



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](#).<sup>1</sup>

- ***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

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<sup>1</sup> 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 members<sup>2</sup> 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.

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<sup>2</sup> 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

