

AGENDA ITEM EXECUTIVE SUMMARY: Proposed Revisions to the Academic Performance Eligibility Criteria for Expansions

Issue

Consideration to modify the academic performance eligibility criteria for expansion requests in fiscal year 2020, including replication and transfer applications, in the Board's Academic Performance Framework and Guidance. The proposed change will impact charter holders that operate a charter school identified for comprehensive support and improvement (CSI).

The following proposal was opened for public comment on October 18, 2019. The window for public comment closed on November 7, 2019.

At the Board's October 15, 2019 meeting, Board staff proposed the following:

1. Determine academic performance eligibility for all expansion requests, based on a school's letter grade of "A", "B", or "C" and on confirmation that the school:
 - a. Is not designated for Comprehensive Support and Improvement due to low achievement; and
 - b. Receives a rating of 66% or higher on the *On-Track to Graduate* measure.

At the October meeting, the Board directed staff to open this proposal for public comment and consider other eligibility measures for non-alternative charter schools that do not use the *On-Track to Graduate* measure.

Background

In fiscal year 2018, the Arizona Department of Education identified schools for comprehensive support and improvement based on Spring 2017 AzMERIT student data and Graduation Rates. The criteria to be identified as a CSI school as required by the Every Student Succeeds Act is:

- CSI Low Graduation Rate = All schools with a five-year cohort graduation rate of less than or equal to two-thirds, and/or
- CSI Low Achievement = Title I schools with student proficiency/percent passing, English Language Arts and Math combined, in the lowest 5% on the statewide assessment¹ plus all "F" schools.

Second Opportunity for Public Comment

In accordance with the Board's Procedures for Rule and Policy Adoption, the proposed modifications were open for public comment. The communication was circulated through the Board's website, newsletter and social media.

Public Comment Summary

Board staff received written feedback by the organizations/individuals identified below and included those comments with these meeting materials (*see Appendix A: Combined Public Comment*). Each can be accessed using the links provided in bold font.

- Arizona Alternative Education Consortium (**AAEC**)
- Arizona Connections Academy (**ACA**)

¹ The bottom 5% cut score is 13% combined proficiency/passing rate for identification in 2017.



- Dr. Kinghorn
- Ombudsman Charter Schools (OCS)

Many of the comments are in support of the proposal made at the October 15, 2019 Board meeting. A separate comment addresses distance learning schools that have not been issued an A-F letter grade since fiscal year 2014.

Proposed Policy

Based on public comment and feedback from stakeholders, Board staff is proposing to remove the school improvement designation measure from the eligibility criteria for expansion requests. The proposed eligibility criteria would make a charter holder eligible to submit an expansion request if:

1. 75 percent or more of schools under its charter have an “A”, “B”, or “C” letter grade in the most recent fiscal year that state achievement profiles are available for the type of school operated by the charter holder.
2. Either of the following is true:
 - a. 75 percent or more of all Associated Schools have an “A”, “B”, or “C” letter grade in the most recent fiscal year that state achievement profiles are available for the type of school operated by the Associated Charter; or
 - b. If one or more Associated Schools are excluded for academic performance purposes, 100 percent of the remaining Associated Schools have an “A”, “B”, or “C” letter in the most recent fiscal year that state achievement profiles are available for the type of school operated by the Associated Charter.

In addition to the above criteria, a charter holder requesting a replication or transfer charter is eligible to submit the request if the school being replicated or transferred to its own charter has an “A” or “B” letter grade in each of the two most recent fiscal years.

Appendix A:
Combined Public Comment



Johanna Medina <johanna.medina@asbcs.az.gov>

Fwd: Grad Rate and Expansion Eligibility

1 message

Charter School Board - ASBCS

<charterschoolboard@asbcs.az.gov>

Thu, Oct 24, 2019 at
2:08 PM

To: Johanna Medina <johanna.medina@asbcs.az.gov>

Charter School Board Staff



**Arizona State Board for Charter
Schools**

**P.O. Box 18328, Phoenix, Arizona
85005**

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asbcsaz](http://www.facebook.com/asbcsaz)**

**Newsletter: [https://asbcs.az.
gov/news-events](https://asbcs.az.gov/news-events)**

----- Forwarded message -----

From: **Binky Michele Jones** <bjones@ombudsman.com>

Date: Thu, Oct 24, 2019 at 1:46 PM

Subject: Grad Rate and Expansion Eligibility

To: charterschoolboard@asbcs.az.gov <charterschoolboard@asbcs.az.gov>

Binky Michele Jones

bjones@ombudsman.com

Ombudsman Charter Schools

Ombudsman Charter Schools supports the use of the On-Track to Graduate % from the AZ Alternative School Accountability Model for expansion eligibility. This category is an appropriate measure of students graduating from Alternative Schools in Arizona. Utilizing Cohort Grad Rate is not an appropriate measure as many students are beyond the typical four and five year cohorts represented in the Comprehensive Support and Intervention criteria.

Sincerely,

Binky Michele Jones

Regional Vice President, Ombudsman Educational Services

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Johanna Medina <johanna.medina@asbcs.az.gov>

Arizona Connections Academy Public Comment

1 message

Heather Noto <hnoto@aca.connectionsacademy.org> Tue, Nov 5, 2019 at 8:49 AM
To: johanna.medina@asbcs.az.gov, "Sigmund, Eileen"
<eileen.sigmund@pearson.com>

Johanna,
It was a pleasure meeting you and having an opportunity to speak with you about the graduation rate issue relating to online programs. I am attaching ACA's public comment and request you provide it to the board for their review and consideration.

Thanks again for your help. :)

Heather Noto

Principal

[Arizona Connections Academy](#)

480-941-6577



A student-focused school creating positive partnerships to ensure student growth and learning.



Public Comment on Academic Eligibility Criteria for Expansions.pdf
291K

Public Comment on Academic Eligibility Criteria for Expansions

Arizona Connections Academy (ACA) provides a high quality, full-time virtual option to children of all backgrounds. ACA serves students state-wide who are currently underserved. Our population includes students who are competitive athletes, medically homebound, bullied, homeschooled, have special needs, or those who simply require a flexible schedule. Our diverse student body includes students who are far ahead or behind their peers and those living in rural communities - all of whom need the certified teachers and rigorous curriculum we provide.

We hereby submit a public comment on the academic criteria for expansion. Annually, ACA meets our enrollment cap of 2,500 students and would like the ability to serve additional students who are wait-listed. However, ACA was recently identified as a Comprehensive Support and Improvement school as our four-year graduation rate is below ESSA requirements of 67%: which is the only reason for inclusion in Comprehensive Support and Improvement.

We are asking ASBCS to consider allowing ACA an exception to the enrollment cap expansion moratorium on schools in CSI for the following reasons:

- ACA serves a unique population. Students come to our schools for specific reasons and many are only planning to be enrolled for a short time. Many high school students enroll late, behind in credits, with a history of poor school performance.
- Our graduation rates are increasing annually. From 2017 to 2019, Arizona Connections graduation rate increased **10 percentage points** from 42.63% to 52.79%.
- Graduation rates may be higher as Arizona does not release mobility data and has issues in tracking student withdrawals as explained in the next section.
- AOI schools have not been given letter grade ratings because the state has yet to agree on a system for AOI schools.
- Arizona has previously and consistently provided schools with funding and awards based on previous year letter grades (i.e. Results-based funding awarded to schools based on student test scores and later based on prior-year letter grades.)
- Based on prior letter grades on the virtual framework, Arizona Connections Academy would meet the Authorizer's expectations as the school earned two C's (2012 & 2013) and then a B-rating (2014).

Respectfully, ACA submits a public comment asking for an exception to the Board's rule on the academic criteria for expansion and to allow ACA's expansion request to move forward based on its prior letter grades which meet this Board's performance metrics; improved graduation rates; and significantly high withdrawal rate which may ACA's graduation rate.

Student Withdrawals

We differ from many traditional brick-and-mortar schools because students come in and out of our school, depending on their educational needs. ACA continues to see a **high mobility rate** in our high school population. Many choose to attend for a semester or a year and then withdraw prior to the end of their senior year.

ACA has procedures in place to capture the next school information so that these students are removed from our denominator, and no longer counted as non-graduates. However, some students are not removed due to lack of information provided to the school, and then these remain in our cohort and count against our graduation rates.

The cohort is based on students that entered 9th grade in a given year, but that does not mean they were all at ACA in 9th grade. For example, when a student enrolls in ACA for their 2nd year of high school, independent of where that student is with credits, the student is counted as entering ACA 9th grade for the prior year and counted as part of that 9th-grade cohort.

These withdrawals reflect students that withdrew from ACA at some point in their high school career but stayed in ACA's cohort because you cannot submit documentation if a student fails to tell you where they go. Frankly, it is a low probability that students who withdraw drop out of high school, so these withdrawal numbers most likely reflect students that should have been removed from the cohort but never were removed.

It is likely that this is a contributing factor to the graduation rate being under the 67% ESSA threshold. While we take responsibility for tracking students, our numbers of withdrawals are significantly high and thus have a significant impact on the graduation rate. Based on an analysis of students that were classified as non-graduates but had withdrawn from ACA prior to the end of their Senior year, we estimate the impact of these withdrawals as follows:

- Class of 2018: Graduation rate from 49.21% to at least 63.51% - 69.12% (a 14-20 percentage point impact)
- Class of 2019: Graduation rate from 52.79% to at least 65.00% - 71.23% (a 12-19 percentage point impact)

Thank you for allowing us to submit our public comment. Please consider allowing Arizona Connections Academy to increase its enrollment cap. Our main priority is to continue to provide a rigorous and high-quality virtual option to students across the state of Arizona. We will be working closely with the Arizona Department of Education to find ways to better track student withdrawals, and this, alongside our efforts to improve student learning, will result in an increased graduation rate and a greater number of students who successfully earn a high school diploma.



Johanna Medina <johanna.medina@asbcs.az.gov>

Fwd: Public Comment on Academic Eligibility for Expansion Requests Recommendation

1 message

Charter School Board - ASBCS

<charterschoolboard@asbcs.az.gov>

To: Johanna Medina <johanna.medina@asbcs.az.gov>

Wed, Nov 6, 2019 at

2:01 PM

Charter School Board Staff



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From: **Arizona Alt Ed Consortium** <az.aec2011@gmail.com>

Date: Wed, Nov 6, 2019 at 12:41 PM

Subject: Public Comment on Academic Eligibility for Expansion Requests Recommendation

To: <charterschoolboard@asbcs.az.gov>

The Arizona Alternative Education Consortium supports using 66% or higher as measured by On-Track to Graduate in the Arizona alternative high school framework for expansion eligibility of charter alternative high schools. Many state interpretations of ESSA do not provide flexibility for alternative schools, as Arizona does within state accountability. We look forward to further discussion of ASBCS' Academic Framework as Federal School Accountability, specifically School Improvement designation, may not be appropriate for charters that have alternative school designation.

Respectfully submitted,

Kellie Burns, President

Sue Durkin, President Elect

Amy Schlessman, Past President

Tim Smith, Secretary/Treasurer

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Arizona Alternative Education Consortium
Advocate, Educate, Collaborate

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Johanna Medina <johanna.medina@asbcs.az.gov>

Fwd: On-Track to Graduate measure opinion

1 message

Charter School Board - ASBCS

<charterschoolboard@asbcs.az.gov>

Thu, Nov 7, 2019 at
1:29 PM

To: Johanna Medina <johanna.medina@asbcs.az.gov>

Charter School Board Staff



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From: **Dr. Kinghorn** <drkinghorn@rosemanagement.com>

Date: Thu, Nov 7, 2019 at 11:54 AM

Subject: On-Track to Graduate measure opinion

To: charterschoolboard@asbcs.az.gov <charterschoolboard@asbcs.az.gov>

I support using 66% or higher as measured by On-Track to Graduate for expansion eligibility of charter alternative high schools. Many state interpretations of ESSA do not provide flexibility for alternative schools, as AZ does within state accountability. I look forward to further discussion of ASBCS' Academic

Framework as Federal School Accountability, specifically School Improvement designation, is not appropriate for charters that have alternative school designation.

Dr. Eugene Kinghorn



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