

ESSA and Understanding Accountability in Alternative Education  
*An AYPF Thought Leaders' Discussion*  
July 14, 2016  
Washington, D.C.

**Meeting Description**

The recent passage of the Every Student Succeeds Act (ESSA) offers an opportunity for states to revise and redesign accountability systems that can be used proactively to encourage high-quality alternative education settings that are responsive to the needs of at-risk students. In rethinking accountability under ESSA, it is crucial to ensure that *all* students, whether they attend an alternative campus or a traditional school, are adequately prepared for life after high school. Currently, states approach accountability for alternative settings in a variety of ways. To consider the ways in which state accountability plans can be reflective of all the populations they serve, AYPF convened a group of thought leaders from across the country representing national organizations and state departments of education to share ideas, information, and best practices and to guide the development of future resources to ensure all students, including those educated in alternative settings, are accounted for in equitable state accountability systems.

Participants in this meeting were asked to assess the current “state of affairs” of alternative accountability, to explore alternative education and the ways in which accountability can help ensure that the needs of at-risk students are met in all settings, and to discuss the ways in which those in the room could use lessons from states and the opportunities presented by ESSA to inform states in their work to develop new accountability systems that support all students.

**Introduction: ESSA and Understanding Accountability in Alternative Education**

*Zachary Malter, Policy Research Assistant, American Youth Policy Forum*

Mr. Malter began his presentation by defining alternative education as “campuses and programs (settings) that offer students who are struggling or who have left school an opportunity to achieve in a new setting and use creative, individualized learning methods.” Mr. Malter noted that alternative schools make up 6% of all schools and that this number has grown by a third between 2001 and 2014. He then described the types of at-risk students participating in alternative education, such as students who are pregnant or parents, students who have been involved in the juvenile justice system, students with disciplinary problems, students who are re-engaging with school, students who are primary caregivers, students who are wards of the state, and students who are chronically absent. He also identified the different types of alternative settings available across the nation, noting that there is variation across the country in instructional methods, population served, and authorization processes. Mr. Malter then described outcomes in alternative settings, mentioning that although many alternative schools have low graduation rates (below 67%), those at-risk students would have potentially struggled or withdrawn from traditional school settings. Alternative education, therefore, can be an effective strategy for supporting students who are at the highest risk of dropping out of traditional high schools.

Mr. Malter outlined three typical models for Alternative Education Accountability:

1. States that use the same accountability system for alternative settings and traditional schools,
2. States that use a different accountability system for alternative settings and traditional schools,  
and

3. States that figure their alternative setting data into accountability for traditional schools.

Some states use a hybrid approach, combining two or all three of these methods. After touching on the three different models of accountability, Mr. Malter presented the results of an ongoing 50-state scan conducted by AYPF. Based on the 20 states analyzed to date, there is significant variation between states and plenty of opportunities to develop new methods of accountability for alternative settings.

Diving into ESSA, Mr. Malter remarked that the requirement that the bottom 5% of schools have targeted support and intervention may disproportionately affect alternative settings. Other accountability issues under ESSA that may affect alternative settings include the fifth non-academic indicator of student achievement and issues of N-size for subgroups. Going forward, as every state considers which non-academic indicators to adopt for their traditional system, what can we learn from alternative schools, which have already been using non-academic indicators for accountability? Will subgroups in smaller alternative schools be reported on and factored into accountability even in states with a high N-size requirement? Mr. Malter then previewed a forthcoming AYPF paper with the College & Career Readiness & Success Center at AIR that identifies accountability measures in three different domains which account for the college and career readiness of students in alternative settings.

Mr. Malter closed by previewing trends in AYPF's research and future considerations:

1. How do we compare schools who use different accountability measures?
2. Given the diversity of approaches and opportunities under ESSA, what approach to accountability and which measures should states consider to serve all students?
3. Should we encourage a single accountability system or do we need to consider a separate system entirely for alternative settings? Is there potentially a way to do both under a hybrid model?
4. How can measures currently in use in alternative settings inform our development of ESSA's required, non-academic indicator(s)?

### *Questions and Participant Discussion*

Questions following the presentation addressed issues of language and data. Considering that states use different language to address alternative education, participants discussed the ways in which both schools and programs can be better identified as alternative settings. Because there is no standard federal definition for alternative settings, data collection and analysis is quite difficult.

### **Alternative Education Campuses in Colorado**

*Jessica Knevals, Accountability and Policy Principal Consultant, Accountability and Data Analysis Unit, Colorado Department of Education*

Ms. Knevals began her presentation with a brief overview of Alternative Education Campuses (AECs) in Colorado which serve over 16,000 students who are considered special needs or high-risk.<sup>1</sup> In order to

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<sup>1</sup> "High-Risk Student" means a student enrolled in a secondary public school who: 2.04 (A) has been committed to the Department of Human Services following adjudication as a juvenile delinquent or is in detention awaiting disposition of charges that may result in commitment to the Department of Human Services; 2.04 (B) has dropped out of school or has not been continuously enrolled and regularly attending school for at least one semester prior to enrolling in his or her current school; 2.04 (C) has been expelled from school or engaged in behavior that would justify expulsion; 2.04 (D) has a documented history of personal drug or alcohol use or has a parent or guardian

qualify as an AEC in Colorado, the school must provide a nontraditional method of instruction and 90% of attendees must either have an IEP or be classified as high-risk. Prior to 2016, in order to qualify as an AEC, 95% of attendees had to have an IEP or be classified as high-risk, but that was seen as too restrictive given the diversity of the population served by these schools.

Ms. Knevals touched on the difference in performance frameworks between traditional schools and AECs. The AEC accountability framework, developed in 2010, consists of academic growth (35%), postsecondary & workforce readiness (30%), student engagement (20%), and academic achievement (15%). She noted that AECs for lower grades consist heavily of IEP students whereas high school AECs heavily contain high-risk students. Ms. Knevals also noted that AECs may use optional, additional measures if they provide a rationale for why the optional measure reflects the population it serves.

Ms. Knevals next outlined the “accountability clock,” or the five years that schools have to improve before they are potentially taken over by the state. For AECs, Colorado uses different weights to take into account the high-risk populations they serve. Ms. Knevals remarked that without the additional measures and revised cut-points used for AECs, 86% of AECs would be at risk of being taken over by the state as opposed to the 24% that are currently at risk. Ms. Knevals concluded by stating that, although AECs make up only 5% of Colorado schools, they make up 11% of all schools at risk of being taken over by the state.

#### *Final Reflections and Future Considerations*

Ms. Knevals closed with future considerations and challenges. Namely, Colorado needs to revise its current AEC accountability system under ESSA. Knevals stressed the importance of considering the differentiation among AECs in this process and the need to make sure that AECs are measured appropriately based on the population they are serving. She also stressed the importance of collaborating not just with AECs but also with the general district and traditional school communities to problem solve around these challenges. Finally, Ms. Knevals posed the question of whether or not Colorado will be permitted to maintain its current accountability framework moving forward, as it is unclear if a separate system for AECs is allowable under ESSA.

#### **Open Doors – Washington State’s Commitment to Closing the Gap for Opportunity Youth**

*Laurie Shannon, Graduation Specialist/BECCA Liaison, Washington State Department of Education*

Ms. Shannon began her presentation by expressing her excitement for what Washington is currently developing under the Open Doors Youth Engagement program. Washington operates on a three tiered system of schools, with comprehensive high schools as the primary tier, alternative schools as the second tier, and the Open Doors program as the third tier. Ms. Shannon then updated the group on the

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with a documented dependence on drugs or alcohol; 2.04 (E) has a documented history of personal street gang involvement or has an immediate family member with a documented history of street gang involvement; 2.04 (F) has a documented history of child abuse or neglect; 2.04 (G) has a parent or guardian in prison or on parole or probation; 2.04 (H) has a documented history of domestic violence in the immediate family; 2.04 (I) has a documented history of repeated school suspensions; or 2.04 (J) is a parent or pregnant woman under the age of twenty years; 2.04 (K) is a migrant child, as defined in §22-23-103 (2), C.R.S.; 2.04 (L) is a homeless child, as defined in §22-1-102.5 (2), C.R.S.; or 2.04 (M) has a documented history of a serious psychiatric or behavioral disorder, including but not limited to an eating disorder, suicidal behaviors, or deliberate, self-inflicted injury.

present status of the program. Currently, 98 districts are approved to operate the program under four distinct models: district self-operating, partnering with a community organization, partnering with a community or technical college, or partnering across districts in a consortium.

Ms. Shannon then delved into the framework for the Open Doors program. Eligible students must be between 16 and 21 and must be deficient by a certain number of credits. Funding follows the students wherever they go (approximately \$6,309.69 annually per student, the same as schools within the other two tiers) as long as they demonstrate academic progress. For programs to receive funding, the requirements of attendance, weekly status checks, and academic progress (as opposed to seat time) must be met. There is a strong emphasis on fostering partnerships to provide pathways for Open Doors students into postsecondary education and/or workforce training. For example, through leveraging Washington's dual enrollment program, Open Doors students can take vocational and career and technical courses at postsecondary institutions at a prorated price. Open Doors programs also require individual case management mandated by law.

#### *Final Reflections and Future Considerations*

Ms. Shannon ended her presentation by reiterating that whether students are in a comprehensive high school, an alternative setting, or in the Open Doors program, the goals are all the same. Each student needs a pathway to college or career and to a fulfilled life. Open Doors is considering looking at other accountability indicators such as growth mindset that will serve the needs of their at-risk population.

#### **Accountability for California's Alternative Schools**

*Paul Warren, Research Associate, Public Policy Institute of California*

Mr. Warren began his presentation by describing the landscape of alternative schools in California. There are roughly a thousand alternative settings in California that serve over 136,000 students, primarily juniors and seniors. The majority of these alternative settings target students who were expelled, truant, or dropped out of a traditional school. California has seven different types of alternative settings, each with a different target population and administrative oversight structure. Mr. Warren noted that there is not one unifying accountability system over these schools and that most operate independently. These schools are primarily designed to be short-term and the average student is enrolled for less than half a year.

Mr. Warren then described the accountability challenges the system faces. He commented that, while the state does collect annual data, it is hard to accurately capture data because students often cycle through programs and on average do not stay for extended periods of time. He elaborated by asking what end-of-year state test scores mean if they are taken by students who are not there for the full year. There are no state mandated tests for seniors in alternative settings, so Mr. Warren asked what kind of academic data would be a valid metric for assessment. In the past, California's alternative settings had thirteen accountability measures from which they had to choose three. There was no requirement for any indicator to reflect academic achievement or behavior, and Mr. Warren remarked that many alternative settings chose indicators that are all relatively similar to each other (e.g. all behavioral or all academic). Mr. Warren remarked that while this system allowed alternative settings to choose indicators that reflected their mission, it also allowed them to cherry pick their outcomes.

Mr. Warren then walked through the new Local Control Funding Formula (LCFF). Initiated in 2013, the LCFF completely revamped the funding system by eliminating most categorical programs and, among other things, increasing funding for students who are low-income or are classified as English Learners (ELs). The LCFF additionally requires districts to create a Local Control and Accountability Plan (LCAP)<sup>2</sup> to “identify goals and measure progress” for students. In particular, these LCAPs require the tracking of school and student progress on 23 indicators including achievement, school climate, student engagement, parent involvement, and course access with a focus on the overall district performance. Rather than requiring a summative score, the LCFF accountability program creates more of a dashboard model where districts get “colors” for each indicator to paint a more holistic picture of the district. Mr. Warren also clarified that, although LCFF tracks at the district level, school performance is still also tracked. The State Board of Education has not yet discussed whether the accountability framework and measures for traditional schools under LCAPs will be the same as those for alternative schools.

Mr. Warren stressed the importance of needing some way of continuing accountability for the home high school, even for a student who attends an alternative setting, to make sure the home school is still responsible for doing what is in the best interest of that student. Factoring the alternative setting’s performance into a home school’s accountability reduces the incentives home schools might have to send students to alternative settings in order to bypass accountability for them.

#### *Final Reflections and Future Considerations*

Mr. Warren closed by stressing that California has a long way to go in establishing data systems that truly capture what is happening in alternative settings. Since alternative settings in California are currently focused on returning students back into traditional schools as opposed to retaining students until degree completion, they must also work to ensure that there is some form of incentive to make sure that a placement in an alternative setting is actually appropriate for that student.

### **Themes for Future Consideration**

#### *The Need for Robust and Responsive Accountability Systems*

Building on the question of whether or not ESSA affords states the opportunity to develop a separate accountability system, there is a need to clarify how much flexibility they would be granted under ESSA to evaluate alternative settings differently. Specifically, there is a need to understand whether or not states must develop a single accountability system for all settings or if alternative settings can be held accountable through a different system. Stakeholders must also look beyond ESSA and consider other policies that can promote flexibility for alternative settings in terms of accountability as well as investigate supplemental funding sources to ensure that alternative settings are best able to serve their unique populations.

#### *Flexibility of Measures*

Whether or not states include alternative settings in their traditional accountability system or develop a separate one, there is an opportunity to look at the flexibility within measures to ensure they are inclusive of all students, regardless of their setting. The flexibility within measures, which could mean weighing measures differently based on the setting, using different cut points, or developing measures

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<sup>2</sup> To learn more: <http://www.cde.ca.gov/fg/aa/lc/lcffoverview.asp>

equipped to handle the transient nature of the student population in alternative settings, can ensure that state accountability systems are nimble enough for schools to be reflective of the unique populations they serve. We also must consider if optional measures would be useful in alternative education accountability, given the variety among alternative settings and the students they serve.

#### *Opportunities to Inform ESSA's Fifth, Non-Academic Indicator*

As many alternative settings have been collecting data on student engagement and behavior, school safety, school climate, and/or social and emotional measures, we must consider the opportunity to learn from their efforts to inform the development of ESSA's fifth accountability indicator. In many states, these measures have been used effectively for accountability for alternative settings, either as required or optional measures.

#### *Comparability*

Currently, within accountability for alternative settings, states have had to strike a balance between having flexible measures across schools and districts to reflect variability while also maintaining some uniformity in order to make reliable comparisons across schools, districts, and states. Data collection, analysis, and cross-school comparisons become more difficult when the measures used are not consistent across schools. Accountability systems will be useful when they reveal how alternative schools are doing relative to their peers, while recognizing the specific context of each alternative setting.