

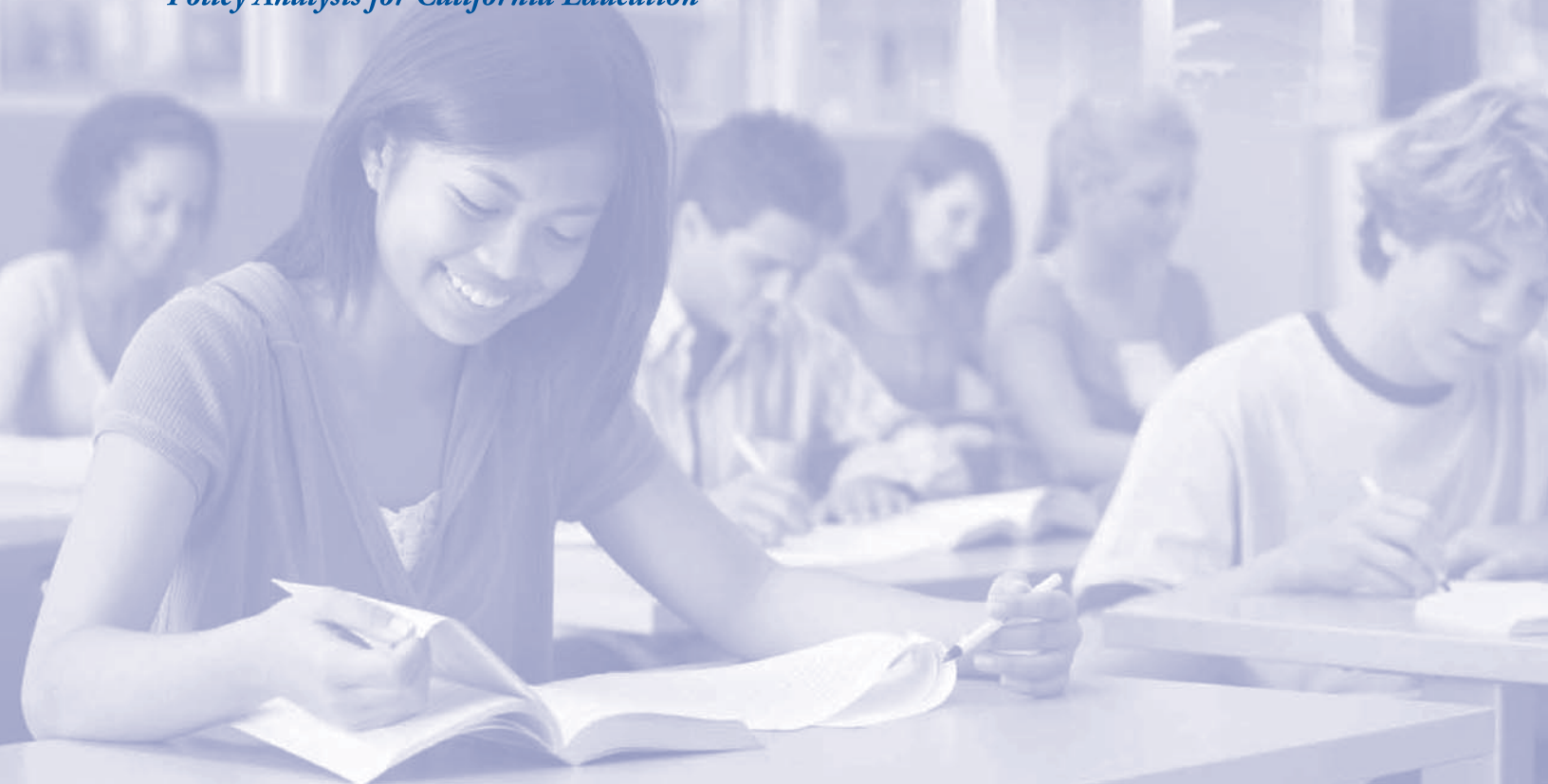
Continuous  
Improvement Series

# Accountability for Alternative Schools in California

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February 2017

 **PACE**  
*Policy Analysis for California Education*



## Continuous Improvement Series

Policymakers and educators at all levels of the system are wrestling with the virtually simultaneous implementation of four radically new and promising policy initiatives: the Common Core State Standards (CCSS); computer adaptive assessments developed by the Smarter Balance Assessment Consortium; the Local Control Funding Formula (LCFF); and a new accountability system that focuses on Local Control Accountability Plans (LCAPs) and an evaluation rubric rather than the traditional Academic Performance Index (API) scores. Few if any local actors have access to the kind of research-based information and guidance that PACE has provided California policymakers for more than 30 years. The PACE Continuous Improvement (CI) series provides California's education leaders timely practice-based evidence and strategies to drive continuous improvement in the performance of schools and students, by reviewing field research and identifying promising practices that are underway.

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## I. California Overview

California’s alternative education options for youth vulnerable to dropping out of school have been established at different historical points and for different student age and target populations. For purposes of this brief, we define an “alternative school” as belonging to one of six legislatively authorized types of public (non-charter) schools that meet the definitions of the Alternative School Accountability Model (ASAM).<sup>i</sup> These schools are operated by different local agencies – school districts, county school boards, or juvenile justice agencies and the courts –and governed by overlapping and sometimes legislatively superseded or otherwise inoperative portions of the state Education Code. Currently, the California Department of Education (CDE) is considering the development of a new accountability system for alternative schools that aligns with Local Control Accountability Plans (LCAP) for all public schools.

The CDE identifies almost 800 public alternative schools across the state (predominantly high schools) designed to meet the needs of credit-deficient and other youth vulnerable to dropping out before completing the minimum requirements for a regular high school diploma.<sup>ii</sup> California law contemplates more intensive services and accelerated credit accrual strategies in these schools so that students who are vulnerable to dropping out might have a renewed opportunity to “complete the required academic courses of instruction to graduate from high school.”<sup>iii</sup> In a recent review, however, the California Legislative Analyst’s Office (LAO) concluded that the state’s current school accountability system fails to adequately address alternative schools insofar as it neither establishes clear long-term objectives nor sets relevant shorter-term performance expectations for these schools. As a consequence, the CDE currently has no authoritative standards for effectively assessing school or district-level alternative school performance, for identifying alternative schools that may not be serving students well, or for providing those schools with appropriate supports and incentives for improvement.<sup>iv</sup>

### Size and Demography

The LAO estimates that almost 210,000 California high school students enrolled in an alternative school for some period of time during the 2013-14 academic school year. Of these youth, almost half (103,793)

were in continuation high schools that serve youth over the age of 16. These numbers suggest that about seven percent of California public (non-charter) students in grades 10-12 are enrolled in alternative continuation schools, but the share of students could easily approach 10 percent if students enrolled in district and county Community Day and Court Schools are included. Despite the fact that very large numbers of students are enrolled in alternative programs, confirming the size and demographic features of alternative school enrollments is virtually impossible, for two main reasons.

First, participation in the ASAM system is voluntary. Consequently, the number of alternative schools identified by the CDE likely under-estimates the total number of ASAM-eligible schools actually operated by local agencies.<sup>v</sup> Second, because alternative school students are highly mobile (both within and across districts and counties), the usual student census counts generally under-estimate the total unduplicated number of students served by individual alternative schools over the course of a given year. The CDE regularly collected continuous enrollment counts for all ASAM schools between 2000 and 2009, but this data collection was discontinued as a result of budget cuts beginning with the 2010-11 school year.<sup>vi</sup> The CDE nevertheless acknowledges that the actual number of students served by ASAM alternative schools is at least twice as large as the reported census day enrollment count.<sup>vii</sup>

## Highly Vulnerable Youth

The size and scope of the alternative school sector make clear that these schools are a central element in the state's drop-out prevention strategy, yet the available data suggests that alternative school students face steep challenges to graduation. The most common attribute across students in the various types of alternative schools is that most have reached age 16 lacking sufficient academic credits to remain on track to graduate with their age cohort. As well, many are highly vulnerable with multiple risk factors, learning barriers and a great deal of turbulence in their lives. One 2008 study, for example, drew on statewide data from the California Healthy Kids Survey to show that rates of regular and heavy alcohol and drug use (including use at school) were at least two times higher among continuation school students than 11th-grade students in traditional high schools. Continuation students were also about three times more likely than among 11th graders statewide to have been in four or more physical fights at school in the 12 months preceding the survey, as well as more likely to be physically victimized in and out of school. Nine percent reported being threatened or injured with a weapon more than once, over double the rate of 11th graders statewide (4 percent).<sup>viii</sup> As foster youth enrollments have begun to be publicly reported in the CDE's *DataQuest* system, some school districts are beginning to report that a disproportionately high percentage of their foster youth over age 16 are enrolled in alternative school settings. Most recently, the LAO confirmed that alternative schools enroll significantly higher proportions of black, Latino, and English learner students than are enrolled in the state's traditional public high schools.<sup>ix</sup>

## Alternative School Performance Accountability Since 2001

As a formal matter, alternative schools are subject to the same state and federal data reporting requirements as traditional schools, including aggregate and sub-group student performance on standardized test scores and high school graduation rates. This single-standard system, however, was not what the California legislature originally intended. Instead, the 1999 Public Schools Accountability Act (PSAA) required the CDE to "develop an alternative accountability system for ...alternative schools serving high-risk pupils, including continuation high schools

and...opportunity schools" as well as county and district community day schools.<sup>x</sup> The CDE and State Board eventually approved the ASAM to articulate sector-specific performance standards for alternative schools, but the ASAM system was never fully implemented, in large part because the intervening federal No Child Left Behind Act of 2001 required that alternative schools must meet the same Adequate Yearly Progress (AYP) criteria as all other schools. The ASAM standards thus became voluntary.

In 2008, the State Board of Education (SBE) again addressed accountability for alternative schools and approved a conceptual framework for strengthening and redesigning the existing ASAM. The Governor vetoed funding for the proposed data collection and reporting of the revised ASAM program, however, as well as for identifying and disseminating best practices of alternative schools. As a result, reporting on ASAM measures by participating alternative schools was discontinued altogether beginning with the 2010-11 school year.<sup>xi</sup> Since that time, the now discontinued state Academic Performance Index (API) and federal Adequate Yearly Progress (AYP) have been the only formal standards applied to alternative schools.

After the ASAM reforms were paused, the Legislature passed and the Governor signed AB 570 in 2013, in an effort to create incentives for districts to move more affirmatively into the accountability gap. Under AB 570, school boards were, for the first time, required to “establish and adopt policies and procedures governing the identification, placement, and intake” for students in continuation schools. These new procedural requirements were intended to put districts on notice that local policies regarding schools in alternative settings must, at a minimum, be in writing, and be made available for public scrutiny.<sup>xii</sup> To date, no research has been done to ascertain how the CDE and local districts have implemented AB 570 or how AB 570’s procedural requirements have shaped local alternative school operations.

Numerous analysts have concluded that existing state and federal accountability measures and data collection requirements applicable to traditional schools do not provide the information necessary to identify how well alternative schools are serving students, nor do they provide incentives for schools and districts to innovate and improve.<sup>xiii</sup> Some analysts argue that California needs a state data system that would make it possible to construct a comparison group for students in alternative schools.<sup>xiv</sup> Presumably, such a comparison group would allow analysts to assess alternative school student performance relative to students in traditional schools *who have similar prior performance and behavioral characteristics* (e.g., credit deficient students and/or who have poor attendance records). In the absence of a data system that enabled this capacity, school-level performance comparisons between alternative and traditional schools would be highly misleading.

Moreover, the LAO and others have pointed out that an accountability system that banks on progress relative to standard assessments does not provide effective information about these schools. The LAO found, for example, that between 2009 and 2013 about half of all California alternative schools did not have reportable API scores, usually because they did not have a sufficient number of students who met the continuous enrollment rules for including their standard assessments in the API calculations.<sup>xv</sup> Likewise, in accord with the LAO, a recent PPIC report concluded that the four-year graduation rate calculation—and even the five and six year calculations—might not provide a fair measure of alternative school performance because few students attend these programs for four years. Graduation rates ultimately make alternative schools accountable for the academic deficits created while students attended regular high schools.<sup>xvi</sup>

## II. How have other States Approached Alternative School Accountability?

In this section, we consider how other states are approaching accountability for alternative schools. We focus our attention on Colorado, Kentucky, New York, North Carolina, New Jersey, Oregon and Wisconsin, because these states all use multiple indicators including school-level performance on state tests as well as indicators of enrollment, attendance, completion, and graduation in their accountability systems. These state systems have two key features in common. First, they allow alternative schools to select the indicators that local school leaders believe are most appropriate for their education program or school. In addition, these states hold schools accountable for improvement and/or performance trends rather than to absolute performance standards.

### Colorado

Colorado has an annual qualification process for the 84 schools that are designated as alternative education campuses (AECs). AECs are held accountable to four domains of performance: (1) academic achievement, (2) academic growth, (3) student engagement and (4) postsecondary and workforce readiness (PWR). There are three key differences between the performance indicators that are measured in traditional high schools and alternative schools. The first is that the accountability system for alternative high schools includes a measurement domain for student engagement that is not applied to traditional high schools. Second, the four performance domains are weighted differently in the scoring calculation. For alternative schools, academic growth is weighted at 35 percent, PWR at 30 percent, achievement at 15 percent and student engagement at 20 percent. For traditional schools the corresponding weights are 40 percent for academic growth, 40 percent for PWR, and 20 percent for achievement (with no student engagement domain).<sup>xvii</sup> Third, alternative schools have the flexibility to respond to state accountability requirements by selecting from an additional set of optional measures. For example, in traditional schools the PWR indicator must be measured by completion rates (best of 4, 5, 6 or 7-year graduation rate), a dropout rate and the Colorado ACT average scores. Alternative schools can supplement these compulsory measures by including any of five optional measures: credit/course completion; workforce readiness skills; post-completion success rates; successful transitions to non-degree granting schools; or graduation rate. State leaders believe these alternative measures more accurately reflect the educational mission and experiences of students in AECs.<sup>xviii</sup>

### Kentucky

In the 2011-2012 school year approximately 21,578 students were enrolled in Kentucky alternative programs. Alternative education programs in Kentucky are defined as programs “that exist to meet the needs of students that cannot be addressed in a traditional classroom setting but through the assignment of students to alternative classrooms, centers, or campuses that are designed to remediate academic performance, improve behavior, or provide an enhanced learning experience.”<sup>xix</sup> A new ESSA-aligned accountability system for Kentucky is expected to be implemented in the 2017-18 school year. As they prepare for their new system, Kentucky leaders have declared that “alternative school programs should be held accountab[le for student outcomes], along with the districts that send these students.”<sup>xx</sup> The final system



may require sending districts/schools to report the number/demographics of students referred to alternative programs. Under draft proposals, five key accountability domains are proposed for all schools: (1) Proficiency/Postsecondary Readiness, (2) English Language Proficiency, (3) High School Graduation, (4) Academic Growth, (5) School Quality/Student Success. Kentucky will also allow for the inclusion of local indicators, as California does. The Kentucky Department of Education has also indicated that they will develop multiple models for assessment and accountability to reflect the different types of alternative schools. For example, students held in detention centers will not be held accountable for performance on state standardized academic assessments.

## New York

The New York System of Accountability for Student Success (SASS) requires districts that operate Alternative High School Equivalency Programs (AHSEP) or High School Equivalency Programs (HSEP) to report performance data for students in these alternative programs. Performance measures and standards used for AHSEP and HSEP are: (1) 56 percent or more of students successfully pass the GED test (GED Success Rate); (2) 64 percent or more of students, upon post-testing, score a higher literacy level than during pre-test, as defined in the National Reporting System (NRS) for Adult Education (Student Success Rate); and (3) Dropout Rate no greater than 31 percent.<sup>xxi</sup>

## North Carolina

Accountability policies for alternative programs and schools in North Carolina were first established in 1999. Since then, the State Board of Education in North Carolina has revised the procedures in place for alternative learning programs, including the development of alternative learning program accountability framework. Alternative schools participate in North Carolina's Alternative School's Accountability Model and are evaluated as follows<sup>xxii</sup>:

- (1) 20 percent Student Persistence (defined as the percent of alternative students who remain enrolled in any North Carolina public school through the end of the school year),
- (2) 20 percent School Achievement (including state standard assessment scores, ACT scores, and graduation rates)
- (3) 60 percent Academic Growth (calculated using a state-developed alternative growth model in conjunction with the SAS® EVAAS™ (Education Value-Added Assessment System).<sup>xxiii</sup>

## Other States

New Jersey, Oregon and Wisconsin have different curriculum standards or alternative graduation options for students in alternative education programs, but they nevertheless hold alternative programs and traditional high schools to the same academic performance standards in the accountability system. For example, in lieu of a cohort graduation rate, Oregon uses a one-year graduation rate for seniors as an accountability measure for alternative settings (AIR 2016<sup>xxiv</sup>). The one-year rate measures the percent of graduation-eligible seniors who persist and successfully meet the requirements for graduation by the end of the school year.<sup>xxv</sup>

### III. Consideration's for California Policymakers Going Forward

In developing an accountability system for California's alternative schools, the State Board of Education (SBE) may consider indicators or metrics adopted by other states that align with or can be nested within the design of the evolving statewide system for all public schools. In this section, we review that evolving state accountability system as it may inform options for alternative schools.

#### Alignment with the LCFF evaluation Rubrics

Both the Local Control Funding Formula (LCFF) and the federal Every Student Succeeds Act (ESSA) shift decision-making authority to local actors and require a more comprehensive approach to assessing school performance that includes both academic and non-academic measures. The SBE has been working to develop an integrated local, state and federal accountability and continuous improvement system that is consistent with these new policy frameworks. The SBE is currently developing evaluation rubrics to measure local progress toward state priorities, with the understanding that the rubrics will evolve over time as additional indicators become available.

The evaluation rubrics design currently includes the following state indicators, which apply at the LEA and school level.

- **Academic Indicator:** Student test scores on English Language Arts (ELA) and Math, including a measure of individual student growth for grades 3-8, when feasible, and results on the California Science Test (CAST) aligned assessment, when available;
- **English-learner Indicator:** Progress of English learners toward English language proficiency;
- **High school graduation rate**
- **Suspension rates:** Suspension rates by grade span
- **College and Career Indicator (CCI):** combines Grade 11 test scores on ELA and Math and other measures of college and career readiness
- **Chronic absence** (when data become available)

By reporting performance on multiple measures that affect student performance across the eight LCFF priorities, California's new accountability system provides a more complete picture of what contributes to a positive educational experience for students. As other states have found, however, additional measures may be needed to fully capture the work of alternative schools and the needs and experiences of students in alternative settings. Indeed, the CDE requires County Offices of Education (COEs), which enroll significant numbers of students in alternative settings, to provide additional reporting on services and student outcomes for expelled students (COE Priority 9) and for foster youth (COE Priority 10).

#### Additional Measures for Alternative Schools

In reviewing the approaches taken by other states, and California's own experience with the ASAM, we identified several measures that would address many of the accountability gaps in the current federal and state approach to measuring the performance of alternative schools:

- *Indicators of School Connectedness.* Educators and policymakers are increasingly recognizing that for schools populated by credit-deficient and other students at risk of dropping out, a threshold objective is to focus on indicators of school connectedness. Measures such as



consistent attendance or punctuality are critical indicators of readiness to learn and academic reengagement.

- *Indicators of academic progress (achievement benchmarks).* California is already committed to measuring student academic growth on standardized assessments. However, many youth in alternative settings are performing at grade levels significantly below their peers. Educators in alternative settings must meet these students where they are academically and motivate accelerated academic progress. Relevant progress indicators or achievement benchmarks considered or adopted by other states include measures of accelerated credit accrual and promotion to the next grade.
- *Indicators of successful transitions short of a regular diploma.* Indicators considered or adopted by other states have included transitions back to a traditional school, to a GED program, or to post-secondary opportunities where students might continue their education. A one-year graduation rate for students categorized as “seniors” in alternative schools has also been used in Oregon. Alternative school leaders argue that given the high mobility of students in their schools, a one-year graduation rate is a fair indicator of student achievement.
- Using a one-year graduation rate for students classified as seniors (i.e., who have completed 75 percent of credits needed to graduate by the October census day of the year in question), adequately captures student achievement among a student group who might be continuously enrolled in an alternative setting.
- *Special Indicators for Vulnerable populations.* As noted previously, English Learners, Foster Youth, Adjudicated Youth and certain racial and ethnic groups are disproportionately assigned to alternative settings. Many states and local districts have developed specific progress and monitoring indicators for these groups of students, including potentially pregnant and parenting youth, lesbian, gay, bi-sexual or transgender youth (LGBT), or all students who meet a specific standard for credit deficiency.

Field research into “beating the odds” schools confirms that alternative schools that focus on school connectedness, academic progress, and successful post-secondary transitions measures and that establish clear identification, placement, induction, and monitoring procedures for all of their students *can* and often do provide important opportunities and resources for a vulnerable population of youth to succeed academically. Indeed, the proposed 2009 ASAM reforms were focused on these types of measures. A recent review from the American Institute for Research (AIR) has similarly found that readiness and learning growth were key indicators for youth in alternative settings (AIR 2016).<sup>xxvi</sup> In Table 1 we provide an example of how additional measures might be adapted or added to the LCAP design to meet the needs of alternative schools.

Table 1. Measurements for Engagement and Academic Progress in Alternative Education

California Traditional Schools	Alternative Schools
<p><b>Academic Indicator</b></p> <ul style="list-style-type: none"> <li>Combines student test scores on English Language Arts (ELA) and Math, including a measure of individual student growth for grades 3-8, when feasible, and results on the California Science Test (CAST) aligned assessment, when available</li> </ul>	<p><b>Additional Academic Indicators</b></p> <ul style="list-style-type: none"> <li>Percent of student proficiency in Reading, Math, Writing, Science</li> </ul> <p><b>Academic Progress (achievement benchmarks)</b></p> <ul style="list-style-type: none"> <li>Passing a state or subject-level test</li> <li>Promotion to the next grade or subject-level achievement</li> </ul>
<p><b>High School Graduation Rate</b></p> <ul style="list-style-type: none"> <li>Criteria range from 95 percent (considered “high” to 67 percent (considered “very poor”)<sup>xxvii</sup></li> </ul>	<p><b>Progress Towards Graduation</b></p> <ul style="list-style-type: none"> <li>Completion of graduation-required credits</li> <li>Completion of minimum course distribution requirements needed for graduation</li> <li>One-year graduation rate (Oregon model)</li> </ul>
<p><b>College and Career Indicator (CCI)</b></p> <ul style="list-style-type: none"> <li>Combines Grade 11 test scores on ELA and Math and other measures of college and career readiness</li> </ul>	<p><b>College and Career Readiness Successful Transitions</b></p> <ul style="list-style-type: none"> <li>GED completion rate</li> <li>Transfer to adult school</li> <li>Transition back to a traditional school, or other measure of successful transitions</li> </ul>
<p><b>Chronic Absence</b></p>	<p><b>School Connectedness</b></p> <ul style="list-style-type: none"> <li>Sustained daily attendance</li> <li>Student punctuality</li> <li>Student persistence or Annual Stabilization Rate (remaining in the same alternative school for a certain period of time such as a semester or 6 months)<sup>xxviii</sup></li> <li>Student re-engagement (drop-out recapture)</li> </ul>
<p><b>Vulnerable Populations/Sub-Groups</b></p> <ul style="list-style-type: none"> <li>English Learners</li> <li>Disadvantaged Youth</li> <li>Racial and Ethnic Groups</li> </ul>	<p><b>Additional Vulnerable Populations/Sub-groups<sup>xxix</sup></b></p> <ul style="list-style-type: none"> <li>Foster youth</li> <li>Adjudicated youth</li> <li>Pregnant and parenting</li> <li>LGBT youth</li> <li>Credit-deficient youth</li> </ul>

## Challenges and Opportunities

### Improved Data Collection

Alternative schools vary by setting, instructional format, authorizer and student demographics. Data collection procedures will need to be revised and strengthened to account for this variation if indicators are to be reliable and robust. In addition, alternative schools that have not been held accountable or have not voluntarily submitted data to the ASAM in prior years may require assistance to build reform capacity for school leaders, staff and teachers. For traditional school leaders and district policymakers, new accountability demands will require greater efforts to gather and use actionable data to promote goal-setting and enable a deeper understanding of the needs of the diverse student population in alternative programs.

### Model Practices for Implementing AB 570(2013) Procedural Safeguards

School Districts are required by AB 570 (2013) to establish written procedures for the identification and voluntary placement of youth into continuation schools. As previously noted, little is known about whether and how districts are complying with this requirement. The CDE could take a more supportive role by establishing model procedures and providing guidance on AB 570 implementation, including guidance on how districts can help parents to understand and participate in placement decisions. Prior studies have documented that student identification and placement into alternative schools is idiosyncratic across the state and often unmoored from consideration of student needs. Placement and intake practices vary greatly across districts, and often even across public alternative schools in the same school district.<sup>xxx</sup> California can play a central role in improving and defining the characteristics of alternative education programs through the development of model protocols that guide districts in establishing coherent student eligibility standards and procedures.

### Professional Development

Teachers and school leaders are challenged to embrace school change, to work with their colleagues to develop a cohesive vision of educational progress, and to foster a culture of professional accountability within their schools. But teachers and principals in alternative schools often report that they struggle to find professional development opportunities that are relevant to the unique facets of their work with abused or otherwise vulnerable youth. Additional guidance or access to information on best practices might advance continuous learning and improvement in the following categories:

- training in how to align performance-based credit accrual programs with state standards;
- training on how to effectively organize the school day and year to promote effective teacher practice and student persistence;
- guidance on the use of student achievement data to inform teacher practice or to identify sub-groups of students who might benefit from specific interventions;
- strategies for developing a supportive climate for learning in alternative settings; and
- skill development in identifying early warning signs of student disengagement.<sup>xxxi</sup>

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## Implementation and Technical Assistance

Although the LCAP process offers the hope that districts will explore multiple measures and approaches for assessing the performance of their alternative schools, the LAO found that “many districts and county offices of education neither set school-level performance targets nor provided school-level data” for their alternative schools, at least in the first year of LCAP implementation.<sup>xxxii</sup> This suggests that LEAs face a steep learning curve when it comes to accountability for alternative schools. Many will need technical assistance, including information about best practices and protocols for effective implementation. States like North Carolina, for example, help schools develop their accountability goals by providing sample protocols and guides to support continuous improvement.<sup>xxxiii</sup>

## New Legislation

Many provisions of the California Education Code respecting alternative schools were enacted prior to the establishment of the education reforms in 1999 and have never been reexamined to assure alignment with new educational goals and standards for all students. Section 48430 of the Education Code, for example, provides that continuation schools should provide “a program of instruction which emphasizes an occupational orientation or a work-study schedule.” Continuation schools are also reimbursed for an abbreviated 15 hours of instruction per student in a week (about a three-period day). This is consistent with the original design of an alternative option for students who wanted to “continue” their schooling while working part-time, or who needed a schedule that would facilitate finding a job. Today, however, there are very few jobs in the modern economy for 16-19 year-olds who lack a high school diploma. Moreover, the “occupational” emphasis in the Education Code implies a lower academic standard for continuation students, which is demonstrably at odds with more recent education reforms that strive to promote universal access to a rigorous academic curriculum and college and career readiness opportunities for all students. The legislature may need to reexamine the design of some authorizing legislation in order to provide clear signals and to clarify goals for alternative education options in California.

## Conclusion

Our review of the ASAM’s evolution and of the approaches to accountability for alternative schools adopted in other states suggests that there is a growing consensus that a strong accountability system should address the domains of learning, academic engagement, continued academic growth, and successful post-secondary transitions. Not surprisingly, there is less consensus about the specific metrics, indicators, and performance thresholds that should be included in such a system. Much will depend on whether state policymakers can build a broad consensus among education stakeholders in California about the goals and priorities for the education of some of the state’s most vulnerable youth. As California moves forward with the design and implementation of a radically new accountability system, the SBE and other policymakers must recognize and acknowledge the specific circumstances and needs of students enrolled in alternative programs. Failure to do so will place the futures of the state’s most vulnerable youth at even greater risk.

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## References

- <sup>i</sup> The six types of ASAM schools include **Continuation Schools** (*Education Code [EC] sections 48400 et seq.*); **District Community Day Schools** (*EC, sections 48660-48926*); **County Community Day Schools** (*EC, sections 48660-48926 and sections 1980-1986*); **Opportunity Schools** (*EC, sections 48640 and 48641*); **Juvenile Court Schools** (*EC, sections 48645-48645.6*); and **California Education Authority Schools, (Division of Juvenile Justice)** (*Welfare and Institutions Code, sections 1120-1125.5*).
- <sup>ii</sup> California Department of Education, “Active ASAM Schools,” Revised: September 22, 2016 and retrieved online at: <http://www.cde.ca.gov/ta/ac/am/>
- <sup>iii</sup> See, California Education Code, § 48430, *et seq.*, and § 51225.3.
- <sup>iv</sup> Legislative Analyst’s Office (2015). Next Steps for Improving State Accountability for Alternative Schools. (California Legislative Analyst’s Office (LAO), Sacramento, California) April, 2015.
- <sup>v</sup> As noted earlier, for example, the CDE reports enrolling 800 alternative schools in the ASAM for the 2016-17 school year. However, in years where data reporting under ASAM was mandatory, more than 1000 schools were enrolled in the ASAM.
- <sup>vi</sup> CAL EDFACTS (2016). *Alternative School Accountability Model*, CAL EDFACTS (CDE, Sacramento, CA). Retrieved at: <http://www.cde.ca.gov/ta/ac/am/cefasam.asp>
- <sup>vii</sup> See, CAL EDFACTS (2016). <http://www.cde.ca.gov/ta/ac/am/cefasam.asp>
- <sup>viii</sup> Ruiz de Velasco, et al., (2008). *Alternative Education Options: A Descriptive Study of California Continuation High Schools* (John W. Gardner Center, Stanford University, Palo Alto) at pp. 3-4.
- <sup>ix</sup> Legislative Analyst’s Office (2015), at pp. 7-8.
- <sup>x</sup> California *Education Code*, Section 52052 [h] (1999).
- <sup>xi</sup> See, e.g., “Information for alternative schools considering participation in the Alternative Schools Accountability Model (ASAM),” available at: [www.cde.ca.gov/ta/ac/am/considerpart.asp](http://www.cde.ca.gov/ta/ac/am/considerpart.asp)
- <sup>xii</sup> Assembly Bill No. 570, CHAPTER 365, amending Section 48432.3 of the Education Code, relating to continuation schools. [Approved by the Governor September 26, 2013.]
- <sup>xiii</sup> See, e.g., LAO (2015); Warren, Paul (2016) *Accountability for California’s Alternative Schools*, (Public Policy Institute of California, San Francisco, CA). May 2016; Ruiz de Velasco and McLaughlin (2012) *Raising the Bar Building Capacity: Driving Improvement in California’s Continuation High Schools* (John W. Gardner Center, Stanford University, Palo Alto); Ruiz de Velasco, et al., (2008).
- <sup>xiv</sup> See, e.g., Warren (2016).
- <sup>xv</sup> See, LAO (2015) at pp. 12-14; also Ruiz de Velasco, et al., (2008) at pp. 4-5 finding similar results for continuation high schools in the 2006-07 period.
- <sup>xvi</sup> Warren (2016) at p.9.
- <sup>xvii</sup> Center for Assessment Design Research and Evaluation (CADRE) (2016). “Recommendations from the Accountability Work Group for the Revised Colorado District and School Performance Frameworks.” Available at: <https://www.cde.state.co.us/accountability/recommendations-from-the-awg-for-the-revised-colorado-dpfs-and-spfs>
- <sup>xviii</sup> See, Colorado Department of Education, “Accountability for Alternative Education Campuses, Policy Guidance” (December 2016). Available at: [https://www.cde.state.co.us/accountability/policy\\_guidance\\_accountability\\_for\\_aecs](https://www.cde.state.co.us/accountability/policy_guidance_accountability_for_aecs);
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- <sup>xx</sup> See Kentucky Department of Education (2016). “November 2, 2016 Accountability Design Recommendations.” Author retrieved December 6, 2016 from: <http://education.ky.gov/CommOfEd/adv/Documents/Accountability%20Design%20Recommendations%20110216%20Steering%20Committee.pdf>
- <sup>xxi</sup> New York State Department of Education (2016). “ATP/TASC Application for the 2016-2017 School Year.” Retrieved from: <http://www.p12.nysed.gov/sss/ssae/AltEd/>
- <sup>xxii</sup> North Carolina State Board of Education Policy Manual (2016). Retrieved from: <http://sbepolicy.dpi.state.nc.us/policies/GCS-C-038.asp?pri=01&cat=C&pol=038&acr=GCS>
- <sup>xxiii</sup> North Carolina Alternative Schools’ Accountability Model Business Rules and Technical Notes



2015 – 16, Available at: <http://www.ncpublicschools.org/docs/accountability/reporting/altbsnsrsls16.pdf>

<sup>xxiv</sup> Deeds, Carinne and Zachary Malter (2016). What Can States Learn About College and Career Readiness Accountability from Alternative Schools. (CCRS Center at American Institute of Research, DC).

<sup>xxv</sup> In Oregon, graduate-eligible students are those who, at the beginning of a given academic year, are deemed to have accumulated sufficient credits (e.g., 75% of high school credits required to graduate) to be considered on-track to graduate by the end of that same academic year.

<sup>xxvi</sup> Deeds and Malter (2016).

<sup>xxvii</sup> See CDE retrieved from: <http://www.cde.ca.gov/nr/ne/yr16/yr16rel59.asp>

<sup>xxviii</sup> Alternative education settings (known as option schools) in the Chicago Public School system apply an annual stabilization rate measured by the percent of stable students who are enrolled at the end of the school year, completed the program, or successfully transitioned to another CPS school. See Deeds and Malter (2016) at p.5.

<sup>xxix</sup> California may consider additional procedural safeguards such as written identification, placement, induction, and progress monitoring procedures for youth placed in alternative settings (AB 570).

<sup>xxx</sup> Ruiz de Velasco and McLaughlin (2012) at p.11.

<sup>xxxi</sup> Ruiz de Velasco and McLaughlin (2012) at p.19.

<sup>xxxii</sup> Legislative Analyst's Office (2015), at p.15.

<sup>xxxiii</sup> An example of a model standards and procedures technical assistance document can be found online at: <http://www.ncpublicschools.org/alp/develop/>



<http://edpolicyinca.org>