

## Background:

Congress demonstrated its commitment to making the United States a Graduation Nation when it reauthorized the Elementary and Secondary Education Act in 2015. Statute requires that any high school in the nation with a graduation rate lower than two-thirds,  $\frac{2}{3}$ , be identified for low graduation rate. The United States Department of Education (US DoE) established this statutory mandate in rule by basing identification on a student's traditional cohort status, either fourth or fifth year.

Dr. James Lane, Senior Advisor, Office of the Secretary, Office of Elementary and Secondary Education, United States Department of Education, gave a keynote address at the National Alternative Education Association (NAEA) 2022 conference. During the Q & A at the end of Dr. Lane's address, a conference attendee raised the issue of alternative high schools in his state being identified as CSI-Low Grad Rate. Dr. Lane challenged NAEA to suggest accountability measure(s) that would be more appropriate for alternative high schools, keeping in mind that any measure would apply to all schools.

NAEA has adopted this definition of alternative/non-traditional education:

Alternative education serves students who require or thrive in an environment other than a traditional educational setting. This population of learners may face challenges in school, home, and/or community. Their ability to receive services in a traditional academic setting may increase vulnerability to school failure. Alternative education strives to deliver equitable access to innovative approaches to teaching and learning which provide students the opportunity to meet graduation requirements, prepare for post-secondary experiences and participate as productive members of their communities.

## Issue:

This use of traditional cohort graduation status is a pain point for high school Alternative Education Campuses (AECs) throughout the country. It is illogical that an AEC focused on dropout recovery, over-aged, and/or under-credited students, and other students for whom traditional high schools do not work, should be held accountable to the same standard as traditional high schools, whose typical students follow a normal trajectory through high school. Moreover, holding AEC schools accountable to a standard that the majority of their students have already failed to meet creates strong disincentives for K-12 districts to create and invest resources in re-entry or credit acceleration programs for youth vulnerable to leaving K-12 permanently without earning a high school diploma.

Our proposal below aims to strengthen AEC schools and expand opportunities for over-aged/under-credited youth to have a second chance to graduate high school with a standards-based diploma. We are guided by the following school accountability principles:

- Accountability measures should be appropriate to schools that are designed as alternative options for youth who are at risk of dropping out of school or who may have already dropped out of school and seek a renewed path to school re-entry and graduation;
- Accountability measures should be clear and transparent and promise to inform school and system improvement and to promote organizational learning;
- Accountability measures should create incentives for school capacity-building, community partnerships, and expanded learning opportunities in support of student academic success and positive youth development; and
- Accountability measures should foster equity by making the alternative education sector, its students, and outcomes more visible to policymakers, stakeholders, and the public.

## Proposed Solution:

Many states have an application process for a school to qualify as an AEC or alternative high school. Alternative school status is awarded to schools that document a very specific mission to serve a high percentage of students, ranging from 20 to 90% averaging 67% (Momentum Strategy & Research), who meet the state-established criteria for AEC eligibility. The criteria for eligibility include a number of life circumstances, including being over-aged and under-credited, a returning dropout, pregnant or parenting, adjudicated, in the foster care or court system, and/or homeless, to name some of the most commonly identified circumstances. These

circumstances require that schools be able to give students more time to learn standards and graduate than their mainstream high schools peers.

We propose that high schools recognized as AECs in their respective states be held accountable for graduation rates recognized for AECs in their state. To honor the statutory requirement of two-thirds graduation rate, state education agencies (SEAs) would identify schools, recognized by that state as AECs that need assistance reaching a two-thirds graduation rate according to their own definition.

Such a change in US DoE rule has benefits throughout the nation. The change in rule:

- Still applies the two-thirds graduation rate to all high schools.
- Recognizes the distinct nature of AECs and the students who the AECs serve.
- Reinforces the notion that “one size does not fit all”
- Would create incentives for States to expand opportunities for youth, vulnerable to dropping out of school, to have a second chance to earn a standards-based diploma; and
- Respects the autonomy of each state when making decisions about their AECs

Using the same definition of graduation rate for both mainstream and alternative high schools could result in the following scenario:

If remaining with the current 4- or 5-year cohort rates, we will continue to

- Over identify AECs in need of support and under identify larger mainstream high schools from whom AECs receive their students,
- Complicate efforts by states to apply accountability metrics to AEC that enable meaningful differentiation in performance among AECs and identify those most in need of improvement.
- Incentivize school districts to shutter stand-alone AECs that are rated by state accountability systems, and viewable by the public, sending students to district run programs where those student outcomes are masked by larger school or district numbers and not available for public scrutiny, or result in vulnerable students leaving public education with no other viable option

AECs are a small percentage of the overall public education landscape, approximately 2% of all public elementary and secondary schools. They exist because the students enrolled in them cannot be successful at more mainstream schools. AECs are exceptional by design and so should their accountability metrics be. States are in a position to best understand what those metrics should be, and the federal department should honor those local decisions.



The National Alternative Education Association is a professional member association for alternative/non-traditional educators. Our vision is to engage and empower educators to positively impact students' lives by providing advocacy, resources and professional learning. The NAEA Board consists of its officers and nine regional directors, who represent every state in the United States plus Puerto Rico, the Virgin Islands and Pacific Islands.

We respectfully submit this position to the United States Department of Education and are honored that other associations and organizations have signed on to this statement.

Approved January 11, 2023

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