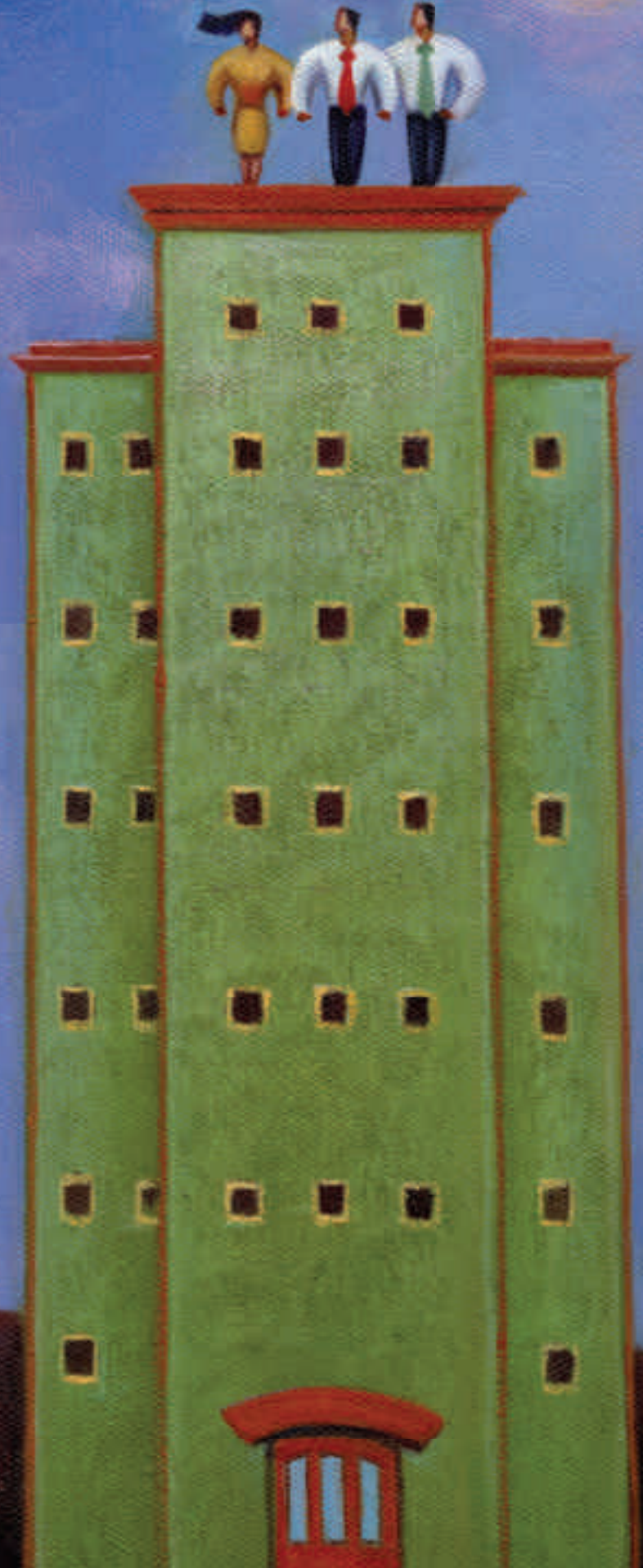# nacsa
NATIONAL ASSOCIATION OF CHARTER SCHOOL AUTHORIZERS

Anecdotes Aren't Enough:

AN EVIDENCE-BASED APPROACH TO ACCOUNTABILITY FOR ALTERNATIVE CHARTER SCHOOLS

Anecdotes Aren't Enough:

AN EVIDENCE-BASED APPROACH TO ACCOUNTABILITY FOR ALTERNATIVE CHARTER SCHOOLS

Table of Contents

STATE EDUCATION OFFICIALS CALL THE "FAILING" DESIGNATION UNFORTUNATE FOR SCHOOLS DEALING WITH SPECIAL STUDENTS, BUT THEY SAY THEY ARE BOUND BY THE LAW TO LUMP THE SCHOOLS IN WITH OTHERS THAT REALLY ARE HAVING ACHIEVEMENT PROBLEMS:

"Some of the schools on the 'failing' school list have made strides larger than most schools that aren't on the list... but because we are duty-bound to follow the strict letter of the law, schools that would otherwise never be considered failing are being labeled as failing. These schools are another perfect example."

"New Alabama law labels special schools as 'failing'"
Education Week, July 23, 2013

Key Recommendations for Authorizers

Set a high bar. Identify schools for alternative accountability based on whether a school has a large percentage of students with extraordinary learning difficulties, acute risks to their ability to succeed, or a documented history of academic failure that leaves them significantly far behind their age group in high school credits.

Be open to different but detailed approaches. Make sure that application processes and documents indicate openness to alternative methods and scheduling. Require specific plans for measuring student progress and school performance. Proposed budgets should reflect additional costs such as counselors and service providers.

Make the charter contract the central instrument of accountability. Whether the state creates specific accountability policies for alternative schools or not, authorizers should create charter contracts that form a solid basis for evaluating the alternative charters in their own portfolios. The contract should spell out academic and non-academic goals, as well as the specific metrics that will gauge the school's performance, including both traditional and non-traditional measures.

On critical indicators of performance, authorizers should:

- Establish proficiency targets that reflect students' starting points; evaluate results according to an appropriate comparison group, such as alternative schools serving similar populations and grades.

- Expect schools to administer "short-cycle" assessments that look at student learning at the beginning and end of a given school year, and perhaps several times mid-year, to establish their academic growth.

- Evaluate graduation rates over a longer period of time than the conventional four-year cohorts, and give schools credit for re-engaging students who have dropped out.

- Weigh attendance and truancy in light of students' rates at prior schools.

- Look at multiple measures of college and career readiness, including the ACT and SAT tests, industry certifications, and if possible, actual postsecondary student success.

Introduction: Authorizers and "Alternative" Charters

Among the keenest challenges faced by charter school authorizers is how to make sound decisions about charters that serve students at exceptionally high risk of academic failure—particularly "alternative" charter schools whose explicit mission is to educate youth who have dropped out, are embroiled in the juvenile justice system, have histories of substance abuse, or have faced other disruptions in their schooling.[1]

The reality of alternative charters is that their students typically do not perform at the same level as their peers on standard measures of achievement—at least not when the students enter these schools and perhaps for some time after. The schools often use different approaches to time, course completion, and graduation requirements than those that serve mainstream students. On all of the typical measures used in state accountability systems—such as proficiency rates, four-year adjusted cohort graduation rates, attendance, and even re-enrollment rates—alternative schools will often compare poorly to schools serving traditional populations.

A conscientious authorizer doesn't accept excuses for poor performance from any charter school—yet these schools are among the few that can justifiably say "our kids are different" and where conventional accountability measures fail to tell the story of what the school is doing to serve them.

These schools are among the few that can justifiably say "our kids are different" and where conventional accountability measures fail to tell the story of what the school is doing to serve them.

The problem becomes especially acute when high-stakes decisions are involved. Too often the school and authorizer approach renewal season without a clear understanding of what renewal will take, what evidence will count, and where the bar will be set.

The authorizer's dilemma reflects in part the sorry state of accountability for alternative public schools more generally. Few states have anything resembling a coherent policy or system to identify such schools and measure their performance. The default position often falls somewhere between unmerited interventions and no accountability at all. Acting in this void, an authorizer may lack evidence to show that a dropout-recovery school is doing solid work despite low proficiency scores on the state tests. And an authorizer who suspects that another such school is just an academic waiting room where no learning is happening doesn't have the consistent, coherent evidence needed to shut it down.

Because accountability for alternative schools is so ill-defined, there is another consequence: failing schools that are not truly "alternative" but serve low-income or urban students, trying to claim exemption from standard accountability measures that are designed to apply to them.

---

[1] In policy circles, alternative schools are often referred to as "Alternative Education Campuses" or AECs. This report uses that term as well as variations such as "alternative public schools" interchangeably, adding "charter" to denote public charter schools that fit the designation.

How can authorizers maintain high expectations for all students and all schools, and at the same time hold alternative charters accountable for their performance, taking into account their unique circumstances and populations?

The National Association of Charter School Authorizers (NACSA) created a Working Group on Accountability for Alternative Charter Schools to review this situation. The Working Group wrestled with this fundamental question: How can authorizers maintain high expectations for all students and all schools, and at the same time hold alternative charters accountable for their performance, taking into account their unique circumstances and populations?

This paper explores that question. It examines key challenges of standards, terminology, and data; asks what level and forms of discretion are appropriate in authorizer decisions; and makes recommendations to authorizers for creating their own approaches to robust, thoughtful accountability for alternative charter schools.

This document represents part one of the Working Group's efforts: recommendations for authorizers. A second paper will take this inquiry one step further and present proposals for reform of state policy on accountability for alternative public schools.

The Current State

Accountability for alternative charters is embedded in the broader requirements of state and federal policies for public school accountability. Here is a brief review of the significant rules.

Federal Policy

Since enactment of the No Child Left Behind Act (NCLB) in 2002, schools, districts, and states (including charter schools) have been required to report standardized test results by demographic and economic subgroups in order to calculate Adequate Yearly Progress (AYP). They also have had to tabulate attendance rates for elementary and middle schools, as well as four-year high school graduation rates. Since AYP required hitting the mark on every one of these measures, and since many of these measures are troublesome for alternative schools, as will be explained below, they have tended to over-identify alternative schools as "not making AYP."

The Obama Administration introduced several additional initiatives that shape the accountability environment for alternative schools. The Race to the Top program and other programs such as School Improvement Grants require that states identify the bottom five percent of schools in terms of academic performance and take action to turn them around. Yet, if states cannot accurately depict the difference between alternative and regular public schools, the bottom five percent is too often occupied by campuses that, by design, serve highly specialized populations who have already dropped out of school or are otherwise at extreme risk of academic failure, and who don't do well on standardized tests. This obscures the effort to identify conventional public schools that are failing their students—and confuses effective alternative schools with those that truly do belong at the bottom of the ratings heap because they are failing on their own terms.

SUBGROUPS VS. RISK INDICATORS

At the outset, it's important to understand the difference between "subgroups" that comprise No Child Left Behind (NCLB) Act accountability and the inventory of challenges that characterize students in "alternative schools." NCLB intended to disclose the real educational status of underserved students previously overlooked in reports of "average" performance, and set consequences for schools and districts that failed. Therefore, minority groups, low-income students, English language learners, and students with disabilities are all included in the regular accountability systems of each state. Students who populate "alternative" schools may come from one or more of these subgroups, but a school is not an AEC because it serves some of these students, or even entire populations that are low income or minority children. Students in AECs have additional severe challenges to their likelihood of successfully finishing school (a list of those who qualify is found on page 7).

More than 40 states have received waivers from key accountability provisions of NCLB. They are replacing AYP with other kinds of accountability frameworks including multi-measure indexes that result in a letter or numeric "grade" for each school; creating "super-subgroups" that aggregate all the demographic categories into a single, larger group for accountability purposes; and redefining the ultimate accountability target from "all proficient by 2014" to more measured definitions of proficiency and growth over a longer time span.

No state has used the waiver opportunity to create a new, separate system for its alternative schools, perhaps because federal policy continues to lean strongly toward maintenance of the same long-term outcome standards for all students and schools, even while allowing multiple paths toward that goal.

State Activity

According to a 2009 report by Jobs for the Future (JFF), "Only six states have clear and separate accountability measures in place for alternative education schools and programs that recognize their achievements (or shortcomings) in improving student performance."[2] They are California, Texas, Colorado, Oklahoma, Florida, and North Carolina. JFF found that other states either acknowledged the existence of alternative schools while providing nothing different in terms of accountability measures, or simply made no distinction.

There have been new developments since publication of the JFF report, not all in a positive direction.

- Texas is adopting a new accountability system that will include Alternative Education Centers (as they are known in Texas), with modified performance targets, rather than maintaining a separate system.

- Colorado has continued developing a cogent model that limits the number of campuses labeled "alternative" but then provides a full menu of accountability options. Its capital city, Denver, has recently modified its own alternative accountability system, taking into account multiple years of performance in order to reduce the impact of single-year variations in school performance.

- In December 2012, Ohio legislators approved a new school-evaluation bill that included a separate accountability system for dropout recovery charter schools, as well as tough closure requirements for those that fail to meet the new standards in two out of the three most recent school years.

- California's Alternative Schools Accountability Model (ASAM) has fallen victim to budget problems, and implementation has suffered. In 2000, the California Department of Education offered schools serving specified at-risk students a range of accountability options from which to choose. But due to budget reductions, the state no longer collects the accountability indicators used by ASAM schools. For state accountability requirements, ASAM schools are held accountable under the state's regular Academic Performance Index and receive growth targets. But they do not receive state ranks, effectively exempting them from some state accountability requirements, such as the performance-based renewal criteria approved by the state legislature in 2003.

DATA POINTS

Everything discussed in this report relies on the collection and proper use of student-level and school-level data. The lack of sound, accessible data is a major obstacle to good accountability policy and practice. Throughout this report are **data points** that note specific knots in getting the kind of accurate, granular, and user-friendly data needed.

---

[2] Cheryl Almeida, Cecilia Le, and Adria Steinberg, with Roy Cervantes: Reinventing Alternative Education: As Assessment of Current State Policy and How to Improve It. Jobs for the Future, 2009. http://www.jff.org/sites/default/files/AltEdBrief-090810.pdf

How Do You Define an "Alternative" Charter School?

What Are the Characteristics of Alternative Charter Schools?

To be considered for any distinctive accountability treatment, an alternative charter should declare its intentions in its mission statement. While other criteria should be applied (see below), the place to begin is with an explicit statement that the school will primarily serve students with grave threats to their academic and personal success. The mission statement should be specific—for example, saying the school will serve autistic students, or incarcerated youth, or migrant students.

Of course, some schools will ultimately attract "alternative" students even though they didn't intend to. Authorizers should give these schools the opportunity to clarify their missions if circumstances evolve in this way.

Who Are the Students?

There is general agreement among the Working Group participants that an "alternative" charter school must serve a truly "alternative" population. Students who are economically disadvantaged, who enter school speaking another language, or who have disabilities typically attend regular K–12 public schools—charter and otherwise. State and authorizer accountability systems may not be perfect, but for the most part there is no need to treat these students differently in terms of school-level accountability.[3]

> There is a general agreement among the Working Group participants that an "alternative" charter school must serve a truly "alternative" population.

However, when a school's predominant population consists of students with extraordinary learning difficulties, acute risks to their ability to succeed, or documented histories of severe academic failures that leave them significantly over-age and under-credit in the high school years, a different approach is needed.

There is an area here, where the NCLB "subgroup" populations may cross over into "alternative" status. A school that serves a very high percentage of students with Individualized Education Programs (IEPs) requiring multiple hours per week of individualized learning services, and that defines its mission as serving special-education students, might well qualify as an "alternative" campus for accountability purposes. So might another school that serves a large population of students with low-incidence, high-need physical or cognitive impairments.

---

[3] The federal Adult Education and Family Literacy Act, section 203, defines *adult* education as: "Services or instruction below the postsecondary level for individuals: a) who have attained 16 years of age; b) who are not enrolled or required to be enrolled in secondary school under state law; and c) who lack sufficient mastery of basic educational skills to enable the individual to function effectively in society; do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or are unable to speak, read, or write the English language." There are striking similarities between this definition and the student population often found in alternative charter schools, and there is some programmatic crossover in that both alternative schools and adult education may offer GEDs, basic skills, English as a Second Language, and Career Technical Education programs. In part because only a few jurisdictions allow chartering of adult education schools, this report will confine itself to schools serving elementary and secondary purposes, even if ungraded and enrolling older students.

Even with respect to the categories named, some discretion and judgment is required. A school that serves parenting teens, for example, may organize the school day around childcare needs, but feature curriculum and testing that would fit within a standard accountability system. With the right supports, those students can be expected to perform well on regular tests.

How Many Does It Take?

What percentage of those populations is needed in any student body to qualify the school as "alternative?"

States define the threshold in various ways—or not at all. Colorado requires that a school's population have 95 percent of students in high-risk groups before it moves into the alternative accountability system. Texas (until recently) set the bar at 75 percent. Washington, D.C.'s Public Charter School Board (DC PCSB) is reviewing a proposal to set the level at 60 percent. And some states have no threshold, permitting schools to join "alternative" systems—or simply be omitted from conventional accountability—if their stated mission is to serve an alternative population.

Another approach could be called a "gap" model, where a state would look across all schools and then see if there's a clear demarcation between "regular" schools that have some percentage of at-risk students, and "alternative" schools whose population is primarily the latter. This is how the DC PCSB identified its proposed 60 percent threshold.

A third way to look at alternative schools is simply as schools with students who have failed, for whatever reason, in traditional schools. They could be defined as students who are over-age for the credits they've amassed. Texas Senate Bill 2, signed into law in June 2013, says that schools with more than 50 percent of students age 17 or older could be classified as dropout-recovery schools.

Among the categories that would qualify a student population as "alternative" are the following:

» Students identified as dropouts

» Persistently truant and absent students

» Adjudicated youth

» Pregnant or parenting teens

» High school students two or more years behind on credits

» Students with chronic behavioral problems (expelled/multi-suspended)

» Substance abusers (medically or legally documented—not casual users)

» Students with histories of homelessness, abuse, and/or neglect

» Migrants (e.g., those whose families move for work)

» Refugees

» Recently arrived immigrants, especially if deficient in home language skills

» Highly mobile students

» Students with emotional or psychological disorders

» Students with extraordinary skills deficiencies

» Children of substance abusers and/or incarcerated parents

» Children of teen parents

GIVING ALL SCHOOLS CREDIT WHERE DUE

The Working Group was convened to develop recommendations on how authorizers should hold accountable a small subset of charter schools: those whose enrollment is almost exclusively composed of students fitting the criteria listed above and for whom the conventional approach to accountability becomes such a poor fit that a wholly separate system is called for. But what about public schools that enroll small to moderate numbers of students who are at exceptionally high risk of academic failure?

Although they won't qualify as "alternative" schools, and therefore will not have a separate accountability system, it's important that authorizers know how well these schools serve "high-risk" students. All schools that educate high-risk populations should have the ability to describe their performance in multi-dimensional ways—and should get credit for surmounting the hurdles those high-risk students present. Schools should be able to define the proportion of high-risk students they serve and describe the progress they have made, while also showing how the high-risk students' outcomes impact the school's overall performance and growth. Authorizers can use this information to make informed decisions but should keep in mind that a school serving 80 or 90 percent high-risk students will likely see markedly different results from schools serving 20 or 30 percent high-risk students.

Some locales use a combination of methods. California has at least two different ways of identifying alternative populations. One requires that at least 70 percent of students fall into at least one of seven at-risk categories. The other defines dropout-recovery schools as those whose population consists of at least 50 percent dropouts or students who have "transferred" but not reenrolled in another school for 180 days.

Measuring the Performance of Alternative Schools

Evaluating the performance of alternative schools requires a wider range of instruments and measures than are commonly used today for traditional public schools. Familiar measures of academic proficiency and progress must be taken into account, but may merit different responses and consequences than those for other schools. Additional quantitative and qualitative measures should be added into the mix. In the financial and operational areas, the standard evaluation templates may need some tweaks.

Academics: It's not the easiest time to be devising measures and metrics for the academic performance of any school, given that most states have embraced the Common Core State Standards (CCSS) and are scurrying to prepare for the related assessments. The new standards are richer and deeper than most prior state standards. Tests will require more reasoning and analysis. For students, parents, and educators this will be a difficult transition; expectations must be carefully managed since in the initial administration of the new tests, proficiency scores are likely to fall.

For alternative schools, this transition needs particular care and attention. By providing it, authorizers of alternative charter schools have an opportunity to demonstrate that rigor and higher expectations can go hand in hand with evaluation approaches that are fine tuned and sensitive to school context.

Operational and financial indicators: Alternative schools may have distinctive characteristics that merit different approaches in monitoring their operational and fiscal houses. But the Working Group did not recommend that authorizers adopt any fundamental changes in the structure of oversight for alternative schools, rather suggesting a number of refinements to existing mechanisms. Its view is that a strong application document, for example, should always ask which population is to be served, the school's location, and the resources needed. The authorizer should scrutinize the answers to see that it comports with the school's mission. Similarly, every charter school is expected to have a board that works hard, is free of conflict, and fulfills its fiduciary responsibilities. The personnel may be different on the board of an alternative charter but their job is essentially the same. *(See page XX for some recommended adaptations of authorizer practice in these areas.)*

DATA POINT

In evaluating the performance of alternative schools, a central question is "compared to what?" When we look at the performance of a given alternative school, we should be able to see it in several dimensions:

• How well do students perform on absolute measures of proficiency, as well as measures of growth, and how do they change over time?

• How well does the school do compared to schools with similar populations?

• How well do students perform compared to similar students in traditional schools?

Right now, we can answer these questions with certainty in only a few states.
In the following section, we begin by examining how authorizers can create a set of academic measurements that the public and policymakers can trust.

Standardized Assessments

Charter schools are held accountable through the same state assessments as traditional public schools. In the age of No Child Left Behind (NCLB), and even in states operating under NCLB waivers, federal rules require that all public schools take these tests. Their results become part of the calculation of whether the school and district make Adequate Yearly Progress (AYP).

Alternative schools are not exempt from these requirements. The great majority of alternative schools administer these tests, and this is a good and useful thing. Even if a student is over-age and far below his peers in reading or math proficiency, the school and those who hold it accountable need to know that. But the interpretation of outcomes, and consequences attached, should take the school population into account. No school serving over-age, under-credit youth should be deemed a success or failure simply because of proficiency scores on the state test.

There was strong consensus in the Working Group that schools should be judged by a variety of assessment instruments beyond the state test, including other standardized assessments and a range of measures reflecting the school's mission.

How, then, should authorizers interpret results on mandatory state assessments? Assuming that states continue to follow the NCLB testing pattern (reading and math and/or science; annually in grades 3–8 and once in high school, usually at grade 10 and perhaps repeating in higher grades), the following are some of the pressing questions and options:

1. Proficiency

The most familiar way of evaluating public school performance is by determining what percentage of students attains a set level of proficiency on state exams. Different states use different tests and define proficiency in different ways and with varying levels of rigor, but the idea is the same: Are students learning enough to get a passing grade on a criterion-referenced test administered once a year in the spring?

In recent years, each state has ratcheted up the proficiency bar every few years, reflecting NCLB's expectation of 100 percent proficiency by 2014. States that have received NCLB waivers have been allowed to stretch out the time allotted, and/or have established different interim targets for various subgroups depending on where they started. But proficiency remains the cornerstone of most state accountability systems, and the benchmark most familiar to the public.

Should states (and/or authorizers) set different proficiency levels when judging the performance of alternative public schools? NCLB doesn't address this question (and neither have state waivers) because doing so would suggest a lower set of expectations—an unacceptable premise when the objective is to "leave no child behind." Yet making no accommodation for alternative schools has often had the practical effect of no accountability at all. Rather than set unrealistic expectations, many states have simply left alternative schools out of the accountability system altogether.

For alternative schools to rejoin the accountability rolls requires that something be done with the results of proficiency tests. Texas and Arizona have taken contrasting approaches—the former setting different cut scores for alternative schools, and the latter creating a wholly separate scale in which alternative-education campuses are compared against each other.

Figure 1 illustrates the two approaches.

FIGURE 1: Texas and Arizona: Two Paths to Evaluating Alternative Schools

Texas Education Agency (TEA) 2013 Transition Year Accountability Targets

In its new state-accountability program, the TEA considers four main indicators: Proficiency, Growth, Closing Achievement Gaps, and Readiness. This table illustrates how the TEA is adapting its 2013 performance ratings for schools evaluated under its current Alternative Education Accountability (AEA) system, setting targets lower than those for conventional public schools.

To receive a *Met Standard* rating or a *Met Alternative Standard* rating, schools and districts must meet the following accountability targets on all indexes for which they have performance data in 2013. Indexes for each indicator are comprised of several elements (such as test scores and graduation rates) that are weighted in importance to produce the final target.[4]

Indicators	Targets for Non-AEA Districts and Campuses	Targets for AEA Districts and Campuses
Index 1: Student Achievement	50	25
Index 2: Student Progress	Campuses High Schools: 17 Middle Schools: 29 Elementary Schools: 30 Districts: 21	9
Index 3: Closing Performance Gaps	55	30
Index 4: Postsecondary Readiness	75	45

For alternative schools in the AEA system, additional elements are considered in the Postsecondary Readiness Index. For the other three indicators, all schools and districts are subject to the same index elements.

Arizona State Charter School Board's Performance Framework

A second way of evaluating proficiency is to compare AECs only to each other and to determine whether they rank in the higher or lower tiers of performance. This is an example from the new performance framework for the Arizona State Board for Charter Schools.

Exceed Standard:
- School's proficiency rates are in the top 10 percent of statewide alternative-school performance.

Meets Standard:
- School's proficiency rates meet or exceed average statewide alternative-school performance but fall below the top 10 percent.

Does Not Meet Standard:
- School's proficiency rates fall below average statewide alternative-school performance but are above the bottom 20 percent.

Falls Far Below Standard:
- School's proficiency rates are in the bottom 20 percent of statewide alternative-school performance.

---

[4] *Overview of 2013 State Accountability*: Shannon Housson, Director, Office of Assessment and Accountability, Division of Performance Reporting, Texas Education Agency. PowerPoint, August 8, 2013.

Actually, both methods depend on an understanding of how well alternative schools are doing on proficiency tests statewide. Texas uses that information to create a "discount" from the standard schools' scoring average; Arizona nests the alternative schools directly in their own scoring range. The advantage of such methods is that they provide more-equitable treatment for alternative schools; the disadvantage is that both cases assume that students in those schools will not do as well as their peers.

A recent Education Week series provided a look at how one admired charter operator sets a realistic proficiency goal as one among many measures of internal accountability. At Chicago's Youth Connection charter network, whose population averages 18 years old, three-quarters of the network's students entering in the 2012–13 school year were reading at a 6th grade level or below. While the network has an exemplary record of awarding diplomas (to the extent that Chicago's superintendent credits it with reducing the citywide dropout rate by 7 percent), the network's achievement goal is to boost students' literacy levels to at least the 10th grade.

DATA POINT: TIMING AND TESTING

One of the most pervasive problems in evaluating alternative schools is that assessment data is assembled by grade levels. Yet many students in alternative settings—and in traditional schools—may be considerably older than the standard age for their grades, and typically school districts and states do not take into account the ages of students sitting in a particular grade's classrooms. This information may be crucial to understanding whether a student is making learning gains or not.

For example, a student who begins 6th grade not knowing how to multiply or divide (which are typically 4th grade skills) may be able to learn these operations in 6th grade; but that student will take a state assessment measuring 6th grade skills such as graphing a line or multiplying fractions. The student will "fail" the grade-level test despite making multiple years of growth. (This is why alternative schools often choose to be measured by norm-referenced exams that measure all standards across multiple grade levels.)

A comparable problem happens in high school. Educators stress "college and career readiness" as a principle goal of secondary schools. But when states administer their final assessments in 10th grade, they're measuring students too early to gauge their real readiness for postsecondary work (especially if reading and math are the only topics covered). More direct measures include dual-enrollment credit, Career and Technical Education (CTE) certification, and other achievement outcomes.

2. Growth

Charter advocates have long fought for the inclusion of growth measures in state and federal accountability schemes, since so many students arrive at the charter school door months or years behind grade level in academic achievement. Collecting student-level data over time and aggregating it to portray school-wide performance is the best way to demonstrate the impact of schools—rather than the advantages or disadvantages of income, upbringing, and prior schooling.

Nowhere is this more important than in alternative schools, where students may be seriously deficient in academic credits and are likely to score at the low end of proficiency on grade-level tests. A growth measure is critical—but also comes with caveats.

It may be difficult to obtain longitudinal data on students who have been out of school for prolonged periods and have missed tests. That's why it is doubly important for schools to administer "short-cycle" assessments that can look at student learning at the beginning and end of a given school year and perhaps several times mid-year. These tests are marketed by numerous vendors (Scantron, Renaissance Learning, Northwest Evaluation Association [NWEA's MAP], Discovery) and can provide educators and authorizers evidence that growth is either happening or not, expressed in more granular terms than usual (for example, "months of learning gained").

> The growth trajectories of students in alternative settings may look different from those in conventional settings.

SIATech, the School for Integrated Academics and Technologies—a network of public charter high schools with campuses nationwide—has developed its own value-added model using the Renaissance Learning reading and math tests. SIATech serves reengaged dropouts whose population is typically far below grade level and outside of the age range of standardized tests provided by the states. Its model includes assessment upon enrollment followed by multiple short-cycle testing periods. Each student is measured at an individual level, an "expected learning gain" is calculated, and school sites are measured to determine the proportion of students who meet or exceed expected gains. Success is measured by the proportion of students at each site who achieve at or above the expected learning gain. Data and an annual summary are provided to each respective charter authorizer.

The growth trajectories of students in alternative settings may look different from those in conventional settings. Working Group member Jody Ernst (formerly of the Colorado League of Charter Schools) compared AEC performance in seven states to the norming documents for the NWEA "MAP" test, commonly used by charters and other public schools to establish growth against a national norm group. The review found that AEC students grew at significantly lower rates than those expected for the national pool—suggesting that standard growth targets may not suffice for AEC students.[5]

---

[5] Dr. Ernst (jernst@momentum-sr.org) has also investigated how to create more appropriate growth measures, either by providing "norms" for growth based on a large sample of AEC students, or by using AEC students' incoming grade equivalent scores to set growth goals based on the NWEA norming tables. The latter is described in a paper written with her former Colorado League colleague Jennifer Turnbull (jturnbull@momentum-sr.org). Please contact the authors directly for further information.

Testing Issues

Many alternative schools simply are not held accountable for performance—at all—because the number of students taking standardized tests does not create sufficient "n" to matter for accountability purposes. In these instances, state waivers are helping to bring some alternative schools back under the accountability tent. By merging small numbers of test-takers into "super subgroups" and reporting the results as (for example) a single "at-risk" group, the waiver plans may increase the number of alternative schools subject to state accountability.

Also underway is a change in how test results are used in accountability schemes generally. Under the original structure for AYP, a school needed to surmount a given year's proficiency threshold in up to 36 separate categories, many based on tests. Missing the bar in any one category meant not making AYP and being subject to sanctions. States that are now using an "index" approach look at entire sets of indicators that typically include growth. For schools whose students have a poor history of test performance, this reduces the crippling impact of a single adverse test "snapshot."

When schools serve a highly mobile student body whose arrival and departure is not in synch with typical testing calendars, or who build toward graduation through mastery of discrete units, the conventional late-spring schedule for state testing may make it difficult to ascertain how well the school is doing. The authorizer and school need to agree on how the sequence of student learning will be measured. Then the bottom line is "What percentage of students attain the targets set in their own plan?" The authorizer would expect to see this number rise over time.

A SNAPSHOT OF COMPETENCY EDUCATION STATE POLICY ACROSS THE UNITED STATES

Advanced States
Those states with clear policies that are moving towards proficiency-based; more than just an option.

Developing States
Those states with pilots of competency education, credit flexibility policies, or advanced next gen policies for equivalents to seat-time.

Emerging States
Those states with waivers, task forces.

ILN States
Since its inception, the Innovation Lab Network (ILN) engaged schools, districts, and state education agencies working to identify through local efforts new designs for public education that empower each student to thrive as a productive learner, worker, and citizen. The state's responsibility is to establish conditions in which innovation can flourish and to develop capacity to sustain and scale what works through policy. The Council of Chief State School Officers (CCSSO) facilitates this network of states to support programmatic, policy, and structure design work within each participating states and across the network.

No Policies in Competency Education
States with seat-time and no competency education policies.

There are other opportunities to overcome the mismatch between alternative schools and standard tests. Consider the student who arrives at school at age 17 but is reading at a 3rd grade level. Handing that student a standard 3rd grade reading test, with its vocabulary and social assumptions, is not likely to produce a useful result. For that reason, schools should use computer-adaptive tests that find an appropriate level of difficulty and context for each student.

As states move toward the CCSS curriculum, the two national testing consortia (Partnership for Assessment of Readiness for College and Careers [PARCC] and Smarter Balanced Assessment Consortium [SBAC]) are both planning on computer-based testing that will emphasize deeper probing of content knowledge and more sophisticated problem-solving. But only SBACs planning (at this point) to use adaptive tests that calibrate questions to the student's starting point. Authorizers and schools in PARCC states should be asking how that consortium plans to deal with students who are over-age for their knowledge and skill levels.

THE PROBLEM OF "N" SIZE

Many alternative campuses escape any kind of accountability because of their small student population. Under No Child Left Behind and state accountability systems, each school and each "subgroup" (low-income, English Language Learners [ELLs], etc.) must have enough members to meet a certain threshold for accountability purposes. So, a school with 45 students might not get counted, nor would a special-education subgroup of 19. In Massachusetts, only six of the state's 30 alternative public schools received a rating in the state accountability system in 2012 due to the "n" factor. This underscores the importance of using multiple measures to determine how schools are performing.

Other standard measures

In addition to test-based measures, all public schools—alternative schools included—are required to report graduation, attendance, and dropout rates. But some of these "persistence" measures are among the most troublesome for schools that must think outside the box.

1. Graduation

There is strong agreement in the Working Group that the standard, four-year cohort-based graduation rate is a major roadblock to useful accountability for alternative schools.

It should be acknowledged that this measure is a step forward from the haphazard way that states have accounted for graduation in the past, where a 95 percent rate might really mean "95 percent of those who started senior year in September graduated the following June." In 2008, the United States Department of Education published regulations, to be fully implemented by the 2011–12 school year, requiring states to use the four-year adjusted rate method devised by the National Governors Association. Now, schools and districts properly count from 9th grade on and expect high schools to graduate most of

their students on a four-year timetable. As we look at the special circumstances of alternative schools, this progress in measuring conventional graduation rates should not be lost.

The 2008 regulations allowed states to calculate graduation rates over longer periods but required states to use higher annual rates in exchange for the longer terms; for example, if a state used a five-year cohort instead of the usual four years, it would require annual increases of three percent in the overall rate rather than two percent. Under the waivers provided by the Obama Administration, that quid pro quo has been eliminated; states are required to take action on any school whose graduation rate is lower than 60 percent, whatever the length of time allowed for graduation.

"Learning is the constant, time is the variable."

Cliff Chuang (Massachusetts Department of Elementary and Secondary Education)

But for schools specifically designed for students who haven't marched from one grade to the next, the standard rate doesn't capture what schools accomplish: re-engaging students whose connection to schooling is tenuous and supporting them for what might be many years until they succeed and graduate. Consider, for example, what kind of perseverance it takes for a student to decide to stay in school for a 5th or 6th year after most of her friends have graduated. Schools that succeed in retaining such students should be rewarded, not penalized.

Most states currently lack even a terminology for students who don't graduate "on time." Texas now refers to them as "continuers" if they move through a 5th or 6th year before graduating; as long as they remain enrolled and attending school, their non-graduation is not held against the school for accountability purposes.

In a variety of ways, the traditional graduation definition can be a straitjacket for alternative schools:

- Some students go straight from 8th grade into 9th and begin their high school careers, but they make slower progress due to learning issues or life circumstances.

- Some students who have been out of school altogether for two or three years begin school as chronological 11th graders but with 5th grade skills.

- Some students are in and out of school because their families move often; the parents may be sharecroppers or one step ahead of the landlord, but it means the students simply won't be in any one place for long.

So the guiding rule should be "Learning is the constant, and time is the variable," as Working Group member Cliff Chuang (Massachusetts Department of Elementary and Secondary Education) put it. Perhaps all schools should be able to offer a longer path toward graduation, but this allowance is essential for alternative schools.

Some groups worry that allowing a longer graduation cohort for conventional schools will dilute accountability. But they can see the logic of using extended graduate-rate cohorts for schools that serve students with extraordinary academic challenges. The Alliance for Excellent Education, in a report critical of waiver policies, said, "Students deserve every opportunity to succeed, and an extended-year graduation rate provides schools with an accountability incentive to support struggling students who need more than four years to complete high school. Alternative schools serving young people who have already

dropped out of high school or who are severely over-age and under-credited may be best served through a different accountability system that uses additional and distinct measures."[6]

Ten states have won waivers to use extended-year graduation rates of five or more years. In the case of Ohio's new evaluation system, an eight-year cohort will take effect in 2015.

When should the clock start?

Although policymakers debate how long to extend the timetable for graduation rates, they tend to overlook the starting point. Alternative schools often see students who show up and perhaps sign up, but then move on without ever really attending school. Given the loose attachment of some students to any educational process, some states allow a kind of "grace period" before a given student is attached to a school's rolls for accountability purposes. For Arizona's 93 alternative charter schools, the state counts students as continuously enrolled for a Full Academic Year (FAY) as of October 1 each year, rather than after the first 10 days.

This is one area where the contractual role of authorizers can make up for shortcomings in state policy. Authorizers should have the ability to work out suitable methods for evaluating a school's performance at moving students toward graduation—and then holding them to it at renewal time. States should ensure that this judgment is left to authorizers overseeing alternative schools.

---

[6] Alliance for Excellent Education: *The Effect of ESEA Waiver Plans on High School Graduation Accountability*. Washington, D.C., February 2013. http://www.all4ed.org/files/ESEAWaivers.pdf

[7] Claudio Sanchez: "In Today's Economy, How Far Can a GED Take You?" NPR, February 18, 2012. http://www.npr.org/2012/02/18/147015513/in-todays-economy-how-far-can-a-ged-take-you

[8] James J. Heckman, John Eric Humphries, and Nicholas S. Mader: "The GED." NBER Working Paper No. 16064. Issued in June 2010. http://www.nber.org/papers/w16064.

[9] For background on the proposal see http://www.cde.ca.gov/ta/ac/ap/documents/regionalmeetings.pdf.

Is a GED Truly Equivalent to a Diploma?

Although many alternative schools offer a General Education Development (GED) certificate, there is clear evidence that a traditional diploma has more value in the marketplace. Although the GED was developed by the military during World War II to give veterans lacking diplomas a better shot at jobs, even the military (with some exceptions) has stopped enlisting GED-bearing recruits. According to Russell Rumberger of UC Santa Barbara: "If you look at employer surveys, the things that employers generally think are important, especially at lower-end jobs, are qualities like perseverance and tenacity, which are not measured by the GED."[7]

An influential study conducted by Nobel Prize-winning economist James Heckman and colleagues found "minimal value of the certificate in terms of labor market outcomes" and that it rarely leads to postsecondary credentials. They also found that "through its availability and low cost, the GED also induces some students to drop out of school."[8]

States are taking note and adjusting their own valuation of the GED. Recent California legislation (Senate Bill 1458) has mandated that the California Department of Education incorporate graduation rates into the state accountability metric, called the Academic Performance Index (API). While a specific formula has not yet been officially adopted, one proposed formula would provide less credit for a GED than a diploma: a student with a GED would contribute 800 points toward their school's API, compared to 1,000 points for a diploma and 200 points for a non-graduate).[9]

2. Dropouts

Since many alternative charters are in fact "dropout recovery" schools, they are expected to retain students once they've welcomed them back inside the schoolhouse. For accountability purposes, the real challenge is getting credit for re-engaging those students in the first place.

Because graduation rates are typically limited to a narrow period of years, students who have been out of their 9th grade cohort for more than a year or two are not reflected in the graduation rate of a dropout recovery school. This makes little sense, especially given how badly the odds are stacked against the student who drops out. A study by the education research lab WestEd found that although nearly one-third of dropouts try going back to school, fewer than one in five eventually make it to graduation.[10]

One solution is to make sure that schools—all schools—get credit for re-engaging students who have dropped out. A "re-engagement rate" could represent the percentage of students in any graduation cohort who had previously dropped out (or were chronic truants). It could include all students who reenroll and earn a diploma regardless of their time out of the 9th grade cohort. Under current federal guidance, none of these students count in the graduation rates. And the students who remain reenrolled after "aging out" of their 9th grade cohort count against the school.

In any case, it's important to consider a given school's dropout rate from several angles:

- What did the school promise? Its contract should state the goal and also say how the rate should be measured.

- What's the right comparison? A community's overall dropout rate may be very low (even if calculated honestly). But students who have already dropped out once have increased difficultly in staying in school—so the goal of a dropout recovery school should represent ambitious but realistic improvement expectations for that group, not the general student population.

- Depending on their models, most schools will also pay attention to the year-over-year retention rate as a significant indicator of affiliation and satisfaction with the program.

DATA POINT: WHO IS A "DROPOUT?"

Working Group members who operate alternative schools in several jurisdictions noted that students who have in fact dropped out of their previous schools are often labeled "transfers." When they arrive at the alternative school, that school becomes solely responsible for their continued attendance, while the prior school gets no discredit for having lost them.

There is a simple matter of perverse incentives at work here. No public school wants to be known as a dropout factory, and given the inadequacies of district and state record keeping, it's an easy matter to code a student's departure in the most benign terms.

---

[10] Sarah D. Sparks: "Many Dropouts Try—and Fail—to Return to School." *Education Week,* June 6, 2013. http://spf.dpsk12.org/spf_alt.html

3. Attendance

Even this most mundane accountability measure may take on a different hue for students in alternative schools (and for "alternative" students in regular schools), in at least two ways:

First, for students who have had a spotty attendance history, it's good to know how they compare to the average student and what they contribute to the school's overall rate. But the most meaningful comparison is how their attendance at the new site compares to their attendance at their former school. Averaged across all students, this serves as a key measure of school-wide gains in student engagement.

Second, in schools that aim for competence or mastery rather than seat time, daily attendance may need to be reconsidered as "learning time." At Boston Day and Evening Academy in Roxbury, Massachusetts, the school offers distance learning opportunities for students who are unable to be physically present on a given day. Just as in any remote-learning situation, students are certainly "attending" though not in the building.

And taking the point further: How should authorizers think about attendance when what matters is whether students actually master the material, no matter where they are or how much actual time they spend? Authorizers willing to challenge orthodoxy might want to rethink this entire issue.

4. College and Career Readiness

Ideally, a diploma should confirm that the student is ready for the next step in life, whether it is a two- or four-year college, the military, or employment. But there are more direct ways of certifying readiness and many states, schools, and authorizers are looking to develop these specific indicators. Among them are the following:

> » **College readiness:** The Scholastic Aptitude Test (SAT) and American College Test (ACT) are the most common measures of readiness for college. Authorizers should be looking at both the scores and the percentage of students taking the tests. ACCUPLACER Diagnostics, a suite of adaptive tests developed by Pearson and the College Board, is used by higher education institutions, including a number of community colleges, to determine whether entering students are ready for college-level work.

> » Some schools use **preparation of Grant and Scholarship Applications**, including the Free Application for Federal Student Aid (FAFSA), as an indicator of intent, and authorizers might consider a school's record of getting eligible students to pursue needed financing. But since it is not a direct measure of readiness, it should be weighted less than other measures.

> » California has **coursework completion requirements**, known as the A-G standards, for access to its own state universities. The state also looks at results from a statewide test used to measure readiness for college-level English and math, called the Early Assessment Program.

> » **Career readiness:** A variety of career readiness metrics are available for assessing student and school success. Among those reviewed by the Working Group were attainment of an industry certification, scores on WorkKeys (a workplace-skills assessment developed for employers by ACT), and employer-developed surveys that measure workforce readiness.

LONG-TERM RESULTS

The most important measure of readiness is also the hardest to collect: Do graduates succeed in the next phases of their lives? If they attend college, are they able to take regular course loads without remediation? If they join the military or enter employment, do they have the skills, knowledge, and persistence to stay engaged and productive?

It's a challenge for any high school to gather this data; for alternative schools is it doubly difficult due to the mobility of their students. Even during school years, many of these students have loose connections to school and other institutions; once they're fully on their own, it's difficult for a school to follow their paths over a period of years.

The National Student Clearinghouse maintains a database of postsecondary progress, but it operates on contracts with school districts. Charter schools may have to contract directly with the Clearinghouse to obtain its services; their authorizers should look into doing this for their entire portfolios.

What Else Can Be Measured?

Beyond what's required by the state, authorizers have an opportunity to look at alternative charter school performance in ways that fit the circumstances of the students and schools. Authorizers who create very mission-specific contracts (or "accountability plans") may want to include several of the following measures in each charter. Authorizers that use a more standardized template for evaluating performance should still consider one or more of these measures as an indication that the school is fulfilling the mission for which is has been chartered:

- For students who have been incarcerated: Are they out of the justice system? Over an entire school, over time, does the recidivism rate decline? For students in treatment programs: Do they successfully complete the program and remain free of drugs?

- Do graduates get stable jobs and remain employed for a reasonable period of time?

- Family engagement: Do students reconnect with parents? If they are parents themselves, do they fulfill their responsibilities, such as enrolling their children in preschool?

- Surveys: There are several well-known surveys that measure students' expectations, attitudes, and feelings of autonomy. One is the HOPE survey developed by EdVisions Schools, which measures student motivation; another is the Gallup Student Poll, which measured a half-million students in 2012, including reengaged dropouts. The poll measures hope, engagement, and well-being because, as Gallup says, "Our research shows these metrics account for one-third of the variance of student success…Hope, for example, is a better predictor of student success than SAT scores, ACT scores, or grade point average."[11]

- Personal growth: Do students seize opportunities to give back to the community through activities such as voter registration and working on community service projects?

- Involvement in creative programs: Do students participate in any programs that can serve as an indicator of building employability skills? For example, the High School for Recording Arts in St. Paul, Minnesota, created a visual design program with a local nonprofit, Sweat Equity Enterprises; there was a marked increase in credits taken for students participating in the program.

---

[11] Brandon Busteed, Executive Director of Gallup Education: "The School Cliff: Student Engagement Drops with Every Year." The Gallup Blog, January 7, 2013. http://thegallupblog.gallup.com/2013/01/the-school-cliff-student-engagement.html

- Community improvement: Does the school have a positive impact on the crime rate around the campus itself? Do local shops and businesses have a welcoming attitude about the school and its students?

- Metacognitive skills: These skills involve monitoring learning and making changes in either how or what one studies. In a sense, it's the management of one's own learning—a critical set of skills in the knowledge economy of our times, and one that especially needs cultivation in students who have fallen far behind in school. These skills can now be identified and measured, and growth in these areas can be considered a strong building block for outcome accountability.

- "Grit": Boosted by Paul Tough's book *How Children Succeed*, this term is gaining popularity as an expression of important non-cognitive traits (such as perseverance, resilience, and determination) that are critical to success in college and later life. There is actually a Grit Scale, developed by psychologist Martin Seligman, which consists of 12 brief statements such as "Setbacks don't discourage me" and "I am a hard worker." (Tough says it is "remarkably predictive of success."[12])

It's important to bear in mind that in this grab bag of measurements, few can be used in valid and reliable ways across groups of students or schools. That's why we have carefully designed standard measures. But they can certainly be used to evaluate progress within schools. Treated with care, they can also help explain what standardized measures cannot, and can provide authorizers a window into the performance of schools when standard measures don't tell their stories adequately.

FERPA

The Family Educational Rights and Privacy Act (FERPA) was enacted in 1974 with the commendable aim of protecting students and families from unwarranted dissemination of educational records. Except for categories of data that schools can share with appropriate parties (e.g., sending test records to state officials), it gives parents authority over the release of records, a right that transfers to students when they reach age 18. For all its benefits, FERPA has complicated the job of serving some categories of students because it makes interagency transfer of records more cumbersome. An alternative school may not be able to get school records on a previously incarcerated youth because juvenile justice authorities hold all records; it may be difficult to establish the academic record for a highly mobile student whose prior records are held by several communities or states.

---

[12] Paul Tough: *How Children Succeed*. New York, Houghton Mifflin Harcourt, 2012, p. 75.

The Importance of Prevention

So far we have discussed ways to hold schools accountable for students at risk. Most of the schools in question deal with students of high school age or older. But public schools can do better at spotting the conditions that lead to disaffection and dropping out, and dealing with them before the student chooses that path.

A 2007 study by the Parthenon consulting firm for Boston Public Schools (BPS) found "four key risk factors that allow nearly three-quarters of likely dropouts to be identified no later than the end of the first year of high school":

- Students with one or more "risk factors" in 8th grade: attendance rates below 80 percent; two or more years over-age relative to grade level; and/or multiple 8th grade core course failures

- First-time 9th graders who fail one or more of the following core courses: English, math, science, history

- Students intending to receive a regular high school diploma who have a "substantially separate" special-education designation at any point in grades 9–12

- ELL students who enter BPS for the first time during high school[13]

As the firm put it in a separate report on New York schools: "The dropout population is the overage and under-credited population, just at different points in time."[14]

These findings indicate accountability measures that should be closely watched in both high school and elementary schools. Some states are creating programs to take action when warning signs arise.

Wisconsin recently enacted an "early warning system" designed to identify middle school students at risk of dropping out of high school.[15] It concentrates on attendance, discipline, state test scores, and whether a student switched schools. One striking finding: While school principals thought they knew which students were at risk, the study demonstrated that most principals often missed warning signs about female students.

Maryland's Montgomery County Public Schools are now looking for warning signs as early as the second semester of 1st grade, by comparing grades, attendance, and behavior of dropouts with those of graduates.[16] The system develops a risk profile at four transition points: spring of 1st grade and fall of 3rd, 6th, and 9th grades. It has found, for example, that students who missed as few as nine days of school in early grades were nearly twice as likely to drop out later.

---

[13] The Parthenon Group: Strategic Planning to Serve Off-Track Youth. Boston Public Schools, September 2007. http://www.bostonpublicschools.org/files/Parthenon%20Report.pdf

[14] http://schools.nyc.gov/NR/rdonlyres/B5EC6D1C-F88A-4610-8F0F-A14D63420115/0/FindingsofOMPG.pdf

[15] Jill Barshay: "Principals likely to overlook girls who are at risk for dropping out of school." Education by the Numbers blog (Hechinger Report), July 19, 2013. http://educationbythenumbers.org/content/principals-likely-to-overlook-girls-who-are-at-risk-for-dropping-out-of-school_375/

[16] Sarah D. Sparks: "Dropout Indicators Found for 1st Graders." Education Week, July 29, 2013. http://www.edweek.org/ew/articles/2013/07/29/37firstgrade.h32.html?tkn=YRXFxf2U7fneiqZz7tQQsojrJgXCEYZRzZxk&cmp=ENL-EU-NEWS1

What Authorizers Can Do

It's up to states, not individual authorizers, to set the basic parameters of accountability for all schools. A strong state-accountability system, including provisions for alternative schools, gives authorizers the tools they need to make well-grounded, high-stakes decisions. In states without such systems, authorizers may be flying blind at renewal time, lacking the data needed to make the case for continuation or closure. Worse, they may become embroiled in political arguments with operators of weak schools, who can produce glowing anecdotes to burnish a record of failure.

Both states and authorizers should make a distinction between the collection of data and its use for accountability purposes. All public schools have to report proficiency data, so alternative schools must report the average reading proficiency of their students. Knowing that a group of teens is reading at a 3rd grade level is important, if disquieting; knowing what to do about it is what distinguishes a solid school from a feeble one. Authorizers must be keenly attuned to this difference.

Colorado's system provides plenty of standard information but also frames additional, distinctive data for alternative schools. As a recent report by Colorado's Donnell-Kay Foundation described: "All AECs receive data on the traditional School Performance Framework (SPF), but accountability is based on a separate AEC [framework], using three of the same performance indicators and one that is modified. Improvement planning, expectations, and consequences are the same as for traditional schools, but there are different weights than for traditional schools. Within indicators, the AECs use many of the same measures and metrics but different cut-points. Districts may opt to submit supplemental measures for CDE's review."[17] In Colorado's case, the SEA partnered with the Alternative Education Campus (AEC) community and the Colorado League of Charter Schools to develop the AEC performance framework. This ensured that the state could learn from its schools and build ownership among AECs.

Two basic principles should undergird authorizers' work in this area:

1. The charter contract is the central instrument of accountability. When alternative measures are used, they must be written into the contract in clear, unambiguous, measurable terms, agreed to by both the school and authorizer. The school should understand what data must be collected and reported, whether on an annual basis or more frequently. The contract should provide several ways of looking at school performance, and should state with precision the relative weights accorded each, and the degree of success necessary for the school to win renewal of its charter. The contract should also clearly define the role and expectations for any partnership organizations.

2. Additional evaluation measures do not replace traditional standard measures, but supplement the picture with qualitative and mission-specific data. This is both a nod to reality and a step toward maintaining for all students the standards and expectations embodied in the state's accountability system.

[17] http://www.cde.state.co.us/Accountability/StateAccountabilityAECs.asp

An Example of Denver Public Schools' Alternative School Performance Framework

	Earned Points	Possible Points	% of Points Earned	Stoplight
1. Student Progress Over Time—Growth	**14**	**36**	**39%**	**Approaching**
1.1a Median Growth Percentile Reading	2	6		Approaching
1.1b Median Growth Percentle Math	4	6		Meets
1.1c Median Growth Percentile Writing	2	6		Approaching
1.2a MAP Growth Reading	2	6		Approaching
1.2b MAP Growth Mathematics	2	6		Approaching
1.2c MAP Growth Language Usage	2	6		Approaching
2. Student Achievement Level—Status	**0**	**12**	**0%**	**Does Not Meet**
2.1a CSAP Proficient+ Reading Middle School		0		
2.1b CSAP Proficient+ Math Middle School		0		
2.1c CSAP Proficient+ Writing Middle School		0		
2.1d CSAP Proficient+ Science Middle School		0		
2.1e CSAP Proficient+ Reading High School	0	3		Does Not Meet
2.1f CSAP Proficient+ Math High School	0	3		Does Not Meet
2.1g CSAP Proficient+ Writing High School	0	3		Does Not Meet
2.1h CSAP Proficient+ Science High School	0	3		Does Not Meet
3. Post-Secondary Readiness	**4**	**24**	**17%**	**Does Not Meet**
3.1a COACT Reading	0	3		Does Not Meet
3.1b COACT Math	1	3		Approaching
3.1c COACT English	0	3		Does Not Meet
3.1d COACT Science	1	3		Approaching
3.2 Best of 4/5/6/7 Completion Rate Status	1	3		Approaching
** 4 Year Completion Rate: 18.8%				
** 5 Year Completion Rate: 62.5%				
** 6 Year Completion Rate: 40.0%				
** 7 Year Completion Rate: 50.0%				
3.3 Best of 4/5/6/7 Completion Rate Change	0	3		Does Not Meet
3.4 Dropout Rate Status	0	3		Does Not Meet
3.5 Dropout Rate Change	1	3		Approaching
*3.6 Dropout Recovery Bonus	1	1		1 Point
*3.7 Dropout Recovery Change Bonus				
4. Student Engagement	**10**	**18**	**56%**	**Meets**
4.1 Attendance Improvement	1	3		Approaching
4.2 Attendance Rate	0	3		Does Not Meet
4.3 Student Satisfaction	3	3		Exceeds
4.4 Truancy Rate	0	3		Does Not Meet
4.5 Parent Satisfaction	6	6		Exceeds
*4.6 Parent Response Bonus				
*4.7 Parent Response Growth Bonus				

How Does the Authorizer's Work Itself Change?

Although the essential functions of effective authorizing translate well to oversight of alternative charters, some tasks require modification and rethinking. Here are some strategies suggested by the Working Group:

1. The Application Process

- Authorizers should "map the gap" in services for at-risk students in their communities. By incorporating this information in a targeted Request For Proposals (RFP) or a "Call for Quality Schools" an authorizer can document the specific need and encourage strong alternative school operators to apply.

- The RFP should make clear that the authorizer is open to non-traditional approaches such as competency-based (rather than grade-based) learning.

- The authorizer should have someone on staff that understands alternative schools—both for overseeing the application and for discharging the authorizer's oversight responsibilities. At a minimum, the application review team must include experts in alternative education.

- In reviewing applications, authorizers should consider whether they provide evidence of the outside supports needed such as specialty contracts and related budgeting for counseling services.

- There must be an in-person interview with the founding team. Authorizers should probe each member's experience, what models they have observed, and their understanding of the program being proposed.

- It is essential to perform due diligence on the applicant's track record. This is especially important when ordinary accountability data is hard to come by. If possible, the application approval process should include a visit to prior sites operated by the petitioner.

The application document should require:

- A crisp and well-focused mission statement identifying the population to be served and the school's approach. The projected student population should be described very specifically. ("At risk" is not enough.)

- A clear plan for reaching the target population through marketing and outreach.

- Compelling evidence that the applicant (especially the proposed leadership) knows the target population and how to serve them.

- Specific metrics that will be used to measure student performance and growth, both academic and personal, including traditional and non-traditional measures.

- Evidence supporting innovative practices that the school will use to motivate consistent attendance, hard work, and performance.

- An enrollment process reflecting the population to be served—for example, multiple enrollment periods, evidence of how the school will address "count date," and a sound policy on backfilling open spots.

- Demonstrated board capacity not only for oversight, but also for cultivating the partnerships and fundraising needed.

2. Monitoring

- Contractual requirements are especially important for identification of performance measures. The charter operator needs to be very clear about any alternative metrics.

- Because the student population may be highly mobile, there may be a need for more interim reporting than is the norm for charter schools; this should be aligned with the school's goals and learning cycles.

- More site visits may be needed. A mobile student population and/or a rolling enrollment policy mean that a school may face substantially different challenges at different points in the year.

- Discipline policy and implementation is critical. Make sure that the authorizer and school understand the implications of suspension/expulsion rates, have correct due process, and know about manifestation hearings for those with Individualized Education Programs (IEPs). These rates should be tracked over time from the student level up.

- Consider using a measure of "instructional time lost" rather than conventional suspension rates.

- Schools should be able to explain the meaning of their attrition and expulsion rates.

- Authorizers should ask AECs to keep track of where "referrals" come from. If there is a recurring pattern of a surrounding district sending its most troubled cases to the alternative charter school, this may be a matter for discussion with the district.

3. The Budget

When authorizers review a budget at application time, or in an annual review, their usual scrutiny should expand to include several points characteristic of alternative campuses:

- What is the path to sustainability, taking into account the extraordinary expenses associated with a given school model?

- Does state funding cover all the age levels the school proposes to serve? (Many states stop funding at 21 although some fund special-education students until later ages.)

- What combination of per-pupil funding and public or private grants will be needed (and how certain are they)?

- Does the staffing ratio reflect programmatic needs?

- Do facilities costs include appropriate space needs for students with IEPs?

- What are the costs of any projected wraparound services, and how are they met?

- Does the budget include sufficient funding for IEP evaluations that are likely to happen more often than in conventional settings, and for additional staff?

4. Renewal

- The authorizer should have an explicit policy that explains the criteria for renewal using both traditional and non-traditional measures.

- Schools should understand the weight given to standard and non-standard measures in the renewal process.

- Renewal decisions should be based on rewarding successes (such as graduation rates for overage, under-credit students, or re-attracting former dropouts) as well as an evaluation of shortcomings.

- Incentives for getting results with a dropout population can be applied to all schools by creating a "graduation index" that gives extra weight to graduating re-engaged dropouts.

5. Public Communications

Finally, although authorizers will be ahead of the game if they adopt these recommendations, they should also understand that stakeholders and the public might not grasp the details easily.

When newspapers print proficiency scores on state assessments, some of their alternative schools will look like failures, whether they deserve that label or not. Authorizers need to make sure that the schools themselves understand how they are being held accountable—and should go to bat for them if they're doing good work that's not captured in the headlines.

At the same time, authorizers who have created unique ways to look at the performance of their alternative charters should invest in plain-English, jargon-free materials explaining them. They should spend time briefing local policymakers and news media about the validity of these measures. Those stakeholders need to know that an authorizer can make a plausible, evidence-based argument to explain a high-stakes decision, even if using different metrics than the familiar state system of accountability.

The Contract is Key

In November 2011, the Denver Board of Education ordered the closure of Life Skills Center of Denver, a state designated Alternative Education Campus focused on dropout recovery. It was the second time the board had sought to shut down the school and this time it stuck. The first attempt, four years earlier, had been appealed to the Colorado State Board of Education, and the operator, White Hat Management, argued successfully that the school had fulfilled the terms of their contracts. On the second attempt the Denver board had two advantages. First, it had put in place a strong performance framework for alternative schools that showed that this school was among the lowest-performing schools in the district even when compared with other alternative schools. Second, the contract included detailed and rigorous mission-specific performance measures that the school itself had proposed. When it failed to meet even those objectives, the case for closure became insurmountable.

Conclusion

Recently the *New York Times* carried a wrenching story about young women attending Carroll Academy, a non-charter alternative school in Tennessee.[16] They lead lives of rural poverty and come from families and communities struggling with drug addiction and chronic unemployment. The school is depicted as a lifeline for the girls. What's especially touching is the girls' determination to keep playing for the academy's basketball team despite its epic losing streak.

But as Alex Medler of NACSA observed in a blog about the story, there's nothing said about whether the school is actually succeeding in educating these young women: "Some AECs likely save the lives of many students. Others are terrible warehouses that temporarily hold kids before putting them on the street. Both the lifesavers and the warehouses get public money…in the meantime. Trouble is, we have a hard time telling the difference, because—like the readers—authorizers generally have no data on how well these schools serve their students."

Policy is too often made by anecdote in the case of alternative schools. Lacking agreement about what to measure—both in the traditional academic domains and in non-cognitive growth or workforce readiness, and ignoring the need for hard evidence of performance, those in authority treat these schools as after-thoughts. Meanwhile, debate rages about accountability for mainstream schools and students.

The shame is that these students, more than any, need assurance that as they do their best to return to school or to hold on amid life's turbulence, someone is making sure that they're not getting shortchanged. Someone needs to be watching—and in the case of charter schools, making sure that the school's operator is fulfilling its end of a contract.

The good news is that most alternative charter school operators want parents, policymakers, and charter authorizers to know they can be relied upon. And they want to clean house. More than anyone, they have an interest in seeing bad actors get out of the alternative schools business.

This report provides some ideas for taking the first steps toward a system that rewards competence and deals factually with failure. It's up to charter authorizers to follow through.

---

[18] John Branch: "That's as Bad as It Gets." New York Times, July 25, 2013. http://www.nytimes.com/2013/07/28/sports/lady-jaguars-thats-as-bad-as-it-gets.html?hpw&_r=1&

The Working Group

Members of the NACSA Working Group on Accountability for Alternative Charter Schools:

- Alison Bagg, Coordinator of Accountability, Office of Charter Schools and School Redesign, Massachusetts Department of Elementary and Secondary Education
- Cliff Chuang: Associate Commissioner, Charter Schools and School Redesign, Massachusetts Department of Elementary and Secondary Education
- Chuck Cook: Chief Executive Officer, Responsive Education Solutions (Texas)
- Chase Davenport: Senior Vice President, Achievement and Performance Management, California Charter Schools Association
- Naomi DeVeaux: Deputy Director, DC Public Charter School Board
- Jody Ernst: Vice President, Research and Policy Analytics, Momentum Strategy and Research
- Tony Gerlicz: Director, Options for Parents, New Mexico Public Education Department
- David Greenberg: Charter School Lead Coordinator, Audubon Center of the North Woods (Minnesota)
- Patricia Hayes: Board Member, Colorado Charter School Institute
- Mikayla Lytton: Manager of Strategy and Analysis, DC Public Charter School Board
- Heather Mauzé: Director, Division of Charter School Administration, Texas Education Agency
- Vasy McCoy: Founding School Leader, ReNEW Accelerated High School (Louisiana)
- Telca K. Porras, formerly Quality Initiatives Senior Advisor, Texas Charter Schools Association
- Ronald Rizzo: Associate Director, Ferris State University Charter Schools Office (Michigan)
- Ernie Silva: Director of External Affairs, SIATech (California)
- Tony Simmons: Program Director, High School for Recording Arts (Minnesota)

NACSA staff and consultants: Nelson Smith, Parker Baxter, Amanda Fenton, Karen Girolami Callam, and Courtney Smith.