) built capacity in school leaders. Professional development also occurred for

some of the participants when they worked with and learned from their assigned VDOE

contractors, although this was not true for all implementers. As Chrispeels (1997) found,

leaders and teachers may continue to benefit from learning they gained while

implementing Regulation 310, even beyond the time and scope of this mandate, if the

professional development in which they engaged becomes a part of their own paradigm of

practice. Yet given participant's uneven experiences with VDOE, resentment about days

spend away from schools, and mixed perceptions of contractors, it is unclear whether the

professional learning gained in Regulation 310's implementation will indeed have a long-

term effect on participants' leadership and instructional practices. This may be an area for

additional research, as the final section explores.

Co-construction. An additional pathway that mirrored previous research can be

seen in Finding 2, which highlights the ways people engaged in the implementation of

Regulation 310 through teams of people from all levels of the hierarchy – VDOE, central

office, school leaders, and teachers. This bore a strong resemblance to Datnow's (2006)

theory of co-construction in implementation. Datnow remarked, "policy implementation is

a system-wide activity, even when the desired change is mainly at the school level" (p. 119)

and posited that multiple levels in a school district must be involved. This case study

supported the co-construction theory when leadership teams that included central office,

school leaders, and teachers met to track school improvement. Principals relied heavily on

the engagement of teacher-leaders in their schools. Moreover, VDOE personnel stayed

involved, providing technical trainings, visiting schools, and meeting with central office

personnel. All levels of the policy chain co-constructed (Datnow, 2006) implementation

strategies in these districts.

Trust and support. A final example of a pathway's link to literature lies in the complex role that trust and support played in the implementation of Regulation 310 in these districts. This pathway was observed multiple times by the researcher, and appears to confirm the research finding that implementing agents must feel supported by and trustful of their leaders and one another during policy initiatives (McLaughlin, 1987; Smylie & Evans, 2006). Smylie and Evans (2006) described trust in schools as "confidence in the reliability and integrity of individuals and their social relations" (p. 190) and further suggested that trust heavily influences behavior during policy implementation. One way in which the factor of trust appeared was when principals praised people in levels both above and below them. They appreciated being able to confer with their superintendents, and they valued the efforts of their hard-working teachers. Data consistently showed that trust, support, and shared goals motivated participants as they addressed school improvement and Regulation 310. The final section's recommendations for implementers – resulting from this study's findings – will further address the issue of trust.

Furthermore, targeted support of teachers by central office and building leaders has been found a necessary condition for new initiatives (Darling-Hammond, 1990; McLaughlin, 1991). McLaughlin (1991) remarked that teachers "did not put forth the effort necessary for successful implementation" if they did not believe their administration was supporting them (p. 145). The theme of direct support for teachers emerged as a pathway in these four districts, not only in the form of praise, but also in how principals approached the task of getting teachers to adopt changes. McLaughlin (1991) reminded policy makers that implementation often rests on the smallest unit – that is, the teachers. Consequently, how teachers were convinced to implement some course of action – especially a new

practice in their classrooms – posed a critical challenge. This study found that a key element in this regard may have been principals' self-reported "selling" of implementation steps to their teachers. All six principals in this study stated that they encouraged teachers to try out the newest instructional practice, rather than simply forcing them to comply. Leaders at both district and school levels conveyed other avenues of support, such as involving teachers in implementation decisions, allowing teacher autonomy when possible, and engaging alongside their teaching staff to modify curriculum or complete other implementation tasks. These strategies align with research that says teachers must feel protected to attempt an innovation or reform activity (Bryk et al., 2010). Bryk et al. also found that when teachers understood why they were carrying out a new initiative and had been afforded quality professional development to build their capacity to do so, reform efforts were more successful. Furthermore, literature tells principals to pay attention to building "a collective sense of purpose" (Bryk et al., 2010, p. 134) to obtain buy in from teachers. For instance, a chance to revisit the school's shared vision should accompany staff development activities; that is, these professional learning opportunities should extend beyond solely technical activities to ones in which teachers renew their sense of purpose around new teaching strategies they are being asked to employ.

Obstacle findings' connections to literature. The study's findings highlighted instances when districts faced obstacles with Regulation 310; and, like the pathways, connections can be made between these obstacles and prior research on implementation. In exploring elements that participants conveyed as being difficult to navigate, the researcher found strong links to literature on implementers' sensemaking, context, and motivation. Sensemaking draws upon policy signals and individual cognitive factors

(Spillane et al., 2002). As people make sense of a policy, they weigh their own contextual factors as heavy influences for implementation (DeMatthews & Mawhinney, 2013; Fuhrman, Clune, & Elmore, 1988; Spillane et al., 2002). Experts say there can be a resulting lack of motivation to support implementation, when participants do not value or understand new mandates (Darling-Hammond, 1990; McLaughlin, 1987; Odden, 1991c; Spillane et al., 2002). These ideas from literature can be linked to the findings about obstacles, as discussed in this section.

 Sensemaking. Individual sensemaking occurs as people negotiate policy and often results in implementing agents understanding and enacting policy components in ways that are different from what policymakers intended (Darling-Hammond, 1990; Spillane et al., 2002; McLaughlin, 2006). Policy messages and elements contribute to the sensemaking process (Spillane et al., 2002). Evidence of sensemaking could be seen in obstacles uncovered in this study.

 A lack of clarity from policy components was apparent in the frustration implementers felt in discussing goals and tools of Regulation 310. Leaders conveyed grave concerns that policy goals were only about test scores or compliance. Their concerns contrasted with the VDOE participant's response on goals: "the goal is always to improve student achievement and do what's best for kids in doing that." District and school leaders answered the goals interview question with remarks such as, "from the state's perspective it may only be that the scores aren't passing so the school division needs to work on that." Policy messages around goals seem unclear and could be subject to the influence of implementers' prior knowledge (Spillane et al., 2002). Virginia has been enforcing mandates around high stakes testing and accountability since the 1980s. Despite what the

Board of Education and VDOE may be espousing as policy goals – improving instruction,

helping children, or assisting schools – the considerable history of test score pressure may

be distorting policy messages in individuals' sensemaking.

Another obstacle was the required use of policy tools such as Academic Review and

contractors, which participants believed were ineffective. Regulation 310 utilizes a mixture

of mandates, inducements, and capacity-building instruments (McDonnell & Elmore, 1987).

Academic Review was an example of a tool that participants viewed as a mandate – they

had to do it – and most reported little or no value. Several principals reported being pushed

to focus on lesson plans after their reviews, but believed this practice would not improve

teaching and learning. Feelings about the value of assigned contractors varied, with several

participants stating that this tool was not helpful to them. Not surprisingly, VDOE did not

describe policy tools in the same way. Implementers, however, are making sense of

Regulation 310 components from the messages they receive and their own cognitive frame

(Spillane et al., 2002). It is essential that policymakers convey and communicate

regulations clearly if they want implementers to have an accurate and meaningful

understanding of policy elements (Darling-Hammond, 1990; Spillane et al., 2002;

McLaughlin, 2006).

Context. Participants also conveyed considerable discouragement about contextual

factors they faced in implementation of Regulation 310. Experts agree that context matters

in implementation of policies (DeMatthews & Mawhinney, 2013; Fuhrman et al., 1988;

Spillane et al., 2002) yet implementers consistently reported that there were issues in their

particular schools that complicated implementation but which were not recognized by

VDOE. Contextual factors that implementers believed to be obstacles included community

poverty, the smallness of their district, a history of problems under previous administrations, and specific instructional challenges. Some districts also added teacher stress and attrition as difficulties they faced. When their contextual problems were compounded by the perception that VDOE does not account for a school's context, frustration grew deeper. Findings pointing to the challenges of context confirm earlier research that claimed "district context appears not only important but paramount" (Fuhrman et al., 1988, p. 217).

Motivation. Literature also warns that a lack of will to enact new policies may emerge when the frustration, negative perceptions, and discouragement mount during implementation (Darling-Hammond, 1990; McLaughlin, 1987; Odden, 1991c; Spillane et al., 2002). Clearly principals recognized this when they worked to support their teachers and gain buy-in for new initiatives, as was noted previously in the discussion of pathways. Yet motivation goes beyond the initial marketing of a new idea to the will needed to sustain attention and effort to the long haul of school improvement (Fullan, 2007; McLaughlin, 1987). McLaughlin (1987) puts motivation or will in the list of essential elements of implementation and notes the challenges around it, stating:

> We have learned that policy success depends critically on two broad factors: local capacity and will. Capacity… is something policy can address… But the will, or the attitudes, motivation, and beliefs that underlie an implementers' response to a policy's goals or strategies is less amenable to policy intervention. (p. 187)

The obstacles emerging from data in this study point to implementers' losing motivation as they tried to enact Regulation 310. Sometimes this showed up as negative feelings – scorn for VDOE monitoring, disappointment that leaders did not receive more help, or overload

from implementing school improvement mandates. Sometimes lack of will surfaced as defiance, with one principal reporting:

> [VDOE] told us that we needed to use this different form of a lesson plan … [which] included these 100 things in them. I told my teachers, "I'm not going to make you do that. We're going to do the [real] work that we need to do."

The actions and reactions to Regulation 310 reflected diminishing motivation on the part of implementers – and led to an obstacle – supporting what experts describe as the essential role of motivation or will in implementation (McLaughlin, 1987; Odden, 1991c; Spillane et al., 2002).

Summary

Data analysis and interpretation led to four main findings from this capstone's multiple cases. Leaders encountered pathways and obstacles in their districts and schools as they worked to implement one part of accountability policy in Virginia – Regulation 310. After describing the districts' stories, the researcher presented the findings – connected to the research questions and the domains of policy, people, and places in implementation. Finding 1 conveyed the pathways and obstacles implementers encountered with the policy itself. Findings 2 and 3 highlighted the collaborative work of participants from all levels, who enabled implementation by supporting one another as they took required and strategic actions. Finding 4 concluded that implementers took context heavily into account as they navigated Regulation 310 and were frustrated by their perceptions that policy officials did not share the same view that context matters in implementation. The findings confirmed several themes from the research literature, including mutual adaptation, professional development as an effective policy tool, co-construction, trust and support in

implementation, sensemaking, the role of context, and implementers' motivation (Berman,

1978; Darling-Hammond, 1990; Datnow, 2006; DeMatthews & Mawhinney, 2013;

Chrispeels, 1997; Fullan, 2007; McLaughlin, 1991;Odden, 1991c; Smylie & Evans, 2006;

Spillane et al., 2002). Studies such as this help policymakers and educational leaders gain a

better understanding of implementation at the local level (Darling-Hammond, 1990; Honig,

2006). As the final section will explain, this study's findings have implications for

practitioners seeking to improve policy implementation at a time when many are taking a

close look at accountability policies.

Section Five: Conclusions and Implications

This capstone explored the challenge of policy implementation for Partially

Accredited schools enacting regulation 8VAC20-131-310 in four Virginia school districts. In

addressing the primary research question – How are school districts implementing

Virginia's regulation for schools labeled Partially Accredited? – the researcher used a

qualitative, multiple-case study methodology. She collected interview and document data

from the Virginia Department of Education and the participating districts. Two theories

provided the conceptual framework for the study: the domains of policy, people, and places

in implementation (Honig, 2006) and the levels of the policy chain (Berman, 1978).

Findings revealed pathways and obstacles experienced by participants when implementing

Regulation 310. These findings confirmed several theories in the existing literature on

policy implementation in educational contexts. This section concludes the capstone, with

implications for practitioners, recommendations for further research, and final remarks on

the current landscape of accountability policy. Following this conclusion, the researcher

presents two action communication products intended to assist in facilitating the

recommendations suggested here.

Implications for Practitioners

The findings from this study lead to implications and recommendations for

practitioners, particularly those working in the four participating school districts and at the

state level. While the findings are not generalizable beyond the sites included in this study,

leaders in similar settings who are attempting to implement Regulation 310 or other

similar policies may also see value in the findings and recommendations. The implications

and recommendations offered below are based on the study's four major findings and are

presented according to the domains of the policy chain, which provides a constructive means for considering how the levels of the hierarchy – policy officials, district leaders, and school principals – experience implementation, and what might be done to resolve challenges at each level of authority.

Policy officials. Those at the highest level of policy implementation, VDOE in this case, should work to articulate components of Regulation 310 in the clearest possible terms. This means stating and restating meaningful goals, explaining steps of compliance, and communicating an understanding of district challenges – especially regarding unique contextual issues.

District and school level participants in this study did not value a policy goal of one day's test scores, as Finding 1 suggested. If the real goal of Virginia's accountability policy is comprehensive school improvement, then VDOE would more effectively advance implementation work by communicating that message to Virginia districts. State officials have considered broadening the measurements that lead to accreditation (Virginia Department of Education, 2016); such a change in policy design could improve perceptions around Regulation 310. But policy tools must also be clear and meaningful. Improvements to policy instruments might include: retooling the Academic Review process; hiring only highly qualified contractors; and engaging with district and school partners on their unique challenges, so as to provide targeted assistance. Additionally, while implementers generally applauded the tool of professional development, sending all regional personnel to the same training sessions held far less appeal. VDOE may wish to consider offering a menu of differentiated professional learning options that align to instructional deficiencies at the Partially Accredited schools.

The concepts of trust and support – and their effects during implementation – also apply to agencies such as VDOE (Bryk et al., 2010; Fullan, 2007). Experts suggest the development of a relationship between implementing school leaders and external agents that promotes clear roles and deeper support channels. That is, VDOE may want to examine their assistance measures to insure that they extend beyond facilitating mere compliance (receiving required reports, holding meetings) to promoting meaningful communication, feedback, and assistance (Fullan, 2007).

District level leaders. As policy moves from policymakers and officials to the schools, district leaders such as superintendents, assistant superintendents, directors, and specialists have the power to mitigate some of the challenges posed by Regulation 310, and to provide support to their teachers and school leaders.

Despite their possible frustration at the goals set by policy officials, district leaders may be able to shape implementation around goals that come from a shared vision for school improvement at their local levels. Superintendents who facilitate a sense of urgency around meaningful improvement goals – such as more engaging instruction; growth in student levels of mathematics or reading achievement; or better use of instructional time – may find that leaders and teachers positively engage in implementation despite the state's mandate of certain pass rates on the Standards of Learning tests (Fullan, 2007). Likewise, district staff should work to make the tools of Regulation 310 as clear and accessible as possible. District leaders might petition VDOE to include more administrators in Academic Review meetings and professional development sessions, request that the same contractor remains throughout implementation, or assist with school improvement plans. In their

advocacy to state officials – for policy clarity, meaningful goals, and differentiated trainings

– superintendents, especially, may be able to improve some of the pitfalls of Regulation 310

Superintendents and their staff must practice trust and support, too. Experts remind

leaders that supporting schools to innovate and try new practices in the course of school

improvement may mean allowing them space to do so (Bryk et al., 2010; Elmore, 2000).

Elmore (2000) tells leaders to guide and direct those lower on the chain than they are,

since "one does not control improvement processes … since most of the knowledge

required for improvement must inevitably reside in the people who deliver instruction, not

in the people who manage them" (p. 14). In some instances in this study, superintendents

seemed to be applying this hands-off, empowering approach; and principals reported

appreciation for that trust in them. Although district level leaders may need to provide the

resources and avenues for principals and teachers to learn the technical aspects of school

improvement, superintendents should do so with a goal of empowering and trusting school

personnel.

Finally, superintendents and other central office leaders are links in the policy chain

and their participation in the activities of school improvement is vital, as noted in Finding

2. In the contextual considerations detailed in Findings 3 and 4, superintendents should

also heed their own advice to VDOE: Be aware of your schools' varied contexts and allow

for differences in implementation steps throughout the district, as appropriate. The

researcher highlights this recommendation based upon some of the language from

participants that appeared to, on one hand, plead to VDOE to consider context, yet on the

other, apply all of the same rules of Regulation 310 to all of their schools regardless of their

respective levels of student achievement. One of the interviewees noted that once leaders

had determined a course of action in implementation for their worst performing school, they told staff, "what's good for one is good for all." That reasoning did not appear to be taking into account differences in the schools and their relative strengths or weaknesses. If context matters, it should matter as much to superintendents as to policymakers.

School principals. Principals and assistant principals directly facilitate implementation of Regulation 310 in their schools. These leaders deserve clear policy messages from state officials and a high level of support and trust from their superintendents, as was previously mentioned. But building leaders also bear responsibility during policy implementation to make the process as meaningful as possible for teachers, given that principals sit at a higher level of authority than teachers. Findings from this study illuminate some of the steps school leaders might take to improve implementation.

In a similar manner to the recommendation that district leaders help craft more meaningful goals, principals, too, have the power to help teachers view Regulation 310 as part of a larger culture of school improvement. Principals may be able to use some of the policy instruments to shape such a culture. Contractors might be further utilized to work with teachers; and school improvement plans can be designed to include strategies that teachers find beneficial in their day-to-day classroom practices. This study's Finding 2 recommends that principals continue to co-construct implementation with personnel at other levels; it is valuable to involve central office staff, grade level leaders or department chairs, and teachers in the processes of implementing policy. Furthermore, school leaders must also consider context. As suggested to superintendents, principals may find that forcing every teacher to adopt a practice that stems from Regulation 310 breeds

resentment in teachers, akin to what leaders feel when VDOE disregards context. If a strategy is necessary for just the math teachers, or just the 7th grade, why must everyone employ it? Principals should carefully assess these decisions, since some tenets of improvement are indeed beneficial to an entire school. But principals should deliberately and thoughtfully apply implementation steps in the necessary places. Teachers, too, want their own unique classroom contexts considered.

Data clearly showed principals seeking buy-in from teachers, as was explained in the prior section. But how is that accomplished? Experts suggest some ways teachers can be successfully convinced to positively engage in the work of school improvement. Firstly, teachers must fully understand the policy's intent and its strategies (McLaughlin, 2006); thus principals are reminded to clearly convey goals and action steps to their staffs. Secondly, effective professional development for teachers is a necessary condition for changed practice (Bryk et al., 2010; Fullan, 2007; Odden, 1991c) and principals hold some of the power to create such learning experiences. Thirdly, Bryk et al. (2010) asserted "the technical activities of school improvement rest on a social base" (p. 204). In other words – and as noted in recommendations for VDOE and superintendents – trusting teachers is essential. Scholars say that teaching is improved through collaborative work with others – both teacher-colleagues and school administrators – thus creating the culture for such collaboration is important work for principals (Bryk et al., 2010; Elmore, 2000; Fullan, 2007). Principals who facilitate frequent teacher observations of one another, cooperation in curriculum development, and collaborative conversations about teacher practice and the school's "collective sense of purpose" (Bryk et al., 2010) may find that the buy-in they are seeking comes about more readily (Fullan, 2007).

Recommendations for Further Research

Several aspects of this study point to additional research that may further enhance understanding of the implementation of Regulation 310. The researcher specifically suggests three such areas: the adaptations of policy that took place during Regulation 310's implementation; the perceptions and effects of the policy's professional learning strategies; and the observations of teachers regarding implementation.

Data suggest that, as implementers dealt with Regulation 310, considerable mutual adaption occurred. An area for further research may be why this was happening, the motivation of participants in practicing policy adaptation, and greater details of exact policy components. As was previously explained in the discussion of the findings section, schools drafted improvement plans that did not precisely meet written requirements of Regulation 310; and implementers included actions that likewise did not appear to align with policy components. Further study of this dynamic may uncover why a gap existed between what the regulation stated and what VDOE ultimately accepted from school districts. One may surmise that VDOE is acting intentionally in this regard – that is, "street-level bureaucrats" are allowing for mutual adaptation, since these implementers possess their own perceptions and motivations about Regulation 310 (Weatherley & Lipsky, 1977), and may think it is beneficial to bend policy elements. Another possibility, however, is that VDOE lacks the capacity or expertise to carry out stricter compliance with Regulation 310. Several district and school interviewees proposed this theory, with one principal remarking, "my personal opinion is that [VDOE] has become so overwhelmed; because there are so many schools [in improvement status] that they don't have enough resources, money, contractors, and whatever in their department to even monitor all the schools." The

data in this capstone were insufficient to confirm or refute such notions, but further study may lead to firmer conclusions on VDOE's capacity and motivation, and on why certain parts of implementing Regulation 310 vary from policy text.

Another area for future research centers on the professional development component of Regulation 310's implementation. Some participants conveyed satisfaction regarding the professional learning VDOE provided to Partially Accredited school leaders; others found it too time consuming or not sufficiently tailored to their needs and deficiencies. A deeper study of professional learning opportunities associated with Regulation 310 may help identify the most helpful types and modalities for professional development. For example, at least one principal found her contractor beneficial and relayed that performing observations together – including the activity of examining inter-rater reliability of teacher observations – provided her certain insights that she could not have gained through a professional development group session. Others liked one-day seminars on topics such as formative assessments. Further study could explore participant perceptions about this policy's current professional development offerings; and it could also provide a longitudinal look at whether practitioners continued to employ new learning beyond the scope of Regulation 310 implementation (Chrispeels, 1997).

Lastly, this study did not directly involve the final link of the policy chain – teachers. The capstone's purpose of exploring how policy implementation unfolded in specific contexts led to a focus on leaders' actions and perceptions. Principals often reported their teachers' feelings, beliefs, and actions in interview question responses. On some issues, however, it would be important to reveal more direct teacher reactions. For example, the issue of trust surfaced throughout this study and wove through the policy chain levels:

principals wanted to be able to trust their superiors, while superintendents wanted to feel

more trust and respect for VDOE leaders. But the question of whether teachers trusted

their school leaders – principals, assistant principals, and department or grade-level chairs

– was not addressed. This could be a crucial aspect to deeper understanding of the effect of

social capital (Smylie & Evans, 2006; Bryk et al., 2010) in the implementation of Regulation

310.

Final Remarks

As this capstone came to a close, annual accreditation ratings were being announced

in Virginia. The schools in the study, along with hundreds more, learned whether they were

to be labeled Fully Accredited, Partially Accredited, or Denied Accreditation. If schools

labeled Partially Accredited move to Fully Accredited, they are no longer subject to the

mandates in Regulation 310. If not, implementation continues.

Although this study explored local implementation around a single regulation in just

one state, it is tied to a greater body of accountability policy work – with emerging new

developments. At a national level, Congress recently passed the Every Student Succeeds Act

or ESSA (U.S. Department of Education, 2015), effectively replacing the powerful No Child

Left Behind legislation of 2002 (U.S. Department of Education, 2010), which emphasized

accountability through testing, measurement of student progress, and teacher quality. ESSA

promises to provide more flexibility to states and localities, with one official going so far as

to say that ESSA will, "unleash a flood of innovation and student achievement across

America, community by community, and state by state" (Layton, 2015). Virginia

policymakers are echoing a similar message about accountability policy. Superintendent of

Public Instruction Dr. Steven R. Staples recently remarked, "we want to drive all schools,

not just some schools … [to] continue to get better in areas where there may be underperformance" (Virginia Department of Education, 2016). Virginia has formed an SOL Innovation Committee to help reform testing and accountability.

But in this "flood of innovation," will policymakers pay ample attention to implementation at the local level? The type of research done in this capstone study is important in this wave of fresh accountability policies. Along with drafting new laws, officials must realize there are few "universal truths about implementation" (Honig, 2006, p. 20), rather, real people implementing particular policies in unique places. To accompany policy reform, scholars should continue to study implementation at the school and classroom levels (Darling-Hammond, 1990); and educational leaders would be wise to gain a deep understanding of the challenges for the implementers.

ACTION COMMUNICATION PRODUCT #1

A Guide to Implementation

Required Actions for Partially Accredited Schools • Regulation 8VAC20-131-310
From Regulations Establishing Standards for Accrediting Public Schools in Virginia

R A T I O N A L E

This guide is intended for use by schools and school districts that are subject to the mandates in Virginia's state accreditation code 8VAC20-131-310, as a result of being labeled "Partially Accredited." This regulation applies to all Partially Accredited schools, regardless of the specific rating within the Partially Accredited label: Approaching, Improving, or Warned.

Literature points to policy work in educational settings as being highly contingent upon the people involved, the nature of the policy, and the specific place in which policy implementation is occurring (Honig, 2006). Regulation 8VAC20-131-310 is part of a larger web of accreditation policy in the state of Virginia; and as such, depends upon those same domains of people, policy, and place if a school is to effectively implement its mandates or to reap its benefits.

The guide is meant to provide a structure for school and district leaders to plan action steps through that lens of people, policy, and place (or context). It encourages leaders to consider goals and steps carefully, map out key people who will be involved in implementation, and analyze contextual factors. It is not meant to supplant other important documents and meetings, usually from or with VDOE, that serve to inform and assist Partially Accredited schools. Rather, it supplements other sources of information surrounding accreditation.

In large part, this guide consists of lists of questions, and that is by design. Implementers can and do create their own data spreadsheets, school improvement plans, and templates for planning. What they may *not* always do is ask the right questions before diving into implementing a policy or regulation. *The questions posed in this guide are meant to generate a robust discussion, which should precede implementation and thereby prepare leaders for the process ahead.*

Users should not feel forced to employ this guide in a linear or restrictive fashion. Leaders or teams might consider, for instance, just Part Three – Contextual Factors – if they've not done so before. Or they may progress through the guide at the start of planning for implementation, but find they use various parts, omit parts, or differ the order. Each school leader knows her own school priorities; however, she may find a guidance document such as this to be beneficial as she leads others through implementation planning.

In summary, the guide has several potential purposes and benefits. It may help implementers to:

- Pre-plan for implementation by assessing current conditions at the school.
- Organize their thinking and understanding of required actions.
- Determine key people who must be involved in implementation.
- Define structures for participants' involvement (e.g., leadership teams; roles).
- Delineate exact steps mandated in the regulation.
- Consider school contextual elements that may make implementing changes or new strategies difficult or easy.
- Expand upon the regulation's scope, as deemed appropriate, by the school's leaders and key stakeholders.

Most importantly, as leaders journey through mandates such as this regulation and use this guide, they should craft tools that fit both policy requirements and their own needs. In the end, this mandate or any other must come to life in your own school community.

PART ONE: REGULATION COMPONENTS

Regulation 8VAC20-131-310 contains required actions for schools rated Partially Accredited. The goal of this regulation is for schools to become Fully Accredited. This happens when schools meet benchmark SOL pass rates and graduation rates of:

English	75%	Social Sciences/History	70%
Mathematics	70%	Science	70%
Graduation & Completion Index (high school level only)			85%

EXAMINE (data and factors)

On the way to reaching critical numbers of students achieving proficiency, it is necessary to assess where your school is, in terms of achievement data _and_ critical contextual factors, prior to creating goals. Thus, leaders should examine data from various sources.

   I.   Our school's SOL pass rate data:

English   ____
Mathematics   ____
Social Sciences/History   ____
Science   ____
Graduation & Completion Index   ____

   II.   What other data – quantitative or qualitative – show indicators that your team needs to consider in setting goals? (See part three of this guide for possible ways to determine such indicators.)

   Remember that factors could be barriers OR benefits (E.g., Number of new teachers = 20/80; our school just adopted a new mathematics textbook series that teachers are less familiar with; community poverty rate has continued to rise and is now 62%; we have a new reading coach who will co-teach with teachers daily.)

SET GOALS

Leaders are encouraged to use whatever goal-setting process works best for them. It is important to remember, however, that the "goal" of 75% of students passing Reading (or similar) feels like just a number to most educators. Factor in the data and the contextual and unique needs you considered in the examination stage, above, to craft meaningful goals around school improvement.

UNDERSTAND and PLAN (regulation components)

Implementation proceeds more smoothly when requirements are clearly understood and discussed with all participants from the start. Leaders are encouraged to acquaint themselves with the major parts of 8VAC20-131-310. They should also assign roles and responsibilities (further described in part two) and ask questions of VDOE prior to undertaking actions that may be vague or that leaders would like to modify.

The following are the four (4) main requirements to know about 8VAC20-131-310, with accompanying questions that leaders should ask and answer in order to thoroughly plan out your implementation steps.

1) Academic Review

   o Who will prepare for, schedule, and lead academic review?
   o Who will attend as our results are being presented to us?
        ✓ It is encouraged all key leaders (teacher-leaders included) be at this meeting!
   o Who will be our "notetaker" since VDOE allows a notetaker to capture comments shared at the meeting that may or may not be on the final written report?
   o How are we planning to address the deficiencies that are found? (Not a detailing of strategies, since the deficiencies are not yet known; rather, when/how will a team gather – and with whom included – to discuss what is found?)

2) Monitoring – includes work with a VDOE staff member or contractor; attendance at AARPE or other professional development session; and other possible actions/steps

   o Who will be the lead for communications – especially with VDOE – during monitoring steps?
   o Who will attend professional development sessions? Do we need to seek VDOE permissions to include our intended participants?

3) 3-Year School Improvement Plan

   o What team of people will draft the school improvement plan (SIP)?
   o Do we already have a SIP? Is it sufficient or are add-ons needed? How will this be determined?
   o Once the above questions are answered, plan out the meeting(s) and data needed to address the SIP creation or revision. Determine how follow-ups will be done to see if strategies in it are working.

4) Adoption of Intervention(s)

- o What team of people will determine interventions? Be sure to include all key stakeholders: school leaders, reading or math specialists, teachers, parents, and possibly students. (Remember that students and families are often affected by intervention programming. For example, might you pull a child out of an elective and into an intervention period for extra reading or math? If so, families should be consulted.)
- o Do we already have intervention programs or strategies in place? Are they working? What data supports your answer?
- o How and when will the decision to maintain current or adopt new interventions be made?

PART TWO: IMPLEMENTERS AND THEIR ROLES

Regulation 8VAC20-131-310 requires many active participants to implement steps, with teams engaging in the school improvement process. As teams are formed, it is vital to include all levels of authority. Below are some possible structures for implementation teams *Schools should choose what combination(s) will work for them.*

All Level Team	*District-based multi-level team (leadership only)*	*District-based multi-level team (with teachers)*	*School-based Leadership Team*	*School-based multi-level Team*
VDOE staff member or contractor Central office A Central office B Building-level leader A Building-level leader B Teacher-leader(s) Teacher(s)	Central office A Central office B Building-level leader A Building-level leader B	Central office A Central office B Building-level leader A Building-level leader B Teacher-leader(s) Teacher(s)	Building-level leader A Building-level leader B Teacher-leader(s)	VDOE staff member or contractor Building-level leader A Building-level leader B Teacher-leader(s) Teacher(s) Possible inclusion of Central office B

Definitions of team members:

VDOE staff or contractor – Staff who work directly for VDOE (Office of School Improvement, Department of Instruction, other) or are hired by VDOE as a contractor, to assist the school district

Central office A – High-level of authority individual (e.g., superintendent, assistant superintendent)

Central office B – Individual who serves all schools but can provide more ongoing support and/or tackle specific jobs (e.g., district-wide reading specialist, director of instruction)

Building-level leader A – School principal (strongly suggested he/she serves on the team)

Building-level leader B – Assistant principal or administrative designee (may serve on teams, along with the principal)

Teacher-leaders – Teachers who have responsibilities in addition to being in the classroom (e.g., department chairs, grade-level leads)

Teacher – Those teachers who are full-time in the classroom, not serving in leadership roles also

Responsibilities of Team Members

District and school leaders should determine clear areas of responsibilities as they progress through implementation. A productive way to decide on responsibilities is in Part One, in the Understand and Plan section. The major components of Regulation 310 are detailed there and people should be assigned tasks and areas of oversight.

Considering the following questions may provide another avenue to clarify roles and productively use the people in your school/district.

1) Who are the strongest leaders in our organization, with skills that suit implementation tasks?

2) Do we have potential leaders, who are being groomed for higher levels, who we should include in meaningful ways (e.g., an assistant principal who is likely to be promoted to a principalship; a teacher-leader working on entering administration)?

3) What department or grade level will need more support as we implement? (Areas with fewer experienced teachers, more resistors, or low student achievement, or similar)

4) How much time can our key team members realistically give to implementation tasks? (E.g., assistant principals also handle discipline – can they be pulled into meetings during the school day?)

5) How can we support principals, specifically, as leaders in school improvement work? This may mean getting them competent "substitute" principals (retirees?) when they attend VDOE trainings, central office meeting with resistant teachers, or other supports.

PART THREE: CONTEXTUAL FACTORS
MAKING IMPLEMENTATION WORK BY ASKING & ANSWERING CRITICAL QUESTIONS

Regulation 8VAC20-131-310 requires any Partially Accredited school to take certain steps. But schools are encouraged to implement actions in ways that work for their settings.

The following questions – posed to individuals or teams of implementers – may help to clarify areas that not all leaders and teachers fully understand; or they may serve to spark discussion on relevant issues. Choose any or all of these questions to encourage deeper thinking and conversation.

1. Being labeled Partially Accredited came from SOL pass rates or high school graduation rates that did not meet required benchmarks. What do *we* believe to be the root causes of our students' underachievement?
   a. Might we think our pass rates are better than viewed by this regulation? Why? If so, how do we frame the need for continual improvement (e.g.: "We would be satisfied with 2 point increases per year, even if that holds us at Partially Accredited.")

2. Schools subjected to policies often complain that one broad mandate applies to many districts, schools, and educators; and subsequently wish for a context-based approach to regulations. How are we taking our own contextual elements into consideration?
   a. For example, are we and should we apply the same instructional interventions in all of our schools and grade levels / departments? Have we set differentiated goals, based on both prior results and anticipated needs?

3. What does our "internal context" look like? What areas are seeing stronger areas of student achievement? Why might that be?

4. What does our "external context" look like? Are we experiencing more challenges due to our size, poverty rate, or other factors? If so, what might mitigate those challenges?

5. Now that we have discussed root causes of underachievement, differentiating our approach, and internal and external contexts, what specific "data" points does this generate? In other words, quantitatively and qualitatively list factors that will affect implementation. (E.g., Number of experienced reading teachers; adoption of a school-wide behavior plan; percentage of parent involvement; funding available for intervention materials, etc.)

6. What strategies come to mind as we consider context? How can we enact them?

ACTION COMMUNICATION PRODUCT #2

Communication with Policy Monitoring Officials

Letter to Dr. Steven R. Staples, Superintendent of Public Instruction – Virginia Department of Education

RATIONALE

The letter presented here is intended to inform officials at the Virginia Department of Education of this capstone study and the findings thereof. In communicating with Virginia's Superintendent of Public Instruction, the researcher conveys key discoveries regarding the implementation of Regulation 8VAC20-131-310 in the four districts studied. Leaders at VDOE or members of the Board of Education may benefit from: (1) learning of this study and the brief summary of recommendations for practitioners; and, (2) receiving a copy of Action Communication Product #1 – A Guide to Implementation.

Terri L. Perkins
Ed.D. Candidate in Educational Leadership and Policy
Curry School of Education • University of Virginia

November 8, 2016

Dr. Steven R. Staples
James Monroe Building, 101 N. 14th Street
Richmond, VA 23219

Dear Dr. Staples:

In my role as a doctoral student, I recently conducted a case study on the implementation of requirements for schools labeled Partially Accredited in Virginia. Specifically, this qualitative case study focused on four school districts implementing the required actions in Regulation 8VAC20-131-310. The capstone study was for my dissertation research at the University of Virginia, and included findings on the challenges reported by multiple educational leaders, as they worked to improve their struggling schools. I am writing to briefly report on these findings, a few recommendations based on the findings, and to share with you an action communication product created as a part of the work of this capstone. This product, a guide for implementation of required actions, is meant for school districts, but could also be beneficial for VDOE to examine, in its role as the monitoring agency of this regulation.

The findings of my study centered on elements which leaders in the four districts found to be effective when implementing required actions, as well as elements or instances they believed posed obstacles. The policy (regulation) itself, the interactions and actions of the implementers, and the contextual considerations all converged to challenge or support leaders and teachers. The following points summarize some of the study's findings:

- Participants perceived the goal of requirements to be a single assessment cycle's pass rates, and found this discouraging.

- Participants valued components such as professional development (in the AARPE sessions) and the opportunities to draft individualized improvement plans. Not all respondents found their assigned contractors (Outside Personnel) or their schools' Academic Reviews helpful.

- District and school staff benefited from collaborative, supportive leadership during improvement initiatives; and such collaboration included all levels of authority – VDOE, central office, and school leaders.

- Participants strongly believed that their own context matters greatly as they are working to implement requirements; but they worry that policy makers and monitoring agencies do not share this point of view.

From these findings, implications for practitioners at every level might be ascertained. Those at the highest level of policy implementation – VDOE or Virginia's Board of Education in the case of this regulation – may need to better articulate goals and requirements, in the clearest possible terms.

This may mean stating and restating meaningful goals, explaining steps of compliance, and communicating an understanding of district challenges – especially regarding unique contextual issues.

News that state officials have considered broadening the measurements that lead to accreditation has reached many leaders in school divisions. Such a change in policy design could improve perceptions around 8VAC20-131-310, since district and school level participants in this study did not value what they perceived as a policy goal of one day's test scores.

If the perceptions of the participants in this study were found to be true more widely, other improvements to policy instruments might be considered. Based on my data, these changes may include: retooling the Academic Review process; matching highly qualified contractors to schools (and allowing them to stay with these districts); and engaging with district and school partners on their unique challenges, so as to provide targeted assistance. Additionally, while implementers interviewed in this study generally applauded the tool of professional development, sending all regional personnel to the same training sessions held far less appeal. These leaders noted a desire for VDOE to consider offering a menu of differentiated professional learning options that align to instructional deficiencies at the various Partially Accredited schools.

Finally, I include as an attachment to this letter, a document entitled "Guide to Implementation: Required Actions for Partially Accredited Schools • Regulation 8VAC20-131-310." It is in no way meant to supplant materials already in existence to direct school districts. Rather, the guide is largely comprised of reflective questions and planning suggestions for schools that are labeled Partially Accredited, and thus supplements VDOE resources, for the schools that will be implementing requirements. If any part of this document might be helpful to your staff at VDOE, I offer it for your use. (I ask only that VDOE contact me if the document will be used – in full or in part – so that I know of its usefulness, as I would be eager for any feedback on my work.)

My study served as an enormously important learning experience for me – both as a school director and as a student of educational leadership. I hope you will find interest in what I have shared here, and that you would feel free to contact me should you have questions or comments on my work. I appreciate all that you and your staff do to shape public school education across the state of Virginia.

All the Best,

Terri L. Perkins
Ed.D. Candidate – University of Virginia
<email; phone contact>

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Table 1

Policy instruments

Instrument	Definition	Examples
Mandates	Rules and regulations imposed on the implementers or the policy targets (e.g., students)	Compulsory school attendance; graduation regulations
Inducements	Resources provided in order to motivate compliance	Title I grant funding
Capacity building tools	Tools that assist implementers in their enactment of policy	Teacher training to implement a new math or literacy program
System changing tools	Instruments that shift authority to another body, in order for the policy to be implemented	Vouchers or charter schools

Note: Policy instruments, their definitions, and examples of each type are adapted from

McDonnell and Elmore (1987). The authors drew upon research and theory to detail types

of tools, examine how they shape policy, discuss assumptions embedded within certain

instruments, and make distinctions across various tools.

Table 2

Participants with criteria and rationale for inclusion

Group	Number	Rationale for inclusion	Criteria for inclusion	Data source
VDOE staff member	**1**	Provided information on state perspective	Availability and level of leadership	Interview and provided documents
Leaders from central office	**5** (1 from each of three districts; 2 from one district)	Provided in-depth descriptions from the district leadership perspective	Availability, level of leadership, and involvement in implementation Roles: 2 Superintendents; 1 Assistant Superintendent; 2 Coordinators / Directors of Instruction	Interviews and provided district-level documents
School principals	**6** (2 from each of two districts; 1 from each of two districts)	Provided in-depth descriptions from the school leadership perspective	Availability, level of leadership, and involvement in implementation at schools that labeled Partially Accredited Roles: 1 high school principal; 3 middle school principals; 2 elementary principals	Interviews and provided school-level documents

Note: Participants came from four school districts and the Virginia Department of

Education. Consenting school districts were asked to allow the researcher to interview

both district level and school level leaders.

Table 3

Data collection and analysis activities timeframe

Activity	Timeframe
IRB approval granted	March 2016
Contacted district leaders by email to solicit permission to be a participant in the study	March – April 2016
Obtained consent forms from participants upon agreeing to be interviewed; and scheduled interviews	March – April 2016
Conducted (1) VDOE staff member interview, collected VDOE documents	April 2016
Conducted semi-structured interviews with central office leaders and principals in the four districts	April – June 2016
Collected district and school documents such as school improvement plans, monitoring documents, templates	April – June 2016
Transcribed all interviews and began coding	April – June 2016
Performed coding in two cycles; drafted analytical memos; analyzed data from all sources	May – July 2016

Note: Overlap in data collection and analysis activities was due in large part to the timing of

districts consenting to be included and participants' availability for interviewing.
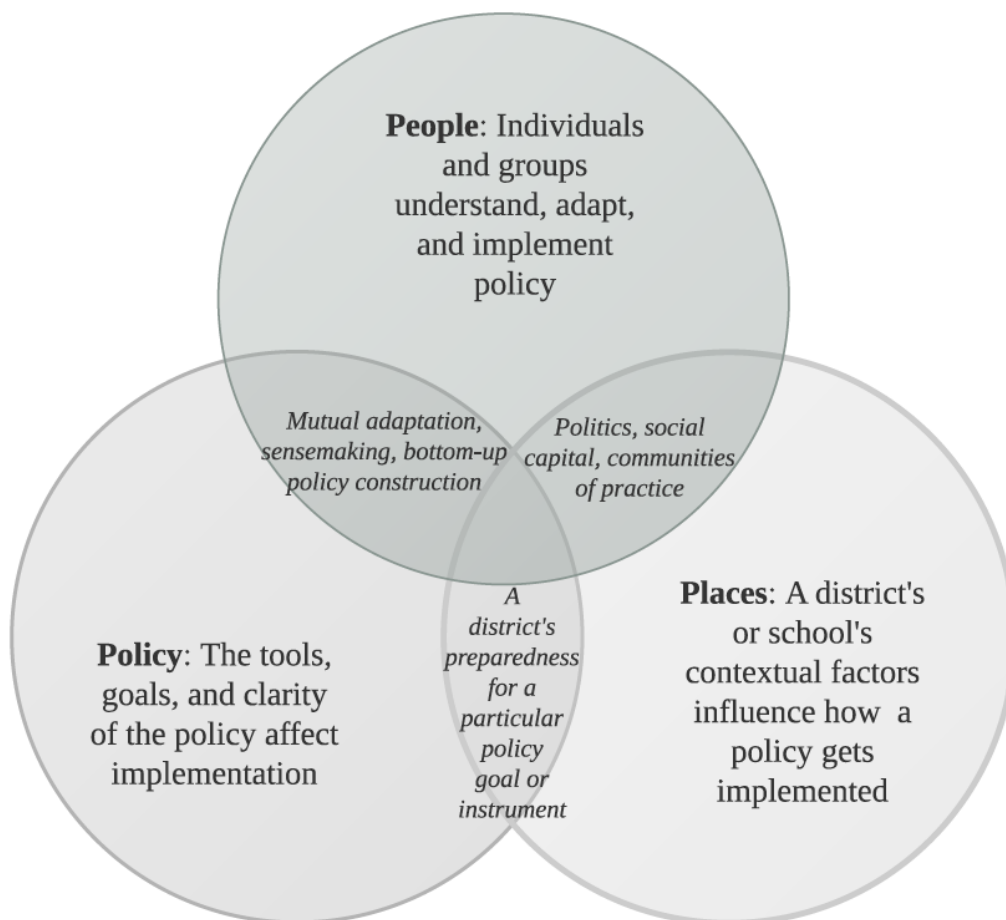
Figure 1. Intersections of people, places, and policy in implementation research (Honig, 2006). Honig conceptualized components of educational policy as overlapping, dependent domains, which drive implementation at the local level. Specific theories are listed as illustrations of studies that fall into intersections of the domains. For instance, mutual adaptation involves *people* who make decisions about adapting the *policy* stipulations.

PEOPLE

Include:
- Formal policy targets
- Those not formally named as targets
- Subgroups within formal professional categories
- Communities and other associations
- Policy makers as key implementers

POLICIES   PLACES

Dimensions include:
- Goals
- Targets
- Tools

Vary by:
- Focal organization, agency, or jurisdiction
- Historical/institutional context
- Cross-system interdependencies

Figure 2. Honig's (2006) domains of contemporary education policy implementation. Each of Honig's domains include various people, entities, and components. The elements or players defining each domain become the focal point for exploring how implementation occurs. For instance, to understand the *policy* being implemented, Honig suggests examining the policy's goals, targets, and tools used to enact it, such as funding or professional development.

ADMINISTRATION	ADOPTION	MICRO-IMPLEMENTATION	TECHNICAL VALIDITY
A policy decision leads to a government program	A government program leads to the adoption of a local project	A local project forces districts to implement a practice	The implemented practice leads to outcomes
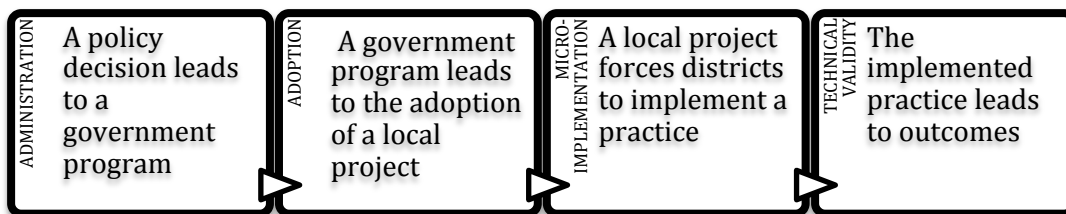
Figure 3. The policy chain. Adapted from Berman, 1978 (p. 167). In the course of policy implementation, key people – who are at varying levels of the hierarchy – move the policy through "passages" or stages. In the case of Regulation 310, in this study, the decision by lawmakers to enact accountability policies in Virginia equates to the "administration" link depicted in the figure. Lawmakers and staff at the Virginia Department of Education create government programs, such as the Standards of Accreditation, which then lead to required practices that land in schools and classrooms, in order to achieve the "technical validity" outcomes – reported as accreditation labels for schools.

| *Policy-Making Level*	→	*Local District Leadership Level*	→	*School Level*
PEOPLE: o General Assembly of Virginia o State Board of Education o Virginia Department of Education (VDOE)		**PEOPLE:** o School Board o Superintendent o Assistant Superintendent o Directors of Instruction; Instructional Coaches		**PEOPLE:** o Principal o Assistant principals, department chairs, grade-level lead teachers o Teachers o Parents / Community
POLICY ACTIONS: o Appropriates funding o Drafts and approves guidelines o Conducts academic reviews o Develops monitoring plans o Grants waivers o Receives reports and school improvement plans (SIPs)		**POLICY ACTIONS:** o Appropriates local funding o Is part of academic reviews o Approves SIPs o Adopts reading or math interventions o Submits reports o Requests a waiver		**POLICY ACTIONS:** o Undergoes academic review o Creates SIP o Implements interventions o Involves parents o Monitors teachers implementation of the policy
PLACE/CONTEXT: o Situated as lawmakers or regulators o Work is at a governmental level, not in a school or district		**PLACE/CONTEXT:** o District leaders overseeing all schools o Often liaisons between VDOE and schools		**PLACE/CONTEXT:** o Daily work is in the school o Sees specific challenges of teachers, students, and parents in this specific school

Figure 4. Elements of Regulation 310 reflecting people, policy, and places in the policy
chain. At each level – policymakers, district leadership, and school personnel – Regulation
310 requires particular actions of certain people, situated in their contextual settings.
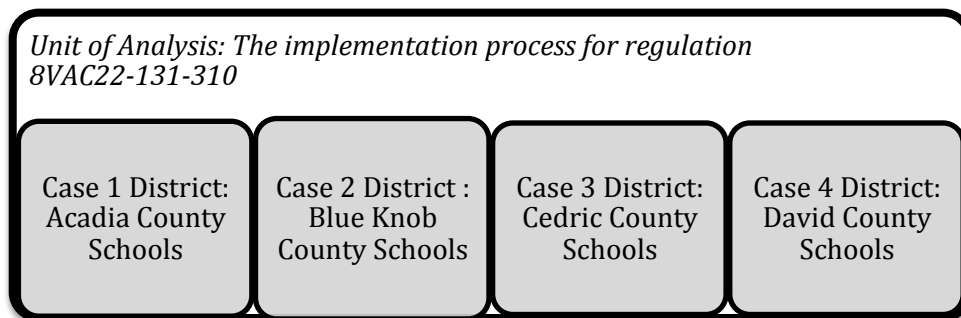
Figure 5. Unit of analysis and four districts used as cases in the multiple-case design. Adapted from Yin (2009). The focus of analysis for this study was the process of implementing Regulation 310, one component of accountability policy in Virginia. A multiple-case design allowed for more robust and compelling data. Each of the four consenting school districts constituted a case; and multiple schools and leaders were involved in each case. The multiple-case design allowed the researcher to examine data in four settings and make cross-case comparisons, while maintaining the focus on analysis of how implementation occurred.

CODES CATEGORIZED, THEMES IDENTIFIED, & CONCEPTUAL FRAMEWORK CONNECTED

PATHWAYS TO IMPLEMENTATION

OBSTACLES TO IMPLEMENTATION
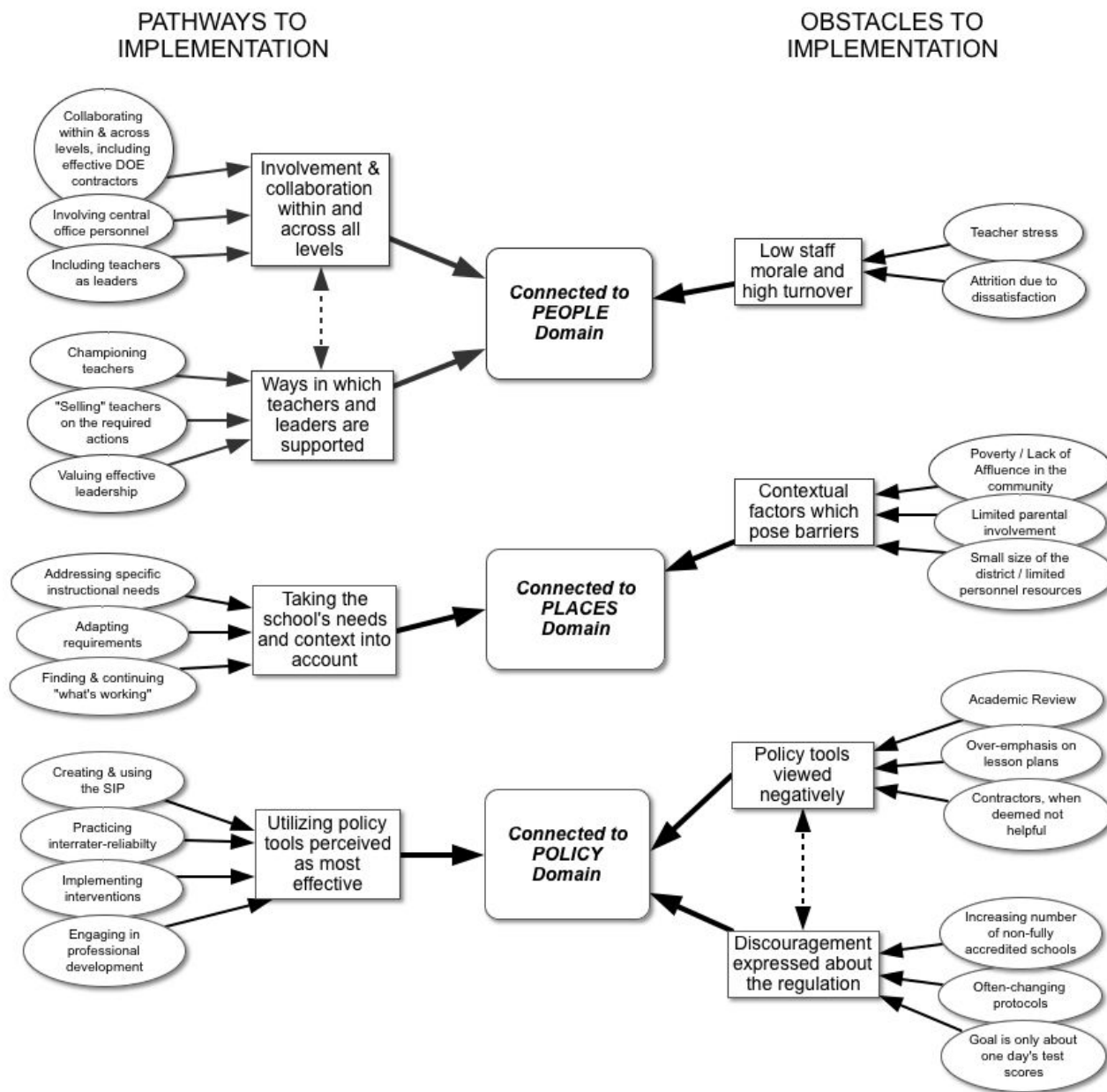
Figure 6. Codes categorized for unifying concepts, sorted by pathways or obstacles, and connected to the conceptual framework. In multiple rounds of coding and subsequent analysis, initial codes could be seen as enabling implementation (pathways) or discouraging participants (obstacles). Upon sorting codes as pathways or obstacles, and grouping codes around emerging commonalities, the researcher created categories and linked them to the conceptual framework domains of people, places, and policy.

"VERSUS" ANALYSIS							
Dominant Conceptual Framework Domains	Policy	Policy & Place	Policy	Policy	Policy & People	People	Place
Versus Concept, ====>	*Single goal of an SOL pass rate versus valuing multiple measures of success*	*Compliance versus collaborative &/or meaningful approach*	*(Over)Emphasis of lesson plan design versus other elements of instruction (engagement, discipline, curriculum alignment, etc.)*	*Lack of clarity on ever-changing DOE protocols versus full understanding & consistency*	*Hardship of time away from schools versus consideration of principals' /leaders' need to be on the job*	*Skepticism of the process/tool versus trust (that DOE is assisting, cares, wants to help, etc.)*	*Not accounting for the school's needs or context versus an individualized approach to helping schools*
By District							
Acadia	✓	✓✓	✓✓	✓	✓	✓	✓✓
Blue Knob	✓	✓	✓	✓	✓	✓	✓✓
Cedric	✓	×	×	×	✓	✓	×
David	✓	✓✓	✓	✓	×	✓✓	✓
By Level							
Central Office	✓✓	✓	×	✓	✓	✓✓	✓✓
Principal	✓	✓✓	✓✓	✓	✓	✓✓	✓

×	indicates **not** noted by these participants
✓	indicates noted by these participants
✓✓	indicates emphasized and noted multiple times by these participants

Figure 7. Analysis of affective participant data through versus coding. When interviews elicited strong emotions from research participants, the researcher employed an affective method of coding known as "versus coding" (Saldana, 2013). Participants' perceptions were identified and contrasted with what would constitute the opposing view, such as lack of clarity versus full understanding of requirements. The researcher analyzed the frequency and intensity of such codes by both case (district) and level of leader – district or school. The purpose of the process was to discern more about participants' sensemaking, emotional reactions, and beliefs during implementation, and to determine if differences existed across cases or levels of authority.

Appendix A
Regulation 8VAC20-131-310

(From REGULATIONS ESTABLISHING STANDARDS FOR ACCREDITING PUBLIC SCHOOLS IN VIRGINIA 8 VAC 20-131-10 et. seq.)

8VAC20-131-310. Action requirements for schools that are designated Partially Accredited in the following categories: (i) Improving School – Pass Rate; (ii) Improving School – Graduation and Completion Index; and (iii) Warned School.

A. With such funds as are appropriated by the General Assembly, the Department of Education shall develop a school academic review process and monitoring plan designed to assist schools rated as Partially Accredited in the following categories: (i) Improving School – Pass Rate; (ii) Improving School – Graduation and Completion Index; and (iii) Warned School. All procedures and operations for the academic review process shall be approved and adopted by the board.

Schools rated Partially Accredited in the following categories: (i) Improving School – Pass Rate; (ii) Improving School – Graduation and Completion Index; and (iii) Warned School must undergo an academic review in accordance with guidelines adopted by the board and prepare a school improvement plan as required by subsection F of this section.

B. Any school that is rated Partially Accredited: Warned School – Pass Rate because of pass rates in English or mathematics shall adopt a research-based instructional intervention that has a proven track record of success at raising student achievement in those areas as appropriate.

C. The superintendent and principal shall certify in writing to the Board of Education that such an intervention has been adopted and implemented.

D. The board shall publish a list of recommended instructional interventions, which may be amended from time to time.

E. Adoption of instructional interventions referenced in subsections B and D of this section shall be funded by eligible local, state, and federal funds.

F. A three-year School Improvement Plan must be developed and implemented, based on the results of an academic review of each school that is rated Partially Accredited in the following categories: (i) Improving School – Pass Rate; (ii) Improving School – Graduation and Completion Index; and (iii) Warned School upon receipt of notification of the awarding of this rating and receipt of the results of the academic review. The plan:

1. Shall be developed with the assistance of parents and teachers and made available to the public;

2. Must include the components outlined in subsection G of this section; and

3. Must be approved by the division superintendent and the local school board and be designed to assist the school in meeting the student achievement standard to be Fully Accredited as outlined in 8VAC20-131-300.

G. The improvement plan shall include the following:

1. A description of how the school will meet the requirements to be Fully Accredited, for each of the years covered by the plan;

2. Specific measures for achieving and documenting student academic improvement;

3. A description of the amount of time in the school day devoted to instruction in the core academic areas;

4. Instructional practices designed to remediate students who have not been successful on SOL tests;

5. Intervention strategies designed to prevent further declines in student performance and graduation rates;

6. Staff development needed;

7. Strategies to involve and assist parents in raising their child's academic performance;

8. The need for flexibility or waivers to state or local regulations to meet the objectives of the plan; and

9. A description of the manner in which local, state, and federal funds are used to support the implementation of the components of this plan.

As part of its approval of the school improvement plan, the board may grant a local school board a waiver from the requirements of any regulations promulgated by the board when such a waiver is available.

H. The school improvement plan and related annual reports submitted to the board shall provide documentation of the continuous efforts of the school to achieve the requirements to become rated Fully Accredited. The board shall adopt and approve all policies and formats for the submission of annual reports under this section. The reports shall be due no later than October 1 of the school year.

Statutory Authority

§§ 22.1-16 and 22.1-253.13:3 of the Code of Virginia.

Historical Notes

Derived from Virginia Register Volume 14, Issue 1, eff. October 29, 1997; amended, Virginia Register Volume 16, Issue 25, eff. September 28, 2000; Volume 22, Issue 24, eff. September 7, 2006; Volume 25, Issue 21, eff. July 31, 2009; Volume 31, Issue 26, eff. October 8, 2015.

Retrieved from: http://www.doe.virginia.gov/boe/accreditation/regulations_establishing_soa.pdf

Appendix B
Sample of Email Requesting Permission to Include Districts

Date

Dear Dr. _____,

I write you today in my role as a doctoral candidate at the Curry School at the University of Virginia. The research for my capstone dissertation focuses on required actions for schools when they are deemed Partially Accredited. Whether a school is currently in one of the Partially Accredited categories or has recently moved out of the status, leaders' insights on the processes that take place to implement such requirements would be extremely valuable to my work. This qualitative research is significant because it explores how such mandates are implemented and will tell a story on challenges and successes.

I have been approved by UVa's IRB and am at the stage wherein I secure permissions of four districts, and the leaders therein, who would be willing to participate in my capstone study. I am wondering if you might consider allowing _____ County to be a participant. Involvement is completely voluntary and would mean allowing me an interview of no more than 1 hour for 2-4 leaders in your district – 1 or 2 at the central office level and 1 or 2 school leaders. I would also benefit from reading documents such as the school improvement plan.

I realize it is a very busy time of year to ask *anything* of schools. Please know that the interviews can wait until leaders are able to clear the time, even if that means very late spring or early summer. One reason for me writing at this point in time is to allow me to proceed through submissions of necessary paperwork that your district may require for a study. Again, I have IRB approval and will provide that to all districts. If permission / consent is granted, I will arrange for the interview time to be completely at the participating administrator's convenience and with explicit consent.

The privacy and confidentiality of my participants will be strictly protected, as no identifying information about the districts and schools I study will be included. Only descriptive information about the school districts – for the purpose of relaying context – may be in the study results, but would be non-identifiable attributes, such as "small" or "large" school divisions.

I hope you will consider participating but realize you may have questions in order to decide for sure. Please contact me by phone or email if that is the case and I'll be happy to explain further.

Thanks very much.

Appendix C
Semi-Structured Interview Protocol and Questions for School/District Personnel

<u>Interview Protocols</u>

- All interviews will take place at the location of the respondent's choosing (office, classroom, a conference room, or similar). Respondent will be asked where a comfortable, quiet place is in his/her building and researcher will reserve that space ahead of time, if needed.
- All interviews will be scheduled a minimum of 1 week in advance. Time will be suitable for the respondent; the researcher will accommodate scheduling needs.
- There will be one hour allotted for each interview. Respondents will be told that the researcher expects the interview to take approximately 60 minutes, although he/she can choose to block off 60-90 minutes.
- All interviews will be audio recorded.
- Respondents will have agreed to be interviewed per a signed Consent Form.
- Because these interviews are semi-structured, *the researcher will frequently insert probes and follow-up questions*. The questions listed here are only initial prompts to begin responses on each topic.
- The researcher will allow adequate response time, will minimize interjections, and will exercise active listening, to insure the respondents have the opportunity to provide their own responses and can elaborate on ideas.

<u>Initial script for the interview, to be read by the researcher:</u>

"As you know, I am doing research on the implementation of a policy that is part of the Virginia code of regulations on public schools. Specifically, regulation 8VAC20-131-310 sets up things a school must do if they are deemed Partially Accredited. These actions include undergoing an academic review, adopting interventions, and drafting and implementing a school improvement plan, among others.

Because your <district / school> falls in this category, I am looking to learn more about your process for implementing the required actions in this policy.

I will add that the overarching 'policy' is about accreditation and accountability; this one part of it is a 'regulation.' I may interchange those terms, but either way, I'm referring to the actions in 8VAC20-131-310.

I also wanted to be clear on the word 'implementation' that I'll use a lot today. For my purposes, this means any actions you or your staff has taken to comply with the state's regulation. So understand it might be *creating* a SIP; or it might be *doing the steps <u>in</u> the SIP*.

This will be a semi-structured interview, which means I will be asking you questions on this policy and its implementation. But, I invite you to elaborate or provide follow-up information at any time. If you think of something that you feel connects to my question, while not being an exact answer, please share those thoughts.

I am audiotaping our interview in order to recall all of the conversation and properly transcribe my questions and your responses. As noted on your Consent Form, your name will not be used in any of my research, and this audiotape will be destroyed at the close of my dissertation work.

I really appreciate the time you are giving me and invite you to ask me to clarify anything at all during the interview.

Do you have any questions before we begin?"

<u>Questions</u>

1. How would you describe the problems or challenges in your <district, school, or classrooms> that led to you having to implement the policy on school improvement?

2. Can you describe how the process of implementing these VDOE regulations first started in your <district / school>?

3. What is your understanding of the goals of this regulation? Who or what is it targeting, in your view?

4. What tools or instruments have you used or been given by <VDOE / your central office / your building leaders> in order to implement this regulation? Can you describe how they are used?

   (Likely will require defining tools and instruments to be: funding, professional development, capacity-building, sanctions)

5. Who has been involved in this work? I am interested in who drafted the school improvement plan. Who took part in the academic review, or any other facets of the implementation?

6. How have these folks been involved?

7. Can you describe the interactions between groups and between 'levels' in this process? In other words, do grade level teams work together to implement to SIP actions? Does central office support principals in particular ways?

8. Does implementation look different in the different places that you work in or oversee? For example (if district level) how did the schools differ in their implementation? (For a principal) – How did the grade levels or departments differ in their implementation?

9. What elements (factors, aspects) of your community, district, school, or classrooms do you feel make implementing this regulation more difficult or easier than perhaps it might be in a different place? How so?

Appendix D
Semi-Structured Interview Protocol and Questions for VDOE Personnel

<u>Interview Protocols</u>

- The interview will take place at the location of the respondent's choosing (office, a conference room, or similar). Respondent will be asked where a comfortable, quiet place is in his/her building and researcher will reserve that space ahead of time, if needed.
- The interview will be scheduled a minimum of 1 week in advance. Time will be suitable for the respondent; the researcher will accommodate scheduling needs.
- There will be one hour allotted for each interview. Respondents will be told that the researcher expects the interview to take approximately 60 minutes, although he/she can choose to block off 60-90 minutes.
- The interview will be audio recorded.
- Respondent will have agreed to be interviewed per a signed Consent Form.
- Because the interview is semi-structured, *the researcher will frequently insert probes and follow-up questions*. The questions listed here are only initial prompts to begin responses on each topic.
- The researcher will allow adequate response time, will minimize interjections, and will exercise active listening, to insure the respondents have the opportunity to provide their own responses and can elaborate on ideas.

<u>Initial script for the interview, to be read by the researcher:</u>

"As you know, I am doing research on the implementation of regulation 8VAC20-131-310, that is, the required actions when a school is Partially Accredited.

Because I am looking to understand the whole process, from regulation to classroom, this interview with you is important. It will allow me to understand more on this regulation from your perspective, as a VDOE staff member.

I wanted to be clear on the word 'implementation' that I'll use a lot today. For my purposes, this means any actions staff takes to comply with the regulation. So understand it might be academic review related, the schools *creating* a SIP; or it might be *doing the steps <u>in</u> the SIP*.

This will be a semi-structured interview, which means I will be asking you questions on this policy and its implementation. But, I invite you to elaborate or provide follow-up information at any time. If you think of something that you feel connects to my question, while not being an exact answer, please share those thoughts.

I am audiotaping our interview in order to recall all of the conversation and properly transcribe my questions and your responses. As noted on your Consent Form, your name will not be used in any of my research, and this audiotape will be destroyed at the close of my dissertation work.

I really appreciate the time you are giving me and invite you to ask me to clarify anything at all during the interview.

Do you have any questions before we begin?"

Questions

1. How would you describe the problems or challenges in a <district, school, or classroom> that leads to the school having to implement this regulation?

2. Can you describe how the process of implementing these actions first starts in a <district / school>?

3. What are the goals of this regulation? Who or what is it targeting, in your view?

4. What tools or instruments can districts/schools use or are they given by <VDOE / central office / building leaders> in order to implement this regulation? Can you describe how they are used?

(May require defining tools and instruments to be: funding, professional development, capacity-building, sanctions)

5. Who do you as a VDOE person suggest that schools involve in this work? I am interested in who drafts the school improvement plan. Who takes part in the academic review, or any other facets of the implementation?

6. How would these folks been involved?

7. Can you describe the interactions that you envision happening between groups and between 'levels' in this process? How does your office work with the schools and districts? And do see grade level teams working together to implement to SIP actions? Central office with principals?

8. How does implementation look different in the different places?

9. What elements (factors, aspects) of community, district, school, or classroom do you see might make implementing this regulation more difficult or easier than perhaps it might be in a different place? How so?

**Appendix E
First Round Codes**

Axial Codes – created from the study's conceptual framework

PEOPLE	PLACES	POLICY ELEMENTS
Co-construction	Cultural context	Funding
Communities of practice	Historical context	Goals
Mutual adaptation	Instructional needs of my/our school(s)	Professional development
Organizational fields	Political climate	Targets
Trust and relationships	Readiness	Tools
Social capital		
Sensemaking		

Open codes – created from participants' responses

AARPE Sessions	Changing policy elements & processes	Importance of leadership at school & district levels	Small size
Academic review	Community dynamics or involvement	Interrater reliability	SOL pass rate as only metric of success
Affluent (or not)	Compliance	Intervention program or initiative	Teacher stress
Angry or scornful	Contractors	Lesson plan emphasis by VDOE	Uncertainty
Attrition	Criticism of VDOE	Our specific needs	Using teacher leaders in implementation
Buy in and selling of ideas	Defending and championing teachers	Parents	VDOE being overwhelmed with non-Fully Accredited schools
Central office leadership team for school improvement	Frustration with VDOE	SIP emphasized	What's working