

**ESEA FLEXIBILITY  
Amendment Submission Template**

Dear Assistant Secretary:

I am writing on behalf of the Alaska Department of Education and Early Development to request approval to amend Alaska's approved ESEA Flexibility request. The relevant information, outlined in the *ESEA Flexibility Amendment Submission Process* document, is provided in the table below.

<b>Flexibility Element(s) Affected by the Amendment</b>	<b>Brief Description of Element as Originally Approved</b>	<b>Brief Description of Requested Amendment</b>	<b>Rationale</b>	<b>Process for Consulting with Stakeholders, Summary of Comments, and Changes Made as a Result</b>
2.A.i—State-Developed Recognition, Accountability, and Support System	See page 57 in approved waiver, page 58 in redline version. Originally, we included language for schools that had 25 or fewer students in the graduation cohort and proposed a maximum of 50 points on the ASP1 if schools had a cohort of 2 or fewer students.	We propose to modify the language for schools with small size graduation cohorts for more clarity and functionality within the new Alaska School Performance Index in the state accountability system.	The new language will base the ASP1 graduation rate indicator on a cohort size of at least 7 students, which allows a school to have 1 student not graduate from the cohort, and still reach a graduation rate of 85%. The calculation will use data aggregated up to three years to reach a cohort size of 7. This will make it mathematically possible to earn 90 ASP1 points if all but one student graduates. If it is not possible to reach at least 7 students in neither the four-year nor the five-year aggregated graduation cohort, then the	We sent an email to all LEAs inviting comment and posted a public notice on our website. We invited discussion at two webinars on February 11 and 12 announced to all LEAs. The change is being proposed in state regulations and is expected to be put out for public comment at the March 14 State Board meeting for further comment before final adoption proposed in June. Comments received orally during the webinars and in writing were all in favor of the change.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0581.

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<p>2.A.i—State-Developed Recognition, Accountability, and Support System</p>	<p>See page 67 and again on page 93. The approved waiver specified 4 criteria applied to any subgroup that would require a school with 3, 4, or 5 star ASPPI rating to submit a school improvement plan:</p> <ol style="list-style-type: none"> <li>1. missing AMO targets for two years in a row;</li> <li>2. a decline in the growth &amp; proficiency index;</li> <li>3. missing the participation rate; or</li> <li>4. missing the graduation rate target</li> </ol>	<p>The proposed amendment would remove the decline in the growth &amp; proficiency rate index as criteria for triggering the need for a school improvement plan, leaving the remaining three criteria in place. The amendment would also clarify that all schools with 3 star ratings would submit a school improvement plan to the district, and only 4- or 5-star schools would create plans if one or more of the three criteria are met.</p>	<p>The criteria that a school has had a decline in the growth and proficiency index was determined to be redundant. If the school has a declining subgroup growth and proficiency index, then it will also be missing one or more AMO targets and will be required to create a school improvement plan based on those criteria. There are no schools that would not be required to submit a school improvement plan if this criteria is removed.</p>	<p>submitted in response to the invitation to comment.</p> <p>We sent an email to all LEAs inviting comment and posted a public notice on our website. We invited discussion at two webinars on February 11 and 12 announced to all LEAs. The change is being proposed in state regulations and is expected to be put out for public comment at the March 14 State Board meeting for further comment before final adoption proposed in June. Comments received orally during the webinars and in writing were all in favor of the change.</p> <p>Attached are LEA comments submitted in response to the invitation to comment:</p>

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2.A.i—State-Developed Recognition, Accountability, and Support System	See page 61 in approved waiver, 63-65 in redline version. The Alaska School Performance Index was originally created and applied to all types of schools equally with different indicators and weightings based only on the percent of students enrolled in grades K-8 and 9-12 in any given school.	A new section has been added starting on page 61 of the original waiver document to outline the proposed modifications of the following elements of the 9-12 grade indicators of ASPPI for alternative secondary schools (those that serve students in grades 7-12 that are specifically designed to serve high-risk students). 1. Modify the ASPPI points received for attendance, graduation rate, and WorkKeys participation rate to better reflect the reality of the data in these schools, yet also serve as stretch	The department received positive response from educators and the public to the new school accountability system, with the exception of alternative schools. The ASPPI metric did not differentiate between alternative schools; they were all clustered in the bottom range of the star ratings. In 2013, approximately 5% of traditional schools with 12 <sup>th</sup> graders received a 5 star rating, while 0% of alternative schools received a 5 star rating. Additionally, only 29% of traditional schools serving 12 <sup>th</sup> graders received a 1 or 2 star rating while 87% of alternative schools were classified with 1 or 2 stars. The highest designation for any alternative school in the state was 3 stars, and only 13% of alternative schools achieved this rating level while 71% of traditional schools serving 12 <sup>th</sup> graders have 3 or more stars. ASPPI also created an unintended consequence of potentially	EED constructed a workgroup to analyze precisely how each of ASPPI's metrics affect alternative schools and to make draft recommendations for possible modifications to ASPPI for alternative Schools. The workgroup was composed of veteran alternative school principals, the President of the Alaska State Alternative Schools Association, and staff members of the Alaska Department of Education & Early Development.  We sent an email to all LEAs inviting comment and posted a public notice on our website. We invited discussion at two webinars on February 11 and 12 announced to all LEAs. The change is being proposed in state regulations and is expected to be put out for public comment at the March 14 State Board meeting for further comment before final adoption; proposed in June. Comments received orally during

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		<p>goals to provide incentives for these schools to continue to improve in these areas.</p> <p>2. Reduce the academic achievement weight from 20% to 10% and increase the school progress weight from 40% to 50% to better reflect the areas in which alternative schools have the greatest ability to impact student performance.</p>	<p>creating a disincentive for the schools to enroll the very students they are created to serve – those that are behind academically, not on track to graduate within four years, and experiencing many life challenges that impact their public school performance. Enrolling these students makes achieving a star rating above 3 stars mathematically implausible under the current ASPI and does not provide the schools with a clear path to improve the scores.</p> <p>Specific changes proposed are:</p> <p>1. Modify the ASPI points received for attendance so that a school would have received 100 points for attendance rates from 88.00-100% as compared to 96-100% for non-alternative schools, and adjust the remaining points as shown in the redline waiver document. The average attendance rate calculated by aggregating all attendance data for alternative schools was 77.8%</p>	<p>the webinars and in writing were all in favor of the change.</p> <p>Attached are LEA comments submitted in response to the invitation to comment.</p>

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			<p>and for non-alternative schools with 12<sup>th</sup> graders was 91.8%. Under the current ASPI metric, only 13.3% of alternative schools received 80 or more points for attendance as compared to 55.2% of non-alternative schools with 12<sup>th</sup> graders. Under the proposed change, 40% of alternative schools would receive 80 or more points for attendance. Reaching the target of 88% attendance rate in order to achieve 100 points represents an ambitious goal for alternative schools.</p> <p>2. Modify the ASPI points received for both the 4-year and 5-year graduation rates. A school would receive 100 points for either a 4 or 5 year graduation rate from 75-100% as compared to 98-100% for non-alternative schools, and adjust the remaining points as shown in the redline waiver document.</p> <p>The average 4-year graduation</p>	

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			<p>rate calculated by aggregating all graduation data for alternative schools was 35.4% compared to 74.7% for non-alternative schools with 12<sup>th</sup> graders and the average 5-year graduation rate calculated by aggregating all graduation data for alternative schools was 50.6% compared to 76.8% for non-alternative schools with 12<sup>th</sup> graders. The maximum 4-year graduation rate for an individual alternative school was 60%. The median rate was 34.7% for alternative schools compared with a median of 66.7% for non-alternative schools. The maximum 5-year graduation rate for an individual alternative school was 73.8%. The median was 50% for alternative schools compared with 68.8% for non-alternative schools. Under the current ASPI metric, 73% of alternative schools received 0 points for the graduation rate as compared to 26% of non-alternative schools. Under the</p>	

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			<p>current ASPI metric, 0 % of alternative schools received 50 or more points for graduation rate as compared to 51% of non-alternative schools with 12<sup>th</sup> graders. Under the proposed change, 53% of alternative schools would receive 50 or more points for graduation rate and 20% would have received 70 or more points as compared to 38% for non-alternative schools with 12<sup>th</sup> graders. Reaching the target of 75% on either the 4-year or 5-year graduation rate to earn 100 points represents an ambitious goal for alternative schools.</p> <p>3. Modify the ASPI points received for WorkKeys participation rate so that a school would have received 100 points for rates from 85.00-100% as compared to 95-100% for non-alternative schools, and adjust the remaining points as shown in the redline waiver document. The average WorkKeys participation</p>	

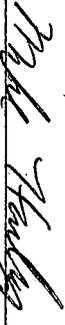
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			<p>rate calculated by aggregating all WorkKeys participation data for alternative schools was 66.0% and for non-alternative schools was 82.3%. 46% of the non-alternative schools earned 100 points vs. 13% of the alternative schools under the current ASPI metric, and 87% of the alternative schools earned 0 points. Under the proposal 27% of the alternative schools would still earn 0 points and 13% would earn 100 points, but 60% would earn 50 points.</p> <p>4. In the high school indicators of ASPi, reduce the weighting of the academic achievement indicator to 10% and increase the weighting of the student progress indicator to 50%. The average value for the academic achievement indicator calculated by aggregating the data for all alternative schools was 47.50 as compared to 72.90 for non-alternative schools with 12<sup>th</sup></p>	

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			<p>graders. The average value for the school progress indicator calculated by aggregating the data for all alternative schools was 87.79 as compared to 92.15 for non-alternative schools with 12<sup>th</sup> graders. While student progress better reflects growth and achievement within the alternative schools, academic achievement is a poorer indicator or alternative schools which primarily receive students from traditional schools with a history of being below proficiency.</p> <p>The overall effect of these changes on the ASPJ scores and star ratings is to create a distribution of ASPJ scores and star ratings that differentiate within the alternative schools and that is more comparable to non-alternative schools with 12<sup>th</sup> graders. The distribution of alternative schools under the current ASPJ metric is 5 stars – 0%, 4 stars – 0%, 3 stars – 13%, 2</p>	

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			<p>stars – 27%, 1 star – 60%. The distribution of alternative schools under the proposed revisions would be 5 stars – 0%, 4 stars – 7%, 3 stars – 40%, 2 stars – 27%, 1 star – 27%. In comparison, the distribution of non-alternative schools with students in grade 12 under the current ASPI metric is 5 stars – 5%, 4 stars – 24%, 3 stars – 43%, 2 stars – 15%, 1 star – 13%.</p>	

Attached to this letter is a redlined version of the pages from our approved ESEA flexibility request that would be impacted with strikeouts and additions to demonstrate how the request would change with approval of the proposed amendments. Please contact Margaret Mackinnon at [margaret.mackinnon@alaska.gov](mailto:margaret.mackinnon@alaska.gov) or by phone at 907-465-2970 if you have any questions regarding these proposed amendments.

The Alaska Department of Education and Early Development acknowledges that the U.S. Department of Education may request supplementary information to inform consideration of this request.

  
 Chief State School Officer

3/12/14  
 Date

Milke Hanley, Commissioner