



NORTH CAROLINA
State Board of Education
Department of Public Instruction

Report to the North Carolina General Assembly

Accountability System Review and
Recommendations for Evaluating School
Quality in North Carolina

Date Due: ---

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Introduction

This report describes the Department of Public Instruction’s (NCDPI) efforts to engage education leaders and stakeholders in discussions about recommendations for potential revisions to North Carolina’s current accountability system. The foundation of this work is Superintendent Catherine Truitt’s Operation Polaris, which she unveiled in September 2021 as her strategic plan to create stronger policies and systems to guide North Carolina’s K–12 public schools. Superintendent Truitt launched her signature action plan during the height of the pandemic, identifying the state’s most urgent public education priorities: literacy, human capital, testing and accountability, learning recovery, and student support services.

The plan was updated earlier this year as Operation Polaris 2.0 with input from the State Board of Education and the N.C. General Assembly. The revised plan builds on the successful strategies implemented during the past two years and is aimed at optimizing systems and introducing policies that drive the best possible outcomes for students in traditional public schools and charter schools. Seven transformational strategies included in Polaris 2.0 are designed to strengthen faith and trust in the state’s public schools, rebuild the teacher talent pipeline and prepare students for success in an ever-changing world. Accountability and testing, one of the seven strategies, is focused on redesigning North Carolina’s system of assessing the performance of the state’s K–12 schools. The vision is an accountability system that ensures a sound, basic education for every student by measuring success based on preparedness for the workforce, higher education, and robust civic participation.

As of December 2021, eleven states used an A–F accountability model to report school performance and to meet federal and state accountability requirements. In recent months, some states have reevaluated their A–F based accountability systems. In March, Utah’s governor signed a law eliminating the state’s A–F accountability model, and Michigan followed with a similar law in May 2023. Like North Carolina, Oklahoma is currently reviewing their A–F accountability system. In contrast to these actions, Arizona is potentially strengthening its A–F system through proposed legislation that would allow a school board to terminate a district superintendent’s contract if one or more schools have received “D” or “F” grades for at least three years.

Providing information on the NCDPI’s progress in its review of the A–F accountability system, this report highlights the work of the School Performance Grade Redesign Advisory Group, a group of diverse stakeholders representing educators and other community interests that was convened to address the accountability component in Polaris 2.0. This group met regularly from September 2022 to January 2023 to provide input on the most appropriate and impactful measures of school performance.

As shared with the advisory group at its initial meeting in September 2022, Section I of this report provides a brief history of accountability in North Carolina and summarizes the current accountability system. Included in this section are the rationales for revising the current accountability system and the guiding principles to ensure this effort is aligned to the state’s values and priorities for providing a sound basic education for all students.

Section II opens with a summary of the purposes, participants, and input processes of the advisory group. The first meeting provided context for the group's purpose to identify potential indicators that would more accurately and fairly measure school performance in North Carolina. In addition to the advisory group's input over several subsequent virtual meetings, NCDPI leadership engaged with district superintendents and leaders, charter school leaders, principals, teachers, parents, school board members, and the general public to ensure various perspectives and expertise were included. This was accomplished with several in-person presentations and a series of surveys. All of these efforts yielded recommendations for redesigning the system with an expanded set of school quality indicators, which are defined and discussed.

Section III proposes a brief plan and timeline for developing evidence-based recommendations to inform a new system of school accountability. The recommendations will be vetted through ongoing comprehensive stakeholder reviews, research on new indicators and adherence to the state's core educational values, goals, and outcomes for students.

Section I: Background and Guiding Principles

School Accountability System

North Carolina's state accountability system has been an innovative and important lever used for more than three decades to identify schools needing improvement. In the mid-1990s, an accountability system was implemented for high schools, followed by the development of one for grades 3–8. Framed as the ABCs accountability system, both reported schools' performance on state assessments with an additional measure of student-level growth on the same assessments. In 2001, in its reauthorization of the Elementary and Secondary Education Act (ESEA) of 1965, Congress enacted No Child Left Behind (NCLB). NCLB, like the ABCs accountability system, included identifying schools for assistance or corrective action. These requirements were in addition to the state requirements for low-performing schools already in place.

In 2014, Congress began the work of reauthorizing ESEA, resulting in a transition period when the requirements of NCLB were waived. During this period, the General Assembly drafted legislation (G.S. 115C-83.15) for an A–F grade-based school performance accountability model. The first results were reported in February 2015 based on test scores from the 2013–14 school year. With the enactment of the Every Student Succeeds Act (ESSA), a component of the reauthorized ESEA, the school performance grade accountability model was codified in state law to meet federal requirements and law (G.S. 115C-83.16).

As required in ESSA, the federal accountability system requires the following:

- Percentage of students demonstrating proficiency on state assessments in reading and mathematics
- Percentage of English learners who meet English language acquisition progress targets
- Percentage of students meeting another measure of academic progress for elementary and middle schools (percentage of students proficient on state assessments in science at grades 5 and 8)
- Percentage of students who meet high school graduation requirements within four years of entering grade 9 for high schools
- Percentage of students who meet a state-determined measure of school quality or student success; at least one for each grade span
 - Elementary and middle schools: growth on reading, mathematics, and science assessments
 - High schools: growth on NC Math 1, NC Math 3 and English II assessments

Additionally, North Carolina's accountability system for high schools includes the following school quality or student success measures:

- Percentage of students proficient on the biology end-of-course assessment,
- Percentage of students in grade 12 who meet the benchmark for ACT or ACT WorkKeys, and
- Percentage of students in grade 12 who complete the NC Math 3 course with a passing grade.

The school performance grades and school growth statuses are used to determine state and federal determinations of schools needing support and assistance. State designations of low-performing schools, districts, and charter schools are based on schools' A–F grades and growth statuses. There are four designations:

- Low performing schools are those receiving a school performance grade of D or F and a school growth designation of *met expected growth* or *did not meet expected growth*.
- Recurring low performing schools are those identified as low performing in any two of the last three years.
- Low performing districts are those where the majority of the districts' schools or a charter school have been identified as low performing.
- Continually low performing charter schools are those identified as low performing in any two of the last three years.

Federal designations include schools needing comprehensive support and improvement and targeted support and improvement. The identification and exit criteria is located at <https://www.dpi.nc.gov/media/6940/download>.

The School Performance Grade Redesign Advisory Group was not constrained by the federal requirements cited above. Members acknowledged the federal requirements must be met, but they also noted that North Carolina has the opportunity to develop a state system separate from meeting the federal requirements or a system that has additional North Carolina developed indicators. The group was encouraged to propose indicators that would best represent the qualities and expectations of a North Carolina school.

School Performance Grades Outcomes

In the seven years that school performance grades have been reported for North Carolina's more than 2,500 schools, stakeholders have provided extensive feedback on the efficacy of the system. Frequently noted is the distribution of the indicators' weights in the A–F calculation. Indicators that contribute to the achievement score (proficiency on end-of-grade and end-of-course tests, cohort graduation rate, English learners' progress) comprise 80% of the overall grade; growth as measured by EVAAS comprises the remaining 20%. Discussions of whether achievement should count significantly more than growth have persisted. One factor in the weight distribution is the ESSA requirement that achievement counts for a preponderance of the system's weight; however, this requirement does not specify a specific quantitative value, which could be as low as 51%.

Feedback from educators on the outcomes of the A–F model has also included observations that the identification of schools with a grade of D or F typically correlates with a schools' percentage of economically disadvantaged students. A significant number of schools that earn Ds and Fs have a substantial population of students identified as economically disadvantaged. This pattern has been consistent across years. When viewed as separate measures, growth status does not correlate as strongly to economically disadvantaged status, and thus the view has been that growth should count more than it does in the current system.

Compared to other states that identify schools based on an A–F grading system, North Carolina has more D and F schools and fewer A schools. These differences are most likely due to the variation in the indicators used and the weighting of the indicators; however, it is useful to review other states’ A–F letter grade distributions.

Of the states shown in Table 1, North Carolina had the highest number and percentage of D or F schools (1,097 schools for 42.3%) in the 2021–22 school year. Three of the comparison states have less than 10% of schools identified as D or F, and two states (Louisiana and Mississippi), though higher than 10%, are significantly lower than North Carolina. These comparisons are based on accountability reports for the 2021–22 school year, noted as a year during the COVID pandemic with the associated impacts on schools and communities.

Table 1: *School performance grade (A–F) state comparisons for the 2021–22 school year**

State	A Schools N (%)	B Schools N (%)	C Schools N (%)	D Schools N (%)	F Schools N (%)	Total Schools
North Carolina	145 (5.6)	446 (17.2)	907 (35.0)	833 (32.1)	264 (10.2)	2,595
Arizona	485 (27.3)	767 (43.2)	403 (22.7)	89 (5.0)	30 (1.6)	1,774
Florida	1,069 (32.1)	842 (25.1)	1,229 (36.7)	182 (5.4)	26 (0.7)	3,348
Louisiana	192 (15.9)	362 (29.9)	350 (29.0)	178 (14.7)	124 (10.3)	1,206
Mississippi	258 (29.8)	273 (31.5)	172 (19.8)	122 (14.1)	41 (4.7)	866
Texas	2,356 (27.9)	3,895 (46.1)	1,636 (19.4)	376 (4.4)	188 (2.2)	8,451

*Due to rounding, totals may not equal 100%

Similar A–F distributions across all letter grades are noted in Table 2, suggesting the results of Table 1 are not a confounding factor of the COVID pandemic.

Table 2: *School performance grade (A–F) state comparisons for the 2018–19 school year**

State	A Schools N (%)	B Schools N (%)	C Schools N (%)	D Schools N (%)	F Schools N (%)	Total Schools
North Carolina	203 (8.0)	745 (29.3)	1044 (41.1)	460 (18.1)	91 (3.6)	2,543
Arizona	483 (27.3)	575 (32.5)	489 (27.6)	169 (9.5)	54 (3.1)	1,770
Florida	1181 (35.5)	909 (27.3)	1065 (32.0)	159 (4.8)	14 (.4)	3,328
Louisiana	205 (15.5)	413 (31.2)	378 (28.6)	188 (14.2)	137 (10.4)	1,321
Mississippi	196 (22.4)	280 (32.0)	169 (19.3)	153 (17.5)	77 (8.8)	875
Texas	1,750 (21.1)	3,276 (39.5)	2,171 (26.1)	703 (8.5)	402 (4.8)	8,302

*Due to rounding, totals may not equal 100%

The differences in the distribution of A–F grades in North Carolina and other states are most likely not related to empirical differences in student achievement. This conclusion is supported by the same comparative states’ NAEP data from 2019 and 2022 in Tables 3 and 4 below.

Table 3: NAEP 2019 State Comparisons Mean Scale Score

State	Math Grade 4	Math Grade 8	Reading Grade 4	Reading Grade 8
North Carolina	241	284	221	263
Arizona	238	280	216	259
Florida	246	279	225	263
Louisiana	231	272	210	257
Mississippi	241	274	219	256
Texas	244	280	216	256
National Average	240	281	219	262

Blue: Statistically Higher than North Carolina

Green: Not Statistically Different than North Carolina

Yellow: Statistically Lower than North Carolina

Table 4: NAEP 2022 State Comparisons Mean Scale Score

State	Math Grade 4	Math Grade 8	Reading Grade 4	Reading Grade 8
North Carolina	236	274	216	256
Arizona	232	271	215	259
Florida	241	271	225	260
Louisiana	229	266	212	257
Mississippi	234	266	217	253
Texas	239	273	214	255
National Average	235	273	216	259

Blue: Statistically Higher than North Carolina

Green: Not Statistically Different than North Carolina

Yellow: Statistically Lower than North Carolina

In Table 3 of the 2019 NAEP results, North Carolina has the highest mean scale score for grade 8 mathematics and is tied with Florida for the highest mean scale score in grade 8 reading. In Table 4 of the 2022 NAEP results, North Carolina had the highest mean scale score for grade 8 mathematics. None of the results place North Carolina last among the six states reviewed, which would be expected given North Carolina has substantially more D and F schools than the other states. Moreover, North Carolina’s 2019 NAEP scores ranked above the national average in all tested subjects and grades. North Carolina’s 2022 NAEP scores were higher than the national average in all tested grades and subjects with the exception of grade 8 reading.

NAEP data affirms North Carolina schools are performing considerably better than their state performance grades otherwise suggest. The disproportionately large numbers of D and F schools

in North Carolina, as compared to other states, prompts two questions: How can North Carolina strengthen the validity of its accountability system for assigning school performance grades? And how might evolving values and priorities of North Carolina stakeholders influence revisions to the current system and its intended uses?

As described in Section II of this report, the School Performance Grade Redesign Advisory Group engaged in discussions of the purposes and uses of an accountability system with an emphasis on responding to the question: What indicators yield a clear and accurate representation of a high-quality school in North Carolina? This question prompted participants in the advisory group and other stakeholders in engagement sessions to consider an accountability system that goes beyond test scores and shows the breadth and depth of school success in North Carolina.

Section II: Stakeholder Engagement and Input

The work on the accountability system as part of Superintendent Truitt’s Operation Polaris has consisted of two phases. The first phase was a stakeholder group of educators and other leaders who began meeting in spring 2021. This group’s discussions included accountability and testing. There was consistent feedback that a review of the school performance grades accountability system was warranted. With this feedback as a foundation, in September 2022 the group was reconstituted with expanded representation, and the group was tasked with addressing the school performance grades accountability system, not the testing program. Known as the School Performance Grades Redesign Advisory Group, it was composed of diverse stakeholders representing education interests and priorities in North Carolina. A list of members and information on the groups’ meetings is at [School Performance Grade Redesign | NC DPI](#) . Figure 1 shows the working time frame presented in September 2022 to the School Performance Grades Redesign Advisory Group. An updated time frame has been provided in Section III of this report.

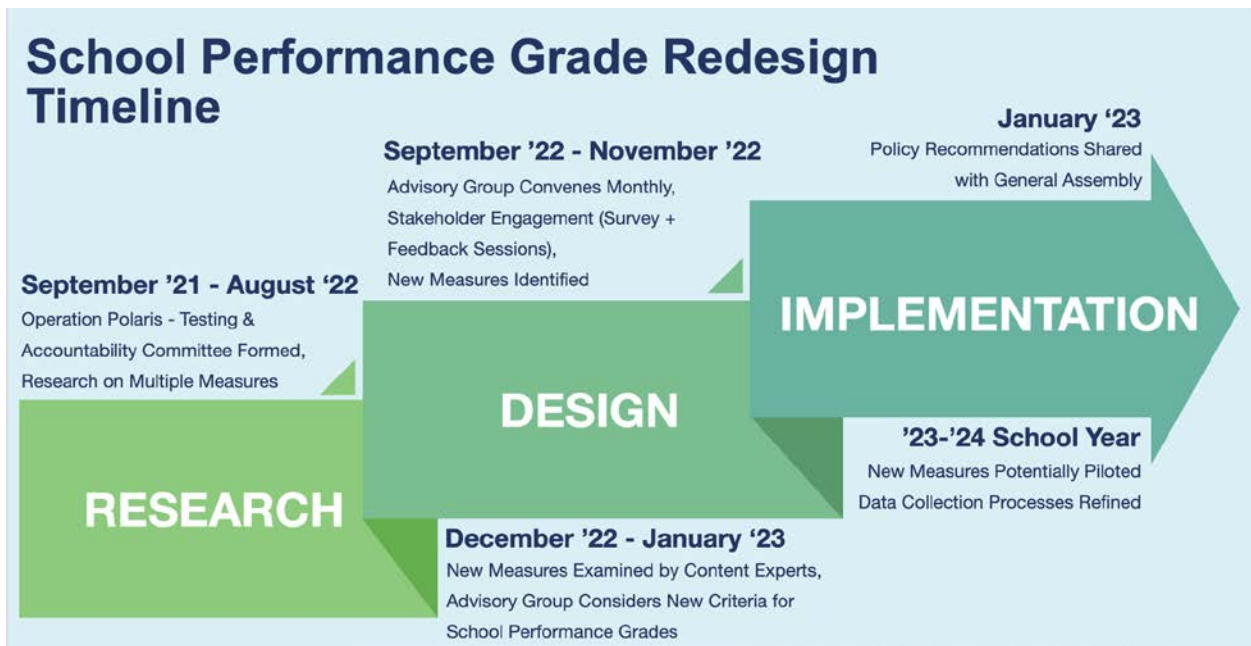


Figure 1: School performance grade redesign timeline

After a pre-workgroup conference call in August 2022, when the group was provided an orientation to this phase of the work, the advisory group met on September 13, 2022, at the Education Building. To provide context for the work, Superintendent Catherine Truitt and Deputy Superintendent Michael Maher emphasized in opening remarks the need as two-fold: to consider revisions to the current school performance grades so school performance designations are more accurate and to identify measures that will ensure students are prepared for postsecondary success in their chosen pathway. A key consideration in the discussions was the use of the school designations to identify schools with the greatest need and equitably allocate school resources and support.

Accountability Systems Requirements and Other States' Approaches

Presenting at the September meeting were Brian Gong and Chris Brandt, accountability and testing experts with the National Center for Assessment. Gong and Brandt shared information on the federal requirements for accountability and other states' systems, including a review of the possibility of having a state accountability system separate from the federally required one. Gong and Brandt discussed how states vary in the designs of their accountability systems, with some following a blended state and federal approach (Texas) and some having separate state and federal systems (Wisconsin). The option of local choice for some indicators is evident in some state systems, but any indicator used for federal requirements cannot be a local-choice indicator. Federal law requires states to hold all schools accountable to the same expectations. Also shared was information about North Carolina's current indicators that are required by federal law and those that are North Carolina specific.

Whatever approach individual states take with their accountability systems, there are federal requirements under ESSA that must be met annually. These requirements include:

- Assessments in reading and math (grades 3–8, once in high school)
- Assessments in science (at least once in grades 3–5, 6–8, high school)
 - All assessments must be administered to at least 95% of the eligible students
- A measure of English learners' progress in achieving proficiency in the English language
- State defined goals and targets for determining whether a student is making sufficient progress each school year
- An additional measure of academic achievement for elementary and middle schools
- At least one measure of school quality or student success for all schools
- A four-year cohort graduation rate for all high schools

States must identify schools as needing Comprehensive Support and Improvement (CSI), which are those performing in the bottom 5% of all Title I schools and high schools with low graduation rates; Additional Targeted Support and Improvement (ATSI), schools with low performing subgroups performing at or below the bottom 5% of schools; and Targeted Support and Improvement (TSI), schools with consistently low performing subgroups. States must also set long-term goals with targets for each student subgroup to increase achievement each school year.

In their accountability systems, states may set the weights for each indicator, but the weight of the combined achievement indicator must be substantially more than the school quality or student success indicators.

States have several areas within their control. With respect to the content the assessments measure, states adopt their content standards with the qualifier that such standards are aligned to college and career readiness. States can assess other grade levels and content areas, and states may include other academic indicators, school quality or student success indicators in their accountability systems. Within the law, states determine the measurement criteria and the business rules for the data analysis. A state's plan for meeting ESSA is documented in its state plan and submitted to the U.S. Department of Education (USED) for review. When there is a

legal requirement that is not being met, the USED collaborates with the states to resolve the deficiency.

The implementation of states' ESSA state plans range from different indicators and weights to different identification criteria for CSI and TSI. In their presentation to the advisory group, Gong and Brandt provided examples of states' accountability plans that differed from each other and from North Carolina.

Table 5: *States' accountability systems*

State	Key Features
Texas	Includes local accountability indicators for schools that meet a certain benchmark for student achievement. For these schools, the locally selected indicators may comprise 50% of the state accountability system. The local indicators cannot be used for any federal requirements such as identifying or exiting CSI, ATSI, and TSI status.
Wisconsin	Includes two accountability systems: a state system and a federal system. The state system's primary purpose is to drive continuous improvement whereas the federal system's primary purpose focuses on federal compliance. Indicators within these two systems are different but include considerable overlap. For example, both systems include achievement, growth, and chronic absenteeism. However, the state system includes additional measures such as on-track and post-secondary readiness measures and gap closure measures.
Kentucky	Includes year over year improvement in school performance. Overall performance for districts, schools, and school subgroups is determined using six performance indicators. For each indicator, current year performance (status) and improvement (change from prior to current year) is separately calculated and later combined. The indicators are then aggregated into an overall performance score. The Kentucky Department of Education reports school accountability results for each state indicator, and for aggregate performance, using a status by change matrix.

This information led to a discussion of what measures are evidence of a high quality school. The advisory group members generated an extensive list of possible accountability indicators related to quality schools. The members were encouraged to consider all possibilities. As a follow-up to the meeting, this list was formatted into a survey that was distributed, in partnership with the education news organization EdNC, to parents, students, teachers, principals, other educators and the general public to identify the indicators they perceived as being valid measures of quality schools in North Carolina. The survey included open-ended questions for respondents to indicate their perspectives on the purposes and uses of accountability for students and schools. It also asked for additional indicators that should be included as measures of school quality. More than 19,000 responses to the survey were received, with some responses from students and parents.

Gathering Input and Culling the List of Indicators

Over the next several meetings in the fall of 2022, the advisory group discussed the proposed indicators, focusing on the potential of which indicators would contribute to an overall measure of school quality and performance. Specifically, in October, the advisory group reviewed EdNC survey results and discussed trends. To ensure alignment with other stakeholders, members were asked to discuss the results with their peers using a conversation guide. During the November and December advisory meetings, the advisory group narrowed what was a lengthy list of indicators to top academic indicators and non-academic indicators for further review and refinement.

At the same time, the NCDPI team shared the evolving work with multiple stakeholder groups including superintendents and charter school leaders, district level leaders, principals, and teachers. Engagement with professional groups included the NC School Boards Association, the NC Principals and Assistant Principals Association, and the Governor’s Teacher Advisory Committee. Several presentations at regional meetings, conferences — such as the AIM conference — and other stakeholder meetings across the state ensured the outreach included all of the State Board of Education regions. Collectively, the feedback shared from these groups included extensive input on the refinement of potential indicators.

Several consistent themes emerged from the survey results and the audiences at the presentations, with many of the comments aligning with Superintendent Truitt’s rationale for pursuing a redesign of the school performance grades accountability system.

- The current weights for achievement (80%) and growth (20%) emphasize the test results as reported by academic achievement levels. Though students may not demonstrate proficiency, they may show growth over time. At 20%, growth is not a significant part of the accountability model’s weights.
- With a large number of D/F schools, the current A–F system may not effectively identify those schools most in need of assistance and support.
- The current growth model (EVAAS) does not provide student-level data for transparency at the school level.
- Indicators that measure outcomes other than test scores are recommended. Support for the Portrait of a Graduate’s durable skills was noted as well as measures of school climate.

Based on these conclusions, the list of indicators was reviewed to determine levels of agreement across all feedback. Some indicators were collapsed to provide more aligned metrics. For example, school safety, environment and cleanliness were merged into one indicator: School Climate. Indicators with little support, weak validity and reliability, and other hard-to-measure indicators were removed from the proposed list. Examples include teacher job satisfaction and school characteristics,

On January 31, 2023, the advisory group reconvened to review the progress of the work, and based on the cumulative feedback, a list of eight indicators was culled for further study. As with the initial meeting and all feedback sessions across the state, discussion of the importance of addressing the achievement and growth weights of 80/20 was central to the conversation. Also

stressed was the importance of having an accountability system that is transparent and an accurate representation of what is happening within all schools.

The recommended eight indicators for further study include the following:

- Five-year cohort graduation rate: the percentage of students who fulfill graduation requirements within five years of entering grade 9
- Chronic absenteeism: the percentage of students who exceed a specified number of absences deemed to be chronic (requires refining of definition)
- Improvement in student group performance: measures of subgroup performance as defined by growth targets and actual outcomes
- Postsecondary Inputs
 - Elementary: Percentage of students who participate in a career exploration activity
 - Middle: Percentage of students who have a career development plan
 - High school: Percentage of students who fulfill at least one of a defined list of post secondary preparation programs/classes/certifications
- Postsecondary Outcomes: Percentage of graduates who either have confirmed acceptance or enrollment in a postsecondary institution, enlistment in the military, or employed
- Extra/Intra Curricular: Percentage of students who participate in at least one extracurricular or intra-curricular activity
- Durable Skills: Informed by the developing rubrics for the competencies defined by the Portrait of a Graduate initiative
- School Climate: Possibly a student and teacher survey instrument

The School Performance Grade Redesign Advisory Group's identification of these indicators laid a foundation for continued work on the possibilities for revising North Carolina's accountability system. In addition to identifying potential indicators to evaluate schools more broadly, rather than the current focus on test scores, the advisory group set the stage for an integrated approach achieved by frequent collaboration and feedback loops. Section III provides information on the next phase of this work.

Section III: Next Steps

With the recommendations from the School Performance Grades Redesign Advisory Group and other stakeholders' feedback, the NCDPI will proceed to study the additional potential indicators. The timeline below delineates the workflow through February 2024.

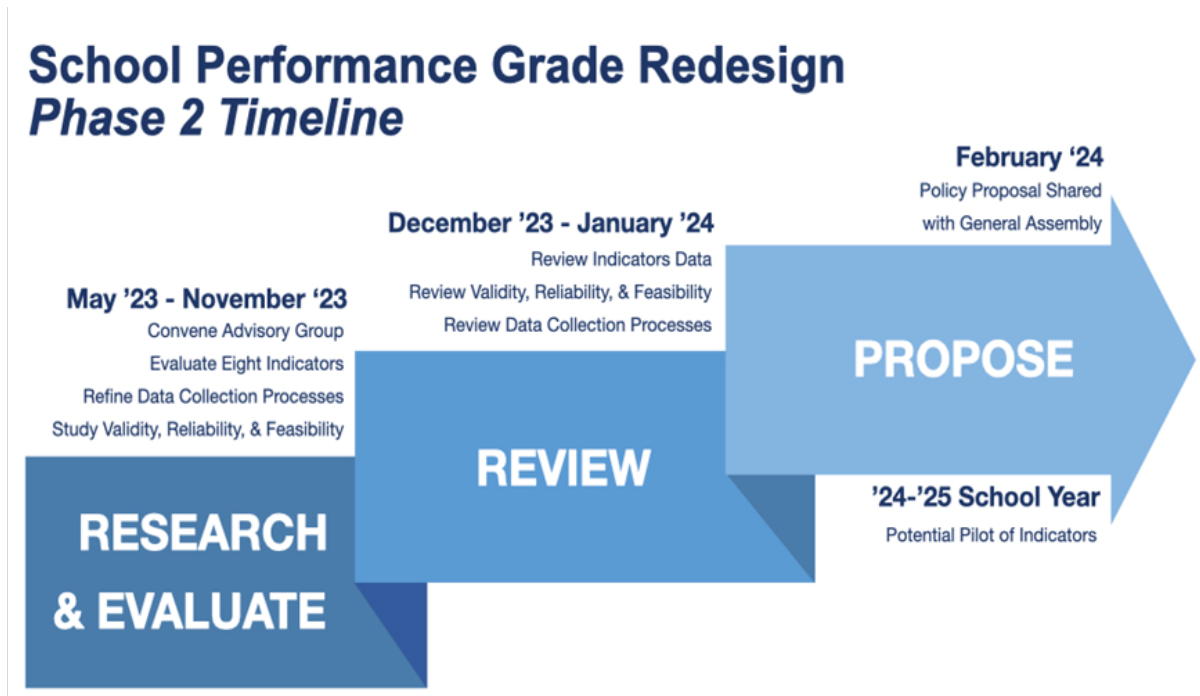


Figure 2: School performance grade redesign phase 2 timeline

Discussions to date have focused on the general value of an indicator as a measure of a school's success in preparing students for success after high school. Forthcoming studies will center on the specifics of an indicator to ensure its potential value to a school's designation, particularly with respect to identifying low-performing schools needing improvement.

Over the next several months, the NCDPI will clearly define each indicator and identify the availability of the required data. Two of the indicators, five-year cohort graduation rate and chronic absenteeism, have at least some available data, but other indicators may require the development of a data collection system and process. Additionally, integral to a thorough study of the indicators are the following considerations:

- Is an indicator valid for its intended uses? When designing an indicator, it is necessary to consider whether the results produced by the indicator accurately represent the underlying performance construct.
- Is an indicator reliable? Reliability is necessary to ensure an indicator is consistently contributing to the overall school performance grade at the school level.
- Is it feasible to collect data on an indicator? The data collection process may require school and district staff to implement new processes and procedures. Typically,

indicators are measured at the student level, so for each measure, each student has to be tagged as having met the expectation or not having met the expectation.

- Is there local capacity to implement an indicator? Similar to feasibility, it is important to consider the capacity of schools to adhere to requirements associated with a new indicator.
- Are indicators fair and accessible for all schools? Though unintentional, some schools may be more equipped to meet the requirements of an indicator than other schools.
- Are there unintended consequences related to an indicator? Indicators send a clear message to schools of what is valued and what merits attention on a day-to-day basis. The inclusion of an indicator in an accountability system should intentionally yield the desired outcomes.
- Are the business rules necessary to implement an indicator clear and reasonable for inclusion in the system?
- Is an indicator usable for federal accountability? Federal laws and regulatory guidance require indicators to meet specific criteria. If not, the U.S. Department of Education may not approve North Carolina's Every Student Succeeds Act state plan.
- Are there additional costs, locally and at the state level, incurred with the inclusion of an indicator? Not only should the costs be identified but whether the cost is beneficial to the overall needs of the schools is a key consideration, particularly for indicators that may have a minimal impact on the accountability results and local decision making.

The studies of the indicators will be designed to address each of the above considerations, and additional considerations may be identified as part of the process. Public school unit leaders have been invited to participate in workgroups for each indicator. This will ensure ongoing engagement of educators in the process of determining the applicability and relevance of the proposed indicators.

Additionally, members of the workgroups will provide feedback and input on the following:

- The value and appropriateness of any current indicators in a new system.
- The structure of a new system, particularly with regard to the weights of the indicators.
- The potential for a state-centered system that is separate from meeting the federal requirements.
- The legislative impact of any changes or new design of an accountability system.

The NCDPI will provide updates on this work to the General Assembly as needed throughout the process, with the possibility of a policy proposal in February 2024.