

## Waiver Extension Request of Four-Year Adjusted Cohort Graduation Rate (ACGR)

As the State Education Agency (SEA) in Georgia, the Georgia Department of Education requests to extend the waiver of Section 8101(25)(A)(ii) – four-year Adjusted Cohort Graduation Rate (ACGR) – that was granted by Assistant Secretary for Elementary and Secondary Education Frank Brogan on November 21, 2019.

In addition to the receipt of a waiver, Georgia also received an ESSA amendment to allow for a state-defined Alternate Diploma for the students with the most significant cognitive disabilities. At the Georgia State Board of Education meeting on February 20, 2020, the state [Graduation Requirements were formally amended to include the new state-defined Alternate Diploma](#), as was required for an extension of the waiver of Section 8101(25)(A)(ii) – four-year Adjusted Cohort Graduation Rate (ACGR) per Assistant Secretary Brogan's letter.

Because there will be several years before this first cohort of students is eligible to graduate with the Alternate Diploma, Georgia is requesting an extension to the waiver with flexibility to calculate the graduation rate for federal accountability purposes as if these students were already receiving the alternate diploma – rather than a regular high school diploma as they currently are – until the first cohort of students who would be eligible to receive the alternate diploma is eligible to graduate in 2024.

With these eligible students already identified, we ask that Georgia be held harmless from the negative impact of the graduation rate calculation without the inclusion of these students. In practice, the education these students receive will not be impacted by this change; so we believe a graduation rate calculation without students with the most significant cognitive disabilities counted as graduating would be a false indicator of what our schools are doing to improve graduation outcomes for students with the most significant cognitive disabilities. The exclusion of these students could also lead to schools being inappropriately identified for CSI status, diverting funds from schools that should appropriately receive that identification.

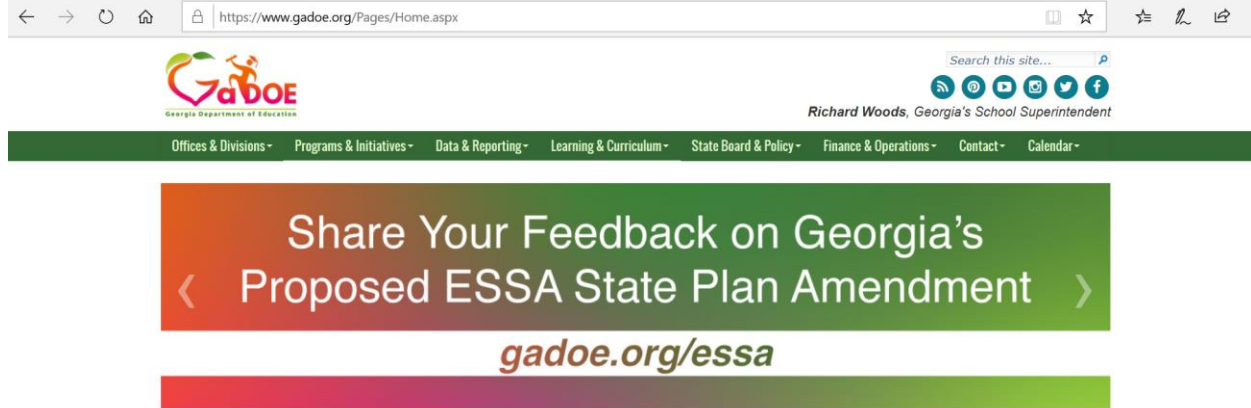
Furthermore, an artificial deflation of graduation rates essentially creates a four-year window within which students with the most significant cognitive disabilities are unable to count in the graduation rate, even if they do graduate under longstanding state policy. As stated in U.S. E.D.'s guidance from the monitoring report, "GaDOE also confirmed that the graduation rate data used for Federal accountability will exclude these students who do not meet the ESEA requirements for being included in the adjusted cohort graduation rate." This exclusion of these students from our graduation rate for over four years creates a substantial civil rights concern.

Since Georgia is not allowed to count students with the most significant cognitive disabilities who are assessed with the Georgia Alternate Assessment as graduates, and since Georgia cannot immediately start offering an alternate diploma because the general diploma is a property right for current students, there is a multi-year period where it is impossible for these students to count in the graduation rate. Georgia's request to extend the waiver of ESEA Section 8101(25)(A)(ii) – four-year Adjusted Cohort Graduation Rate (ACGR) rectifies that concern until the alternate diploma takes effect. We request to continue applying this waiver to the 2020 4-year adjusted cohort graduation rate and beyond until the first cohort of students who would be eligible to receive the alternate diploma is eligible to graduate in 2024.

# Original Stakeholder Feedback Detailed Below

## Appendix A: Public Notice

### Website Homepage Banner



### Website: ESSA Homepage



## Email Notice to Superintendents (1)

### Matt Cardoza

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**From:** Matt Jones <mattjones@doe.k12.ga.us>  
**Sent:** Friday, April 26, 2019 2:47 PM  
**To:** Matt Cardoza  
**Cc:** Matt Cardoza; Zephine SmithDixon; Allison Timberlake; Meghan Frick  
**Subject:** ESSA State Plan Amendment -- Students with significant cognitive disabilities

Superintendents,

I am writing to let you know the Georgia Department of Education is beginning the process of requesting an amendment to our ESSA plan. Following recent federal monitoring, the U.S. Department of Education (US Ed) informed us we can no longer count students with significant cognitive disabilities who are assessed using the alternate assessment, and who earn a regular diploma as “graduates” in the graduation rate.

As was recently mentioned at the Bootstrap Conference, US Ed is allowing states to develop an Alternate Diploma for these students. Students receiving this Alternate Diploma would count toward the four-year cohort graduation rate, regardless of the year they received their diploma – provided they graduated within the time period for which the state ensures the availability of a free appropriate public education for students with disabilities (in Georgia, this is when a student has reached age 22).

Because the regular diploma is considered a property right, we cannot offer this new Alternate Diploma until a new cohort of ninth grade students begins.

As part of our amendment, we will request permission to not remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation until the first cohort of students offered the Alternate Diploma would be expected to graduate.

We are hopeful US ED will allow this, so that any negative impact to graduation rates can be avoided.

If our amendment request is denied, and we are required to immediately make this change, it could negatively impact graduation rates as soon as this year (when 2019 graduation rates are released in the fall) and until/unless US ED provides Georgia the option of developing an Alternate Diploma.

Again, we are hopeful US ED will approve our amendment request to avoid this outcome. In the coming weeks, we will post our amendment for 30 days of public review, after which we will make any necessary changes and submit. I encourage you to offer your feedback during the public review period so we can craft the strongest possible amendment that best meets the needs of students. We are also hosting a webinar specifically for school district/school staff to learn more about the amendment and to ask questions. The webinar will be held on May 6 from 10-11 a.m. You can register for the webinar at <https://attendee.gotowebinar.com/register/2716296595789697538>.

If you have questions concerning the ESSA amendment and its impact, please contact Matt Cardoza at mcardoza@doe.k12.ga.us or 404-232-1320.

Appreciate all that you do for Georgia's students!

Matt Jones  
Chief of Staff  
Georgia Department of Education

## Email Notice to Superintendents – After Posting

### Matt Cardoza

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**From:** Richard Woods <rwoods@doe.k12.ga.us>  
**Sent:** Tuesday, July 9, 2019 8:53 AM  
**To:** Matt Cardoza  
**Cc:** Matt Jones; Tiffany Taylor; Matt Cardoza; Meghan Frick  
**Subject:** Important - ESSA State Plan Amendment Posted

Superintendents,

The draft amendment referenced below, including our hold harmless request, is now posted at [gadoe.org/essa](http://gadoe.org/essa). Following 30 days of public comment, we will submit our proposed amendment to the U.S. Department of Education. I encourage you to share your feedback so that we can craft the strongest possible amendment that best meets the needs of students.

Many thanks,

Richard Woods  
State School Superintendent

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**From:** Matt Jones <mattjones@doe.k12.ga.us>  
**Sent:** Friday, April 26, 2019 2:47 PM  
**To:** K12 Superintendents <superintendents@list.doe.k12.ga.us>  
**Cc:** Matt Cardoza <MCardoza@doe.k12.ga.us>; Zelfhine SmithDixon <ZSmith@doe.k12.ga.us>; Allison Timberlake <ATimberlake@doe.k12.ga.us>; Meghan Frick <mfrick@doe.k12.ga.us>  
**Subject:** ESSA State Plan Amendment -- Students with significant cognitive disabilities

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Because the regular diploma is considered a property right, we cannot offer this new Alternate Diploma until a new cohort of ninth grade students begins.

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If you have questions concerning the ESSA amendment and its impact, please contact Matt Cardoza at [mcardoza@doe.k12.ga.us](mailto:mcardoza@doe.k12.ga.us) or 404-232-1320.

Appreciate all that you do for Georgia's students!

Matt Jones

Chief of Staff

Georgia Department of Education



## Email Notice to District Accountability Staff – After Posting

### Matt Cardoza

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**From:** Paula Swartzberg  
**Sent:** Tuesday, July 9, 2019 12:22 PM  
**To:** Paula Swartzberg  
**Cc:** Allison Timberlake; Matt Jones; Matt Cardoza; Meghan Frick; August Ogletree; Kris Dennis; Lacey Andrews; Tianna Sims  
**Subject:** FW: Important - ESSA State Plan Amendment Posted

Accountability contacts:

Please see the email below.

Thank you!  
Paula

Paula Swartzberg  
Director of Accountability  
Assessment & Accountability  
1554 Twin Towers East  
Georgia Department of Education  
205 Jesse Hill Jr. Drive  
Atlanta, GA 30334  
phone: 404-463-1539  
fax: 770-344-3448  
[pswartzberg@doe.k12.ga.us](mailto:pswartzberg@doe.k12.ga.us)  
<http://www.gadoe.org>

**From:** Richard Woods <[rwoods@doe.k12.ga.us](mailto:rwoods@doe.k12.ga.us)>  
**Date:** July 9, 2019 at 8:52:51 AM EDT  
**To:** Allison Timberlake <[atimberlake@doe.k12.ga.us](mailto:atimberlake@doe.k12.ga.us)>  
**Cc:** Matt Jones <[mattjones@doe.k12.ga.us](mailto:mattjones@doe.k12.ga.us)>, Tiffany Taylor <[titaylor@doe.k12.ga.us](mailto:titaylor@doe.k12.ga.us)>, Matt Cardoza <[MCardoza@doe.k12.ga.us](mailto:MCardoza@doe.k12.ga.us)>, Meghan Frick <[mfrick@doe.k12.ga.us](mailto:mfrick@doe.k12.ga.us)>  
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Appreciate all that you do for Georgia's students!

## Email Notice to District Special Education Directors – After Posting

### Matt Cardoza

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**From:** Zephine SmithDixon  
**Sent:** Tuesday, July 9, 2019 8:42 AM  
**To:** K12 Special Education Directors  
**Cc:** Matt Jones; Matt Cardoza; Meghan Frick  
**Subject:** Proposed ESSA Amendment Posted  
**Attachments:** ESSA State Plan Amendment -- Students with significant cognitive disabilities

**Importance:** High

Directors,

I wanted to let you know the proposed ESSA amendment, including our hold harmless request, is posted at [gadoe.org/essa](http://gadoe.org/essa). Comments can be emailed to [essa@doe.k12.ga.us](mailto:essa@doe.k12.ga.us).

Following 30 days of public comment, we will submit our proposed amendment to the U.S. Department of Education. I encourage you to share your feedback so that we can craft the strongest possible amendment that best meets the needs of students.

Zephine Smith-Dixon, Ed.D.  
State Director  
Division for Special Education Services and Supports/Suite 1870  
Cell: 404-987-1568  
Email: [zsmith@doe.k12.ga.us](mailto:zsmith@doe.k12.ga.us)  
[www.gadoe.org](http://www.gadoe.org)



## Email Notice to Special Education State Advisory Panel – After Posting

### Matt Cardoza

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**From:** Zephine SmithDixon  
**Sent:** Tuesday, July 9, 2019 8:45 AM  
**To:** Adreian Standard; Akilah Heggs Lee; Alecia Segurksy; Allen Mueller; Alyssa Barnes; Angela Slade; Anne Fernandez; Anne Ladd; Camela Mears; Christina Brown; Cynthia Glenn; Delephia Riley; Devon Orland; Donna Kosicki; Emily Woods; Erica Glenn; Ganesh Nayak; Gloria Glass; hillhe@clarke.k12.ga.us; James Butler; Jessica Davis; Jessica Land; Josette Franklin; Joya Carter-Hicks; Julia Rusert; Juree Hall ; Justine Ferrer; Kari Meyer; Karin Fisher; Kimberleigh Beard; Kimberly Washington; Lee Bryan; Leroy Hutchins; Leslie O'Neill; Lisa Lake; Lisa Newbern; Martha Jones; Matt Reese; Mitzi Proffitt; Pamela Piper; Pat Wolf; Patricia Grayson; Paul West; Rebecca Best; Renita Webb; Sabine Claster; Susan Moody; Tamyka Davis; Tangelo Early; Tanya Schlegel; Thaddeus Dixon; Tracie Doe; Yaasmeen Nyjah  
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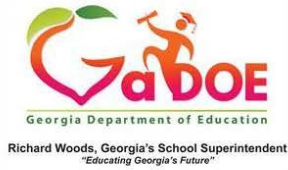
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Zephine Smith-Dixon, Ed.D.  
State Director  
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Cell: 404-987-1568  
Email: [zsmith@doe.k12.ga.us](mailto:zsmith@doe.k12.ga.us)  
[www.gadoe.org](http://www.gadoe.org)

**Special Education State Advisory Panel Meeting – Prior to Posting**

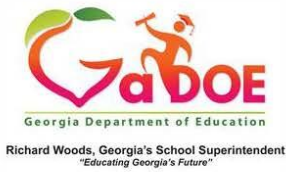


**Special Education State Advisory Panel (SAP)**

Meeting Agenda  
May 2-3, 2019  
Holiday Inn (Macon) North

**Thursday, May 2, 2019**

Time	Activity	Final Decision(s)
10:00 – 10:15 am	Welcome/Opening Activity Paul West, Chair Jurée Hall, Vice Chair	
10:15 – 11:15 am	GNETS Updates (Vickie Cleveland)	
11:15 am – 12:00 pm	Updated CO-Teaching Resources (Jeannie Morris)	
12:00 pm – 1:00 pm	LUNCH (PROVIDED)	
1:00 pm – 2:00 pm	Open Meetings Act Jennifer Colangelo Assistant Attorney General Office of Attorney General Chris Carr Government Services & Employment	
2:00 pm – 3:00 pm	Family Engagement & Dispute Resolution Updates (Jamila Pollard)	
3:00 pm – 3:30 pm	BREAK/CHECK-IN	
3:30 pm – 4:00 pm	SAP Committee Time (Advise next steps for the big trends shared through Public Comments during FY19)	
4:00 pm – 4:30 pm	Public Comment(s)	
6:30 pm	DINNER (PROVIDED)	



**Friday, May 3, 2019**

7:15 am – 8:00 am	BREAKFAST (PROVIDED)	
8:30 am – 8:45 am	Opening Activity/Team Building Paul West, Chair Jurée Hall, Vice Chair	
8:45 am – 9:30 am	SAP Committee Planning and Debriefing Time	
9:30 am – 10:30 am	Stakeholder Input about Graduation (ESSA Accountability Standards) (Matt Cardoza)	
10:30 am – 10:45 am	BREAK	
10:45 am – 11:30 am	Review of State Advisory Panel Operation Procedures for FY20	
11:30 am – 12:00 pm	Next Steps	

Please note that the times listed above are approximate and may change except the public comment period. Every effort is made to begin the public comment at the appointed time. Pursuant to Panel Policies and Procedures, a full 30 minutes is always allowed even if the start has been delayed. Comment time is limited 5 minutes per speaker so that all have a chance to be heard. For individuals desiring to make comment via telephone conference call, comment time needs to be scheduled with the SAP Chair a minimum of 3 business days prior to the meeting.

## Reminder Email Notice to District Special Education Directors – After Posting

### Matt Cardoza

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**From:** Zephine SmithDixon  
**Sent:** Friday, August 2, 2019 1:35 PM  
**To:** Adreian Standard; Akilah Heggs Lee; Alecia Segurksy; Allen Mueller; Alyssa Barnes; Angela Slade; Anne Fernandez; Anne Ladd; Camela Mears; Christina Brown; Cynthia Glenn; Delephia Riley; Devon Orland; Donna Kosicki; Emily Woods; Erica Glenn; Ganesh Nayak; Gloria Glass; hillhe@clarke.k12.ga.us; James Butler; Jessica Davis; Jessica Land; Josette Franklin; Joya Carter-Hicks; Julia Ruser; Juree Hall ; Justine Ferrer; Kari Meyer; Karin Fisher; Kimberleigh Beard; Kimberly Washington; Lee Bryan; Leroy Hutchins; Leslie O'Neill; Lisa Lake; Lisa Newbern; Martha Jones; Matt Reese; Mitzi Proffitt; Pamela Piper; Pat Wolf; Patricia Grayson; Paul West; Rebecca Best; Renita Webb; Sabine Claster; Susan Moody; Tamyka Davis; Tangelo Early; Tanya Schlegel; Thaddeus Dixon; Tracie Doe; Yaasmeen Nyjah  
**Cc:** Matt Jones; Matt Cardoza; Meghan Frick  
**Subject:** Proposed ESSA Amendment Posted

State Advisory Panel,

As a gentle reminder, August 8<sup>th</sup> will be the last date to give public comments.

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Zephine Smith-Dixon, Ed.D.  
State Director  
Division for Special Education Services and Supports/Suite 1870  
Cell: 404-987-1568  
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[www.gadoe.org](http://www.gadoe.org)



## Public Feedback

### Matt Cardoza

---

**Subject:** FW: GAA, Alternate Diploma, and Adjusted Grad Rate

**From:** Angie Ingram <[angieingram@walkerschools.org](mailto:angieingram@walkerschools.org)>

**Date:** July 17, 2019 at 4:14:09 AM EDT

**To:** Zephine SmithDixon <[ZSmith@doe.k12.ga.us](mailto:ZSmith@doe.k12.ga.us)>

**Subject: Re: GAA, Alternate Diploma, and Adjusted Grad Rate**

Thank you so much for your response! We are anxious to see how this all evolves once USED reviews the proposed changes!

On Tue, Jul 16, 2019 at 10:19 PM Zephine SmithDixon <[ZSmith@doe.k12.ga.us](mailto:ZSmith@doe.k12.ga.us)> wrote:

See below.

**From:** Angie Ingram <[angieingram@walkerschools.org](mailto:angieingram@walkerschools.org)>

**Sent:** Monday, July 15, 2019 8:29 AM

**To:** Zephine SmithDixon <[ZSmith@doe.k12.ga.us](mailto:ZSmith@doe.k12.ga.us)>

**Subject:** GAA, Alternate Diploma, and Adjusted Grad Rate

We received an assessment update last week with a link to the document that has been sent to USED regarding GAA, alternate diplomas, and adjusted grad rates. We completely understand that students assessed via GAA will have to receive a "different" diploma, but we are wondering if the alternate diploma will equate to a regular ed diploma or will it be more like the former special education diploma? **The Alternate Diploma is not a General Education Diploma; however, the credential will allow students to count in the numerator with the adjusted cohort as long as they have not aged out. Students who earn an alternate diploma will not have FAPE terminated.** We foresee parents asking that question, and there has been discussion among some of us as to what the meaning of this new diploma would be. We are planning on drafting a letter to parents of ALL our students assessed on GAA to ensure clear and timely communication regarding this change and we want to make sure we spell things out. **Please note that the change is not final. We are out for public comment and must submit to USED. The graduation board rule will need to update once approved.** Thank you in advance for feedback on this issue. And THANK YOU for your continued advocacy for students in GA! We truly appreciate your countless hours of time, talent, and work as our fearless leader!! **Let me know if there are other questions.**

--

Angie Ingram  
Director of Special Education  
Walker County Schools  
P: 706-375-9900  
F: 706-375-9907  
[angieingram@walkerschools.org](mailto:angieingram@walkerschools.org)  
925 Osburn Road  
Chickamauga, GA 30707

"It is the Mission of Walker County Schools to ensure all students graduate - Ready for College, Ready for Work, Ready for Life!"

**From:** [Claire Buck](#)  
**To:** [essa](#)  
**Subject:** ESSA Amendment  
**Date:** Thursday, August 8, 2019 9:01:33 AM  
**Attachments:** [image001.png](#)

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To Whom it May Concern:

I support the Georgia Department of Education's request to the U.S. Department of Education to not remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation. Georgia currently offers a special education diploma for students who complete their individual education plan goals, which recognizes their completion of high school but does not count as a regular diploma for the purposes of enrolling in higher education. This graduation option is intended only for students with cognitive disabilities that preclude their mastery of the regular high school course content, a small portion of all students with disabilities. I support this amendment being approved until the first cohort of students offered the Alternate Diploma would be expected to graduate.

Best regards,

Claire Buck

Claire Michael Buck, Ph.D.  
Chief Academic Officer  
Oconee County Schools  
34 School Street  
Watkinsville, Georgia 30677  
Phone: 706-769-5130  
Fax: 706-769-3509  
<http://www.oconeeschools.org>



COMMITTED TO STUDENT SUCCESS

**From:** [Holly Beasley](#)  
**To:** [essa](#)  
**Subject:** ESSA Amendment  
**Date:** Friday, July 12, 2019 7:58:56 PM

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Thank you for accepting feedback on the proposed ESSA amendment. I teach students with special needs at the middle school level. While none of the students I have worked with qualify for GAA, I do believe that offering an alternate diploma to those students who do qualify is a great step in making education more equitable for all our students. One concern I have is the stipulation that students must be identified at the beginning of their 9th grade year. This stipulation is fine for students who were born with their disabilities or for those who had early childhood trauma, but it disqualifies students who have health issues (such as a stroke) or are in accidents that causes brain trauma. These students should have access to a diploma as well, but may not be able to complete the requirements needed to receive a regular diploma. I feel there should be some form of consideration for these students as well.

Thank you,  
Holly Beasley

**From:** [Devon Orland](#)  
**To:** [essa](#)  
**Subject:** Change to the diploma  
**Date:** Friday, July 12, 2019 11:38:43 AM

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Good morning Georgia has misused the alternative assessment as a means to increase its graduation rates and avoid providing a real educational opportunity to any number of students. There should be no "grandfathering in" instead Georgia should be compelled to create meaningful diploma options.

Devon Orland, J.D.  
Litigation Director  
Georgia Advocacy Office  
(404) 924-4707

**From:** [Judy Adams](#)  
**To:** [essa](#)  
**Subject:** ESSA Proposed Amendment  
**Date:** Friday, July 12, 2019 3:00:49 PM

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Good afternoon and thank you for accepting feedback from the public on the proposed amendment. I teach students with special needs and all the students in my classroom are on the Georgia Alternative Assessment. I think this is an awesome opportunity for students with severe cognitive disabilities to have access to a regular diploma. This opportunity was not available to them otherwise. I do, however, believe that each case should be evaluated on a case by case basis. There are students who have worked their entire school career that have circumstance happen to them in high school that prevent them from getting a regular diploma, for example car wreck that causes brain injuries, illness that causes seizures which cause injury to the brain, tumor, etc. These students should not be penalized for circumstances beyond their control.

Thank you,  
Judy Adams

**From:** [Jeremiah Lutz](#)  
**To:** [essa](#)  
**Subject:** New amendment  
**Date:** Friday, July 12, 2019 9:10:05 AM

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I think it's a great idea to add an alternative diploma for students with significant cognitive disabilities. However, I think you should consider changing the requirements for students having to be identified before 9th grade. Some students may have traumatic brain injuries and could benefit from this!

**From:** [Eric Dean](#)  
**To:** [essa](#)  
**Subject:** ESSA Ammendment  
**Date:** Thursday, July 11, 2019 12:56:39 PM

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I feel that it is good that Georgia is thinking about trying other modes of diplomas especially since it is proposed to be standards based as well as being aligned with the state requirements for a regular diploma but it is something that will need to be carefully monitored. I also think that amending the dispute resolution report to 30 days (and 60 days if necessary) is a good idea as well so it will give more time to provide a more thorough report.

Thanks,  
Eric Dean

**From:** [Terry Kile](#)  
**To:** [essa](#)  
**Subject:** Feedback for ESSA  
**Date:** Friday, July 12, 2019 10:02:15 PM

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To ESSA,

I would like to take the time to add some feedback for the proposed ESSA amendment. I am a new teacher to special education but have worked with special education students for the past 5 years. I also have a daughter with Williams Syndrome who went through middle and high school by doing GAA. This program helped her tremendously. I believe that offering an alternate diploma to these students is a step in the right direction and is key to making them feel part of the school community, like they belong. They do belong and I am glad that Georgia is taking steps to show that all students matter.

--

*Terry Kile*

SPED Teacher  
Screven County Elementary / AIM  
1333 Frontage Road East  
Sylvania, GA 30467

SCMS Assistant Softball Coach

[terry.kile@screven.k12.ga.us](mailto:terry.kile@screven.k12.ga.us)  
School (912)451-2100  
Cell: (912)425-4045



**From:** [Nicole Holmes](#)  
**To:** [essa](#)  
**Cc:** [Dawn Welch](#)  
**Subject:** Proposed ESSA Amendment feedback  
**Date:** Wednesday, August 7, 2019 3:36:34 PM  
**Attachments:** [image010.png](#)  
[image011.png](#)  
[image012.png](#)

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The Cherokee County School District supports the proposed ESSA amendment. Oftentimes, our students with the most significant cognitive disabilities require the full amount of time that a free appropriate public education is available to them and an Alternate Diploma appropriately reflects their progress and achievement. Counting these students in the four-year cohort graduation rate, regardless of the year they receive this diploma, means that schools and districts are not penalized for doing what is right by students. Allowing a hold-harmless period for accountability purposes for the first cohort of Alternate Diploma students avoids an immediate negative impact to graduation rates that would be falsely based on changing how certain students are calculated in the rate rather than them completing a course study in an appropriate amount of time.

*Nicole H. Holmes, Ed.D.*

**Chief Academic Officer**



P O Box 769  
Canton, GA 30169

#770.704.4206

[Nicole.holmes@cherokeek12.net](mailto:Nicole.holmes@cherokeek12.net)



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## Support Letters

JOHNNY ISAKSON  
GEORGIA

<http://isakson.senate.gov>

131 RUSSELL SENATE OFFICE BUILDING  
WASHINGTON, DC 20510  
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ONE OVERTON PARK  
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ATLANTA, GA 30339  
(770) 661-0999

## United States Senate

WASHINGTON, DC 20510

July 16, 2019

VETERANS' AFFAIRS  
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SUBCOMMITTEE ON  
STATE DEPARTMENT AND USAID  
MANAGEMENT, INTERNATIONAL OPERATIONS,  
AND BILATERAL INTERNATIONAL  
DEVELOPMENT, CHAIRMAN

Secretary Betsy DeVos  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202-7100

Dear Secretary DeVos:

As the senior United States Senator for Georgia and a member of the Senate Health, Education, Labor, and Pensions Committee, I am writing to express my support for Georgia's request to amend its Every Student Succeeds Act (ESSA) State Plan. I fully believe that the policy outcomes laid out in this amendment are in the best interest of the students of our state.

Georgia is requesting permission to grant an Alternate Diploma to students with significant cognitive disabilities who are assessed using the alternate assessment. Students receiving this Alternate Diploma would count toward the four-year cohort graduation rate, regardless of the year they received their diploma, provided they graduated within the time period for which the state ensures the availability of a free appropriate education for students with disabilities. In Georgia, this is when a student has reached age 22.

This is a positive change for students with significant cognitive disabilities, and will allow schools to serve those students without being penalized if they do not graduate within their four-year cohort – which may not be what's best for that individual student. The change is supported by Georgia's Special Education State Advisory Panel (SAP).

As you also know, Georgia is requesting permission to not remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation until the first cohort of students offered the Alternate Diploma would be expected to graduate. In Georgia, the regular diploma is considered a property right, so we cannot offer the Alternate Diploma until a new cohort of ninth-grade students begins.

I am hopeful your Department will allow this, as the alternative is for schools to be penalized by a sharp decline in graduation rates that is not based on any actual change in policy or student outcomes. Graduation rates have a serious impact on the public perception of a school, of course, but more importantly the graduation rate is included in federal accountability. Our state is asking for the flexibility to avoid four years of inaccurate accountability measurements that would disproportionately impact small, underserved rural districts.

I appreciate your commitment to educational flexibility and your time in reviewing both Georgia's amendment request and this letter of support.

Sincerely,



Johnny Isakson  
United States Senator

## United States Senate

July 22, 2019

Secretary Betsy DeVos  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202-7100

Dear Secretary DeVos:

I am writing to express my support for Georgia's request to an amendment to its Every Student Succeeds Act (ESSA) State Plan. I fully believe that the policy outcomes laid out in this amendment are in the best interest of the students of our state.

I want to specifically request that all components of the amendment be considered and approved. As you know, based on the recommendation of your staff, Georgia is requesting permission to grant an Alternate Diploma to students with significant cognitive disabilities who are assessed using the alternate assessment. Students receiving this Alternate Diploma would count toward the four-year cohort graduation rate, regardless of the year they received their diploma – provided they graduated within the time period for which the state ensures the availability of a free appropriate education for students with disabilities. In Georgia, this is when a student has reached age 22.

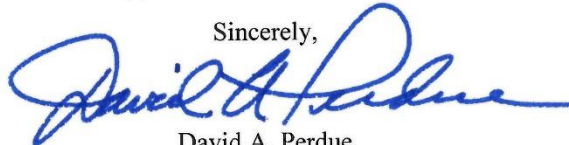
This is a positive change for students with significant cognitive disabilities, and will allow schools to serve those students without being penalized if they do not graduate within their four-year cohort – which may not be what's best for that individual student. The change is supported by Georgia's Special Education State Advisory Panel (SAP).

As you also know, Georgia is requesting permission to not remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation until the first cohort of students offered the Alternate Diploma would be expected to graduate. In Georgia, the regular diploma is considered a property right, so we cannot offer the Alternate Diploma until a new cohort of ninth-grade students begins.

I am personally extremely hopeful your Department will allow this, as the alternative is for schools to be penalized by a sharp decline in graduation rates that is not based on any actual change in policy or student outcomes. Graduation rates have a serious impact on the public perception of a school, of course, but more importantly the graduation rate is included in federal accountability. As a state, we are asking for the flexibility to avoid four years of inaccurate accountability measurements that would disproportionately impact small, underserved rural districts.

I appreciate your commitment to educational flexibility and your time in reviewing both Georgia's amendment request and this letter of support.

Sincerely,



David A. Perdue  
United States Senator

*Baldwin County Board of Education*  
*A Charter System of Georgia*

**Shannon D. Hill**

Board Chair

**Dr. Noris Price**

Superintendent

P.O. Box 1188

110 N. ABC Street

Milledgeville, GA 31059

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**Board of Education**

**Lyn Chandler, Vice Chair**

Wes Cummings

John Jackson

Dr. Gloria Wicker

August 7, 2019

Mr. Richard Woods  
State School Superintendent  
Georgia Department of Education  
205 Jesse Hill Jr. Drive, SE  
Atlanta, Georgia 30334

Dear Superintendent Richard Woods:

As you know, the United States Department of Education has made the decision to no longer count students with disabilities, who are assessed using the Georgia Alternate Assessment (GAA), and who earn a regular diploma, as "graduates" in the graduation rate. This decision by the United States Department of Education is of great concern to us in the Baldwin County School District.

This decision will most certainly have a negative impact on graduation rates. If we remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation before the first cohort of students, offered the Alternate Diploma would be expected to graduate, it will lead to misperception amongst our stakeholders in the school district as they may perceive that we are not meeting the needs of our special needs students. We serve many of our 12th graders for multiple years to ensure that they receive a free appropriate public education until they reach the age of twenty-two.

Having these students count as "dropouts" is misleading and not what we would want our parents and stakeholders to think. Penalizing this group of students and school

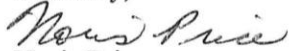


systems like ours, that meet the needs of our special needs students, is of concern to us. Our school district, like others across the state, works tirelessly to meet students' needs.

We are proud of our graduation rate, which is reflective of the efforts we put forth to ensure our student's complete school and enter post-secondary activities with success. We cannot stress enough how important it would be to offer the option of an Alternate Diploma so that we are not negatively impacted while trying to meet the needs of Georgia's most vulnerable group of students.

We respectfully request that the U.S. Department of Education approve our amendment request to avoid this outcome. We feel that unfairly labeling this group of students as dropouts should be avoided at all costs.

Sincerely,



Noris Price

Superintendent

Baldwin County School District





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(770)-229-3700 • [www.spalding.k12.ga.us](http://www.spalding.k12.ga.us)

## BOARD MEMBERS

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JAMES D. SMITH  
Superintendent

Accredited by AdvancED

August 7<sup>th</sup>, 2019

Mr. Richard Woods, Superintendent  
Georgia Department of Education  
Atlanta, Georgia 30334

Dear Superintendent Woods,

Griffin-Spalding Schools is very concerned following the U.S. Department of Education's decision to no longer count students with significant cognitive disabilities who are assessed using the alternate assessment, and who earn a regular diploma, as "graduates" in the graduation rate. We take pride in the quality of instruction provided to our students with significant cognitive disabilities and honor their hard work and commitment to graduation. We do not want our alternate assessment students' accomplishments to be disregarded during the transition by our state's Department of Education from a standard general diploma to a proposed alternate diploma.

In addition to the student impact, our district forecasts a significant drop in graduation rate if, as proposed, students taking alternate assessments are removed from the overall graduation rate total. This will negatively impact the district even though we are still providing what we consider as quality and appropriate services to students with significant cognitive disabilities. When looking at our graduation rates from last year, if students on alternate assessments were not included our overall graduation rate would have fallen 2.2 percent and our Student with Disabilities subgroup's rate would have fallen 18 percent. This is an unacceptable outcome and does not reflect the hard work of our district to increase graduation rates for all students.

Due to the negative student impacts and forecasted drop in graduation rate for the district and Students with Disabilities subgroup, we are strongly requesting a waiver of the removal of students on alternate assessment from graduation rate calculations until the state has been able to fully implement the proposed alternate diploma.

Thank you for the opportunity to express our concerns.

Sincerely,

James D. Smith  
Superintendent



## CALHOUN CITY SCHOOLS

*a tradition of excellence*

May 20, 2019

Matt,

I am writing to express Calhoun City Schools' concerns regarding the U.S. Department of Education (US Ed) decision that we can no longer count students with significant cognitive disabilities who are assessed using the alternate assessment, and who earn a regular diploma as "graduates" in the graduation rate.

We strongly agree that it would have a negative impact to remove students assessed with the alternate assessment who earn a regular diploma from the graduation rate calculation before the first cohort of students offered the Alternate Diploma would be expected to graduate. Our long standing excellent graduation rate would be negatively impacted and give the perception to the public that we are not meeting our students' needs. Like so many districts, we serve many of our 12th graders for multiple years so that they may receive a free appropriate public education until they reach 22. Having these students essentially count as "drop outs" is both misleading and not what we would want to present to both the general public and to the parents of these hard working students. Penalizing this group of students and the school systems who meet their needs is of great concern. Calhoun City and other districts across the state work tirelessly to meet students' needs and we are proud of our graduation rate which is reflective of the efforts we put forth to ensure our students complete school and enter post secondary activities with success. We cannot stress enough how important it would be to offer the option of an Alternate Diploma so that we are not negatively impacted while trying to meet these students' needs. We respectfully request that US ED approve our amendment request to avoid this outcome. We feel that unfairly labeling this group of students as dropouts is a discriminatory practice.

Thank you for your support of our students and schools.

Sincerely,  
  
Michele Taylor  
Superintendent

DR. MICHELE TAYLOR, SUPERINTENDENT

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