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The mission of the NAEA is to provide advocacy and support for professionals who work on behalf of children and youth receiving alternative education services. The organization's vision is achieved by providing outstanding, innovative, and professional services to alternative educators nationally and internationally to enhance programs, promote academic excellence, develop self-discipline, and create life-long learners in a multifaceted, diverse society.

NAEA commends authors of the Every Student Succeeds Act (ESSA) and legislators for its passage. The vision of NAEA correlates on many levels with the policies set forth in ESSA. We agree that graduation rates have increased. However, while the national on-time graduation rate goal is 90%, the actual rate is 82.3%. School dropout, reentry, and recovery inefficiencies and impact are still critical concerns, particularly for certain subgroups of students. We know that students who drop out of high school earn less, pay less in taxes, are less healthy, rely more on public health, are less involved civically, are more likely to be arrested and incarcerated, and are more likely to use welfare services.

NAEA is concerned with the proposed regulations in ESSA that would rely on the four-year adjusted cohort graduation rate for identification to provide a consistent benchmark for holding schools accountable across states. Under ESSA's new definition, 52% of the nation's low-graduation-rate high schools would be alternative, charter, or virtual schools (DePaoli, Balfanz, & Bridgeland, 2016). This definition could impede the ability of states to have a separate alternative schools model in the new accountability system/state plan since the proposed regulations require the same indicators calculated in the same way and applied with the same weights across all schools. Alternative schools educate over-aged and under-credited students as well as alternative education youth who can successfully graduate when given more time—five, six, seven, even eight years—up to a state's legislated age for a student to receive public education.

Although ESSA implies differentiated accountability for alternative schools and does not use the four-year rate as the sole measure, there has not been anything identified in the proposed regulations other than language that would allow a waiver from the low-graduation rate criterion or use of the extended-year graduation rate as the measure of "one-third or less." To better gauge the effectiveness of alternative schools, a distinct system comprised of indicators better suited to describe the achievement of alternative schools should be developed.

NAEA recommends SEAs and LEAs develop and adopt a differentiated accountability system for graduation rates for alternative education and programs. The adoption of this system would not adversely affect state graduation rates and would allow students in nontraditional settings to achieve high school diplomas without time constraints.

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## *Developing Potential in All Students*

When interpreting and implementing ESSA, NAEA recommends SEAs and LEAs ask the following questions:

- Will our guidelines and interpretations have any impact on our dropout rates?
- Will any student suffer or need additional support as a result of our interpretation?

If the answer to either question is “yes,” then the following questions should be asked:

- Can we identify early students who may be affected?
- Do we have the appropriate responses, processes, and programs in place to prevent negative outcomes?

NAEA also recommends SEAs and LEAs redirect and focus allocated funds for the expansion, development, and implementation of high-quality nontraditional programs. There is a need to continue the momentum of providing adequate funding to alternative schools/programs through Titles I, II, and III to ensure that disadvantaged students, faculty, administrators, parents, and communities at large receive the same quality of education as do their counterparts in traditional high schools. Monies from these funds could be used for the development and implementation of alternative programs utilizing NAEA’s Exemplary Practices in Alternative Education.

There is potential for ESSA to lead to greater support for all students through early identification of issues, the provision of targeted support, collaboration with communities and families, and the creation of safe learning environments that celebrate youth engagement. However, without flexibility within ESSA guidelines pertaining to alternative education, SEAs and LEAs may see a reduction or possible elimination of nontraditional education programming, leading to an increase in dropout rates.

Questions or comments regarding this letter may be sent to the NAEA board at [davenportk@rcschools.net](mailto:davenportk@rcschools.net).

Sincerely,



Kay Davenport, President  
National Alternative Education Association

### References Cited:

DePaoli, J. L., Balfanz, R., & Bridgeland, J. (2016). *Building a Grad Nation: Progress and Challenge in Raising High School Graduation Rate –Annual Update 2016*. Washington, D.C.: Civic Enterprises, Everyone Graduates Center at Johns Hopkins University, Alliance for Excellent Education, and America's Promise Alliance. Retrieved from [http://www.gradnation.org/sites/default/files/civic\\_2016\\_full\\_report\\_FNL2-2\\_0.pdf](http://www.gradnation.org/sites/default/files/civic_2016_full_report_FNL2-2_0.pdf)