

that affects feeder patterns may cause a district to change pairing. A change in a pairing relationship does not change accountability ratings assigned in previous years to either campus.

## Non-Traditional Education Settings

Even though districts are responsible for the performance of all their students, statutory requirements affect the rating calculations for residential treatment facilities (RTF), Texas Juvenile Justice Department (TJJD), juvenile justice alternative education program (JJAEP), and disciplinary alternative education program (DAEP) campuses.

## Inclusion or Exclusion of Performance Data

The performance of students served in certain campuses cannot be used in evaluating the district where the campus is located. Texas Education Code (TEC) §39.055 requires that students ordered by a juvenile court into a residential program or facility operated by the TJJD, a juvenile board, or any other governmental entity or any student who is receiving treatment in a residential facility be excluded from the district and campus when determining the accountability ratings. Please see Appendix G.

## Student Attribution Codes

Districts with RTF or TJJD campuses are required to submit student attribution codes in TSDS PEIMS.

## JJAEPs and DAEPs

State statute and statutory intent prohibit the attribution of student performance results to JJAEPs and DAEPs. Each district that sends students to a JJAEP or DAEP is responsible for properly attributing all performance and attendance data to the home campuses according to the Texas Education Data Standards and testing guidelines.

## Special Education Campuses

Campuses where all students are served in special education programs and tested on STAAR are rated on the performance of their students.

## AEA Provisions

Alternative performance measures for campuses serving at-risk students were first implemented in the 1995–96 school year. Over time, these measures expanded to include charter schools that served large populations of at-risk students. Accountability advisory groups consistently recommend evaluating AECs by separate AEA provisions due to the large number of students served in alternative education programs on AECs and to ensure these unique campus settings are appropriately evaluated for accountability.

AEA provisions apply to and are appropriate for

- campuses that offer nontraditional programs, rather than programs within a traditional campus;
- campuses that meet the at-risk enrollment criterion;
- campuses that meet the grades 6–12 enrollment criterion;
- open-enrollment charter schools that operate only AECs; and
- open-enrollment charter schools that meet the AEC enrollment criterion.

## AEA Campus Identification

AECs, including charter school AECs, must serve students at risk of dropping out of school as defined in TEC §29.081(d) and provide accelerated instructional services to these students. The

performance results of students at registered AECs are included in the district's performance and used in determining the district's accountability rating.

The following types of campuses have the option to register for evaluation by AEA provisions:

- AEC of choice – At-risk students enroll at AECs of choice to expedite progress toward performing at grade level and high school completion.
- Dropout recovery school (DRS) – Education services are targeted to dropout prevention and recovery of students in grades 9–12, with enrollment consisting of at least 50 percent of the students 17 years of age or older as of September 1, 2018, as reported for the fall semester TSDS PEIMS submission.

In this manual, the terms *AEC* and *registered AEC* refer collectively to AECs of choice, residential facilities, and dropout recovery schools that are registered for evaluation by AEA provisions and meet the at-risk and grades 6–12 enrollment criteria.

DAEPs, JJAEPs, and stand-alone Texas high school equivalency certificate (TxCHSE) programs are ineligible for evaluation by AEA provisions. Data for these campuses are attributed to the home campus.

### **AEA Campus Registration Process**

The AEA campus registration process is conducted online using the TEAL Accountability application. AECs rated by 2018 AEA provisions are re-registered automatically in 2019, provided the campus continues to meet enrollment and at-risk criteria as determined by TSDS PEIMS October snapshot data. Filing an *AEA Campus Registration Form* is required for each AEC not on the list of registered AECs that wishes to be evaluated by 2019 AEA provisions. The 2019 registration process occurred March 25 –April 5, 2019.

### **AEA Campus Registration Criteria**

Campuses must meet thirteen criteria to register for AEA. However, the requirements in criteria 8–13 may not apply to charter school campuses (depending on the terms of the charter) or for community-based dropout recovery campuses established in accordance with TEC §29.081(e).

- 1) The AEC must have its own county-district-campus number for which TSDS PEIMS data are submitted and test answer documents are coded. A program operated within or supported by another campus does not qualify.
- 2) The AEC must have its own county-district-campus number on TSDS PEIMS October snapshot day (October 26, 2018).
- 3) The AEC must be identified in AskTED (Ask Texas Education Directory database) as an alternative instructional campus. This is a self-designation that districts and charter schools request via AskTED.
- 4) The AEC must be dedicated to serving students at risk of dropping out of school as defined in TEC §29.081(d). Each AEC must have at least 75 percent at-risk student enrollment at the AEC verified through current-year TSDS PEIMS fall enrollment data.
- 5) At least 50 percent of students at the AEC must be enrolled in grades 6–12 verified through current-year TSDS PEIMS fall enrollment data.
- 6) The AEC must operate on its own campus budget.
- 7) The AEC must offer nontraditional settings and methods of instructional delivery designed to meet the needs of the students served on the AEC.

- 8) The AEC cannot be the only middle school or high school listed for its district in AskTED.
- 9) The AEC must have an appropriately certified, full-time administrator whose primary duty is the administration of the AEC.
- 10) The AEC must have appropriately certified teachers assigned in all areas including special education, bilingual education, and/or English as a second language (ESL) to serve students eligible for such services.
- 11) The AEC must provide each student the opportunity to attend a 75,600-minute school year as defined in TEC §25.081(a), according to the needs of each student.
- 12) If the campus has students served by special education, the students must be placed at the AEC by their Admission, Review, and Dismissal (ARD) committee. If the campus is a residential facility, the students must have been placed in the facility by the district.
- 13) Students served by special education must receive all services outlined in their current individualized education programs (IEPs). English learners (EL) must receive all services outlined by the language proficiency assessment committee (LPAC). Students served by special education or language programs must be served by appropriately certified teachers.

### **At-Risk Enrollment Criterion**

Each registered AEC must have at least 75 percent at-risk student enrollment on the AEC verified through current-year TSDS PEIMS fall enrollment data in order to be evaluated by AEA provisions. TEC §29.081 defines thirteen criteria used to identify students as “at-risk of dropping out of school”. Districts and charter schools must identify students in TSDS PEIMS who meet one or more of the thirteen criteria. The at-risk enrollment criterion restricts use of AEA provisions to AECs that serve large populations of at-risk students and enhances at-risk data quality.

*Prior-Year Safeguard.* If a registered AEC does not meet the at-risk enrollment criterion in the current year, it remains registered for AEA if the AEC meets the at-risk enrollment criterion in the prior year. For example, an AEC with an at-risk enrollment below 75 percent in 2019 that had at least 75 percent in 2018 remains registered in 2019.

### **Grades 6–12 Enrollment Criterion**

In order to be evaluated by AEA provisions, each registered AEC must have at least 50 percent student enrollment in grades 6–12 based on total students enrolled (early education–grade 12) verified through current-year TSDS PEIMS fall enrollment data. The grades 6–12 enrollment criterion restricts use of AEA provisions to middle and high schools.

### **Final AEA Campus List**

The final list of AEA campuses is posted on the TEA website in April at which time an email notification is sent to all superintendents.

The *2019 Final AEA Campus List* includes DRS designations. If at least 50 percent of the students enrolled at an AEA campus are 17 years of age or older as of September 1, 2018, then the AEC of choice is designated as a DRS (TEC §39.0548).

## AEA Charter School Identification

Charter school ratings are based on aggregate performance of the campuses operated by the charter school. Performance results of all students in the charter school are used to determine the charter school’s accountability rating and distinction designations.

- Charter schools that operate only registered AECs are evaluated by AEA provisions.
- Charter schools that operate both non-AEA campuses and registered AECs are evaluated by AEA provisions if the AEC enrollment criterion described below is met.
- Charter schools that operate both non-AEA campuses and registered AECs that do not meet the AEC enrollment criterion described below do not qualify for evaluation by AEA provisions.
- Charter schools that operate only non-AEA campuses do not qualify for evaluation by AEA provisions because the campuses choose not to register for AEA evaluation, do not meet the at-risk criteria, or do not meet the grades 6–12 enrollment criteria.

## AEC Enrollment Criterion for Charter Schools

A charter school that operates both non-AEA campuses and registered AECs is eligible for evaluation by AEA provisions if at least 50 percent of the charter school’s students are enrolled at registered AECs. AEC enrollment is based on total students enrolled (early education–grade 12) verified through current-year TSDS PEIMS fall enrollment data.

## Final AEA Charter School List

After the AEA Campus List is finalized, AEA charter schools eligible for evaluation by AEA provisions are identified. The final list of AEA charter schools is posted on the TEA website in April, at which time an email is sent to all superintendents.

## AEA Modifications

“Chapter 2—Student Achievement Domain” and “Chapter 5—Calculating 2019 Ratings” describe the provisions and targets used to evaluate AEA campuses and AEA charter schools.

# Alternative Education Accountability Registration Criteria History

## History

Enacted by the Texas Legislature in 1993, accountability legislation mandated the creation of an accountability system for all Texas schools. This accountability system integrated the statewide curriculum; the state criterion-referenced assessment system; district and campus accountability; district and campus recognition for high performance and significant increases in performance; sanctions for poor performance; and school, district, and state reports.

As a result of statewide educator feedback, an alternative set of performance measures for campuses serving at-risk students was developed in late 1994 and implemented in the 1995–96 school year. In order for a campus to qualify as alternative, it was required to serve one or more of the following student populations: students at risk of dropping out; recovered dropouts; pregnant or parenting students; adjudicated students; students with severe discipline problems; or expelled students.

For the 1995–96 school year, alternative accountability ratings were based on state-approved district proposals that included student performance indicators, current-year data, and comparisons of pre- and post-assessment results. Following a review of campus data by the local board of trustees, each district made an initial determination of the campus rating. This initial determination was then forwarded to the TEA where it was reviewed by a panel of peer reviewers who sent a recommendation to the commissioner.

From the 1995–96 to 2001–02 school years, revisions were made to the ratings criteria and procedures determined by an ad hoc Alternative Education Advisory Committee:

- Minimum performance levels for an Acceptable rating were established in 1996–97.
- Beginning in 1996–97, school districts were required to select campus-based performance indicators from a menu of state-established indicators.
- In 1997–98, TEA staff assumed responsibility for the review and analysis of all campus performance data.
- In 1999–00, TEA required that the rating for each AEC be determined on three base indicators: Texas Assessment of Academic Skills (TAAS) passing rates for reading and mathematics, dropout rates, and attendance rates.
- In 1999–00, disciplinary alternative education programs (DAEPs) and juvenile justice alternative education programs (JJAEPs) were no longer permitted to register for AEA. Instead, the performance of students served in these programs was attributed to the campuses where these students would otherwise have attended.
- In 2000–01, campuses were required to serve "students at risk of dropping out of school" as defined in Texas Education Code (TEC) §29.081 in order to be eligible to receive an accountability rating under AEA procedures.

House Bill 6, enacted by the 77th Texas Legislature, called for a pilot program to examine issues surrounding accountability of alternative education programs. The purposes of this pilot were to analyze the existing status of AECs and to make recommendations regarding the methods of evaluating the performance of these campuses. In order to achieve these purposes, the following activities were undertaken in 2002:

- a set of surveys for principals, teachers/counselors, parents, and students at all AECs was administered;
- a more detailed survey was administered and follow-up telephone calls were made to a small sample of AECs;

## Alternative Education Accountability Registration Criteria History

- an analysis of existing Public Education Information Management System (PEIMS) data was undertaken; and
- individual student data from a small sample of AECs was compiled and analyzed.

Results of the pilot program were published in the Report on the Alternative Education Accountability Pilot (Texas Education Agency, December 1, 2002).

While these pilot activities were conducted, No Child Left Behind Act of 2001 (NCLB), Public Law 107–110, was signed into law. This federal legislation, which focused on increasing state and school accountability for student progress, was considered as part of the pilot project report. Accountability provisions of NCLB required that all campuses, including AECs, be evaluated annually for Adequate Yearly Progress (AYP).

The 2003 Educator Focus Group on Accountability made a recommendation to develop new AEA procedures for 2005 and beyond. The new AEA procedures were based on the following guidelines:

- The AEA indicators must be based on data submitted through standard data submission processes such as PEIMS or by the state testing contractor.
- The AEA measures should be appropriate for alternative education programs offered on AECs rather than just setting lower standards on the same measures used in the standard accountability procedures. Furthermore, these measures should ensure that all students demonstrate proficiency on the state assessments in order to graduate.
- The Texas Growth Index (TGI) and other improvement indicators should be evaluated as base indicators for AEC ratings.
- Additional AEA criteria should be researched. For example, AECs should have a minimum percentage of at-risk students (based on PEIMS data reported on current year fall enrollment records) to be evaluated under AEA procedures.

Also, in 2003, ratings for all campuses were suspended for one year while the new Texas Assessment of Knowledge and Skills (TAKS) assessments were implemented for the first time and the new state accountability system was developed. In 2004, registered AECs received a rating of Not Rated: Alternative Education while new AEA procedures were developed.

In 2005, an AEA Educator Focus Group developed recommendations for the commissioner for AEA criteria. In March 2005, Commissioner Shirley Neeley issued Alternative Education Accountability Procedures for 2005 and Beyond: Commissioner of Education Final Decisions. These final decisions included revised AEA procedures which contained indicators for AECs with increased rigor phased in over time and included a specific at-risk percentage registration criterion.

Registration Criteria. To be evaluated under AEA procedures, each AEC must have met the following registration criteria.

- a) The AEC must have its own county–district–campus number that is used for submitting PEIMS data and coding test answer documents;
- b) The AEC must be identified in AskTED (Texas School Directory database) as an alternative campus;
- c) The AEC must be dedicated to serving “students at risk of dropping out of school” as defined in Texas Education Code (TEC) §29.081(d);
- d) The AEC must operate on its own campus budget;

## Alternative Education Accountability Registration Criteria History

- e) The AEC must offer nontraditional methods of instructional delivery designed to meet the needs of the students served on the campus;
- f) The AEC must have an appropriately certified, full-time administrator whose primary duty is the administration of the AEC;
- g) The AEC must have appropriately certified teachers assigned in all areas including special education, bilingual education, and/or English as a second language (ESL) to serve students eligible for such services;
- h) The AEC must provide each student the opportunity to attend a 7-hour school day;
- i) If the campus serves special education students, the students must be placed at the AEC by their admission, review, and dismissal (ARD) committee; and
- j) Special education students must receive all services outlined in their current individualized education programs (IEPs). Limited English proficient (LEP) students must receive all services outlined by the language proficiency assessment committee (LPAC). Special education and LEP students must be served by appropriately certified teachers.

Rationale: Registration criteria were carried forward from the previous AEA procedures that restricted use of AEA procedures to campuses that offered nontraditional instructional programs and/or settings rather than programs within a regular campus.

At-risk Registration Criterion. An additional at-risk registration criterion was phased in beginning in 2006. Each AEC must have had a minimum percentage of at-risk students enrolled on the AEC verified through current year PEIMS fall enrollment data in order to be evaluated under AEA procedures. The at-risk criterion began at 65 percent in 2006 and increased by five percentage points each year until it reached 75 percent in 2008 where it was expected to remain as described below.

2005 – criterion not applied

2006 – 65 percent or higher at-risk student enrollment at the AEC

2007 – 70 percent or higher at-risk student enrollment at the AEC

2008 – 75 percent or higher at-risk student enrollment at the AEC

A safeguard was incorporated for those campuses that fall below the at-risk requirement such as averaging the rate over multiple years.

Rationale: Implementation of an additional at-risk registration criterion recognized that by definition AECs are designed to serve students at risk of dropping out of school, restricted use of AEA procedures to AECs that were dedicated to serving at-risk students, and enhanced at-risk data quality.

As shown in the table below, 48 percent of students in campuses to be rated under 2006 standard accountability procedures were identified as being at risk in 2005–06 compared to 84 percent of students in registered AECs. Students in residential facilities were by definition considered at risk, although residential facilities reported only 94 percent of their students as being at risk in 2005–06.

# Alternative Education Accountability Registration Criteria History

## At-risk Students in Fall 2005–06

	All Campuses in 2006	Campuses Rated Under 2006 Standard Acct Procedures	Registered AECs Rated Under 2006 AEA Procedures	AECs of Choice	Residential Facilities
<b>Number of Campuses</b>	7,956	7,522	434	352	82
<b>percent At-risk</b>	49%	48%	84%	83%	94%

Source: PEIMS Fall Enrollment 2005–06.

The 2002 Report on the Alternative Education Accountability Pilot stated that principals were asked in a survey what they believe is the appropriate percentage of “primarily” at-risk students. Their responses ranged from 50 percent to 80 percent as appropriate percentages.

### TEC §29.081 At-Risk Definition

For purposes of this section, "student at risk of dropping out of school" includes each student who is under 26 years of age and who:

- (1) was not advanced from one grade level to the next for one or more school years;
- (2) if the student is in grade 7, 8, 9, 10, 11, or 12, did not maintain an average equivalent to 70 on a scale of 100 in two or more subjects in the foundation curriculum during a semester in the preceding or current school year or is not maintaining such an average in two or more subjects in the foundation curriculum in the current semester;
- (3) did not perform satisfactorily on an assessment instrument administered to the student under Subchapter B, Chapter 39, and who has not in the previous or current school year subsequently performed on that instrument or another appropriate instrument at a level equal to at least 110 percent of the level of satisfactory performance on that instrument;
- (4) if the student is in prekindergarten, kindergarten, or grade 1, 2, or 3, did not perform satisfactorily on a readiness test or assessment instrument administered during the current school year;
- (5) is pregnant or is a parent;
- (6) has been placed in an alternative education program in accordance with Section 37.006 during the preceding or current school year;
- (7) has been expelled in accordance with Section 37.007 during the preceding or current school year;
- (8) is currently on parole, probation, deferred prosecution, or other conditional release;
- (9) was previously reported through the Public Education Information Management System (PEIMS) to have dropped out of school;
- (10) is a student of limited English proficiency, as defined by Section 29.052;
- (11) is in the custody or care of the Department of Family and Protective Services or has, during the current school year, been referred to the department by a school official, officer of the juvenile court, or law enforcement official;
- (12) is homeless, as defined by 42 U.S.C. Section 11302, and its subsequent amendments;



## **Alternative Education Accountability Registration Criteria History**

(13) resided in the preceding school year or resides in the current school year in a residential placement facility in the district, including a detention facility, substance abuse treatment facility, emergency shelter, psychiatric hospital, halfway house, cottage home operation, specialized child-care home, or general residential operation; or

(14) has been incarcerated or has a parent or guardian who has been incarcerated, within the lifetime of the student, in a penal institution as defined by Section 1.07, Penal Code.



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PUBLIC POLICY  
INSTITUTE OF CALIFORNIA

MAY 2016

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# Accountability for California's Alternative Schools



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# Introduction

Accountability programs define what policymakers expect of our schools. As we discussed in our 2014 report, *Designing California’s Next School Accountability Program*, the foundation of any accountability programs is the program goals—what the state seeks to accomplish and for which groups of students. Goals are then translated into measureable outcomes, which define expected progress for schools and districts. Once these core elements of accountability programs are fleshed out, the state can assist struggling schools to improve.

California is now in the midst of revamping its school accountability program. In 2015, the State Board of Education signaled its intent to retire the API. It will base future school and district accountability on a range of indicators that are part of Local Control and Accountability Plans (LCAPs).<sup>1</sup> The board has not yet indicated whether separate performance measures will be developed for alternative schools or whether they will be evaluated with the same indicators as all “regular” schools.

The state’s first school accountability program recognized that alternative schools are different from other schools. The Public School Accountability Act was established in 1999 and had two distinct parts. One part established the Academic Performance Index (API)—the accountability measure that applied to all schools. The act also created the Alternative School Accountability Model (ASAM), which applied only to alternative schools. The ASAM was never fully implemented, but it was a vehicle for collecting new performance data on alternative schools.

In California, “alternative school” refers to seven types of schools and programs that provide different educational settings for students who are behind in school, are pregnant or parenting, exhibit behavior problems, or need an alternative schedule to accommodate outside work. These schools are known by various names, including continuation, community, and opportunity schools and enroll mostly students in grades 9 through 12. District and high school administrators define the roles of alternative schools, and the extent to which students are encouraged to attend them. In turn, regular schools depend on alternative schools to help students address academic and behavior problems.

This report examines accountability programs for alternative schools that serve high school students. It begins by describing the state’s system of alternative schools, and the role they play in our K–12 system. Next, we highlight the problems that arise by creating a separate accountability program for alternative schools. We then briefly review the state’s experience with ASAM and how other states address the issue of alternative schools. We conclude with suggestions about how the state should address accountability for alternative schools.

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<sup>1</sup> Please see [Technical Appendix A](#) for more detail on the indicators that are part of LCAP.

# The Seven Types of Alternative Schools

In this report, we use the label “alternative schools” to indicate schools that provide an alternate setting for students who are “at risk” due to inappropriate behavior or academic challenges.<sup>2</sup> There is no statewide *system* of alternative schools, but rather a collection of schools reflecting local decisions about how best to address student needs. Some districts create several alternative schools and encourage at-risk high school students to take advantage of the different instructional approaches. Other districts operate very limited alternative programs, preferring instead to send students to county office administered schools. Finally, in several counties, independent charter alternative schools enroll a large number of high school juniors and seniors each year.

At the elementary and middle school levels, alternative schools largely address student behavior problems. Most provide relatively short-term services, after which students return to their home school. In high school, alternative schools deal with a mix of behavior and academic issues. Some alternative school students complete their education at the alternative; others return to their home high school.

California’s alternative schools have evolved over the years. At one time or another, most alternative school models included supplemental funding for districts. Today, that additional funding has mostly disappeared. Only two types of county office of education alternative schools receive extra state funding. Districts also maintain great control over the design of alternative schools—grade levels served, how instruction is delivered, types of students targeted—and, over time, some types have changed so much that it is difficult to generalize how they operate.

Table 1 displays basic program information on the seven types of alternative schools. As the table indicates, there were 974 alternative schools in 2013–14, enrolling 136,587 students as of October 2013. This represents 9.3 percent of all schools in California and 2.2 percent of all students. Although alternative schools account for a small share of total enrollment, they enroll a much larger share of high school students than those in earlier grades.

Continuation schools account for roughly half the state’s alternative schools and about the same proportion of fall enrollments in alternative schools. State law requires all unified and high school districts to maintain a continuation school (or be able to refer students to a continuation school in a nearby district). These schools have a broad mandate, serving students in grades 10–12 who are at risk of not graduating from high school.

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<sup>2</sup> The California Department of Education uses the label “alternative schools” much more broadly to include any school that offers a different means of meeting student needs and is open to students volunteering to attend the school.

**TABLE 1**

Alternative schools, number and enrollment, 2013–14

School type	Number of schools	Fall enrollment	Target population	Administrative entity
Continuation	468	62,830	Students ages 16 or older who are at risk of not graduating	Districts
Independent Charter	61	28,931	Students who have been expelled, suspended, truant, are pregnant or parenting, or who have dropped out of school	Independent
Community	68	15,202	Expelled students, students with behavior or attendance problems or who are on probation or parole	County offices of education
School of choice	38	13,283	Students who have been expelled, suspended, truant, are pregnant or parenting, or who have dropped out of school	Districts or county offices of education
Community day	234	7,353	Students who have been expelled or have behavior or attendance problems	Districts or county offices of education
Juvenile court	76	6,776	Students who are incarcerated in local juvenile detention facilities	Districts or county offices of education
Opportunity	29	2,212	Short-term intervention for students with attendance, behavior, or academic problems	Districts or county offices of education
Total	974	136,587		

SOURCES: California Department of Education, California Education Code.

District and independent charter “schools of choice” are also considered alternative when at least 70 percent of enrolled students meet specific criteria—such as expelled, suspended or dropped out of school, living with a foster family, or habitually truant. In 2013–14, 99 such schools reported fall enrollment of 42,214 students (29% of all alternative school students).

Community schools, opportunity schools, and community day schools are designed to help students with more significant behavior or attendance problems or who are referred by the county juvenile justice system. In the fall of 2013, 24,767 students (19% of all alternative school students) were enrolled in these three types of schools.

A small number of alternative schools serve incarcerated students. County offices of education operate juvenile court schools, which educate students held in county juvenile hall. Fall 2013 enrollment in the 76 juvenile court schools totaled 6,776 (5% of all alternative students). In addition, 494 school-aged youth attended schools in state youth prisons (not shown in Table 1).<sup>3</sup>

The existence of seven types of alternative schools creates a network of schools difficult to fully comprehend. There is no hierarchy or order of programs—each program operates mostly independently of the others. In addition, state law gives educators great latitude in determining the roles of continuation and community schools. Continuation schools may enroll students with academic or behavioral problems. Community schools may serve almost any student with the approval of the parents. This rather loose structure results in a system that is largely the product of local priorities. This complexity requires its own set of measures if we are to accurately assess student success.

<sup>3</sup> *Next Steps for Improving State Accountability for Alternative Schools*, 2015. Legislative Analyst’s Office. Sacramento, California. (February).

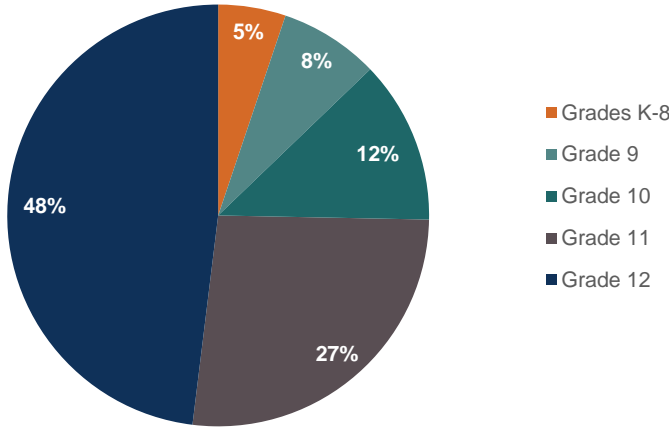
# Alternative Schools Require Specialized Metrics

As Table 1 illustrates, alternative schools are intended to help students address academic or behavioral problems. But standard school outcome indicators do not measure their performance very well. Alternative schools frequently work with students for only a few months, and many more students enroll during the course of the year than fall numbers indicate. As a result, typical measures of student progress, like annual growth on state test scores or four-year graduation rates, may not adequately gauge how well alternative schools meet their objectives. In addition, many alternative schools are too small for annual data to reflect real differences in student achievement year to year. For these and other reasons outlined below, good information on alternative school performance is hard to find. Accurate understanding requires outcome measures better suited to their mission and operation.

## Alternative schools serve mostly high school seniors

In 2013–14, 95 percent of all alternative school students were enrolled in high school and, of those, most were juniors or seniors.<sup>4</sup> Seniors accounted for 48 percent of all alternative school students. That translates into 13 percent of all high school seniors. Elementary and middle grades students represented only 5 percent of alternative school enrollment. However, enrollment is measured in the fall, but students arrive at alternative schools all through the school year. Therefore, these data underestimate the proportion of students who attend an alternative school at some point during the school year. Figure 1 displays alternative school enrollment by grade in 2013–14.

**FIGURE 1**  
Most alternative school students are juniors and seniors



SOURCE: California Department of Education  
NOTE: 2013–14 enrollment data for alternative schools.

<sup>4</sup> Enrollment data are based on the number of students registered as attending a school on a specific day in October.

## Alternative school students are highly mobile

The average student attends an alternative school for less than half a school year.<sup>5</sup> As we mentioned above, this results in many more students attending alternative schools each year than enrollment figures suggest. For instance, in 2013–14 total enrollment over the course of the year was 290,000 students—more than double the fall enrollment numbers.<sup>6</sup> This student mobility affects the interpretation of some school outcome measures. Under the API, for instance, CDE did not count the scores of students who did not attend the full school year. In addition, it does not calculate four-year graduation rates for alternative schools, as only a small percentage of students are expected to attend them for more than one year. But CDE does not make similar adjustments for other indicators, such as suspension and expulsion data, even though some alternative schools are designed to serve students with serious behavior problems.

## Small school size plus student mobility reduces the availability of meaningful annual indicators

The median enrollment at alternative schools is less than 100.<sup>7</sup> In contrast, the average high school enrolls about 1,300 students. Small schools present a special challenge for accountability programs. Charting school performance over time requires that average student outcomes reflect what students can actually do. But when the number of students at a school is very small, average annual data can fluctuate significantly because of random factors. For example, take a school with two students, one high performing and the other low performing. If one student is sick on testing day, the school score would rise or fall dramatically, and the change from the previous year's score would not reflect any real difference in actual proficiency of the two students.

To address the need for reliability, CDE issued annual school accountability scores (API scores) only to schools with at least 11 test scores. But because of the typical alternative school's small size, plus the mobility of their students, many did not receive an API.<sup>8</sup> A study of continuation schools, for instance, found that only three-quarters of the schools received an API in any one year, and only half of all alternative schools received an API in three consecutive years.<sup>9</sup>

## Alternative and regular school outcomes may not be comparable

Students generally transfer to an alternative school because of an academic or behavior problem that regular schools cannot address. As a consequence, standard school indicators make alternative schools look very low performing. In 2013, for example, alternative high schools earned an average API of 560, which was far below the average non-alternative high school API of 741.<sup>10</sup> But this difference largely reflects the fact that alternative schools generally serve students who are not finding success in their regular high schools. Suspension and

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<sup>5</sup> Legislative Analyst's Office, 2015. This is based on data from one school year. Because some students continue attending an alternative school from one school year to the next, this estimate understates the average length of alternative school attendance. Unfortunately, better data are not available.

<sup>6</sup> Legislative Analyst's Office, 2015, and California Department of Education.

<sup>7</sup> Legislative Analyst's Office, 2015. Excludes district schools of choice and independent charter alternative schools. Compared to the typical high school, these schools are also much smaller (the median enrollment of district schools of choice is 148; the charter alternative school median is 304).

<sup>8</sup> Students who change schools during the school year are not included in the calculation of a school Academic Performance Index.

<sup>9</sup> Jorge Ruiz de Velasco and Milbrey McLaughlin. 2012. "Raising the Bar, Building Capacity: Driving Improvement in California's Continuation high Schools." The California Alternative Education Research Project, Chief Justice Earl Warren Institute on Law & Social Policy, University of California, Berkeley and John W. Gardner Center for Youth and Their Communities, Stanford University. p. 14.

<sup>10</sup> Average 2013 API scores for 821 alternative high schools and 1,525 other high schools.



expulsion rates for alternative schools may also differ for those that specialize in helping students with significant behavior problems. Clearly, alternative school performance is not strictly comparable to that of regular schools.

## Good information on alternative school performance is rare

California law authorizes alternative schools as a way of helping students with behavior or academic problems. These schools serve a significant proportion of high school seniors, most of whom attend for a relatively short time. Although their performance is an important issue, existing K–12 indicators often cannot paint an accurate picture of alternative school success. The state’s system of annual measures either fails to reflect the actual progress made by students attending an alternative school or generates data that is more a reflection of the at-risk student population alternative schools serve than an accurate measure of their progress in school.

The state’s four-year graduation rate is a good example of an important performance indicator that does not work as intended in the alternative school context. Few students attend alternative schools for four years—or even one full school year. Moreover, students may arrive at an alternative school having failed several classes. The state’s methodology for graduation rates makes alternative schools accountable for the academic deficits created while students attended the regular high school. And if they arrive at an alternative school in their senior year, it may be unrealistic to expect them to earn enough credits to graduate by the end of the school year.

These problems reflect the more general issue that CDE has not developed short- or long-term indicators more suited to the way alternative schools operate. As our graduation rate example shows, they have not tailored any existing indicators to measure the performance of these schools more effectively. Additionally, there are no existing short-term indicators that would provide evidence on the progress of students who enroll for less than one year. Since more than half of alternative school students fall into the short-term category, developing data on the value of alternative schools for short-term students is essential.

The lack of outcome measures is only one of the information problems. More broadly, the state simply does not know much about the operation of the different types of alternative programs. As a consequence, it is unable to answer basic questions that would arise in the development of an alternative accountability program, such as: Do the different types of schools need different indicators of performance? What proportion of alternative school students return to their home high school? How many students attend more than one alternative school, and how should accountability be assigned in that situation? In any case, devising metrics that accommodate these complexities would go a long way toward helping the state understand alternative schools and put policies in place that promote student success.

# Why Separate Accountability Is Not Sufficient

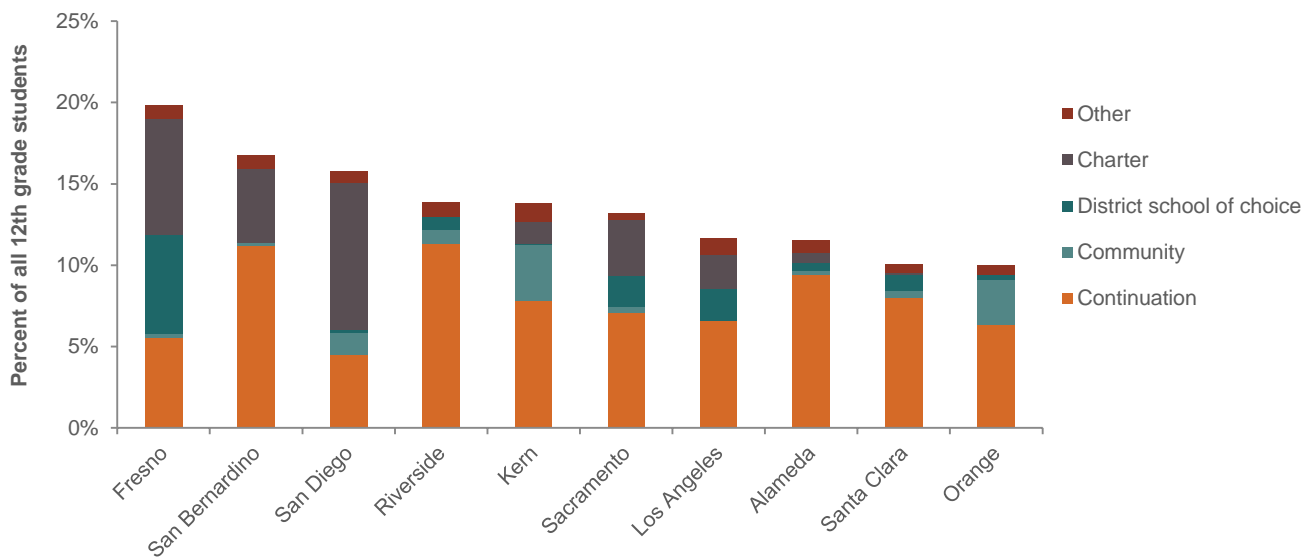
Clearly, K–12 accountability programs need to recognize the critical role alternative schools play. However, a separate accountability program for those schools solves some problems but creates others. Alternative schools reflect local policies about the need for educational options targeted at struggling students. They function as a *complement* to regular schools, helping students administrators have determined are not finding success or have been expelled. The fact that students attend alternative schools for an average of four months supports this perspective. Therefore, policymakers need to consider regular and alternative schools as one system in order to create consistent statewide outcome data for regular schools and to create stronger incentives for meeting the needs of at-risk students. This can be accomplished by holding regular schools accountable for students’ performance while they attend alternative schools. Alternative schools affect regular school performance ratings

## Alternative schools affect regular school performance ratings

The system of alternative programs differs significantly in size and design depending on local policies, and these differences affect the meaning of school outcomes for both alternative schools and regular schools. Figure 2 displays the proportion of 12th grade students enrolled in alternative schools in the 10 largest California counties. This includes all students enrolled at a district, charter, or county office alternative school in the fall of 2013.

The figure illustrates several important facts. First, the proportion of seniors served by alternative schools varies significantly from county to county. For example, almost 20 percent of all high school seniors in Fresno County were enrolled in an alternative school. In Santa Clara and Orange counties, about 10 percent of seniors attend an alternative—half the proportion in Fresno.

**FIGURE 2**  
Alternative school enrollment and types vary widely across counties



SOURCE: California Department of Education.

NOTE: Twelfth grade enrollment in alternative schools, 10 largest California counties, 2013–14. 12th grade enrollments contain an unknown number of “fifth-year seniors”—students who take more than four years to complete high school.

Second, the type of alternative school that enrolls significant numbers of students differs by county. In Fresno, alternative charter schools enroll the largest number of seniors, followed by district schools of choice and continuation schools. Charter schools also play a major role in San Bernardino, San Diego, and Sacramento counties. Riverside and Santa Clara alternative school students mostly attend continuation schools. In Kern and Orange counties, community schools serve a significant proportion of students.

These data have two important implications for accountability programs. First, when large proportions of students attend alternative school, it affects regular high schools' performance data. For instance, when calculating graduation rates, CDE assigns students to the last school they attended prior to the end of 12th grade. As a result, 12 percent of high school seniors who finished 12<sup>th</sup> grade at an alternative school were not counted in a school graduation rate in 2013–14. Although CDE does not publish alternative school graduation rates, we estimate that 37 percent graduated. If these students had been assigned to their home school, regular high school graduation rates would average 81 percent, down 6 percentage points from the 87 percent we calculated using CDE's methodology.

Second, in some areas, significant proportions of students leave their home schools and districts to enroll in a school administered by charter operator or county office of education. CDE rules dictate that when this occurs, the students' home school and district are no longer accountable for those students and the charter or county office school becomes the school of record. As a result, districts are off the hook for students who cross these important governance lines—between districts, charter schools, and county offices of education—making accountability even more difficult.

## The misidentification of alternative schools

The state has permitted significant local flexibility over the design of alternative schools. Districts appear to exploit that flexibility to the point that it raises questions about what the label "alternative" means. Only charter and district "schools of choice" and community day schools are required to show that their students qualify as "at-risk." The other types of alternatives are not held to the same standard. As a result, the state risks including in its alternative accountability program schools that are not serving at-risk students.

This loose regulatory framework creates confusion about why some schools are considered alternative and other very similar schools are not. It also raises questions about the range of services the state expects from alternative high schools. Our review, for instance, found the following examples (more details on these findings can be found in [Technical Appendix B](#)):

- **Alternative schools that appear to serve a relatively advantaged student population.** State law assumes that most types of alternative schools are serving at-risk students. We found alternative schools where turnover was low and students were achieving at high levels. These data raise questions about whether such schools are actually "alternative" and should, instead, be included in the regular school accountability program.
- **Regular schools that have all the characteristics of alternative schools but are not designated as such by the state.** We found a number of these schools during our research. They are characterized by very small 9th and 10th grade enrollment compared to that of 11th and 12th graders, high mobility rates, and low graduation rates. Several had been identified as alternative in past years, but were no longer designated as such. It is not clear why these schools have not asked to be considered alternative.

These findings suggest the state does not have a concise list of which schools actually operate as alternatives. Because districts currently assign the designation, the state will need to develop other ways to determine which schools should receive the alternative label. For example, the state could identify alternative schools based on the characteristics of students they enroll (at risk of dropping out or behavior issues) and the short-term nature of student enrollment. In any case, it is clear that standardizing the definition of alternative school for the purposes of data collection and accountability is an important step.

## Lessons Learned from Other Models

A separate accountability program for alternative schools is not a new idea. California operated the Alternative School Accountability Model (ASAM) for many years. In ASAM, the state tried hard to design a measurement system that could accommodate the many different types of alternative schools. Unfortunately, the model had several flaws that undercut its effectiveness. Other states also use different measures or standards for alternative schools than for regular schools. However, hard data on the effectiveness of these measures are not readily available. So these state models yield few answers to the central question of how best to provide accountability for services to alternative school students. Even so, we can benefit from examining their strengths and weaknesses.

### California’s ASAM

The ASAM was created in 1999 as a supplement to the API. It was designed to accommodate many different types and objectives of alternative schools. To do that, it asked each school to choose three of 14 different measures.<sup>11</sup> A school’s outcomes were compared to data from other schools choosing the same indicators. The system rated schools using four performance levels.

Table 2 displays the 2009 ASAM indicators. They generally cover four areas of student performance: behavior, attendance, achievement, and completion. Student behavior is measured by incidents of poor behavior during school or by tardiness. Attendance measures include coming to school each day and persisting in attending over the course of the year. Completion metrics include graduation or passing of all or part of equivalence examinations. Attainment indicators were designed for specific grade levels. Promotion to the next grade, for instance, was available to only K–6 schools. Course completion was limited to middle schools, and credit completion was intended for high schools.

**TABLE 2**

Alternative school accountability model indicators, 2009

Behavior	Attendance	Attainment	Achievement	Completion
Profanity or disruptive behavior	Attendance *	Promotion to next grade (K–6)	Reading achievement	High school graduation rate *
Suspension *	Attending plus completing all assignments	Course completion (Middle school)	Writing achievement	GED completion rate
Student punctuality	Sustained attendance	Credit completion	Math achievement	Average GED sections completed
				State CHSPE passed

SOURCES: California Department of Education, Alternative Schools Accountability Model Indicators, Restrictions, and Conditions. Revised December 28, 2008.

NOTES: \* denotes an indicator that is one of the 22 LCAP indicators. GED = General Educational Development test. CHSPE = California High School Proficiency Examination.

<sup>11</sup> The number of measures that schools could choose from varied somewhat over time, as measures were added or removed from the list.

The ASAM indicators also required schools to collect student data that could be measured in increments smaller than a year. For instance, behavior and attendance can be measured monthly, quarterly, or annually. Gains in reading, writing, and mathematics can also be measured periodically during the school year. Attainment and completion, on the other hand, represent milestones that indicate progress in school. Attainment shows that students fulfilled the requirements needed to pass a course or move on to the next grade. Completion data suggest that students have gained the skills and knowledge needed to earn a high school diploma or other certificate.

Unfortunately, the ASAM data were never used for accountability purposes. When the federal No Child Left Behind (NCLB) Act passed in 2002, it did not allow ASAM data to be included in school scores. The state ended the ASAM in 2010, when funding for data collection was eliminated from the budget. By that time, though, the system's effectiveness was being questioned, and CDE and the state board were contemplating redesigning it to provide a better gauge of school performance.

## **ASAM had strengths and weaknesses**

ASAM recognized that holding alternative schools to account required the state to develop different performance measures than those used to evaluate regular schools. Asking schools to choose from among 13 possible indicators was intended to ensure that performance data accurately measured a school's most important outcomes. But tailoring the system for maximum flexibility had a price.

**Data only for "long-term" students.** ASAM developed performance indicators that could be measured at various times during the school year. But the system collected data only on students who stayed enrolled for at least 90 days (or half a school year)—under ASAM, they were considered "long-term." The rationale for this rule was to give students a period to adjust to their new school. But the limitation excluded perhaps half of alternative school students from the data—some schools reported no students meeting the 90-day threshold.<sup>12</sup> Worse, this policy implicitly assumed that alternative schools were not responsible for students who attend for less than half a year.

**No common performance data.** ASAM allowed each alternative school to choose the measures that best reflected its performance. As a result, however, ASAM lacked a core of comparable data. Similar schools could be held accountable for very different outcomes. In addition, schools were not required to select an academic measure. For instance, continuation schools opted for credit completion as the most common indicator (about 83% of schools chose it) and attendance was second (67% selected it). Only 36 percent of continuation schools chose high school graduation, and only 29 percent tested students to measure academic gains.<sup>13</sup>

**Tests of academic achievement did not work as planned.** ASAM experimented using commercial tests to obtain short-term data on student gains in reading, writing, and mathematics. Unfortunately, an analysis of data from the commercial tests showed that they did not work as hoped—as many students made significant losses on the post-test as made gains. Since it was unlikely that students actually forgot more than they learned while in school, this finding raised the question of whether students were motivated to do well on the tests or whether other factors affected the validity of these scores.<sup>14</sup>

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<sup>12</sup> Legislative Analyst's Office. 2007. *Improving Alternative Education in California*. Sacramento, California.

<sup>13</sup> PPIC analysis of ASAM data from 2004–05.

<sup>14</sup> WestEd. 2009. *ASAM School Performance: Alternative School Performance on ASAM Accountability Indicators, 2002–03 to 2007–08*. The tests were given to students periodically in an attempt measure gains in mathematics or English over time.

## California’s current approach has had limited impact

Starting in 2011, California began returning alternative school test scores to regular schools as part of the API calculations. The policy was designed to strengthen the incentive for school administrators to ensure that the needs of at-risk students are being addressed most effectively—whether at the regular or the alternative school. This policy would also improve the comparability of data for regular schools, as it would be less affected by local alternative school practices.

Unfortunately, as implemented the policy probably has had only a minimal impact. The state began returning test scores of some alternative school students to their home school in 2011 when calculating the API and federal performance scores. The department reports that in 2012–13 the scores of 8,460 alternative school students were included in their regular school’s data.<sup>15</sup> This number comprises only about 5.5 percent of alternative school students in grades 3 through 11. Since almost 300,000 students attended an alternative school that year, this policy probably had a very limited impact on regular school accountability.

We were unable to obtain data to determine why the scores of so few students were affected by this policy. But there are several reasons why the number would be relatively small. First, half of alternative school students are high school seniors, and the state’s testing program did not extend to the 12th grade.<sup>16</sup> In addition, scores were returned only for students “referred” by school or district officials. However, the term “referred” was not defined, leaving significant local discretion over determining which student scores would be returned to the regular schools. The law also excludes several groups of alternative school students from the requirement. Scores were not returned to the students’ school when students were expelled or referred to the alternative school by a correctional or judicial officer. Regulations also exclude students who dropped out of school for more than 30 days.

This issue requires additional analysis to determine why so few student scores were affected by the policy. To be effective, the state should keep any exclusions very narrow so that regular schools would remain accountable for the performance of most alternative school students. In addition, the state should not limit this policy only to students who are referred by administrators. By treating high schools and alternative schools as complementary parts of one process, the state’s accountability program would encourage districts to worry less about which school is accountable and focus more on placing students where they can be most successful.

## Alternative school accountability in other states

Other states besides California recognize the need to hold alternative schools accountable based on different measures or standards. States use one of two general models to accomplish this. Some—such as Kentucky, Florida, and Michigan—simply include alternative school student data in the accountability scores of the students’ home school. Others—such as Texas and Colorado—create alternative accountability programs that employ many of the same indicators as their regular program. Florida does both—although it bases its alternative school rating solely on the growth of student test scores, whereas its regular accountability measure uses a wider array of indicators.

We contacted staff from the education departments in Texas and Colorado to see whether they had information on how well their performance indicators work to measure the success of alternative schools. Texas uses the same measures for all schools, but set lower standards for alternative schools in recognition of the at-risk nature of the

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<sup>15</sup> Randy Bonnell, California Department of Education, private communication December 2, 2015. The 8,460 students comprises about 5.5% of students in grades 3 through 11 who attended an alternative school in 2012–13.

<sup>16</sup> While 12th graders are not tested in the state’s new assessment program, these students would be included in other school performance data, including graduation, attendance, suspension and expulsion, and indicators of career and college preparation.

alternative school population.<sup>17</sup> Colorado also lowers its standards for alternative schools but tailors its indicators for better performance measurement. Colorado also give students up to eight years to graduate (compared to four in California), and passing the General Educational Development (GED) test counts towards alternative school graduation.<sup>18</sup> Schools may also submit local data—including supplemental test data—when state indicators do not accurately measure a school’s performance.

Unfortunately, neither state had formally investigated the effectiveness of their approach to alternative schools. We also asked about the relationship between the alternative accountability program and the accountability program for regular schools. While both indicated that their educators generally support the alternative accountability programs, questions remain about whether home schools should retain some accountability for alternative school students.<sup>19</sup> Finally, both states closely regulate the types of schools that are eligible for the alternative accountability programs. Texas requires that at least 75 percent of students meet one of several definitions of being “at risk.”<sup>20</sup> Colorado requires that 95 percent of a school’s students meet its at-risk definition.<sup>21</sup> These rules help reassure policymakers that the lower standards in alternative school accountability is warranted by the population served by these schools.

Even though we learned a lot about how these other states approach alternative school accountability programs, we were not able to get enough information to evaluate how effective their solutions have been. But it is not clear how useful that information would be as alternative schools in other states may operate differently than California’s. For example, students in Colorado’s alternatives are enrolled for much longer than four months.<sup>22</sup> Thus, differences in the state K–12 systems compound the lack of data about what works. In the next section, we will propose some ways our state might improve on past efforts.

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<sup>17</sup> 2015 *Accountability Manual for Texas Public School Districts and Campuses: AEA Provisions*. Texas Education Agency, Department of Assessment and Accountability, Division of Performance Reporting. Accessed at <http://ritter.tea.state.tx.us/perfreport/account/2015/manual/manual.pdf>.

<sup>18</sup> Colorado Department of Education. 2013. *Accountability for Alternative Education Campuses and AEC SPF Changes for 2013–14, CASE Summer Conference*.

<sup>19</sup> Phone conversation with Jessica Knevals of the Colorado Department of Education (December 7, 2015) and Esteban Reyes of the Texas Education Agency (December 5, 2015).

<sup>20</sup> Texas Education Agency. 2015. *Accountability Manual for Texas Public School Districts and Campuses: AEA Provisions*. Texas Education Agency, Department of Assessment and Accountability, Division of Performance Reporting.

<sup>21</sup> Colorado Department of Education, 2013.

<sup>22</sup> Jessica Knevals, Colorado Department of Education, December 7, 2015, phone call.



# A Roadmap for Alternative School Accountability

Our review of alternative school accountability points to three conclusions. First, California should develop a program for alternative schools that parallels its main program but employs more accurate and useful performance indicators. Second, performance data for regular schools need to include data on students who attend alternative schools so that regular schools have a stake in their success. Third, the state needs to strengthen its system of alternative schools and learn more about the experience of alternative school students. Below, we discuss these suggestions in more detail.

## Hold both regular and alternative schools accountable

States use two general models to address the accountability challenges associated with alternative schools. The first returns alternative school student data to their home school. This option strengthens the incentive for school administrators to meet the needs of at-risk students effectively no matter where they are served—at regular or alternative schools. It also ensures all students are part of a school accountability rating. It addresses the problem with alternative schools’ small size and the temporary nature of their students, which made the API ineffective as a measure for these schools. Finally, it undercuts incentives for regular schools to use alternative schools as a way to improve performance data, such as graduation rates.

The second model is a separate program of accountability for alternative schools, often using measures from the regular system. The goal is to develop better indicators or set lower standards for the success of these schools compared to regular schools. An alternative accountability program also raises the visibility of these important schools and provides feedback to them regarding their strengths and weaknesses. Since alternative schools serve a significant proportion of high school students in many areas, data on their effectiveness is critical information for educators, parents, and the local community.

We think both of these options should be pursued in California. Doing so acknowledges the complex relationship between regular and alternative schools. In most cases, alternative school students spend the majority of their high school years at a regular high school. They transfer to an alternative school in their junior or senior years, and attend for only four months on average. It seems evident that making alternative schools entirely accountable for these students places too much responsibility on them and too little on the regular high schools. Moreover, current policy holds neither regular schools nor alternative schools accountable when alternative school students drop out. We think it makes more sense to hold the regular schools accountable and treat alternative schools as a complement to regular schools.

## Return alternative school student data to regular schools

The impact of returning alternative school student data to students’ home high schools will depend on several factors. First, the state needs to investigate why so few scores were returned to regular schools under the previous API policy, and establish rules that ensure most data is returned. Second, the state should return the data for all the performance indicators used in the accountability scheme for regular schools. This will ensure that data for 12th grade alternative school students is included in regular school data. It would also strengthen the incentives to ensure that alternative schools pay attention to career and college preparation.

However, returning alternative school student data to regular schools is not a policy panacea. In fact, it will have a limited impact in some areas. Our analysis shows that fewer than 5 percent of students in some districts attend an alternative at the end of 12th grade, so the effect on regular school performance data in these districts will be small.



For this reason, even in districts with small proportions of students attending alternative schools, it is important to hold both alternative and regular schools accountable for the same students.

We also have questions about this policy require that further analysis with student-level data before they can be addressed. For instance, should regular schools be held accountable for their students no matter how many alternative schools a student attends? What about a student who only briefly attended the home school, opting instead for an alternative school? A better understanding of the dynamics of student enrollment would allow CDE and the state board to address these issues in a thoughtful manner.

## Establish alternative school accountability

The alternative accountability system should use indicators that parallel the state’s regular school accountability program whenever possible. The similarities between LCAP indicators and those used in ASAM means that measures in a new program will be familiar to local educators. Thus, one question is whether the LCAP indicators will work for alternative schools. In addition, other indicators may be needed to understand alternative schools’ performance.

Table 3 lists the performance indicators that have been proposed in California since 2009 to replace ASAM. The California Department of Education commissioned the 2009 WestEd report to provide guidance about the ASAM Phase II design. WestEd’s proposal grouped eight indicators into three areas of performance: engagement, achievement, and completion/transition. Five of the Phase II measures come from ASAM, but there are three new ones, including 30-day achievement gains, passing the high school exit examination, and re-enrollment in a regular school or another alternative school.

The second model was introduced in legislation in 2014 as the Student Achievement Via Excellence (SAVE) accountability program. Most of its indicators were used in ASAM. In addition, SAVE requires students to attend for at least 90 days before they are counted in a school’s performance data. SAVE also borrows from the Phase II proposal the idea that reenrolling in a regular school represents a successful exit from an alternative school.

**TABLE 3**  
Post-ASAM Alternative School Accountability Proposals

	Engagement	Achievement	Completion/ transition	College/career
ASAM Phase II, WestEd (2009)	Attendance, 30-day achievement gains	Annual state tests, high school exit examination, 90-day achievement gains	Persistence, graduation, re-enrollment in a regular school or other alternative	None
Student Achievement Via Excellence (2014)	Suspension or expulsion, punctuality, attendance, persistence	Annual state tests, grade promotion, course or credit completion	Graduation, GED completion, re-enrollment in a regular school	None
County superintendents of school (2015)	Attendance, suspension, or expulsion	Credit completion, short-term achievement gains	Graduation, GED completion, re-enrollment in a regular school	College or university preparation, career certificate

SOURCES: Assembly Bill 1573 (Sawyer-Jones), 2013–14 legislative session; Detailed Proposal for ASAM Phase II, WestEd, April 2009; California County Superintendents of Education Services Agency.

NOTES: ASAM = Alternative School Accountability Model; GED = General Educational Development test. The county superintendents’ proposal would base school accountability ratings on the behavior, achievement and completion/transition indicators. Schools could earn “bonus points” when students succeed on college and career indicators. The proposal includes a number of potential indicators in this area.

The third model was crafted by a committee of the California County Superintendents' Educational Services Association. It uses a more limited set of indicators than ASAM and the SAVE plan. It relies primarily on annual data, and is the only model that does not include state test scores. Moreover, it is the only one that measures preparation for college or career.<sup>23</sup> The college/career indicators, however, would provide “bonus” points for schools that demonstrate success in this area. A school’s basic accountability score would reflect its performance on the behavior, achievement, and completion/transition indicators.

These three proposals outline an array of possible indicators California could consider using in its alternative school accountability program. The county superintendents’ model has clear parallels to the LCAP, which would align accountability for alternative and regular schools. Nevertheless, all three models suffer from two major drawbacks. First, they rely on annual data, even though the average alternative school students are enrolled for less than half a school year. Second, the data focus solely on outcomes while students are attending the alternative school, and ignore their success after returning to regular schools.

### **Develop better short-term alternative performance indicators**

The annual indicators proposed in these three models are not significantly better than the data CDE currently collects for regular schools. When students attend for an average of less than half a school year, annual data mostly reflects the achievement levels and behavior of students who are sent to alternative schools, and not the schools’ added value. Similarly, state test results do not provide useful information for most alternative schools. Below, we outline modified versions of the core LCAP indicators that would provide more accurate data on alternative schools.

**Graduation and persistence.** Currently, CDE calculates only four-year graduation rates. But many alternative school students arrive as juniors or seniors far behind in credits needed to graduate, making it difficult to graduate in 4 years. CDE could calculate graduation rates for alternative schools based on when students arrived at the school—“junior” and “senior” graduation rates. In addition, alternative schools should be given credit for getting students to attend a fifth and sixth year of high school, and for helping those students graduate. Alternatively, the state could calculate graduation rates for all students who are far behind in earning credits as of the beginning of their junior year. This would allow comparisons of regular and alternative school performance for this at-risk group of students.

**Dropouts.** CDE policies currently delete a dropout from state statistics if the student subsequently reenrolls in any school. While this policy makes sense from an accounting perspective—a student cannot be a dropout if they subsequently re-enroll—it minimizes the importance of the event for students and weakens dropout rates as a measure of a school’s ability to help students stay engaged in school. The state could address this problem by developing two dropout measures: the current one that excludes students if they subsequently reenroll in school, and a second that includes all dropouts from a school (even those who subsequently reenroll in another school).

**Monthly behavior and achievement data.** Annual data for alternative schools often reflect a composite of many students who arrive at different points over the school year. These indicators reflect the extent to which schools are charged with addressing more severe student behavior problems. But instead of annual composites, these schools need data that reveal the progress their students make in achievement, behavior, and attendance. One option is to aggregate data around the amount of time students attend. For instance, the number of credits could be collected for the first month of attendance, the second month of attendance, and so on. This strategy would provide short-term

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<sup>23</sup>The county superintendents of schools proposals would use a number of indicators to measure college and career readiness, such as satisfying California’s “a–g” course requirements, earning skill certificates, and demonstrating readiness for college on the state 11th grade tests. The a–g courses identify the high school courses students must pass in order to be considered for enrollment in the state universities.

data showing the progress students made in earning course credits during their time at alternative schools. Similar monthly data could be developed for attendance, and for school behavior.

### **Measure longer-term student success**

Alternative schools should also be held accountable for students' longer-term success. For most K–10 alternative school students, returning to their home school is the goal. Even alternative schools serving 11th and 12th graders may give students the option to stay and graduate or return to the home school. The three California models recognize the importance of reenrolling in a regular school, but they do not track success after students return to their home school. To students, long-term success is the most important outcome. Focusing only on what happens during the short time they attend an alternative school misses this critical perspective.

Assessing student success after they return to a regular school is also possible using annual state data. Annual data—such as state test scores—are not particularly valuable as a measure of the gains students made during the relatively short time they were enrolled in alternative schools. But academic gains on state tests for the year *after* students return to their home school may represent a useful metric for the performance data system. Similarly, gains in behavior and attendance for that year could represent a useful measure of alternative schools' longer term impact.

### **Begin defining a system of alternative schools**

Establishing alternative school accountability also requires the state to start creating a more coherent organization of alternative schools. Currently, there are seven school types. No overarching rules exist to clarify the kinds of students these programs may serve or what services these schools should make available. Inconsistencies regarding which schools are labeled “alternative” are also relatively common. In addition, the number and types of alternative school options available to students differs significantly by district and county.

As a result, current state policies do not provide a solid foundation for an alternative accountability program. Specifically, schools should be permitted to participate only when students are “at risk” and the average length of enrollment is short. Schools that do not meet these tests should participate in the regular accountability program. Similarly, alternative schools that meet the two criteria should not be permitted to opt out of the alternative accountability program.

The state could look to the existing “schools of choice” criterion for a definition of at-risk student. It currently requires 70 percent of students to meet one of several at-risk categories. High school students far behind in their studies should probably be added as a new at-risk category, as they represent the most common type of alternative school student in the upper grades. Applying this test to alternative schools would help screen out schools that do not serve at-risk students.

## Conclusion

One purpose of school accountability programs is to shine a light on the strengths and weaknesses of our schools. Because of inadequate data, alternative schools have been in the shadows of K–12 policy discussions. Only because of improvements in the state’s student information system can we now see the important role alternative schools play in the lives of California’s high school students. About 12 percent of all seniors finished 12th grade at an alternative school, and only about 37 percent of them graduated. This makes these schools’ performance of an important state issue.

The State Board of Education is about to replace the Academic Performance Index (API) with a range of indicators that are part of Local Control and Accountability Plans (LCAPs). It has not yet revealed whether it will include any special accommodations for alternative schools. We have a perfect opportunity to reconsider how well the accountability program has worked in the past with respect to alternative schools, and what can be done to improve it for this very important student population. California has a critical need to better understand alternative schools. Yet our understanding remains extremely limited, and the state risks making major missteps in developing new policies based on current knowledge.

In this report, we conclude that California’s accountability program must address the issues raised by alternative schools, to ensure that data for both regular and alternative schools accurately reflect the success of students. With better data on alternative schools and insight into the strengths and weaknesses of the past accountability programs, California can develop stronger programs for helping schools address the needs of at-risk students. In a sense, our recommendations return the state to policies it adopted earlier with an alternative accountability program and the policy of returning test scores of alternative school students to their home schools.

But we know more today, which suggests California can go further than previous programs. First, California should hold both alternative and regular schools accountable. It should develop accountability for alternative schools that parallels its main program but employs more accurate and useful performance indicators, based on the complexities of the alternative school experience. These indicators should reflect both short- and long-term achievements.

Second, performance data for regular schools need to include data on almost all students who attend alternative schools so that regular schools have a stake in their success. To ensure that this recommendation is implemented effectively, the state needs to ascertain why so few scores were returned to regular schools under the previous API policy, and to correct that aspect of the implementation.

Third, the state needs to learn more about the experience of alternative school students and to clarify and strengthen its system of alternative schools. Schools should only qualify for “alternative” status when they serve truly at-risk students whose average length of enrollment is relatively short. In addition, high school students far behind in their studies should be added to the state’s at-risk category. These criteria would help screen out schools that do not serve at-risk students.

If our recommendations are adopted, they will go a long way toward providing better data, for both alternative and regular schools. At the local level, this would help schools gauge their strengths and weaknesses, and inform policy makers, parents, and the public about the state’s system of alternative schools, its students, and its outcomes. Finally, better data would support state efforts to improve the quality of alternative schools. Given the size of the at-risk pool of students attending alternative schools, we think such an effort is warranted.

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## ACKNOWLEDGEMENTS

The author would like to acknowledge the time and assistance of Natasha Collins, Diana Walsh-Reuss, and Jorge Ruiz de Velasco. Jacob Jackson provided critical analytical and spiritual help, and Hans Johnson and Lynette Ubois provided helpful commentary and advice. Thanks also to Chansonette Buck for her fine editing of the report.

Research publications reflect the views of the authors and do not necessarily reflect the view of the staff, officers, or Board of Directors of the Public Policy Institute of California. Any errors are my own.



# Federal Graduation Rate



Did the student group meet the 94.0% four-year long-term target?



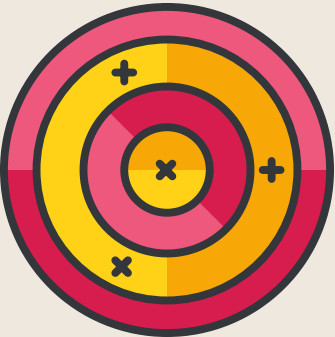
Did the student group meet the 90.0% four-year interim target and make improvement of at least 0.1% over the prior year?



Did the student group meet the four-year growth target?



Did the student group meet the 92.0% six-year interim target?



# Rethinking Accountability for Alternative High Schools

The Problems with Applying Traditional Performance Ratings to Alternative Schools

[Chris Domaleski](#) January 7, 2019

Alternative high schools serve a vital role in improving outcomes for students, particularly for those students who are most at risk.

While there isn't a uniform definition for "alternative," the term typically describes a school that primarily serves students who have not been successful in a traditional environment. Alternative high schools often receive students with cumulative academic deficits and take on the vital work of helping students prepare for opportunities after high school.

## How Effective are Alternative High Schools?

Given the key role of alternative schools, it's essential to ask how effective they are in providing high-quality education to students. One would expect to find the answer by reviewing the state's school accountability ratings. After all, the Every Student Succeeds Act (ESSA) requires states to provide uniform information about school quality and performance for all public schools in the state.

However, there's a problem. Alternative schools almost always wind up in the lowest performance categories of the state system. A low rating for all alternative schools can only be interpreted in one of two ways: all alternative schools in the state are, in fact, performing very poorly; or, the accountability model does not fit these schools very well. I find the latter more persuasive, and, increasingly, state education leaders are reaching the same conclusion.

## The Challenge of Applying Traditional Rating to Alternative High Schools

Why might traditional ratings be ill-suited for alternative high schools?

- ESSA systems heavily weight proficiency on state tests and four-year graduation rates. However, the reason many students attend alternative high schools in the first place is precisely because they've fallen behind academically and are at risk of not graduating on time. It's both unsurprising and uninformative to report low ratings based on these factors.
- Alternative high schools often experience higher rates of student mobility. When students move in and out more frequently, traditional "business rules" for calculating indicators may not fit well, which can create a situation where an indicator with substantial weight is based on a relatively small and/or unrepresentative group.



- Finally, and perhaps most importantly, the indicators used in traditional systems may not be well-aligned to the supports that are most important to incentivize in alternative high schools.

## **The Purposes of Accountability**

The central purpose of any school accountability system should be to help improve educational outcomes for all students. While a full discussion of how to leverage the promise of accountability is beyond the scope of a single blog post, two primary factors are worth highlighting.

First, system design can **incentivize actions that improve opportunities to learn and help students achieve important outcomes**. For example, when an accountability system gives schools credit for helping students earn a diploma in an extended time frame, that credit provides an extra incentive for a school to focus resources on students who continue to work toward graduation after four years. Similarly, when a system rewards participation in courses or programs that prepare students for post-secondary success (e.g. coursework leading to industry certification), students often receive additional chances to develop knowledge and skills critical to post-secondary success.

Second, accountability systems can **provide signals to guide evaluation of policies and initiatives**. For example, leaders and policymakers can use accountability system results to determine whether supplemental educational services are effective, or if a particular approach to professional development seems promising.

## **Rethinking Alternative Accountability**

Given the distinctiveness of alternative schools, it's important to design a system that not only reflects the unique features of alternative schools, but also clarifies the conditions and mechanisms for achieving improved outcomes. This approach is best explicated in a theory of action specified at a level sufficient to produce a series of falsifiable claims. Putting these claims to the test provides information about both the credibility of the theory and the efficacy of the interventions.

Designing effective accountability solutions for alternative high schools is NOT about creating a less rigorous version of the state's existing system. Rather, it involves creating a distinctive system that reflects the outcomes and mechanisms judged to be most effective for these unique schools.

## **Promising Practice: Wyoming**

Wyoming Senate Enrolled Act (SEA) 87 called for revisions to the Wyoming Accountability in Education Act (WAEA) to include the establishment of a separate alternative school accountability system.

State education leaders responded by empaneling an advisory group comprising alternative school leaders along with broad group of experts and advocates. Working with the Center for Assessment, the advisory group developed a framework for the new system, and then conducted a multi-year pilot to evaluate the initial design and inform refinements and improvements to the system. The [new system](#) was finalized in the fall of 2018.

Wyoming's alternative accountability system includes indicators that overlap with the general model, as well distinctive elements. Some overlapping indicators have been adapted to better reflect the priorities identified by the advisory group. For example, the alternative system emphasizes progress toward proficiency using a performance index, and substantially weights academic growth. Distinctive elements include a climate survey and credit for implementing individual Student Success Plans. These latter elements were selected in part to promote an environment characterized by personalized support and mentoring, seen as crucial to helping students reach their post-secondary goals.

The new model helps leaders and stakeholders differentiate between schools that are more or less effective at preparing students for post-secondary success. While some schools still receive feedback that indicates performance is below expectations, the ratings are seen as fairer and more useful to inform improvement planning. And the fact that some schools are recognized as meeting or exceeding expectations provides evidence that while the performance goals may be ambitious, they are attainable.

### **One Size Doesn't Fit All**

There is no one "right way" to design an accountability system. The system must be pegged to the prioritized goals and outcomes, and must take into account the context and characteristics of the schools. What may work well in one context may be poorly suited for another. The Wyoming case provides a great example of a process that included mechanisms to:

1. elicit input from a diverse group of experts and stakeholders
2. develop and document policy priorities
3. pilot and fine-tune the system before fully operationalizing it

Ultimately, both the process and the product are vital. A thoughtful process can help state leaders develop appropriately-customized accountability solutions for alternative schools that make the most of their role in a system that improves outcomes for all students.

One size doesn't fit all. It's time to rethink accountability for alternative schools.

<https://www.nciea.org/blog/assessment-systems/rethinking-accountability-alternative-high-schools>