

Walker, Valida (OSSE)

From: Megan Reamer <mreamer@ccpcs.org>
Sent: Friday, February 03, 2012 4:07 PM
To: OSSE Comments (OSSE)
Cc: Karen Dresden
Subject: Comments on ESEA Flexibility Request Draft -- Capital City PCS

To: Office of the State Superintendent of Education

From: Karen Dresden, Head of School, and Megan Reamer, Data Manager, Capital City PCS

Date: February 3rd, 2012

Re: ESEA Flexibility Request

In response to the OSSE's draft ESEA Flexibility Request, Capital City PCS would like to submit the following comments and suggested revisions.

Principle 2.A (School Level Reporting)

Concern: Capital City is concerned that the proposed cross-sector report, which includes a number of new indicators that are not currently tracked, will conflict with the PMF and School Scorecards already published by PCSB and DCPS, respectively. The OSSE's stated goal is to provide high quality information to parents and students, but adding an additional list of indicators (some duplicative and others not) seems likely to increase, rather than reduce, confusion. Additionally, several of the proposed indicators would require schools to collect and submit information that is not currently tracked – for example, the percentage of students completing college or graduating from career preparation programs. Finally, two of the indicators strike us as inappropriate and possibly even detrimental to students. The first of these is the 'On-track-to-graduate' measure, which would require schools to report the percentage of students promoted from one high school grade to another each year. This measure will almost certainly have the unintended consequence of encouraging social promotion at some LEAs. Another questionable indicator is the percentage of students demonstrating 'adequate growth' on the ACCESS assessment. It is not clear that tracking this type of growth is an appropriate use of the ACCESS data, and this issue should probably be considered more closely.

Suggestion: The OSSE should allow for a bifurcated accountability structure by which PCSB continues to publish the PMF and DCPS continues to publish the School Scorecards. A third list of indicators is unnecessary at this time, given the significant time and energy that have gone into creating the PMF and School Scorecards in recent years. While not exactly the same, the PMF and the Scorecards have quite a few similarities, and, in conjunction with the information published on the FOCUS website, provide parents and students with a fair amount of easily digestible information about DC schools. Since both of these measures were released for the first time this year, it seems that familiarizing parents with the information that is currently available would be more effective than introducing a new list of indicators.

Principle 2.B (AMOs)

Concern: Capital City is concerned about the addition of the Growth AMO as well as the Graduation/Attendance AMO. The over-arching concern is that the introduction of two new AMO categories (Growth and Graduation/Attendance, in addition to Proficiency) would add between 15 and 30 new category/subgroup combinations in which schools have to make continual progress year over year, since each of the new AMOs requires progress for the school overall, as well as for each NCLB subgroup. Statistically speaking, it is unlikely

that a school with 5 or 6 subgroups will be able to consistently demonstrate progress on every AMO in every subgroup and subject area – particularly since the students included in any given subgroup change each year. Regarding the Growth AMO specifically, the concern is that OSSE proposes a new growth measure (in addition to the MGP and TVA). The introduction of three growth measures all in one year is not advisable, particularly since the MGP is a common measure that is already used by all schools. For the Graduation/Attendance measure, a concern is that no ceiling is mentioned in the waiver. For example, a school that has 97% attendance one year should not be penalized for 96% attendance the next year. Under the current terms described in the waiver, this appears to be a possible outcome.

Suggestion: For the Graduation/Attendance AMO, the waiver should set a clear ceiling above which schools would be exempted from the progress requirement, and should target this AMO to schools that have consistently demonstrated problems with attendance and/or graduation rates. This would seem to be an easy fix, and perhaps the OSSE is already planning to do this. However, the Growth AMO is more complicated. In principle, Capital City supports the move to measures focused on the growth of all students rather than proficiency vs. non-proficiency. However, we do not support the rapid adoption of a new growth measure that schools have not had a chance to investigate. Rather, we suggest that OSSE consider making use of the Colorado-style school-wide MGP, which is already calculated for all charter and DC Public schools. It is true that the MGP does not lend itself to a requirement for year-over-year increases. However, it would be possible to calculate the MGP by subgroups within schools, and OSSE could implement a system by which schools receive full credit for the Growth AMO if each of their subgroups has an MGP at or above the 40th percentile (for example). An added advantage of this method is that it is similar to the way in which the PMF handles MGP reporting. If OSSE is not amenable to any of these suggestions, Capital City would advocate for the simple adoption of Option A for school accountability AMOs (decreasing the proficiency gaps for all subgroups by half over six years), rather than the creation of an Option C.

Thank you for your consideration of these concerns.

Walker, Valida (OSSE)

From: Sydney Bergman (ES) <sydney.bergman@dc.gov>
Sent: Sunday, February 12, 2012 3:57 PM
To: Lord, Mary (OSSE); OSSE Comments (OSSE)
Subject: Re: DC's No Child waiver proposal - should science 'count' for school accountability?

Mary,

Thanks for getting in touch about this. I'm of two minds about it: One, I would like to see science get more of an emphasis, and if being tested is the way to get that emphasis, then I see it as a necessary compromise.

Two, and this is a fairly large caveat, testing must be thoughtful and scientifically accurate. I like that the College Board has revised the AP Biology curriculum to focus more on processes of science and inquiry. I like the transparency of the grading process, and the fact that the College Board offers extensive support material and community for AP teachers, and actively recruits science educators to be part of the test development, review, and revision. The AP is held to high standards in terms of accuracy, as well, which is something I've had issues with concerning DC's standardized science tests.

So, if DC is willing to offer materials, support, an open and supportive community, a clear science curriculum, and an emphasis on inquiry, I would be fine with testing. But as of right now, those things aren't offered, so I have major issues with being tested on content that is not actively supported.

Thanks,
Sydney

Sydney Bergman
Biology Teacher
School Without Walls SHS
2130 G Street NW
Washington, DC 20037
sydney.bergman@dc.gov
biowithoutwalls.com

On Fri, Feb 10, 2012 at 7:10 PM, Lord, Mary (OSSE) <Mary.Lord@dc.gov> wrote:
Lynn and Maya - I'm copying Wilson HS physics teacher Angela Benjamin and School Without Walls science dept. Chair Sydney Bergman as well as OSSE's science and math assessment+standards chief, John Neral.

As you may know, DC and 28 other states are applying this month for a waiver from some of NCLB's most draconian mandates - like the provision that every child be reading and doing math on grade level by 2014.

DC is considering making science part of the new accountability measures. Oklahoma, which just won approval from the US Dept. Of Ed., is going to make science count.

OSSE has held lots of public forums, with science coming up at some. Some science teachers say we should add science, because we value what gets measured and that will put science back into the curriculum,

particularly for elementary students. Others say the test will drive or dictate instruction and run counter to inquiry, field work, etc.

I'd like to know what seasoned science educators think of the idea.

Drop me and/or osse.comments@dc.gov a note and tell us what you think we should propose.

Mary
Mary Lord
DC State Board of Education, Ward 2
(and the board's science proponent)

Join Mayor Gray at the One City Summit on February 11, 2012
Let Your Voice Be Heard – Help the District become a more livable, vibrant, and inclusive city – for everyone.
Open to all DC residents
Sign up at www.onecitysummit.dc.gov

Join Mayor Gray's One City • One Hire - 10,000 Jobs Campaign
"Putting District Residents Back to Work – One Hire at a Time"
Learn more at <http://onecityonehire.org>



Public Charter High School

February 13, 2011

Dear Office of the State Superintendent:

I write on behalf of Thurgood Marshall Academy to provide comments regarding the District's ESEA Waiver, dated January 18, 2012. Thurgood Marshall Academy would like to express its concern about several areas in the application.

- Ranking of schools: Thurgood Marshall Academy would like to express concern about the proposed system of identifying reward, good standing, continuous improvement, focus and priority schools. The proposed system does not take into account the academic differences that exist between elementary and secondary schools. Thurgood Marshall Academy would urge OSSE to create a system in which elementary and secondary schools would be ranked separately. Moreover, high schools should be separated from all lower level schools as high schools have additional challenges and must meet graduation criteria absent from lower level schools.
 - Second, the District has various specialty schools (magnet programs, full-time special education programs, adult education programs) which should not be include in the ranking of all open-enrollment schools. The District, because of its size, is not able to capture the existence of the specialty schools within a small set of schools. As such, schools such as magnet schools and full-time special ed schools will consistently be ranked on top whereas the admission criteria do not parallel those of open-enrollment schools.
- Science Testing: Thurgood Marshall Academy is concerned about the inclusion of science testing in its current form as part of the AMO. First, science testing is not currently being assessed towards AYP in the District. This new accountability measure puts undue burden on science teachers and students in the immediate future. Second, the use of the half-weight for science in SY 11-12 creates even more confusion for parents in

a system that is already unclear. Changing the testing requirements every school year for the next three school years puts undue burden and confusion on schools, students, and parents. Thurgood Marshall would strongly urge OSSE to consider postponing the inclusion of science for two years when the PARCC assessment system is introduced.

- **Composition Testing:** Thurgood Marshall Academy is concerned about the inclusion of composition testing in its current form as part of the AMO. First, composition testing is not currently being assessed towards AYP in the District. Conversely, new prompts and new formats are being piloted in SY 11-12. Using a pilot format of an assessment as part of an AMO clearly defeats the purpose of a pilot. Thus, the new accountability measure puts undue burden on composition teachers and students in the immediate future. Second, the use of the half-weight for composition in SY 11-12 creates even more confusion for parents in a system that is already unclear. Changing the testing requirements every school year for the next three school years puts undue burden and confusion on schools, students, and parents. Thurgood Marshall would strongly urge OSSE to consider postponing the inclusion of composition for two years when the PARCC assessment system is introduced.
- **Section 2.A.ii-** Thurgood Marshall Academy supports the use of growth measures. However, the schools is gravely concerned about the increases in accountability indicators for LEAs. The current system measures reading, math, graduation and participation at the LEA level, school level and for sub-groups. However, the proposed system increases the number of indicators to over 60. Rather than simplify the confusion around AYP and NCLB, the proposed system creates a tangled web of indicators that become more difficult for parents to understand and schools to decipher. Thurgood Marshall Academy would urge OSSE to consider means to reduce the number of indicators and streamline reporting with other external facets such as the PMF, the current accountability measure for charters schools. Growth measures are currently in use by the District of Columbia Public Schools and all charter schools as part of their own accountability measures. Creating yet another system of growth measure creates vast confusion.
- **Section 2.B (page 41).** Thurgood Marshall Academy would urge OSSE to consider Option A instead of Option C. Option A allows the SEA to reduce by half the number of

students not proficient, an admirable goal. In a city-state where more than half of students are not proficient in math or reading, reducing this total by half would be an audacious task and one LEAs could easily rally behind. Option C, on the other hand, creates confusing and cumbersome systems that increase the number of reporting factors for schools. By selecting Option A, OSSE gains transparency and buy-in from LEAs and parents. .

- **Lowest performing schools:** The waiver currently states, “OSSE is also providing RTTT funding to DC Public Schools in its school turnaround work, applying one of four turnaround models to the persistently lowest-achieving 5% of schools as well as the broader lowest-achieving 20% of schools. OSSE plans to increase capacity and provide additional support to the lowest-achieving 20% of schools through a newly formed Office of Innovation and Improvement.” The role of OSSE in response to charter schools requires a much clearer definition. The Public Charter School Board is responsible for oversight of all charter schools. The incorporation of OSSE into school oversight and monitoring changes the role of the agency from compliance monitoring to school quality. The DC School Reform Act explicitly gives school authority over quality to the Public Charter School Board. The inclusion of OSSE as a quality school monitor violates the DC School Reform Act.
- **Human Capital:** Thurgood Marshall Academy full supports the use of teacher evaluation systems. However, Thurgood Marshall Academy suggests that the 50% of student achievement measure be redefined. Currently, the measure requires a teacher’s evaluation to consist of 50% student growth on the state test in tested grades 4-8. However, this only represents about 17% of all teachers in the District. The requirement places undue burden on select teachers while creating barriers to recruitment. Thurgood Marshall Academy is not opposed to using 50% as a marker of student achievement for teacher evaluations; but, we would urge OSSE to consider redefining the 50% to include at minimum 30% for direct student growth from assessments given the changing assessments in the District for the next three years.
- **Human Capital:** Thurgood Marshall Academy urges OSSE to remove language about mandating professional growth for teachers who are not performing. Charter schools hire teachers at will on one-year contracts. A state level mandate to provide professional

growth to teachers creates undue legal burdens on schools who may be faced with litigation for non-contract renewal and provisions of professional growth. The use of professional growth for LEAs should be a LEA by LEA decision rather than state policy.

- School Data: On page 35 of the application OSSE outlines key descriptors for data collection from LEA. Thurgood Marshall Academy supports the use of robust data systems, but cautions the use of such data without proper LEA verification. Currently, systems do not exist to collect such data. Thurgood Marshall Academy is concerned about the undue burden on LEAs to collect data such as college alumni rates, college enrollment or retention of effective teachers, among others. First, state-wide operational definitions do not exist creating a hodgepodge of reporting. Second, systems do not exist to currently efficiently collect such data. Placing the burden on LEAs increases the reporting requirements for LEAs conflicting the purpose of the waiver.

Sincerely,
Alexandra Pardo
Executive Director

To: Office of the State Superintendent of Education
From: Jennifer C. Niles, Founder and Head of School
Date: February 14, 2012
Re: ESEA Flexibility Waiver Application

E.L. Haynes has the following comments and suggestions for the Office of the State Superintendent of Education's (OSSE) *ESEA Flexibility Request* dated January 18, 2012. While the goals of the waiver may be laudable, the current proposal has a number of areas in which we are concerned. Chief among them is that the waiver does little to recognize local education agencies' (LEA) work towards the goals in the District's Race to the Top grant and, therefore, may be a missed opportunity to capitalize on several initiatives already underway. This is most evident in the District's proposal for setting new Annual Measureable Objectives (AMOs) and the section on evaluating teachers and leaders. The proposal also lacks specifics on plans required to implement the initiatives found in the waiver request and, for this reason, we worry that it may create more challenges than solutions to existing problems.

We also have several specific concerns with the current proposal:

Parent Based Accountability

The current draft suggests that parents do not have a reliable way to compare school quality across the District of Columbia. While this may have been true in the past, we do not believe that this is the case now. In fact, last year the Race to the Top student growth working group (with representatives from District of Columbia Public Schools (DCPS), the Public Charter School Board (PCSB) and many local charter schools) created a common growth measure to be included in the accountability frameworks for both charters and DCPS. There is other information available for a parents looking to make decisions about schools in the District of Columbia and it is unclear why a different "cross-sector" report is necessary. *See* FOCUS School Chooser.

The proposal does not at all address any plan to mitigate the risk of potential confusion if the information is presented in different formats or process for ensuring the data does not conflict- a current problem in the existing systems. The proposal also indicates that OSSE will also collect other information from LEAs and schools to include in the reports. *See* Page 34. Currently, charter school LEAs are asked to submit accountability information to the Public Charter School Board (PCSB) and OSSE on different forms, using different calculations and often times at different points throughout the year. Putting additional reporting burden on charter schools to achieve this goal is antithetical to the stated goals of this waiver – to minimize the reporting burden on LEAs. This waiver application should stress how data collection can be streamlined and not focus on creating commitments to collect new and different pieces of data. Additionally, the proposal should include information about how any cross-sector reporting will minimize the potential for the same data to be shared in different formats, thereby adding to parent or consumer confusion.

The proposed reporting elements in the cross-sector report are also disadvantageous to schools with a higher number of English language learners and students identified for special education services under the Individuals with Disabilities Education Act (IDEA). The current proposal calls for using “Growth on ACCESS for ELLs” to report on the number of students that made growth targets. According to the researchers at the WIDA Consortium (developer and vendor for the ACCESS assessment) the growth on ACCESS is dependent on several factors including age and proficiency level. Any model that does not account for these factors will produce biased results. Therefore, we would propose an accountability structure for ELL students that considers a broader range of factors including proficiency, previous access to language instruction in both English and native language, and the student’s age.

The proposal would also identify “the quality of the special education programs” as determined by the rating on the quality and compliance metric. This metric is not fully described in the application and we have similar concerns about using any single factor to rate the quality of any educational program. This is especially true for organizations that experience large growth in any a sub-group for any single year or continuously educate large numbers of students in these sub-groups.

Inclusion of Science and Composition Assessments

The current proposal mentions using District of Columbia Comprehensive Assessment System (DC CAS) Composition and Science assessments for accountability in future years. While we value both of these as important subject areas, we know little about how these assessments align to current standards and because they have not been used previously for high-stakes accountability decisions, schools have not focused on aligning curriculum to these assessments. As such, adoption would require re-alignment of curriculum and the evaluation of the scope and sequence at all LEAs and schools. This is an enormous burden given the fact that our English language arts and math assessments will also be changing significantly over the next three years. It is important to identify where LEAs should spend the limited resources available for re-aligning curriculum and focus on the Common Core instead of new subject areas that will require the re-alignment upon the adoption of new science standards. Until the current English language arts and math assessments are launched by the PARCC consortium, the District should not add any other “high-stakes” assessments.

Adjusting Annual Measurable Objectives

The current proposal lacks overall clarity about how the AMOs will be established and does not provide any data to support the decision to include additional measures, such as growth, to the existing accountability structure. The lack of clarity concerns us because a change may result in new onerous requirements. Additionally, given the fact that the District of Columbia Charter Authorizer (PCSB) spent the last two years developing and implementing a new accountability system and a student growth measure was added to this system last fall, adding a different accountability system next year does not make sense.

The current application also proposes the creation of a new growth measure. We are currently using both the individual value-added growth calculation for teacher evaluation and median growth percentile measure for school-level determinations. Therefore, a new measure is not necessary. The

use of growth for accountability, or AMOs, also deserves additional consideration given what we know from the school-level results provided this year. For instance, according to OSSE's contractor, growth is unreliable from year to year, especially for small "n sizes" and sub-groups. Before any decision is made to use growth for AMOs, data should be provided to support the inclusion of additional factors in the accountability determinations and this data should be provided to LEAs for public comment. In order to facilitate this process, the inclusion of growth in the accountability determination should be, at a minimum, delayed until 2012-13 school year for all LEAs. Alternately, we would suggest selecting "Option A," which bases AMOs solely on proficiency until more is known about the implementation of different "school-level" growth models.

Teacher and Leader Evaluation

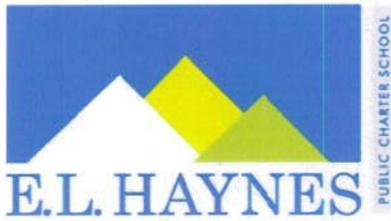
District of Columbia charter schools have an unprecedented amount of autonomy to handle matters as they relate to personnel. The current proposal infringes on this autonomy granted under the D.C. Charter Act passed by Congress and later codified in the District of Columbia Code. *See* D.C. Code § 38-1802.04(b)(7) (Charters shall have the power "to be responsible for the public charter school's operation, including preparation of a budget and personnel matters".)

Whatever proposal is created, it must only be made on an "option-in" basis. This is to say that charters should, under District of Columbia and Federal law, be able to retain authority to evaluate personnel in whatever manner they see fit.

As a participating Race to the Top LEA, we have agreed to evaluate our teachers annually, using growth on assessments when available. The flexibility proposal is different in two ways: 1) there is no funding for participation as was the case in Race to the Top; and 2) this proposal mandates the use of student achievement in non-tested grades and subjects.

What we know from implementing Race to the Top requirements this year is that it is difficult, time consuming and labor intensive when you attempt to do it in a thoughtful manner. While we have strived to be exemplary in our performance, we know we have a long way to go in how we think about measuring student achievement in untested grades and subjects. These problems are particularly profound when you have campuses without any tested grades or subjects. With the proper support, we are confident we can get there; however, this support should be thoughtful and deliberate. It should include a larger pilot of assessments and the targeted development of assessments in priority grades and subjects. It should not, as it does currently, simply mandate that this will be added to a list of requirements until we know more about the availability of quality assessments aligned to the common core and the impact of using existing assessments for teacher evaluation.

We hope you will consider these comments as you work to modify the existing proposal. Because we know that this is only the beginning of the waiver process, we also encourage OSSE to consider the development of a task force to address questions or comments received by the peer review panel assigned to OSSE's flexibility request. In this way, OSSE can ensure a continued and ongoing dialog and engagement with the charter community. Charter leaders are uniquely positioned to



Georgia Avenue Campus

3600 Georgia Avenue, NW
Washington, DC 20010
(202) 667-4446 (Grades 3-8)

Kansas Avenue Campus

4501 Kansas Avenue, NW
Washington, DC 20011
(202) 706-5828 (Grades PS-2)
(202) 706-5838 (Grades 9-12)

info@elhaynes.org
www.elhaynes.org

comment on the burden of multiple data requests from OSSE and PCSB, the resources required to implement teacher and leader evaluations and the effects of other policy decisions on our parent communities- we look forward to your continued engagement on these issues.

KIPP DC RESPONSE TO D.C. ESEA FLEXIBILITY WAIVER REQUEST 2.14.2012

We support the state applying for ESEA flexibility. This document outlines the major concerns that KIPP DC would like addressed before the final waiver is submitted to the U.S. Department of Education by OSSE.

Assurances:

- #5 – We have concerns about the collection and reporting of data regarding student college matriculation and attendance. Particularly, we have concerns regarding students who are attending schools that are not in the Clearinghouse database.

Principle 1:

- In lieu of converting science and composition tests into high stakes tests, we propose that OSSE provide the following supports prior to considering the tests for inclusion in any accountability system:
 - Delivery of electronic data from the science and composition tests contemporaneously with reading and math data
 - Publishing of science and composition data contemporaneously with reading and math data
 - Delivery of technical assistance in the areas of assessment interpretation, and standards attainment
 - Formation of a state-wide taskforce to critically examine the science test and determine what improvements are necessary prior to becoming a high stakes assessment

Principle 2:

- The current description of the PMF is inaccurate. Substitute language from the PCSB.
- Add language stressing the commonalities between the DCPS scorecard and the PCSB PMF report cards
- We support the concept of an accountability index that gives credit for both proficiency AND growth. This index should be designed such that it never identifies more than 20% of schools (between Focus schools and Priority schools)
- Additionally, we support the creation of an attendance AMO that does not require schools to improve attendance, but sets a bar for acceptable performance.
- We support the creation of a cohort graduation index as an AMO that gives credit for not only 4 year graduates, but also partial credit for 5 and 6 year graduates, as well as students who receive GEDs.
- Remove the category of "continual improvement" schools – as schools that are not priority nor focus should not be subject to state prescribed interventions
- We support the intervention model and strategies submitted by PCSB in their comments (for both Priority and Focus schools)

Principle 3:

- Acknowledge, in writing, that non-RTT schools in good standing are exempt from Principle 3
- Acknowledge, in writing that RTT schools are exempt from any requirements not specifically enumerated in their RTT MOUs

Walker, Valida (OSSE)

From: N'Deye Diagne <ndiagne@wmstpchs.net>
Sent: Tuesday, February 14, 2012 9:30 AM
To: Bessler, Robin (OSSE)
Subject: ESEA Flexibility - WMST
Attachments: Comment and Question Sheet for the ESEA Flexibility Request Application.docx; ESEA Flexibility.docx; flex application response - English dept.docx

Hi Robin,

These are the faculty's comments and questions for the Flexibility Application. I hope that it is not too late.

Thanks

Diagne

From: Bessler, Robin (OSSE) [mailto:robin.bessler@dc.gov]
Sent: Wednesday, February 08, 2012 9:07 AM
To: N'Deye Diagne
Subject:

I came into work today and I was handed a New Year's card from WMST that you sent before Christmas. Apparently someone felt the need to hold onto it for a while....LOL

Anyway, thanks for the card!

Robin Bessler
Education Policy and Compliance Specialist, Teaching and Learning
Elementary and Secondary Education
Office of the State Superintendent of Education
810 First Street NE, #5025C
Washington, DC 20002
202.724.5239 (Desk)
202-506-0802 (Mobile)
202.741.6412 (Main OSSE)
202.741.0227 (facsimile)
Robin.Bessler@dc.gov

www.osse.dc.gov

Join Mayor Gray at the One City Summit on February 11, 2012

Let Your Voice Be Heard – Help the District become a more livable, vibrant, and inclusive city – for everyone.

Open to all DC residents

Sign up at www.onecitysummit.dc.gov

Comment and Question Sheet for the ESEA Flexibility Request Application

Departments: Interdisciplinary (Humanities)/Foreign Language

Principle Number : 2

Section: D

Comments:

Although there is a six year program, there are no criteria for passing in the 5th year if the other years are failures. The process could be endless!

Questions:

1. What type of curriculum is acceptable? Who will approve it for standards and content? Osse?
2. If a low performing school gets most or all of the help and high performing schools get nothing, what is the incentive to maintain a high level of performance?
3. What type of curriculum is acceptable and who will approve it for its standards and content?
4. How does this new initiative affect the implementation of the new standards?

Section E

1. Where is this going?
2. Does the school have any real input in this plan, or is this just an exercise?

Comment and Question Sheet for the ESEA Flexibility Request Application

Department: Science/Health Department

Principle Nuber: 2

Section 2B, 2C

Comment 1: The growth achievable annual measurable objective seems to be the most reasonable AMO as a basis of measuring achievement because it takes into account the fact that every student does not matriculate at the same academic level. With the current system, a student can make great strides in learning without being recognized for the progress. If growth becomes a more scrutinized factor, then we feel that schools will be seen in a better light by a more just assessment system than under the current criteria set forth by NCLB.

Comment 2: Because there is a disparity between schools with respect to the levels of proficiency of students, there seems to be a need to have a point of delineation between those schools that have significantly different percentages of proficient students. In other words, in a school where students have more room for growth (i.e. schools with higher percentages of students performing below grade level), growth would seem a more achievable goal than for a school where a high percentage of students are achieving at or above grade level.

Question 1: If the above statement is true, then should there be different weights applied to the same AMO for schools that differ in percentages of proficient and advanced students?

Question 2: With the proficiency AMO, if a disparity among the subgroups is found, then what will be the course of action for/against that school and how will that disparity affect the school's performance rating?

Walker, Valida (OSSE)

From: Irizarry, Kayleen (OSSE)
Sent: Wednesday, February 15, 2012 9:06 AM
To: Evans, Renee M. (OSSE); Noel, Jeffrey (OSSE); Lomax, Erika (OSSE); Hamilton, Sheryl (OSSE); Chait, Robin (OSSE); Reavis, Tamara (OSSE); Randolph, Khalid (OSSE)
Subject: FW: DCPS WaiverFeedback2.13.12.docx
Attachments: WaiverFeedback2.13.12.docx

Kayleen Irizarry, PhD
Assistant Superintendent
Elementary and Secondary Education
Office of the State Superintendent of Education (OSSE)
Government of the District of Columbia
810 First St., NE
Washington, DC 20002
Phone: (202) 741-0258
Cellular:
Email: kayleen.irizarry@dc.gov
Website: www.osse.dc.gov

From: Swinburn, Cate (DCPS) [mailto:cate.swinburn@dc.gov]
Sent: Monday, February 13, 2012 9:23 PM
To: Irizarry, Kayleen (OSSE)
Cc: Lesak, Kasel (DCPS); Watson, Naomi M. (DCPS-OOC)
Subject: DCPS WaiverFeedback2.13.12.docx

Hi Kayleen,

Attached please find DCPS' written feedback to the 1/18/12 version of the OSSE ESEA Waiver application. Looking forward to nailing down the Accountability Index and AMOs so as to polish this and other sections! Phew!

Please let me know if you have questions.

Thanks,
Cate

Join Mayor Gray's One City • One Hire - 10,000 Jobs Campaign
"Putting District Residents Back to Work – One Hire at a Time"
Learn more at <http://onecityonehire.org>

Pg # #(s)	Area of Concern	Rationale	Proposed Change
20, 23	Phased in Math approach	DCPS has already messaged, planned for, and believes in a full K-12 transition to CCSS in math for SY 12-13.	Full transition to CCSS mathematics for SY12-13. This requires a newly aligned 2013 math CAS. <i>*Per previous conversations with the OSSE, DCPS believes this has already been removed.</i>
21	Although the waiver addresses ELLs and the WIDA Consortia, it does not address how difficult it might be for Level 1 and 2 ELLs at the secondary level to move at a yearly rate with their peers that are non-English language learners. This will create a cohort of students on a 5 year graduation track as they are not ready to take English 1 or their first year.	DCPS has a number of students that are newly arrived with limited or interrupted schooling in their own country attending our HS. This creates a cohort of HS students that by default are on a 5 year graduation track regardless of age as they are not ready to take English 1.	Policy about these students needs to be developed by OSSE and special considerations should be made for the inclusion of this population in school reports. To be considered as part of the Accountability Index
22, 26	Modification of SEDS to include drop down menus so that Common Core Standards can be incorporated into IEPs	IEP goals should be tailored to individual students. Alignment with the Common Core will be initiated by LEAs and through training. The preference is that SEDS is not the driver of that effort.	Remove from waiver application
30	Table display should include relevant year.	N/A	Include 2011 as part of title or in the footnote.

34	Need a more detailed description of DCPS Scorecard.	Provide more information about how DCPS will be holding our schools accountable	See appendix to this document. If OSSE wishes to keep the abbreviated version, please change "Across the District" to "across DCPS" in the context of this document.
33-36	Many of the data elements described in this section already exist on the DCPS Scorecard and PCSB PMF.	The SEA should stay focused on the metrics that wrap into the AMOs.	Remove Parent-based accountability from waiver based on current conversations around the state-wide accountability model being created for the AMOs.
38, 43	Inclusion of science results in 2013	Informative data has never been provided to schools related to the science assessment and the science assessment itself may not be aligned to common core standards by 2013.	Remove or delay until one year after the first year of implementing a redesigned science assessment (2014 if first administration is 2013)
39, 43	Inclusion of composition results in 2012	Typo (confirmed on page 43)	Change to 2013 (since 2012 is first administration of newly aligned assessment)
43	School readiness	Statement in text that "school readiness assessments for lower grade students" could be added is too vague and not something we should sign off on without more specifics-- which students? Who develops? across the range of domains or simply cognitive measures?	Remove from waiver application
44	AMOs will include race/ethnicity groups that are outdated	The 5 original categories do not align to current ED requirements for data collection	Change to seven categories

44	A new growth model will be developed that is not zero-sum and implemented with the rest of the AMOs, but there is not a vertically scaled assessment	Unclear when this will be implemented and how much time will be required to develop it considering it would require a vertically scaled assessment	Can we use the existing model and anchor changes to the prior year's distribution?
44	The growth AMO will be based on reducing by half the percent of students not growing in 2010-11, but the 2010-11 estimates are not reliable at the student level	How can we adopt a new model when targets are based on an old model?	To be considered when determining the Accountability Index
46-57	School related interventions	Ensuring that the LEA is held accountable to implementing interventions	See appendix
Varied, e.g. 57	Ambiguity about role, training, oversight role of school review teams for early childhood programming.	It is unclear whether OSSE school review teams would also monitor ECE. Given that ECE is not included, it is suggested that it be clarified that this is relevant for K-12.	Suggest waiver specify that changes are K-12 throughout.
66	"To allow maximum LEA flexibility for non Race to the Top participating LEAs"	Where possible the Waiver should allow flexibility to all LEAs given that the waiver will last longer than the RTTT requirements.	Remove from waiver application
66	"and to ensure alignment between teacher and leader evaluation systems and common core standards"	DCPS does not believe we need to explicitly assess the Common Core State Standards through our evaluation system. Clearly, we want to support the use of CCSS through all that we do,	Remove from waiver application

		<p>but I would not want requirements around assessing use of CCSS explicitly.</p>	
66	<p>Ensuring validity of measures</p>	<p>Although DCPS agrees with ensuring that our measures are valid, we believe it is overly burdensome to ask each LEA to analyze whether their student achievement measures are positively related to other components of the evaluation system. Most LEA's will not have the capacity to do this on their own.</p>	<p>Remove from waiver application</p>
66-67	<p>"Student growth for all teachers. OSSE will require that LEAs include a measure of student growth as a significant component of all teacher and principal evaluations. OSSE will require that LEAs use standardized measures where they are available, but will otherwise grant LEAs flexibility to propose their own assessments"</p>	<p>The words "all" in the phrase student growth for teachers is too strong as there are some teachers who will not have a student growth measure. In addition, "significant" is arbitrary and the requirement to use standardized measures where they are available is a too restrictive given that sometimes more than one year of a pilot of an assessment may be required prior to adding it into a student growth model.</p>	<p>"Student growth for teachers. OSSE will require that LEAs include a measure of student growth as a component of all teacher and principal evaluations. OSSE will require that LEAs use standardized measures where they are available, but will otherwise grant LEAs flexibility to propose their own assessments"</p>
67	<p>"Alignment with common core. OSSE will encourage LEAs to consider how their evaluation systems ensure</p>	<p>DCPS does not believe we need to explicitly assess the Common Core State Standards through</p>	<p>Remove from waiver application</p>

	that the skills and content that are being taught meets or exceeds common core standards.”	our evaluation system. Clearly, we want to support the use of CCSS through all that we do, but I would not want requirements around assessing use of CCSS explicitly.	
68	“OSSE will also create two new advisory groups – a group of teachers and a group of leaders from both public charter and DC public schools – that will provide input on the evaluation requirements and development of Teacher, Leader, and Professional Development standards. These groups will meet to review drafts of these documents and provide feedback. They will reconvene any time major modifications to the documents are proposed.”	Given that LEAs are required to collect feedback from teachers and school leaders (p.67) , it will be confusing to have this function also exist at the SEA level and the LEA level. DCPS suggests that the process exist at the LEA level so that the feedback is more explicit and direct.	Remove from waiver application
68	“Finally, OSSE will require the submission of individual teacher and leader ratings from all LEAs through the Employed Educator Report. Individual ratings will not be published in any way, but will be used to track progress in improving teacher effectiveness and to respond to federal reporting requirements, Ratings will only be published in aggregate form. Moreover, OSSE will	In this section, OSSE reiterates that LEAs will need to turn over data, including individual teacher and principal data. Given that each LEA has a different evaluation system, the data is not comparable and should not be reported in an aggregate form.	Remove from waiver application

	disseminate a data policy this spring that indicates that OSSE will not report individual teacher data”		
Thoroughly	Student growth is defined as being 50% value-added for teachers who teach in the tested grades.	The waiver should make the requirements more broad, not limit us to the RTTT agreement. We want the freedom to change this metric and the weights in the future.	We should only keep this in the places where we are referencing what the RTTT application says. We should make clear that the waiver requirement is: A significant portion of a teacher’s evaluation will be student achievement. LEA’s will identify appropriate assessments and goals for this portion.
69	“The component must include the common teacher value added measure”	Reads as if there is a teacher value added measure that is different from the student growth measure previously mentioned	“The component must include the common student achievement measure”

Appendix to DCPS Feedback

Overall DCPS is concerned that with the transition to PARCC that we are establishing targets on the DC CAS and will then be shifting to a new assessment. It is extremely important that OSSE commit to creating a transparent crosswalk of how DC CAS translates to the PARCC that can be understood across the district given the importance of the growth AMOs.

p 17

Principle 2a:

Language to ADD:

The Office of the State Superintendent of Education (OSSE) does not currently implement a state-level accountability system in addition to Adequate Yearly Progress Reports. Instead, the Public Charter School Board (PCSB), the chartering authority with oversight over 53 of the 54 Local Education Agencies by law, has created and implemented an accountability system for monitoring its schools. DC Public Schools has created a parallel accountability system for monitoring schools developed by the Office of School Turnaround (formerly the Office of School Performance and Restructuring). Therefore, OSSE will continue to partner with the PCSB and DCPS and will use the PCSB Performance Management Framework and the DCPS Scorecard as a component of its statewide accountability system for differentiated accountability and supports.

** Italics indicates that the original language came from the PCSB feedback.*

p.34

DC Public Schools Accountability

DC Public Schools plans to hold its' schools accountable using the newly released DCPS Scorecard. The purpose of the Scorecard is to give parents, students and community members in the District of Columbia a clear, objective picture of school performance. By incorporating multiple measures of school quality into one tool, the Scorecard presents a unique opportunity to compare schools' strengths and weaknesses across DC Public Schools. If DC receives the ESEA waiver, the Scorecards will also include the state level Accountability Index described in the waiver application. The metrics within the Scorecard are aligned to the DC Public Schools Effective Schools Framework and address five areas of school effectiveness: Student Performance, Student Progress, Safe and Effective Schools, Community Engagement and Satisfaction and Unique School Indicators. With a few exceptions, data are displayed for two prior school years so school performance can be tracked over time. District averages for similar schools are displayed when available. Below is a brief description of the key components of the DCPS Scorecard.

Student Performance

1200 First St, NE | Washington, DC 20002 | T 202.442.5885 | F 202.442.5026 | www.k12.dc.us

This measure is also on the PCSB PMF (Student Achievement)

Results of annual, standardized assessments don't describe the full school experience, but they do provide the most accurate and reliable signal of student performance. Every DCPS school should demonstrate progress in the core areas of math and reading, as well as cultivate students and faculty focused on improving performance through outstanding teaching and learning. The following measures are included as part of the DCPS Student Performance Measure:

- **Meeting or exceeding math/reading standards:** The percentage of students meeting or exceeding state standards by earning scores of Proficient or Advanced on the District of Columbia's Comprehensive Assessment System (DC CAS or DC CAS Alt).
- **Exceeding math/reading standards:** The percentage of students performing at the highest level, Advanced, on the District of Columbia's Comprehensive Assessment System (DC CAS or DC CAS Alt).
- **Median math/reading performance level:** The median student's performance on the continuum of Advanced, Proficient, Basic and Below Basic performance levels on the District of Columbia's Comprehensive Assessment System (DC CAS or DC CAS Alt). This performance level is for the median (or middle) student, meaning that among other students in the school, half score above and half score below this point. If the median is at the high end of Basic, for example, the school is closer to having all students meeting standards (Proficient) than if the median is at the low end of Basic.
- **Student engagement:** A score that signals students' level of effort and interest in their classes, as well as students' confidence in their own educational success. The scale is from 0 to 100, and the score is based on the results of a student survey given every two years.
- **Retention of Effective and Highly Effective Teachers:** The percentage of teachers rated Effective or Highly Effective by DC Public Schools' previous year IMPACT evaluation system who are returning to this school from the previous year.

Student Progress

This measure is also on the PCSB PMF.

Compared to student performance, which signals the share of students achieving at various levels, student progress is a measure of how much students grow from year to year. While some schools may have relatively few students meeting or exceeding state standards, it is important to gauge the extent to which those schools help students catch up.

- **Student growth in math/reading:** The median student's growth on the District of Columbia's Comprehensive Assessment System (DC CAS). This score describes the percentage of students the median (middle) student outperforms who started with a similar level of prior achievement. For example, a score of 70 means that this school's median student outperformed more than 70 percent of students in the District with the same level of prior achievement.

Safe and Effective Schools

This measure is also on the PMF (Leading Indicators).

DCPS believes that all schools must provide caring and supportive environments. School environments that are safe and welcoming better enable students and staff to learn and teach.

- **Student Attendance:** The average percentage of students a 2011 attending school daily.
- **School Safety:** A score that represents student, parent and staff perceptions of safety and order at this school. The scale is from 0 to 100, and the score is based on the results of a stakeholder survey given every two years.
- **Expulsions and Suspensions:** The percentage of students who were expelled or suspended for 11 days or more.
- **Student Re-enrollment:** The percentage of students who returned to school the following year. This does not include students in the school's highest grade level.

Family and Community Engagement and Satisfaction

1200 First St, NE | Washington, DC 20002 | T 202.442.5885 | F 202.442.5026 | www.k12.dc.us

Families and community members play key roles in helping students and schools thrive. When parents, guardians and family members feel respected and informed about their student's life at school, they are more likely to be involved in helping their child learn.

- **Community Satisfaction:** A score that represents overall student, parent and staff satisfaction with this school. The scale is from 0 to 100, and the score is based on the results of a stakeholder survey given every two years.
- **Parent Engagement:** A score that represents how well and how often parents felt this school engaged and communicated with them. The scale is from 0 to 100, and the score is based on the results of a parent survey given every two years.

Principle 2b—AMOs

[To Come]

Principle 2.ci—Priority Schools

Monitoring DC Public Schools

IMPLEMENTATION: For schools identified as Priority under the state-level Accountability Index, DCPS will implement one of the following interventions for each of these schools:

- **Revise and Continue to Implement Cohort II Plans.** For schools previously in Focus status, the first phase of the intervention is to review and evaluate the intervention plan established in the previous phase. The plan should be updated to learn from the strategies that were not successful in the prior plan in order to create a more strategic approach to improving the schools performance. School must identify reasons for failing to meet AMOs and research based improvement.

OR

1200 First St, NE | Washington, DC 20002 | T 202.442.5885 | F 202.442.5026 | www.k12.dc.us

- **School Develops and Implements Turnaround-specific Action Plan.** School is required to develop a turnaround specific action plan. (May be one of the schools selected for Race to the Top Turnaround Leadership Model).

AND

- **Office of School Turnaround determines alternative governance structure.** DCPS would consider one of the following governance structures: charter school partnership, limited contract with an outside provider, hybrid structure of teacher, administrator, community and central office staff (MOU), replace all or most school staff relevant to AMO failure, state takeover or other major restructuring.

OR

- **Consider school closure.** DC Public Schools would consider school closure for a school that remains in priority status for an extended period of time without showing any growth.

AND

- **Professional Development.** Mandatory professional development around best practices in school turnaround for all staff.

Note: *Any intervention being required for Focus or Continuous Improvement Schools may also be applied to Priority Schools.*

PROGRESS MONITORING: The Office of School Turnaround would monitor the progress of Priority schools. For schools in priority status, the specialist assigned to the school from the Office of School Turnaround would work with the Instructional Superintendent and the principal to support the development of a plan, determine the appropriate mid year and end of year targets. Schools would be able to use the data on the School Performance Dashboard Initiative (SPDI) – online web tool to track their on going progress. Schools in priority status will have the least amount of flexibility in spending of any federal funds that the school is eligible to receive.

2.C.ii—Focus Schools

For schools in Focus status, DC Public Schools believes that it is important to tier these schools into two different categories: Cohort I

and Cohort II. The schools in Cohort II will be the schools that are in danger of entering priority status whereas the schools in Cohort I will have more flexibility.

IMPLEMENTATION: For schools identified as Focus the following interventions will be applied:

Cohort I

- **Maintain and Enhance Continuous Improvement School Activities** Develop and implement a plan to improve school's success in their Comprehensive School Plan. School must identify reasons for failing to meet AMOs and research based improvement.
- **Maximize Instructional Time.** Examine and reorganize school schedule to provide options for increased learning time during the school day.
- **Professional Development.** Mandatory professional development around best practices in school turnaround for all staff.

Cohort II

- **Cohort I Plan.** Revise and re-evaluate Cohort I plan (Comprehensive School Plan) to learn from successes and failures of prior implementation. Develop and implement a more strategic and aggressive implementation plan. School must identify reasons for failing to meet AMOs and research based improvement.
- **Funding.** Allocate local school funding for the implementation of extended day learning opportunities.
- **Staffing.** Consider replacing relevant school staff.
- **Autonomy.** Decrease school autonomy and increase district oversight, DCPS selects a turnaround model.
- **Professional Development.** Mandatory professional development around best practices in school turnaround for all staff.

Note: Any intervention being required for Continuous Improvement Schools may also be applied to Focus schools.

MONITORING: The Office of School Turnaround would monitor the progress of Focus schools. For schools in focus status, the specialist assigned to the school from the Office of School Turnaround would work with the Instructional Superintendent and the principal to support the development of the plan, determine the appropriate mid year and end of year targets. Schools would be able to use the data on the School Performance Dashboard Initiative (SPDI) to track their on going progress.

Continuous Improvement School (Good Standing Schools – PCSB)

*Note that as LEA, DCPS still requires prescriptive interventions for schools that have not yet reached Rewards Status.

IMPLEMENTATION: For schools identified as Continuous Improvement under the Accountability Index, DCPS will implement one of the following interventions for each of these schools:

- **Develop and Implement an Improvement Plan.** School must develop a two year improvement plan. School must identify reasons for failing to meet AMOs and research based improvement practices.
- **Professional Development and Collaboration.** School will be required to create more time for teacher collaboration and professional development.
- **School Leadership Requirements.** School leadership is required to attend mandatory professional development around data interpretation analysis, root cause analysis, and implications for instruction.

PROGRESS MONITORING: The Office of School Turnaround would monitor the progress of plans. For schools in continuous improvement status, the specialist assigned to the school from the Office of School Turnaround would work with the Instructional Superintendent and the principal to support the development of a plan, determine the appropriate mid year and end of year targets. Schools would be able to use the data on the School Performance Dashboard Initiative (SPDI) online dashboard to track their on going progress.

Principle 2.c.iii—Reward Schools

ATTACHMENT 3



Office of the



State Superintendent of Education

RETHINKING AND REDEFINING THE ELEMENTARY AND SECONDARY EDUCATION ACT (No Child Left Behind)

for District of Columbia Public and Public Charter Schools

Focus Group and Community Meeting Feedback

OVERVIEW: The Office of the State Superintendent of Education (OSSE) conducted extensive outreach in order to meaningfully engage and solicit input on its ESEA Flexibility Waiver application. OSSE sought to gather early input from critical and diverse education stakeholders in the District of Columbia by providing opportunities for stakeholders to readily access information on the ESEA flexibility option and by soliciting public input via a variety of media. The outreach plan centered on a commitment to keeping the District's education community informed of and involved in the consideration and development of the ESEA Flexibility waiver application in order to ensure that the needs and concerns of District's public education stakeholders were addressed. A parallel goal of outreach and consultation efforts was to create or fortify partnerships with individuals and groups that will implement, support, develop or be impacted by the educational strategies identified in the application.

STRATEGIES: In addition to inviting public comment via the agency's website and at town hall meetings, OSSE ensured that select stakeholders impacted by the District's education program had opportunities to participate in smaller focus groups where unique needs and perspectives were discussed. To meet these objectives, the SEA worked to identify and leverage existing opportunities for seeking input. Accordingly, OSSE consulted with existing advisory groups, such as the DC Council, the State Board of Education, the State Committee of Practitioners, the Youth Advisory Council, Advisory Neighborhood Commissions (ANC), DC Teachers Union, the Human Capitol Task Force, the Student Growth Measure Task Force, the Common Core Task Force and the District's accountability peer review team. Participants included experts or advocates representing specific wards (geographical regions) and unique groups inclusive of homeless families, charter schools, delinquent students, faith based organizations, parents, students, teachers, LEA administrators, community based organizations, institutes of higher learning, special education experts, local businesses, community liaisons, and English language learners.

While initial efforts to seek input for the waiver application from the larger community focused on town hall meetings, the SEA strategy was subsequently revised to ensure that appropriate forums and media were utilized for each critical stakeholder group. As a result, focus groups were scheduled in various settings across the District in order to eliminate geographical, economical or temporal barriers. OSSE worked collaboratively with elected bodies including the State Board of Education, the DC City Council, and neighborhood associations to solicit public input through stakeholder roundtables, online video



Office of the State Superintendent of Education

informational interviews, in-person meetings, and through our online public comment space.

Communications regarding the ESEA Flexibility Waiver application were disseminated to the public via a number of media including press releases, social media (i.e. Facebook, Twitter (600+ tweets)), email blasts, and extended Open House/Office Hours. Participants were able to participate by phone, written or electronic mail, webinar, teleconference, or in-person meetings. The following electronic materials were used to communicate information to the general public:

- Web – OSSE’s website provides up-to-date information on the application including a PowerPoint presentation, the draft application, and information regarding scheduled community and focus group meetings (accessed by 700+),
- E-newsletters – OSSE distributed newsletters via email to a growing list of more than 2200 contacts.
- Dedicated Email Account – OSSE established an email account to collect feedback from the public. More than 50 constituents or stakeholder groups have submitted comments by email. Respondents include community based organizations, the Archdiocese, the Public Charter School Board, Alternative Education Programs, LEA administrators, community based organizations and others.
- Print media – OSSE developed, published and distributed a FAQ document that was distributed to group participants and is published on the website.
- Video/Public Service Announcements- Informational videos have been posted on YouTube video and an informational English and Spanish message “ESEA: An Introduction” ran on Cable Access Channel 16. on the public access channel

In summary, more than 50 meetings, town halls or focus groups were held with stakeholders to discuss reforms related to the Flexibility request. Once a draft application was prepared, a 28 day open comment period began and comments were accepted until February 14, 2012.

The strategy of holding focus groups representing unique stakeholder communities produced critical feedback. Participants received an overview of the ESEA flexibility waiver option and were advised that focus group results would be used to inform the application process. To facilitate and guide discussion, open-ended questions that became increasingly specific were asked by SEA facilitators. Participants were encouraged to share opinions, concerns, priorities and perspectives relevant to the group and to the four principles of the ESEA waiver. Discussions addressed how proposed reforms might change the future of DC public education. Finally, information was given regarding additional opportunities for participants to provide further input. In addition to the critical input shared below, focus group outcomes include a shared understanding of ESEA flexibility options, timeline and process and of how the reform-like changes described in our application will change the future of DC public education.



Additional Outreach: OSSE efforts to engage and garner robust discussion regarding the proposed plan will continue in the coming week. Specifically, OSSE will seek added input at Advisory Neighborhood Commissions in various wards, provide regular Tweets© to update the public, and will continue to make ESEA waiver information readily available through press releases, media alerts, and OSSE web updates. OSSE has and will continue to provide ESEA Waiver resources to the public, including a Waiver Overview, Frequently Asked Questions, Focus Group Schedules, and the draft application. Outreach efforts will culminate with an open comment period which will close on February 7, 2012. Members of the Mayor's Transitions team suggested that the SEA partner with local universities to develop training programs that provided both subject area expertise and the skills needed to meet the needs of a high poverty urban student population

The following summary is not exhaustive but captures some of the most common input received across focus groups.

PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

There was support for this requirement across groups. Community advocates, Youth Advisory Council (YAC), the Committee of Practitioners (COP) and LEA participants emphasized the importance of including these expectations at the elementary level. Several participants requested reporting, resources and supports to address dropout, attendance, and college preparation from preschool through graduation. The importance of early identification and intervention for various learning disorders (i.e. undetected vision related learning disorders) was articulated.

Parents wanted information on the implementation of common core standards, particularly in early elementary programs and the state role will be in ensuring that schools are able to unpack and implement these new standards. Participants suggested that the SEA partner with local universities to develop training programs that provided both subject area expertise and the skills needed to meet the needs of a high poverty urban student population. Stakeholders expressed a desire for information that demonstrates the extent to which students will be nationally and internationally competitive. Special education advocates stressed the importance of building a coordinated outcome-based transition program to promote the successful transitions of special needs students to the community. Parents encouraged the SEA to empower parents by providing teaching and training from pre-kindergarten through graduation.

Several stakeholders stressed the importance of a well rounded education that includes universal music education, before and after school services in high need schools, equitable opportunities (i.e. gifted and talented programs) in all wards, and emphasis on physical



education and health.

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

Resetting AMOs- Focus groups generally agreed that current AYP targets had become unreachable and were no longer meaningful for the majority of District schools given that more than 90% of tested schools are projected to be in improvement or restructuring by FY13 under the current accountability model. Informal polls showed a preference for setting annual targets to reduce achievement gaps by 50% in six years. Several groups indicated that provisions would need to be developed for unique groups such as students with special needs or who are English language learners.

Differentiated Recognition and Accountability: Groups generally agreed that that 1) an index rating system with multiple indicators would provide more meaningful data, 2) the present accountability model does not accurately document school effectiveness and 3) that growth measures need to be incorporated into the accountability system. Although there was general consensus that multiple indicators would more accurately assess school effectiveness, many stakeholders expressed concern that identifying data sets that were common across LEAs would be very challenging and overly burdensome for the District. Several charter school advocates expressly opposed State imposed measures that would create added burdens to for LEAs and encouraged the working groups to leverage work completed during the development of the Public Charter Schools Board' Performance Management Framework (PMF) and the DC Public Schools' Scorecard.

Stakeholders advocated the development of unique measures for special education and English Language Learners (ELLs) and asked that OSSE work towards developing growth models for these unique student groups.

Growth Measures: Some participants felt growth measures were appropriate but that LEAs should be provided with flexibility in defining student growth, given that LEAs have unique assessments and suggested that where possible, OSSE could define and require LEAs to use "standardized assessments." Conversely, several parents and community advocates asked that the plan address the need to provide stakeholders with transparent, meaningful and *comparable* data for all LEAs. Stakeholders discussed the need to consider if a single model would meet the needs of schools with specialized purposes (i.e. special education, alternative education, adult education etc.)

Other Measures: Although some charter school advocates preferred an accountability system that did not extend beyond federally mandated elements, other stakeholders felt that items that reflect the capacity of District students to be nationally and internationally competitive (i.e. composition, science, technology etc) should be included in the



Office of the State Superintendent of Education

accountability plan. Most groups agreed on the importance of setting reasonable, attainable goals but expressed strong concern about the implied message of setting differentiated goals for schools or subgroups of students. The Youth Advisory Council expressed concern that differentiated targets would be interpreted as an indication of inferiority and that students, teachers and administrators would not feel compelled to strive for achievement beyond that articulated in the accountability model.

Stakeholders also sought recognition of non-academic factors known to impact student achievement and advancement. Related discussions centered on phasing in indicators deemed critical but for which clear measurements are not available. The importance of parental and community involvement was discussed in several groups. YAC, community advocates and parent members of the Parental Information Resource Center (PIRC) training program requested school climate indicators that address issues of safety, truancy and appropriate student/staff behavior. YAC, community activists and teacher groups indicated that teacher retention should be incorporated as an important measure. There were concerns about developing these and other measures of non-academic indicators (i.e. suspensions, expulsions, re-enrollment) and the potential burden on LEAs to develop new data collection and reporting strategies.

COP members suggested that the accountability model include available measures such as SAT[®], PSAT [®] tests, ACT[®]; Advanced Placement [®] results, International Baccalaureate outcomes, etc. LEA and charter school participants strongly advocated leveraging work done by DCPS and the Public Charter School Board in developing LEA level scorecards and (??). There was general agreement that science should be included in the accountability model at some point but strong concern about the District's present current capacity to do so.

Parental Engagement: Parents and community advocates asked that the plan address the need to provide stakeholders with transparent, meaningful and comparable data for all LEAs. Several participants noted that the currently accountability model did not assess effectiveness of Prekindergarten through second grade and included only one high school grade. Concerns were expressed about implementing accountability measures that did not reflect inequities related to unique challenges, school level funding, school supports, and other resources at each public school.

Ward liaisons asked for increased transparency regarding the amount of local funding directly provided to each school. YAC members cited differences in resources such as mentoring and internship opportunities that were not currently reported in state level reports. In general, there was a call for high quality reporting that provides comparable and meaningful data to parents. Across the District, stakeholders asked that OSSE set high expectations for LEAs to actively engage parents and community members in the education process.



Support and Interventions: Parent and community representatives advocated the inclusion of information regarding the distribution and availability of support and resources for schools that would not be identified as priority or focus schools. Community advocates strongly expressed concern about how the District could ensure that resources reached neediest school once federal funds were disbursed to LEAs. Private school representatives expressed concern about the implication of continuing services for eligible students attending private schools.

Committee of Practitioners (COP) members expressed the importance of establishing a common understanding that all schools strive to meet common core standards. LEA administrators, COP members and Youth Advisory Council members (YAC) expressed concern regarding the absence of curricula aligned to common core standards. Charter school advocates stressed the importance of adhering to autonomy guidelines established by the DC Charter School Act as it relates to curricula.

YAC members and Ward community wanted performances measures that recognize inequities aligned to the unique challenges, funding levels, and school supports at the school level. Several groups identified the need for supports for professional development, classroom management and social challenges relevant to urban high poverty communities. COP members sought endorsement from the SEA for LEA to LEA mentorship, increased opportunities to share best practices, and support in preparing for assessment based on common core standards.

Wards 7 and 8 parents called for greater clarity regarding the role of OSSE in monitoring and enforcing the implementation of federal requirements at local schools. Parents called for clear statements about objectives, outcomes and timelines. This information was seen as a catalyst for the empowerment of parents and as a critical component of partnerships between the SEA and the community.

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

There were multiple concerns about the development of this portion of the application. Teachers expressed concern about evaluations based on assessments that are not aligned to schools' curricula and that do not incorporate critical barriers such as chronic truancy. Some teachers suggested phasing in assessments as PARCC objectives are achieved. Advocacy groups felt that while there has been tremendous focus on hiring teachers with subject area expertise, there has been little attention given the unique needs of a high poverty urban district and the skills that effective teachers need to succeed.



Office of the



State Superintendent of Education

Teachers expressed concerns that growth measures may not capture growth for students whose performance falls several grades below actual grade level. Teachers also expressed concern about including growth measures for all grades and subjects in teacher evaluations when there are no valid or objective means of assessing performance in these subjects and grades. Options such as end-of-year tests, a portfolio of several assessments and external assessments (ex: ACT/SAT for high school) were discussed as options. It was suggested that growth measures be very lightly weighted in teacher evaluations given that given that assessments for non-tested grades will be of questionable quality and validity. Teacher union representatives suggest that assistant principals and possibly lead teachers be included in the teacher and leader evaluation requirements as crucial members of the leadership team. New Leaders, Inc. emphasized the importance of leadership developed aligned to District education goals.

PRINCIPLE 4: REDUCING DUPLICATION AND UNNECESSARY BURDEN

In considering differentiated measures of accountability, members asked for diligence in ensuring that duplicative and burdensome reporting requirements that have little or no impact on student outcomes be avoided. Some did not want to see additional measures added to the system for the purpose of having additional indicators. There were concerns about developing measures of non-academic indicators (i.e. suspensions, expulsions, re-enrollment) and the potential burden on LEAs to develop new data collection and reporting strategies. Stakeholders asked that the OSSE data system be used to reduce the administrative burden on LEAs in capturing information for students who did not complete the formal transfer process but have transferred to District, Maryland or Virginia schools.

As previously noted, although there was general consensus that multiple indicators would more accurately assess school effectiveness, many stakeholders expressed concern that identifying data sets that were common across LEAs would be very challenging and overly burdensome for the District. Several charter school advocates expressly opposed State imposed measures that would create added burdens to for LEAs and violate the autonomy granted to charter schools under local law.

General Comments: Parents and others expressed support for many of the proposed elements of the waiver application. Increased and regular communication coming directly from OSSE was identified as a critical step in building partnerships and in establishing trust with the community. Wards 7 and 8 parents called for greater clarity regarding the role of OSSE in monitoring and enforcing the implementation of federal requirements at local schools.



Office of the



State Superintendent of Education

Schedule of Focus Group and Community Meetings:

Focus Group/Community Meeting	Date
Public Charter School Board	11/4/2011
DC Public Charter School Board	11/7/2011
DC Council Chairman Kwame Brown	11/8/2011
DC Public Schools	11/8/2011
Race to the Top Student Growth Task Force	11/8/2011
DC CAS Technical Advisory Committee	11/15/2011
DC State Title I Committee of Practitioners	11/17/2011
Friends of Choice in Urban Schools (FOCUS)	11/21/2011
Workforce Investment Council (WIC)	12/5/2011
Race to the Top Student Growth Task Force	12/6/2011
DC State Board of Education	12/7/2011
DC State Title I Committee of Practitioners	12/8/2011
Mayor's Office of Community Relations and Services- Outreach Specialist (8 Wards)	12/8/2011
Parent Information Resource Center	12/8/2011
DC Public Charter School Board	12/9/2011
DC Association of Chartered Public Schools	12/13/2011
Youth Advisory Council	12/13/2011
Teacher Focus Group	12/13/2011
State Board of Education Public Meeting	12/14/2011
DC Council	12/15/2011
Race to the Top Human Capital Task Force	12/15/2011
Members of the Mayor's Transition Team - Education Committee	12/19/2011
Friends of Choice in Urban Schools (FOCUS)	12/20/2011
Public Charter School Board	1/4/2012
Washington Teachers Union and Council of School Officers (WTU/CSO) Meeting	1/5/2012
LEA Leaders	1/5/2012
Organizations for English Learners	1/6/2012
LFA Leaders	1/9/2012
Race to the Top Student Growth Task Force	1/10/2012
Miner PTA Meeting (Ward 6)	1/11/2012



Office of the



State Superintendent of Education

Institutes of Higher Learning	1/12/2012
Ward 8 Community Meeting	1/13/2012
Special Education Target Group (webinar)	1/17/2012
Ward 5 Council on Education	1/17/2012
CHIPSCO	1/17/2012
Institutes of Higher Learning	1/18/2012
LEA Leaders	1/18/2012
ANC Leadership	1/18/2012
Ward 3 Democratic Committee	1/19/2012
21st Century Community Learnings Centers Sub-Recipients (Community Based Organizations and LEAs)	1/23/2012
Community Based Organizations (non subrecipients)	1/23/2012
Community meeting at Hendley Elementary School in Ward 8 with State Board of Education Member (and Hendley alum) Trayon White	1/31/2012
2F ANC	2/1/2012
Hearst PTA Meeting	2/1/2012
Palisades Citizen Association	2/7/2012
John Eaton Home & School Association (Ward 3)	2/7/2012
ANC 1A	2/8/2012
4C ANC	2/8/2012
Science Education Specialists	2/8/2012
Special Education Practitioners and Specialists	2/9/2012
Civil Rights Organizations	2/10/2012
Ward 7 Parent/Community Meeting	2/13/2012
School Administrators	2/13/2012
State Board of Education - Application Update	2/15/2012
Private Schools Serving Eligible Students	2/22/2012
4B ANC	2/27/2012
Wards 7 and 8 Parent/Community Meeting	2/21/2012



Office of the State Superintendent of Education

311 Online | District Residents | Businesses | Visitors | Media | Online Services

THE DISTRICT OF COLUMBIA
"One City, One Government, One Voice"

ONE CITY
Mayor **VINCENT C. GRAY**

Office of the State Superintendent of Education

Search Search

dc.gov osse.dc.gov

OSSE Home | Programs | News Room | Parents and Students | Educators | State Board of Education | About OSSE

SHARE

Elementary & Secondary Education Act Flexibility Waiver (Draft) Application

ESEA Flexibility Waiver

In February 2012, the Office of the State Superintendent of Education (OSSE) will submit a flexibility request regarding the implementation of the Elementary and Secondary Education Act (ESEA)—commonly known as No Child Left Behind—to the US Department of Education.

[Learn More](#)

1 2 3 4 5 6

Follow Us on Twitter: @OSSEDC



bturque Tommy Wells: "the vitality and possibility" of all DC neighborhoods linked to having quality elementary schools within walking distance.
10 minutes ago · reply · retweet · favorite

DCPrep Social Studies Teachers (7th and 8th)

Join the conversation

Popular Links

- CSP V-B Dissemination Grant & Program Planning Grant RFAs Now Available
- Adequate Yearly Progress
- Educator Licensure and Accreditation
- Assessment and Accountability
- Higher Education Financial Services
- Notice of Non-Discrimination
- Early Learning Challenge Application
- OSSE 2012 College Expo

Upcoming Events

- Feb 21** Ward 7 & 8 ESEA Waiver Application Meeting
- Feb 27** Community Presentation at 4B ANC Meeting: Elementary and Secondary Education Act
- Mar 10** 2012 Smart College Choice Expo

Note: The Twitter feed may load slowly when traffic is high.

more 99



Office of the
State Superintendent of Education

OSSE ESEA Flexibility Waiver Application: An Introduction

DCEducation Subscribe 2 videos ▾

Dr. Kayleen Irizarry, Asst. Superintendent
Elementary and Secondary Ed., OSSE

0:05 / 3:01

<http://www.youtube.com/watch?v=N3uJbBnE8xk>

810 First Street, NE, 9th floor, Washington, DC 20002
Phone: 202.727.6436 • Fax: 202.727.2019 • www.osse.dc.gov



Office of the State Superintendent of Education

311 Online | District Residents | Businesses | Visitors | Media | Online Services

THE DISTRICT OF COLUMBIA
"One City, One Government, One Voice"

DC CITY
Mayor **VINCENT C. BRAY**

Office of the State Superintendent of Education

Search Search

dc.gov ossse.dc.gov

O&SE Home | Programs | News Room | Parents and Students | Educators | State Board of Education | About OSSE

Agency information



Office of the State Superintendent of Education

Office Hours
Monday to Friday 9:30 am to 5:30 pm

How to Reach Us
310 1ST STREET NE, 9th Floor,
WASHINGTON, DC 20002
Phone: (202) 727-6436 TTY: 711

Ask the Superintendent
Agency Performance



State Superintendent Hosanna Waleley
State Superintendent of Education



ESEA Flexibility Waiver Application

Dear DC Education Community:

The Office of the State Superintendent of Education (OSSE) remains committed to setting high standards of achievement so that District students can succeed within and beyond the classroom.

Today marks a monumental step toward reaching that goal, as our agency makes final preparations for submitting an official waiver request to the US Department of Education for flexibility regarding the implementation of the Elementary and Secondary Education Act (ESEA) – most commonly known as No Child Left Behind.

Over the past several months, OSSE leadership has worked collaboratively with numerous area stakeholders including Local Education Agencies, Schools, Parents, Teachers, Community Members and other District residents committed to education. Because of their vital input, we have developed a waiver application that is meaningful, comprehensive and progressive in moving education forward in the District of Columbia.

The benefits of the ESEA flexibility waiver will revitalize our current accountability system and set higher standards and expectations for teaching and learning. The improved accountability system will allow OSSE, LEAs, and other education partners to target rewards and supports based on academic achievement and needs. And the flexibility in the use of federal funds will ensure greater success in student outcomes and teacher and leader effectiveness.

Our month-long public comment period begins today through February 14, 2012. Comments may be submitted by email to osse.comments@dc.gov. Available below for download is a draft copy of OSSE's ESEA Application and a FAQs brochure. I look forward to your continued input.

Sincerely,

Hosanna Waleley, State Superintendent of Education

Attachments

Attachment	Size
OSSE ESEA Flexibility Application (Draft)	2.1 MB
Community Meeting Schedule: OSSE ESEA Flexibility Application	191.84 KB
District Schools Seek to Leave Behind No Child Left Behind Law.pdf	172.96 KB
SB06-01-05-12.pdf	1.01 MB
ESEA FAQs 1.pdf	384.88 KB

Strong Start Campaign

If your child isn't walking, maybe you should take the next step.



Learn about the Strong Start Campaign

Go to College Now!

Go to College Now!

Let Higher Education Professionals Show You How



Get up to \$10,000 for college. Learn more

Community Building Often Starts with OSSE Dollars



Kidd Will Academy Gym, initial funding acquired through OSSE. Learn more

Join OSSE's Email List

Sign up now! for OSSE's email updates



Office of the



State Superintendent of Education

OSSE Review/January 2012

A Monthly Update from the Desk of State Superintendent Hosanna Mahaley

ESEA FLEXIBILITY WAIVER

Since January 2012, the Office of the State Superintendent of Education has made 8 community presentations regarding the Elementary and Secondary Education Act (ESEA), disseminating information to almost 300 District Residents and engaging thousands more online. Additional presentations are scheduled in the month of February, during which OSSE staff will provide information on the Elementary and Secondary Education Act and present information on flexibility requirements.

February meetings are listed below.

MEETING	LOCATION
February 7 th , 2012 – 6:30PM John Eaton Home & School Association Meeting	John Eaton Elementary School – Library 3301 Lowell St, NW
February 7 th , 2012 – 7:30PM Palisades Citizen Association	Palisades Recreation Center 5200 Sherrier Place, NW
February 8 th , 2012 – 7:00PM 1A ANC Meeting	Harriet Tubman Elementary School 3101 13 th St, NW
February 8 th , 2012 – 7:00PM 4C ANC Meeting	Peiworth Library 4200 Kansas Ave, NW
February 13 th , 2012 – 6:00PM Presentation at IDEA PCS	IDEA Public Charter School 1027 45 th St, NE
February 13 th , 2012 – 7:30PM 3-4G ANC Meeting	Chevy Chase Community Center 560T Connecticut Ave, NW

SPECIAL MESSAGE FROM STATE SUPERINTENDENT MAHALEY ON THE ESEA FLEXIBILITY WAIVER

The Office of the State Superintendent of Education (OSSE) remains committed to setting high standards of achievement so that District students can succeed within and beyond the classroom.

Over the past several months, OSSE leadership has worked collaboratively with numerous area stakeholders including Local Education Agencies, Schools, Parents, Teachers, Community Members and other District residents committed to education. Because of their vital input, we have developed an ESEA waiver application that is meaningful, comprehensive and progressive in moving education forward in the District of Columbia.

The benefits of the ESEA flexibility waiver will revitalize our current accountability system and set higher standards and expectations for teaching and learning. The improved accountability system will allow OSSE, LEAs,

Continued on page 2

DIVISION OF SPECIAL EDUCATION (DSE)

DSE is pleased to announce the launch of its special education quality review project with American Institutes for Research (AIR). The project will include a review of local, national, and international best practices in special education and the development of quality program indicators that can be used in the District. Stakeholder focus groups will begin in February, and DSE will be hosting an OSSE stakeholder "brown bag lunch" session on February 7, from 1-3 pm.

OSSE submitted its FFY 2010 IDEA Part B and Part C Annual Performance Reports (APRs) as required by the US Department of Education's Office of Special Education Programs by February 1, 2012. These reports will be reviewed by OSEP and finalized by April, 2012.

On January 25, 2012, DSE conducted a well-attended webinar on 504 compliance that will be posted for reference on its web site. OSSE will be developing a 504 FAQ and 504 toolkit with LEA stakeholders to support effective implementation of 504 requirements.