

# Guidance on an Ethical Framework for Alternative Accountability In New York State

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In New York State, transfer schools and traditional schools are evaluated in the same way despite fundamental differences in their purpose and design. As a result, transfer schools are being disproportionately identified as needing improvement. Transfer schools play a critical role in fighting racial injustice in our education system. Compared to traditional high schools, they serve a disproportionately higher number of Black and Latinx students, including youth with disabilities, students who face housing insecurity, and English language learners—students who are systematically denied the opportunity to thrive in a traditional public school setting.

Research shows that transfer schools reduce the dropout rate, support academic progress, and create supportive learning [environments](#). At transfer schools, students experience personalized instruction, tailored student support services, paid internships, supportive relationships with caring adults, and [more](#). Yet the state's current system for holding transfer schools accountable under the Every Student Succeeds Act (ESSA) [fails](#) to recognize where and how students are succeeding in alternative settings.

If we are committed to reducing racial injustice in our education system, we must stop relying on illogical traditional measures that uphold the very structures that failed these students to [begin with](#). **Transfer schools need to be held to high standards, but doing so requires an alternative accountability system that is fair, transparent, and ethical.** Across the nation, there is precedent for differentiating accountability—at least 17 states employ alternative accountability systems. Without an alternative approach, transfer schools waste valuable time and resources appealing their evaluations—instead of focusing on what matters most: their students.

The following recommendations were developed in conversations with New York City educators, community-based partners, families, and transfer school alumni. Early drafts were informed by a national scan of alternative accountability systems, relevant external research, and Eskolta's research and expertise. Our hope is that New York State policymakers will swiftly move to partner with educators and communities to further refine and operationalize these recommendations.

## **An ethical framework WILL include:**

- Alternative cohorts that attribute student data to schools only if the student enrollment and days attended exceeds a minimum threshold.
- Considerations of the diverse missions and populations for each NY transfer school. Some schools serve high percentages of multilingual learners, students with disabilities, newcomers, adjudicated youth, students in temporary housing, etc. Serving these populations requires unique structures and supports.
- Site visits by qualified alternative school educators prior to any determination of school quality.
- Any school identified as in need of improvement should receive evidence-based support and funding to target identified growth areas. Funding should not be restricted in ways that fail to address student and family needs.
- Targets that are adjusted and realistic for alternative settings.
- A system that can be easily understood by families and educators.

*Currently, if a student enrolls in a transfer school and then drops out quickly or transfers to a non-diploma granting alternative, the transfer school is solely accountable for the “drop out” as opposed to the sending school.*

**Example:** *One principal shared that funding was limited to professional development and did not align with students’ need for mental health and other services.*

**Example:** *Based on state accountability data from 2017-18, the average chronic absence rate for transfer schools was 75%, compared to a long-term state goal of 20%. Rates of chronic absenteeism will remain high for alternative schools, even with significant attendance improvement.*

## **An ethical framework will NOT include:**

- Four-year cohort measures that fail to recognize achievements after the fourth year in high school.
- A reliance on high-stakes Regents exams as a measure of achievement, especially without consideration for students with disabilities.
- A comparison against traditional schools that does not account for the reality that transfer schools serve students whom the system has failed.

## **Meaningful Measures**

### **Measures of student growth including, but not limited to:**

- Credit accumulation and course pass rates in current school as compared to previous school.
- Incremental growth in students’ skills and knowledge that may go unnoticed if relying on Regents exams. Growth may be measured using comparisons of work products on appropriately norm-referenced performance assessments.

### **Measures of student achievement:**

- Completion rates, including High School Equivalency (HSE) credentials, regardless of age acquired
- 6- and 7-year cohort graduation rates AND one-year graduation rates.

- Consider establishing a peer comparison benchmark or subgroups against which graduation outcomes are compared. Current state transfer school benchmarks do not include a range of important student characteristics that predict graduation.
- One-year graduation rates are easy to understand and reflect recent efforts of the school. They are [calculated](#) by dividing students who graduate or earn equivalent credentials in a given year by all students who were eligible to finish in that year. A definition of eligibility must be clear and collectively defined.
- Proficiency on either the ELA Regents Exam or state-approved alternative assessment of reading and writing skills.
- Create a process that would allow transfer schools, and other schools, to use high-quality alternate assessments of learning, rather than [high-stakes Regents exams](#), including performance-based assessments.

**Measures of student engagement and support:**

- Realistic attendance goals, recognizing that the majority of students have been severely chronically absent in the past for reasons that reflect inequitable structures outside of the school (housing and food access, mental health services, etc.). Attendance policies should [consider flexibility](#) for students facing structural barriers to attendance.
- Persistence rate, per New York City’s definition ([pg.11](#)), to highlight students who continue enrollment or complete school successfully, of those qualified.
- Student and family voice, including survey results, like the NYC School Survey. Measures should be broadened further to assess how a school has personalized support, how it is connected to the community, and how it has helped students and families overcome hardships. Equity in evaluation means centering students and families as the experts regarding their own experiences.

**Measures of postsecondary readiness that consider multiple pathways could include:**

- Credit for paid work-based experiences
- Credentials earned
- Completion of career-readiness coursework

*“[Transfer schools] have evolved an ethic of educational accountability—measured not by arbitrary cutoffs in graduation rates or test scores, but by keeping the light always on and the door always unlocked for their students. They seek and deserve an accountability structure that takes a holistic and individuated approach to these schools and students, careful to not overburden them with misdirected state inter-vention or to stifle the very successes they were designed to cultivate.”*

## Relevant Resources:

- A-Game (2020). Minding the Gap: How state policies can create conditions for innovation in alternative education accountability <https://nationalcharterschools.org/a-game-grant/documents-deliverables/>
- A-Game (2020). Measuring Quality: A Resource Guide for Authorizers and Alternative Schools. <https://nationalcharterschools.org/a-game-grant/documents-deliverables/>
- American Youth Policy Forum (2019): Alternative Education in ESSA State Plans: A Review of 38 States. <https://www.aypf.org/wp-content/uploads/2019/06/Alternative-Education-in-ESSA-State-Plans-A-Review-of-38-States.pdf>
- American Youth Policy Forum. AmYouthPolicyForum. (2016, July 22). *ESSA and Understanding Accountability in Alternative Education* [Video]. YouTube. <https://www.youtube.com/watch?v=oa96cDHISdg>
- Baum-Tuccillo, M., Arora, V., Holstein, A., & Fine, M. (2020). *And Still They Rise: Lessons from Students in New York City's Alternative Transfer High Schools*. New York: The Public Science Project. [publicscienceproject.org/still-they-rise/](http://publicscienceproject.org/still-they-rise/)
- Coalition for Multiple Pathways to A Diploma (2019). It's Time to #Rethink Regents Exams. [https://www.advocatesforchildren.org/sites/default/files/library/diploma\\_coalition\\_regents\\_onepg.pdf?pt=1](https://www.advocatesforchildren.org/sites/default/files/library/diploma_coalition_regents_onepg.pdf?pt=1)
- Eskolta (2014). *Transfer School Accountability Recommendations to the NYCDOE*
- Fine, M., & Pryiomka, K. (2020). *Assessing college readiness through authentic student work: How the City University of New York and the New York Performance Standards Consortium are collaborating toward equity*. Palo Alto, CA: Learning Policy Institute. <https://learningpolicyinstitute.org/product/assessing-college-readiness-authentic-student-work-report>
- Jimenez, L., Rothman, M., Roth, Erin, Sargrad, S. (2018). *Blueprint for Accountability Systems for Alternative High Schools*. Center for American Progress. <https://www.americanprogress.org/issues/education-k-12/reports/2018/06/15/452011/blueprint-accountability-systems-alternative-high-schools/>