



# VIRGINIA BOARD OF EDUCATION

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# AGENDA ITEM

**Agenda Item:** F

**Date:** April 21, 2022

**Title:** Final Review of Requests for Alternative Accreditation Plans

**Presenter:** Amy Siepka, Director of Accountability

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**Purpose of Presentation:**

Action required by state or federal law or regulation

**Executive Summary**

Eight special purpose schools in Virginia are requesting approval of Alternative Accreditation Plans from the Virginia Board of Education (Board):

- **Arlington County Public Schools:** Arlington Community High School.
- **Chesterfield County Public Schools:** Carver College and Career Academy;
- **Fairfax County Public Schools:** Kilmer Center School, Fairfax County Adult High School, Key Center School, Mountain; View High School, and Bryant High School; and
- **Loudoun County Public Schools:** William Obediah Robey High School.

Such schools may seek approval of an alternative accreditation plan from the board under [8 VAC 20-131-420.D](#) of the *Regulations Establishing Standards for Accrediting Public Schools in Virginia*. Attachment A outlines the alternative accreditation plan submission, approval, and implementation process. Attachments B-H include the requests for an alternative accreditation plan from the local school divisions

At the [November 2021 Board work session](#), Virginia Department of Education (VDOE) staff discussed a realignment of the Alternative Accreditation Plans, and sought the Board's guidance to ensure that the realignment efforts met their expectations. At the [March 17, 2022 Board Business Meeting](#), VDOE staff reviewed the guidelines in place, and presented a first review of the Alternative Accreditation Plans. No changes have been made to this item since first review.

**Action Requested:**

Final review: Action requested at this meeting.

**Superintendent’s Recommendation**

The Superintendent of Public Instruction recommends that the Board approve the Alternative Accreditation Plans for the eight special purpose schools for the 2022-2023 accreditation year.

**Rationale for Action:**

Special purpose schools may seek approval of an alternative accreditation plan from the board under [8 VAC 20-131-420.D](#) of the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* states. These applications meet the guidelines established by the Department and align with the 2017 school accreditation model.

**Previous Review or Action:**

**Date:** November 13, 2021

**Action:** Work Session

**Date:** March 17, 2022

**Action:** First Review

**Background Information and Statutory Authority:**

Eight special purpose schools in Virginia are requesting approval of Alternative Accreditation Plans from the Board of Education. Such schools are allowed to request this flexibility under [8 VAC 20-131-420.D](#) of the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* states, which states:

D. Alternative accreditation plans. Subject to the provisions of subsection B of this section, the governing school board of special purpose schools such as those provided for in § 22.1-26 of the Code of Virginia, Governor's schools, special education schools, alternative schools, or career and technical schools that serve as the student's school of principal enrollment may seek approval of an alternative accreditation plan from the board. Schools offering alternative education programs, schools with a graduation cohort of 50 or fewer students as defined by the graduation rate formula adopted by the board may request that the board approve an alternative accreditation plan to meet the graduation and completion index benchmark. Special purpose schools with alternative accreditation plans shall be evaluated on standards appropriate to the programs offered in the school and approved by the board prior to August 1 of the school year for which approval is requested. Any student graduating from a special purpose school with a Standard Diploma or an Advanced Studies Diploma must meet the requirements prescribed in [8VAC20-131-50](#) or [8VAC20-131-51](#).

As set forth in the [Standards of Quality](#) and according to department procedures, any school board may request the board for release from state regulations or, on behalf of one

or more of its schools, for approval of an Individual School Accreditation Plan for the evaluation of the performance of one or more of its schools as authorized for schools enumerated in this subsection, based on special circumstances.

In addition, the *Guidance Document: Governing Certain Provisions of the Regulations Establishing Standards for Accrediting Public Schools in Virginia* states:

In accordance with the provisions of [8VAC20-131-420\(B\)](#) of the standards, local school boards may seek waivers of provisions of the standards to address the unique needs of special purpose schools. Such requests may include an alternative accreditation plan. Applications must be submitted to the Board for consideration at least ninety days prior to August 1 of the school year. Requests for consideration must be accompanied by information that documents the need for approval of the request.

At the [November 2021 Board work session](#), VDOE staff discussed a realignment of the Alternative Accreditation Plans to the new 2017 Accreditation Model, and sought the Board's guidance to ensure that the realignment efforts met their expectations.

At the [March 17, 2022 Board business meeting](#), VDOE staff reviewed the new guidelines and the processes in place for schools submitting alternative accreditation plans. The plans for the eight school divisions were submitted for first review.

**Timetable for Further Review/Action:**

If approved by the Board, these schools will be notified of the approval of their plan for the 2022-2023 accreditation year.

**Impact on Fiscal and Human Resources:**

No significant fiscal or human resource impact is expected for school divisions or the VDOE.



## Alternative Accreditation Plan Submission, Approval, and Implementation Process

- A Superintendent's Memorandum is sent out to school divisions to provide information regarding the Alternative Accreditation application process (memo includes the application as an attachment),
- VDOE staff meets with school leaders who have applied to explain the process, timeline, and guidelines.
- The school submits an Alternative Accreditation Plan to the Office of Accountability for feedback regarding clarity, completeness, and alignment to the guidelines.
- A VDOE committee reviews the plans in order to provide the feedback. The committee consists of staff members from the Offices of Student Assessment, Data Services, Research, Instructional Services, Career, Technical and Adult Education, and School Quality.
- The Office of Accountability provides feedback to the school, and meets with school leaders to answer questions that specifically relate to their school.
- The school submits their final Alternative Accreditation Plan to the Office of Accountability so it can be brought before the Virginia Board of Education. The plan contains alternative measures for one or more indicators.
- The Board will receive the plans for first review and approve or deny the plans upon final review. Schools may be asked to be present for Board questions at the final review.
- The Office of Accountability notifies the school of the Board's decision.

For those schools whose Alternative Accreditation Plan was approved:

- During the state accreditation process, rates for all school indicators are calculated using the same methodology that is used for all other schools in the Commonwealth.
- The Office of Accountability reviews the state accreditation data and confers with the schools who have an Alternative Accreditation Plan.
- If an indicator the school included in their Alternative Accreditation Plan has a Level 3 rating using the state calculation, the school will calculate the rate using the alternative measure.
- If the alternative measure indicates a level other than a Level 3, the school presents the alternative calculations and corresponding data to the Office of Accountability. The



accuracy of the calculations are verified.

- The Office of Accountability communicates with the Office of Data Services to ensure the indicators which have an alternative measure are accurately reported.
- Performance Levels for all indicators are used to determine the school's Accreditation status using the same methodology that is used for all schools in the Commonwealth.

## Alternative Accreditation Plan Guidelines

Current guidelines, along with their flexibilities are:

- Include all students to the greatest extent possible in the alternate model, rather than excluding students, to meet established criteria. Flexibilities are provided for students who are enrolled in school after compulsory attendance age and for students who are incarcerated;
- Keep the established benchmarks for Level indicators consistent with the state model (i.e., The Level 1 performance level for English must remain greater than or equal to 75%.);
- Maintain “sufficient improvement” as a criteria for determination of the Level 1 and Level 2 performance levels, but modified sufficient improvement percentages can be used (i.e., use 5% to demonstrate improvement rather than 10%);
- Keep an established minimum pass rate when using the “sufficient improvement” criteria to earn a Level 2 performance rating in the achievement indicators, but the rate can be amended from the State rate of 50% (i.e., the minimum pass rate could be 45% rather than 50%);
- Calculate the consecutive multi-year rate without excluding any years, but additional years can be added (i.e., a cumulative 4-year rate could be used instead of the standard cumulative 3-year rate);
- Track chronic absenteeism per division policy, but that policy can use “meaningful engagement” definitions to guide absenteeism;
- Use statewide assessment results to calculate student achievement indicator rates. Passing scores and approved substitute tests are to be used in the results, as per the State guidelines. Flexibility to use test scores in the [locally awarded verified credit range](#) in the achievement rate is permissible; and
- Optionally, to include other indicators, in addition to the state's established indicators, if the measure showcases high quality foundational educational programs, demonstrates the school is raising student achievement, and is preparing students for real-life, authentic experiences.



## Flexibilities Specific to Accreditation Indicators

### Academic and GAP Group Achievement

#### Allowable Modifications:

- May count test scores in the locally awarded verified credit range (i.e., 375-399) in the achievement rates;
- May change the minimum pass rate (“the floor”) when using the “sufficient improvement” criteria to earn a Level 2 performance rating;
  - Example: Use the reduction of the failure rate ( R10) when the pass rate is 45% rather than 50%
- May use additional years to calculate a multi-year rate;
  - Example: Use a cumulative 4-year rate rather than a cumulative 3-year rate
- May modify the reduction of the failure rate (R10) to another value.
  - Example: Use 5% instead of 10%

#### Non-allowable Modifications:

- Using a weighted value for any test outcome other than scores in the locally awarded verified credit range;
- Using scenarios to earn bonus points;
- Amending definitions and calculations of standard terms/concepts (i.e., recovery, transfers);
- Changing the performance level benchmarks for academic achievement indicators;
  - Example: The Level 1 performance level for English must remain greater than or equal to 75%.
- Using “best of” when using additional years to calculate a cumulative multi-year rate.
  - Example: Using the best 3 out of 4 years to calculate the 3-year rate

### Chronic Absenteeism

#### Allowable Modifications:

- May exclude students who enrolled in a Virginia Public School for the first time after compulsory attendance age;
- May use additional years to calculate a multi-year rate;
  - Example: Use a cumulative 4-year rate rather than a cumulative 3-year rate
- May modify the reduction of the chronic absenteeism rate (R10) to another value.
  - Example: Use 5% instead of 10%
- May amend the student-level thresholds for chronic absenteeism;
  - Example: A student must be absent 15% or more of the school year, rather than



10%, to be included in the calculation.

- May explicitly define or redefine “meaningful engagement” and “meaningful interactions” to guide absenteeism policies or procedures (as referenced in [Superintendent’s Memorandum 230-21](#)).
  - Ensure meaningful engagement is rigorous enough to meet the intent of the indicator.

#### Non-Allowable Modifications:

- Excluding any students from the calculation except students who enrolled in a Virginia Public School for the first time after compulsory attendance age;
- Using “best of” when using additional years to calculate a cumulative multi-year rate.
  - Example: Using the best 3 out of 4 years to calculate the 3-year rate
- Applying weighted values for students meeting certain criteria;
- Using any scenario to earn bonus points; and
- Changing the performance level benchmarks for Chronic Absenteeism
  - Example: The Level 1 performance level must remain less than or equal to 15%.

### Graduation Completion Index (GCI)

#### Allowable Modifications:

- May exclude students who-
  - enrolled in a Virginia Public School for the first time after compulsory attendance age and did not graduate;
  - enrolled in the school for the first time over compulsory attendance age and did not complete  $n$  semester/months. Length of time depends on school data but should not exceed two semesters;
  - are over compulsory attendance age and transfer out of state where there is not a program for them;
  - fail to complete the school year due to incarceration;
- May use additional years to calculate a multi-year rate;
  - Example: Use a cumulative 4-year rate rather than a cumulative 3-year rate
- May modify the increase of the GCI rate (I2) to show improvement to another value.
  - Example: Use 2% instead of 2.5%
  -

#### Non-Allowable Modifications:

- Excluding student groups other than those indicated under *Allowable Modifications*;
- Using “best of” when using additional years to calculate a cumulative multi-year rate.
  - Example: Using the best 3 out of 4 years to calculate the 3-year rate





- Applying weighted values for students meeting certain criteria;
- Using any scenario to earn bonus points; and
- Changing the performance level benchmarks for GCI.
  - Example: The Level 1 performance level must remain greater than or equal to 88%

### Dropout Rate

#### Allowable Modifications:

- May exclude students who-
  - enrolled in a Virginia Public School for the first time after compulsory attendance age and did not graduate;
  - enrolled in the school for the first time over compulsory attendance age and did not complete  $n$  semester/months. Length of time depends on school data but should not exceed two semesters;
  - are over compulsory attendance age and transfer out of state where there is not a program for them;
  - fail to complete the school year due to incarceration;
- May use additional years to calculate a multi-year rate;
  - Example: Use a cumulative 4-year rate rather than a cumulative 3-year rate
- May modify the reduction of the dropout rate (R10) to another value.
  - Example: Use 5% instead of 10%

#### Non-Allowable Modifications:

- Excluding student groups other than those indicated under *Allowable Modifications*;
- Using “best of” when using additional years to calculate a multi-year rate;
  - Example: Use the best 3 out of 4 years to calculate the 3 year rate
- Applying weighted values for students meeting certain criteria;
- Using any scenario to earn bonus points; and
- Changing the performance level benchmarks for dropout rate.
  - Example: The Level 1 performance level must remain less than or equal to 6%.

### College, Career, and Civic Readiness Index (CCCRI)

Will not be used for determining accreditation status until the 2023-2024 accreditation year.

#### Allowable Modifications:

- May exclude students who-
  - enrolled in a Virginia Public School for the first time after compulsory attendance age and did not graduate;
  - enrolled in the school for the first time over compulsory attendance age and did





- not complete  $n$  semester/months. Length of time depends on school data but should not exceed two semesters;
- are over compulsory attendance age and transfer out of state where there is not a program for them;
- fail to complete the school year due to incarceration;
- May broaden the definitions used for student activities that count in the calculations;
  - The criteria must be rigorous and meaningful regarding the intent of the indicator.
  - The activity must strengthen students' preparation for college and the workforce before leaving high school.
- May create a connection of existing work-based experiences or service-learning experiences to coursework in order to count towards CCCRI.

#### Non-Allowable Modifications:

- Excluding student groups other than those indicated under *Allowable Modifications*;
- Applying weighted values for students meeting certain criteria;
- Using any scenario to earn bonus points; and
- Changing the performance level benchmarks for CCCRI.
  - Example: The Level 1 performance level must remain greater than or equal to 85%.

### Other Indicators

The alternative accreditation may identify other indicators on which the school can be measured. Indicators should showcase high quality foundational educational programs, demonstrate the school is raising student achievement and is preparing students for real-life, authentic experiences.

The indicator should be a meaningful way to determine the effectiveness of the school for the student population served. It should be sustainable so that growth may be calculated over multiple years. If other indicators are included in the plan, they should be in addition to the indicators that are part of regular state accreditation.

### Additional Information

- The alternate accreditation plan is not an "all or nothing" document. For instance, if a plan is submitted that includes academic achievement for math and GCI and under regular accreditation the school made a Level one or Level two in math but not GCI, the school would only use the GCI portion of the plan.
- Supporting historical data should be a minimum of two years and can be retrieved from



SSWS.

- Locally administered growth assessments cannot be used as a substitute growth measure in accreditation plans.
- Small  $n$  size rules should help with concerns regarding negative impacts of small numbers on accreditation. These rules can be found in the Calculating Accreditation document in SSWS.
- CCCRI will not be used in accreditation in 2022-2023 but school divisions are encouraged to include it in the plan if it is a metric for which a modified indicator may be needed in the future.
- Specific to 2022-2023 accreditation: Schools cannot use statewide data from the past two waived school years in your justification for a modified indicator.

### Regulatory Authority

[8 VAC 20-131-420.D](#) of the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* states, which states:

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In addition, the *Guidance Document: Governing Certain Provisions of the Regulations Establishing Standards for Accrediting Public Schools in Virginia* states:



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