



July 20, 2020

The Honorable Robert C. “Bobby” Scott, Chairman  
Committee on Education and Labor  
U.S. House of Representatives  
2176 Rayburn House Office Building  
Washington DC 20515

Dear Mr. Chairman:

We are writing to commend your initiative in commissioning the recent GAO report, *Information on How States Assess Alternative School Performance*, and to offer resources and vital information to strengthen options for students at highest risk for dropping out of school. We share your objective of achieving rigorous and reasonable accountability for public schools that enroll these students.

A-GAME is a federally-funded project undertaken by Momentum Strategy & Research (which advised the GAO team in preparing its report) and the Michigan-based National Charter Schools Institute. We are working with a group of 48 charter school authorizers who collectively oversee roughly 56 percent of all charter Alternative Education Campuses (AECs) in 26 states. A-GAME is helping them develop and disseminate new kinds of evidence and accountability strategies to supplement the standard metrics required by state governments and the Every Student Succeeds Act (ESSA).

As the GAO report documents, the majority of AECs are district-run. We believe that our work in the charter sector has implications not only for non-charter AECs, but for all facets of public education accountability. As recent events have demonstrated, school systems across the country face an acute need to hold schools accountable for performance in more flexible and realistic ways, moving beyond the check-the-boxes approach that now predominates.

Through our work in the domains of both policy and practice, we have learned that AECs differ in fundamental ways from neighboring public schools. Most notably, they enroll a higher percentage of students who are over-aged and under-credited and multiple years behind in core academic subjects, which directly impact their on-time graduation rate and proficiency rate on state assessments in English and math. Today’s approach to AEC accountability, relying largely on the same generalized data sets collected for traditional schools that measure the success of schools with students who for the most part enter at grade level and on-track to graduate in four years, largely fails to address whether AECs are actually fulfilling their mission to turn around the educational and life prospects of highest-risk students.

We are particularly concerned that current accountability practices may be creating disincentives for qualified organizations to open new schools serving these students. Potential founders are wary of being branded a failure, even when doing good work for students. They know that they are likely



to see local headlines that mimic this section heading in the GAO report: “Alternative Schools Aim to Re-engage Students, but Academic Proficiency and Graduation Rates are Low.”

To be clear, GAO has done a good job of explaining this dynamic by naming incongruities in the way alternative schools are held accountable under the current undifferentiated systems, including those mandated by ESSA. These systems:

- Make no distinction between students who are at-risk due to poverty or disability, and those who have faced extraordinary trauma and have lost years of educational credits as a result;
- Make no allowance – and collect remarkably little data -- for schools that are small and have highly mobile students; and
- Rely on 4-year cohort graduation rates and state standardized assessments of proficiency, as required under ESSA, for schools whose students are experiencing circumstances that make such metrics invalid.

For more than a decade, Momentum’s research has shown that alternative schools do indeed have low proficiency rates and 4-year cohort graduation rates, although there is still great performance variation among AECs. Over the last 2 years, the A-GAME leadership team has built on this work to collect the largest and most up to date database of AEC schools and programs and their corresponding outcome data. This body of evidence allows us to evaluate AEC performance in context, providing comparative information on a national scale. Using this database, A-GAME has now created an interactive tool that not only brings the data presented in the GAO report up-to-date (or closer-to-date), but also includes additional new measures more distinctly suited to alternative schools such as extended graduation rates, multiple attendance rates, drop-out rates, and college-entrance exam scores.

The tool is available at <https://nationalcharterschools.org/a-game-grant/data-visualizations/>.

Clearly, there remains a huge amount of work to be done in compiling and interpreting data about the state of accountability for alternative public schools. This work will help answer questions raised by the report, among them the following:

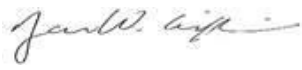
- Should juvenile justice schools, which are by definition smaller and shorter-term than others, be evaluated separately from other AECs?
- How do GAO’s alarming curriculum findings compare across different types of schools?
- To what extent are AECs actually being identified for targeted or comprehensive support and improvement – and is this affected by their status as either “school” or “program?”
- Does the small size of AECs drive maldistribution of support services (such as nurses and mental health providers) in district-run schools?

Finally, the federal government faces a series of policy choices ahead, including how to foster long-term improvements in data collection; whether to provide guidance to states on AEC accountability; and the possibility of treating AEC accountability more explicitly in the next iteration of ESSA. We trust that you will continue using your position to enhance the visibility of this issue as these options emerge.



We look forward to taking part in a robust national dialogue about alternative approaches to accountability, and remain grateful for your leadership in getting this issue on the table.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Griffin".

Jim Griffin, J.D.  
President & Co-founder  
Momentum Strategy & Research

A handwritten signature in black ink, appearing to read "Jim Goenner".

James N. Goenner, Ph.D.  
President & CEO  
National Charter Schools Institute