



MEASURING QUALITY

A Resource Guide for Authorizers
and Alternative Schools

VERSION 1

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Table of Contents

The Problem	1
A-GAME	3
Process	4
Recommendation #1: Define Alternative Education Campuses	10
Recommendation #2: Partner with Schools	13
Recommendation #3: Same Categories, Different Measures	16
Recommendation #4: Use Best Available Data	26
Recommendation #5: School Site Reviews	27
Recommendation #6: Professional Judgement	30
Appendix A: A-GAME Project Team	32
Appendix B: The National Authorizer Leadership Team	33
Appendix C: The National Advisory Committee	34
Appendix D: AEC Performance on Common Metrics	35



The Problem

“I walk in the building and see the good work the school is doing, but the school has an “F” on its state report card.”

“The school claims they re-engage students who have fallen through the cracks, but I do not know how to measure whether this is true.”

“The four-year adjusted cohort graduation rate for a credit-recovery school we chartered is close to 50 percent. What does that mean?”

“We can see by the data that students arrive with social emotional needs, but how much academic progress should I expect?”

Sound familiar?

We all know the basic charter compact cited across the country: *improved student results = increased autonomy + increased accountability*. Meaning simply, we, the charter school authorizer, give you, the charter school board, the freedom to make personnel decisions, choose your school’s leadership, adopt a curriculum and educational design; and you, Board, will ensure higher academic achievement and growth for your students. If you do not produce better academic results, then we may opt to revoke your ability to operate your school.

The problem explored in this report is not whether authorizers are holding charter schools to that basic compact. Rather, it is how they can fairly hold charter schools to that bargain when traditional measures of academic achievement and growth do not tell the full story about students in alternative education campuses¹ (or AECs).



¹ Defined later in this document.



For charter school authorizers, AECs can be a challenge, as students tend to be highly mobile and 79 percent of AECs serve students in grades 9-12², grade levels not tested as regularly by state standardized assessments. Therefore, data is scarce and not reflective of all students enrolled by the AEC throughout the year. This document provides concrete recommendations and specific examples on ways to measure outcomes for AEC charter schools³.

Measuring Quality: A Resource Guide for Authorizers and Alternative Schools is the first resource developed under the A-GAME project (see below), and is a working document that will continue to grow in breadth and depth as the project team learns more from the charter school and authorizing communities.⁴ Additional resources are also in development and will be published on the [A-GAME website](#) as they are ready.

A-GAME

Advancing Great Authorizing and Modeling Excellence (A-GAME) is a three-year project funded by the U.S. Department of Education through a Charter School Program Dissemination Grant (U282T180014) for the explicit purpose of developing and disseminating resources and tools to help charter school authorizers in the oversight of AEC charter schools.

The A-GAME project is co-directed by the National Charter Schools Institute (Charter Institute) and Momentum Strategy & Research (Momentum), with assistance from Nelson Smith (collectively referred to as the project team (see [Appendix A](#)

for details)). Together the project team brings a wealth of knowledge on issues of measurement and accountability policy and practice for charter schools, charter school authorizers, and alternative schools (charter or non-charter alike). In addition, the project team selected eleven charter school authorizers to form a National Authorizer Leadership Team (or NALT).

As with the general authorizing community, NALT members come from myriad contexts and historical backgrounds. They are large and small, state education agencies (SEAs) and independent



² Momentum Strategy & Research (2018)

³ While the authors recognize that some of the guidance may be transferable to overseeing more traditional schools, this document is specifically designed for use with designated alternative education campuses only.

⁴ This first version reflects the current practices of 11 charter authorizers and does not include input from school board members, leaders, and families. The leadership team recognizes the need to include more feedback and plans to add in subsequent versions.

boards, school districts and public universities, East coast and West coast, northern and southern. Some NALT members are in states with prescriptive statutes outlining how charters and/or alternative schools are identified and held accountable, while others come from states that provide authorizers with flexibility in how they oversee the schools in their portfolio—alternative or otherwise. The authorizers chosen for the National Authorizer Leadership Team all authorize at least one AEC charter school. The project team recognizes the contributions that each has made in getting accountability right for this group of schools and also how difficult getting it right can be. (See [Appendix B](#) for the list of participating NALT member organizations.)



Process

NALT members were convened three times between January and September of 2019 to work on the development of this and other project resources. The recommendations provided in this document were arrived at through thoughtful consideration of current policy, data, and information, which were presented to NALT members as a backdrop and starting place for the work.

Given the NALT’s contextual diversity, a variety of authorizer perspectives were considered in the development of recommendations. That being said, this document should be viewed not as a template, but as a guide for authorizers to consider when developing their own alternative accountability measures and frameworks. Every recommendation is written broadly enough to fit in most contexts and examples are specific, pulled directly from NALT organization best practices, but not necessarily applicable in all situations. In fact, the leadership team cautions authorizers to use the examples to generate a conversation to think differently about accountability, not as a “plug-and-play” solution. Readers are free to use any information presented in this document for their own practice and are encouraged to reach out to members of the project team with questions.

The leadership team acknowledges that a key voice is missing from version 1: feedback from leaders of AECs. The project team and NALT are seeking the input and feedback from AEC school board members, leaders, families, students, teachers, and authorizers to include in subsequent



versions. In addition to formal feedback sessions, which will be scheduled with AEC leaders within NALT membership jurisdictions, feedback may be provided via the contact form on the [A-GAME website](#).

Identifying Alternative Education Campuses

The first step in creating a framework for alternative schools is to identify which public charter schools should be considered an alternative education campus (AEC). We arrived at a set of recommendations by first considering an analysis of state policy, a process described in detail in Momentum’s 2018 report, *Alternative School Options across the US*.⁵ The NALT then discussed the data, adding their own perspectives, contexts, and practices, to arrive at an operational definition of each of the component pieces.

Alternative Education

The terms “alternative education” and “alternative school” have been used in education for decades. However, they do not mean the same thing to all people. When looking at state education policies, for example, there is no uniform definition of alternative education and/or schools. In some states, alternative schools are broadly defined and can be synonymous with schools that do anything in a non-



traditional way, including Montessori schools, virtual schools, and schools focused specifically on credit recovery for off-track students. In other states, the term alternative school/education has a specific meaning outlined in either statute or regulation and tends to focus on serving students who are “at risk of dropping out of school” or those who “have not been served well by traditional schools.” These students are often referred to as “high-risk youth.” For the sake of this Guide, as further detailed under Recommendation #1, NALT members recommend a limited definition to identify schools educating high-risk youth.

⁵ The 2018 report is available for download at <https://noycollaborative.org>.

High-Risk Youth

The term high-risk youth refers to student/youth populations with specific characteristics or life circumstances for whom alternative education tends to be designed. As previously mentioned, the NALT members arrived at the high-risk student characteristics listed below after careful consideration of local and state policies, data provided by the project team, and their own experience working with alternative charter schools.

- Students who have previously dropped out of school;⁶
- High school students who are more than one year behind their same grade peers, based on the accumulation of credits required to graduate;
- Any student who is two or more years behind their same grade peers in more than one core subject area (such as English language arts and mathematics), based on valid and reliable academic assessments;
- Expelled students;
- Chronically absent students, regardless of excused or unexcused absences (using ESSA definition and including truant students);⁷
- Students who have three or more avoidable enrollment occasions⁸ in a two-year period;
- Adjudicated youth (current or previous);
- Students who are in the foster care system or under supervision of the courts;
- Students experiencing homelessness⁹ or housing instability;
- Students who have drug or alcohol abuse issues;
- Students who are pregnant and/or parenting;
- Students who have experience with one or more of the following conditions that directly impact their ability to function in school:¹⁰
 - Trauma;
 - Mental health; and
 - Behavioral health.

⁶ The definition of a dropout varies across locations with state definitions often being tied to official count windows. Authorizers may want to consider establishing a minimum period of time out of school (e.g., one semester, or 90 consecutive school days), but need to also consider how such data will be collected.

⁷ For simplicity, this category is intended to capture all types of absences, including out of school suspensions.

⁸ Enrollment occasions that correspond with typical, or scheduled, movements from one school to another (e.g., moving from a middle school to a high school) should not be counted for this purpose.

⁹ Using McKinney Vento definition.

¹⁰ As with the chronic absenteeism category, the wording here is meant to consolidate a number of student circumstances, such as experiencing abuse or neglect, having an incarcerated parent or primary family member, experiencing the death of a parent or family member, as well as to provide flexibility for the school and their authorizer.



As such, for purposes of this project, an alternative education campus is described as:
“A (charter) school with a specific focus on serving high-risk youth, which provides relevant educational and support services to a disproportionately high percentage of high-risk youth.”

Students with Disabilities and Elementary Schools

The A-GAME Project Team and NALT members recognize that many students identified as high-risk also have diagnosed or undiagnosed disabilities. Furthermore, in some jurisdictions, special education status alone is also considered a “high-risk” factor. The general recommendations provided in this report may also apply when developing measures for charter schools serving primarily special education students, however, the project team does not include special education experts, nor does any of the research cited here or used to develop the recommendations isolate whether students have a disability, let alone the disability type or level of need. The project team and the NALT agree that this is a deficit and hope that subsequent versions of this resource can include explicit examples for schools serving high populations of students with disabilities.

Similarly, the recommendations presented here likely apply to alternative schools serving elementary grades only, pre-kindergarten (PK) and kindergarten (K)-8 and/or PK/K-12). However, research shows that the majority of these schools tend to be embedded within treatment facilities, behavioral hospitals, and detention centers. For a variety of reasons (e.g., small schools with limited assessment data, student privacy) there is limited data available to conduct research or provide informative points of comparison. Thus, it is difficult to provide solid examples regarding the specific measurement and evaluation for elementary grades.

School Mission, Focus, and Intent

An AEC commits to targeting high-risk youth and offers them an opportunity to matriculate to the next level of education in an environment that differs from that offered by more mainstream schools. The mission, or primary focus, of an AEC is usually specifically crafted within the charter application to convey the founders’ intent to provide alternative education.

This is not to be confused with the specific mission statement, which can often be broad and non-specific.

Disproportionately High Percentage

Ten out of the 14 states that specifically define alternative education as schools in policy¹¹ include minimum thresholds for the proportion of high-risk students needed to qualify. These state requirements range from a high of 90 percent high-risk (Colorado) to a low of 10 percent high-risk

¹¹ As opposed to states that define alternative options in policy as programs only or as either programs or schools.



(New Mexico), with the average state requiring 60 percent of a school's students to have at least one high-risk characteristic to qualify as an alternative school in the state.

In addition, several of the NALT authorizers also require a minimum proportion of high-risk students to qualify as an alternative charter school. The important factor to consider when determining a threshold is to ensure that there is a distinct difference between a general education school and an alternative school. When referencing the percentages, it is important to note that not all states utilize all the same high-risk characteristics listed earlier in this guide, which may partially explain the variation in overall percentage.



Table 1. Proportion of High-risk Students Required by the Authorizer and/or the State for a Charter School to Qualify as an Alternative School

NALT Member	Authorizer Requirement	State Requirement
Alameda County Office of Education, CA	>69.9%	>69.9%
Buckeye Community Hope, OH	>50.0%	>50.0%
DC Public Charter School Board	>59.9%	Refer to Authorizer
Central Michigan University	None specified for alternative schools	Alternative school definition under development ¹²
Ferris State University, MI	100% for strict discipline academies	100% for strict discipline academies
Chicago Public Schools, IL	None specified	None specified
Hillsborough County Public Schools, FL	None specified	None specified
Nevada State Charter School Authority	>74.9% ¹³	>74.9%
SUNY Charter Schools Institute, NY New York State Department of Education	None specified	None specified

Source: Momentum Strategy & Research.

In acknowledgement of the vast policy differences, both state and local, the following recommendation is presented as a list of items to consider as authorizers develop their own policy for identifying schools that will be evaluated under an alternative accountability structure.

¹² MI legislation passed in December of 2018 (HB 5526, H-3) directs the state department of education to define “specialized pupil populations with special needs” that schools serve in order for the school to qualify as an alternative campus (outside of schools serving adjudicated youth or that are structured as strict discipline academies. (HB 5526)

¹³ The authority’s one alternative school is contractually required to admit only students meeting the state’s qualifying pupil criteria.



Recommendation #1: Define Alternative Education Campuses

Create a limited definition for alternative accountability that includes only schools that both aim to serve and actually serve a high-risk population.

While there are students who are high-risk of all ages attending all types of schools, not just alternative education campuses, the concentration of high-risk students at AECs creates an urgency for authorizers to develop alternative accountability. These schools are at risk of being misunderstood, leading to the continuation of schools that are warehousing, not educating, as well as closure of high-quality AECs. The authorizer can identify these schools by developing a comprehensive list of high-risk factors; a minimum percentage to be considered a high concentration; a requirement that schools are designed to be outside general education and general education accountability.

The NALT's recommended list of high-risk student factors are provided here again for ease of reference:

- Students who have previously dropped out of school;¹⁴
- High school students who are more than one year behind their same grade peers, based on the accumulation of credits required to graduate;
- Any student who is two or more years behind their same grade peers in more than one core subject area (such as English language arts and mathematics), based on valid and reliable academic assessments;
- Expelled students;
- Chronically absent students, regardless of excused or unexcused absences (using ESSA definition and including truant students);¹⁵
- Students who have three or more avoidable enrollment occasions¹⁶ in a two-year period;
- Adjudicated youth (current or previous);

¹⁴ The definition of a dropout varies across locations with state definitions often being tied to official count windows. Authorizers may want to consider establishing a minimum period of time out of school (e.g., one semester, or 90 consecutive school days), but need to also consider how such data will be collected.

¹⁵ For simplicity, this category is intended to capture all types of absences, including out of school suspensions.

¹⁶ Enrollment occasions that correspond with typical, or scheduled, movements from one school to another (e.g., moving from a middle school to a high school) should not be counted for this purpose.



- Students experiencing homelessness¹⁷ or housing instability;
- Students who have drug or alcohol abuse issues;
- Students who are pregnant and/or parenting;
- Students who have experience with one or more of the following conditions that directly impact their ability to function in school:¹⁸
 - Trauma;
 - Mental health; and
 - Behavioral health.

When completing this task be sure to consider the following:

- Is data readily available to verify that a student possesses the high-risk factor?
- If data is not readily available, what protocols will the authorizer/schools/district need to have in place to provide assurances that students possess the reported high-risk factor?
- Will students continue to be considered high-risk if they no longer possess the identified characteristic, factor, or life circumstance and remain enrolled in the alternative school (e.g., are no longer homeless or they earn enough credits to now be considered “on track”)?

Having student data collection protocols in place that protect student and family privacy and provide clear direction to the school, the school board, and the authorizing board will go a long way toward creating a smooth process for annual reporting, if they are figured out prior to the school opening. Some authorizers hire a third party with expertise in identifying high-risk youth, such as a social worker, to verify data. This person may interview students and staff and review records.



High Percentage

Require that a high percentage (e.g., >69.9 percent) of the schools' students have at least one high-risk factor.

¹⁷ Using McKinney Vento definition.

¹⁸ As with the chronic absenteeism category, the wording here is meant to consolidate a number of student circumstances, such as experiencing abuse or neglect, having an incarcerated parent or primary family member, experiencing the death of a parent or family member, as well as to provide flexibility for the school and its authorizer.

Where an authorizer's state or local policy does not dictate a specific percentage of high-risk students needed for a school to qualify for alternative accountability, the authorizer may want to conduct research locally on the average percentage of students meeting the high-risk criteria who are enrolled in local alternative schools, charter or otherwise.

With a well-defined process for identifying which of an authorizer's charter schools qualify as AECs, the process of determining the measures, metrics, and targets for success becomes a bit more straightforward, and is the focus of the remainder of this resource guide.

Mission/purpose/vision

Ensure the school leadership and board articulate a mission and purpose to recruit and educate high-risk students.

The goal is to ensure that AECs educate high-risk youth and actually serve that population in order to qualify under an alternative accountability system. When a school that has a "college prep" or other traditional mission, school day, and course offerings attracts a higher percent of high-risk youth than expected, it does not mean it is eligible for alternative accountability. Families chose this school because of its mission and purpose of a traditional education. Conversely, a school with an explicit mission to serve high-risk youth that does not end up attracting a disproportionate percentage of these students would not be considered an AEC.

Adult Education (GED/NEDP/CTE) Programs

Schools or programs in which the only possible certificate of high school completion is a General Education Diplomas (GEDs) or National External Diploma Programs (NEDPs) or Career and Technical Education certificate (CTE) are not considered AECs for purposes of this resource. This is because the programs are outside of the reporting and monitoring requirements for states mandated by the Every Student Succeeds Act (ESSA). These schools are not eligible for ESSA-related funding and not held to ESSA-related state accountability, including having students take state-required assessments. Furthermore, they would not have Adjusted Cohort Graduation Rates (ACGR) and many are competency-based programs with different attendance requirements. However, schools that offer multiple high school completion options, including regular diplomas and GEDs, for example, are considered AECs for purposes of this document. Authorizers with schools offering only GEDs, NEDPs, and/or CTEs may wish to use some of the measures in this framework and may wish to approach accountability in a similar manner.





Recommendation #2: Partner with Schools

Once schools are identified as AECs and qualify for alternative accountability, an authorizer is faced with the responsibility of creating standard measures for similar schools and similar missions. In some states, AECs are evaluated using the same measures and entire frameworks as traditional schools. In these cases, AECs will likely have lower rates on almost every measure due to the target population's high-risk factors. These traditional rates, which do not accurately capture youth with high-risk factors, include four-year graduation rates, in-seat attendance rates, and proficiency rates on one-time-per-year assessments. To avoid AECs being identified as low quality simply due to the population they serve, NALT authorizers have adopted measures that are both rigorous and attainable for the school's population. However, in developing these measures, NALT members worked with the schools they oversee. Where possible, NALT members have often worked in collaboration with their alternative charter schools to identify the measures and/or metrics that make the most sense.

While it is not always possible,¹⁹ if the authorizer is able to provide some amount of flexibility and/or collaborate with its alternative charter schools in the development of their accountability framework or accountability plans, then relations tend to be better and schools often report feeling validated.

¹⁹ State laws may affect an authorizer's ability to use measures outside the state's own accountability system for purposes of making high stakes decisions.

Table 2 outlines the level of flexibility currently maintained by alternative charter schools authorized by the NALT members. Each level of flexibility is defined as follows:

- **No Flexibility:** All alternative charters are evaluated by the same framework with no additional or optional measures.
- **Limited Flexibility:** Most measures in the authorizer’s framework are consistent across alternative charter schools, but each school can select one or two unique or mission specific measures.
- **Moderate Flexibility:** Though there are multiple measures that are consistent across alternative charters, each school is also able to select/propose several unique or mission-specific measures.
- **Highly Flexible:** Nearly all, if not all, the measures in the alternative schools’ accountability framework are unique to the alternative charter school.

Table 2. Flexibility for Alternative Charter Schools to Select Measures within their Alternative Framework among the NALT Member Schools

Authorizer	Level of Flexibility for AECs to Customize their Authorizer's Alternative Framework ^a			
	No	Limited	Moderate	High
Albany County School District		X		
Audubon Center of the Northwoods ^a				X
Buckeye Community Hope Foundation		X		
Central Michigan University	X			
Chicago Public Schools	X			
DC Public Charter School Board				X
Farris State University				X
Hillsborough County School District		X		
Nevada State Charter School Authority				X
New York State Education Department			X	
SUNY			X	

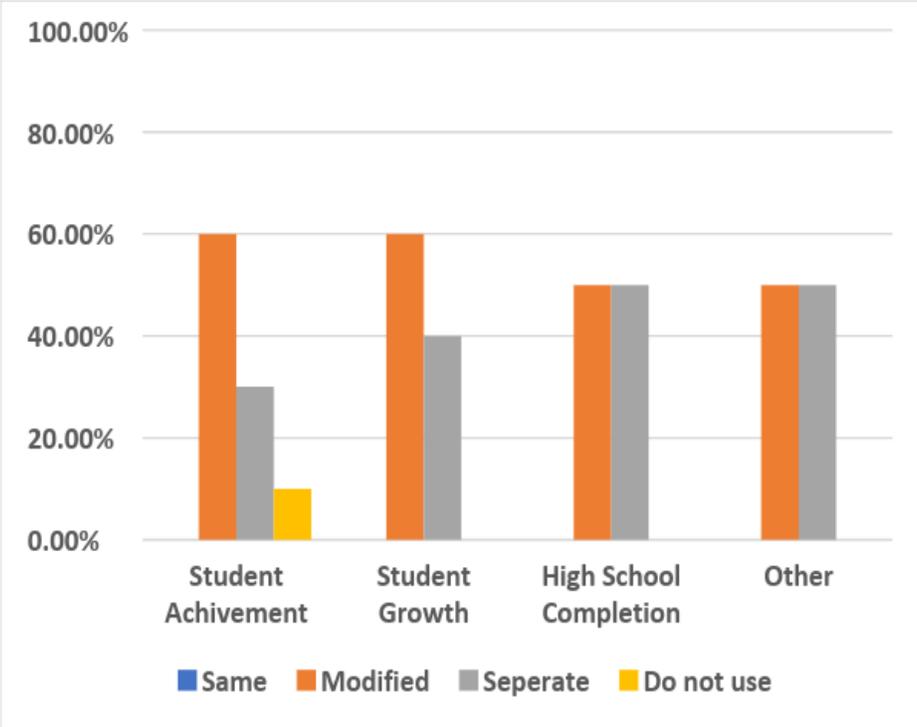
a. This term includes measures and goals set forth in the charter school’s contract with the authorizer. When offering flexibility, it is important to ensure the same standard for quality is consistently applied across schools.



Providing Accountability for Alternative Charter Schools

All NALT members agree that schools educating high-risk students need to be held accountable for student outcomes. However, they also agree that the measures used to evaluate the outcomes of alternative schools cannot always be identical to those used to measure traditional schools. For example, a school designed to re-engage high school dropouts cannot be expected to have the same target for its four-year adjusted cohort graduation rate as a traditional high school. To that end, all of the participants reported that they either modify traditional measures or use completely separate outcome measures for the alternative schools they oversee (see Figure 1).

Figure 1. NALT member responses to survey questions regarding their use of separate or modified measures for their alternative charter schools



In addition to measuring student outcomes in traditional categories, NALT members also said that they included measures to reflect social-emotional learning. With resources dedicated to wrap-around services to prepare students who have one or more high-risk factors to be ready to learn, measuring the success of these motivation and engagement efforts are leading indicators and a welcomed component of a successful AEC framework.



NALT members incorporate alternative schools' accountability measures and metrics in a number of ways, including:

- **performance plans**, as set out by the school within the charter agreement and including specific measures and goals for success;
- **performance reports**, as set out in authorizers' end of year summation of the schools' performance and including the alternative charter schools' performance against their contractual goals; and
- **evaluation reports**, conducted or mandated by the authorizer to provide additional qualitative data to the review of the school, including on-site visits with classroom observations and evaluations.

Recommendation #3: Same Categories, Different Measures

Authorizers can expect to review outcomes under the typical performance categories, but should use different measures and metrics for doing so.

In reviewing the eleven NALT members' alternative accountability frameworks, we found a surprisingly uniform set of indicators (or categories) for evaluating alternative charter schools' success. Perhaps more surprising is that these indicators parallel those found in accountability frameworks for non-alternative charter schools. Perhaps this finding is driven largely by federal and state accountability policies, but the NALT tended to agree that these categories are the correct categories for measuring AEC quality and that innovative outcome measures can be used under each of the following categories:

1. Student Motivation and Engagement
2. Academic Achievement
3. Academic Growth
4. College and Career Readiness
5. High School Completion

Where NALT members' frameworks differed from one another, and from traditional accountability systems, is in HOW alternative school success is measured in each category. Rather than using traditional measures of quality, such as attendance rates or four-year adjusted cohort graduation rates, NALT members use different assessments, targets, and/or time-periods to capture alternative school success. In other words, while the NALT authorizers measure success of the same



overarching school outcomes, they use different methods of assessing their alternative charter schools' outcomes within those areas.

The following sections provide examples of the ways NALT members, as well as other authorizers, measure AEC outcomes under indicators 1-5, listed above. In each set of examples, we provide a side-by-side comparison of traditional and alternative data/assessment for a specific measure.



Student Motivation and Engagement

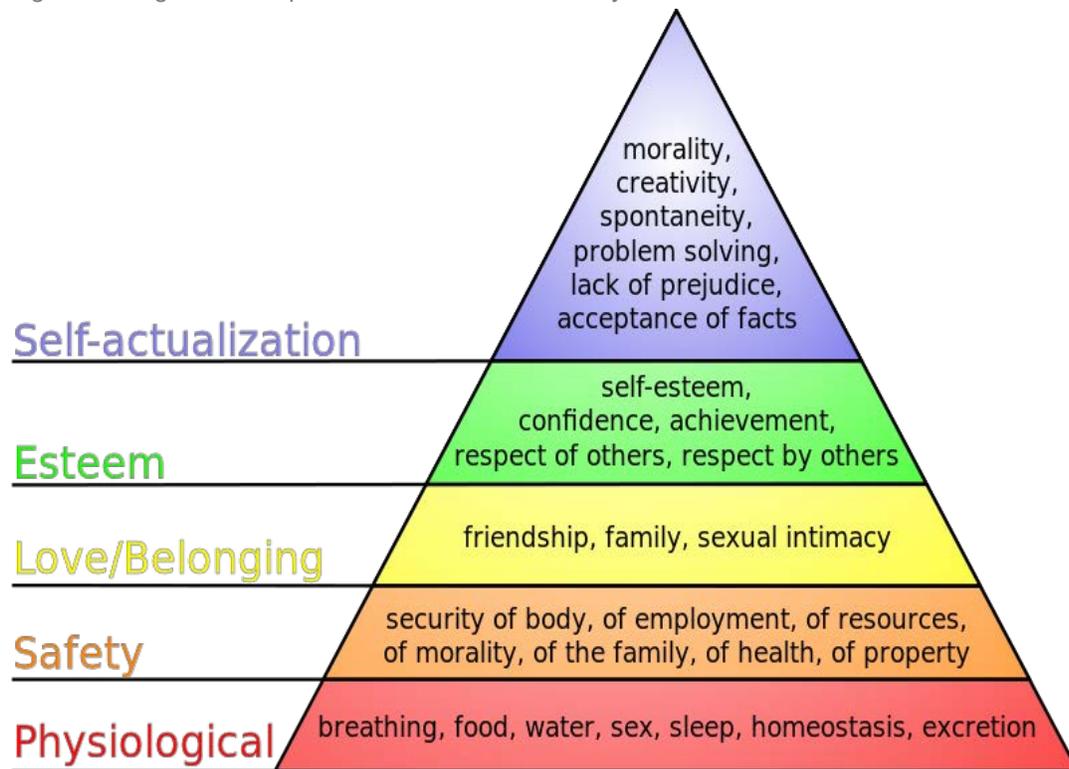
Most alternative schools offer student support services outside of the area of academics, generally referred to as “wrap-around” services. Wrap-around services include housing assistance, counseling services, daycare for students' own children, free laundry services, and more. In addition, some alternative charter schools incorporate adult-to-student and student-to-student support groups to facilitate students' feeling of belonging and to help identify when a student might be struggling. For some students, their support needs are so great that they lack the capacity to focus on their education.



Psychologists have long recognized that individuals need to have their most basic needs met before they are able to focus on self-indulgent endeavors, like engaging in self-betterment through education. Maslow's Hierarchy of Needs,²⁰ diagrammed in Figure 2, illustrates the general order of prioritization that he and others in psychology believe the human mind places on daily living activities.

²⁰ Maslow, A. H. (1943). A theory of human motivation. *Psychological Review*, 50(4), 370-396.

Figure 2. Diagram of the phases of Maslow's Hierarchy of Needs²¹



According to Maslow, students who are food or housing insecure or who reside in a violent home or neighborhood may be unable to focus on learning for extended periods of time (if at all). Thus, by providing wrap around services, alternative charter schools are helping to remove, or at least lessen, the barriers to learning for their students.

This then led the NALT and leadership team to wonder: How can you measure how students make progress toward learning readiness or engagement? These next recommendations focus on this question and attempt to consider solutions.

Measures of student motivation and engagement fall into the much larger category of social emotional measures and can be used to identify supports that students need when they enroll in a school. These measures can also be re-assessed to track students' progress in these areas as well, signaling when students might be better able to focus on their education. In this way, the NALT discussed the use of student engagement and social-emotional measures as leading indicators of student academic growth.

²¹ J. Finkelstein. 2006. Creative Comments
(https://commons.wikimedia.org/wiki/file:Maslow%27s_hierarchy_of_needs.svg)

Some examples of student engagement measures are provided in Table 3, which includes both summative (or end of year outcomes) and growth measures, tracking students' progress over time.

Table 3. Example Student Engagement Measures and Metrics used by Authorizers of Alternative Charter Schools.

School Engagement Measure	Traditional Metric/Target	Example Alternative Metric/Target
Student Motivation to Learn	n/a	Average change score from pre and post assessment of school motivation for all students who were enrolled in the school for at least one semester
School related Self-Efficacy	n/a	Percent of students score at least a score of X on the school self-efficacy scale at the end of the term Plus Percent of students that scored under TBD at the end of the term, but increased their score by at least Y points between the beginning and end of the term.
Student Engagement	An in-seat attendance rate of at least 92%	Percent of students to increase their attendance rate over last term by TBD% or more OR maintain an attendance rate of at least TBD%
Chronic Absenteeism	Percent of chronically absent students is less than state defined cut-point	Change in the chronically absent rate, based on individual students, over time
Credit Completion	Percent of 9 th graders on-track to graduate high school in four years	Increase in average proportion of credits students completed (i.e. credits earned/credits attempted) each term
Student Re-engagement	n/a	Percent of prior dropouts that maintain enrollment through the end of the school year (or until graduation) whichever comes first.
Student Persistence	n/a	Percent of students enrolled and maintaining a TBD% attendance rate (or better) for the term
Stabilization Rate	n/a	Percent of students enrolled in the school in the beginning and end of year count dates

There are many school-related motivation and engagement measurement tools that have been created for use in and outside of the clinical space, as well as some websites that have made searching for the right social-emotional assessment a bit easier (see table 4). However, authorizers should know about several items schools need to consider when selecting appropriate tools (see



Key Insight: Selecting Social-Emotional and other Non-Traditional Measures below for more information on items to consider when searching for a social-emotional measurement tool).

Table 4. Sample of Web-based Resources for Researching Social-Emotional Assessment Tools

Organization	Search Tool Name
CASEL	Measuring SEL Assessment Catalog
Perform Well	Find Survey/Assessments
RAND Corporation	RAND Education Assessment Finder
School Social Work Association of America	Assessments, Measurement Tools , and Screening tools

Key Insight: Selecting Social-Emotional and other Non-Traditional Measures

There are many things to consider when selecting social-emotional measures, particularly if the data from the measures will be aggregated and used for accountability purposes. Perhaps the most important is to be sure that the school is intending to provide support that targets change in the behavior, perception, or attitude being measured. For example, if a school proposes to show average change in students' ability to self-regulate their emotions through the *Adolescent Self-Regulation Inventory*, the school should also be providing curricula or support services that teach students self-regulation skills. Second, the assessment should measure a *malleable* characteristic, attitude, or behavior and not a personality trait or other trait that is not likely to change in response to school-level interventions or programming.

Other considerations for selecting appropriate social-emotional measurement tools include the following:

- Was the tool developed by professional assessment developers and validated for use with people matching the general description of the students enrolled in the school (with respect to age, grade level, and/or developmental reading level)?
- Was the measure developed as a pre-post assessment tool?
- Does the measure have a clearly articulated method for interpreting individual (e.g., scale scores) and/or group responses (e.g., average scale scores)?
- Does the tool require that a person with specific training administer the assessment?
- How long is the assessment and will the information gleaned justify its length?

Authorizers should be prepared to ask these questions anytime a charter school is proposing to use social-emotional measures or other self-report measures about students' attitudes, beliefs, and/or perceptions.



Academic Achievement

Academic achievement is one of the most challenging areas for which to find suitable alternative measures, in part because the average length of time high-risk students remain enrolled in alternative schools is typically less than six months. For this reason, NALT members highly recommend the use of third-party assessments that can capture academic achievement gains within the short period of time the student may be engaged at the school. There are many nationally normed, third-party assessments aligned to common core standards that measure students not captured through a state assessment given once a year, at most, and once in a student’s high school career, at minimum. The benefit of these assessments is that they can be administered multiple times a year and, thus, AECs can capture (and report) data for more students than those who are enrolled for a full academic year. Table 5 provides examples of how authorizers use statewide assessments, third-party assessments, and measures of competency in their alternative school performance frameworks.

Table 5. Example Measures, Metrics, and Targets for Evaluating Alternative Charter Schools’ Student Achievement Outcomes

Academic Achievement Measure	Traditional Metric/Target	Example Alternative Metric/Target
Achievement on state-required assessment (English language arts and math)	Percent of students to score proficient or better	For students whose attendance rate is at least TBD%, the percent of students who receive a passing score on the statewide assessment
Achievement (comparative) on state-required assessment (English language arts and math)	Percent of students to score proficient or better will meet or exceed the average percent of “similar schools”	Percent of students scoring proficient or better will meet or exceed the statewide average for alternative schools serving similar grades and target population ²²
Achievement on nationally normed, valid, and reliable assessment	Percent scoring at or above grade level	Percent scoring at or above grade level PLUS (for students that are more than one year behind) the percent who increased more than one grade level equivalent by the end of the year
Achievement on nationally normed, valid, and reliable assessment	Percent scoring at or above grade level	Average scores equal to or greater than their same grade peers enrolled in other alternative schools

²² Where a state has fewer than 10 alternative schools, the authorizer may want to consider a regional or national average.



Academic Growth

Individual student growth measures are one of the best indications of how well students are progressing while enrolled in school. However, Dr. Jody Ernst and colleagues have found that students enrolled in alternative schools across the country tend to have slower growth rates, on average, than their same grade peers enrolled in mainstream schools.²³ In comparing high-risk students' growth to students with a similar starting point (such as a grade level equivalent score), their average growth is comparable to others with similar starting scores, regardless of educational setting.

Very few statewide growth measures compare the growth of students with similar starting points (regardless of the students' actual grade level). Therefore, we provide a number of comparisons that authorizers can consider, depending on the type of assessment used (see Table 6).

Table 6. Example Growth Measures, Metrics, and Targets for Evaluating Alternative Charter Schools' Effectiveness

Growth Measure	Traditional Metric/Target	Example Alternative Metric/Target
Growth on state-required assessment (ELA or math)	A median growth percentile of 50 or higher	A median growth percentile of 40 or higher ²³
Growth on state-required assessment (ELA or math)	A median growth percentile of 50 or higher	A median growth percentile at or above that of other similar alternative schools (with same grade ban, mission, and target population) in the state, district, or country
Growth on a normed, short-cycle assessment	Average scale score growth compared to the norming sample	Average scale score growth compared to an alternative norming sample

There is a plethora of normed assessments available for purchase. Authorizers should allow schools to choose the assessment tool that best aligns with their program and students served. Table 7

²³ Ernst, J.L. (2009). Are Alternative Growth Goals Warranted for Colorado's Alternative Education Schools and Students. Colorado League of Charter Schools. Denver, CO. Available upon request.

Ernst, J.L. & Turnbull, J.J. (2010). Alternative Growth Goals for Students Attending Alternative Education Campuses: An analysis of NWEA's MAP Assessments. Colorado League of Charter Schools. Denver, CO. Available upon request.

Ernst, J.L. (2016). 2015 Alternative Norming Study: NWEA MAP. Momentum Strategy & Research, Denver, CO. Available upon request.

Ernst, J.L. (2016). 2015 Alternative Accountability Report: STAR 360 Growth. Momentum Strategy & Research, Denver, CO. Available upon request.



provides a short list of assessments currently approved for use across the country in alternative schools' accountability systems. These assessments, in some cases, replace the state assessment, or, at minimum, are provided in addition to it.

Table 7. Assessments being used by AECs which could also be used for Accountability Purposes*

Vendor	Assessment	Normed Grade Levels	Other features
College Board	Next-Generation Accuplacer	HS and College Entrance	Computer Adaptive, used to place students into college courses
California Adult Education Accountability & Assessment	GOALS assessments, Life Skills assessments, workplace assessments	14 years old to adult	Includes assessments for adults with limited to no literacy skills
Assessment Technology Incorporated	Galileo for K-12	K-12	large item bank, computer adaptive, pre/post testing, end of course testing
Renaissance Learning	STAR 360	K-12	Large item bank, can be given weekly
Northwest Education Association	Measures of Academic Progress	K-11	Computer adaptive, Science and end of course assessments for high school level math courses also available, can be given up to 4 times per calendar year
Scantron	Performance Series	K-12	Computer adaptive, used for benchmarking and growth
McGraw Hill/CTB	Test of Adult Basic Education (TABE)	14 and older	Measure of academic readiness for entry into trade and technical schools; Multiple difficulty level assessments so adults at any literacy level can be assessed
ACT	WorkKeys	14 and older	Assesses academic and non-academic skills needed to succeed in the workforce; multiple difficulty level assessments

*The appearance of an assessment or vendor on this list should not be taken as an indication of preference for one assessment over another by the National Charter Schools Institute, Momentum Strategy & Research, or any of the participating authorizers or reviewers. Schools and authorizers need to conduct due diligence when researching assessments to ensure the assessment will meet the needs of the school and the schools' students.



College and Career Readiness

As most alternative charter schools serve high school grades (roughly 83 percent), it was not surprising to find that NALT members tended to incorporate multiple measures of College and Career Readiness (also referred to as Post-Secondary Readiness), into their charter school contracts and/or performance frameworks. Table 8 provides some examples of different ways to measure college and career readiness for alternative schools.

While authorizers of alternative charter schools use college-ready assessments, Table 8 shows there are more relevant measures of students' preparedness for life after high school. These additional measures provide an authorizer with meaningful data to judge a school's effectiveness.

Table 8. Examples Measures of College and Career Readiness used by Charter School Authorizers for their Alternative Charter Schools

College/ Career Readiness Measure	Traditional Metric/Target	Example Alternative Metric/Target
Subject Area Mastery	Percent of students who "pass" AP or IB assessments	Percent of graduates to complete art portfolios deemed proficient by a panel of external experts, using a portfolio rubric
Credit Accumulation	Percent of 9 th grade students on track to graduate in four years	Percent of students who are between 0.5 and 1.0 year off track who earn enough credits to be on-track to graduate with their cohort The percent of students who are more than one year off-track to decrease their credit gap by 25% or more
College Readiness Assessment	Percent of students earning a score on the SAT or ACT that shows career and college readiness	Percent of students who receive a minimum score on a college readiness assessment (signifying they do not need more than a semester of remediation)
Career Readiness Assessment	Index scores including both college and career assessment outcomes	Percent of 12 th grade students to score a bronze or better on the WorkKeys assessment
Military Readiness Assessment	n/a	Percent of students with an interest in joining the armed forces to receive the minimum score for entry into their preferred branch on the Armed Services Vocational Assessment Battery (ASVAB)
College/Career Credentials	n/a	Percent of graduating students who have earned at least three college credits or an industry approved career and technical education credential
Post-Secondary Success	Percent of graduating students who enroll and/or persist in college	Percent of high school completers to enter the workforce or postsecondary education within six months after graduating



High School Completion

The four-year adjusted cohort graduation rate (ACRG) measures the percent of students who complete high school within four years of entering or have successfully transferred to another high school offering a diploma. Alternative Education Campuses tend to be the school to which the students transfer when they are “off track” to graduate in four years. While some students, through credit acceleration and targeted interventions, can graduate within four years upon transferring, the vast majority require more time. As with other academic indicators, there are a number of ways to measure high school completion outside of the federally required four-year adjusted cohort graduation rate (see Table 9).

Table 9. Example High School Completion Measures and Metrics for Evaluating Alternative Charter Schools

High School Completion Measure	Traditional Metric/Target	Example Alternative Metric/Target
Graduation Rate	At least 67% of students will graduate within four years of entering 9 th grade	At least 67% will graduate within six years of entering 9 th grade
Lever Rate		Percent of seniors at the beginning of the year who receive a high school diploma by the end of the year
Comparative Grad Rate		Percent of high-risk students will exceed the citywide graduation rate for high risk students
Completion Rate		Percent of non-graduates earning a GED or NEDP OR Percent of students attempting and passing one GED subject exam
Graduation Index Score		Overall index score based on the number of students to graduate (on or off track), complete a high school equivalent certificate, completion of a CTE certificate, or remain enrolled in school



Key Insight: Alternative Charter School Accountability Metrics for High School Completion and ESSA Requirements

While the federal Department requires states to use the same measure of high school completion for all its high schools, for purposes of identifying schools in need of intervention support, authorizers may not be bound to these same requirements. In states where authorizers are permitted to set their own contractual expectations and goals with their charter schools, they can also opt to incorporate a different high school completion measure into those agreements. Alternative schools will still need to report high school completion data according to the state's approved metrics under the Every Student Succeeds Act (ESSA), but in some cases authorizers are not required to include the ESSA-defined high school completion metric in their charter contracts with alternative charter schools.

Authorizers should review both charter law and their state's approved ESSA plan to understand what level of flexibility they have in defining their charter schools' contractual goals.

When assessing students, whether using state-defined measures, such as graduation rates or achievement rates on state assessments, or school-chosen and administered assessments, such as a nationally normed assessment, authorizers need to consider how best to assess whether an AEC's outcomes are "good enough" to warrant another charter term.

Recommendation #4: Best Available Comparison Data

To assess whether and AEC's outcomes are "good enough" the NALT recommends using the best available comparison data.

The area in which the NALT members confessed to struggling most, when it comes to evaluating their alternative charter schools' effectiveness, is the lack of readily comparable data. Where there is a lack of comparable data, the project team noted one of two scenarios:

1. The authorizer held its alternative charter schools to the same standards as non-alternative schools (e.g., average district performance or average state performance), or
2. Standards for improving outcomes over baseline performance were set arbitrarily (e.g., annual outcomes will increase by 10 percent each year until they reach a specific percentage).



With no comparative data available, it is reasonable that authorizers would use one or both methods. Unfortunately, the charters in those situations are at high risk of non-renewal due to perceived, but potentially inaccurately captured, low performance.

Wherever possible, setting targets for alternative charter schools should be done using the best available data from similar schools and/or similar student populations. Unfortunately, comparable data is not always easy to find. One goal of the A-GAME project is to provide resources to authorizers to make authorizing alternative charter schools more straightforward than it has been. One way of doing this is to provide data, where available, that can be used to help inform how alternative schools perform on outcomes like cohort graduation rates, attendance rates, and grade-level proficiency in ELA and math. [Appendix D](#) provides a summary of publicly available outcome data, collected and aggregated by Momentum prior to this grant project. As part of the project, Momentum will update the tables each year and those updated data will be available to the public on the A-GAME website.

Recommendation #5: School Site Reviews

Site reviews help provide insight when the data alone cannot.

A number of the NALT members conduct periodic site reviews with their charter schools. During these reviews, authorizer staff and/or third party reviewers visit the schools to gather qualitative evidence to support the quantitative data mentioned above. Investing the resources in

conducting periodic site reviews allows the authorizer to confirm whether the quantitative data is an accurate portrayal of the schools' teaching, learning, and climate. This is exceptionally important for alternative schools, where the performance on standard measures, such as four-year graduation rates or proficiency on state assessments, may not accurately portray the quality of instruction. Likewise, a relatively low attendance rate may or may not be indicative of a less than stellar school climate.



The primary purpose of site visits is to inform authorizing decisions. The decisions may be imminent (whether a school is ready to open, whether the charter should be revoked or renewed); or far-off (if a visit is routinely undertaken in the second or third year of the charter). Visits are intended to gather evidence against a certain framework; review and analyze documentation that is better understood on-site; explain the results of other data, such as test scores or attendance rates; assess the school's progress toward achievement of charter goals; and develop a profile that can be provided to the school, showing both its progress and its challenges. In essence, the site visit “holds up a mirror.” Similarly, site visits assure that an authorizer has “seen for herself” when a failing school must be closed. In these cases, the site visit creates powerful, story-based evidence supporting the authorizer’s decision.



When using data from a site visit to support a decision for closure or non-closure, the site visit must use protocols and rubrics for structure. Site visits can be scheduled on an annual calendar, announced well in advance, or unannounced. While most site visits are to the campus itself, a visit to the “home office” or other venue may be useful when a charter network is involved.

Although the principal value of site visits is to illuminate school performance and assist in authorizing decisions, they can also have direct benefits for authorizing practice. Taking part in a well-structured visit and/or analyzing reports from contracted site review teams can develop authorizers’ analytic skills and sensitivity to critical information.



Prepare and Conduct a Visit

This section presents key facets of monitoring and renewal site visits. It does not deal with the unique requirements of pre-opening visits, compliance visits (including special education), or visits in response to reports of problems at a specific school.

The school's case. Depending on the stakes attached to a particular visit, the authorizer may ask the school to do its own self-evaluation, much as is done in an accreditation process. It needn't be exhaustive and should be guided by a set of standard questions about instruction, operations, and school culture. Otherwise, the site team should simply be given a summary of data on school performance provided by the authorizer, as well as a copy of the most recent site visit report.

Scheduling – or not. If an authorizer conducts routine annual visits, the office may contact the school and agree to specific dates for the upcoming visit. But an authorizer may also provide a two-week window for an unannounced visit, in order to get the most realistic view of the school. The duration of the visit depends on its scope and depth. If the same team looking at the school program is also doing a compliance review, it may add a half to a full day to the schedule. If the visit involves classroom observation, enough time must be provided to avoid a casual drop-by. If parents and board members are to be interviewed in groups, enough time must be provided to ensure productive discussion, knowing that it takes a while to break the ice.

What to look for. The site visit team should include experts in alternative education, including someone who understands socio-emotional learning. One option is to enlist leaders of alternative schools in other jurisdictions to participate in a site visit. All site visit members should be fully trained on the rubric and show that they are aware of their biases and therefore able to evaluate a school. The site visit team should be looking for things you can only learn from site visits, for example:



- Does the school provide a safe and welcoming environment?
- Is time being used well? Is high-quality instruction going on every available moment?
- Is there a collegial professional culture among the adults?
- Are students actively engaged in learning? Is there an attitude of respect between staff and students?



- If a student is in crisis, is the school appropriately responsive?
- Are all spaces within the school in which students are observed safe, clean, and supervised? (This includes in-school suspension rooms, detention rooms, and, if appropriate, seclusion rooms.)
- Does the evidence of the visit match the school's written claims with respect to parent satisfaction, special education services, and fidelity to the charter?
- Does the visit provide a convincing explanation for unexpected variations in performance data?
- What is the quality of governance? Are board meetings productive and are members and other stakeholders fully engaged?

When compiling the different evidence together to make a decision about renewal, the authorizer has the responsibility to weigh all factors, highlight the strengths and weaknesses, and identify and reconcile areas of inconsistencies. This is a heavy responsibility, requiring significant confidence in the quality of the measures used and the validity of the data. This report provides a number of ways to improve the school and authorizer experience when measuring AECs but recognizes that the authorizer's background knowledge and experience is a critical factor.

Recommendation #6: Professional Judgment

Authorizers should include expert(s) in alternative education on their review team and together cultivate sound judgment about the quality of the alternative charter schools.

When schools defy convention, as many alternative charters do by design, they pose a particular challenge for authorizers who believe that approval and renewal decisions result from checking boxes. But as the National Association of Charter School Authorizers (NACSA) found in its Quality Practice Project, the strongest authorizers rely to a surprising extent on *professional judgment*.²⁴

“Professional staff is not bound by protocols, templates, or other authorizing tools that limit their decision making. Staff has a clear belief and orientation that such tools assist, not dictate, decisions...”

²⁴ <https://www.qualitycharters.org/research/quality-practice-project/practices-that-matter/authorizer-culture-characteristics/>



Such authorizers,

“Create and use protocols and processes that allow for nuanced discussions and collect numerous qualitative and quantitative data to inform and justify decisions with evidence.”

It is important that authorizing bodies cultivate professional judgment through discussions, retreats, and annual re-norming exercises so that everyone in the office has the same sense of what “good” looks like. In the case of alternative charter schools, that judgment can be tested because “good” work may have different contours from that found in standard schools. Extra care must be taken to assure that staff, consultants, and site visitors agree on the meaning and weight of metrics. Content experts should be enlisted to help guide the discussions.



Appendix A: A-GAME Project Team

The National Charter Schools Institute

With its wealth of experience working with authorizers and their charter schools to ease communication and compliance needs, the National Charter Schools Institute contributes expert knowledge on the context and constraints authorizers operate within, and the pain points that often exist between charter schools and their authorizers when it comes to agreeing on contract terms and meeting annual reporting requirements. Leading this work is [Naomi Rubin DeVeaux](#).

Momentum Strategy & Research

As researchers and experts in the field of alternative education measurement and performance, Momentum brings to the group its experience in assisting schools, districts, charter authorizers, and state departments of education in developing measures, metrics, and frameworks of accountability. In addition, Momentum brings to the table a bevy of data from their Alternative School, Performance, and Policy database to inform discussions about the accuracy of measurement and typical performance outcomes for alternative schools (including charter and non-charter alternative school data). Leading this work is [Dr. Jody Ernst](#).

Nelson Smith

Nelson Smith has held leadership positions in education policy for more than 30 years. In addition to serving as the first President and CEO of the National Alliance for Public Charter Schools, Nelson has served as Senior Advisor to the National Association of Charter School Authorizers; the first Executive Director of the District of Columbia Public Charter School Board; Vice President for Education and Workforce Development at the New York City Partnership; and Director of Programs for the Improvement of Practice at the U.S. Department of Education. He has taught at the Harvard Graduate School of Education and has written extensively about education reform issues including alternative charter school accountability and oversight of virtual charters.

While a senior advisor to the National Association of Charter School Authorizers, Nelson convened an Alternative Charter School Work Group, which resulted in the report, [Anecdotes Aren't Enough: An Evidence Based Approach to Accountability for Alternative Charter Schools](#).



Appendix B: The National Authorizer Leadership Team (NALT)

Organization	Authorizer Type	# Charter Schools (2018-19)	# AEC Charter Schools* (2018-19)
Alameda County Office of Education	County Office of Education	11	3
Audubon Center of the North Woods	Non-profit	35	6
Buckeye Community Hope	Non-profit	49	9
DC Public Charter School Board	Independent Charter Board	120	8
Central Michigan University	Higher Education Institution	58	7
Chicago Public Schools	Public School District	125	25
Ferris State University	Higher Education Institution	19	3
Hillsborough County Public Schools	Public School District	49	5
Nevada State Charter School Authority	Independent Charter School Board	28	1
SUNY Charter Schools Institute	Higher Education Institution	200	3
New York State Department of Education	State Department of Education	87	6

*Schools, or campuses.



Appendix C: The National Advisory Committee

Name	Title	Organization	State(s)
Rob Kimball	Associate VP for Charter Schools	Grand Valley State University	Michigan
Corey Loomis	Charter Schools Director	Riverside County Office of Education	California
Greta Roskam	Former Director	Gordon Bernell Charter School, NM Coalition of Charter Schools	New Mexico
Dan Quisenberry	President	MI Association of Public School Academies	Michigan
Lenny Schafer	Executive Director	Ohio Council for Community Schools	Ohio
Tony Simmons	Executive Director	High School for the Recording Arts	Minnesota, California
Amy Schlessman	Founding President	AZ Alternative Education Consortium	Arizona
Bill Toomey	Executive Vice President	Learn 4 Life Concept Charter Schools	California, Ohio, Michigan



Appendix D: Average AEC Performance on Common Accountability Metrics

This appendix includes average AEC outcomes based on publicly available data sources, such as state department of education web pages. These data are summarized from collections that Momentum conducted prior to the A-GAME projects inception. More up-to-date data is being collected for the A-GAME project and will be provided on the [A-GAME web page](#).

In each table, data presented is based on states that report outcomes using the same metrics (such as adjusted cohort graduation rates for students receiving standard diplomas), but this does not take into account differences in the difficulty of the assessments from state to state and/or differences in state standards and/or graduation requirements. Therefore, comparisons of one state to another is not advised.

Table D1. 3-Year Average Proficiency Rates Among AECs in Arizona, New Mexico, Ohio, and Texas, Compared to the Statewide Average of All Schools in the Respective States^a

State (Years)	Reading/ELA			Math		
	Average Annual AEC Count	3-Year Average Proficient & Above Rate for AECs	Proficient & Above Rate for all Schools ^b	Average Annual AEC Count	3-Year Average Proficient & Above Rate for AECs	Proficient & Above Rate for all Schools ^b
Arizona (2016-2018)	119	13%	40%	122	14%	42%
New Mexico (2017-2018) ^c	34	10%	39%	33	6%	21%
Ohio (2015-2017)	42	75%	62%	43	62%	60%
Texas (2015-2017)	17	59%	67%	13	60%	71%

a. The statewide average corresponds to the latest year in the AEC's three-year average (i.e., 2018 for Arizona and New Mexico and 2017 for Ohio and Texas)

b. Using the states' definitions of proficiency and above.

c. Due to a change in assessment in 2016, New Mexico's average based on only two years.



Table D. 2. 3-Year Average of 4 and 5-Year Adjusted Cohort Graduations Rates, among AECs, Across Multiple States

State (Classes of)	Average Annual AEC Count	Average 4-Year Rate	Average 5-Year Rate	Difference between 4- and 5-yr rates (in percentage Points)
Arizona 2014-2016 ^a	126	38%	50%	+12
California 2014-2016	627	46%	n/a	n/a
Ohio 2014-2016 ^a	79	25%	31%	+6
New Mexico 2014-2016 ^a	33	34%	39%	+5
New York 2013-2015	21	21%	39%	+18
Texas 2013-2015	229	57%	65%	+8

a. The five-year rate is for two of the same three class.

Table D3. Average Percent of Possible Membership Days Attended for AECs in Colorado, Ohio, and Texas

State (Year)	Percent of All Membership Days Attended	Total Alternative School Membership Days	Total Alternative School Days Attended	# of AECs w/ Reported Data
CO (2016-2017)	79.06%	2,067,565	1,634,632	77
CO (2014-2015)	81.23%	1,959,546	1,591,820	75
CO (2013-2014)	80.30%	1,868,654	1,500,608	71
OH (2014-2015)	77.64%	9,001,914	6,988,894	85
OH (2015-2016)	77.78%	9,426,100	7,331,534	91
TX (2013-2014)	86.25%	5,455,135	4,705,236	265
TX (2014-2015)	86.30%	5,966,550	5,148,991	280
Average	80.85%	35,745,464	28,901,714	944



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