



**District of Columbia State Board of Education
DCSBOE**



Hosanna Mahaley Jones, State Superintendent of Education
Office of the State Superintendent of Education
810 1st Street NE, 9th Floor
Washington, DC 20002

January 29, 2013

Dear State Superintendent Mahaley Jones:

On behalf of the State Board of Education, we are looking forward to another year of working closely with your office. Our hope is that we can continue to work collaboratively to improve the achievement of students in the District of Columbia.

On January 14, 2013, Mr. Alvarez shared with the State Board a number of items that the Office of the State Superintendent of Education wanted to see at our working session on February 6 and our public meeting on February 20. In advance of taking any action, the State Board would like to request information so that we can be prepared for these meetings. The items were:

- Revisions to Compulsory Attendance Rulemaking
- National Educational Technology Standards
- Revised Annual Report Cards
- Revised Early Learning Standards

To ensure a fruitful conversation on February 6, we are requesting the following information:

I. Revisions to Compulsory Attendance Rulemaking

The status of the rulemaking;

RESPONSE:

The proposed rules were posted in the DC Register on January 4, 2013. The 30-day public comment period ends on February 4, 2013. When the public comment period closes, OSSE will review the comments and determine whether substantive changes need to be made and revised rules proposed, or whether substantive changes are not needed, and OSSE can proceed to finalize the rules through SBOE approval and publication of final rules.

A summary of public feedback received;

RESPONSE:

The public comment period closes on February 4, 2013; thus, there is no summary of the public comments at this time. Comments will be provided to the SBOE once they are gathered.

A list of stakeholders engaged in the rulemaking process;

RESPONSE:

OSSE presented the proposed rules to the DME's Truancy Task Force and received pre-publication comments from DCPS, Public Charter School Board, Metropolitan Police Department, Department of Human Services, Child and Family Services Agency, and Children's Law Center. OSSE then vetted the proposed rules and obtained the approval of the Deputy Mayor for Education, the Council's Office of Policy and Legislative Affairs, the Legal Counsel Division of the Office of the Attorney General, and the Office of Documents and Administrative Issuances.

A report on the rollout, training, implementation and monitoring plans relevant to this rulemaking, and

RESPONSE:

OSSE convenes a monthly internal working group that monitors implementation of the South Capitol Street Memorial Amendment Act of 2012.

The project management and implementation plan created by the Elementary and Secondary Division of OSSE reflects the following key strategic initiatives and milestones:

- 1) Development of guide for parents and legal guardians on the District's laws and regulations related to absenteeism and truancy. (Required Completion Date: 10/1/13)

The resource guide will be drafted with the assistance of the Regional Educational Laboratory Program (REL). REL works in partnerships with school districts, state departments of education, and others to use data and research to improve academic outcomes for students. Most recently, the REL has worked with Maryland to develop their drop-out prevention guide.

- 2) Finalization of the compulsory attendance rulemaking (Expected Completion Date: Based on State Board Input). On December 19, OSSE presented the following highlights to the State Board of Education for discussion:
 - Standardizing how truancy and absenteeism will be tracked and calculated across the District Schools (or LEAs) shall adopt an absenteeism protocol:
 - a. Continuum of interventions (which does not include expulsion & suspension as remedies for truancy),
 - b. Process for educating staff, parents & students on truancy prevention,
 - c. Process for notifying parents of absences; and
 - d. Referral to school-based student support team within 2 days after 5th unexcused absence in a marking period (or 10th unexcused absence in school year)
 - Monitoring whether each school designates an attendance monitor and implements a school-based student support team as an early absenteeism intervention.
 - a. Members should be trained in compulsory attendance laws & truancy intervention strategies/best practices
 - i. Functions of student support team:
 1. Determine underlying cause of truancy,
 2. Reasonable & diligent efforts to collaborate with student & parents,
 3. Communicate with IEP team,
 4. Develop action plan in consultation with student & parents; and
 5. Use school & community resources to abate truancy.

ii. Makeup of team:

1. Attendance monitor
2. General education teacher
3. School nurse, psychologist, social worker
4. IDEA coordinator
5. Early learning teacher
6. Bilingual teacher
7. Representatives of CFSA and/or DYRS
8. Homeless liaison
9. Guardian *ad litem*

- Utilizing attendance data to analyze and report on how effectively schools are addressing truancy; and
- Revising and implementing approval of private school programs colleagues.

3) Inclusion/publication of truancy data on state report card (Expected Completion Date: 8/2013)

To comply with this requirement, OSSE's implementation strategy will include:

- Accurate, daily, contemporaneous attendance record beginning on first day of school & ending on last day of school unless student officially enrolls in another school,
- Attendance may not be recorded by volunteers or other students,
- Record of when truant student returned to school by truancy officers or MPD,
- Maintenance of attendance records for 5 years,
- Certification of school year's attendance records by chief school officer within 30 days after end of school year; No further amendments but for good cause shown; and
- Aggregate attendance report due within 60 days after end of school year.

4) Implementation of private school oversight plan (Expected Completion Date: 5/2013)

- Beginning with the 2014-15 school year, attendance at a private school will only fulfill the requirements of compulsory attendance if the private school's elementary and secondary program has been reviewed and approved by OSSE; and
- Ongoing approval is contingent upon compliance with attendance record collection & reporting requirements.

5) Creation of technical assistance and support to aid LEA compliance (Ongoing)

- During school year, OSSE will periodically review submitted attendance records to ensure that students receive required referrals for truancy intervention
- Schools must submit corrective action plans to address identified discrepancies between submitted records & requirements of the rules
- Annual report card:
 - a) Truancy rate for each school,
 - b) Progress in improving attendance & reducing truancy from the prior school year; and
 - c) School's compliance with key attendance & truancy requirements.

Information regarding the readiness of schools to implement the “continuum of school practices and services including meaningful supports, incentives, intervention strategies, and consequences for dealing with absenteeism...”

RESPONSE:

At this time, OSSE does not have information regarding the continuum of school practices. The Council conducted the research about capacity in the drafting process and determined that schools shall implement school-based student support teams and that those teams are responsible for “developing and implementing action plans and strategies that are school-based or community-based, depending on availability, to enhance the student’s success with services, incentives, intervention strategies, and consequences for dealing with absenteeism.” The language in the rulemaking was pulled from the statute, which is current law. Schools already have to do this based on the statute, so their readiness to implement is not at issue for the rulemaking, which merely fleshes out the existing requirements and provides guidance and enforcement.

II. National Educational Technology Standards

Since the State Board’s approval of the NETS is anticipated to “spark” a conversation on the issue of technology in schools, what mechanisms are in place to engage LEAs and/or the public in this discussion?

RESPONSE:

We can post the standards for public comment and/or schedule a series of face-to-face meetings asking for public comment.

Are any LEAs currently using the NETS?

RESPONSE:

Yes. DCPS uses them but does not provide PD. Some charter schools use them as guidelines but have not officially adopted.

If the Board approves the NETS, what are the next steps in the implementation of the standards? When would full implementation be expected?

RESPONSE:

OSSE can offer a series of trainings integrating the NETS with the CCSS. If funding permits we can also offer a series of tech trainings such as the use of SMART Boards and NETS. Adopting NETS will confirm our commitment to 21st century learning.

III. Revised Annual Report Cards

A copy of the proposed report card with the changes and rationale for each change

RESPONSE:

Data on the revised report cards are forthcoming.

IV. Revised Early Learning Standards

Please see additional letter for questions related to the revised Early Learning Standards.

RESPONSE:

See the ECE Letter.

I am requesting this information be submitted by close of business on **Friday, February 1, 2013**. Please contact me or have your staff contact, Jesse B Rauch, Executive Director, at 202.741.0884 or

jesse.rauch@dc.gov should you have any questions.

Thank you.

Sincerely,

Laura Slover, President
State Board of Education

cc: Jose Alvarez
Ayan Islam
Mark Jones, Vice President, State Board of Education