



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

PROPOSED WAIVER REQUEST: District of Columbia Waiver Request- 1003 funding extension for comprehensive support schools to align with revised exit timeline

OSSE is providing this draft letter that outlines its waiver request from the Elementary and Secondary Education Act (ESSA) from provisions relating to extending the timeline for funding support for comprehensive support schools. In order to request a waiver to the US Department of Education, states must make waiver requests available to the public for notice and comment consistent with 20 U.S.C. §7861. OSSE will submit received comments with the waiver request to USED upon submission. Comments may be submitted until March 2, 2022 by submitting them to dcschoolreportcard@dc.gov.

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 a waiver of one provision of the Elementary and Secondary Education Act pursuant to the process outlined in sec. 8401 (20 U.S.C §7861).

Waiver Request: School Improvement support funding duration

Describes which Federal statutory and regulatory requirements are to be waived

Sec. 1003(c) (20 U.S.C. 6303) of the ESSA states that each SEA shall award each subgrant under subsection (b) for a period of not more than 4 years, which may include a planning year. Section (b) outlines the uses and allocation portions of 1003 school improvement funds for LEAs serving schools who are implementing comprehensive or targeted support and improvement activities.

As a component of the 2022 ESSA Accountability Addendum, DC proposed revising the timeline for currently designated comprehensive support and improvement schools to exit before taking more rigorous

State-determined action. DC elected to not count the 2019-20 and 2020-21 school years from this timeline due to accountability waivers and impacts from the pandemic on schools' ability to implement and measure progress related to their plans and exit criteria. The revised timeline for schools will be:

	Designation Year (Year 1)	Year 2	Year 3	Year 4 (option)
Original	2018-19	2019-20	2020-21	2021-22
Revised	2018-19	2021-22	2022-23	2023-24

Describes how the waiving of such requirements will advance student academic achievement

In response to the COVID-19 pandemic and to protect the health and welfare of students and educators, OSSE received a waiver from accountability requirements of ESSA for the 2019-2020 and 2020-21 school years. Additionally, OSSE received waivers from all statewide assessments during the 2019-20 school year and from statewide assessments in ELA, math and science during the 2020-21 school year. Consistent with those waivers, OSSE did not calculate overall accountability scores and ratings using its system of annual meaningful differentiation, the School Transparency and Reporting (STAR) Framework. In 2020 and 2021, OSSE continued to monitor and evaluate the progress of each school currently designated for comprehensive support and improvement. Through these evaluations and with deep understanding of the limitations of the data to measure progress OSSE recognized the importance of extending the timeline for continued implementation of the initiatives to improve student performance and to additionally address unfinished learning and gaps deepened by the impacts of the pandemic.

Within the 2022 ESSA Accountability Addendum, SEAs were provided the opportunity to exclude the two years for which they had accountability waivers from the timeline for schools to exit or have more rigorous state-determined action. OSSE believes extending this timeline will advance student academic achievement by enabling schools to maintain continuity in supporting their students and implementing revised plans for demonstrating significant progress and improvement in student performance and readiness. We are requesting to extend the use of school improvement funds as outlined under section 1003 of the ESSA during this revised timeline in order to fully support these practices, programs and plans which are targeted specifically at students' areas of academic needs.

Each school developed an improvement plan when they were initially designated for comprehensive support and improvement. Those plans were approved by their LEA and then submitted for approval by OSSE. Schools have reviewed progress against their goals, evaluated this progress with LEA and SEA leaders, and made necessary adjustments as they measure the impact and success of initiatives within their plan. Continued fiscal support of these schools through the revised exit timeline for these initiatives will allow these plans to be fully implemented as intended and directly support improved student and school outcomes. OSSE plans to identify additional schools for improvement and support in 2022 and will also utilize 1003 school improvement funds to support the newly designated schools performing in the lowest 5% for comprehensive support as well as continue to support the schools on this revised exit timeline.

Describes the methods the State educational agency, local educational agency, school, or Indian tribe will use to monitor and regularly evaluate the effectiveness of the implementation of the plan

OSSE will continue to regularly monitor and evaluate the progress and implementation of improvement plans and expenditures of school improvement funds from all designated schools and LEAs. Following the 2021-22 school year, OSSE will utilize all available accountability and assessment data to determine how best to use them in improving programs and supports for all students and schools. As soon as OSSE

is able to resume the calculation of academic growth and additional progress metrics, it will use that data along with data which is collected and reported by the school related to school progress and improvement.

OSSE will use the school improvement plans submitted by the LEAs for each school designated for comprehensive improvement as well as the data and information shared about the performance of all schools through the [DC School Report Card](#). OSSE will continue to expect LEAs and designated schools to provide the progress they are making toward making their goals and will suggest and propose intervention where the data suggests that the initiatives are not resulting in progress toward objectives.

We appreciate your attention to this matter. Enclosed you will find the public comments submitted in response to this waiver request.

Sincerely,

Dr. Christina Grant
State Superintendent of Education

Enclosures