



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

March 7, 2022

Secretary Miguel Cardona  
Lyndon Baines Johnson (LBJ)  
Department of Education Building  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary Cardona:

As the District of Columbia responds to the COVID-19 pandemic, the Office of the State Superintendent of Education (OSSE) continues to prioritize the public health and safety of students and educators. At the same time, as the state education agency for the District of Columbia, we remain committed to providing accurate and actionable school performance data to use in our efforts to support and improve the performance of our schools. To better support our efforts, the District of Columbia requests approval of the included Accountability Addendum using the COVID-19 State Plan Addendum template and a waiver regarding one provision of the Elementary and Secondary Education Act related to supports for school improvement, pursuant to the process outlined in sec. 8401 (20 U.S.C §7861).

Section 8401(b)(3)(A) requires OSSE to: (1) provide the public and any interested local education agency in the State with notice and a reasonable opportunity to comment and provide input on the request to the extent that the request impacts the local educational agency; (2) submit the comment and input to the Secretary, with a description of how the State addressed the comments and input; and (3) provide notice and a reasonable time to comment to the public and local educational agencies in the manner in which the applying agency customarily provides similar notice and opportunity to comment to the public

OSSE is submitting this addendum and waiver request to the U.S. Department of Education, following engagement with LEAs and stakeholders regarding these requests. OSSE also posted a public request for feedback on the Accountability Addendum and waiver request on the OSSE Every Student Succeeds Act [website](#) on February 2, 2022, and accepted comment through March 2, 2022. In addition, OSSE presented at a public meeting of the DC State Board of Education (SBOE) on February 2, 2022, detailing the proposed plan and engaging in discussions on the proposal with members of the Board. Additionally, the plan was reviewed with LEA leaders and data managers at monthly meetings in February and was also included in weekly newsletters to LEAs, schools, and external stakeholders throughout the month.

As an enclosure, you will find the comments received from stakeholders across the District of Columbia.

In review of the submitted comments, please see the summary of responses and/or addresses to requests/suggestions for revision to the published plans. Nearly all of the comments received were supportive of OSSE's requests included within the Accountability Addendum and waiver.

***Response to public comment***

- 1) DC Charter Alliance: OSSE is committed to continuing to engage our stakeholders throughout this process and will thoroughly analyze the data and results from these calculations to ensure that the outcomes are consistent with the intent of the statute and OSSE's guiding principles related to accountability. OSSE will follow all statutory requirements should any additional changes to exit criteria or methodology be necessary.
  
- 2) EmpowerK12: OSSE is appreciative of the sentiments expressed related to the challenges and uncertainties of the data for school year 2021-22. The recommendation to designate schools for comprehensive support based solely on 2022 proficiency rates compared with those in 2019 is inconsistent with the requirements within the Every Student Succeeds Act and outside the scope of the provisions of the Accountability Addendum. We appreciate the eagerness to reconvene stakeholders to establish revised goals and accountability and support systems. We intend to reconvene stakeholders as a part of an amendment to our state plan for 2023, but that is outside the scope of this addendum and waiver request.
  
- 3) DC State Board of Education (SBOE):
  - a. Graduation rates – OSSE's plan proposes to use 4 -and 5-year adjusted cohort graduation rates (ACGR) in the high school Annual Meaningful Differentiation (AMD) calculation instead of 4-year ACGR and Extended year as outlined in the original state plan. The points previously assigned to extended year graduation rate will be assigned to 5-year ACGR under the addendum request. We revised language to clarify that intent within the addendum. With respect to any permanent changes to the framework, that would require an amendment to the state plan, which is not a part of this request.
  - b. In-seat attendance – OSSE will calculate in-seat attendance in the same manner which it was calculated in prior years, based upon the statewide attendance policy. Student attendance is reported daily by LEAs regardless of whether a student is attending school in-person or in a distance learning environment. Those data are used to calculate all attendance metrics consistent with the rules as outlined in the 2021 DC School Report Card technical guide.
  - c. System of Annual Meaningful Differentiation – OSSE included details on indicators able to be calculated and those unable to be calculated on pages 5 – 8 of the addendum document and included the points associated with each metric and the points per ESSA indicator on pages 9 and 10.

For additional clarity, OSSE has added a table similar to that which was shared with the SBOE during the presentation and discussion of the addendum as part of the narrative in this section and clearly outlined the metrics in each ESSA indicator under this revised AMD calculation.

- d. School Improvement - OSSE will provide an updated description of how schools are identified for school improvement designations in the technical guide as well as provide that detailed information on the school improvement website following approval of the accountability addendum and well in advance of any new school designations. This is consistent with the timeline and details shared at the February 2, 2022, SBOE meeting.
- 4) Jeff Schmidt:
- a. Long-Term Goals – any revision of the Long-Term other than the ability to shift the current goals forward one or two years, is outside the scope of the Accountability Addendum and would need to be done through an amendment to the State Plan. OSSE is not submitting an amendment to the state plan at this time and as such is not proposing to make additional changes to the goals.
  - b. Annual Meaningful Differentiation – the claim that OSSE is putting academic achievement at the end of six measures or reducing its weight in the system, is inconsistent with the addendum proposal as outlined on pages 8-11, which show that there are no changes proposed to the points assigned to academic proficiency measures in the current state ESSA plan.

Please contact Donna Johnson, Director of Accountability, by email at [DonnaR.Johnson@dc.gov](mailto:DonnaR.Johnson@dc.gov) if you have any questions regarding this request. Thank you for your consideration.

Sincerely,



Dr. Christina Grant  
State Superintendent of Education

Enclosures

cc' Sara Meyers, Deputy Superintendent  
Justin Tooley, Chief of Staff  
Evan Kramer, Assistant Superintendent  
Donna Johnson, Director of Accountability