



District of Columbia
Office of the State Superintendent of Education

OSSE'S REPORT ON THE UNIFORM PER STUDENT FUNDING FORMULA

2025

June 2025

Table of Contents

Introduction.....	1
Description of the 2024-25 UPSFF Working Group.....	2
UPSFF Overview.....	3
Working Group Focus: 2023 School Funding Study Special Education Weight Adjustment Recommendation.....	5
Current Special Education Landscape	6
Considerations for the Funding Study Recommendation	10
Working Group Recommendations.....	12
Estimated Costs and Potential Budget Implications	14
Acknowledgement.....	16
Appendix A: Working Group Members	17
Appendix B: School Year 2024-2025 UPSFF Funding Amounts	18
Appendix C: Public Comment	21

Introduction

Section 112(a)(2) of the Uniform Per Student Funding Formula for Public Schools and Public Charter Schools Act of 1998 requires the Mayor to submit to the Council a report every two years that reviews the Uniform Per Student Funding Formula (“UPSFF”) and includes recommendations for revisions to the UPSFF based upon a study of actual costs of education in the District, research in education and education finance, and public comment.¹

OSSE convened a UPSFF Working Group (“Working Group”) with representatives of DC Public Schools (“DCPS”), DC public charter schools, the DC Public Charter School Board, government representatives, education stakeholders, and the public to solicit input and generate recommendations regarding revisions to the formula. The Working Group met monthly from September 2024 through January 2025 and focused on the *2023 School Funding Study* recommendation to add a supplemental weight for the highest need students with disabilities in the regular, residential, and extended school year categories.²

¹ Section 112(a) of the Uniform Per Student Funding Formula for Public Schools and Public Charter Schools Act of 1998, effective March 26, 1999 (D.C. Law 12-207; D.C. Official Code § 38-2911(a)(2)).

² Afton Partners, Augenblick, Palaich & Associates, and Metropolitan Strategies and Solutions, *2023 School Funding Study Final Report*, OFF. OF THE DEPUTY MAYOR FOR EDUC. (Dec. 2023), <https://dme.dc.gov/fundingstudy> (last visited Apr. 3, 2024).

Description of the 2024-25 UPSFF Working Group

Staff members from OSSE and the Office of the Deputy Mayor for Education (“DME”) jointly facilitated the Working Group meetings. Members of the Working Group included representatives from DCPS, DC public charter schools, government representatives, education stakeholders, and members of the public. Collectively leaning on their wide range of professional expertise, Working Group members provided an array of perspectives on the group’s discussions and provided critical input on a proposal to revise the UPSFF formula. Working Group members are listed in Appendix A.

All meetings for the Working Group were public, and members of the public were invited to provide comment at each meeting. The meetings took place virtually on the following dates and times:

- Wednesday, September 11, 2024, 3:00-5:00 p.m.
- Wednesday, October 2, 2024, 3:00-5:00 p.m.
- Wednesday, October 30, 2024, 3:00-5:00 p.m.
- Wednesday, November 13, 2024, 3:00-5:00 p.m.
- Wednesday December 18, 2024, 3:00-5:00 p.m.
- Wednesday January 15, 2025, 3:00-5:00 p.m.

The Working Group’s area of focus was on how the District should proceed with the *2023 School Funding Study* recommendation to add an increased special education weight for students with disabilities with the highest needs. Membership, meeting notices, and meeting recordings are available on the Working Group section of OSSE’s website.³ Additionally, the DME published notice of the meetings in the *District of Columbia Register*.⁴

³ *2024-25 Uniform Per Student Funding Formula (UPSFF) Working Group*, OFF. OF THE STATE SUPERINTENDENT OF EDUC., <https://osse.dc.gov/page/2024-25-uniform-student-funding-formula-upsff-working-group> (last visited Apr. 7, 2025).

⁴ For example: Notice ID: N139279, *Notice of Public Meeting - 2024-25 Uniform Per Student Funding Formula (UPSFF) Working Group Session 4 - January 15, 2025*, <https://dcregs.dc.gov/Common/NoticeDetail.aspx?NoticeId=N139279> (last visited January 3, 2025).

UPSFF Overview

The District’s UPSFF was first implemented in the 1999-2000 school year, following the passage of the Uniform Per Student Funding Formula for Public Schools and Public Charter Schools Act of 1998, and is the mechanism to provide local funding to all local educational agencies (“LEA”).⁵ The funding formula is based on enrollment and sets forth a minimum foundational level required to adequately fund education. For the 2024-25 school year, which primarily comprises the DC FY25, the foundation level is \$14,668. The UPSFF currently allocates local funds only. However, previous formula deliberations have considered federal funding and other revenues that support public education in Washington, DC.

Funding amounts are determined using the foundation level and the funding weights. Weights are used to account for differences in the cost of educating various student groups, and they are calculated by applying a multiplication factor to the foundation level based on a particular student characteristic. These student characteristics include grade level, special education enrollment, and program enrollment.

Funding weights are divided into two categories: general education weights and supplemental weights. Each student enrolled in a local educational agency (LEA) is designated with one, and only one, general education weight that aligns to their grade-level or school program. The general education weights are listed below:

- Pre-Kindergarten 3
- Pre-Kindergarten 4
- Kindergarten
- Grades 1-5
- Grades 6-8
- Grades 9-12
- Alternative Program
- Special Education School
- Adult Education

In addition to receiving a general education weight, a student may also be designated as eligible for one or more supplemental weights. An LEA will receive funding for each of the supplemental weights applicable to an individual student.

The supplemental weights fall under the four categories listed below:

- English Language Learners⁶
- At-Risk⁷
- Special Education⁸
- Residential⁹

⁵ D.C. Official Code §§ 38-2901–38-2914.

⁶ There are different weights for elementary and secondary students.

⁷ Per D.C. Official Code § 38-2901, ‘at risk’ means a DCPS or public charter school student who is identified as one or more of the following: homeless; in the District’s foster care system; qualifies for Temporary Assistance for Needy Families program or the Supplemental Nutrition Assistance Program; or a high school student that is one year older, or more, than the expected age for the grade in which the student is enrolled.” There are different weights for over-age students, for schools where the percentage of at-risk students is above 40 percent, and for schools where the percentage of at-risk students is above 70 percent.

⁸ More details are provided below.

⁹ There are additional weights for students with disabilities in residential schools.

To calculate the funding amount that an LEA will receive for a student, the foundation level is multiplied by the funding weights associated with each student. For example, for a tenth-grade student in FY25, the LEA in which they are enrolled will receive $\$14,668 \times 1.22$, which equals $\$17,895$. If that student is also designated as an at-risk student, the at-risk weight, 0.30, is applied to the foundation level of $\$14,668$, and the LEA will receive an additional $\$4,400$ resulting in a total of $\$22,295$ for that student ($\$17,895 + \$4,400 = \$22,295$). See Appendix B for a full list of the general education and supplemental weights, along with funding amounts for the 2024-25 school year.

In addition to the general and supplemental education weights that are applied to the foundation funding level for student characteristics, the formula provides funding to public charter schools to cover the costs of facilities. For the 2024-25 school year, the facilities allotment rate is $\$3,734$ for non-residential facilities and $\$10,083$ for residential facilities.

Over time, the UPSFF has been periodically revised by adjusting the foundation level or having funding categories added and removed. The UPSFF foundation level is determined each fiscal year through the annual budget formulation process, where a variety of factors are considered such as public and public charter school enrollment projections, LEA needs, and an analysis of the city's revenue estimates. This process has resulted in the foundation level increasing over time.

Adjustments made to the UPSFF in the FY24 budget included:

- A 5.05 percent increase to the foundation level from $\$12,419$ to $\$13,046$;
- An increase in the facilities allowance for public charter schools from $\$3,513$ to $\$3,622$ for non-residential facilities and from $\$9,486$ to $\$9,780$ for residential facilities; and
- An increase in the at-risk concentration > 40% and at-risk concentration > 70% amounts from 0.05 to 0.07.

Adjustments made to the UPSFF in the FY25 budget included:

- A 12.43 percent increase to the foundation level from $\$13,046$ to $\$14,668$;
- An increase in the facilities allowance for public charter schools from $\$3,622$ to $\$3,734$ for non-residential facilities and from $\$9,780$ to $\$10,083$ for residential facilities;
- An increase to the alternative weight from 1.52 to 1.58;
- An increase to the adult weight from 0.91 to 1.00; and
- An increase to the at-risk weight from 0.24 to 0.3.

Working Group Focus: 2023 School Funding Study Special Education Weight Adjustment Recommendation

The DME's *2023 School Funding Study* sought to reexamine funding adequacy for students in the District of Columbia using holistic and non-traditional funding study methods such as the triangulation of national research, an exploration of local funding trends, and the utilization of diverse community stakeholder data. Using this mixed methodology, the study explored school spending, identified funding gaps, and explored best practices for allocating UPSFF and non-UPSFF dollars to accelerate learning and provide systems of support to meet the unique needs of the District's schools and students. The study also provided a range of recommendations, including the development of innovative instructional programs and improvements to financial reporting.¹⁰

The 2024-25 Working Group examined the 2023 School Funding Study recommendation to address existing needs in the current special education funding landscape. Working Group members were tasked with exploring the technical processes for how the District could best implement this recommendation.

The funding study recommended:

Adjust the UPSFF to better meet student needs by adding a weight for highest need students with disabilities in both regular and extended school year categories.¹¹

¹⁰ Afton Partners, Augenblick, Palaich & Associates, and Metropolitan Strategies and Solutions, *2023 School Funding Study Final Report*, OFF. OF THE DEPUTY MAYOR FOR EDUC. (Dec. 2023), <https://dme.dc.gov/fundingstudy> (last visited Apr. 3, 2024).

¹¹ *Id.*

Current Special Education Landscape

The Working Group reviewed existing facts about the special education weight and the special education landscape. Currently, “special education” is defined in the D.C. Code as:

- Specialized services for students identified as having disabilities, as provided in section 101(a)(1) of the Individuals with Disabilities Education Act, approved April 13, 1970 (84 Stat. 175; 20 U.S.C. § 1401(a)(1)), or students who are individuals with a disability as provided in section 7(8) of the Rehabilitation Act of 1973, approved September 26, 1973 (87 Stat. 359; 29 U.S.C. § 706(8)).¹²

The current, special education levels are defined in D.C. Code as:

- **Level 1:** Eight hours or less per school week of specialized services
- **Level 2:** More than 8 hours and less than or equal to 16 hours per school week of specialized services
- **Level 3:** More than 16 hours and less than or equal to 24 hours per school week of specialized services
- **Level 4:** More than 24 hours per school week of specialized services which may include instruction in a self-contained (dedicated) special education school other than residential placement.¹³

Special education schools are defined in D.C. Code as “a separate DCPS or public charter day school or residential school dedicated exclusively to serving special education students at levels 4 or 5” (though Level 5 is undefined).¹⁴ All students enrolled in a special education school receive a standardized special education school weight across all grade levels (the weight in FY25 is 1.17, equaling \$17,162).¹⁵

Students with disabilities who enroll in non-special education schools receive a general education weight based on either their grade level, alternative program enrollment, or adult education status. Additionally, regardless of the type of school they attend, these students can receive supplemental education weights, which provide funding to accommodate the needs indicated in their Individualized Education Program (“IEP”). This is an effort to address the diverse needs of students receiving special education services in the District.

Within the supplemental category, there are four subcategories of special education funding.

- Special Education – Students identified as having disabilities, as provided in section 101(a)(1) of the Individuals with Disabilities Education Act.¹⁶
- Residential – A District of Columbia Public Schools school or public charter school that provides students with room and board in a residential setting, in addition to their instructional program.¹⁷

¹² D.C. Official Code § 38-2901(11).

¹³ D.C. Official Code § 38-2905(c).

¹⁴ D.C. Official Code § 38-2901(11D).

¹⁵ D.C. Official Code § 38-2904.

¹⁶ D.C. Official Code § 38-2901(11).

¹⁷ D.C. Official Code § 38-2901(10).

- Extended School Year (“ESY”) – Related services that are provided to a child with a disability beyond normal school year of the public agency, in accordance with the child’s IEP, and at no cost to the parents of the child.¹⁸
- Compliance funds provided to public schools through the UPSFF to support activities required to address identified noncompliance with federal and local laws and regulations regarding the provision of special education services to students with disabilities.¹⁹ This subcategory includes a Special Education Compliance supplement and an Attorney’s Fee supplement on a per-student basis.²⁰

Except for compliance funds, all special education supplemental weight categories listed above include funding levels (1-4) that correspond to the amount of time a student spends in specialized instruction per week. After the appropriate special education weight is applied, each LEA also receives supplemental funding for both special education compliance and attorney’s fees for each eligible student.

According to the 2023-24 school year enrollment audit, the District’s enrollment among students with disabilities across all special education levels was nearly 16,000, including the District’s two special education schools, St. Coletta Special Education PCS and River Terrace (DCPS).²¹ This means, among all LEAs in the District, approximately 16 percent of students were eligible for special education services. This highlights the importance of maintaining adequate funding across educational settings.

See Tables 1-3 below for the distribution of special education levels among students funded through the UPSFF in the District for the 2023-24 school year.²²

Table 1. Overall District Special Education Enrollment for SY 2023-24

Special Education Level	Number of Students Enrolled
1	7,193
2	3,739
3	1,874
4	2,945
Total	15,751

¹⁸ Extended School Year Services (ESY) are special education and related services that are provided to a child with a disability beyond the normal school year of the public agency, in accordance with the child’s IEP, and at no cost to the parents of the child (see 34 CFR § 300.106).

¹⁹ D.C. Official Code § 38–2901(11B).

²⁰ D.C. Official Code § 38–2905(c).

²¹ See *Audit and Verification of Student Enrollment for the 2023-24 School Year Report*, OFF. OF THE STATE SUPERINTENDENT OF EDUC. (Apr. 2024), https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/SY23-24%20Enrollment%20Audit%20Report.pdf.

²² *2023-24 School Year Enrollment Audit Report and Data*, OFF. OF THE STATE SUPERINTENDENT OF EDUC. (Apr. 2024), <https://osse.dc.gov/page/2023-24-school-year-enrollment-audit-report-and-data> (last visited Apr. 3, 2025) (while SY24-25 audited enrollment data is now available, it was not yet published at the time of this analysis).

Table 2. DCPS Special Education Enrollment for SY 2023-24

Special Education Level	Number of Students Enrolled
1	4,209
2	1,689
3	921
4	1,453
Total	8,272

Table 3. DC Public Charter School Special Education Enrollment for SY 2023-24

Special Education Level	Number of Students Enrolled
1	2,984
2	2,050
3	953
4	1,492
Total	7,479

The District of Columbia prioritizes the needs of students with disabilities through inclusive policies and practices and transparent resource allocation. The District’s LEAs implement IEPs that are designed to meet each student’s unique needs without being constrained by budget limitations. LEA IEP Teams develop IEPs based on a review of each student’s individual need for supports and services designed to enable the student to receive educational benefit.

Central to this commitment is the principle of a least restrictive environment (“LRE”), which integrates students with disabilities into general education settings to the greatest extent possible with the use of appropriate support and services pursuant to the Individuals with Disabilities Education Act (“IDEA”) and District regulations.²³ All LEAs, including traditional public and charter schools, are required to provide students with disabilities education in the LRE, including making available a continuum of services to promote inclusion and community.²⁴

To empower families, DC emphasizes transparency and provides comprehensive resources for parents and guardians. Guidance from OSSE is available to support IEP development, dispute resolution, and access to services.²⁵ Additionally, entities such as the DC Ombudsman for Public Education’s Special Education Hub offer online tools including up-to-date information on rights, responsibilities, and strategies to navigate the complex education system.²⁶ Families also have access to advocacy support through the federally funded

²³ See 20 U.S.C. 1412(a)(5).

²⁴ 5-A DCMR § 3002.2-3.

²⁵ *Specialized Education Local Policy Guidance*, OFF. OF THE STATE SUPERINTENDENT OF EDUC., <https://osse.dc.gov/service/specialized-education-local-policy-guidance> (last visited Jan. 31, 2025).

²⁶ See e.g., *Eligibility & Implementation*, DC SPECIAL EDUC. HUB, <https://specialeducation.dc.gov/page/eligibility-implementation> (last visited Jan. 31, 2025).

Parent and Training Information Center, which connects them with trained professionals to address concerns and collaborate effectively with schools.²⁷ The focus on transparency and resource accessibility aims to provide students with disabilities the support needed to achieve equitable outcomes.

²⁷ *Parent Training and Information Center*, ADVOCATES FOR JUSTICE & EDUC., INC., <https://www.aje-dc.org/training-2/> (last visited Apr. 3, 2025).

Considerations for the Funding Study Recommendation

Establishing Alignment on the Working Group Focus Area

Working Group members and the *2023 School Funding Study* confirmed that students who need both specialized services and higher amounts of time with a dedicated aide require additional resources that often result in difficult tradeoffs in school spending plans.²⁸ According to the evidence presented, the primary funding gap arises from the personnel costs required to support students with disabilities who have the highest needs. Both in the written report and in discussion with Working Group facilitators, the study's authors noted that, outside of this demographic of students, special education in the District is adequately funded.

While the *2023 School Funding Study* offered a recommendation to adjust the UPSFF by adding a weight for the District's highest needs students with disabilities, it did not explicitly define "highest need." Prior to considering this recommendation for implementation, the Working Group clarified baseline definitions using their interpretation of the study's recommendation alongside existing laws and members' professional experiences and observations of LEA practices. The consensus definitions are found in the Working Group Recommendations section below.

For example, terms like "one-to-one aide" or "full-time aide" are commonly used in the field; however, they lack a formal definition in special education law and underlying legal authorities. To address this, the Working Group operationalized the term to mean a dedicated aide that provides 24 or more hours weekly of support to an individual student. This threshold was chosen to be consistent with the 24-hour threshold currently in place for LEAs to receive Level 4 special education funding. Examples of those eligible "full-time" aide responsibilities include but are not limited to:

- Accompanying students throughout the day from bus arrival to bus dismissal;
- Assisting students during lunch;
- Accompanying students to the bathroom;
- Checking health care devices (e.g., tracheostomy tubes); and
- Providing specialty services during class time.

Examples of responsibilities not included:

- Only walking with students between classes;
- Only providing services during behavior breakouts; and
- Providing services to multiple students simultaneously.

²⁸ See Afton Partners, Augenblick, Palaich & Associates, and Metropolitan Strategies and Solutions, *2023 School Funding Study Final Report*, OFF. OF THE DEPUTY MAYOR FOR EDUC. (Dec. 2023), <https://dme.dc.gov/fundingstudy> (last visited Apr. 3, 2024).

Through the discussions, OSSE identified a need to provide non-regulatory guidance on considerations for IEP teams when determining if a student requires a dedicated aide. OSSE intends to develop and release this guidance in 2025. This guidance may also include Working Group members' feedback on best practices for student progress monitoring, the fading of intensive supports, and the frequency of IEP Team reviews.

Additional Proposals to Address the District's Special Education Funding Needs

While this year's Working Group was tasked with addressing a specific recommendation from the *2023 School Funding Study*, Working Group members offered myriad supplementary approaches to improve special education funding across the District. For example:

- Some members suggested that the Working Group should align with Dr. Michelle Walker-Davis' FY25 budget oversight hearing testimony to increase the special education school weight from 1.17 to 1.9.²⁹ The special education school weight is an alternative to the grade-level weight that provides increased funding for all students at a school that qualify for the weight. This increase would provide additional funding to all students at the District's two special education schools, St. Coletta Special Education PCS and River Terrace (DCPS); however, students with disabilities with the highest needs at other schools would be excluded.
- Some members stated that the criteria for "highest needs" students, was too narrow and that students with fewer than 24 specialized service hours but more than 24 paraprofessional or dedicated aide hours (or vice versa) should be explored to determine whether they have additional unmet cost needs.
- Some members identified special education programming requirements that do not have clearly identified supplemental UPSFF weights. One suggestion involved addressing the cost of LEAs' ongoing Free Appropriate Public Education obligations for students with disabilities enrolled in their LEA and attending nonpublic schools. Associated LEA costs may include but are not limited to student progress monitoring, assistive technology, and student assessment(s). Additionally, some members suggested exploring whether certain services being provided by the LEAs are adequately funded, including contracted vision and hearing instruction and evaluation (i.e., American Sign Language aide), nursing services, supports for students with disabilities receiving aftercare services, and secondary transition services for students with disabilities ages 14 or older.
- One member advocated for the UPSFF to include an increased weight for incarcerated students.

²⁹ See Testimony of Dr. Michelle J. Walker-Davis, Executive Director DC Public Charter School Board, Public Charter School Board (Apr. 11, 2024), <https://dcpcsb.org/testimony-dr-michelle-j-walker-davis-executive-director-dc-public-charter-school-board-4> (last visited Apr. 3, 2024).

Working Group Recommendations

Based on member discussions throughout the 2024-25 meeting series and materials shared before and during the meetings — including responses to a survey open to all Working Group members — the Working Group members found consensus around the clarification of the *2023 School Funding Study* recommendation. The members examined the legal, fiscal, policy, and technical challenges and requirements necessary to effectively transition the recommendation into practice, in preparation for its potential future implementation.

The members reached consensus that the study's original recommendation should align with the language used in the current special education landscape and recommend renaming "Level 4+" to "Level 5" for clarity and consistency. This revision does not change the intent of the original study recommendation. The Working Group's revised language is as follows:

Recommendation: *Adjust the UPSFF to better meet student needs by adding a new additional weight, "Level 5," for the highest need students with disabilities whose IEPs require a dedicated paraprofessional (applicable across the regular, residential, and extended school year UPSFF categories).*

The recommended weights are as follows:

- For the Special Education formula category, a new weighting of 6.40.
- For the Special Education – ESY category, a new weighting of 0.90.
- For the Special Education – Residential category, a new weighting of 5.30.

The members also agreed that the highest need students with disabilities (Level 5) would be defined as those meeting both of the following criteria:

1. Have more than 24 specialized service hours AND
2. Have more than 24 hours with a paraprofessional or dedicated aide.

Working Group members noted that the agreed-upon definition for the proposed Level 5 weight may not meet other unresolved special education funding needs. For example, students with fewer than 24 specialized service hours but more than 24 paraprofessional or dedicated aide hours, or the opposite, would not receive additional funding (e.g., a student with 54 cumulative hours distributed as 32 specialized service hours and 22 instructional hours with a paraprofessional or dedicated aide, though a student with 50 cumulative hours distributed as 25 specialized service hours and 25 paraprofessional or dedicated aide hours would). OSSE estimates there are nearly 200 such students currently enrolled across the District. Another category of students who would be excluded from this new proposed level are students with disabilities who have a 504

Plan.³⁰ Those students may have a high level of need but do not qualify for the funding because they are not students with disabilities as defined by IDEA. While this adjustment to the current special education weight addresses the needs of students who meet the two criteria, the Working Group recommends taking steps to close any remaining gaps and provide adequate funding for all students in subsequent Working Groups as soon as possible.

The Working Group reached a consensus on the technical processes and policies that need to be developed and tested prior to implementing the Level 5 recommendation.

1. Determine if the Special Programs database can accurately collect and report data on students who meet the criterion of receiving more than 24 hours of specialized services and more than 24 hours with a paraprofessional or dedicated aide. OSSE, who manages the database to gather information from LEAs about students with specialized services, would conduct a pilot testing program to ensure the system can provide accurate and timely data. Working Group members have emphasized the need for greater confidence in the system's functionality, and this process will help confirm its consistent data accuracy for both OSSE and LEA usage.
2. Ensure that OSSE provides reports to LEAs, before Enrollment and Child Count Day, that include disaggregated information on special education distributions. These reports should identify which students would qualify for the proposed Level 5 weight and align with the outcomes of the Special Programs testing pilot.
3. Revise OSSE's Enrollment Audit process to reflect the application of the proposed Level 5 weight in all enrollment categories.
4. Reassess the budgetary implications of the proposed Level 5 weight addition following the completion of the Special Programs data review. While current budget estimates are based on preliminary data from OSSE's Special Programs data system, the review will confirm its ability to provide accurate information. Once this confirmation is achieved, the budget impact should be updated accordingly.

There is no intended impact on LEA IEP decision-making processes to determine individual students' LRE because the recommended Level 5 definition would be available to any student who meets the two criteria, regardless of the student's educational environment.

³⁰ 29 U.S.C. § 794.

Estimated Costs and Potential Budget Implications

Any change to the UPSFF requires an examination of the fiscal impacts to the District. Implementing the Working Group’s recommendation would likely have a substantial cost.

The District proudly invests significant resources in its students and schools. Federally compiled data show that, as of 2022, the District of Columbia ranked second in the nation for per-pupil expenditures.³¹ While determining special education funding across all 50 states is much more complex and not easily comparable, the District directs significant resources toward educating special education students.³²

As described earlier in this report, the FY25 UPSFF foundation weight of 1.0 equals \$14,668, and the District provides additional per-pupil resources for LEAs to serve students with disabilities based upon four levels of disability, with increasing resources for each increasing level of need. The table below outlines the comparison of Special Education Level 4 and the proposed Special Education Level 5 supplemental amounts.

UPSFF Special Education Level 4 & Proposed Level 5 Weights & Amounts

	Level 4 - Current (Weight)	Level 5 - Proposed (Weight)	Level 4 - Current (Amount)	Level 5 - Proposed (Amount)
Special Education	3.49	6.40	\$51,191	\$93,875
Special Education, ESY	0.491	0.9	\$7,202	\$13,201
Special Education, Residential	2.89	5.3	\$42,390	\$77,740

As a baseline (i.e., with no other factors that could increase funding such as at-risk or English learner status), for students identified as a Level 5, LEAs would receive \$93,875 per student. LEAs would receive an additional \$13,201 per student for extended school year services and \$77,740 per student for residential programs. Given the significant resources that would be required to implement a new Level 5 weight, it is critical that all special education data is accurate and that sufficient monitoring and oversight procedures are in place.

For example, to increase qualifying specialized services hours, some LEAs are currently adding the total working hours that an aide is with a child regardless of the type of assistance the aid is providing. OSSE should explore this issue further to determine the extent of this practice and to provide technical assistance to LEAs to enhance their reporting practices. Such exploration is essential to appropriately stewarding the public resources needed to implement the proposed Level 5 weight.

³¹ 2022 Public Elementary-Secondary Education Finance Data: Table 11: States Ranked According to Per Pupil Public Elementary-Secondary School System Finance, U.S. CENSUS, <https://www.census.gov/data/tables/2022/econ/school-finances/secondary-education-finance.html> (last visited Jan. 30, 2025).

³² 50-State Comparison: Special Education Funding, EDUC. COMM’N OF THE STATES, <https://reports.ecs.org/comparisons/k-12-funding-2024-04> (last visited Apr. 7, 2025).

Overall Cost Estimate

The Working Group explored current and historical enrollment data to estimate the costs of implementing a Level 5 weight. The Working Group estimated that approximately 490 students distributed across 34 LEAs would qualify for Level 5 funding, which would increase special education funding by more than \$17.5 million annually. This figure does include the costs for students receiving residential and extended school year services, which would require an additional \$35,350 and \$5,999 per qualifying pupil, respectively. This estimate is calculated based on FY25 UPSFF weights.

As discussed in the Working Group Recommendations section, there are several state data system enhancements, data collection practice improvements, and enrollment audit process modifications that need to be implemented before the most accurate budget estimate could be generated. Working Group members agreed that this budget estimate would need to be revisited once the data and LEA verification processes are implemented. Working Group members also discussed the potential timing of implementing the recommendation. Taking into account the District's budget formulation timeline, multiple members stressed moving this recommendation forward for implementation as soon as possible given the expressed need.

The District supports providing adequate funding to serve our highest needs students. Where appropriate, the District must also prioritize existing initiatives and current programs to meet the needs of our students with the current funding structure.

Acknowledgement

The facilitators appreciate the Working Group members' expertise, time, and collaboration in developing these recommendations. The Level 5 weight is an identified need that will be considered for potential future implementation after the identified technical and policy considerations are implemented.

Appendix A: Working Group Members

Facilitators

- Justin Flemings – Office of the State Superintendent of Education
- Gabriel Montague – Office of the State Superintendent of Education
- Jenn Comey – Office of the Deputy Mayor for Education
- Troy Eckles – Office of the Deputy Mayor for Education

Members

- Hannah Blumenfeld-Love – DC Special Education Hub
- Julie Camerata – DC Special Education Cooperative
- Chelsea Coffin – DC Policy Center
- Allen Francois – District of Columbia Public Schools
- Victoria Glick – Office of the State Superintendent of Education
- Jeffrey Grant – Monument Academy PCS
- Regina Grimmett – District of Columbia Public Schools
- Robert Hanna – Office of the State Superintendent of Education
- Daniel Hanower – Office of Budget and Performance Management
- Rochanda Hiligh-Thomas – Advocates for Justice and Education, Inc.
- Madeline Houck – DC Public Charter School Board
- Louis Hubner – The Children's Guild DC PCS
- Quibilah Huddleston – The Education Trust
- Jake Lappi – District of Columbia Public Schools
- Rory Lawless – Office of the Deputy Mayor for Education
- Tamera Lewis – DC Charter School Alliance
- Alonso Montalvo – Office of the Chief Financial Officer
- Michael Olivarri – St. Coletta Special Education PCS
- Mayank Palod – Appletree Early Learning PCS
- Leila Peterson – School Talk DC
- Stephen Regis – Office of the Chief Financial Officer
- Jennifer Rosenbaum – District of Columbia Public Schools
- Valeria Sanders – DC Public Charter School Board
- Catherine Sanwo – Friendship PCS
- Timothy Sell – Office of the Deputy Mayor for Education
- Jonathan Weinstein – KIPP DC PCS
- Megan Williams – Office of the State Superintendent of Education

Appendix B: School Year 2024-2025 UPSFF Funding Amounts

FY25 UPSFF Rates	
Foundation level per pupil	\$14,668

General Education		
Grade Level	Weighting	Per Pupil Allocation
Pre-Kindergarten 3	1.34	\$19,655
Pre-Kindergarten 4	1.30	\$19,068
Kindergarten	1.30	\$19,068
Grades 1	1.00	\$14,668
Grades 2	1.00	\$14,668
Grades 3	1.00	\$14,668
Grades 4	1.00	\$14,668
Grades 5	1.00	\$14,668
Grades 6	1.08	\$15,841
Grades 7	1.08	\$15,841
Grades 8	1.08	\$15,841
Grades 9	1.22	\$17,895
Grades 10	1.22	\$17,895
Grades 11	1.22	\$17,895
Grades 12	1.22	\$17,895
Alternative	1.58	\$23,175
Special Education School	1.17	\$17,162
Adult	1.00	\$14,668

Special Education		
	Weighting	Per Pupil Allocation
Level 1	0.97	\$14,228
Level 2	1.20	\$17,602
Level 3	1.97	\$28,896
Level 4	3.49	\$51,191
Special Education Compliance		
	Weighting	Per Pupil Allocation
Special Ed Compliance	0.099	\$1,452
Attorney's Fees Supplement	0.089	\$1,305

OSSE's Report on the Uniform Per Student Funding Formula

English Language Learners		
	Weighting	Per Pupil Allocation
Elementary - EL	0.50	\$7,334
Secondary - EL	0.75	\$11,001

Special Education-Residential		
	Weighting	Per Pupil Allocation
Level 1 Residential	0.370	\$5,427
Level 2 Residential	1.340	\$19,655
Level 3 Residential	2.890	\$42,391
Level 4 Residential	2.890	\$42,391

English as a Second Language Residential		
	Weighting	Per Pupil Allocation
LEP/NEP Residential	0.668	\$9,798

Residential		
	Weighting	Per Pupil Allocation
Residential	1.67	\$24,496

At-Risk		
	Weighting	Per Pupil Allocation
At-Risk Students	0.30	\$4,400
HS Over-Age Supplement	0.06	\$880
At-Risk Concentration > 40%	0.07	\$1,027
At-Risk Concentration > 70%	0.07	\$1,027

Special Education Add-ons & (ESY)		
	Weighting	Per Pupil Allocation
Level 1 ESY	0.063	\$924
Level 2 ESY	0.227	\$3,330
Level 3 ESY	0.491	\$7,202
Level 4 ESY	0.491	\$7,202

OSSE's Report on the Uniform Per Student Funding Formula

Facilities Allowance (Charter Schools only)	
Non-Residential Facilities Allotment	\$3,734
Residential Facilities Allotment	\$10,083

Appendix C: Public Comment

No public comments received.