# MEMORANDUM

TO:         MEMBERS, STATE BOARD OF EDUCATION

FROM:       ACCOUNTABILITY & ASSESSMENTS DIVISION

SUBJECT:    PRESENTATION, DISCUSSION, AND CONSIDERATION REGARDING 2013-2014
            ACCOUNTABILITY DETERMINATIONS FOR SCHOOLS WITH PENDING LABELS

DATE:       MARCH 9, 2015

This memorandum provides information underlying the recommendation to adopt new criteria for 2013-2014 accountability determinations for all schools with pending achievement profiles. Under authority described in ARS 15-241, the Department of Education has developed methodologies designed to ensure all school types can be included in the state's accountability system in a fair and efficient manner. Adoption of these recommendations satisfies the conditional flexibility from No Child Left Behind by allowing Arizona to use its own system of differentiation, recognition, and support for all schools. Upon final adoption by the State Board of Education, schools with pending labels will be assigned accountability determinations for the 2013-2014 school year based on 2013-2014 student achievement data.

# 2013-2014 A-F Grades



*Up to 6% of schools have no accountability determination for the 2013-2014 school year.*
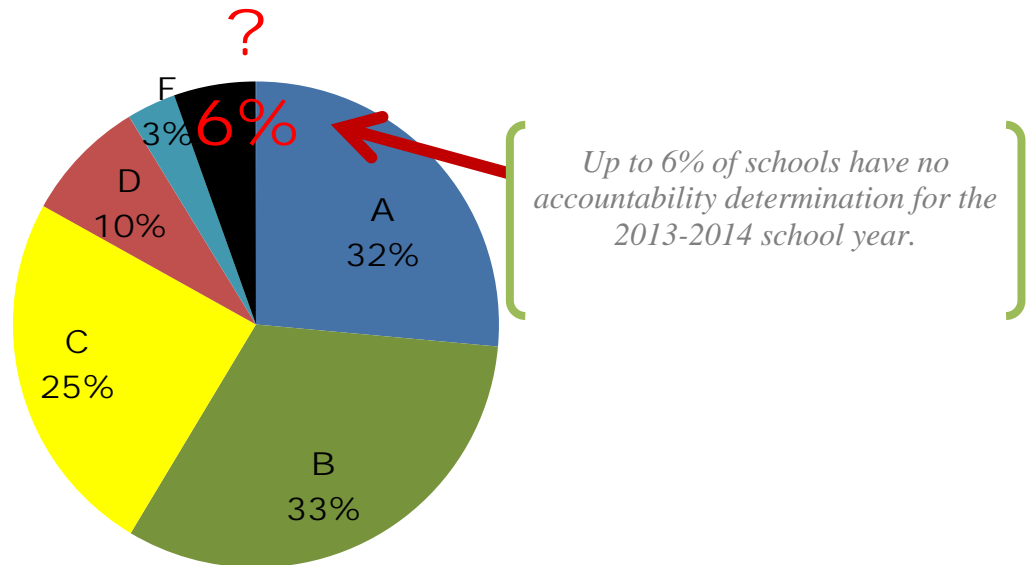
## Arizona Online Instruction Schools (AOI)

In the Spring of 2013, the State Board of Education took the first step toward recognizing the unique nature of the K-12 distance learning option by amending the "full academic year" (FAY) definition to address extent of instructional exposure rather than calendar days enrolled. In the 2012-2013 school year, less than a quarter of these schools authorized to provide online instruction were included in the A-F Letter Grade Accountability System, which primarily utilizes data from FAY students only. By evaluating student FAY status based on number of minutes of instruction, the AOI FAY definition aligned with the statutory requirements under ARS 15-808 and addressed the student mobility issues unique to online education.

While most brick and mortar schools evaluated in the A-F Letter Grade Accountability System serve mainly FAY students, only 25% of students enrolled at an AOI qualified as FAY. Based on national research as well as input from AOI operators statewide, students choose online instruction for a variety of reasons:

- Credit recovery (e.g., remedial mathematics, remedial English, etc.)
- Credit acceleration (e.g., Physical education, health, etc.)
- Local-level requirements for graduation
- Temporary or permanent preference for online instruction
- Other reasons such as health, environment, etc.

Unlike extremely small schools or schools with very few test records, most online schools provide instruction to students on an "as needed" basis and may have student achievement results which can be aggregated to produce an accountability determination. In prior years, the nature of this data produced letter grade determinations based on a small portion of the students who received instruction and/or were tested at the online school.

Since December of 2013, ADE has documented almost two dozen meetings specific to AOI accountability with external stakeholders in order to vet various methodologies which could fairly capture and reflect their unique data. ADE worked with schools which received A-F letter grades in prior years as well as those which were not rated in prior years. In the end, AOI operators advocated an accountability determination which addressed their dual enrolled students, high student mobility, and emphasis on growth. In order to ensure the accountability system was fairly applied to AOI schools for the 2013-2014 school year, only measures which were available to all schools are utilized in this recommendation. Importantly, this new model reinforces Arizona's position as a pioneer in not only school choice but also accountability systems specific to the unique educational options available to students. The proposed model establishes the basis for comparability and accountability for K-12 online education and holds AOI schools to the same expectations for student achievement and growth as all other brick and mortar schools in Arizona.
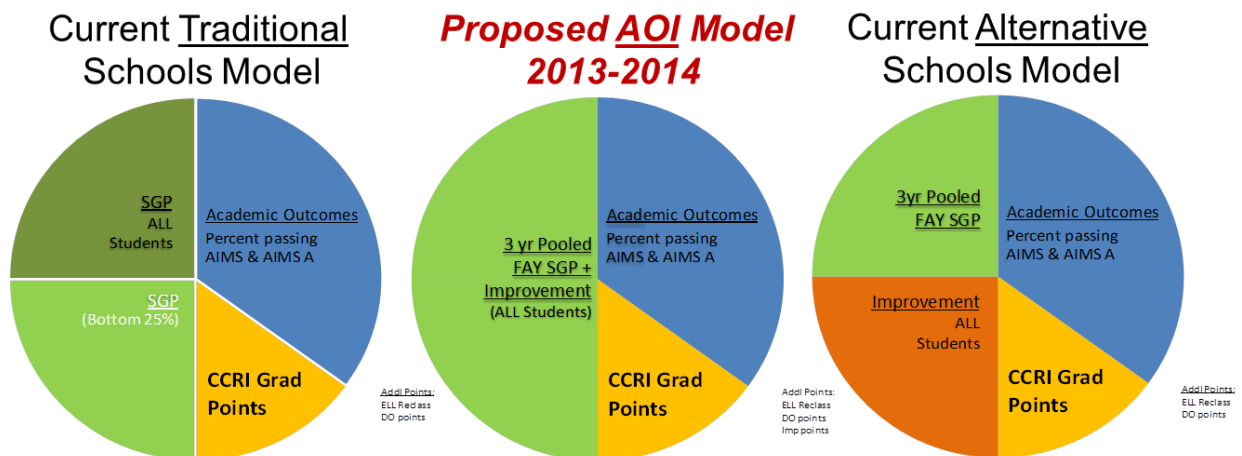


The final recommendation addressed the following measurement and policy concerns posed by AOI schools and national leaders in K-12 distance learning:

- **Low test participation rates** – AOI providers expend vast resources in order to proctor tests in-person for students across the state; however, students may not re-test for multiple schools for school accountability purposes only.

- **Graduation rate accountability** – The mandatory increase of graduation rate within the 2014 A-F system advantaged the majority of high schools; however, this same measurement change had an extremely negative impact on this particular group of schools even when all other performance measures such as student growth remained constant.
- **Letter grade based on marginal amount of data** – "Full academic year" students have been the foundation for accountability in order to give schools reasonable opportunity to instruct students on what is traditionally a full course load; an AOI letter grade based on FAY students only minimizes the amount of student achievement data which can be included and ignores the nature of the instruction AOIs provide to the majority of students who access online classes on an "as needed" or part-time basis.
- **Distinction between AOI "program" and AOI "school"** – A clear distinction exists between a "program" used to administer online instruction to students enrolled in district schools where the students are included in the accountability system for the brick and mortar school and the LEA versus an operating AOI "school" which openly recruits and enrolls students in order to generate tuition from the state and/or other LEAs.
- **Accountability for non-FAY student achievement** – The nature of online instruction and the different educational opportunities online schools can offer today's students requires some accountability for academic outcomes regardless of the intention of enrolling for a full course load or just a particular set of courses.
- **Greater percentage of students who scored non-proficient in the prior year** – Many students may favor the self-paced nature and relatively isolated environment in order to receive remedial instruction in core content such as Reading and/or Mathematics. Consequently, AOI schools enroll a higher percentage of students who have not passed their last grade level assessment.
- **More recognition for academic growth and substantive gains** – Based on individual student needs, students gain the remediation and/or instruction they need in order to grow toward proficiency; the choice to re-enroll in a traditional campus environment upon completion contributes to the high student mobility rates at AOI schools.

If adopted, the methodology specific to AOI schools would be applied to all distance learning schools using the Department's School Finance designation of a distance learning program. Schools which qualify for the "alternative school" label would maintain the alternative label in order to identify its unique purpose, but the AOI methodology would determine the A through F label for all AOI schools. The AOI methodology mimics the alternative schools model in multiple ways that advantage the AOI schools due to the emphasis on growth and academic re-enrollment (persistence); therefore, the recommendation includes the application of the 2013-2014 alternative schools letter grading scale which is based on school performance in prior years.

Table 1. *Proposed letter grading scale for 2013-2014 AOI school accountability*

| Letter Grades | Scale (ALT) |
|---|---|
| A-DL | 167+ |
| B-DL | 132-166 |
| C-DL | 97-131 |
| D-DL | 0-96 |

*Note: DL = Distance Learning*

All schools – alternative, traditional, and AOI – must have valid student enrollment, student achievement scores, and student growth data in order to receive an A-F letter grade. Regardless of instructional modality, ADE only uses data based on student enrollment which generates funding for a school. Almost two years of research and collaboration with AOI schools has justified the need to apply a statistical model representative of their unique data. The proposed methodology adjusts existing measures and calculations within the state's 2013-2014 accountability system in order to control for the unique nature of online instruction and other external factors which unduly impact this subgroup of schools.

### Recommendation
Assign 2013-2014 A-F Letter Grades, as proposed by the Department of Education's Accountability Unit, for all AOI schools with pending labels using methodology and measures specific to online learning and instruction and within the parameters set by ARS 15-241 and Arizona's 2015 ESEA flexibility request.

**Measure of Academic Progress (MAP)**
For schools that do not meet the criteria for an accountability determination under the state's standard A-F Letter Grade Accountability System, ADE must use substitute criteria to ensure accountability for student outcomes in the 2013-2014 school year. The Department began researching different methods of accountability for schools with extremely insufficient student achievement data by creating of a cross-divisional committee tasked with piloting various methodologies and surveying the field for input on the development of a new system that would not increase schools' administrative burden. The Department created the MAP system to apply to:
1. Schools with less than 30 test records in the last three years OR
2. Brick and mortar schools that did not receive an A-F Letter Grade OR
3. Schools where at least 95% of students are enrolled no more than half-time

In compliance with the conditions of Arizona's 2015 ESEA Waiver, Arizona has been developing and piloting the MAP system. If adopted, schools which do not meet criteria for accountability determinations under the A-F Letter Grade system – or for which the A-F substantive appeals committee deems necessary – will demonstrate the quality of their academic program in a qualitative manner. The proposed recommendation for Measure of Academic Progress mirrors a component of the Arizona State Board for Charter Schools Academic Performance Dashboard (Demonstration of Sufficient Progress [DSP]). In order to reduce administrative burden for charter schools, the achievement profile determined by the Arizona State Board for Charter Schools (ASBCS) will be utilized by the Department.

**Academic Program Introduction**
- Provide a brief description of the school's history and mission.

**Professional Development**
- Demonstrate your school's professional development plan is appropriate and robust.
- Demonstrate your school's teachers are appropriately evaluated and qualified to teach and meet state and federal guidelines for teaching in their content areas.

**Curriculum**
- Describe the process used to create and implement a school curriculum aligned to Arizona's College and Career Ready Standards.
- Describe any systematic processes used and evidence that is collected for monitoring and evaluating implementation of the curriculum in the classroom.

**Instruction**
- Describe the system used to monitor the integration of Arizona's College and Career Ready Standards into instruction, including what evidence is collected to ensure alignment to Arizona's College and Career Ready Standards and support for students not at grade level standard.

**Assessment**
- How does the school use student performance data to monitor the progress of its students, especially underperforming students, during the year and to plan for teaching and learning?

The increased collaboration and communication among the ASBCS and the Department allows schools to focus more attention and resources on student achievement. To streamline accountability systems and reduce the administrative burden on schools, the Department developed MAP as a truncated version of the DSP that adequately covers content universal to all schools. For all schools that did not receive a 2014 A-F letter grade or ASBCS Dashboard, the following process will be applied:

1. ADE will notify schools with no A-F grade of the use of MAP or the ASBCS Dashboard – ADE will coordinate Dashboard/DSP label with ASBCS.
2. ADE will verify and provide all data within the Department related to student achievement and student outcomes for a MAP label.
3. Schools submit narrative on their school's history and mission, professional development, instruction, curriculum, and assessment areas.
4. ADE Accountability will identify qualified education practitioners to review and evaluate schools' submissions to ADE. MAP reviewers must have applied experience in K-12 school administration or other leadership roles.
5. Each of the four areas will be independently evaluated then aggregated for a final MAP Label (see below). Reviewers' ratings will be confirmed and assigned by ADE Accountability.

Table 2. *Proposed MAP accountability ratings for schools with insufficient data*

| A-F equivalent | ASBCS label | ADE MAP label |
|---|---|---|
| A | Exceeds Standard | Exceeds Standard |
| B | Meets Standard | Meets Standard |
| C | Approaches Standard | Approaches Standard |
| D | Falls Far Below | Falls Far Below |

ADE worked with district and charter schools as well as the ASBCS in finalizing the MAP data collection tool. School and district personnel offered comments on multiple drafts to ensure that MAP was a fair and successful accountability method for schools which lacked the quantitative data required in any A-F accountability formula. Despite a low response rate, ADE also collected survey data from schools for a two month period which resulted in an overall agreement for MAP's purpose, methodology, and expectation. Because the MAP system, as it relates to charter schools, depends on a cooperative and communicative relationship with the ASBCS, the ADE will closely monitor the alignment between MAP and ASBCS standards used for charter school accountability.

***Recommendation***

Adopt and implement the MAP system for 2013-2014 accountability determinations in order to evaluate schools with insufficient data and currently pending labels as recommended by ADE.