education sector reports

On Her Majesty's School Inspection Service

By Craig D. Jerald

EDUCATIONSECTOR
www.educationsector.org

ACKNOWLEDGEMENTS

The author would like to thank Her Majesty's Inspector Ceri Morgan for providing invaluable information and insights about the English inspection system, as well as Mr. Morgan and his colleagues at Ofsted for reading a draft of the report to check its accuracy. The author also would like to thank Daria Hall of the Education Trust for offering useful feedback and important perspectives on the evolution of school accountability policies in the United States.

This report was funded by the Stuart Foundation. Education Sector thanks the foundation for its support. The views expressed in the paper are those of the author alone.

ABOUT THE AUTHOR

CRAIG D. JERALD is president of Break the Curve Consulting, which provides technical assistance and strategic advice to organizations working to improve education for all students. He can be reached at (202) 232-5109 or craig@breakthecurve.com.

ABOUT EDUCATION SECTOR

Education Sector is an independent think tank that challenges conventional thinking in education policy. We are a nonprofit, nonpartisan organization committed to achieving measurable impact in education, both by improving existing reform initiatives and by developing new, innovative solutions to our nation's most pressing education problems.

1201 Connecticut Ave., N.W., Suite 850, Washington, D.C. 20036
202.552.2840 • www.educationsector.org

Like many of its American counterparts, Peterhouse Primary School in Norfolk County, England, received some bad news early in 2010. Peterhouse had failed to pass muster under its government's school accountability scheme, and it would need to take special measures to improve. But that is where the similarity ended. As Peterhouse's leaders worked to develop an action plan for improving, they benefited from a resource few, if any, American schools enjoy. Bundled right along with the school's accountability rating came a 14-page narrative report on the school's specific strengths and weaknesses in key areas, such as leadership and classroom teaching, along with a list of top-priority recommendations for tackling problems. With the report in hand, Peterhouse improved rapidly, taking only 14 months to boost its rating substantially.

Peterhouse's inspection report was made possible by a feature of accountability systems common to dozens of countries around the world: an on-site inspection visit. In England, professional inspectors consider standardized test scores when evaluating schools, but they also gather first-hand observational evidence on a variety of other factors before judging a school's overall effectiveness and offering a diagnosis for improvement.

Written in a bracingly frank and direct style, the report left little doubt about why the school had been deemed "inadequate" and how it needed to improve. "Teaching is too often pitched at an inappropriate level as assessment of pupils' attainment is not used sufficiently well to plan effective lessons," wrote the inspection team. "Pupils are not given adequate academic guidance to move their learning on, and the quality of feedback in marking is inconsistent across the school. Pupils' books show that, in some cases, the teachers have low expectations, especially regarding the quality of pupils' written work."[1]

The report even included a letter to the school's students from the lead inspector, saying, "Many of you are not making the progress you are capable of, or attaining high enough standards. We have asked your school to make sure that the work set in lessons challenges you so that you can learn more quickly and reach higher levels. … Your teachers will get extra support, and inspectors will visit your school regularly to see how well you are doing."

Peterhouse's story contrasts sharply with experiences in the United States, where under No Child Left Behind's test-based accountability system many schools spend years progressing through a series of rigid improvement categories. In fact, among 1,200 schools identified for "corrective action" in 2005–06, a full 70 percent were still under an improvement category three years later.[2] Peterhouse's 14-month improvement trajectory is impressive, but it is still only six months ahead of schedule compared with the English average.

NCLB does require states to convene "support teams" to provide an inspection-like review for schools identified for improvement, but those visits come too late to spur swift action, and many schools don't receive them at all. In addition, some states

and districts have experimented with school visits for a variety of other purposes, such as charter school renewal and school accreditation. But no state has attempted to implement a serious inspection system like England's as part of its regular school accountability policies. (See Sidebar, "American Analogues?" on page 3.)

After more than a decade and four years behind schedule, Congress finally seems ready to reauthorize the Elementary and Secondary Education Act, or "fix NCLB."

After more than a decade and four years behind schedule, Congress finally seems ready to reauthorize the Elementary and Secondary Education Act, or "fix NCLB." Critics have complained for years that the law's singular focus on annual test scores offers far too narrow a picture for judging school quality and that its "adequate yearly progress," or AYP, formula is too inflexible to diagnose the strengths and weaknesses of schools. The law's defenders have argued that test scores offer the only sufficiently objective data for accurately judging how well public schools are educating all children and that some standardized formula is necessary to apply comparable criteria across schools.

Now, instead of arguing about what specific kinds of measures and formulas states should be required to use for school accountability, the argument is about whether Congress should mandate any kind of uniform accountability requirements at all. In an about-face that few would have predicted a year ago, House and Senate leaders seem poised to give states great freedom to design their own unique approaches for holding schools accountable.

As they begin to ponder their options for the post-NCLB era, state leaders should take a close look at England's approach to inspections—a method that suggests there are ways to ensure rigor and consistency while not sacrificing diagnosis and feedback. England's example is especially useful because it has recently grappled with several key policy challenges state leaders will undoubtedly face in the post-NCLB era, including how states can design accountability systems that:

1. Judge schools on a broader range of evidence without losing sight of the fundamental importance of student achievement, including standardized test scores.
2. Leverage expert judgment rather than relying solely on spreadsheet formulas, yet still ensure sufficient safeguards against inconsistent or inflated ratings.
3. Achieve a better balance between rigorous evaluative ratings and better diagnostic feedback to help schools improve.

Some states might decide to stick with accountability formulas rather than trying inspections, perhaps adding a few statistical indicators beyond test scores. But the English example suggests that inspections offer a way to make much more nuanced judgments about school performance, provide richer information to parents and the public, offer better formative feedback to schools, inform much more targeted improvement and interventions for low-performing schools, and accelerate timelines for school improvement.

The English Example: Inspection By Ofsted

England was among the first European countries to adopt a modern, standardized system of routine school inspections in the early 1990s.[3] Created by Parliament in 1992, England's Office for Standards in Education, Children's Services and Skills (Ofsted) has supervised all inspections of English schools since 1993, replacing an earlier arrangement under which a small cadre of Her Majesty's Inspectors[4] provided advice to inspectors employed by local school districts.[5] Parliament's intent was to give parents better information about schools and to hold schools more accountable for performance in the wake of 1988 reforms that offered parents greater choice among public schools and schools greater autonomy in their finances.[6]

American Analogues?

Some states and districts already require or encourage school site visits for a variety of purposes, and NCLB even requires states to create "school support teams" to advise failing schools and monitor their progress. In fact, because of the hodgepodge of policies and programs that incorporate visiting teams, the Organization for Economic Cooperation and Development counts the United States among 21 developed nations where "school inspections [are] required as part of [an] accountability system." But the reality falls far short of that claim. No U.S. state or district currently operates a comprehensive system of school inspections quite like England's.

School Accreditation

Some states require or encourage schools to become accredited by one of five regional associations, several of which date back to the 1880s.To become accredited a school must host a team of visiting educators who spend several days reviewing records and facilities, meeting with teachers and administrators, and observing classrooms. However, unlike England's professional inspectors, accreditation team members are volunteers who receive only minimal training, if any, and do not participate in enough visits to build solid expertise in evaluating schools. Schools very rarely "fail" the accreditation process, even if their students have very low achievement or graduation rates, and written accreditation reports are not routinely published.

Charter School Renewal

Some states require charter schools to undergo reviews by visiting teams before their charters can be renewed. Massachusetts consulted with experts familiar with Ofsted's approach in order to model its charter reviews on English inspections, and the state publishes each school's "renewal inspection report" online. However, so far the state only inspects charter schools, and the inspections play no role in regular accountability determinations.

School Support Teams

Federal law requires states to establish "school support teams" to assist schools identified for improvement or corrective action under NCLB. The teams are supposed to "review and analyze all facets of the school's operation," provide advice on improvement strategies, and then monitor the school's progress over time. However, states vary widely in how vigorously they fulfill the requirement, and only a few states, most notably Ohio, conduct reviews anywhere near as robust as English inspections. Ohio's School Improvement Diagnostic Reviews (SIDRs), initiated in 2008, rely on 24 state officials who have extensive training and experience in conducting two-day site visits that resemble English inspections in many ways. SIDR teams follow a standard protocol for collecting evidence to diagnose a school's strengths and weaknesses and make prioritized recommendations, which they present to the school in a "diagnostic report" several weeks later. However, unlike England, Ohio only inspects schools that are first identified as underperforming based on test data, and Ohio does not publish the diagnostic reports online.

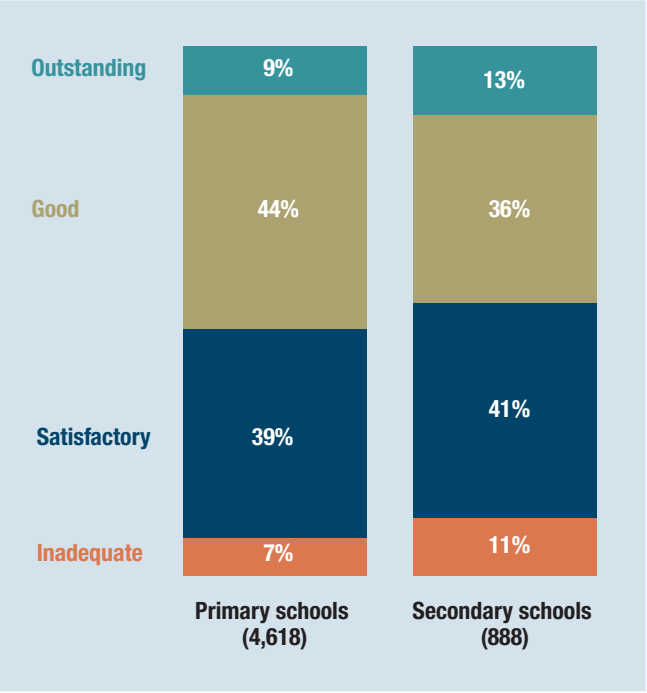
School Quality Reviews

In 2006, New York City contracted with the British-based company Cambridge Education to design and conduct on-site School Quality Reviews as a component of the district's accountability system. The reviews rely on multi-day site visits that resemble Ofsted-style inspections in certain ways, and the first round was conducted by former British headmasters the company brought to the United States. However, rather than judging a school's "overall effectiveness" as does Ofsted, New York City focuses much more narrowly on whether schools are implementing a recommended school improvement process. The major areas of the grading rubric reflect that orientation ("gather and analyze data," "plan and set goals," "align capacity building," "monitor and revise") as do the grades given to schools ("well developed," "proficient," "developing," "underdeveloped"). In 2009, Charlotte-Mecklenburg School District in North Carolina also enlisted Cambridge Education to help design and conduct school quality reviews. Those reviews bore a closer resemblance to English inspections, but the district stopped them last year amid budget cuts.

Rather than operating within the government's Department for Education, Ofsted functions as an external inspectorate reporting directly to Parliament, which grants it the independence to report findings "without fear or favor." After each inspection, Ofsted publishes a report on its website that includes a narrative about the school's strengths and weaknesses and lists priorities for improvement. The report also grades schools on 27 specific dimensions of performance, from "outstanding" to "good" to "satisfactory" to "inadequate." (See Figures 1 and 2.)

Ofsted originally inspected each school every three years. However, in September 2009, the inspectorate

Figure 1. Grades for "Overall Effectiveness" of Schools Inspected During 2009–10



Source: Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office Limited, 2010), Figure 17.

adopted a "proportionate, risk-based approach" that varies the timing of inspections according to each school's past performance. Currently, schools previously judged to be outstanding or good are fully inspected every five years, and those judged satisfactory are inspected every three years, unless an annual risk assessment raises red flags.[7] Inadequate schools are re-inspected within one to two years but also receive more frequent visits from inspectors who monitor their progress in meeting the priorities for improvement. Around 40 percent of satisfactory schools also receive a one-day monitoring visit between inspections. In November 2011, Parliament passed a law exempting outstanding schools from routine inspections starting in 2012. This will enable Ofsted to focus even greater attention on inadequate schools and on satisfactory schools that appear to be "coasting."

Most schools receive one to two days' notice before an inspection, and inspections usually last for two days.[8] Before the visit, the lead inspector conducts a preliminary analysis of available evidence, including student assessment results and the school's own self-evaluation, in order to identify potential "inspection trails." The inspector discusses those emerging themes by phone with the headteacher and develops a working plan for the team's visit.

During the visit, inspectors observe classroom lessons, analyze student work, speak with students and staff members, examine school records, and scrutinize the results of surveys administered to parents and students. But Ofsted's guidance for inspectors clarifies that "while some staff interviews are important to provide context, the main focus should be on observing lessons and gathering other first-hand evidence."[9] Indeed, Ofsted says, "the most important source of evidence is the classroom observation of teaching and the impact it is having on learning" because it informs not only the judgment about the quality of teaching but also key judgments about student outcomes, school leadership, and capacity to improve.

Each inspection team determines the best strategy for observing classroom lessons. In many cases, inspectors conduct shorter observations lasting 25–30 minutes, which allows the team to observe the majority of teachers in primary schools and a substantial minority of teachers in secondary schools. In other cases, inspectors might conduct whole-period observations to investigate certain issues more deeply, or they might shadow a group of students for all or part of the day. In every case, inspectors must find time to provide direct oral feedback to any teacher they observe for 20 minutes or more. According to a study by the U.K.'s National Foundation for Educational Research, teachers generally value the feedback and wish that inspectors could observe even more classrooms for longer chunks of time.[10]

Ofsted says, "the most important source of evidence is the classroom observation of teaching and the impact it is having on learning."

Figure 2. Grades for Primary Schools Inspected During 2009–10

This table shows the percentage of primary schools inspected during 2009–10 judged to be "outstanding," "good," "satisfactory," or "inadequate" on each of the 27 dimensions Ofsted currently grades. Note that in England, the term "attainment" refers to whether students are meeting academic standards, mainly according to their results on standardized tests, rather than completion or dropout rates.

ASPECTS OF THE SCHOOL	Outstanding	Good	Satisfactory	Inadequate
Overall effectiveness				
Overall effectiveness: how good is the school?	9	44	39	7
Outcomes for individuals and groups of pupils	12	42	40	6
The school's capacity for sustained improvement	9	52	35	4
Outcomes: how well are pupils doing taking account of any variation?				
Pupils' achievement and the extent to which they enjoy their learning	8	46	40	6
Pupils' attainment *	7	25	56	13
The quality of pupils' learning and their progress	6	50	39	5
The quality of learning for pupils with special educational needs and/or disabilities and their progress	8	56	33	3
The extent to which pupils feel safe	28	64	7	0
Pupils' behaviour	23	66	11	0
The extent to which pupils adopt healthy lifestyles	25	67	8	0
The extent to which pupils contribute to the school and wider community	21	60	19	0
The extent to which pupils develop workplace and other skills that will contribute to their future economic well-being	8	40	47	5
Pupils' attendance *	10	34	47	9
The extent of pupils' spiritual, moral, social, and cultural development	18	63	18	0
How effective is the provision?				
The quality of teaching	5	52	39	4
The use of assessment to support learning	6	47	43	4
The extent to which the curriculum meets pupils' needs, including, where relevant, through partnerships	11	53	34	2
The effectiveness of care, guidance, and support	32	56	10	2
How effective are leadership and management?				
The effectiveness of leadership and management in embedding ambition and driving improvement	12	50	34	4
The leadership and management of teaching and learning	10	51	35	4
The effectiveness of the governing body in challenging and supporting the school so that weaknesses are tackled decisively and statutory responsibilities met	7	46	42	5
The effectiveness of the school's engagement with parents and carers	18	63	19	0
The effectiveness of partnerships in promoting learning and well-being	20	62	17	1
The effectiveness with which the school promotes equal opportunity and tackles discrimination	14	51	31	3
The effectiveness of safeguarding procedures	15	60	23	2
The effectiveness with which the school promotes community cohesion	7	45	46	2
The effectiveness with which the school deploys resources to achieve value for money	10	44	40	6

* Grades for pupils' attainment and attendance are "high," "above average," "average," and "low."

Source: Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

After the inspectors agree on their final judgments, the lead inspector ensures that the headteacher understands the grades and provides oral feedback on the school's strengths and weaknesses and priorities for improvement. The inspector then immediately drafts the inspection report, which is vetted through an extensive quality assurance process that includes several rounds of supervisory review and editing as well as a check for factual accuracy by the school. Schools generally receive an electronic version within 15 working days, and they have five days to distribute it to parents and guardians before Ofsted publishes the report on its website.

The inspectorate takes particular pains to ensure that reports are written clearly enough that parents can consult them when choosing schools.[11] For example, inspectors are told to avoid "speculation or prediction" and "over-generalization" and not to "overuse phrases such as 'average level.'" Ofsted also ensures the reports are written precisely enough that educators can use them to plan improvements. For example, the guidelines for writing reports specify, "it is not acceptable to simply state that a school should 'improve teaching'; the recommendations should make clear which elements of teaching should be improved." (See Figure 3.)

When a school is judged inadequate in overall effectiveness, Ofsted places it into one of two "categories of concern"—"notice to improve" or "special measures"—depending on the inspectors' judgment about whether school leaders have the capacity to make necessary improvements. Schools lacking sufficient capacity to improve on their own are placed into special measures, giving national and local officials power to intervene in staffing and governance or even, if necessary, to close them. About 230 primary and secondary schools have closed while under special measures since 1993.[12]

In either case, the local district must submit a targeted action plan for improving the inadequate school to Ofsted's head, Her Majesty's Chief Inspector. Inspectors then regularly visit the school to monitor and publicly report on the school's progress in meeting specific priorities for improvement, with schools in special measures receiving more frequent visits than schools given a notice to improve.

FIGURE 3: Ofsted's Guidance for Writing Inspection Reports

- Report unequivocally and avoid expressing judgments as recommendations; for example, inspectors should report "self-evaluation is weak" rather than "self-evaluation needs to be improved."
- Make specific recommendations based on diagnosis of the school's strengths and weaknesses. For example, it is not acceptable to simply state that a school should "improve teaching"; the recommendations should make clear which elements of teaching should be improved and how.
- Make sure the text in all sections explains the grades; wherever possible, they should point the school toward improvement by conveying why a higher grade was not awarded.
- Capture the "big picture" about standards of attainment, learning and progress, and achievement, reporting on these clearly and without excessive detail.
- Avoid speculation or prediction, for example, attempting to predict what the school's examination results will be the next summer or what would result if a particular course of action were to be followed.
- Avoid over-generalization from a specific instance; where relevant, inspectors should refer to the evidence on which judgments are based.
- Make clear judgments, avoiding qualifiers such as "overall" or "however."
- Avoid overuse of phrases such as "average level."
- Make judicious, but not excessive, use of examples and quotations.
- Write clearly, unambiguously, and interestingly for the parent audience, without exaggerating, being over-colloquial, or using jargon.

Source: *Conducting School Inspections: Guidance for Inspecting Schools under Section 5 of the Education Act 2005, from September 2009* (London: Ofsted, April 2011).

Middle Ground: Multiple Measures vs. Test-Based Accountability

Ofsted's current framework requires inspectors to grade schools on 27 dimensions of performance, including such diverse aspects as parent engagement; community cohesion; effective guidance and support; and even "the extent of pupils' spiritual, moral, social, and cultural development."[13] (See Figure 2.) That kind of breadth has earned England accolades from American advocates of multiple measures, who call for accountability systems based on a broader range of evidence.[14] However, given that only one of Ofsted's 27 judgments relates directly to test scores, such breadth is unlikely to appeal to proponents of test-driven accountability in the U.S.

No inspection system can ever completely bridge the deep divide between proponents of multiple measures and defenders of test-based accountability. However, since 2005 Ofsted has been experimenting with ways to emphasize student achievement when grading schools' overall effectiveness without letting test scores drive the judgment deterministically.

English inspection teams begin by making two independent judgments, one regarding students' academic "attainment" and another regarding their "learning and progress." Together, they inform a broader judgment of "pupils' achievement."

Attainment has to do with how well students are meeting the U.K.'s national curriculum standards. It is primarily based on published test results, but also considers students' current work. Inspectors begin by downloading an 80-page report from an electronic data warehouse called RAISEonline, which provides an analysis of students' test performance in "key stage" grade levels. They examine the pattern of assessment results over the last three years and for different groups of students in the school, including low-income and minority children. To be sure those historical data accurately reflect students' *current* levels of academic attainment, inspectors also look at more recent evidence—assessments given by the school and coursework assigned by teachers—and take into account the school's own standards for grading students. Perhaps low test scores for one group of students in a given year were an isolated occurrence. Perhaps a new headteacher has raised expectations, or a new professional development initiative is bearing fruit and students are attaining higher academic standards since the tests were administered. "The published data give you a steer on the inspection but don't drive the final judgments," says Her Majesty's Inspector Ceri Morgan.[15]

To judge learning and progress, inspectors consider a statistical "contextual value-added," or CVA, measure of student growth, also provided by RAISEonline, but once again check those historical data against current evidence.[16] Inspectors also take into account their own first-hand observations of how well students are acquiring knowledge and skills and developing as learners, as well as how enthusiastic and engaged students appear to be in their lessons. "The framework sets value-added measures in the context of *actual learning* in the school," explains Morgan. "The overall judgment is determined by the full range and weight of evidence about the quality of learning, past progress, and current progress."

Finally, to decide on a grade for student achievement, inspectors weigh the judgment for academic attainment against the judgment for learning and progress.

Finally, to decide on a grade for student achievement, inspectors weigh the judgment for academic attainment against the judgment for learning and progress. Ofsted's framework provides specific guidance on how to do that. (See Figure 4.) For example, inspectors may decide to grade overall achievement as good even when students' academic attainment is low if they find "convincing evidence that outstanding learning and progress are helping pupils' attainment to improve strongly." On the other hand, high academic attainment does not guarantee that a school will be judged to have outstanding achievement, especially if students' *progress over time* is only satisfactory.

Figure 4. Ofsted's Grade Descriptors for Judgments Related to Student Achievement and Growth*

ACADEMIC ATTAINMENT	LEARNING AND PROGRESS	ACHIEVEMENT OVERALL
High (1)	**Outstanding (1)**	**Outstanding (1)**
A large majority of attainment indicators for the final key stage [exams] over the last three years have been significantly above average as indicated in RAISEonline. Other data and the pupils' current work indicate that attainment is high. Pupils' attainment in key subjects and the attainment of sizeable groups of pupils are significantly above average.	The pupils acquire knowledge, develop understanding and learn and practice skills exceptionally well. Pupils demonstrate excellent concentration and are rarely off task, even in extended periods without direction from an adult. They have developed resilience when tackling challenging activities in a range of subjects. Their keenness and commitment to succeed in all aspects of school life and ability to grasp opportunities to extend and improve their learning are exceptional. Progress is at least good in each key stage, key subjects, and for different groups and is exemplary in some.	Achievement is likely to be outstanding when: • **attainment** is above average or high and **learning and progress** are outstanding or • **attainment** is high and **learning and progress** are good.
Above Average (2)	**Good (2)**	**Good (2)**
A majority of attainment indicators for the final key stage [exams] over the last three years have been significantly above average, as indicated in RAISEonline. Other data and the pupils' current work indicate that attainment is above average. Instances of significantly below average attainment, including in key subjects and for sizeable groups of pupils, are rare and there is a pattern of improvement.	The pupils acquire knowledge, develop understanding, and learn and practice skills well. The pupils are keen to do well, apply themselves diligently in lessons, and work at a good pace. They seek to produce their best work and are usually interested and enthusiastic about their learning in a range of subjects. A very large majority of groups of pupils make at least good progress, and some may make outstanding progress, with nothing that is inadequate.	Achievement is likely to be good when: • **attainment** is above average and **learning and progress** are good or • **attainment** is average and **learning and progress** are good or outstanding or • **attainment** is low but there is convincing evidence that outstanding **learning and progress** are helping pupils' attainment to improve strongly. On rare occasions, learning and progress may be good, but outstanding for some groups of pupils and improving overall.
Average (3)	**Satisfactory (3)**	**Satisfactory (3)**
Generally, attainment indicators for the final key stage [exams] over the last three years have not been significantly below average overall, in all key subjects and for different groups of pupils, as shown by indicators in RAISEonline. Other data and pupils' current work indicate that attainment is average.	The extent to which pupils acquire knowledge, develop understanding, and learn and practice skills is at least satisfactory. Most pupils work effectively in a range of subjects when provided with appropriate tasks and guidance but lack confidence in improving the quality of their work. They generally work steadily and occasionally show high levels of enthusiasm and interest. The pupils make the progress expected given their starting points, and some, although not the majority, may make good progress. Progress is inadequate in no major respect (for example, a key stage or particular groups of pupils), and may be good in some respects.	Achievement is likely to be satisfactory when: • **attainment** is average, above average, or high, and **learning and progress** are satisfactory or • **attainment** is low but improving strongly and **learning and progress** are good. Or, there is convincing evidence that learning and progress are satisfactory but improving securely and quickly.

ACADEMIC ATTAINMENT	LEARNING AND PROGRESS	ACHIEVEMENT OVERALL
Low (4)	**Inadequate (4)**	**Inadequate (4)**
• The general pattern of overall attainment indicators for the final key stage [exams] over the last three years has been significantly below average, as indicated in RAISEonline. This includes consideration of National Challenge benchmarks. Other data and the pupils' current work indicate that attainment is low or • The general pattern of attainment indicators for the final key stage [exams] over the last three years for one or more key subjects or sizeable groups of pupils has been significantly below average, as indicated in RAISEonline. Other data and the pupils' current work indicate that attainment is low.	• The extent to which pupils acquire knowledge, develop understanding, and learn and practice skills is inadequate or • Too many pupils fail to work effectively unless closely directed by an adult and give up easily. Pupils do not enjoy the activities provided, which is reflected in poor completion of tasks across a range of subjects or • Pupils, or particular groups of pupils, make too little progress in one or more key stages.	Achievement is likely to be inadequate when: • **learning and progress** are inadequate or • **attainment** is low and shows little sign of improvement, and **learning and progress** are no better than satisfactory with little or no evidence of improvement.

***Note:** The figure shows Ofsted's grade descriptors from September 2009 through December 2011. This will be replaced with a revised version in 2012.

Source: *The Evaluation Schedule for Schools: Guidance and Grade Descriptors for Inspecting Schools in England under Section 5 of the Education Act 2005, from September 2009* (London: Ofsted, April 2011).

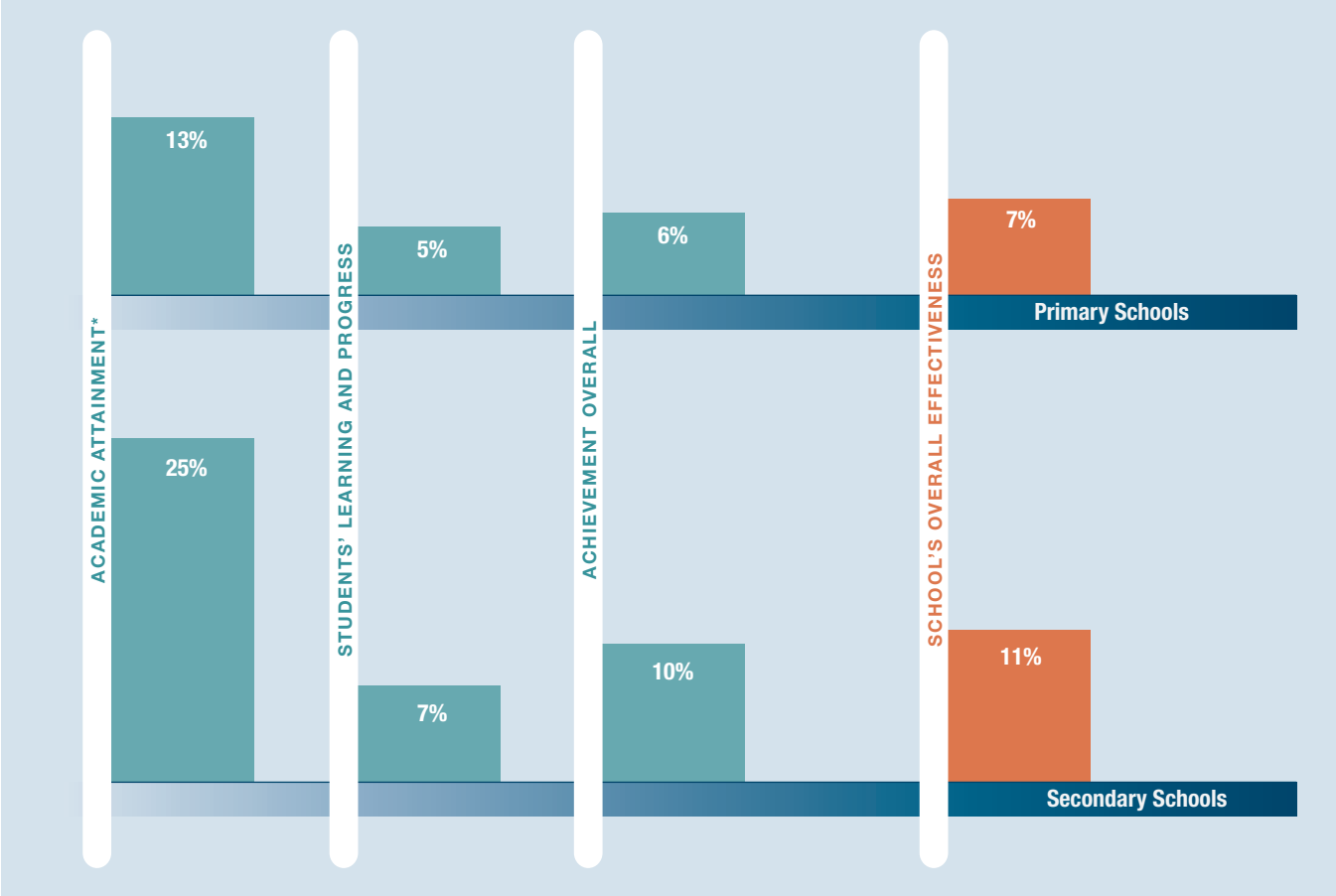
The framework clarifies that, "if the school is judged to be inadequate in [achievement], its overall effectiveness is also likely to be judged inadequate."[17] Because of that language, the grade for achievement is called a "limiting judgment" that must be specially considered before inspectors judge a school's overall effectiveness. However, the key word is "likely," meaning that even though inspectors must pause to give student achievement special consideration before making their final judgment about a school's overall effectiveness, the decision is not mechanistic.

In this way, Ofsted has tried to strike a balance between paying serious attention to student achievement, including standardized test scores, while taking care not to transform the inspection system into one in which strict rules and formulas replace expert judgments about schools based on multiple measures. Inspectors may decide that a school with inadequate achievement is nevertheless satisfactory overall, but only if the recorded evidence from the inspection supports that decision. In 93 percent of inspections conducted during 2009–10, the judgment of the school's overall effectiveness matched the judgment for student achievement.[18]

Although staunch advocates of test-based accountability might consider even that correlation too weak, Ofsted's increased attention to student achievement sometimes raises fears that test scores will come to play too overwhelming a role in inspection results.[19] In 2010, the leader of the British association of secondary school headteachers told a reporter for *The Independent* that "lowish raw results (in exams) will automatically pull down the judgment on achievement and the domino effect will pull down the judgment on the whole school."[20] A journalist for the U.K.'s *Times Educational Supplement* even accused Ofsted of "overseeing the tyranny of testing" in 2008.[21]

Recent inspection results, however, suggest those fears are largely misplaced. While inspectors judged 13 percent of primary schools to have low academic attainment in 2009–10, only 6 percent were judged to have inadequate student achievement and only 7 percent inadequate effectiveness overall. (See Figure 5.) In fact, among all schools inspected in 2009–10, more than a third earned a higher grade for overall effectiveness than for academic attainment.[22]

Figure 5. Percentage of Schools Inspected in 2009–10 That Were Judged Inadequate Overall and Inadequate in Areas Related to Student Achievement



* The lowest grade for attainment is "low," which corresponds to "inadequate" on Ofsted's four-point scale.

Source: Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

Consider Peterhouse, the Norfolk County school judged inadequate and placed into special measures in March 2010. By the time of its next full inspection, in May 2011, students' academic attainment was still below average and earned a grade of "low" from inspectors. However, the headteacher, Martin Scott, had moved decisively to address the problems with classroom teaching that were spelled out in the previous inspection report, by adopting new ways to assess student progress and plan instruction, providing focused professional development, and tapping a new deputy headmaster to run an enhanced system of lesson observations. By May 2011, inspectors judged the quality of teaching at Peterhouse to have become not merely satisfactory but good.

As a result of those improvements, "pupils' low attainment on entry no longer inhibits their learning," Her Majesty's Inspector Ian Seath wrote in the inspection report. "Progress is increasing quickly in all year groups. In some cases learning and progress are proceeding at a much faster rate than would be expected." Inspectors now judged students' learning and progress to be good, as well as the school's capacity to sustain and continue the improvements. Inspectors also judged the school's overall effectiveness to be satisfactory and removed Peterhouse from special measures.

Should Peterhouse have remained on the list of "failing schools" because academic attainment was still low? This is the kind of question state leaders in

the U.S. are likely to face in the post-NCLB era. At the very least, England's inspections suggest it is possible to envision accountability policies that pay close attention to student learning, including test scores, yet permit more nuanced judgments about schools' overall effectiveness and priorities for improvement.

A Sharper Focus

England is not immune to debates about multiple measures, and Ofsted continues to revise its inspection policies. In September 2011, the inspectorate undertook a major overhaul of its framework in response to suggestions from the newly elected coalition government about the very feature American devotees of "multiple measures" so admire—its breadth. "I think there are areas where Ofsted have been asked to inspect, like 'community cohesion' … which are entirely peripheral," Education Secretary Michael Gove told *The Guardian* in January. "Schools are there in order to ensure that pupils are in a safe environment and can get on and learn, and we should strip Ofsted down to its essentials so that it can get on with that."[23]

Starting next year, inspectors will make only four graded judgments before determining a school's overall effectiveness: student achievement, the quality of teaching, students' behavior and safety, and the leadership and management of the school. Ofsted believes the sharper focus will free inspectors "to look more closely at what matters most in schools," offering extra time to observe teachers in classrooms and engage with students, including, for example, listening to younger students read aloud.

But the inspectorate is not entirely discarding every other dimension. For example, inspectors will still report on, but not specifically grade, "pupils' spiritual, moral, social, and cultural development," and they will consider the quality of parent engagement when judging a school's leadership and management. Inspectors also will continue to judge "community cohesion" because it fulfills a separate statutory requirement, but they will grade that dimension only as a "yes" or "no" rather than on the full four-point scale.

Beyond Spreadsheets: Leveraging Expert Judgment For School Accountability

American policymakers could certainly create accountability systems that incorporate multiple measures *without* adding inspections, simply by tweaking accountability formulas to include other variables in addition to test scores. That was exactly what the California Senate proposed in a bill Governor Edmund Brown vetoed in October 2011. Brown liked the idea of multiple measures but wanted legislators to go further. "SB 547 … does allude to student excitement and creativity, but does not take these qualities seriously because they can't be placed in a data stream," he complained. "Lost in the bill's turgid mandates is any recognition that *quality* is fundamentally different from *quantity*."[24]

For the past 10 years, in addition to relying heavily on test scores, states have ceded judgments about school effectiveness to mathematical formulas programmed into computers.

Brown's letter points to another source of discontent with school accountability systems under NCLB. For the past 10 years, in addition to relying heavily on test scores, states have ceded judgments about school effectiveness to mathematical formulas programmed into computers. Under NCLB, states use an AYP formula to decide whether a school has met minimum performance targets. When a school fails to make AYP, states use a second, simpler formula for placing it into one of three categories for targeted action. Schools that fail to make AYP for two years are placed into "improvement," for four years into "corrective action," and for six years into "restructuring."

In an inspection system, trained professionals *weigh* the evidence for judging a school rather than simply plugging it into a *weighted* formula. And in England,

Ofsted relies on inspectors' *judgment* about whether school leaders have the capacity to make necessary improvements to determine what category to put failing schools into. That judgment is reviewed by a group of Her Majesty's Inspectors who serve on Ofsted's Schools Causing Concern Team.

Of course, relying on human judgment rather than strict rules and formulas can carry risks. Formulas are entirely objective, and spreadsheets consistently apply whatever rules are programmed into them. What if humans apply expectations for performance inconsistently across schools? What if they allow subjectivity to cloud their judgments? What if they fall prey to the "soft bigotry of low expectations" and judge high-poverty schools more leniently than affluent ones?

Successful inspection systems minimize these threats by taking steps to ensure that judgments are guided by common standards, informed by rigorous training, and steeped in professional expertise. For an inspection system to produce fair, reliable, and credible judgments about schools, policymakers must give careful consideration to *who* will do the judging. In England and other countries, inspectors are paid professionals who are selectively recruited and intensively trained to judge schools against a set of common standards.

In England, some inspections are conducted by Her Majesty's Inspectors (HMIs), who are appointed to permanent positions with Ofsted. But the majority are conducted by Additional Inspectors (AIs) employed by firms that win competitive contracts to supplement the inspectorate's workforce. To manage the current proportionate system of inspections for schools, Ofsted employs about 250 HMIs and contracts with three "inspection service providers" that together supply about 1,600 AIs.[25]

"Ofsted recruits individuals who have both breadth and depth of experience," says HMI Ceri Morgan. "For example, many have experience as headteachers—sometimes having led several schools, each of them successful—and also offer a specialization beyond school leadership." Hiring can take up to a year from the time Ofsted advertises an opening because the inspectorate conducts extensive background checks and applicants complete a series of interviews, presentations, and performance tasks.

"Ofsted recruits individuals who have both breadth and depth of experience."
—HMI Ceri Morgan

Morgan's own background is fairly typical. Before being appointed an HMI, he had successfully led two different schools as headteacher, advised three local school districts on improvement strategies, taught at the University of Warwick for six years, authored curriculum materials and articles in peer-reviewed journals, and acquired a subject specialization in mathematics. HMIs often take on a number of duties at the inspectorate in addition to inspecting schools. For example, Morgan has served on Ofsted's Challenge and Analysis Team, which reviews trends and analyzes inspection outcomes, as well as the inspectorate's Schools Causing Concern Team and International Team.

The three inspection service providers also recruit individuals who have a successful track record in education, and Ofsted uses two strategies to ensure that AIs deliver high-quality judgments. First, it requires the firms to provide extensive initial training followed by ongoing professional development. Firms must describe their proposed training and professional development packages in detail when bidding for contracts.[26] Training provided by the current three contractors includes up to seven days of face-to-face sessions plus several days spent shadowing a team during a live inspection.[27]

Second, HMIs act as a kind of top tier for quality assurance. Before an AI can lead an inspection team, an HMI must certify that he or she is ready to do so by observing the AI's performance during a live inspection. HMIs also review and edit draft inspection reports written by AIs, along with the evidence forms from a sample of inspections.[28] "We can say to inspectors, 'you judged that school satisfactory, but the evidence does not appear to match the published descriptors for that grade; tell us why,'" Morgan explains. "There is often a reason, because these of course are expert professionals in their own right who are judging direct observational evidence."

Apart from those strategies, says Morgan, "the thing that I think secures a high level of consistency in the judgments is that we publish detailed grade descriptors." Ofsted's framework describes the kinds of evidence inspectors should consider and includes descriptions of performance for each level on the four-tiered grading scale (what Americans would call "rubrics") for *every one* of the separate judgments inspectors must make. (See Figure 6.)

Even so, Ofsted emphasizes that inspectors ultimately must apply their own expert judgment in collecting and weighing the evidence for evaluating schools. For example, according to Ofsted's guidance on conducting inspections for schools, "inspectors should use professional judgment to decide where to place the emphasis in evidence gathering, and much will depend on the key inspection issues and the context of the school."[29]

Figure 6. Ofsted's Grade Descriptors for Judging the Quality of Teaching*

Outstanding (1)	Teaching is at least good and much is outstanding, with the result that the pupils are making exceptional progress. It is highly effective in inspiring pupils and ensuring that they learn extremely well. Excellent subject knowledge is applied consistently to challenge and inspire pupils. Resources, including new technology, make a marked contribution to the quality of learning, as does the precisely targeted support provided by other adults. Teachers and other adults are acutely aware of their pupils' capabilities and of their prior learning and understanding, and plan very effectively to build on these. Marking and dialogue between teachers, other adults and pupils are consistently of a very high quality. Pupils understand in detail how to improve their work and are consistently supported in doing so. Teachers systematically and effectively check pupils' understanding throughout lessons, anticipating where they may need to intervene and doing so with striking impact on the quality of learning.
Good (2)	The teaching is consistently effective in ensuring that pupils are motivated and engaged. The great majority of teaching is securing good progress and learning. Teachers generally have strong subject knowledge, which enthuses and challenges most pupils and contributes to their good progress. Good and imaginative use is made of resources, including new technology to enhance learning. Other adults' support is well focused and makes a significant contribution to the quality of learning. As a result of good assessment procedures, teachers and other adults plan well to meet the needs of all pupils. Pupils are provided with detailed feedback, both orally and through marking. They know how well they have done, and can discuss what they need to do to sustain good progress. Teachers listen to, observe, and question groups of pupils during lessons in order to reshape tasks and explanations to improve learning.
Satisfactory (3)	Teaching may be good in some respects, and there are no endemic inadequacies in particular subjects or across year groups. Pupils show interest in their work and are making progress that is broadly in line with their capabilities. Teachers' subject knowledge is secure. Adequate use is made of a range of resources, including new technology, to support learning. Support provided by other adults is effectively deployed. Teaching ensures that pupils are generally engaged by their work and little time is wasted. Regular and accurate assessment informs planning, which generally meets the needs of all groups of pupils. Pupils are informed about their progress and how to improve through marking and dialogue with adults. Teachers monitor pupils' work during lessons, pick up general misconceptions, and adjust their plans accordingly to support learning.
Inadequate (4)	• Expectations are inappropriate. Too many lessons are barely satisfactory or are inadequate, and teaching fails to promote the pupils' learning, progress, or enjoyment. or • Assessment takes too little account of the pupils' prior learning or their understanding of tasks and is not used effectively to help them improve.

***Note:** The figure shows Ofsted's grade descriptors for judging the quality of teaching from September 2009 through December 2011. This will be replaced with a revised version in 2012.

Source: *The Evaluation Schedule for Schools: Guidance and Grade Descriptors for Inspecting Schools in England under Section 5 of the Education Act 2005, from September 2009* (London: Ofsted, April 2011).

Any successful inspection system will leave a certain amount of "wiggle room" for judging schools that American proponents of test-driven accountability might find disconcerting.[30] For example, in 2009–10, English inspectors judged about 50 primary schools and 20 secondary schools to be *outstanding* in overall effectiveness despite having only "average" levels of attainment. Because inspectors collected a rich variety of first-hand evidence about them, Her Majesty's Chief Inspector was able to provide a compelling description of this small group of schools in her annual report to Parliament:

> *"Typically, their pupils make good or outstanding progress from their low attainment at entry. In helping their pupils to make such progress, the schools overcome a range of barriers to learning to secure a strong trajectory of improvement. These schools often have higher than average proportions of children from a deprived background or with special educational needs. The schools tend to be characterized by ambitious and self-critical leadership. Leaders understand their school's strengths and weaknesses precisely and know how to bring about improvement; they provide outstanding support and care for individual pupils, which enable them to thrive, and they develop a curriculum which engages pupils in challenging, relevant and enjoyable learning."*[31]

Even after nearly 20 years of implementing a comprehensive system of school inspections, England continues to seek the right mixture of consistency and flexibility for evaluating schools. For example, the House of Commons Education Committee recently argued that Ofsted's new, more sharply focused framework should obviate any further need to consider student achievement a "limiting judgment" when grading a school's overall effectiveness.[32] That would free inspectors from an aspect of the current framework many considered to be overly restrictive.

The coalition government's response strikes at the heart of the policy challenge. "We want inspectors to have space to make professional judgments about the performance of individual schools," the government wrote. "Equally, we appreciate the need for there to be some consistency in the inspection approach, so that schools know where they stand. Achieving the right balance between these two aspects will be a key consideration for Ofsted as it develops the new framework."[33]

The coalition government's response strikes at the heart of the policy challenge. "We want inspectors to have space to make professional judgments about the performance of individual schools," the government wrote.

Diagnostics and Feedback: Balancing Rigorous Ratings With Support For Improvement

The three inspectors who judged Peterhouse Primary School in Norfolk County to be inadequate in March 2010 faced a difficult decision. Should the school be given a notice to improve and receive a one-day check-up visit (formally known as a "monitoring inspection") before its next full inspection? Or should Peterhouse be placed into special measures and receive up to three monitoring visits a year until it improved enough to be judged at least satisfactory? (See Figure 7.)

In either case, Norfolk County Schools officials would then have 10 working days to submit an action plan for improving Peterhouse to Ofsted's head, Her Majesty's Chief Inspector. Their plan would need to be tailored to the particular strengths and weaknesses described in the inspection report and target the specific priorities for improvement listed in it.[34] But placing Peterhouse into special measures also would prohibit the school's headteacher from hiring newly qualified teachers without permission from an Ofsted inspector and allow local officials to intervene even more directly in its staffing and governance. Moreover, if Peterhouse failed to improve rapidly enough, local and national officials would have the legal authority to consider closing it entirely.

Figure 7. Ofsted's Categories of Concern for Inadequate Schools

	Subject to "Special Measures"	Given a "Notice to Improve"
How is the determination made?	School is judged to have inadequate *overall effectiveness* and inadequate *capacity to improve*	School is judged to have inadequate *overall effectiveness* but satisfactory *capacity to improve*
How are action plans developed?	Ofsted invites the headteacher and a district representative to attend a school improvement seminar; the school must amend its improvement plan; the local district must submit an action plan to Her Majesty's Chief Inspector within 10 working days after the inspection report is published	Ofsted invites the headteacher and a district representative to attend a school improvement seminar; the school must amend its improvement plan; the local district must submit an action plan to Her Majesty's Chief Inspector within 10 working days after the inspection report is published
Are there any automatic restrictions on staffing?	Yes, the school is prohibited from hiring newly qualified teachers without written permission from Ofsted's lead inspector assigned to monitor the school	No
Are schools subject to other interventions by national or local authorities?	Yes, the local district may intervene in the staffing and governance of the school, require it to partner with an outstanding school, or close it; the Secretary of State may close the school	No, however an education bill before Parliament would grant the Secretary of State power to close schools in this category
When and how often are monitoring inspections conducted?	Ofsted conducts periodic monitoring inspections about three times per year beginning four to six months after the school is placed into special measures; Ofsted may conduct up to five monitoring inspections over two years unless the school is removed from special measures	Ofsted conducts one monitoring inspection in six to eight months
Who receives the monitoring report?	Ofsted publishes the monitoring report online, sends it to the headteacher, and copies the Secretary of State and the appropriate local official	Ofsted publishes the monitoring report online, sends it to the headteacher, and copies the Secretary of State and the appropriate local official
When does the next full inspection occur?	If a monitoring inspection finds the school to be satisfactory in overall effectiveness and capacity to improve, the visit counts as a full inspection; Ofsted typically will re-inspect the school in 24 to 28 months	The school will be re-inspected in 12 to 16 months, though the timing can vary based on the results of the monitoring inspection
How many primary and secondary schools inspected during 2009–10 were placed into each category?	213 (3.9%)	230 (4.2%)
How many primary and secondary schools exited the category in 2009–10?	114 (15 were judged good; 96 satisfactory; 2 given a notice to improve; and 1 was closed)	136 (1 was judged outstanding; 18 good; 103 satisfactory; and 16 placed into special measures)
How many primary and secondary schools were in each category as of April 2011?	302	217

Source: Information compiled by author from various sources on Ofsted's website, http://www.ofsted.gov.uk/

The decision would depend on the inspectors' judgment about Peterhouse's capacity to make sustained improvement. Every inspection team grades every school's capacity for improvement based on a common rubric in the inspection framework, but that grade takes on special importance when inspectors decide a school is inadequate. Much goes into the judgment, but inspectors take special consideration of whether the school has been honest and accurate in evaluating its own performance and whether school leaders seem to have the ability and support to drive significant changes.

In Peterhouse's case, the judgment was especially nuanced because headteacher Martin Scott had begun to make some headway toward improving the school since taking the reins a year earlier. "The headteacher and deputy headteachers have quickly gained a good understanding of the school through detailed and accurate evaluation of its strengths and weaknesses," the inspectors noted. Scott and his deputy already had raised teachers' awareness of the need for change and begun to support their efforts to improve instruction.

However, other members of the leadership team lacked "the breadth of experience and levels of expertise to support the deputy and headteacher in ensuring that improvements are made quickly enough," the inspectors determined, especially given the alarming shortcomings in teaching that inspectors had seen in many classrooms. As a result, the inspectors judged that Peterhouse lacked satisfactory capacity to make rapid progress in remedying the weaknesses they had documented, and Ofsted placed the school into special measures.

That swift process contrasts starkly with what happens in the U.S., where schools are placed into "corrective action" only after failing to exit "school improvement" for two years…

That swift process contrasts starkly with what happens in the U.S., where schools are placed into "corrective action" only after failing to exit "school improvement" for two years and placed into "restructuring" only after failing to exit corrective action for several more years. Moreover, because English inspection reports provide a sharp diagnosis of each school's strengths and weaknesses along with clear priorities for improvement, the local district can draft an action plan within 10 working days. NCLB gives schools three months to draft a plan after being identified for improvement.

The reports also provide useful guidance to school staff members—the parties ultimately responsible for making improvements. Peterhouse was told it would need to "improve the quality of teaching by eradicating inadequate teaching and raising the proportion of good teaching."[35] Because Ofsted publishes a rubric that includes clear descriptors of "inadequate" and "good" teaching, that recommendation was a measurable goal, not just a vague exhortation. (See Figure 6.) Inspection reports call attention to *school practices* that inhibit student progress, making it more difficult for educators to delay action by attributing poor outcomes to "external factors" beyond their control.

As a result, Ofsted expects schools under special measures to take swift action to improve. Based on a recent study of schools exiting special measures, the inspectorate has concluded that too many "wait until the first monitoring visit and so three to six months are lost." In response, "Ofsted is currently reviewing its own role. … There may be advantage in the first monitoring visit being much sooner and perhaps subsuming the school improvement seminar."[36] In contrast, although NCLB putatively requires schools under improvement to implement their plans "expeditiously," it actually allows them to wait as long as the beginning of the next full school year before taking action.[37]

In addition, when Ofsted places a school into special measures, the inspectorate appoints an HMI to take the lead in monitoring and reporting on its progress until it exits the category. The lead inspector visits the school once per term, typically enlisting different colleagues each time to provide fresh insights. After each visit, the HMI writes a letter evaluating the school's progress, both overall and in dealing with

each of the priorities for improvement listed in the last full inspection report, and Ofsted publishes the letter on its website.

Monitoring of struggling schools in the U.S. can only be characterized as lax by comparison. "It was only in 2010 that the U.S. Department of Education began requiring states to report status of schools 'in improvement,'" the Washington-based Institute for a Competitive Workforce lamented in February 2011. "Without this information, it has not been clear how many new schools appear on the list of schools 'in need of improvement' each year and how many schools have improved enough to sufficiently exit the list altogether. It's not even clear whether—and to what degree—schools have done what the law requires."[38]

Ofsted promotes a level of public transparency and accountability for improvement efforts completely lacking in the U.S.

By publishing the monitoring letters on its website, Ofsted promotes a level of public transparency and accountability for improvement efforts completely lacking in the U.S. Consider a letter that Alan Armstrong, chair of the interim board of The Misbourne secondary school in southeast England, wrote to parents following a monitoring visit in March. "It is clear that the school has not made the progress it should have," Armstrong acknowledged. "We have moved to secure Mr. Robert Preston and Mr. Graham Parker as consultant Heads. … Steve Anderson, the Parent Champion, will shortly be arranging further Parent Forums to discuss the Ofsted visit and report back on how the school is tackling the issues raised."[39]

Similarly, Peterhouse benefited from the "progress grades" HMI Ian Seath gave during each of the two monitoring inspections he conducted before removing the school from special measures. (See Figure 8.) His published letters also provided crisp narrative evaluations of Peterhouse's progress in addressing specific priorities. For example, after his first visit in September 2010, Seath observed that the school was now "systematically evaluating its teaching and learning through the lesson observation system." As a result, Peterhouse now had "an accurate view of its own strengths and weaknesses in this area and will shortly be introducing a system to place more emphasis on learning and attainment in those lessons observed."[40]

Peterhouse "graduated" from special measures in an unusually short period of time. An Ofsted analysis of primary schools emerging from special measures in 2009–10 found that they took an average of 20 months and required three or four monitoring visits before reaching satisfactory or better effectiveness.[41] Even so, that average compares very favorably with the fate of many similar schools in the U.S. Among 1,200 schools for which data are available, 70 percent of schools identified for corrective action in 2005–06 were still identified for improvement, corrective action, or restructuring three years later.[42]

An External Function

An inspection system can provide sharp diagnoses to inform planning and interventions for struggling schools and, given adequate resources, remarkable capacity to closely monitor and report on their progress. But because England inspects all schools for summative purposes, the system also provides every school with formative feedback to support ongoing improvement efforts. Regardless of the grade for overall effectiveness, Ofsted's reports always include a list of recommended priorities for improvement. A study by the U.K.'s National Foundation for Educational Research found that, "The inspection process was generally perceived as contributing to school improvement and many schools also reflected that the inspection report had provided an impetus to drive forward progress."[43]

In addition, Ofsted has been able to use cost savings from less-frequent inspections of outstanding and good schools to pay greater attention to satisfactory schools. Since 2009, Ofsted has conducted monitoring visits to about 40 percent of satisfactory schools between 12 to 24 months following their last full inspections, targeting those "that would benefit most from further support and challenge." To make that determination, Ofsted considers how inspectors judged a school's capacity to improve; whether they

Figure 8. Peterhouse Primary School: Priorities for Improvement and Grades for Progress While Under Special Measures

	First Monitoring Inspection: September 30, 2010	Second Monitoring Inspection: January 21, 2011
Progress since being subject to special measures	**Satisfactory**	**Good**
Progress since last monitoring inspection	**(n/a)**	**Good**
Priorities for Improving Achievement		
Accelerate pupils' progress across the school and raise attainment in English and mathematics … by: • setting and sharing accurate targets for pupils based on accurate assessments • providing all students with access to good learning opportunities	**Satisfactory**	**Good**
• improving attendance	**Satisfactory**	**Outstanding**
Priorities for Improving Teaching		
Improve the quality and effectiveness of teaching by: • eradicating inadequate teaching and raising the proportion of good teaching • raising pupils' expectations • matching what is taught to the ages of pupils • using assessment to effectively plan lessons • improving marking	**Satisfactory**	**Good**
Priorities for Improving Leadership and Management		
Build the school's capacity to improve and support the headteacher by: • developing leadership expertise across the school • holding staff to account for learning and progress in their classes • ensuring that governors evaluate the effectiveness of strategies for improvement	**Satisfactory**	**Good**

Source: Ian Seath, *Special Measures: Monitoring Inspection of Peterhouse Primary School* (London: Ofsted, September 30, 2010); Ian Seath, *Special Measures: Monitoring Inspection of Peterhouse Primary School* (London: Ofsted, January 21, 2011).

.

judged the school inadequate in any area; and their judgments about students' attainment, progress, and attendance.[44]

The monitoring visits to satisfactory schools last for one day, and the school is given one day's notice before the inspection team arrives. Inspectors examine improvements the school has made in priority areas, as well as whether leaders are building better capacity to drive and sustain improvements so the school is better positioned to be judged good or outstanding during the next full inspection. After providing the headteacher with oral feedback, the lead inspector drafts a short letter that grades the school from outstanding to inadequate on those two key dimensions, and Ofsted publishes the letter on its website.[45]

"We were concerned about the number of children in schools that had consistently been graded satisfactory and never broken through to good," explains HMI Ceri Morgan. At the same time, he says, "Schools welcome the visits because they see them as more developmental than 'inspectorial,' and a

good indicator as to progress between the previous full inspection and the next inspection coming up."

However, finding and communicating the appropriate balance between rigorous evaluation and support for improvement can be tricky. The House of Commons Education Committee recently urged Ofsted to provide more clarity on the matter because of confusion among educators and the public.[46] Ofsted has since emphasized that the inspectorate primarily fulfills an external evaluative function. The local district and the school must be responsible for creating action plans, forging strategic partnerships, and securing necessary resources.

For one, Ofsted does not have the financial or human resources to provide extensive technical assistance to schools. Just as important, doing so could undermine inspectors' ability to provide external, objective evaluations of schools' performance and progress. If Ofsted became a partner in a school's improvement initiatives, the inspectorate could then be grading *its own advice,* as well as the school's progress, in the monitoring reports it publishes. Inspectors grade tangible progress rather than effort, and that would be difficult to do if the inspectorate provided direct technical assistance.

Consider HMI Linda Rockey's October 18, 2010, monitoring report for Field View Primary School in England's West Midlands. Rockey acknowledged the effort that staff members had made to raise attendance but ultimately gave the school a grade of inadequate for its progress on that priority. "Attendance is still too low," she wrote. "This is despite the hard work by staff to encourage regular and timely attendance." She noted that, "since the last inspection, attendance has been closely monitored and swift action taken to arrest poor attendance and lateness. As a result of the targeted approach … attendance is slowly improving. Nonetheless, the rate of improvement is not good enough."[47]

Asked for his top advice for American policymakers who might be interested in creating inspectorates, HMI Ceri Morgan says, "we think it is crucial that the inspection process is distinct from the advice and improvement process. Ofsted is an inspectorate, not an advisory body. It is for schools to choose how to seek improvement in any given aspect." Even so, England's inspections clearly provide far more encouragement, feedback, and diagnosis for improvement than could any purely quantitative accountability system, whether based primarily on test scores like NCLB or on a variety of statistical indicators.

Costs and Human Capacity: What Would It Take to Inspect U.S. Schools?

Relying on inspections rather than quantitative formulas to judge schools in the U.S. will undoubtedly require states to spend more than they do now on school accountability systems. According to one oft-cited estimate by Richard Rothstein, Rebecca Jacobsen, and Tamara Wilder, authors of the 2008 book *Grading Education*, an Ofsted-style inspection system would cost about one-half of 1 percent of U.S. spending on K–12 education if schools were inspected every three years, or around $2.5 billion annually.[48]

But the actual costs might not be so high under the kind of proportionate system Ofsted adopted in 2009. Ofsted has significantly reduced the cost of inspections since Rothstein and his coauthors calculated their estimate. Using the same methodology with more recent figures, it would cost about $1.1 billion annually to conduct similar inspections in the U.S. And using an alternative methodology based on Ofsted's actual operating budget and expenditure per inspection, the cost would be nearer to $635 million annually. These are only rough "back of the envelop" estimates; policymakers would need to carefully determine real costs based on actual policy designs. But these figures suggest that American education leaders need not be automatically dissuaded by an exorbitant price tag. (See Figure 9.)

Another concern is the human capacity requirements of an English-style inspection system, especially given the current demand for experts to assist with the Obama administration's School Improvement Grants initiative. Assuming an Ofsted-style approach in which about 15 percent of inspectors are permanently appointed (perhaps as "Governor's Inspectors" rather than "Her Majesty's Inspectors") and the rest supplied by contractors, fielding a comparable inspection

Figure 9. Estimated Cost and Number of Inspectors Necessary to Conduct English-Style Inspections in the United States

	Lower-bound annual cost estimate for English-style inspections	Upper-bound annual cost estimate for English-style inspections	Estimated HMI-type inspectors	Estimated AI-type (contractual) inspectors	TOTAL estimated inspectors
Alabama	$10,283,611	$14,561,798	18	113	130
Alaska	$3,252,192	$4,370,633	6	36	41
Arizona	$14,448,473	$18,791,513	25	158	183
Arkansas	$7,198,528	$9,239,331	12	79	91
California	$64,709,622	$130,895,703	111	709	819
Colorado	$11,524,072	$15,658,586	20	126	146
Connecticut	$7,487,754	$18,972,381	13	82	95
Delaware	$1,394,715	$3,308,913	2	15	18
District of Columbia	$1,497,551	$2,947,515	3	16	19
Florida	$25,985,399	$50,823,758	44	285	329
Georgia	$15,817,479	$34,808,274	27	173	200
Hawaii	$1,857,477	$4,848,463	3	20	24
Idaho	$4,769,025	$4,265,243	8	52	60
Illinois	$28,312,066	$51,188,123	48	310	358
Indiana	$12,603,851	$21,091,344	22	138	160
Iowa	$9,435,213	$10,308,232	16	103	119
Kansas	$9,120,277	$10,469,120	16	100	115
Kentucky	$9,910,830	$12,825,511	17	109	125
Louisiana	$9,563,758	$15,853,323	16	105	121
Maine	$4,171,290	$5,120,816	7	46	53
Maryland	$9,300,241	$25,254,909	16	102	118
Massachusetts	$11,800,444	$30,376,105	20	129	149
Michigan	$24,931,329	$37,511,200	43	273	316
Minnesota	$15,637,516	$20,196,757	27	171	198
Mississippi	$6,973,574	$8,643,236	12	76	88
Missouri	$15,598,952	$19,231,488	27	171	198
Montana	$5,321,769	$3,128,686	9	58	67
Nebraska	$7,198,528	$6,652,691	12	79	91
Nevada	$4,087,735	$7,856,311	7	45	52
New Hampshire	$3,110,792	$5,426,212	5	34	39

	Lower-bound annual cost estimate for English-style inspections	Upper-bound annual cost estimate for English-style inspections	Estimated HMI-type inspectors	Estimated AI-type (contractual) inspectors	TOTAL estimated inspectors
New Jersey	$16,646,595	$51,392,815	28	182	211
New Mexico	$5,495,305	$6,941,748	9	60	70
New York	$30,400,925	$105,959,747	52	333	385
North Carolina	$16,389,505	$27,168,870	28	179	208
North Dakota	$3,322,892	$2,022,944	6	36	42
Ohio	$24,397,867	$42,260,512	42	267	309
Oklahoma	$11,536,926	$11,072,067	20	126	146
Oregon	$8,361,861	$12,047,602	14	92	106
Pennsylvania	$20,850,021	$47,564,027	36	228	264
Rhode Island	$2,063,149	$4,660,837	4	23	26
South Carolina	$7,751,272	$14,437,440	13	85	98
South Dakota	$4,589,061	$2,353,067	8	50	58
Tennessee	$11,389,099	$16,923,917	19	125	144
Texas	$55,396,527	$88,645,568	95	607	701
Utah	$6,722,911	$7,927,641	12	74	85
Vermont	$2,076,004	$3,079,158	4	23	26
Virginia	$13,908,584	$29,423,387	24	152	176
Washington	$14,898,381	$21,655,967	26	163	189
West Virginia	$4,878,288	$6,665,425	8	53	62
Wisconsin	$14,409,910	$21,124,750	25	158	182
Wyoming	$2,333,094	$2,763,423	4	26	30
U.S.	**$635,122,239**	**$1,130,717,093**	**1,087**	**6,955**	**8,042**

Note: See Appendix for data and methods used to calculate estimated costs and personnel figures.

Source: U.S. Department of Education National Center for Education Statistics, Numbers and Types of Public Elementary and Secondary School From the Common Core of Data: School Year 2009–10, First Look, Table 2, page 7. U.S. Department of Education National Center for Education Statistics, Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2008–09 (Fiscal Year 2009), First Look, Table 2, page 5.

workforce in the U.S. would require about 8,000 inspectors. (See Figure 9.)

States that decide to inspect schools should consider a feature of England's system that promotes both quality assurance and economic feasibility—a politically independent inspectorate that can contract with private organizations to build the necessary inspection capacity. Rothstein has suggested that the venerable regional accreditation associations might be converted into Ofsted-type inspectorates, but there is a huge gap between current American "accreditation visits" and Ofsted-style inspections.[49] Also, it's not clear that federal or state authorities have the power to force voluntary membership associations to take on such responsibilities and perform them well. Instead,

if regional accreditation associations are interested in conducting inspections, they could bid for contracts along with other prospective inspection providers.

Finally, given how little experience states have with anything resembling true inspections, federal policymakers should consider offering start-up and three-year implementation funding for states that agree to pilot a rigorous inspection system. Groups of states could build on the shared expectations for student learning embedded in the new Common Core State Standards and common assessment systems, pooling resources and expertise to craft a common inspection framework aligned with those expectations. Finally, states could at least investigate whether it might be feasible to "share" an independent inspectorate modeled on Ofsted, though everyone involved would need to take great pains to avoid any suspicion that "federal inspectors" would be visiting and judging schools.

Obviously, a state designing its own inspection system would develop a framework reflecting its own policy goals as well as what's known about effective and ineffective schools. For example, if a state had a strong focus on ensuring high-performing students were being academically challenged, it could address that in its inspection framework. Or, if it had a focus on closing within-school opportunity and achievement gaps, it could direct inspectors to examine inequities in teacher quality, disciplinary actions, and achievement among different groups of students. England's own revised framework for 2012 puts much greater emphasis on within-school gaps in attainment, progress, and achievement.

Indeed, state policymakers would face many challenges in designing and implementing high-quality inspection systems, political and economic as well as technical. But American schools deserve the same kind of diagnostic guidance and feedback that Peterhouse Primary School enjoyed on its journey to improvement. If American policymakers expect U.S. schools to make vigorous efforts to improve, they must develop accountability systems that can diagnose, inform, and encourage schools rather than merely "rate" them.

Notes

1. *Peterhouse Community Primary School Inspection Report 10–11 March 2010* (London: Ofsted, 2010).
2. *Report to Congress on the Elementary and Secondary Education Act State-Reported Data for School Years 2003–04 to 2007–08* (Washington, DC: U.S. Department of Education, March 2011).
3. This paper follows the United Kingdom's convention of calling England, Scotland, Wales, and Northern Ireland "countries." While the United Kingdom has a national Department for Education, each country administers its own education system and operates a unique system of school inspections.
4. England appointed its first pair of Her Majesty's Inspectors in 1839. In February of that year, Lord John Russell laid a letter before the House of Commons at the command of Queen Victoria communicating her concerns about the quality of the country's schools, including a lack of adequate inspection. As a result, in December 1839 the government appointed two professional school inspectors as a condition for elementary schools to receive grants from the Treasury, and Her Majesty's Inspectors began their work in 1840. See Thomas Humphrey Ward, *The Reign of Queen Victoria: A Survey of Fifty Years of Progress, Volume II*, (London: Smith, Elder, & Company, 1887).
5. Over time, the government has merged other inspection agencies into Ofsted, and Ofsted now inspects a wide range of services including early childcare, teacher training, and adult education.
6. Peter Matthews and Pam Sammons, "Survival of the Weakest: The Differential Improvement of Schools Causing Concern in England," *London Review of Education*, July 2005. In the U.K., publicly funded schools are called "maintained schools," and the term "public schools" carries a different meaning. However, because this paper is intended primarily for an American audience, it uses the term "public school" instead of "maintained school" to refer to schools that are publicly funded.
7. For the annual risk assessment, Ofsted considers students' assessment results and attendance data as well as any complaints made by parents.
8. England is unique among European countries in providing such short notice of inspection. Prior to 2005, schools received up to 10 weeks of notice, but Ofsted reduced the time frame because of reports from educators that the long wait heightened anxiety and encouraged long hours of preparation. Surveys indicate that England's educators greatly prefer the shorter notice period.
9. *Conducting School Inspections: Guidance for Inspecting Schools under Section 5 of the Education Act 2005, from September 2009* (London: Ofsted, April 2011).
10. Tami McCrone, Misia Coghlan, Pauline Wade, and Peter Rudd, *Evaluation of the Impact of Section 5 Inspections–Strand 3: Final Report for Ofsted* (Slough: National Foundation for Educational Research, June 2009).
11. Ofsted is the first European inspectorate to include a letter to students. Lead inspectors tailor the letters to the age of the students generally but aim the prose toward the oldest

students in the school to avoid patronizing them. The letters must summarize the main inspection findings, including the school's strengths as well as its priorities for improvement, but do so in a way that does not undermine school staff. Most letters communicate how students can contribute to the school's improvement effort as well.

12. The number of schools that closed while under special measures is based on information from two sources. First, the number of schools that closed from 1993 through 2004 is from Table 2 in Peter Matthews and Pam Sammons, "Survival of the Weakest: The Differential Improvement of Schools Causing Concern in England." Second, the number of schools closed from January 1, 2005, through April 8, 2011, is from 19 separate reports on schools causing concern downloaded from Ofsted's website at http://www.ofsted.gov.uk/schools/for-all-other-users/statistics-for-schools. Ofsted publishes reports on schools entering and exiting categories of concern three times per year.

13. Ofsted publishes a *Framework for School Inspection* that lays out the general policies for inspection and an *Evaluation Schedule for Schools* that sets out the specific evidence, criteria, and grade descriptors for judging schools. However, because the term "schedule" has a different meaning for American readers, this paper refers to the *Evaluation Schedule* as a "framework."

14. Broader, Bolder Approach to Education, http://www.boldapproach.org

15. Her Majesty's Inspector Ceri Morgan, in discussion with author, September 3, 2011.

16. In 2010, the newly elected coalition government raised concerns that demographic weights used to calculate the CVA might be placing a ceiling on expectations for disadvantaged students and impeding England's efforts to close achievement gaps. As a result, in 2012 Ofsted will begin using a new, more "straightforward" value-added measure currently under development.

17. Ofsted, *The Evaluation Schedule for Schools: Guidance and Grade Descriptors for Inspecting Schools in England under Section 5 of the Education Act 2005, from September 2009* (London: Author, April 2011).

18. Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

19. "Ofsted Reassures 'Failing' Schools," *Times Educational Supplement Magazine*, September 30, 2011.

20. "Heads Angry Over Surge in School Ofsted Failures," *The Independent*, March 6, 2010.

21. Warwick Mansell, "Ofsted: Overseeing the Tyranny of Testing," in *Inspecting the Inspectorate: Ofsted Under Scrutiny* (London: Civitas, 2008).

22. Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

23. "Education Bill Gives Ministers Powers to Order Closure of Schools," *The Guardian*, January 27, 2011. Gove also recently expressed concerns that the grade for "quality of teaching" might not be playing a ***strong enough*** role when judging schools' overall effectiveness.

24. Letter from Governor Edmund G. Brown to the members of the California State Senate, October 8, 2011. Emphasis in original.

25. The firms are CfBT Education Trust, Serco, and the Tribal Group. According to a letter from Her Majesty's Chief Inspector in reply to a query from Parliament, as of July 2, 2009, Ofsted employed 443 HMIs, of whom 245 inspected schools, and firms under contract provided 1,948 AIs, of whom 1,567 inspected schools. According to a memorandum the firms submitted to the House of Commons Education Committee in October 2010, HMIs lead about 75 percent of secondary school inspections, and AIs lead about 60 percent of all inspections.

26. Her Majesty's Inspector Ceri Morgan, in discussion with author, September 3, 2011.

27. Supplementary memorandum submitted to the House of Commons Education Committee by CfBT, Serco, and Tribal, 2011.

28. Such measures appear to be working. After considering proposals from education groups for HMIs to conduct all inspections, the House of Commons Education Committee recently concluded, "We are not convinced that there is a definite or systemic difference in quality between Her Majesty's and Additional (contracted) Inspectors." See House of Commons Education Committee, *The Role and Performance of Ofsted: Second Report of Session 2010–11* (London: The Stationery Office, March 23, 2011).

29. *Conducting School Inspections: Guidance for Inspecting Schools under Section 5 of the Education Act 2005, from September 2009* (London: Ofsted, April 2011).

30. For example, in a March article on debates about fixing NCLB, the *Washington Post* reported that, "Defenders of the law say that Obama's proposals could let too many mediocre schools off the hook for not helping their neediest students." "Most Schools Could Face 'Failing' Label under No Child Left Behind, Duncan Says," *Washington Post*, March 8, 2011.

31. Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

32. House of Commons Education Committee, *The Role and Performance of Ofsted* (London: The Stationery Office, April 17, 2011).

33. House of Commons Education Committee, *The Role and Performance of Ofsted: Responses from the Government and Ofsted* (London: The Stationery Office, June 28, 2011).

34. The action plans are reviewed by HMIs and must be approved by Ofsted. In 2009–10, Ofsted judged only about 60 percent of the action plans written for schools placed in special measures to be adequate for guiding improvement efforts. The rest has to be significantly revised before the first monitoring visit.

35. *Peterhouse Community Primary School Inspection Report 10–11 March 2010* (London: Ofsted, 2010).

36. Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010).

37. Elementary and Secondary Education Act, Section 1116 (b) (3) (C).

38. Institute for a Competitive Workforce, "NCLB: Too Many Schools Identified; Too Little Improvement," *ICW's February 2011 Newsletter*, February 23, 2011, http://icw.uschamber.com/newsletter-article/nclb-too-many-schools-identified-too-little-improvement.

39. Letter from Alan Armstrong to parents of students at The Misbourne: An Arts and Technology College, March 21, 2011.

40. Ian Seath, *Special Measures: Monitoring Inspection of Peterhouse Primary School* (London: Ofsted, September 30, 2010).

41. Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2009/10* (London: The Stationery Office, November 23, 2010). Peterhouse's biggest advantage was having a headteacher who already understood the need to make significant changes before the school was placed into special measures. The same Ofsted analysis found that almost all of the secondary schools and many of the primary schools required the appointment of an external headteacher before the school could "come to terms with the inspection findings" and begin to make difficult changes.

42. *Report to Congress on the Elementary and Secondary Education Act State-Reported Data for School Years 2003–04 to 2007–08* (Washington, DC: U.S. Department of Education, March 2011).

43. Tami McCrone, Misia Coghlan, Pauline Wade and Peter Rudd, *Evaluation of the Impact of Section 5 Inspections–Strand 3: Final Report for Ofsted* (Slough: National Foundation for Educational Research, June 2009).

44. *Protocol for the Selection of Satisfactory Schools for a Section 8 Monitoring Inspection* (London: Ofsted, December 2010).

45. *Monitoring Inspections of Schools Whose Overall Effectiveness Is Satisfactory* (London: Ofsted, September 2010).

46. House of Commons Education Committee, *The Role and Performance of Ofsted* (London: The Stationery Office, April 17, 2011).

47. Linda Rockey, *Special Measures: Monitoring Inspection of Field View Primary School* (London: Ofsted, October 18, 2010). During her most recent monitoring visit to Field View on September 30, 2011, Rockey judged the school's progress in improving attendance to be good.

48. Richard Rothstein, Rebecca Jacobsen, and Tamara Wilder, *Grading Education: Getting Accountability Right* (New York: Teachers College Press, 2008).

49. Richard Rothstein, Rebecca Jacobsen, and Tamara Wilder, "From Accreditation to Accountability," *Phi Delta Kappan*, May 2009.

Appendix

This appendix describes the data and methods used to calculate the cost and personnel estimates in Figure 9.

I. Estimated Annual Costs for School Inspections

A state would face many policy choices and tradeoffs when designing its own inspection system. These estimates apply only to costs associated with an inspection system that closely resembles the model implemented in England from September 2009 through December 2011.

A. Lower-Bound Cost Estimate

This estimate is based on Ofsted's budget for 2009–10, according to information provided to Parliament by Her Majesty's Chief Inspector Christine Gilbert on June 9, 2009. That year, Ofsted's total budget was £215,500,000. However, that amount included line items for two directorates that do not inspect schools, the Children Directorate and the Learning and Skills Directorate, plus additional line items related to capital expenses and certain non-recurring costs.

Therefore, instead of using Ofsted's total budget, we used the budget for its Education Directorate, which has responsibility for school inspections, plus a proportionate fraction of the combined budgets for two directorates that provide various kinds of administrative support for the Education Directorate, the Children Directorate, and the Learning and Skills Directorate.

Ofsted's 2009–10 budget for its Education Directorate was £69,700,000, which amounted to about 45 percent of the combined budgets for the Education Directorate, the Children Directorate, and the Learning and Skills Directorate. Forty-five percent of the combined budget for Ofsted's two administrative directorates (the Corporate Services Directorate and the Finance, Procurement, and Property Directorate) amounted to £20,725,275. Therefore, the adjusted budget figure we used for our estimate was £90,425,275 (£69,700,000 plus £20,725,275), which represents about 42 percent of Ofsted's entire budget for 2009–10.

Next, we calculated a ratio based on that figure and the universe of English schools that Ofsted's Education Directorate has responsibility for inspecting. To obtain the latter, we added the number of English primary schools (16,971), secondary schools (3,127), and special schools (979) to one-half of England's independent schools (1,188). (Ofsted's Education Directorate has responsibility for inspecting only about one-half of the country's 2,376 independent schools). That produced a ratio of £90,425,275 to 22,265, or £4,061 per "inspection eligible" school.

Next, we converted that figure to $6,427 using the Interbank currency exchange rate as of October 16, 2011, and multiplied it by the total number of public schools in the United States in 2009–10 (98,817), which produced an overall estimate of $635,122,239. Finally, we multiplied the $6,427 figure by the total number of public schools in each state to calculate state-level estimates.

(Note that this method might overestimate the costs for U.S. school inspections. In a June 10, 2009, letter to Parliament, Her Majesty's Chief Inspector stated that from April 2008 to March 2009, the "proportion of Ofsted's expenditure spent on the inspection of maintained schools" was 31.1 percent, which is considerably lower than the 42 percent of Ofsted's 2009–10 operating budget we used above. However, that difference might simply reflect differences between expenditures, which are reported after the fact, and operating budgets, which are generated before the fact.)

As a check on this estimate, we calculated an additional estimate using an alternative methodology based on Ofsted's average spending per school inspection. According to an April 2011 presentation by Adrian Gray, an HMI and Divisional Manager, in 2009–10, "the average secondary school inspection cost £18,000 [and] the average primary school inspection cost £9,000."

We converted those figures to $28,486 and $14,243, respectively, using the Interbank currency exchange rate as of October 16, 2011. Assuming that U.S. policymakers might decide to start by inspecting one-third of schools per year, we multiplied $28,486 by one-third of the 32,528 regular "middle" and "high" schools in the United States; $14,243 by one-third of the 52,306 regular "primary" schools in the United States; and $21,364 by one-third of the 3,380 "other" regular schools in the United States. Adding the three resulting figures produced an overall annual estimate of $581,265,727.

Note that this second calculation probably underestimates the actual annual cost because we could not take into account approximately 10,000 public schools that did not fall under NCES's operational definition of a "regular" school. However, the calculation does offer some additional evidence to support the lower-bound estimate described above. (The total number of "regular" public schools we used in the second calculation represents about 89.3 percent of the total public schools used in the first calculation, and the resulting $581,265,727 calculation is about 91.5 percent of the first $635,122,239 estimate described above.)

B. Upper-Bound Cost Estimate

This estimate is based on the same methodology described by Richard Rothstein, Rebecca Jacobsen, and Tamara Wilder in their 2008 book *Grading Education*, but relies on more recent figures released by governmental agencies in England. This method uses the ratio of Ofsted's spending on school inspections to total public spending on English primary and secondary schools.

According a June 10, 2009, letter to Parliament from Her Majesty's Chief Inspector, from April 2008 through March 2009, Ofsted spent £57,500,000 on full inspections and £8,400,000 on monitoring inspections of maintained schools in England, for a total of £65,900,000. According to the 2009 *Departmental Report* of the Department for Children, Schools and Families, current expenditures on primary and secondary schools by central and local governments in England amounted to £30,248,000,000 in 2008–09. The resulting ratio was £65,900,000 to £30,248,000,000, or 0.00218 (in other words, about 0.218 percent).

Next we multiplied 0.00218 by U.S. current expenditures on public elementary and secondary education in FY 2009 according the National Center for Education Statistics ($518,997,430,000), which produced an estimate of $1,130,717,093. Finally, to calculate state-level estimates, we multiplied 0.00218 by current expenditures on public elementary and

secondary education by state. (For this narrative description we rounded the ratio. Readers who attempt to replicate the estimates in Figure 9 using the rounded ratio might obtain different results. Raw data used for the estimates in Figure 9 are available upon request.)

II. Estimated Number of Inspectors

First, we added the number of English primary schools (16,971), secondary schools (3,127), and special schools (979) to one-half of England's independent schools (1,188). (Ofsted's Education Directorate has responsibility for inspecting only about one-half of the country's 2,376 independent schools.) That produced a universe of 22,265 "inspection eligible" schools.

Next, we calculated ratios of inspectors to "inspection eligible" schools, based on figures in a July 6, 2009, letter to Parliament by Her Majesty's Chief Inspector. That yielded 0.011 HMIs per school (245 to 22,264); 0.070 AIs per school (1,567 to 22,264); and 0.081 total inspectors (HMIs plus AIs) per school (1,812 to 22,264).

Then we multiplied those ratios by the 98,817 total public schools in the United States in 2009–10, which produced an estimate of 1,087 HMIs, 6,955 AIs, and 8,042 total inspectors necessary to manage an English-style inspection system in the United States. Finally, we applied those same ratios to the total number of public schools in each state to calculate the state-level estimates in Figure 9.

Data sources for lower-bound cost estimates:

Parliament Daily Hansard—Written Answers June 16, 2009, *Letters from Christine Gilbert dated June 9 & 10, 2009*, http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm090616/text/90616w0020.htm

Department for Education, *Schools, Pupils and their Characteristics: January 2010*, http://www.education.gov.uk/rsgateway/DB/SFR/s000925/index.shtml

Numbers and Types of Public Elementary and Secondary School From the Common Core of Data: School Year 2009–10, First Look (Washington, DC: U.S. Department of Education National Center for Education Statistics, April 2011), Table 2, page 7.

Adrian Gray, *The Work of Ofsted*, April 2011, slide 48.

Data sources for upper-bound cost estimates:

Parliament Daily Hansard—Written Answers July 9, 2009, *Letters from Christine Gilbert dated June 9 & 10, 2009*,

Department for Children, Schools and Families, *Departmental Report 2009* (London: The Stationery Office, June 2009) Table 8.5: "Education Expenditure by Central and Local Government by Sector in Real Terms in England, 1997–98 to 2008–09," page 177.

Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2008–09 (Fiscal Year 2009), First Look (Washington, DC: U.S. Department of Education National Center for Education Statistics, June 2011), Table 2, page 5.

Data sources for estimates of number of inspectors:

Daily Hansard—Written Answers July 9, 2009, *Letter from Christine Gilbert dated July 6, 2009*, http://www.parliament.the-stationery-office.co.uk/pa/cm200809/cmhansrd/cm090709/text/90709w0019.htm

Department for Education, *Schools, Pupils and their Characteristics: January 2010*, http://www.education.gov.uk/rsgateway/DB/SFR/s000925/index.shtml

Numbers and Types of Public Elementary and Secondary School From the Common Core of Data: School Year 2009–10, First Look (Washington, DC: U.S. Department of Education National Center for Education Statistics, April 2011), Table 2, page 7.