



COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF EDUCATION

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SECRETARY OF EDUCATION

July 26, 2012

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Deborah Delisle  
Assistant Secretary  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Ms. Delisle:

In response to guidance provided by the U.S. Department of Education (USDE) regarding revisions to state accountability workbooks, Pennsylvania is proposing the following revisions to its workbook for the 2011-12 school year. We believe the proposals are in compliance with the current law, regulations and flexibility provided, and hope that USDE accepts our proposed revisions.

1) Graduation Rate

Requested Amendment:

Pennsylvania is proposing the use of a four-year extended cohort graduation rate to replace the leaver graduation rate. The goals for the four-year cohort would be 85 percent, for a five-year cohort 90 percent, and 95 percent for a six-year cohort. The target would be a 10 percent reduction of the difference between the previous year's graduation rate and the goal of 85 percent. The new four-year extended graduation rate would measure and hold accountable the same subgroups that are held accountable in the performance and participation measures, and the minimum N for the graduation rate would be the same as the minimum N for performance and participation, 40. Pennsylvania would continue to lag in its graduation rate reporting; thus, the graduation rate used for 2012 AYP would be the 2011 rate.

Rationale:

The 85 percent goal and the 10 percent reduction target are the current standards that Pennsylvania uses for its graduation rate. The minimum N of 40 is also the minimum N that was approved by the U.S. Department of Education for participation and performance.

2) Consider Charter Schools as LEAs for Accountability Purposes

Requested Amendment:

Pennsylvania requests the ability to consider charter schools as Local Education Agencies (LEAs) when performing all AYP calculations pertaining to each charter school. Beginning with the 2012 assessment results and forthcoming AYP calculations, Pennsylvania would utilize grade spans, grades 3-5, 6-8 and 9-12 in determining each charter school's AYP status.

Rationale:

Charter schools in Pennsylvania are run as separate entities to the school district from which they receive their charter. A separate governing board is put in place for guidance and decision making pertaining to all aspects of the charter school's operation. A Chief Academic Officer has overall authority for day to day operations and decision making for the charter school. In addition, charter schools receive a distinct Administrative Unit Number (AUN) from the Pennsylvania Department of Education that is issued to each LEA in the state and is utilized for all communication and correspondence between the LEA and the department. Charter school student populations and grade configurations are expanding rapidly in Pennsylvania and calculating at the grade span level more accurately reflects the performance that is achieved by its students.

Sincerely,



Ronald J. Tomalis

c: Collette Roney, U.S. Department of Education  
Larry Wittig, Chairperson, State Board of Education