

The Critical Need for a True Educational Accountability—a Call to Action

White Paper
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Introduction

This white paper is a call for a new educational accountability and an invitation to join the work. Its purpose is to identify the need for a new accountability based not on better tests or the creation of new formulas for computing school labels or grades, but rather, on how accountability works in effective organizations.

The desire for a new educational accountability is nothing new. There exists a broad consensus across the country that what we have is both flawed and inadequate, and yet despite that consensus it has proven deeply recalcitrant when it comes to change.

I have long argued that what has prevented a more productive dialogue is the lack of a coherent theory of how accountability works in organizations. This white paper offers the beginning of an articulation of just such a theory, and with it the hope of something far better than what currently exists.

What is described here is not work we hope to do one day, but work that is occurring now, in districts across the country, with more joining with each month that passes. For the first time since test-based accountability was imposed on schools we have real hope for something better.

Accountability Theory Basics

Any accountability is a knowledge development and transmission tool that communicates effectiveness. Effectiveness refers both to performance, which is in the past, and mission-

readiness, which is going forward. The effect of accountability is always in the future, as we don't decide to do things in the past, so it is proper to think of accountability as always having a forward-facing function.

I use the term *effectiveness* rather than *quality* quite intentionally. This is because we can create agreements as to what is meant by effectiveness, but quality has a far too ephemeral sense to be useful in accountability conversations.

There are four types of accountability within any organization, which are differentiated according to who determines effectiveness. All types of accountability are always operating within any organization. See the table below.

Type of Accountability	Who determines Effectiveness?	Nature of Audience/ Knowledge?
Personal	Me	Technical
Internal	My Boss	Practical
Professional	My Peers	Methodological
Organizational	External Stakeholders	Non-Technical, non-practical, and non-methodological

While each type of accountability functions as a knowledge development and transmission system¹ the adjudicator (the person/people that identify effectiveness) and the nature of the knowledge to be communicated differ a great deal.

The *personal accountability* is about a person's sense of their own effectiveness. It is deeply

technical and detailed. The *internal accountability* is sufficiently practical that an employer can understand and judge an employee's effectiveness regarding their technical work. The *professional accountability* is a methodological accountability that requires multiple peers to make the effectiveness determination, as a profession is created from a deep level of methodological and technical knowledge that could never be housed in any one person.

Organizational accountability is unique. Its knowledge is developed for *outside stakeholders* who must be presumed to lack the technical, practical, or methodological knowledge required by the other accountabilities (think patients and hospitals, investors and tech companies, students in schools and parents or community members, etc.). For organizational accountability to be effective, it must develop knowledge appropriate for those stakeholders and then effectively communicate it.

All types of accountability are clearly related, and it is up to an organization's leaders to see that each is properly placed:

- The organizational accountability is where knowledge will be developed and transmitted to outside stakeholders regarding where an organization is or is not effective.
- The internal accountability will see to it that problems are resolved, and the organization can improve over time.
- The personal accountability will always be operating both in the day to day work and the overall culture and needs to align with the goals of the organization, and
- The professional accountability will help keep everyone grounded and honest, aiding in the process of solving problems and offering expertise and insights.

None of this operates in any sort of ideal environment, as organizations are living, breathing things that are constantly in flux. The balancing act between the different accountabilities will always be a challenge to the point that trying to tie them up into a neat little bow or fully operationalize them will likely lead to frustration. That does not mean the accountabilities can live without discipline—they cannot. Rather, it means that one job of a leader is to constantly weigh how best to navigate

between them while always keeping in sight what the organization is trying to accomplish.

Failure to apply the right level of discipline risks asking an accountability to do a job beyond its design. This in turn creates the risk that the organization will fail to deliver on its promise to stakeholders. In extreme examples, it may even work against the stakeholder's needs. For example:

- If my *personal* accountability is also the *internal* accountability the organization and subsequently those it is designed to serve risk not getting what either need and the organization will function poorly. This is because my personal accountability may or may not line up with the needs of the organization and those it is designed to serve.
- If an *internal* or an *organizational* accountability trumps my *professional* accountability it puts the profession and those who rely on its integrity at risk. This is because those without technical or methodological understandings risk making decisions that compromise the profession. For example, think of the consequences for the legal or medical professions and those who rely on them if those with no medical or legal training dictated the work to be done.
- Because a *professional* accountability is focused on method and content, it is not designed to also run an organization and would be ill-equipped to do so as an *organizational* or *internal* accountability. While it is critical not to compromise the knowledge and methodology within a professional accountability, the work in which professional knowledge is used will differ in context and character from day to day and even minute to minute. A professional accountability cannot anticipate every context, but rather, relies on the practitioners to exercise their professionalism within whatever context they find themselves—including leadership roles. It also relies on those practitioners to know when changes to the profession are warranted and what those changes should be.

- While *organizational* accountability reflects on and should impact the decisions within the organization, it would be silly to ask it to also serve as an *internal* or a *professional* accountability given that doing so would remove any opportunity to seek out root causes for failure and create meaningful improvements. This would occur if every aspect of the organization is viewed through a singular judgment and told to act accordingly, which would be appropriate if the singular judgment matched that aspect of the organization, but inappropriate everywhere else. Acting as if the singular judgment applies universally would make an organization less, not more effective.

When we talk about True Accountability in schools we are talking about the *organizational* form of accountability. Like any of the accountabilities, it is a knowledge development and transmission system. However, unlike the other accountabilities the knowledge must be developed for external stakeholders whose understanding of schools and what happens within them is non-technical, non-practical, and non-methodological. Every profession in the world (medicine, law, accounting, engineering, etc.) has figured out how to do this, leaving education as the anomaly.

Instead, accountability has been something done *to* education. Understanding why and how this was done is useful as we attempt a better way.

A Brief History

It can rightly be said that the public-school system has since its inception been run with the personal accountability serving as the primary accountability, very heavily influenced by perception. The assignment of grades or marks by teachers to students was a closed system determined by a teacher's view of their own and their students' efforts and was designed to serve as an indicator of student achievement. As achievement was the goal of schooling those marks served as the primary representation of what happened in a school. But they also inadvertently served as a sort of proxy for the organizational accountability, since no other form of organizational accountability was in place.

The major problem with another accountability taking on the role of the organizational

accountability is that it will fail to communicate to stakeholders where an organization is or is not effective, leaving bias and perception to prevail. The fact that the personal accountability also served as the organizational accountability in schools for years (accompanied by bias) was simply an artifact of how teaching and learning occurred—led by teachers in classrooms. It was never designed to offer up information on where the schools were and were not effective.

This was certainly the case in 1964 when the passage of the Civil Rights Act required a study of the American educational system, focused on equity and the ideas of fairness and opportunity, particularly related to the black-white achievement gaps. James Coleman, a sociologist at Johns Hopkins, undertook the study, which is now widely regarded as one of the most important studies on education from the last century.

In a reflection piece on the fifty years since the Coleman report Dr. Heather Hill summarized its findings this way: "Schools appeared to exert relatively little pull—explaining only 10 to 20 percent of the variability in student outcomes—while family background, peers, and students' own academic self-concept explained a much larger amount."²

Coleman said it this way:

"One implication stands out above all: That schools bring little influence to bear on a child's achievement that is independent of his background and general social context; and that this very lack of an independent effect means that the inequalities imposed on children by their home, neighborhood, and peer environment are carried along to become the inequalities with which they confront adult life at the end of school."³

It is a misunderstanding to suggest that Coleman viewed this as an intractable problem. Rather, he was observing something about the past he found deeply troubling and the future could and should be far different. But what a future should look like that could finally overcome such unfairness was an uncertainty at best. Coleman's job was to identify the problem. It would be up to others to solve it.

But solving this problem would be no small undertaking. It would require facing a history of racism head on, of learning to think differently about the goals and purposes of schooling, about whether or not traditional modes of schooling were capable of meeting a new set of societal needs, and how best to spend resources to create the greatest amount of benefit for students. In short, it would take time.

From 1966 when the report was released to 1982 the effects of civil rights on opportunity and representation in schools and universities was palpable, with many more students from historically marginalized backgrounds gaining access to institutions they had been previously denied. And policy makers were right in the thick of things. For example, based on Coleman's work that found one of the conditions that would make schools more effective for all students was a more integrated school, desegregation and forced busing became the norm in urban environments.⁴

What was also true was that the education gaps identified by Coleman persisted over that same period of time. Those gaps, combined with Coleman's finding that schools historically had not had the overall educational effect that most people expected, contributed to a growing narrative of schooling as a failed institution. After all, the problem had been identified and yet schools were proving incapable of doing much about it.

Some of this narrative was based on narrow perceptions of public education and historical biases, and some of it was actually true. Public education was far from a perfect institution at the time and certain segments of the country remained mired in old ways of thinking that made change difficult. But it was also true that more students were succeeding in school, going to college, and living lives they would not have a decade earlier. The change was certainly slower than most people wanted, but it was at least starting to move in a more positive direction.

But it was the failure narrative that seemed to resonate with the public and policy makers. That narrative was amplified a thousand times over in *A Nation at Risk*, released by President Reagan's secretary of education Terrel Bell in 1983. The introduction is stark:

"[t]he educational foundations of our society are presently being

eroded by a rising tide of mediocrity that threatens our very future—as a Nation and a people...If an unfriendly foreign power had attempted to impose on America the mediocre educational performance that exists today, we might well have viewed it as an act of war."⁵

As you can well imagine, within days of such a statement from a cabinet level official the findings that the writers claimed to have unearthed were splayed across headlines all over America.

That document accused the educational profession of malfeasance, of having devolved into a state of no accountability whatsoever in which educators were content with an inferior result.⁶

This was actually half right.

The malfeasance claim was the part that would clearly prove to be wrong. It wasn't that improvements weren't warranted—many of course were—but according to Robert Huelskamp, one of the authors of *The Sandia Report* that explored the claims in the *At Risk* report a few years later: "on nearly every measure we found steady or slightly improving trends,"⁷ just the opposite of what *At Risk* claimed to have found.

This wasn't because the researchers who did the *At Risk* report and those who worked on the *Sandia Report* had a difference of opinion, but rather, those who worked on the *Sandia Report* were actually researchers. Those who crafted the *At Risk* report were not, lacking even a single educational academic as part of their commission.⁸ In other words, the accusation of malfeasance was concocted from something other than evidence, because the evidence suggested something else entirely.

What the report got right—although inadvertently—was to make it clear that no formal *organizational* accountability then existed. If it had it would have assisted in developing and transmitting the necessary knowledge for stakeholders to understand the effectiveness of their schools, which would have shown the claims in the *At Risk* report and the development of the broad narrative of failure to be motivated by something other than the truth. The *Sandia* report was able to show that, but years after the *At-Risk* report had done its damage. The impact of not

having an organizational accountability in place in 1983 is enormous given the degree to which the false claims in *At Risk* were and continue by many to be accepted as fact.

The arguments as to how the *At Risk* writers could have allowed their perceptions and bias to color the results so completely needs to be reserved for another time. The culprits include politics, willful bias, President Reagan's hope to abolish the Department of Education and his support for vouchers, and a host of misunderstandings. For now, it will have to be sufficient to understand its impact as that impact continues to the present and is the source of our current concern.

One of the recommendations of the report was to utilize standardized tests (I have started referring to these as *predictive tests* to indicate what they are designed to do, rather than the conditions under which they are administered) in an accountability role. Coleman used this type of instrument in his research and the writers of the *At Risk* report wanted it used in a more formal role going forward.

In the early 1990s the writers of *A Nation at Risk* would get their wish. The accountability situation in schools was finally beginning to be rethought, although the results of that thinking were clearly shortsighted. In the language of accountability presented earlier, the personal accountability of grades as the only view into schools had reached a point where it was no longer recognized by educational stakeholders as a reasonable organizational accountability as it failed to communicate real effectiveness. The professional accountability was perceived by those same stakeholders as having failed at creating an organizational accountability. The internal accountability was perceived to be doing a terrible job getting rid of teachers in schools stakeholders believed to be bad schools. And no true organizational accountability had yet been created for schools.

The right course of action would have been to build a proper organizational accountability that would allow a school to indicate where it was and was not effective, based on evidence and considering context, just as accountability works in any effective organization. This would have been the first step to a realignment of all the accountabilities in a school that stood a chance of supporting the public's demands to understand the

effectiveness of their schools and to set them on a path of continuous improvement.

Which was not what happened.

Instead, the accountability that was created drew on the prevailing narrative promoted in *A Nation at Risk* that public education was in a state of crisis which was being ignored by the unions, tolerated by the professional organizations, and sustained by bad teachers. The answer, so it seemed to those offering it, was to hold the teachers' feet to the fire by elevating the internal accountability to the level of the organizational accountability. If the problem was teachers, which the narrative suggested, then it would seem proper to place the organizational accountability there. If that impacted the professional accountability so be it—the profession was perceived as ineffective anyway. And anything, they seem to have reasoned, would be better than the personal accountability that had long served as the proxy for the organizational accountability and left stakeholders blind as to the actual effectiveness of schools.

In hindsight, this re-shuffling of accountabilities can be seen as counterproductive. The primary problem was not the internal accountability—even though that may or may not have been a contributor—but the fact that no organizational accountability had ever been in place for schools. The answer should have been to build just such an accountability, but the prevailing biases regarding public schooling and the education profession, and the feeling of crisis it engendered, prevented that as even a possibility.

Test-based accountability, which began nationally with the 1994 ESEA reauthorization under then President Clinton, was the first formal gesture that elevated the internal accountability for teachers in the form of predictive test scores to such a level that it could be considered an organizational accountability, just as the *At Risk* report had imagined. The 2001 reauthorization under President Bush, commonly known as No Child Left Behind (NCLB), ensured that would happen.

And while we have been through several iterations of this form of accountability since, the foundation of test—judge—sanction remains.

Consequences

The consequences of having selected the wrong accountability for the job have been enormous for

schools and the children each serves, all predicted in the notion that there are four types of accountability in any organization and they must each play the roles for which they are designed or accountability risks becoming a tool that will work against the stakeholder's needs.

Consider what has occurred since as a result of asking the internal accountability to play a role for which it was never designed. Consider as well that this would have happened *regardless of the metrics selected*. This is important because most blame the selection of predictive testing as the accountability metric as the root cause of the problem. It is certainly a significant contributor as will be shown below and greatly complicates things (as it was designed for a task far removed from judging quality or effectiveness), but the root cause is in the selection of the wrong accountability for the job.

Elevating the internal accountability to the organizational accountability in schools:

- Has contributed to the marginalization of the profession and the professionals in it as effectiveness does not include adherence to professional methods and practices, which are seen as suspect and part of the problem. This is evidenced in the ever-increasing number of educational leaders with no educational background who are presumed to be as capable of leading the profession as the professionals, the lack of appropriate resources for schools, awarding charter schools to people or organizations with no educational experience, etc.
- Has forced a reckoning among educators at the level of personal accountability that chases large numbers of new teachers from the profession and causes the majority of those who remain to consider leaving.
- Creates an inability to communicate where a school is or is not effective by reducing the organizational accountability to an internal accountability that directly represents less than a third of the teaching staff, or in the case of elementary schools, only a portion of what a teachers does. When a school is effective elsewhere that message is only believed if it matches the perceptions reflected in the broader judgments.

- Causes the school as an organization to act as if the judgments made are universal, forcing change with a negative judgment and maintenance with a good judgment. This makes schools less able (often unable) to identify areas of effectiveness and ineffectiveness so they can maintain what is effective and change what is not. No school is ever perfect and very few are abject failures, so to act as if labels of success or failure apply universally is always a mistake.

The practical result of elevating the internal accountability to the organizational level is that schools are less able and less likely to benefit their stakeholders, to solve problems and constantly improve, and to maintain education as a profession than they would be with an actual organizational accountability. The fact that they regularly do these things in spite of, not because of accountability as it currently exists, is a testament to the fortitude of those who choose education as a profession.

The Role of Predictive Tests

No argument on a new accountability is complete without a mention of predictive testing, as testing and accountability are now practically commensurate with one another. This association is counterproductive and needs to be undone.

Predictive test scores⁹ were designed to allow a researcher to view a set of students as of a moment in time to determine who was at that moment ahead and who was behind, regardless of causes (just as Coleman used them in his work). That sort of data set is limited in that no valid judgments can be made if the only information available is a student's place in the resulting ordering, as judgments require a cause to judge.

A student may be well ahead due to educated parents but in a dull and boring school environment that fails to challenge that student. In that case the school cannot be viewed as effective, but rather, just the opposite. Or a student may be well behind due to limited experiences outside school, or a challenging home environment, and the child has remained in school due to a dedicated team of teachers committed to that student's well-being. In that case the school and the student would be inappropriately perceived as ineffective, as they are anything but.

The point is that it would be invalid to assign blind judgments of success or failure to being ahead or behind without a sense of the cause. Knowing who is ahead or who is behind is valuable to a researcher because it allows them to begin to aggregate and understand causes (again, as Coleman did), which in turn suggests remedies and next steps. In the hands of a thoughtful researcher a predictive test is a useful tool when used as one of many tools to better understand the educational process.

Tools that show who is ahead and who is behind as of a moment in time can be created for all sorts of things that happen in schools, such as artistic expression, literacy and numeracy acquisition, musicality, dance, etc. When the thing being analyzed has a correlate to conditions outside school, such as literacy and numeracy acquisition both do, who happens to be ahead or behind as of a moment will likely reflect those conditions. A researcher would take careful note of that and look to see where such patterns had been effectively disrupted, what had been done to create those disruptions, and where lessons existed that could have benefit elsewhere.

What that researcher would not do is suggest that students who were behind should automatically be viewed as failing, and nor should their schools. It may be that real failure is a cause, and if so, it should be addressed. But it may be that students are simply behind. That too must be addressed, but the remedies for being behind and real failure are fundamentally different. To treat them the same puts the students at risk by not providing what any of them actually need.

Policy makers selected predictive testing as the basis for the internal accountability they hoped would hold teachers' feet to the fire and then selected only subjects in which the acquisition of knowledge showed a high correlation to socioeconomics. (This isn't to say that literacy and numeracy are unimportant, but rather, to point out the shortsightedness in such a limited view.) They took as fact that the results from such tests reinforced the prevailing bias that the schools in more affluent neighborhoods were good schools and schools in less affluent neighborhoods were bad schools. The scores for them were simply blunt reflections of success or failure, even prior to any search for causes.

The fact that predictive tests produce relatively stable results over time was also appealing, since they would produce consistent judgments over time in line with the prevailing biases. What would not have been believed was a system that showed rich and poor communities each having schools that were effective and schools that were not, even though that was probably true. But it would not have matched their expectation, and without a meaningful organizational accountability there was little opportunity to argue for anything else.

The policy choice to have an internal accountability serve as the organizational accountability was in and of itself a bad choice, one that on its own would have prevented them from achieving their policy goals. But the selection of a test designed to show who is ahead or behind as of a moment, limiting that selection to subjects with a correlation to the socioeconomic conditions in a community, and passing judgments without and prior to evidence, all but guaranteed that would happen and then make it difficult to see why.

This difficulty in seeing through all of this is due to the fact that the selection of predictive testing as the primary accountability tool has thrown up a set of smokescreens that mask the larger issues and keep the focus elsewhere.

The first is that most arguments about an improved accountability are about a better test, or a better set of formulas into which to insert test scores. Either leaves intact a misplaced accountability system that would exist regardless of the chosen test or formula.

The second acknowledges that the selected subjects and their acquisition do have a correlation to socioeconomics so accountability should not be about where you are on a test, but how much your scores have grown. Technically, determining how to view growth through the lens of state tests is extremely challenging, with states subsequently spending millions of dollars and huge amounts of bandwidth and infrastructure to come up with ways to do it (and the results are still deeply suspicious given the machinations required to get there).

But even if you could accurately view movement over time it cannot be automatically judged as reflecting a good or bad practice by the school: only the *causes* for the movement can, and if premature judgments are made this is as invalid as blindly equating being behind with failure. While

the idea of “growth” feels to most everyone like an appropriate place to base accountability, that feeling continues to mask the fact that school accountability was never properly done in the first place.

The third smokescreen is the fact that the scores from such tests are believed to confirm the prevailing bias that schools in more affluent neighborhoods are good schools and schools in less affluent neighborhoods are bad schools. Suggesting that the current accountability fails to identify effectiveness in schools runs right into this bias. Pointing out how illogical it would be to think that schools in poorer communities are almost all bad schools while those in wealthier communities are almost all good looks from the outside like excusing failure on the part of bad educators (in bad schools in poor neighborhoods) because you don’t like what the current system says. It becomes a conversational non-starter to argue the more accurate view that there are likely effective and ineffective schools in every neighborhood, but test scores are an inadequate tool with which to see it.

The more those looking for a better system focus on the smokescreen and not on the root of the problem, which is finally putting in place a meaningful organizational accountability, the less likely they are to solve the problem. This is why it is highly unlikely that finding a better accountability will be accomplished by policy makers, who seem to believe they have the right approach and need only find the right set of formulas that will bring everything in line.

Conclusion

Organizational accountability in effective organizations is performed by the professionals in that organization with a deep understanding of their fields. The audience is the external stakeholders, who are non-experts, non-practical in their understanding, and lack the methodological and technical expertise of the professionals

The purpose is to create a knowledge development and transmission system that can

communicate to those stakeholders where the organization is and is not effective, which requires professional knowledge to do. Policy will certainly one day figure into all of this given the importance of the public school in society and policy makers’ role as critical stakeholders, but policy is the wrong venue from which to invent a solution that at its core requires a deep professional understanding.

The True Accountability movement is attempting to remedy the glaring series of errors committed over the past thirty years by building True Accountability Systems that properly place the organizational accountability. Only then can each of the other accountabilities function as designed and public education function at the professional level it must to properly serve the nation’s children and its long-term interests. Only then can we finally begin to understand where our schools are effective, where they are not, and where to focus our energy and efforts.

This is why True Accountability is different. It is not anti-anything, nor is it about beating up on the past to achieve some sort of temporary catharsis. And it is certainly not an opportunity for a school to award itself a participation trophy and call it accountability.

Rather, it is a deeply positive effort, one that will reveal more about a school to its community than ever before, empower the profession, support all students, and finally allow for an environment where continuous improvement is actually possible.

The Call

The unambiguous purpose of this white paper is a call to action to solve one of the most recalcitrant problems public education has ever faced. Already thousands of our colleagues are engaged in efforts to do just that. While still a nascent effort it is now far enough along to be called a movement.

My sincere hope is that you join us.

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Feb 2, 2020
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¹ The idea of a knowledge development and transmission system comes from Phil Schlechty’s work on the capacities required for a school to become a transformative organization. While this concept has long been a part of the True Accountability work, Phil’s notion of systems describes the concept far more succinctly than our original work, which is why we have borrowed the concept.

² Hill, H., (2016). "50 years ago, one report introduced Americans to the black-white achievement gap. Here's what we've learned since." Downloaded from Chalkbeat at <https://chalkbeat.org/posts/us/2016/07/13/50-years-ago-the-coleman-report-revealed-the-black-white-achievement-gap-in-america-heres-what-weve-learned-since/>.

³ Coleman, J. et.al., (1966). *Equality of Educational Opportunity*. U.S. Department of Health, Education, and Welfare. Washington, DC. Downloaded from <https://files.eric.ed.gov/fulltext/ED012275.pdf>.

⁴ It is worthwhile noting that due to white flight from urban schools in response to desegregation the conditions Coleman hoped for were not realized through the mechanism of forced busing, and in 1975 he declared it a failed policy.

⁵ Gardner, Richard, et.al., (1983). *A Nation at Risk: The Imperative for Educational Reform* (Washington D.C.: The National Commission on Excellence in Education. Retrieved from yeah amen my point is not for us to work through

⁶ Gardner, Richard, et.al., (1983). *A Nation at Risk: The Imperative for Educational Reform*. Washington D.C.: The National Commission on Excellence in Education.

⁷ Huelskamp, R. M. (1993). "Perspectives on Education in America." *Phi Delta Kappan*, 74(9). Retrieved from <https://www.questia.com/read/1G1-13766450/perspectives-on-education-in-america>

⁸ Babones, S. (2015). *Sixteen for Sixteen: A Progressive Agenda for a Better America*. Bristol, England: Policy Press, University of Bristol.

⁹ Predictive tests make up a specialized family of tests that include the SAT, ACT, commercially available norm-referenced tests such as the MAP and the Iowa Test of Basic Skills, and every state test used for accountability purposes. Each of these tests is based on a scale that orders test takers from the furthest below to the furthest above average as of a moment in time against a narrow aspect of a domain similar to what would happen should the test cover the entire domain. It does so such a way that scores at the aggregate and at the individual student level are reasonably consistent over time. Some tests, such as the commercially available tests, often add norms which can offer up additional opportunities for interpretation. The term *criterion-referenced* is after presumed to indicate an entirely unique development process as opposed to norm-referenced tests, but this is largely false. While the content being tested differs, the development processes is surprisingly similar, with norms being added only after a test is complete.