



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of Education &
Early Development**

DIVISION OF TEACHING & LEARNING SUPPORT

810 West 10th Street, Suite 200
P.O. Box 110500
Juneau, Alaska 99811-0500
Main: 907.465.2830
Fax: 907.465.6760

To: Superintendents

cc: Title I/Federal Programs Coordinators

From: Margaret MacKinnon
Title I/ESEA Administrator

Date: February 10, 2014

Subject: Notification of intent to amend Alaska's ESEA Flexibility Waiver

The Alaska Department of Education & Early Development is planning to request amendments to its approved ESEA Flexibility Waiver of certain requirements of the Elementary and Secondary Education Act. These amendments apply to Principle 2, State-Developed Differentiated Recognition, Accountability, and Support. The amendments will include a modified Alaska School Performance Index for secondary alternative schools and will make one change in the criteria that would require a higher-performing school to submit a school improvement plan. The background and the proposed changes are outlined below. The department is requesting comments about these proposed changes by **February 19**. These changes will also be proposed in state regulation, and will be available for public comment during that process as well.

The department is hosting two audio conferences to explain and answer questions about these proposed changes. Please call in to either time that is convenient for you and/or your staff.

- **Tuesday, February 11** **3:30 pm** **Call in number 800-315-6338, passcode 2970#**
- **Wednesday, February 12** **10:30 am** **Call in number 800-315-6338, passcode 2970#**

Required Notice and Invitation for Comments

This notice is to meet the notification requirements under Section 9401(b)(3)(A)(i) of the Elementary and Secondary Education Act. **Districts are invited to submit comments to the department regarding this amendment to its ESEA Flexibility Waiver no later than February 19, 2014. After that date, the department will submit the district comments to the US Department of Education (USED) along with its amended waiver request. Comments may be submitted to Margaret MacKinnon by email at margaret.mackinnon@alaska.gov or by fax at 907-465-2989.**

Information and a copy of Alaska's currently approved ESEA Flexibility Waiver can be found at this link:
<http://education.alaska.gov/akaccountability/#c3gtabs-esea>.

Background and Proposed Changes

For All Schools

Graduation Rate ASPI indicator for small schools: Alaska is proposing a modification of the current language on page 57 of the approved waiver relating to the graduation rate indicator in ASPI for schools with a small cohort. The new language will base the ASPI graduation rate indicator on a cohort size using data aggregated up to three years that will make it mathematically possible to earn 90 ASPI 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 graduation rate indicator will not be included in that school's ASPI score. The new proposed language is:

For schools that have six or fewer students in either the four- or five-year cohort or both for the current year (the denominator of the fraction used to compute the graduation rate), the four- and five- year graduation rates will be calculated by aggregating the graduation rate data for up to three consecutive years so that the aggregated cohort (denominator of the fraction) is greater than six for each of the specified four- and five-year rate.

When there are insufficient data to make a graduation-rate determination with a cohort of at least seven students over three consecutive years in either (but not both) the four- or five-year cohort, the school will receive points based upon the four- or five-year cohort in which the graduation rate can be calculated with at least seven students. In cases when there are insufficient data to make a graduation-rate determination with a cohort of at least seven students over three consecutive years in neither the four- or five-year cohorts, the graduation-rate indicator and its weight in the overall ASPI score will be removed from the calculation.

School Improvement Plans: Alaska's approved waiver requires generally high performing schools with 4 and 5 stars to create a school improvement plan if any of the following criteria are met: the school misses AMO targets in any one subgroup for two years in a row, the school has a declining subgroup growth and proficiency index over a period of two years, the school has a subgroup that missed the participation rate, or that has a subgroup that missed its graduation rate target. **The department is proposing to remove the requirement that a 4 or 5 star school must create a school improvement plan if there is a decline in the subgroup growth and proficiency index.** 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.

For Alternative Schools

Alternative Schools: Alaska submitted its ESEA Flexibility Waiver proposal in September 2012 and received approval by the US Department of Education on May 20, 2013. Prior to the submission of the initial waiver proposal and through the process of public comment on revised accountability regulations, the department received input from stakeholders on the components of the new accountability system. Since the Alaska School Performance Index data was released there has been an exceptionally positive response to it from schools, with most indicating that ASPI accurately reflects their schools' performance and provides them with a clear roadmap for improving their school rating. Unfortunately, Alaska's alternative schools are an exception to the rule. ASPI's metrics were fashioned to measure the performance in a traditional school model, and their applicability for alternative schools was quickly called into question. Concerns over the Alaska School Performance Index's applicability to alternative schools have been raised by alternative school administrators, by the Alaska State Alternative School Association, by the press, and by legislators.

Alaska currently has 15 alternative schools that have been tailored to exclusively serve high-risk secondary students. Their students arrive with the following characteristics: credit deficient, below proficient, a history of

low attendance, in imminent danger of dropout and/or history of dropout, and with a heightened prevalence of barriers to learning like homelessness, poverty, untreated mental health issues like depression and social anxiety, teen parenting, substance use and abuse, and unaddressed health issues.

The alternative schools' primary concern with ASPI is that they see many of its metrics disadvantaging them by holding them accountable for conditions they neither created nor have control over. (For example, enrolling severely credit deficient juniors or seniors resulted in 12 of the 15 alternative schools receiving zero of the graduation rate points (0 of the 20 possible overall ASPI points.) They argue that enrolling the very students they were created to support makes achieving a star rating above 3 mathematically implausible, inaccurately reflects the school progress they attain, and disallows them from accurately differentiating between the quality of the state's alternative schools. A departmental analysis of star ratings revealed alternative school ASPI star ratings do profile much differently than the ASPI ratings from Alaska's traditional schools that enroll 12th graders. (ASPI utilizes a 5 star rating system with 5 stars being the highest rating and 1 star being the lowest.) In 2013, approximately 5% of traditional schools with 12th graders received 4 or 5 star ratings, while 0% of alternative schools received a 4 or 5 star rating. Additionally, only 29% of traditional schools serving 12th 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 12th graders have 3 or more stars.

EED constructed a workgroup to analyze precisely how each of ASPI's metrics affect alternative schools and to make draft recommendations for possible modifications to ASPI for alternative Schools. The workgroup was composed of veteran alternative school principals, the President of the Alaska State Alternative Schools Association, and members of the Alaska Department of Education & Early Development. The department intends to propose the attached changes to the ASPI metrics for alternative schools based on recommendations from the workgroup. The effect of these changes will be to more accurately reflect the progress of the alternative schools as well as to differentiate among the group of alternative schools.

Proposed Definition of Alternative School (for purpose of ASPI calculations)

An alternative school is an established school with a graduation program whose intended purpose is to provide individualized education to at-risk students in imminent danger of dropping out of public education. Alternative schools share the core mission of reconnecting struggling students to their education and ultimately, to graduation. Alternative schools provide tailored educational services to students in grades 7-12 who have not experienced success in traditional school environments, typically characterized by elevated levels of credit deficiency, non-proficiency, and absenteeism. It is important to note that an alternative school is not a program within a larger school, whether a traditional school, charter school, or correspondence school.

Proposed Recommendations for changes to ASPI

These changes are proposed for the grades 9-12 component of the ASPI metric. The grades 7-8 component of the ASPI metric would remain unchanged for these alternative schools.

1. School Progress:

Recommend increasing the weighting of this ASPI element from 40% to 50%.

Justification: The school progress component of ASPI reflects the work alternative schools accomplish more accurately than any of the other ASPI metrics: it holds the schools fully accountable for moving students forward academically while empowering them to accept students where they are. School progress is the ASPI element most within the school's control to influence. The subgroups reflect the

highest achievement gaps of Alaska students and as such reflect alternative school population needs. School progress measures growth of individual students on a continuous scale.

2. Academic Achievement:

Recommend modifying the weighting of this ASPI component; decreasing it from 20% to 10%.

Justification: This recommended reduction is interrelated to the recommendation to increase school progress by 10%. While student progress better reflects growth and achievement within the alternative schools, academic achievement is a poorer indicator of alternative schools which primarily receive students from traditional schools with a history of being below proficiency.

The changes proposed are reflected in the chart below:

Proposed Alternative Schools 9-12	
Category	Weighting
Academic Achievement - % of all students proficient or above (average of % proficient on reading, writing and mathematics SBAs)	10%
School Progress - growth and proficiency index score for all students group and for each primary subgroup (AN/AI, economically disadvantaged, SWDs, and ELs)	50%
Attendance Rate (all students)	10%
Graduation rate (cohort of all students)	20%
College & Career Readiness Indicator (12 th -graders at score levels on WorkKeys, ACT, or SAT)	8%
WorkKeys participation rate (11 th -graders)	2%
Total	100%

3. Graduation Rate:

Recommend modifying the graduation rate metrics as shown in the following chart.

Justification: The proposed changes to the graduation rate will work to support alternative schools' inclusive and flexible enrollment practices and to prevent alternative school program changes to meet ASPI. The graduation rates and point values proposed will set ambitious but achievable graduation goals for these schools. Under the current ASPI metrics, 12 of the 15 alternative schools received zero points and none received more than 25 of the 100 possible graduation points (5 out of the 20 possible weighted graduation points on the 100 point ASPI scale).

Alternative Schools Proposed Graduation Rate		
4-year rate	5-year rate	Points
75-100	75-100	100
65-74	70-74	95
60-64	65-69	90
55-59	60-64	70
45-54	50-59	50
40-44	45-49	25
35-39	40-44	10
Below 35	Below 40	0

4. Attendance Rate:

Recommend modifying the attendance rate metrics as shown in the following chart.

Justification: This modification adjusts for the student demographic served and reflects the hardships alternative school students face in attending school regularly (homelessness, teen parenting, poverty, mental health issues, care for siblings, substance abuse etc.) It is the rule rather than the exception for alternative schools to accept students with life challenges that resulted in histories of poor attendance and non-attendance (or dropping out) while enrolled in traditional schools. The attendance rate ranges and point values proposed will set ambitious but achievable attendance goals for these schools. Under the current ASPI metrics most alternative schools earned fewer than 25 of the 100 attendance rate points (fewer than 3 weighted points on the ASPI scale).

Alternative Schools Proposed	
Attendance Rate	Points
88.00%-100%	100
83.00-87.99%	95
78.00%-82.99%	80
73.00-77.99%	50
65.00%-72.99%	25
Below 65.00%	0

5. Work Keys Participation Rate:

Recommend modifying the participation rate for Work Key metrics as shown in the following chart:

Justification: For the same challenges identified under attendance 95% participation rate is not realistic for alternative schools—13 of 15 alt schools received no ASPI participation points for Work Keys and the average participation rate was 60-70%. As many alternative schools are small a few students can heavily impact this area.

Alternative Schools Proposed	
WorkKeys Participation Rate	Points
85%-100%	100
60%-84%	50
0%-59%	0