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*This chapter describes the framework and implementation of a program accountability system in a statewide initiative (South Carolina First Steps to School Readiness), which was developed (1) to enable practitioners to provide evaluation information required by legislative mandate and (2) to develop the capacity of practitioners to systematically plan their program, implement with quality, and self-evaluate. The components of this program are reflected in its name: Planning, Implementation, and Evaluation (PIE). The chapter describes PIE in relation to program theory, usage, and efforts to mainstream.*

## PIE à la Mode: Mainstreaming Evaluation and Accountability in Each Program in Every County of a Statewide School Readiness Initiative

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Federal and state legislative requirements increasingly demand evaluation and accountability for treatment, prevention, and education programs (for example, the Government Performance and Results Act of 1993). In addition, funders of nonprofit agencies, such as the United Way and local and national foundations, are requiring specific evaluation plans to measure program outcomes (United Way, 1996). As a result, practitioners such as teachers, preventionists, and health care providers are under increasing pressure to evaluate their efforts and demonstrate outcomes. Yet negative experience or lack of experience with evaluation has led practitioners to resist or marginalize evaluation (Northwest Regional Educational Laboratory, 1999). In these cases, practitioners do not receive potentially valuable evaluation data that can be used to improve and sustain programs.

In this chapter, we describe the framework and implementation of a program accountability system for the initiative, South Carolina First Steps to School Readiness (First Steps). The accountability system was developed to *both* (1) enable practitioners to provide evaluation information required by legislative mandate and (2) develop the capacity of practitioners to systematically plan their program, implement with quality, and self-evaluate. The

components of this program are reflected in its name—Planning, Implementation, and Evaluation (PIE)—and they are central to the development, implementation, and evaluation of each program in every county. PIE tools and processes were eventually used to inform program effectiveness reports that were then used to evaluate the first three years of the First Steps initiative.

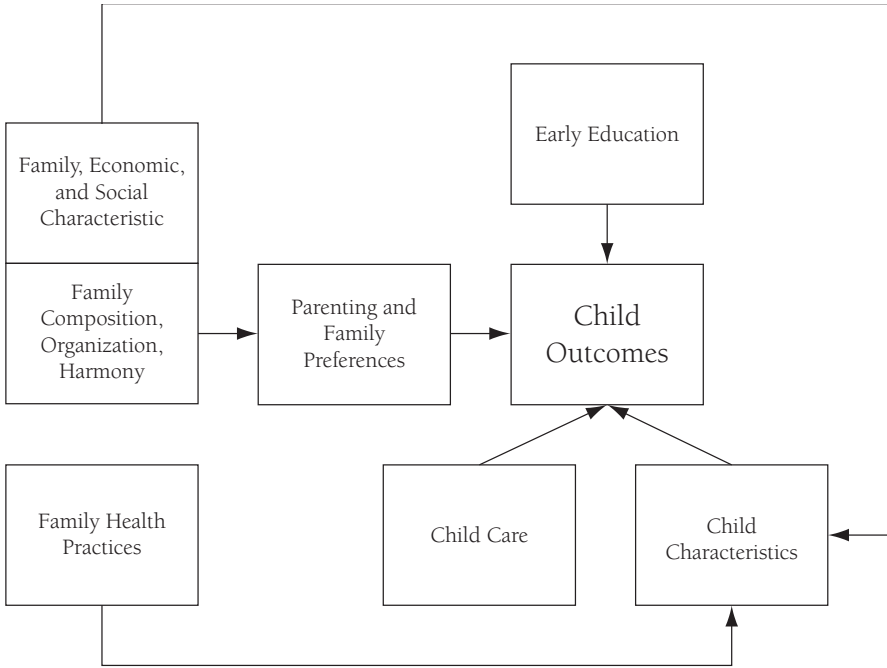
### **Model of the Problem**

The link between insufficient school readiness and adverse outcomes has received increased attention in recent years. *School readiness* has been defined as a set of capabilities that all children need before entering school. The National Education Goals Panel and the National Association for the Education of Young Children (NAEYC) believe that school readiness needs to recognize individual variation and diversity, inequities in opportunities and access to resources, and the need for appropriate expectations (Kagan, Moore, and Bredekamp, 1995; National Association for the Education of Young Children, 1995).

In order to promote school readiness, many states (for example, North Carolina, California, West Virginia) have developed programs targeting the environmental, physical, and educational factors influencing rates of readiness. South Carolina's statewide initiative was proposed to improve low rates on a variety of indicators of school readiness. A 1999 study revealed that approximately 19 percent of all South Carolina children entering the first grade were "not ready," according to scores on the Cognitive Skills Assessment Battery administered to South Carolina school children. In addition, approximately one-third (33 percent) of South Carolina's kindergartners were rated deficient in Emotional Maturity and Social Confidence; nearly one-half (46 percent) were rated deficient in General Knowledge, and two-thirds (66 percent) were rated deficient in Early Language Skills (Boyer, 1993).

School readiness, as defined by First Steps, encompasses multiple dimensions of learning and development. These dimensions include health and physical development, emotional well-being and social competence, approaches to learning (for example, curiosity, independence, cooperation, and attention), communication skills, cognition, and general knowledge. In order to thoroughly understand the problem of poor school readiness, it was necessary to develop a logic model that reflected the connections among the conditions that contributed to the need for a program, the activities aimed at addressing these conditions, and the outcomes and effects that were expected to result from the activities (Julian, Jones, and Dey, 1995; McEwan and Bigelow, 1997). Goodman and Wandersman (1994) developed a formative evaluation approach called FORECAST that highlights the use of a model of the problem and a model of intervention (or model of the solution). Using this approach, a conceptual model called a "model of the problem" was created to describe the links among all the factors that contribute to the problem of school readiness. In addition, a second model was developed that

**Figure 4.1. Model of the Problem: Major Domains of Influence on Child Outcomes**



incorporated elements of and logical steps toward a solution. Logical links among various stages and factors form the foundation of these models.

The First Steps model of the problem borrows from an immense birth cohort study (Moore and others, 1999), which is following approximately fifteen thousand children longitudinally from birth through first grade. The study hypothesizes determinants (dimensions) that predict positive and negative child outcomes. The determinants are defined by the First Steps effective practice experts as Early Education, Child Care, Health, Parent Education, Family Strengthening, and Transportation. The South Carolina model of the problem of school readiness used the determinants as predictors of positive and negative child outcomes, which, in turn, predict school readiness (see Figure 4.1).

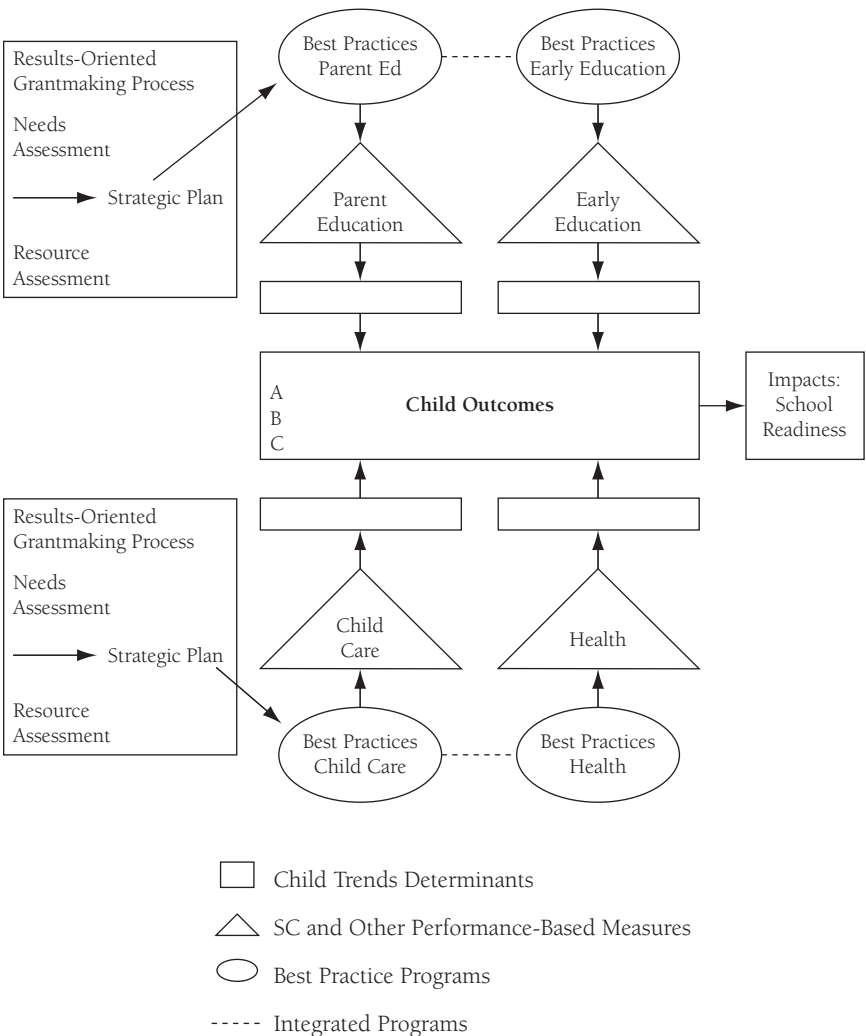
**Model of the Solution**

The First Steps initiative was developed to address alarming educational statistics in the state of South Carolina. First Steps is a comprehensive, results-oriented, early childhood education initiative designed to help South Carolina’s families ensure that their children reach first grade ready

to succeed. The initiative is grounded in the assumption that partnerships among key stakeholders involved with young children within each county will improve school readiness if they consider collaborative strategies to bring about positive changes in the six determinants of school readiness (see Figure 4.2).

The First Steps initiative was created by enabling legislation enacted on June 28, 1999. The legislation outlines the purpose and the process of the initiative. In program theory terms, the legislation provides a model of the solution or a theory of change (Weiss, 1995). The legislation provided funding

**Figure 4.2. Model of the Solution: First Steps Grant Implementation Process**



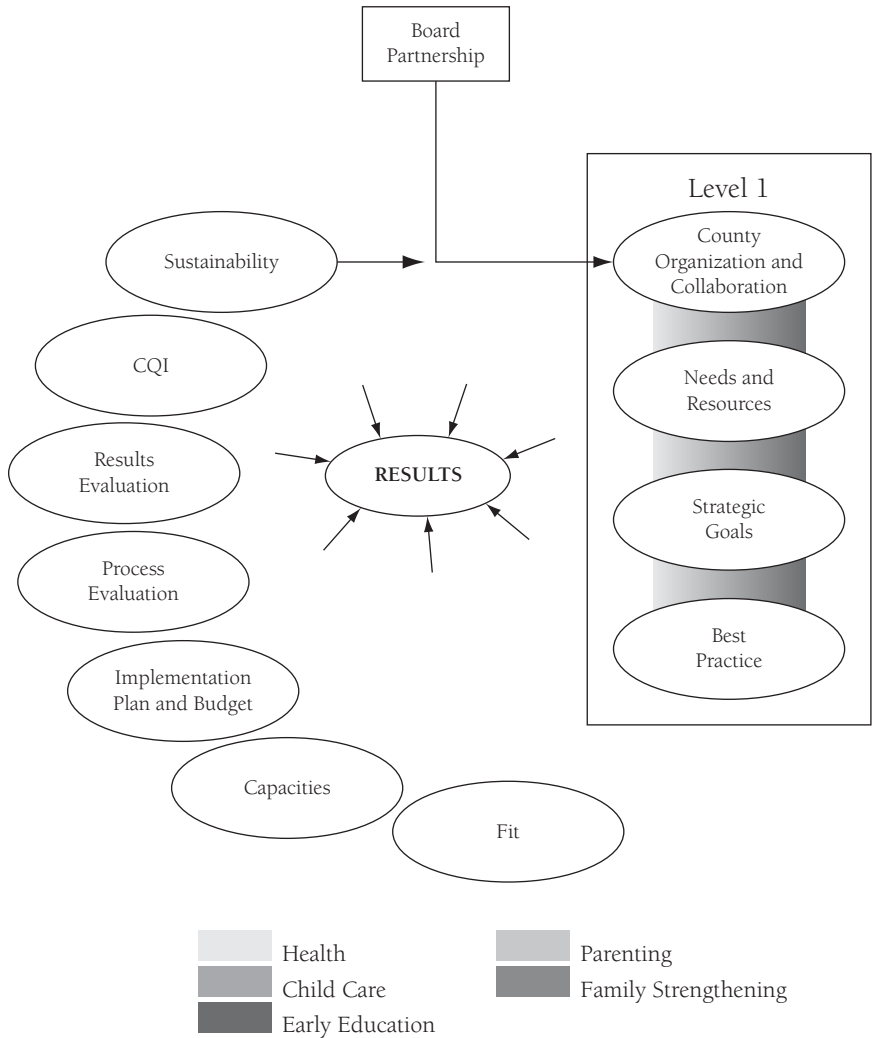
(\$20 million for the first year and \$30 million each year thereafter) and specified how each of the forty-six South Carolina counties could access a portion of that funding: each county would have to form a First Steps county partnership board, composed of local representatives from diverse interest groups and organizations in that county.

The First Steps legislation describes a two-step process by which counties apply for and receive grants for planning and implementing their school readiness strategies. There was an uncanny fit between the legislation and “Getting To Outcomes” strategies for comprehensive quality programming designed to guide self-evaluation (Wandersman, Imm, Chinman, and Kaftarian, 2000). *Getting To Outcomes* (GTO) guides practitioners through the critical steps needed to implement quality programs. The GTO process consists of ten accountability questions, the answers to which serve as a beginning guide to successful planning, implementation, and evaluation of programs. The ten questions are as follows:

1. What are the underlying needs and conditions that need to be addressed?
2. What are the goals, target population, and objectives?
3. What science- or evidence-based models and best practice programs can be useful in reaching the goals?
4. How will the program fit with existing programs already being offered, the organization’s mission, and community values?
5. What organizational capacities are needed to implement this program?
6. What is the plan for this program?
7. How will the program be implemented with quality?
8. How well did the program work?
9. How will continuous quality improvement strategies be incorporated?
10. If the program is successful, how will it be sustained?

These ten questions were the basis of the two-step grant application process that met the mandates of the First Steps legislation (see Figure 4.3). The initial phase, Level I, provided counties with resources to develop a collaborative effort, conduct a needs and resource assessment, identify and prioritize gaps, and initiate a strategic planning process geared toward improving school readiness. Upon development of their strategic plans, boards applied for implementation grants in the next phase, Level II. Funding was provided to partnership boards, contingent on the development of high-quality strategies that provided services to improve school readiness. The boards were directed to use science and best practice interventions that would change determinants and produce positive child outcomes. The increase in positive outcomes would consequently support improvements in school readiness. After receiving their Level II funds, counties proceeded to implement their First Steps programs and strategies.

**Figure 4.3. Accountability Questions and the First Steps Grant Process**



**First Steps Evaluation and Accountability**

In addition to outlining the formation of county partnership boards and their activities, the First Steps legislation referred directly and indirectly to the accountability and evaluation of programs. For instance, each county partnership board was required to form a collaborative partnership and maximize resources before it received funding for the implementation-management grants. First Steps legislation additionally required the county partnerships to develop internal evaluation procedures to assess partnership

functioning, program implementation, progress toward interim goals, client satisfaction, and cost savings attributable to increased efficiency and effectiveness of the new services. These elements, along with recommendations for changes, are required to be reported to the legislature annually over the initial seven years of the initiative. According to section 59–152–160A: “The South Carolina First Steps to School Readiness Board of Trustees shall establish internal evaluation policies and procedures for County First Steps Partnerships for an annual review of the functioning of the partnership, implementation of strategies, and progress made toward the interim goals and benchmarks.”

Further, Section 59–152–70 indicates that the partnership boards must collect information and submit annual reports to the First Steps board of trustees. The requirements of the annual report were clearly delineated in the legislation. The legislation required that the county board submit an annual report that includes (but is not limited to) information regarding

- The current level and effectiveness of services for children and families
- Strategic goals
- Monitoring of progress toward strategic goals
- Report on implementation of activities
- Recommendations for changes to the strategic plan
- Evaluation and report of program effectiveness and client satisfaction before, during, and after the implementation of the strategic plan
- Estimation of cost savings attributable to increased efficiency

The priority of results and accountability in the legislation was clear. The legislative intent and requirements were consistent with theory and practice in community development (Fawcett and others, 1995), empowerment evaluation (Fetterman, Kaftarian, and Wandersman, 1996), evaluation of health and human service programs in community settings (Telfair, Leviton, and Merchant, 1999), and results-oriented grantmaking (Yost and Wandersman, 1998) for effective programs. These literatures suggest that building the evaluation capacity of practitioners to incorporate approaches and tools of evaluation into programming leads to more effective programs.

The goal of empowerment evaluation is to improve program success. By providing program developers with understanding and tools for assessing the planning, implementation, and results of programs, program personnel have the opportunity to improve planning and implementation of programs and thereby increase the probability of achieving results [Wandersman, 1999, p. 96].

It was anticipated that counties would benefit from a standardized, yet adaptable, system to assist them in systematically collecting, organizing, and reporting data and program information necessary for planning and implementing programs.

**The PIE System.** A comprehensive program accountability system was needed to guide the county partnerships in planning and implementing their programs by helping them collect, organize, evaluate, use, and report this information and results for program improvement and accountability purposes. Most important, a practitioner-friendly approach was required, as each county would have significant responsibility for conducting evaluation activities, and funding for professional external evaluators was limited. The PIE system builds on approaches and tools consistent with participatory (Cousins and Earl, 1992; Mathison, 1994) and empowerment evaluation (Fetterman, Kaftarian, and Wandersman, 1996).

PIE helped all forty-six counties participating in First Steps do the following:

- Plan a variety of school readiness programs across the six areas outlined in the legislation
- Implement these programs with high quality
- Conduct their own evaluations with support from personnel, called PIE consultants, hired by the Office of First Steps to support the county boards

Tools and processes for PIE were developed in collaboration with a network of local effective practice experts in each of the determinant areas of intervention targeted by First Steps. This effective practice network (EPN) was an integral part of the PIE process—editing and approving evaluation plans and providing advice and guidance on an ongoing basis. An overarching purpose of the introduction of PIE into the First Steps process was to standardize assessment and evaluation tools across the state of South Carolina. In this way, data could be aggregated and compared easily. Central features of the PIE system are the PIE shell, the PIE workbook, and the *PIE Trainer's Manual*, which is used in consultation with a PIE consultant.

**PIE Components.** Major bases of ideas for tools in PIE were manuals titled *Prevention Plus III* (Linney and Wandersman, 1991) and *Getting To Outcomes* (Wandersman, Imm, Chinman, and Kaftarian, 2000). These manuals use an empowerment evaluation approach and contain tools for planning, process, outcome, and impact-evaluation for substance abuse prevention programs. The approaches were developed to teach people at the local level the basics about planning and implementation and conducting elementary evaluations of their own programs. PIE uses the latest iteration of these materials to stimulate analytical thinking about the ways programs might produce outcomes, realistic thinking about the possible effects of any program, and careful planning for the implementation of any program.

**PIE Shell.** In contemporary usage, PIE “a la mode” is interpreted as a piece of pie with ice cream on top. The literal translation of the French *à la mode* is “in the style” or “in the fashion.” This translation is in keeping with

the customizable nature of the PIE components and PIE process. The PIE shell was designed to be flexible and comprehensive enough to account for the variation in the school readiness programming that was to be present across all forty-six counties during Level II, yet it was also designed with a degree of standardization that allows for aggregate reporting across the entire state, within-state comparisons, and linkages to the external evaluation required by the First Steps legislation. In brief, PIE shells are standardized and customizable.

The PIE shell is a worksheet that provides a format for guiding program staff through and documenting each step of the three-step (planning, implementation, and evaluation) process. The planning step was designed to assist the partnership boards or program personnel in articulating several aspects of their approach to improving school readiness. Specifically, the planning section of the PIE shell prompted users to identify and describe the goals and purposes, target population, objectives, collaboration partners, activities, integration efforts, outputs, budget, and cost savings. The planning section assisted counties in meeting the legislative requirement of documenting strategic goals. This section also laid the groundwork for other legislative requirements.

In the implementation step of the PIE shell, practitioners kept a running record of progress, problems, and lessons learned for each of the elements recorded during planning. Practitioners could document the extent to which they achieved elements of their plan. This information could also be used as an impetus for altering aspects of a program in order to improve the likelihood of achieving results. By monitoring activities and progress related to the program plan, programs fulfilled legislative requirements for monitoring the level and effectiveness of services for children and families, monitoring progress toward strategic goals, and producing a report on implementation of activities.

The evaluation section mirrored the implementation section but allowed for interim and final summation of progress gleaned from the implementation section of PIE. Completing the evaluation section assisted the counties in meeting the legislative mandates regarding cost-effectiveness and cost savings, as well as reporting progress toward their stated goals.

The PIE shell fulfilled three basic needs of a program accountability system for First Steps:

1. Program Level: Provided structure and tools necessary to facilitate data collection, analysis, and local feedback for a broad range of program types
2. County Level: Provided the county board with a system for evaluating how well different types of programs were influencing school readiness within a county
3. State Level: Provided a system for developing a knowledge base regarding best practices in promoting school readiness and answering

state-level questions about the effectiveness of interventions in different determinant domains

**PIE Workbook.** The PIE workbook provided basic instructions for using the PIE system and examples of PIE shells that had already been completed for a variety of school readiness programs the counties were likely to implement. Therefore, counties have an example to follow when considering the implementation of programs that have already been “shelled.” In addition to the basic instructions and completed PIE shells, the workbook included an introduction to program evaluation and information about science and best practice standards for effective programs. The PIE workbook was designed to be expandable, allowing for inclusion of new PIE shells as they were being developed for different county programs. Counties considering the implementation of programs that had already been shelled benefited from information in the completed shells when developing PIE shells for their own program.

**PIE Trainer’s Manual.** The *PIE Trainer’s Manual* was designed to assist PIE consultants working directly with each county partnership board and their programs and other key First Steps personnel with the PIE process. The manual describes the activities and steps to follow when consulting with board members or practitioners. These steps ranged from precontact background research to initial visits to completion of PIE shells.

**PIE Process.** Using the general framework of PIE and the *PIE Trainer’s Manual*, the PIE team of consultants worked closely with members of each county partnership board, county First Steps staff (executive director and assistants), and staff from specific programs to ensure that the PIE process was introduced and worksheets customized to best promote accountability. The consultation process and implementation of the PIE system varied considerably according to a county’s grant application status, that is, when they received their funding and were allowed to proceed with the implementation of their programs. PIE consultants and effective practice experts worked together to ensure that customized PIE shells fit with knowledge regarding best practice.

**PIE Consultants.** PIE consultants were the frontline workers of the PIE process. Employed by the Office of First Steps through a contract with the Institute for Families in Society at the University of South Carolina, PIE consultants provided training in collaboration with the county partnership boards, county First Steps staff, and program practitioners. Each county had a PIE consultant assigned to it with the two full-time consultants working in ten counties each and the remaining half-time consultants working across the rest of the state.

**Effective Practice Network.** Content experts in each of the dimensions of school readiness provided a deeper knowledge base from which to draw when tailoring PIE shells to the needs of individual counties. These experts were retained by the Office of First Steps for consultation directly

with the counties through the PIE consultants. Members of the EPN were tapped previously by First Steps to develop papers on effective practice to assist in the development of county strategic First Steps plans. The operation of the PIE system required that the program staff and county board members provide data to the Office of First Steps and that PIE consultants and members of the EPN would provide a great deal of personalized technical assistance.

## **PIE and County Stages of Development**

At full scale, we expected that there would be approximately four hundred programs operating each year with funding from First Steps. As is often the case with initiatives of this scope, the programs began running before sufficient resources and preparation were put in place in order to bring the project to scale. As a result, PIE was introduced to county boards in two distinct stages of development: (1) Level II Approved Counties and (2) Counties Preparing Level II Applications. Just as the First Steps initiative was mandated for political reasons to go to scale sooner than it was ready, so too was the PIE system.

**Level II Approved Counties.** PIE shells were customized to meet specific requirements for each program or strategy. With county partnerships that had already received Level II funding, a PIE consultant met with county representatives to (1) provide an overview of the general accountability concepts behind PIE to the county partnership members and program staff, (2) gather more specific details about the proposed programming (for example, more specifics than may be present in the Level II grant application document), and (3) collaboratively develop a system within the general PIE framework to facilitate the planning, implementation, and evaluation of their programs. The initial entrée of the PIE consultant was made into a county through the Office of First Steps technical assistant assigned to that county. The PIE consultants were in constant and ongoing communication with county partnership board members, county First Steps staff, or specific program staff throughout the PIE process. In an empowerment evaluation framework, the success of program personnel in adopting and implementing a PIE type of system requires ongoing coaching and mentoring, as well as guidance and motivation from the evaluation coach—in this case, the PIE consultant.

**Counties Preparing Level II Applications.** PIE was designed to be part of the strategic planning process from the beginning to ensure that evaluation was built into the plan for each program or strategy in every county. When counties completed their needs and resource assessments and were in the process of identifying gaps in service needs and developing a strategic plan, the PIE framework helped the counties develop strategic plans and Level II applications that met legislative requirements for approval. PIE consultants worked with counties in the process of strategic planning (1) to

provide an overview of the general accountability concepts behind PIE to the county partnership board members, county First Steps staff, and program staff, and (2) to collaboratively develop a strategic plan for school readiness initiatives within the general PIE framework.

Because all of the counties were using the same First Steps PIE system (PIE documents, PIE consultants), the data collected from the programs in each of the partnerships could be aggregated for statewide reporting and within-state comparisons. In addition, the data collected could be linked to the external outcome evaluation so that the effectiveness of different services and dosages could be examined in relation to the final outcomes of school readiness.

**Counties Using PIE to Fulfill Reporting Requirements.** Although PIE was designed and used to guide nonevaluators through a program accountability process, its utility and flexibility were manifested when counties were asked to produce program effectiveness reports (PERs) as part of the statewide external evaluation of First Steps. At the beginning of 2003, an evaluation report was due to the South Carolina General Assembly; in part, this report was to be produced with information gathered in the PERs. With the advent of the PERs, the PIE consultants' attention was immediately directed away from the PIE process, and they were given less than six months to help counties produce a report for each First Steps funded program. When the 100-item, ten-page PER template was introduced to the counties, their immediate response, predictably, was one of shock. This new requirement posed a daunting, unexpected, and unwelcome task for counties that had limited resources in time and personnel. Concerns were allayed when the PIE consultants showed counties that many of the items could be addressed through information they already had in their PIE documents, especially the information contained in the P and I sections. Unfortunately, some counties received Level II allocations in the later rounds of First Steps funding; these counties did not benefit from thorough PIE consultations because of the unexpected move to PERs and thus had to generate data they did not already have.

### **How PIE Overcomes Common Barriers to Evaluation**

The term *mainstreaming* is used frequently in education, referring to the education of students with disabilities in the same environments as people without disabilities. The process of integrating marginalized students with disability into the general population of a school was initiated largely through legislative mandate (for example, the Individuals with Disabilities Education Act amendments of 1997) and was greeted with resistance. *Mainstreaming*, then, refers to making something (students or evaluation) an integral part of the daily professional responsibilities of an organization. Mainstreaming evaluation means making it a central part of good programming, as opposed to a marginalized activity. In his presidential address to the

AEA, Sanders (2001) defined mainstreaming evaluation as “the process of evaluation activities becoming an integral part of the everyday operations of an organization” (p. 1). He distinguished among *capacity building* (improving the quality of evaluation and its use), *institutionalizing evaluation* (committing formally to evaluation in policy and procedures), and *mainstreaming evaluation* (internalizing and acting on evaluation as a value).

Evaluation as a core organizational value is wholly consistent with our stated practice and philosophy of empowerment evaluation (see Wandersman and others, forthcoming). The principles of empowerment evaluation propose that building capacity and institutionalizing evaluation are some of the key ingredients of empowerment evaluation. In the case of First Steps, evaluation was institutionalized from the start in the language of the legislation and in early commitment to develop suitable tools and processes for evaluation. As stated previously, capacity building was a primary responsibility of the evaluation consultants. In addition to building technical skills required to self-evaluate, a key consideration in PIE processes involved reducing fears about evaluation on the part of program participants and other key stakeholders. The term and concept of mainstreaming captures well the aims and purposes of empowerment evaluation and the PIE system.

As with mainstreaming in education, mainstreaming in evaluation is likely to be met with resistance and fear. According to the Northwest Regional Educational Laboratory (1999), some common complaints and fears about program evaluation are

- Evaluation creates anxiety among program staff.
- Staff may be unsure about how to conduct evaluation.
- Evaluation can interfere with good program activities or compete with services for scarce resources.
- Evaluation results can be misused and misinterpreted, especially by program opponents.

Next, we discuss ways that PIE was designed to address four barriers to mainstreaming evaluation: (1) anxiety, (2) uncertainty, (3) costs, and (4) misuse.

**Anxiety.** PIE attempted to ease practitioners’ anxieties about evaluation by providing them with an effective program accountability system and by empowering individuals with the tools and responsibility for program evaluation. The PIE process, by framing evaluation as part of good programming and training practitioners in evaluation techniques, attempted to move the process of evaluation from the margins into the mainstream. The empowerment evaluation approach decreased anxiety associated with evaluation by placing considerable control for evaluation in the hands of the practitioner.

It has been the experience of PIE consultants that the typical practitioner’s initial resistance is based on undernourished evaluation capacity.

When confronted with the prospect of evaluating a program, the practitioner attempts to evaluate the whole thing at once rather than break a program into various components. PIE consultants worked with practitioners to systematically deconstruct a program into critical elements that can be evaluated. Breaking programs down into their smaller, measurable parts reduced practitioners' fears.

**Uncertainty.** In terms of uncertainty about how to conduct an evaluation, the response to the PIE system and PIE process was very positive. One PIE consultant reported: "I have found in nearly all cases that program folks already *know* how to evaluate their program, they just don't know that they know until I asked questions, prompted by the PIE shell, that were a little more in depth. . . . Once they really looked at what they were doing. . . . they were able to figure out. . . . what to measure, why it needs to be measured, and how to measure it." PIE provided systematic structure and ongoing technical assistance to guide practitioners through the evaluation process. Some county board members, who represent other agencies or organizations, carried the principles of program accountability to their own programs as a result of exposure to PIE.

**Costs.** Although evaluation costs may compete with the cost of services, we take the stance that they are not separate from programming costs. The costs associated with PIE are actually costs that are part of good programming. First Steps legislation required that counties provide information regarding cost avoidance associated with each program. *Cost avoidance* refers to the reduction in future expenditures that can be attributed to the direct results of an initiative (for example, the cost of incarceration for every juvenile for whom incarceration was prevented). Cost avoidance cannot be calculated without measuring the extent to which a program has achieved its stated goals. Money spent for this type of evaluation can lead to future savings, as less funding may be wasted on inefficient or ineffective programs.

**Misuse.** Because the local practitioners will be directly involved in all aspects of the evaluation process, they will be in a better position to prevent evaluation information from being misused or unused. For instance, they will have an intimate knowledge of all the evaluation information that is generated from the program by using the PIE framework and, as a result, will be able to respond appropriately to critiques of the program with systematic and objective information. In addition, PIE provided a process for self-correction and, though no program accountability system can guarantee results, using the results-based PIE process increases the probability of achieving results.

## Conclusion

Organizational cultures exert influence on practitioners' concerns about anxiety, uncertainty, costs, and misuse. In addition to the need to assist practitioners in overcoming their fears and complaints about evaluation,

effective mainstreaming of evaluation can only be achieved within an organizational structure that embraces evaluation. By making evaluation a part of the total process of planning, implementing, and evaluating programs with quality, we are infusing evaluation-friendly traits into the institutional culture of First Steps. Bringing together representatives from a mixture of agencies and interests promoted increased cross-talk among practitioners as part of the process of customizing PIE shells. As a result, the PIE process promoted sharing information and resources.

In sum, PIE was a central part of the First Steps program process and represented a systematic effort to make evaluation a standard practice of good programming. The PIE system was used in planning, implementing, evaluating, and reporting. PIE was used to promote accountability at the program level, the county level, and state level. It helped the State Office of First Steps and county boards to fulfill their responsibilities to the legislature, according to the First Steps strategic plan. We see PIE in First Steps as PIE à la mode (shaped to fulfill many of the requirements for accountability), not as PIE in the sky.

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