



July 8, 2022

Dr. Christina Grant
 State Superintendent of Education
 Office of the State Superintendent of Education
 1050 First Street NE
 Washington, DC 20002

Dear Superintendent Grant,

The D.C. State Board of Education (State Board) appreciates the opportunity to provide public comment on the Office of the State Superintendent of Education's (OSSE) 2022 Every Student Succeeds Act (ESSA) State Plan Amendment.

Pursuant to §38–2652(a)(7), the State Board has the approval authority over the state accountability plan for the District of Columbia developed by OSSE. The State Board appreciates OSSE's ongoing engagement in both the statewide accountability amendment process and the upcoming engagement on the D.C. School Report Card.

OSSE's proposed 2022 ESSA State Plan Amendment addresses many of the challenges related to measuring school performance during the last two years of the COVID-19 pandemic and the State Board appreciates many of the decisions that went into the amendment, including striving for valid and equitable metrics in the annual meaningful differentiation of schools, eliminating the School Transparency and Reporting (STAR) Rating, and explicitly replacing PARCC language with "statewide assessments".

The State Board also has a number of concerns and urges revisions based on the resolution adopted unanimously by the State Board in [SR22-1, STAR Framework Recommendations](#). Specifically, we recommend the following, summarized below in order of appearance in the proposed [redline version of OSSE's proposed ESSA State Plan Amendment](#).¹

- ***Access to Opportunities (Pages 23 & 26)*** – The State Board recommends returning strikethrough language on the importance of access to opportunities for this upcoming school year and ensuring promoting the measurement of students' access to a **well-rounded education**, specifically one that measures the extent to which schools provide adequate time for science, social studies, and arts. If such a measure does not lend itself to inclusion in the meaningful differentiation formula as OSSE has argued, we urge that

¹ All fall under the DC State Plan's Section 4. *Statewide Accountability System and School Support and Improvement Activities* (ESEA section 1111(c) and (d));





OSSE acknowledge the importance of this measure and commit to developing and including it as part of the D.C. School Report Card.

- ***Additional Measures for Consideration in Future Years of the Accountability System (Page 26)*** – The State Board recommends returning all strikethrough language regarding the importance of **school climate surveys** in the accountability framework. School climate metrics were recommended in public testimony and community engagement feedback to the State Board in 2021, as well as expert witness testimony presented to the State Board in 2021 during public meeting panels in May and June and during its May 2021 Assessment and Accountability Committee meeting. Such data should serve as leading indicators that help inform state and Local Education Agencies (LEAs) to support schools as part of the state accountability framework. If it is not possible to develop such a measure in time for the next D.C. School Report Card, we urge that OSSE acknowledge the importance of school climate measures and commit to developing and including them as part of subsequent D.C. School Report Cards.
- ***Annual Meaningful Differentiation (Page 28)*** – The State Board recommends **keeping special education weights** as part of the accountability framework. This is intended to help increase the focus on historically marginalized students and reduce the association with student socioeconomic levels.
- ***Annual Meaningful Differentiation (Page 28)*** – The State Board members² voted unanimously to recommend **removing a single, summative rating** from the D.C. School Report Card. The State Board looks forward to ongoing engagement with OSSE on any proposed changes to the D.C. School Report Card, including the display of metrics and calculations described in this amendment.
- ***Annual Meaningful Differentiation (Page 34)*** – The accountability framework must be used as a tool for support. As such, the State Board recommends replacing non-specific language regarding supporting targeted schools with **more specific language that calls for using the data on specific indicators to target relevant assistance/supports to specific schools**. The State Board also recommends adding language stating the State Superintendent will provide additional schools beyond those in the bottom 5 percent the opportunity to develop a School Quality Review (SQR) that includes members of the school community, leading to specific recommendations for improvement that the school may implement. The State Superintendent should also monitor assistance, school performance, and improvement on key indicators annually and provide additional, targeted support where needed.

² At the State Board’s January 19, 2022 public meeting, State Board members voted seven (7) “yays” to two (2) “nays” on *Wattenberg-Reid’s SR22-1 STAR Framework Recommendations (“Amendment 1”)*; Amendment 1 addressed the elimination of a single summative rating of schools and added text to the resolution related to states that do not currently report a summative rating as part of their accountability system.





Lastly, the State Board recommends OSSE to provide transparency on how it plans to incorporate public comments into the final ESSA State Plan Amendment.

The State Board understands that OSSE is soliciting public comment on its ESSA State Plan Amendment through Friday, July 8, 2022, and is fully committed to working alongside you and your staff as this amendment is finalized.

Sincerely,

The D.C. State Board of Education





July 7, 2022

Dr. Christina Grant
Superintendent
Office of the State Superintendent of Education
1050 First Street, NE, Washington, DC 20002

Dear Superintendent Grant:

On behalf of the DC Public Charter School Board (DC PCSB), I wish to express our support for revisions to the District of Columbia Office of the State Superintendent of Education (OSSE) Every Student Succeeds Act (ESSA) Plan 2022.

As the sole charter school authorizer in Washington DC, DC PCSB recognizes the impact OSSE's amendment will have on students, schools, families, and stakeholders. We understand the key priority focus areas are: 1) Improve equity; 2) Better reward growth; and 3) Strengthen measurement of priority areas (gap closure for historically underserved students, college and career readiness, students with disabilities, and attendance). We appreciate the increased weight given to student growth metrics, and fully understand the plan to increase the weight for performance for the economically disadvantaged student population, and decrease the weight for the all-students group, therefore reducing the association between accountability calculations and school socio-economic levels. Finally, we understand this amendment will not include a STAR rating for each school.

We support OSSE's commitment to sharing available and appropriate data with the public and are encouraged by the community engagement that informed these revisions. For these reasons, DC PCSB supports this addendum.

Please feel free to contact me with questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michelle Walker-Davis". The signature is fluid and cursive, with a large loop at the end.

Dr. Michelle Walker-Davis
Executive Director



VIA EMAIL

July 8, 2022

Christina Grant
State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Superintendent Grant:

DC Public Schools appreciates the opportunity to provide public comment on the Office of the State Superintendent of Education (OSSE) proposed changes to DC's ESSA State Plan for Accountability. As the largest LEA in DC, serving nearly 50,000 students, we work every day to ensure that every school guarantees students reach their full potential through rigorous and joyful learning experiences provided in a nurturing environment.

OSSE's proposed changes address many of the challenges related to equitably measuring school performance across schools. DCPS appreciates the focus on metrics that better reward growth and strengthen measurement in priority areas. Our agency's responses to OSSE's proposed shifts and how they align with our equity commitments are detailed below:

- **Removal of STAR Rating:** The removal of the STAR Rating is an important signal to all DC residents and stakeholders that OSSE understands school quality cannot be solely described by the number of stars a school receives on a limited number of metrics.
- **Revised Weights for Economically Disadvantaged and Race/Ethnicity:** Increasing the weight of the economically disadvantaged student group and decreasing the weight of the all-students group will allow all schools in DC to have important conversations about how schools are best serving their students with the greatest need. Additionally, the focus on the economically disadvantaged subgroup data will encourage collective discussion and understanding of how we as a city best support students who find themselves at-risk for factors they have no control over.
- **Chronic Absenteeism Metrics:** DCPS fully supports a shift to measuring chronic absenteeism and chronic absenteeism growth. Measuring chronic absenteeism will provide schools with more actionable data, and better capture the impact of school level interventions and initiatives related to improving student attendance.
- **High School Metric Revisions:** DCPS agrees with the revision to the high school metrics, specifically:
 - **ACGR:** Combining both 4-year and 5-year ACGR under one metric acknowledges that many schools support students beyond their 4th year in high school.
 - **Removal of SAT Percentile Metric:** Removing the SAT DC Percentile metric is another important effort to increase equity in accountability systems given the metric strongly associates with socio-economic levels and there is little meaningful differentiation across schools.
 - **Addition of HS Growth Metric in ELA and Math:** Adding a relative growth metric for ELA and Math has the potential to recognize the ongoing commitment to academic growth in high school.

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- **Revised ACCESS Growth Methodology:** The revised approach appropriately utilizes non-linear targets in recognition that targets should be based on year-to-year growth.

DCPS has also identified several metrics and processes that would benefit from additional clarity and/or expansion to better meet the needs of all students.

- **Expansion of AP/IB/Dual Enrollment Participation to Include CTE Coursework:** DCPS is committed to ensuring students are prepared to reach their full potential in college, career, and life. Starting in middle grades at DCPS, students can take part in Career and Technical Education elective courses and work-based learning. Students in our high schools can take part in 25 distinct Career Education programs of study at 16 high schools that integrate academic, technical skills, and industry specific training. Alongside these courses, we offer opportunities for work-based learning, internships, and pre-apprenticeships. Our students also benefit from articulation agreements that enable them to earn college credit for some CTE coursework, and dual enrollment with local colleges and universities. For that reason, DCPS would strongly encourage OSSE to add the following metrics: participation in CTE coursework, completion of a CTE pathway, receipt of an industry certification.
- **Metrics for Opportunity Academies:** DCPS is proud of our Opportunity Academies (OAs) in DCPS (Ballou STAY HS, Luke C. Moore HS, and Roosevelt STAY HS), where students are able to partake in a personalized competency-based learning program to ensure that all students in the district, regardless of age, have a positive pathway to post-secondary success. Our OAs remain committed to accepting students regardless of age, or previous academic attainment, but the current accountability system does not reflect this – applying a traditional approach to schools that are designed to serve students with unique needs. We would encourage OSSE to include new metrics for identifying school performance for our alternative schools, similar to metrics Colorado, New York City, and Wyoming have implemented, that might encompass the following elements:
 - Increasing the extended-year adjusted cohort graduation rates to include six-, and seven-year rates;
 - Calculating school-specific graduation growth targets based on data from the previous school year;
 - Tracking credit accumulation per year, instead of or in addition to promotion and completion, to better capture progress towards graduation;
 - Creating an Opportunity Cohort Graduation Rate (OCGR) that assigns students to a graduation cohort based upon credits at the time of enrollment, rather than age or original first ninth grade year;
 - Recognizing that students whose first enrollment occurs after the age of 18 are not required to attend an educational institution and should not be counted as dropouts if they leave prior to completing their degree;
 - Measuring reengagement rates to recognize schools that keep students enrolled who have previously dropped out;
 - Establishing peer comparison benchmarks for alternative schools to better measure school quality and success;
 - Adding a metric to gauge student perception of school climate;
 - Factoring in other college and career preparation metrics such as enrollment in vocational training, or public-service programs.
- **Pre-K Attendance:** We recognize that the attendance habits caregivers build during these years are correlated with future attendance, however, we would recommend any credit related to this metric be calculated outside of the overall summative score to encourage schools to work on growth in this area despite parent autonomy. Pre-K attendance is not compulsory in DC, and its inclusion will disproportionately impact school communities where parents exercise their discretion in early childhood attendance.

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- **Academic Growth and Attendance Growth Metrics:** Additional information is needed on how OSSE plans to calculate growth for schools and/or students in the attendance and high school achievement metrics – including additional clarity around the existence of MSAA 3+ in both the Academic Achievement and Academic Growth categories.
 - **Revised Weights and Student Subgroups:** Additional information is needed on the minimum subgroup size OSSE will use for the economically disadvantaged and race/ethnicity subgroups in accountability calculations. We recommend keeping the subgroup size at 10, which protects the personally identifiable information of individual students while also ensuring more complete data is reported.

Thank you again for your continued collaboration as we work to ensure that all students receive a well-rounded educational experience, and feel loved, challenged and prepared while attending our schools.

Sincerely,



Lewis D. Ferebee, Ed.D.
Chancellor

Received via email

Subject: Public Comment on OSSE's Accountability Revisions

From: Stu Smither Wulsin

To: OSSE.ESSA@dc.gov, Hilary Darilek

Dear Sir or Madam:

The below public comment represents the feedback from E.L. Haynes Public Charter School on the key principles and proposed changes outlined in the ESSA Amendment – Accountability Revisions Presentation.

KEY PRINCIPLES

- Improve equity
 - We support the principle of improving equity in measuring performance. We believe that schools are only excellent if they support students of every race, socioeconomic status, home language, and ability.
- Better reward growth
 - We support the principle of better rewarding growth. Schools can only impact the amount students learn once they enroll and school quality measures should reflect how well schools help students grow.
- Strengthen measurement of priority areas
 - We agree that the areas identified as priorities for strengthening measurement deserve increased attention (Gap closure for historically underserved students, College and career readiness, Students with disabilities, Attendance).

SPECIFIC CHANGES

- Definition of Economically Disadvantaged
 - We support replacing the at-risk subgroup with “Economically Disadvantaged”. Removing over-age from the definition of the at-risk subgroup enables the definitions and comparisons to be more consistent across grade spans.
- No changes to Students with Disabilities
 - Given the size of the Students with Disabilities subgroup, we support the decision not to further disaggregate it for calculations.
 - We look forward to being able to view the disaggregated data in separate reports.
- ACCESS Growth
 - We support the decision to change the ACCESS exit criteria from 5.0 to 4.5 given the structure of the new ACCESS test.
 - We look forward to seeing the specific business rules about how ACCESS growth targets will be set annually. We hope the formulas are published as soon as possible, enabling schools to calculate students' targets before the school year begins.
- Attendance Metrics

- While we understand that 90% attendance and Chronic Absenteeism are mathematically equivalent, we would prefer to keep the positive framing of 90% attendance. It may lead to confusion and will be harder for parents and families (and other audiences) to interpret and understand the scores when there is only one metric on the report where lower scores are better than higher scores.
- While we understand that we are no longer able to include “best of” metrics, we strongly recommend that the business rules for attendance growth are written in a way that schools with high attendance rates are not penalized for low growth.
- High School Growth
 - While we support the goal of measuring student growth in high school, we fear that using Algebra and Geometry PARCC tests to do so will produce results that do not reflect actual student learning growth as the tests measure unique standards in these two mathematics courses. We are glad that OSSE is delaying the inclusion of these measures and we strongly recommend that rigorous evaluation of potential methodologies is conducted prior to adopting a HS growth metric.
- Graduation Rates
 - We support including both 5-year ACGR and 4-year ACGR in the accountability system.
- Dual Enrollment
 - We support adding dual enrollment to the AP/IB participation metric.
- SAT DC Percentile
 - The SAT DC Percentile metric served as a rough equivalent for older students to the “Approaching Expectations on PARCC” for younger students. We fear that removing it will make it harder to see improvements for lower-performing students who may be getting closer to the College Ready benchmark but are not quite there yet.
- Increase weight of student growth metrics for Elementary/Middle
 - We support the decision to increase the weight of student growth metrics for elementary and middle school report cards.

STUDENT GROUP WEIGHTS

- Increased weight for Economically Disadvantaged and Race/Ethnicity
 - We support the decision to increase the weight for Economically Disadvantaged and Race/Ethnicity subgroups. We believe accountability systems should measure how well schools teach their students, and not place more relative emphasis on how well prepared students are before enrolling in a school.
 - We also believe the changes to group weights will do a better job of controlling for demographics and representing a school’s impact on students’ learning across a wider range of learning needs.

Thank you,

Stu Smither Wulsin

Received via email

Subject: EmpowerEd Public Comment on ESSA Accountability Framework

From: Scott Goldstein

To: OSSE.ESSA@dc.gov

CC: Sarah Cole, Maya Baum, Armand Cuevas, Raymond Mullings, Cody Norton

This public comment is from EmpowerEd's Equity Team Teacher Leaders:

Celebrations

- We applaud the removal of the SAT DC Percentile metric “which showed strong association with socio-economic levels and little meaningful differentiation across schools” and we would like to see OSSE take advantage of all opportunities to remove data metrics from standardized tests that are shown to be biased.
- We applaud the shift in the ACCESS score from 5 to 4.5 as we’re aware that as the test has changed it’s become difficult sometimes for students to achieve a score to test out of services even if educators working with believe they no longer need services.
- We’re excited about moving away from measuring In School Attendance and replacing it with an attendance growth metric. We would like to remove attendance all together, but given the federal requirement, this is a good shift.

Concerns

- The overall amendment is still a minor tweak in favor of equity, missing a huge opportunity to do something transformational, even within the federal requirements. In the areas where the state has flexibility, OSSE is continuing to rely on indicators that have too strong a correlation to socio-economic status and choosing an over-reliance on biased and flawed test score data.
- In general, OSSE makes claims that changes, such as "replac[ing] 90% attendance with Chronic Absenteeism," will "Increase Equity" without consistently providing explanations of how the changes will increase equity. We believe further clarification and evidence that supports this making a meaningful difference is needed. Some of the explanations provided in the slideshow aren't convincing.
- We’re not convinced that increasing the weight of the “economically disadvantaged” student group will increase equity. We are confused about how the pair of changes outlined here will reduce the association of these calculations with socioeconomic levels. It seems like this formula would cause neighborhood schools in poorer neighborhoods to do worse than schools with "economically disadvantaged" students coming from more affluent neighborhoods. We do support a focus on how schools serve economically disadvantaged students for the purpose of providing schools the supports they need, but not for the purpose of comparing schools- which would be deeply inequitable and this is why...
- We understand that graduation rates are a required category in high school, but continue to be concerned about the impact of this measure on schools that receive students mid-year

particularly from other countries at the conclusions of their school year in Central America. This could disproportionately impact schools like Roosevelt HS, Cardozo HS and others and make it appear as if they are not graduating students they had significantly less control over.

- Any proposal that still includes an “overall score” undermines the effort to increase equity and school supports. An “overall score” is no different than a “summative rating” if a 1-100 number would be prominently identified in a way that could be confused as a signal of school quality rather than a score generated by metrics imposed by federal regulations used to identify schools needing additional support. Does OSSE truly believe that DC students, families, educators and other stakeholders don't convert 1-100 numbers to "grades" in their heads? This is how the education system's grading system has trained us. Number scores are ratings. OSSE should not pretend differently. While some of these OSSE efforts may make a difference in reducing the bias, federal constraints still leave us with a heavily biased calculation, and thus the overall score as determined by this calculation should not be displayed as if DC believes it to be an equitable and fair determination of school quality, but simply the required formula to determine schools that will receive support per federal guidelines.

Recommendations

- Given that growth data is shown to hold less bias, we recommend OSSE consider other opportunities other than ACCESS and attendance data to replace achievement-type data with growth data in their accountability calculations.
- If an overall accountability score will be shared with the public, OSSE must consistently (in every place it is displayed) flag with a notice such as "controversy surrounds the fairness/equity of this measure, which the federal government requires OSSE to calculate. In an effort to promote transparency, we have made these scores accessible to the public, but this is intended to be a measure of school accountability on federal standards, not a measure school quality. For a full picture of school quality information, please refer to our school dashboards here (with link)."
- OSSE must publicly commit before the SBOE vote on the ESSA amendment in July that phase two focused on the school report card will include a public facing dashboard that includes, at a minimum, a measure of school climate, well-rounded education and teacher retention, diversity and experience. While OSSE will conduct its own engagement, the track record clearly shows that engagement from the State Board of Education, and outside groups like EmpowerEd, will produce far more public response. Given that these groups have already engagement more than one thousand DC residents and school climate, well-rounded education and teacher retention, experience and diversity were consistently at the top of public school parent and resident concerns with quality- OSSE can commit to this now. Without this step, OSSE is proposing a tweak towards equity, when what we need is transformation.
- OSSE should publicly commit before the SBOE vote on the ESSA amendment, to create a new system of school supports that go beyond the federally required support for the “bottom 5 %” that is tied to specific indicators on the dashboard- for example- a system in which schools who receive low ratings on teacher retention would be prioritized for grants to focus on improving retention, or schools with low ratings on well-rounded education would be prioritized for funding for additional world language teachers, science partnerships, extracurricular school partnerships, etc...

- OSSE should publicly commit before the SBOE vote on the ESSA amendment to developing a “school climate” metric and a “well-rounded education” metric by an established date and including at least the school climate metric in the ESSA framework once the validity has been established, as is done in several other states.
- OSSE should publicly commit before the SBOE vote on the ESSA amendment to not prominently display the “overall” or “summative” score calculated on the school report card, and to the other pages controlled under the executive that parents use to search for schools- including DCPS school profiles pages and My School DC. In all three places, and any others under the executive's control, no overall score or rating shall appear on the front page or next to a school's name.



July 7, 2022

Dr. Christina Grant, State Superintendent of Education

Office of the State Superintendent of Education

1050 First Street NE

Washington, D.C. 20002

Dear Dr. Grant,

We are pleased to submit a public comment to the Office of the State Superintendent of Education (OSSE) regarding its proposed amendment to the Every Student Succeeds Act (ESSA) State Plan for Accountability. OSSE must make bold changes and adopt new ways of thinking so that all our students recover from the COVID-19 pandemic and have a just and equitable public education in the District.

In February, 50 members of our community wrote a [letter](#)¹ urging you to adopt five recommendations that would improve accountability in our public education system, namely:

1. Re-strategize and refocus outreach efforts to ensure that families in all eight wards know that the D.C. School Report Card and Transparency and Reporting

¹ February 23, 2022. "ERN D.C. Submits Letter to OSSE Superintendent on STAR Framework." <https://edreformnow.org/dc/12597/>



(STAR) Framework is a tool they can use to help them make decisions about schools.

2. Get buy-in from families and D.C. residents in all eight wards, particularly those furthest from opportunity, on how best to use the D.C. School Report Card and STAR Framework to serve their students better.
3. Improve, but do not eliminate the single summative rating.
4. Administer the district-wide annual assessment exam this spring.
5. Get serious about innovation and school improvement.

We are pleased to see the adoption of the first four recommendations and look forward to seeing progress on the fifth. As OSSE considers advancing its proposed amendment to the ESSA State Plan for Accountability, we urge you to ensure all changes are equitable, accessible, and transparent. Therefore, we offer the following eight recommendations to improve the amendment:

- Increase the weight of the “students with disabilities” student group
- Increase the weight of students of color within the race/ethnicity student group, while holding them to high standards
- Remove median growth percentile
- Ensure D.C. has an effective statewide annual assessment
- Incentivize the expansion of dual enrolment and dual credit as a school quality & student success indicator
- Include structured literacy training for all educators in elementary schools
- Provide clear information on school quality
- Harness the accountability system to support schools



Guiding Principle #1 - Equity:

Increase the weight of the “students with disabilities” student group

We applaud many of the changes OSSE makes to the student groups, including changing the term “at-risk” to “economically disadvantaged²” and increasing the “economically disadvantaged” weight from 5% to 40%. With these changes, OSSE is demonstrating an understanding that our accountability system must prioritize and serve student groups who are furthest from opportunity, which is a step in the right direction. Because placing a greater emphasis on serving students furthest from opportunity is the right and smart thing to do, **OSSE should also increase the weight of the “students with disabilities” subgroup.** Students with disabilities experience the most significant challenges in public education in D.C, particularly students of color who are economically disadvantaged with disabilities. Students with disabilities have the lowest PARCC exam scores in ELA and Math³ and the lowest graduation rates.⁴ They also are more likely to be discriminated against, disciplined, and not attend college. We also know that the COVID-19 pandemic only exacerbated these inequities. **OSSE should increase the weight of the students with disabilities subgroup by taking five points from the “all students” group and applying it to a new subgroup, “economically disadvantaged students with disabilities.”**

² Why changing the designation “at-risk” is necessary Source:

<https://www.washingtonpost.com/education/2022/04/09/dc-schools-at-risk-kids/>

³ PARCC exam, p. 12 source:

https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/2019%20Statewide%20ELA%20and%20Math%20Public%20Results.pdf

⁴ 2020-2021 High School Graduation, source: <https://osse.dc.gov/service/high-school-graduation-rates-0>



Increase the weight of students of color within the race/ethnicity student group while holding them to high standards

Currently, OSSE proposes 15 percent for the race/ethnicity student group, divided evenly between all race/ethnicity student groups. Dividing evenly between all groups undermines the purpose of having the metric there in the first place. **We recommend that OSSE keep the overall 15% weight but increase the weight of students of color within the race/ethnicity student group.** OSSE must hold students of every race and ethnicity to the same high expectations while acknowledging the harmful impact that racism has on marginalized groups.

Remove Median Growth Percentile

We must hold all schools to high standards when preparing our students for life, school, and career. By using median growth percentage, OSSE focuses on how well a student is doing compared to their peers across the District and the country, rather than whether they are growing towards grade-level expectations. This change will likely hide where our problem spots are in public education by relying on relative, rather than absolute, growth. **We recommend placing the entire growth weight in Growth-to-Proficiency and Approaching Expectations and removing Median Growth Percentile.**

Ensure D.C. has an Effective Statewide Annual Assessment

Because there have been hundreds of years of racism, discrimination, and lowered expectations for students of color within our public education, it is vitally important that we have objective academic measures that can be reliably and validly measured within



our accountability system. With that said, we are disappointed that OSSE appears to be moving away from the PARCC exam. **We urge OSSE to keep PARCC,⁵ or at least a high-quality statewide annual assessment with the following crucial features:**

- Culturally responsive
- Offer Smarter Balance Assessment
- Assess both problem-solving and critical thinking
- Ensures student learning aligns with the Common Core standards
- Offer numerous accommodations for students with learning challenges and disabilities
- [Make the data more useful for students and families⁶](#) by providing rapid results — paired with the key academic standards we should focus on next with our students — along with access to resources explaining how parents can support

Guiding Principle #2 - Accessibility:

Incentivize the Expansion of Dual Enrolment and Dual Credit as a School Quality & Student Success Indicator

We support the addition of a dual enrollment indicator and would encourage the addition of dual credit. States across the country are *moving away* from a model which only affords students with dual enrollment courses for college credit *towards* a model which allows students to receive both high school *and* college credit for

⁵ April 18, 2022. “Artecka Brown: Why I’m one of the many parents who want the PARCC exam this year” Source cited: <https://thedcline.org/2022/04/18/arteck-brown-why-im-one-of-the-many-parents-who-want-the-parcc-exam-this-year/>

⁶ March 2022. “FAMILY GUIDE TO ASSESSMENTS: Questions to Ask About Your Child’s Assessment Results and Why They Matter” Education Reform Now, Source: <http://edreformnow.org/wp-content/uploads/2022/03/Family-Guide-to-Assessments-Final.pdf>



completing the course. Too few students get dual credit opportunities in D.C., and we are an outlier in this regard. By providing dual credit courses, students have more time to devote to other important college and career activities. They are more likely to treat dual credit courses as part of their core academic experience rather than an extra or supplemental enrichment activity. We also encourage OSSE to ensure all schools offer rigorous AP/IB opportunities.

Include Structured Literacy Training for All Educators in Elementary Schools

Because only 30% of students are proficient in reading by fourth grade,⁷ we recommend that **OSSE add a metric for schools that provide educators serving students K-5 with structured literacy training**, which is shown to improve literacy for all students, particularly those with reading difficulties like Dyslexia. This training ensures that the District remains serious about ensuring every student can read on grade level. At the very least, this information should be published on the D.C. School Report Card.

Guiding Principle #3 - Transparency:

Provide Clear Information on School Quality

We believe it's important for OSSE to identify struggling schools and support them. Currently, OSSE is considering removing the summative rating for schools and providing an "accountability calculation." Regardless of whether the District moves away from STARS, we believe **it is essential for parents and families to have a single transparent summative calculation** for determining how well a school serves each student population across all metrics every year. Even more importantly, **OSSE must**

⁷ 2019 National Assessment of Educational Progress



clearly and effectively explain in an easy-to-understand and accessible manner how it arrived at that calculation and why.

Harness the Accountability System to Support Schools

ESSA requires states to set aside 7% of Title I funds for schools identified in need of support, and we do not know what happens with the funding. Further, it is unclear what happens to a school after three years of support. **OSSE should make its action plan explicit so the public is aware and can play an active role in holding schools accountable for student success.**

In closing, we urge you to adopt our key recommendations to incentivize equitable change within our public education. As always, we look forward to continuing to partner with you to ensure that all students have just and equitable opportunities in the District.

Sincerely,

Jessica Giles

State Director, Education Reform Now D.C.

CC:

Rep. Jessica Sutter, President, D.C. State Board of Education

Rep. Eboni-Rose Thompson, Vice President, D.C. State Board of Education

D.C. State Board of Education

Josh Boots
Public Testimony
June 2022 SBOE Meeting on School Accountability

In my 12 years of DC school accountability participation, I served on the development task force for the original PCSB PMF back in 2010, the original SBOE ESSA Task Force in 2015-16, and OSSE STAR business rules technical advisory group in 2017.

It is a rare occasion that I don't have 25 additional questions or suggestions after an education agency presentation on school accountability changes. For example, I voiced my frustration with OSSE and opposed the use of a star rating system in 2017. OSSE's ESSA amendment demonstrates a commitment to DC's values of equitable outcomes and high expectations for our most vulnerable students and the kind of bold leadership DC needs as we transition to endemic status.

The amendment is a positive step forward with these major improvements:

- Dramatic increase to the weight of historically low-performing student groups from 10% to 55% of the total score, better reflecting the populations in DC;
- Increase in the points for student growth by 25%;
- For high schools, adds student growth and five-year graduation rate; and
- Ensures attendance growth is included for all schools.

I conducted a preliminary analysis of the proposed equity and growth changes to estimate how they would impact 2018-19 school scores. The overall score gap between schools serving high (>70%) and low (<30%) percentages of students designated as at-risk would shrink by an estimated 12-18 points with schools in Wards 7 and 8 averaging the largest point gains.

Will this amendment alone get our accountability system where we want it to be? No. There are other important points Board Members have raised around school climate, career readiness, and science/social studies measures that are not yet implemented nor valid and reliable enough for inclusion in a high-stakes accountability system, which is what this amendment must address.

Best practice for creating new measures of success for high-stakes, Big A, accountability is to follow this progression:

1. Design a framework that outlines the purpose and intent
2. Pilot collection tools
3. Beta test the metric to check its validity and reliability
4. Add the metric to little a, accountability, policies such as publicly releasing results on the report card and monitor for unintended consequences
5. Seek a new amendment with ED and include the metric in Big A, Accountability, high-stakes calculations

I support the State Board's push for important future revisions outside of the current accountability amendment, including statewide student, parent, and educator climate and satisfaction survey tools. We cannot hold up the proposed equitable improvements and continue with the status quo system for 2022-23.

My one suggested change to this ESSA amendment is regarding my concern for the outcomes for our lowest performing student group in the city, at-risk students with disabilities. They are a small but important group of students. I hope that the State Board will consider moving 5 points from the All Students group to a new At-Risk

Students with Disabilities group. This would translate OSSE's commitment to improve outcomes for economically disadvantaged students and those with disabilities through its school support work to the accountability system as well.

I want to thank OSSE staff for prioritizing equity in the accountability redesign and the State Board for championing equity and whole child initiatives.

Josh

Additional Topics for Future Accountability Consideration

Growth for elementary schools is only calculated in 4th and 5th grade, and our K-2 students only contribute to a handful of points. I hope to see a task force organized in 2022 that will examine the possibilities for expanding the measurement of student growth and classroom climate to more grades

I'm not sure I fully understand the purpose of redefining the universe of "economically disadvantaged" in high school by removing overage. It will impact the ability to longitudinally track outcomes for some of our most vulnerable high school students over time. I hope OSSE will retroactively calculate and post in a public data file the outcomes of students who meet the new definition for all report card elements since 2017-18.

Received via email

Subject: Public Comment on Proposed Changes to DC's ESSA State Plan for Accountability

From: Anne Herr

To: OSSE.ESSA@dc.gov

CC: Shannon Hodge, Tameria Lewis

Public Comment on OSSE's Proposed Changes to DC's ESSA State Plan for Accountability

The DC Charter School Alliance supports OSSE's proposed changes to DC's ESSA State Plan for Accountability. We appreciate OSSE's thoughtful process for engaging LEAs in meaningful discussions about a new framework. We believe OSSE focused on the correct goals, and we see the resulting framework, with its greater emphasis on growth and its shift in how student populations are compared, as a meaningful step in the direction of equity. While the effect of changes to the framework will not be clear until it is applied to real data, we are eager to assess the impact later in the year. We look forward to continued LEA engagement with OSSE on the Technical Guide and the DC School Report Card, which are also important components of public accountability.

Received via email

Subject: Feedback re: PK and AE

From: Ashley Simpson Baird

To: OSSE.ESSA@dc.gov

CC: Karen Hertzler

Good day,

I am writing with feedback on the proposed changes to DC's ESSA State Plan for Accountability on behalf of Briya PCS. Since Briya serves students in non-compulsory grades (PreK and adult), it is unclear in the proposed changes how they may apply to our school. Specifically, we would like to request that the changes delineate that the metrics for chronic absenteeism and reenrollment will not apply to pre-kindergarten programs that are not part of a PK-8 school nor adult education programs. Previous metrics for chronic absenteeism and re-enrollment have not included PK-only and adult schools.

Thank you. Please let us know if we can provide additional information.

Regards,

Ashley

DC TO EXTEND ACADEMIC RACIAL PROFILING
IN PUBLIC SCHOOLS

Comment on DC's new school accountability plan
(2022 DC ESSA Plan Amendment)

By Jeff Schmidt
Washington, DC
Author of *Disciplined Minds*
jeffschmidt@alumni.uci.edu

6 July 2022

"My goodness, that seems a long way off for our students."

DC school board president Jessica Sutter blurted out those words about the plan for DC public schools to have lower academic achievement goals for black students than for white students until the year 2041.

But Sutter and other school board members are almost certainly going to vote for the plan[1] when it comes to the board for approval. The vote could be as soon as 20 July 2022.

Sutter's impolitic remark, which she made during the school board's 1 June 2022 virtual meeting, likely was provoked by a viewer's comment in the "chat" box.[2] The viewer ridiculed the school accountability plan, noting that the lower academic proficiency goals would apply to black children who haven't even been born yet. A black child born the day the school board approves the plan will be out of high school before the plan requires DC public schools to educate black children as well as white children. Yet they call this a school "accountability" plan.

Sutter's statement was not met by nods of agreement from fellow school board members, but rather by blank looks and silence. She quickly dropped the subject. If history is any guide, the board will approve the 2041 date of equal academic expectations without saying another word about it. Sutter's folly will not be repeated.

Two generations of students will be victims of the unequal academic expectations: the 94,000 children now in DC public schools and, over the next two decades, a comparable number of children, most of whom are yet to be born.

The new plan, with its timetable of essentially never for racial equality in public education, appears designed to benefit DC politicians and education bosses, not children. The low goals will make it as easy as possible for officials to say that DC public schools are meeting their goals. That will help hide their failure to make students proficient in English and math. So will another part of the plan, which will give higher ratings to schools that fail to make their students proficient, as I will describe below.

No school board member can in good conscience vote to approve this plan.

Note that the issue here concerns only public schools. Private schools in DC don't set lower academic achievement goals for their black students than for their white students. They wouldn't do that even if civil rights laws permitted such disparate treatment on the basis of race.

Dodging the law

Known as the "2022 DC ESSA Plan Amendment," the school accountability plan is not only immoral, but also illegal, as both the federal Every Student Succeeds Act and DC law require the plan's proficiency goals to be "ambitious." [3, 4] But DC education officials can count on the fact that no one in DC has the political courage to enforce that law.

By DC law, the school board, officially called the DC State Board of Education, has the power to approve or disapprove the 2041 plan. DC State Superintendent of Education Christina Grant, who was appointed by the mayor, drafted the plan. DC law requires the school board to "Approve the state accountability plan for the District of Columbia," including an "accountability system that establishes ambitious long-term student achievement goals" and "will be

used to hold local education agencies accountable for student achievement." [5]

DC education officials try to distance themselves from their dirty work of approving academic achievement goals that differ greatly by race. They do that mainly by trying never to discuss the huge racial disparity in their goals, as I will detail below.

School board members may also pretend that the racially disparate academic goals, which are in Appendix A of the 97-page proposed plan, are off limits and can't be considered by the board, because the goals have been approved by the federal government. (The superintendent submitted the goals portion of the plan to the federal government on 7 March 2022, but the DC school board has not yet approved any of the plan.) However, the plan's academic achievement goals are not off limits. I asked Superintendent Grant, "Is the school board allowed to consider the contents of Appendix A in deciding whether or not to approve the 97-page 2022 DC ESSA Plan Amendment?" Her reply was clear: "The State Board of Education can consider Appendix A when voting." [6]

The school board has the authority to vote the plan down and ask the superintendent to revise it with meaningful proficiency goals for black students.

After approval by the school board, the plan goes to the federal government for final approval. The federal government would happily approve new, ambitious academic achievement goals for black children in DC.

(The plan sets low goals for Latino students, too, and so in most places here the word "black" could be replaced by "black and Latino.")

Background

The school accountability plan that the board of education approved in 2017 was already one of the least ambitious in the country, [7] as it gave DC schools lower academic

proficiency goals for minority children than for white children until the year 2039.

But now, using the covid pandemic as an excuse, the school board is about to approve a new plan that sets 2041 as the first year of racial equality in academic goals. Thus, instead of committing itself to getting back on track over a period of 5, 10 or even 15 years, and ending the racial difference in academic achievement goals by 2039, DC is again taking the least ambitious path and simply declaring the past two years an unrecoverable loss in terms of academic gain.[8]

This is not to imply that DC's 2039 equality plan was ever acceptable. Saying that schools will start practicing racial equality in academic expectations in 2039 does amount to saying never, and everyone knows that. When DC education officials chose 2039 as their target date, they knew that accountability frameworks don't last that long. The "No Child Left Behind Act" lasted about 14 years before Congress scrapped it and replaced it with the "Every Student Succeeds Act," under which DC's 2039 plan was written.

DC's new unambitious plan only requires schools to teach 31 percent of today's black 7th graders to do math at grade level by the time they are tested in high school three years from now.

However, according to the plan, DC public schools had better pay close attention to their white students, for administrators will be in trouble unless their white students are proficient at almost double that rate (61 percent). The black and white goals for English are 41 percent and 83 percent proficient, respectively.[8]

School board member Ruth Wattenberg in the past claimed that the timetable for ending racial disparity in academic goals doesn't matter. That is false, because each school's annual accountability score depends on how well the school does at keeping up with the timetable,[9] and because school report cards must report progress against the timetable.[10] But if the timetable doesn't matter, then

why write it in a way that insults the intelligence of every black child in the District of Columbia? And why then add insult to that injury by extending its target date for racial equality from 2039 to 2041? Wattenberg, who represents Ward 3 on the board, simply doesn't care enough about these things to vote against approving them.

"Each individual student"

Allowing schools to have lower academic achievement goals for their minority students deprives minority children of their right to be treated and judged as individuals. A school with unequal academic goals tells a black student, in essence, "We don't expect as much from you, because many other black students have performed poorly." How else would you explain the plan's prejudgment to a black child?

What explanation do DC education officials give? The accountability plan, which represents the views of both the DC State Superintendent of Education and the DC State Board of Education (if they approve it), offers plenty of feel-good talk. "We will maintain a relentless belief that each individual student can achieve at high levels," they promise. But they will not hold school administrators accountable for making that happen for black students anytime soon, because, they suggest, the administrators might see racial equality in academic goals before 2041 as "unrealistic." [11]

Thus, the superintendent of education and board of education have decided in advance that tens of thousands of black children who are yet to be born will enter the classroom with a badge of inferiority -- their minority status. No matter how hard a minority child works, her public school will see her as being in a low-expectation group until 2041, and that will undermine her education. Countless education studies and experiments have confirmed the obvious fact that expectation affects outcome.

Alternative to academic racial profiling

If DC's education bosses really wanted to eliminate the racial achievement gap, then they would look for an

alternative to their academic racial profiling, which undermines the necessary administrator incentives, teacher expectations and student morale.

The federal Every Student Succeeds Act does not require schools to have lower academic proficiency goals for minority children than for white children. If DC wants to set different proficiency goals for different students, then it should do so according to each student's current proficiency, which DC measures every year, not automatically according to the student's race. It is arguably reasonable to have a lower end-of-year proficiency expectation for a student who begins the year with extremely low proficiency -- but not simply because the student is black.

DC should shift to adaptive testing to pinpoint each student's proficiency as a grade level, such as "grade 4.6 in math" or "grade 9.2 in English."

DC could then easily come up with an accountability plan that is free of racial prejudice, simply by replacing grouping-by-race with grouping by actual measured proficiency. Each proficiency-level group would have its own year-end proficiency goals, which would be set to require greater growth by lower-proficiency groups. Within each proficiency group, students of all races would have exactly the same academic goals, and so there would not be racial profiling.

Achieving the proficiency-group goals would also raise the scores of racial groups by amounts that could be calculated and reported. Scores of low-performing students and racial groups would increase the most.

DC could set academic goals for minority students in each proficiency group -- the same as the goals for the white students in those groups. It could rate schools on how well they achieved those goals and on how equal were the gains of minority and white students within each proficiency group.

New school ratings will hide failure

Another part of the new plan changes DC's school-rating system. Like the plan's 2041 timetable, its new school-rating system will help hide schools' failure to make students proficient. I will describe it here.

DC schools are highly segregated racially. The Supreme Court said in 1954 that separate education is "inherently unequal." Whether or not that is true in theory, it is true in practice. Separate education is clearly not equal in DC schools or elsewhere in the country, and there is no reason to believe that separate will become equal in the future.

Yet no DC education official is calling out the problem. However, DC's current school-rating system does call out the problem and draw attention to the fact that education in DC is unequal.

The officials' answer is to change the school-rating system -- in a way that will put lipstick on the pig of racial segregation. The new system will give higher ratings to separate, less-than-equal schools, making separate look more equal. This will help to normalize DC's separate-but-equal approach to schools.

The new system rates schools through a calculation scheme that many parents will see as so complicated that it amounts to saying, "just trust us."

A close look at the rating scheme shows how it hides a school's failure to make its students proficient. Only 15 percent of a high school's rating, for example, will come from student academic achievement, while 20 percent will come from the school's graduation rate.[12] So, sadly, a school will be able to boost its rating more by handing out meaningless diplomas than by getting its students up to grade level in English and math.

The rating scheme's lack of emphasis on academic achievement violates federal rules. According to those common-sense rules, academic measures must be given "much

greater weight" than non-academic measures such as rates of chronic absenteeism and re-enrollment.[13] In the DC high-school plan, academic-related measures weigh in at 52.5 percent and non-academic at 47.5 percent.[12] DC education officials cannot with a straight face say that the former is "much greater" than the latter. (But maybe they can, because they miscalculate the latter figure to be 37.5.)

DC education officials are also preparing a "school report card" that will hide failure by putting the school's academic achievement data at the very end of a list of six measures.[14]

DC politicians and education officials all appear to be neo-Plessyists. Their new school-rating system helps them tell black parents that "there's more to a school than just academics" and so stop trying to get your children into one of DC's few integrated schools, where the academic standards are higher. Such bad advice reinforces DC's separate-but-equal model of education, which cannot work.

The new school-rating system, like the 2041 equality timetable, tries to hide the fact that the District of Columbia is not seriously pursuing racial equality in education. Both parts of the plan should be rejected.

Hide academic racial profiling from public scrutiny

George Bush called it the bigotry of low expectations, and DC education officials do not want to be seen as bigots. So it is no surprise that they diligently hide from the public the fact that they are setting lower academic achievement goals for black children than for white children.

This is nothing new for DC education officials. In 2016 and 2017, they spent a year developing in a very public way the school-accountability plan called for by the federal Every Student Succeeds Act. Very public except for one thing: the plan's academic achievement goals, which are arguably the heart of an education plan. They developed their racially unequal proficiency goals in secret, without the knowledge or participation of parents or other

stakeholders. They revealed the goals as late in the process as possible, and only because federal rules required a public comment period of at least 30 days. That was the plan that chose 2039 as DC's year of racial equality in proficiency goals.[15]

They did the same thing in February and March 2022 when they changed the timetable portion of the plan from 2039 to 2041. They made that change through something called the "2022 DC State Plan Accountability Addendum." [16] Here are some of the ways DC education officials tried to hide that lowering of their already low academic expectations for minority children...

1. Thirty days is traditionally taken to be the absolute minimum time for a public comment period, and so it was no surprise when DC education officials told the school board that they would give the public 30 days to comment on their addendum to change the year of racial equality from 2039 to 2041.[17]

However, the officials then set the comment cutoff time less than 30 days after they revealed the plan on 2 February 2022.[17] So no stakeholder had even the minimum 30 days to formulate a response. (2 February 2022 to 2 March 2022 is counted as 28 days, because the first full day was 3 February 2022.)

2. They completely ignored the federal recommendation that they "seek public input through consultation that is broad." [18]

3. They completely ignored the federal recommendation that they seek input from "stakeholders that represent the diversity of the community." [18]

4. They completely ignored the federal recommendation that they conduct "targeted stakeholder outreach." [18]

5. They completely ignored the federal recommendation for "holding focus groups." [18]

6. They completely ignored the federal recommendation for "prominently listing the proposed amendments on the SEA's website." [18] The proposed plan was not mentioned at all on the home page of the DC Office of the State Superintendent of Education, the state education agency. To see the plan, you had to already know that it existed, as you had to click on something and then on something else and then on another thing, most of which were not at all obvious choices.

7. In the end, they had not "provided the public a reasonable opportunity to comment" on their plan, mainly because they made sure that almost no one even knew about the odious plan. [18]

8. They chose not to bring the addendum to the school board for public debate and school board endorsement.

They allotted only three working days to revise the addendum in light of public comment, thereby indicating that they had no intention of making substantial changes.

The amendment that is coming up for a school board vote as soon as 20 July 2022 includes the addendum that sets 2041 as the date of racial equality in DC public schools. They gave various organizations and advisory committees the opportunity to give input into developing the plan, but they did not notify the general public. For example, neither the superintendent nor the school board show the amendment "prominently" at their websites. Neither home page even mentions it.

DC Superintendent of Education Christina Grant activated her creativity to try to save school board members the embarrassment of having to endorse publicly the 2041 date for racial equality in academic goals. Grant announced that only "The final accountability components of the plan will be presented to the State Board of Education." [19] Then she conveniently determined that the race-based academic goals were a "non-accountability" component of the plan. [20] When I told her that was Orwellian, because the goals are what the schools are held accountable for, she

dropped the maneuver and said the school board would vote on the entire plan, including the 2041 date.[6]

DC education officials should seriously consider the comments here, but only a fool would think that they will. Their consideration of public input has long been only pro forma. I am submitting this comment to them only as a way of publishing it for you, the public reader. DC's education bosses are service intellectuals, people who maintain the status quo in exchange for the status of being officials. They are critical thinkers but not independent thinkers. That is, they are able to recognize immediately that comments like this have to be ignored, but they are not able to change the status quo in DC schools. The ball is in our court.

-- Jeff Schmidt

References

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<https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/DC%20ESSA%20Plan%20-%202022%20Amendment%20%28CLEAN%20VERSION%29.pdf>
2. <https://www.youtube.com/watch?v=ZtGkR-X5GiQ>
Chat comments by Jeff Schmidt at 0:33:37 and 1:44:53.
Remark by Jessica Sutter at 1:55:43.
3. ESSA (2015): "Establish ambitious State-designed long-term goals"
4. DC Code, section 38-2652 (a) (7) (A)
5. DC Code, section 38-2652 (a) (7), (7) (A) and (7) (B)
6. E-mail from Schmidt to Grant, 21 June 2022, and Grant to Schmidt, 24 June 2022. Available from Schmidt upon request or from Grant via FOIA request.
7. <https://www.edweek.org/policy-politics/approved-essa-plans-explainer-and-key-takeaways-from-each-state>

8. See the plan's high-school math and English goals, appended below.

9. Proposed 2022 DC ESSA Plan Amendment, page 24, discussion of "performance target"

10. Page 7, third bullet point

<https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/ESSA%20Accountability%20Revisions%20-%20Parent%20Meeting%20Deck%20%28April%202022%29.pdf>

11. Proposed 2022 DC ESSA Plan Amendment, first page of Appendix A

12. Proposed 2022 DC ESSA Plan Amendment, pages 26-27

13. Proposed 2022 DC ESSA Plan Amendment, page 25

14. The six measures are items A through F in recommendation 4 in DC SBOE resolution SR22-1

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15.

<https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/OSSE%20ESSA%20State%20Plan%20August%2028%20Clean.pdf>

16.

<https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/2022%20DC%20State%20Plan%20Accountability%20Addendum%200.pdf>

and

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17. OSSE presentation to SBOE, 2 February 2022, page 15

<https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=9000&AID=253653&MID=9308>

18. 2022 DC State Plan Accountability Addendum, page 3.

[https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/2022%20DC%20State%20Plan%20Accountability%20Addendum 0.pdf](https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/2022%20DC%20State%20Plan%20Accountability%20Addendum%200.pdf)

19. <https://osse.dc.gov/essa>

20. ESSA amendment overview, page 18

[https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/ESSA%20Amendment%20-%20Accountability%20System%20revisions%20overview%20-%20Stakeholder%20deck FINAL.pdf](https://osse.dc.gov/sites/default/files/dc/sites/osse/page/content/attachments/ESSA%20Amendment%20-%20Accountability%20System%20revisions%20overview%20-%20Stakeholder%20deck%20FINAL.pdf)

Statewide Assessments High School, Percentage of students scoring at “Meet or Exceed expectations for the grade level or course”, Math

	All Students	Economically disadvantaged Students (At-Risk)	Students with Disabilities	English Learners	Black or African-American	Hispanic, of any race	White	Asian	American Indian, Alaskan Native	Native Hawaiian, other Pacific Islander	Two or more races
Yearly Percentage increase	3.2%	3.4%	3.5%	3.4%	3.4%	3.2%	1.5%	1.6%	3.2%	3.2%	2.0%
2014-15	8.8%	4.1%	0.7%	3.8%	4.6%	8.1%	49.1%	46.8%	8.8%	8.8%	36.0%
2015-16	12.0%	7.5%	4.2%	7.2%	8.0%	11.3%	50.6%	48.4%	12.0%	12.0%	38.0%
2016-17	15.2%	10.8%	7.7%	10.6%	11.3%	14.5%	52.1%	50.0%	15.2%	15.2%	40.1%
2017-18	18.3%	14.2%	11.2%	14.0%	14.7%	17.7%	53.6%	51.6%	18.3%	18.3%	42.1%
2018-19	21.5%	17.6%	14.8%	17.3%	18.0%	20.9%	55.1%	53.2%	21.5%	21.5%	44.2%
2019-20											
2020-21											
2021-22	24.7%	21.0%	18.3%	20.7%	21.4%	24.1%	56.6%	54.8%	24.7%	24.7%	46.2%
2022-23	27.9%	24.3%	21.8%	24.1%	24.7%	27.3%	58.1%	56.4%	27.9%	27.9%	48.3%
2023-24	31.0%	27.7%	25.3%	27.5%	28.1%	30.5%	59.6%	57.9%	31.0%	31.0%	50.3%
2024-25	34.2%	31.1%	28.8%	30.9%	31.4%	33.7%	61.1%	59.5%	34.2%	34.2%	52.3%
2025-26	37.4%	34.4%	32.3%	34.3%	34.8%	36.9%	62.6%	61.1%	37.4%	37.4%	54.4%
2026-27	40.6%	37.8%	35.8%	37.6%	38.1%	40.1%	64.1%	62.7%	40.6%	40.6%	56.4%
2027-28	43.7%	41.2%	39.3%	41.0%	41.5%	43.3%	65.6%	64.3%	43.7%	43.7%	58.5%
2028-29	46.9%	44.6%	42.9%	44.4%	44.8%	46.6%	67.1%	65.9%	46.9%	46.9%	60.5%
2029-30	50.1%	47.9%	46.4%	47.8%	48.2%	49.8%	68.5%	67.5%	50.1%	50.1%	62.5%
2030-31	53.3%	51.3%	49.9%	51.2%	51.5%	53.0%	70.0%	69.1%	53.3%	53.3%	64.6%
2031-32	56.4%	54.7%	53.4%	54.6%	54.9%	56.2%	71.5%	70.7%	56.4%	56.4%	66.6%
2032-33	59.6%	58.0%	56.9%	57.9%	58.2%	59.4%	73.0%	72.3%	59.6%	59.6%	68.7%
2033-34	62.8%	61.4%	60.4%	61.3%	61.6%	62.6%	74.5%	73.9%	62.8%	62.8%	70.7%
3034-35	66.0%	64.8%	63.9%	64.7%	64.9%	65.8%	76.0%	75.5%	66.0%	66.0%	72.7%
2035-36	69.1%	68.1%	67.4%	68.1%	68.3%	69.0%	77.5%	77.0%	69.1%	69.1%	74.8%
2036-37	72.3%	71.5%	71.0%	71.5%	71.6%	72.2%	79.0%	78.6%	72.3%	72.3%	76.8%
2037-38	75.5%	74.9%	74.5%	74.9%	75.0%	75.4%	80.5%	80.2%	75.5%	75.5%	78.9%
2038-39	78.7%	78.3%	78.0%	78.2%	78.3%	78.6%	82.0%	81.8%	78.7%	78.7%	80.9%
2039-40	81.8%	81.6%	81.5%	81.6%	81.7%	81.8%	83.5%	83.4%	81.8%	81.8%	83.0%
2040-41	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%

**Statewide Assessments High School, Percentage of students scoring at “Meet or Exceed expectations for the grade level or course”,
English Language Arts**

	All Students	Economically disadvantaged Students (At-Risk)	Students with Disabilities	English Learners	Black or African-American	Hispanic, of any race	White	Asian	American Indian, Alaskan Native	Native Hawaiian, other Pacific Islander	Two or more races
Yearly Percentage increase	2.5%	2.9%	3.4%	3.4%	2.7%	2.5%	0.1%	1.5%	2.5%	2.5%	0.1%
2014-15	25.0%	16.5%	3.7%	4.6%	19.6%	25.5%	81.6%	47.9%	25.0%	25.0%	83.4%
2015-16	27.5%	19.4%	7.1%	8.0%	22.3%	28.0%	81.7%	49.4%	27.5%	27.5%	83.5%
2016-17	30.0%	22.2%	10.5%	11.3%	25.1%	30.5%	81.9%	51.0%	30.0%	30.0%	83.5%
2017-18	32.5%	25.1%	13.9%	14.7%	27.8%	32.9%	82.0%	52.5%	32.5%	32.5%	83.6%
2018-19	35.0%	27.9%	17.3%	18.0%	30.5%	35.4%	82.2%	54.1%	35.0%	35.0%	83.7%
2019-20											
2020-21											
2021-22	37.5%	30.8%	20.6%	21.4%	33.2%	37.9%	82.3%	55.6%	37.5%	37.5%	83.7%
2022-23	40.0%	33.6%	24.0%	24.7%	36.0%	40.4%	82.5%	57.2%	40.0%	40.0%	83.8%
2023-24	42.5%	36.5%	27.4%	28.1%	38.7%	42.9%	82.6%	58.7%	42.5%	42.5%	83.9%
2024-25	45.0%	39.3%	30.8%	31.4%	41.4%	45.3%	82.7%	60.3%	45.0%	45.0%	83.9%
2025-26	47.5%	42.2%	34.2%	34.8%	44.1%	47.8%	82.9%	61.8%	47.5%	47.5%	84.0%
2026-27	50.0%	45.0%	37.6%	38.1%	46.9%	50.3%	83.0%	63.4%	50.0%	50.0%	84.1%
2027-28	52.5%	47.9%	41.0%	41.5%	49.6%	52.8%	83.2%	64.9%	52.5%	52.5%	84.1%
2028-29	55.0%	50.8%	44.4%	44.8%	52.3%	55.3%	83.3%	66.5%	55.0%	55.0%	84.2%
2029-30	57.5%	53.6%	47.7%	48.2%	55.0%	57.7%	83.4%	68.0%	57.5%	57.5%	84.3%
2030-31	60.0%	56.5%	51.1%	51.5%	57.8%	60.2%	83.6%	69.5%	60.0%	60.0%	84.3%
2031-32	62.5%	59.3%	54.5%	54.9%	60.5%	62.7%	83.7%	71.1%	62.5%	62.5%	84.4%
2032-33	65.0%	62.2%	57.9%	58.2%	63.2%	65.2%	83.9%	72.6%	65.0%	65.0%	84.5%
2033-34	67.5%	65.0%	61.3%	61.6%	65.9%	67.6%	84.0%	74.2%	67.5%	67.5%	84.5%
3034-35	70.0%	67.9%	64.7%	64.9%	68.7%	70.1%	84.1%	75.7%	70.0%	70.0%	84.6%
2035-36	72.5%	70.7%	68.1%	68.3%	71.4%	72.6%	84.3%	77.3%	72.5%	72.5%	84.7%
2036-37	75.0%	73.6%	71.5%	71.6%	74.1%	75.1%	84.4%	78.8%	75.0%	75.0%	84.7%
2037-38	77.5%	76.4%	74.8%	75.0%	76.8%	77.6%	84.6%	80.4%	77.5%	77.5%	84.8%
2038-39	80.0%	79.3%	78.2%	78.3%	79.6%	80.0%	84.7%	81.9%	80.0%	80.0%	84.9%
2039-40	82.5%	82.1%	81.6%	81.7%	82.3%	82.5%	84.9%	83.5%	82.5%	82.5%	84.9%
2040-41	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%

Received via email

Subject: Public comment on ESSA...

From: Ruth Wattenberg

To: OSSE.ESSA@dc.gov

CC: Emily Gasoi, Carlene Reid

Dear Superintendent Grant,

We are taking this opportunity to offer public comment on the Office of the State Superintendent of Education's (OSSE) 2022 Every Student Succeeds Act (ESSA) State Plan Amendment. We hope you can accept it though it is coming 50 minutes after the deadline.

As you know from other meetings, We are supportive of a number of the proposed changes and appreciate the work undertaken to offer this Amendment. We also stand with our SBOE colleagues in the comments formally submitted by the SBOE.

In addition, though, we must convey our dissatisfaction with OSSE's plan to publish a summative score for every school (Annual Meaningful Differentiation, Page 28) and for declining to commit that this score will only be published/reported in a way that clearly labels it is a measure of school need and not a fair, valid indicator of school quality.

As you know, in many states, per federal rules, states report whether schools are identified for special assistance via the "meaningful difference score, but they do not report the individual score of each school. It is important to report on school quality indicators, which the Board proposes to do through a dashboard. But reporting the specific score, when it is an aggregate of many different indicators, can easily be misunderstood.

The State Board unanimously voted for a resolution that calls for removing a single, summative rating from the D.C. School Report Card. In a separate vote, just on the amendment that called for removing the single summative rating, Board members voted 7-2 in favor of the amendment. That resolution explained that "a single summative score is based on a set of indicators that may or may not be most valued by stakeholders or most useful in highlighting areas in need of support, and therefore creates a less accurate, less transparent, and less useful assessment of school quality than a dashboard with each indicator visible." Board members further argued that low ratings were "disproportionately awarded" to schools with many students designated-at-risk because "several indicators, including reenrollment rates and proficiency rates" were "highly correlated to family income rather than school quality." As these indicators and others that are highly correlated with family income will continue to be used, per this amendment and as required by federal law, in the determination of the meaningful difference score, the single score can again be misleading.

We strongly urge that any single, summative score not be displayed prominently on the D.C. School Report Card's landing page or elsewhere. Wherever it is reported, it should be made clear that the score is not a measure of school quality but a measure of school need based on a federally-required calculation.

Thank you for considering this comment as you make your final revisions.

Emily Gasoi, Ward 1 Member,
DC State Board of Education

Ruth Wattenberg, Ward 3 member,
DC State Board of Education

Carlene Reid, Ward 8 member,
DC State Board of Education