



District of Columbia
Office of the State Superintendent of Education

OSSE'S REPORT ON THE UNIFORM PER STUDENT FUNDING FORMULA

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Introduction

Section 112(a)(2) of the Uniform Per Student Funding Formula for Public Schools and Public Charter Schools Act of 1998 (UPSFF Act), effective March 26, 1999 (DC Law 12-207; DC Official Code § 38-2911(a)(2)), requires the Office of the State Superintendent of Education (OSSE) to submit, on behalf of the Mayor, a report to the Council of the District of Columbia every two years that reviews that UPSFF formula and includes recommendations for revisions to the formula. The Office of the Deputy Mayor for Education (DME), with support from OSSE and other Executive Office of the Mayor offices, has and continues to analyze and review the formula, including but not limited to, student academic outcomes, local education agency (LEA) needs, at-risk funding, English Language Learner (ELL) student needs, and overall fiscal impact.

Per DC Official Code § 38-2911(a)(1), OSSE convened a working group with representatives of DC Public Schools (DCPS), DC public charter schools, DC Public Charter School Board (PCSB), the public, and government representatives to solicit input and recommendations regarding revisions to the formula. The Final Report compiled by OSSE and DME with recommendations from the UPSFF Working Group members regarding revisions to the formula is presented below. This group met monthly from August 2020 to January 2021 and reviewed the 2020 UPSFF Study, which presents analysis of the students covered by the at-risk weight, the consideration of school-level at-risk concentration funding, the structure of the ELL weight, and the cost drivers of the formula's foundation level. The working group also considered schools' foundational funding needs and discussed the group's recommendations in the context of the economic and social impacts of the coronavirus (COVID-19) global public health crisis.

Description of the 2020 UPSFF Working Group

OSSE convened a Uniform Per Student Funding Formula Working Group ("working group") pursuant to DC Official Code § 38-2911(a)(2), and staff members from DME and OSSE facilitated the sessions. The members of this group included representatives from DCPS, public charter schools, the public, and government representatives who provided input and recommendations regarding revisions to the formula.

The working group's membership included a variety of vantage points to best provide robust context to the group's discussions and, ultimately, this report. The working group was jointly facilitated by DME and OSSE staff. DCPS' representatives were from the Office of Resource Strategy, including those focused on school funding and budget strategy, and from the Office of Teaching and Learning focused on ELLs. From the public charter sector, representatives from E.L. Haynes PCS, KIPP DC PCS, Appletree PCS, Thurgood Marshall Academy PCS, Friendship PCS, and Capital City PCS were present. Government representatives included those from the Office of Budget and Performance Management (OBPM), the DC Public Charter School Board (DC PCSB), the Office of the Chief Financial Officer (OCFO), and DME. Other advocacy and local research individuals and groups focused on education funding participated including the DC Policy Center, DC Charter School Alliance, Senior High Alliance of Parents, Principals and Educators (SHAPPE), the DC Fiscal Policy Institute, and EdOps. Working group members are listed in Appendix A.

All meetings for this 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:

- Thursday, Aug. 20, 3-5 p.m.
- Thursday, Sept. 10, 3-5 p.m.
- Thursday, Oct. 8, 3-5 p.m.
- Thursday, Nov. 5, 3-5 p.m.
- Thursday, Dec. 3, 3-5 p.m.
- Thursday, Dec. 17, 3-5 p.m.
- Thursday, Jan. 7, 3:30-4:30pm

Topics for the Working Group's consideration focused on the 2020 UPSFF Study of four key components of the funding formula, including analysis of the students included in the at-risk weight, the consideration of school-level at-risk concentration funding, the structure of the ELL weight, and the cost drivers of the formula's foundation level.

Membership, meeting notices, presentations and notes for these meetings are available on the OSSE website.¹

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, effective March 26, 1999 (DC Law 12-207; DC Official Code § 38- 2901 et seq.), and is intended to be the mechanism to provide local funding for students in all LEAs. The funding formula is based on enrollment and sets forth a minimum foundational level required to adequately fund education; for the 2020-21 school year (fiscal year 2021, or FY21) the foundation level is \$11,310. The UPSFF allocates local funds only, but formula deliberations have taken into account levels of federal funding and other revenues that support public education in Washington, DC.

The formula also provides funding weights to support costs associated with:

- a. Grade levels;
- b. Students with disabilities;
- c. Limited English proficiency (LEP)/ELL;
- d. At-risk status; and
- e. Students in alternative, adult, and residential schools.

In addition to the foundational funding level and percentage add-ons for particular student characteristics, the formula also provides funding to cover facilities costs at public charter schools on a per pupil basis. For the 2020-21 school year the facilities allotment rate is \$3,408 for non-residential facilities and \$9,202 for residential facilities.

¹ osse.dc.gov/page/2020-21-uniform-student-funding-formula-upsff-working-group

Throughout the past 20 years, the funding formula has been periodically revised, with funding categories added or removed, and funding levels adjusted. The UPSFF rates are determined each annual budgeting process by using the current fiscal year's rates as a base and building upon that by considering a variety of factors. First, the prior year's foundation amount is considered. Next, the impact of expected cost increases, including DCPS personnel costs associated with union contracts and non-personnel DCPS costs like energy, are considered. Then, enrollment projection analysis is completed for both DCPS and the charter sector to determine the anticipated enrollment for each local education agency. Finally, revenue estimates from the OCFO's Office of Revenue Analysis (ORA) are also considered, along with the overall budget for the District government. This annual process has resulted in the foundation level increasing most fiscal years. The supplemental weights typically stay constant year to year, with moments of intentional change. Adjustments made to the UPSFF in the FY21 budget included a 3 percent increase to the foundation level from \$10,980 to \$11,310 per pupil.

2020 UPSFF Study Review

In 2019, the Deputy Mayor for Education sponsored the 2020 UPSFF Study.² This work was completed by Afton Partners, LLC during FY20, following Mayor Muriel Bowser's allocation and the Council of the District of Columbia's approval of funding for the study on four key components of the UPSFF: students covered by the at-risk weight, school-level at-risk concentration funding, the structure of the ELL weight, and the cost drivers of the formula's foundation level. A study was recommended by the 2018 UPSFF Working Group³ based on their review of the "The Cost of Student Achievement: Report of the DC Education Adequacy Study"⁴ conducted in 2013 ("2013 Adequacy Study"). The 2018 working group agreed that an entirely new comprehensive adequacy study was not necessary and instead recommended that it serve as a foundation for further study in several areas. A subset of the questions that the 2020 UPSFF Study was intended to address included⁵:

1. Should the UPSFF include a funding weight based on higher relative need for certain at-risk characteristics?
2. Should the UPSFF include a funding weight for school-level at-risk concentration (i.e. funding students in schools with a higher at-risk concentration more than students in schools with a lower concentration)?
3. Should the ELL weight be tiered, reflecting differing costs by service needs, and along what line of differentiation?
4. What are the actual cost drivers experienced by LEAs operating in the District of Columbia?

Along with other insights, the chapters of the 2020 UPSFF Study presented information on at-risk and ELL student funding levels over time, and student performance information on the Partnership for Assessment of Readiness for College and Careers (PARCC) Math and English tests and the World-Class Instructional

² dme.dc.gov/publication/2020-upsff-study

³ osse.dc.gov/page/2018-19-uniform-student-funding-formula-upsff-working-group

⁴ dme.dc.gov/page/dc-education-adequacy-study

⁵ dme.dc.gov/page/fy20-request-applications-2020-uniform-student-funding-formula-upsff-study

Design and Assessment (“WIDA”) ACCESS test;⁶ information on the enrollment changes of at-risk students and ELLs over time, and the differing needs of subgroups for each;⁷ information on the overlap between over-age students and students requiring special education services;⁸ uniform, high-level expenditure category information from DCPS and four participating charter school LEAs;⁹ and information on options for at-risk student subgroups and school-level at-risk concentration, as well as their associated cost estimate scenarios.¹⁰

2020 UPSFF Key Findings

The 2020 UPSFF Study analyzed student outcomes data and spending in DC, state and local practices from across the country, and feedback from an Advisory Group of local and national education experts to answer the questions posed in the Request for Applications (RFA). The following summarizes several key findings on student performance trends on the PARCC¹¹ Math and English tests and the WIDA ACCESS¹² language proficiency assessment presented in the study.

Performance Trends for Students Designated At-Risk for Academic Failure

Trends were analyzed from FY15, the first fiscal year budget that added an at-risk weight to the UPSFF, to FY19, the last year of data available prior to the publication of the study.

- Trend analyses on performance by *at-risk factor* showed that while student proficiency levels have improved over the past five years, the gap between at-risk and not-at-risk students widened. The gap was widest for students designated over-age in high school and students placed in foster care by the Child and Family Services Agency (“CFSA”).¹³
- Trend analyses on performance by *at-risk factor count* showed that students with more at-risk factors tended to have larger proficiency gaps compared to students with fewer or no at-risk factors.¹⁴
- Performance trends for students at-risk of academic failure were also analyzed at the school level. According to the 2020 UPSFF Study, student performance on Math and ELA PARCC tests align with concentration levels of students designated at-risk, but national research and recent

⁶ § 38–2911(b)(1); 2020 UPSFF Study Parts II, III, and IV; dme.dc.gov/publication/2020-upsff-study

⁷ § 38–2911(b)(2); 2020 UPSFF Study Parts II and IV; dme.dc.gov/publication/2020-upsff-study

⁸ § 38–2911(b)(3); 2020 UPSFF Study Part II; dme.dc.gov/publication/2020-upsff-study

⁹ § 38–2911(b)(4); 2020 UPSFF Study Part V; dme.dc.gov/publication/2020-upsff-study

¹⁰ § 38–2911(b)(5); 2020 UPSFF Study Parts II and III; dme.dc.gov/publication/2020-upsff-study

¹¹ osse.dc.gov/parcc

¹² osse.dc.gov/service/wida-access-ells-20

¹³ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-Risk Student Need, , p. 45 and Part VI: Appendix, p. 34, dme.dc.gov/publication/2020-upsff-study

¹⁴ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-Risk Student Need, p. 51 and part VI: Appendix, p. 35, dme.dc.gov/publication/2020-upsff-study

studies have been inconclusive on the impact of concentration funding on student outcomes.¹⁵

Performance for ELL

Trends were analyzed from FY17 to FY19. Within this time frame, the WIDA ACCESS test became more rigorous, resulting in more students keeping their ELL status longer and increasing the number of students designated as ELL in DC.¹⁶

- As measured by PARCC, ELL student outcomes improved markedly over the last three years, primarily driven by elementary school students at WIDA levels 3 and above.
- The achievement gap for all students with lower WIDA scores (below 3.0) and their non-ELL peers increased at each grade level band: elementary, middle, and high school grades.
- For secondary students, there was an overall increase in proficiency gaps from FY17 to FY19, with the most pronounced FY19 gaps in ELA for grades 6-10.
- Students identified as “new to the country” were identified as requiring significant additional supports through LEA interviews and Advisory Group meetings; however, limited performance data was available for this group of students.

2020 UPSFF Study Options

The 2020 UPSFF Study identified multiple options to update the ELL and at-risk weights, while also considering cost drivers for the foundation level. All UPSFF options were evaluated through the lens of student-based funding goals, including transparency, simplicity and impact on the students who need the most support. The following summarizes options to answer the research questions presented in the study.

- The study presented several options for better targeting segments of student populations designated at-risk that were particularly low-performing, included increasing funding for the over-age and/or CFSA funding categories, funding over-age interventions prior to high school, increasing funding for students with multiple at-risk characteristics, increasing the high school weight for all high school students, or creating a higher at-risk weight for high school students who are at-risk of academic failure.¹⁷
- The study presented several options for adding a school-level at-risk concentration weight to the UPSFF including a qualification level for at-risk funding which would establish a minimum at-risk threshold for at-risk funding and allocate all at-risk funding to schools above the minimum threshold, a tiered funding structure that would incrementally fund schools above a

¹⁵ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part III: At-risk Concentration, p. 4, dme.dc.gov/publication/2020-upsff-study

¹⁶ Results summarized from 2020 Uniform Per Student Funding Formula (UPSFF) Study Part IV: ELL Weight Structure, p. 48-53, dme.dc.gov/publication/2020-upsff-study

¹⁷ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-risk Student Need, p. 10, dme.dc.gov/publication/2020-upsff-study

certain threshold, emulating the Community Eligibility Provision¹⁸ for school food which would treat schools above a certain threshold as having 100 percent at-risk students, or a sliding scale that would add per pupil funding as school concentration levels increased.¹⁹

- The study presented several options to more effectively target funding for ELL students with the greatest need included “tiering” funding for ELL students based on grade level, targeting funding for students with lower WIDA ACCESS proficiency levels, additional funding for students designated as “new to the country” and/or SLIFE, or some combination of these options. The “tiered” funding options differentiate groups of students based on their grade band. Possible tiers are elementary, middle, and high school tiers; pre-K-8 and high school tiers; or K-5 and grades 6-12 tiers.²⁰
- The foundation spending analysis showed the DCPS and sample public charter schools studied spent \$22.4K per pupil in FY19, an increase of 4.1 percent on average from FY16 to FY19. The increases were driven primarily by personnel costs, representing 75 percent of total spending, including employees represented by a collective bargaining agreement, which reflect 91 percent of all DCPS employees.²¹

¹⁸ www.fns.usda.gov/cn/community-eligibility-provision

¹⁹ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part III: At-risk Concentration, p. 8, dme.dc.gov/publication/2020-upsff-study

²⁰ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part IV: ELL Weight Structure, p. 13, dme.dc.gov/publication/2020-upsff-study

²¹ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part V: Foundation Level Cost Drivers, p. 5, dme.dc.gov/publication/2020-upsff-study

Working Group Process for Prioritizing Funding Formula Adjustment Options

Following the 2018 working group recommendation to conduct a targeted UPSFF study focused on specific priority areas, the 2020 working group spent most of their time reviewing the 2020 UPSFF Study's findings and funding options. At each working group meeting from August 2020 through November 2020, members reviewed one of the four components examined in the 2020 UPSFF Study including at-risk student need, at-risk concentration funding, the ELL weight structure, and foundation level cost drivers. After review and discussion of funding formula adjustment options and student outcomes data presented in the 2020 UPSFF Study, DME and OSSE facilitators requested that working group members complete a survey in order to prioritize options presented in the study. The results from those preliminary surveys were presented and discussed at the meetings following survey administration. A final survey on all four components was conducted to assess the group's final recommendations and was discussed over two working group meetings in December. The working group also required an additional meeting outside of the originally scheduled meeting timeline to finalize the foundation level and at-risk recommendations in January. Several working group members encouraged the facilitation team to consider adding more time to the next working group's meeting series for further analysis review and finalization of working group recommendations.

The following describes the working group process for prioritizing funding options for each key component of the UPSFF examined in the 2020 UPSFF Study. Throughout this process, the working group acknowledged the impact of the COVID-19 public health crisis on student performance trends, as the study analysis used pre-pandemic data, and considered the economic impacts of the crisis when making recommendations for funding increases.

Funding Options for Students Designated At-risk

The 2020 working group reviewed multiple options to provide additional supports for sub-sets of at-risk students that have shown a higher relative need based on student outcomes from the 2020 UPSFF Study. Of these options, working group members demonstrated the most support for increasing funding to students with two or more (2+) risk factors, students who are over-age in high school, and students in the care of CFSA. The working group considered academic performance gaps, implementation concerns, number of students impacted, and the effects of the COVID-19 pandemic to prioritize funding increases for one or more of these sub-sets of at-risk students. Among sub-sets of students designated at-risk, students who are over-age in high school and students in the care of CFSA had the most significant performance gaps compared to both their at-risk and not-at-risk peers according to the 2020 UPSFF Study. Some working group members expressed concerns with the implementation of an additional supplemental weight for students in the care of CFSA and reasoned that data would be difficult to gather while maintaining student privacy. Many working group members supported an additional supplemental weight for students who are over-age in high school, but expressed concerns that this weight would not lead to a substantial funding increase for at-risk students due to the smaller number of students who qualify as over-age (5,654²² students in the 2+ category compared to 4,284²³ students in the over-age category according the 2020 UPSFF Study FY19 analysis) and that the funding increase would only impact high school students.

For these reasons, the majority of working group members favored adding an additional supplemental weight to the UPSFF for students with 2+ risk factors to increase funding for a larger group of students across all grade levels with minimal implementation concerns. Although an additional supplemental weight for students with 2+ risk factors would require the establishment of a definition for this sub-set, a longer implementation timeline was worthwhile to the group as they anticipated this sub-set of students to grow following the economic and social impacts of the COVID-19 public health crisis. Another reason given for favoring increased funding for students with multiple risk factors was the assumption that over-age students also experience multiple risk factors and would receive additional funding through this category. However, the study's FY19 analysis shows that 2,159²⁴ of the 4,284 over-age students in FY19²⁵, or about 50 percent, were only over-age and would therefore not benefit from funding based on multiple at-risk factors.

²² 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-risk Student Need, p. 21, dme.dc.gov/publication/2020-upsff-study

²³ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-risk Student Need, p. 11, dme.dc.gov/publication/2020-upsff-study

²⁴ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part VI: Appendix, p. 28, dme.dc.gov/publication/2020-upsff-study

²⁵ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-risk Student Need, p. 7, dme.dc.gov/publication/2020-upsff-study

Many working group members expressed interest in funding interventions to prevent students from becoming over-age prior to high school; however, a specific student population has not yet been defined for this group, and programs that could be funded to mitigate the risk of students becoming over-age prior to high school have not yet been identified. For these reasons, most working group members supported further study on students who become over-age throughout their academic career, and successful interventions to both prevent students from becoming over-age, as well as grade-band appropriate supports for students who become over-age prior to entering high school, to be considered by the 2022 UPSFF working group.

Working group members also discussed the at-risk student weight recommended in the 2013 Adequacy Study which recommended a higher overall at-risk weight but used a more limited definition of at-risk. The 2020 UPSFF Study suggests that by adopting a broader definition of at-risk (the current definition includes students who qualify for Supplemental Nutrition Assistance Program (SNAP) and students who are over-age in high school, while the 2013 Adequacy Study did not), DC's current UPSFF may provide more at-risk funding in total to LEAs, although the at-risk weight itself remains lower than the recommended weight in the Adequacy Study.²⁶ At the additional working group meeting in January, some members suggested using the Adequacy Study's at-risk weight recommendation (0.37) to determine the amount of the new weight for students with 2+ characteristics. Since the Adequacy Study did not contemplate students with multiple at-risk factors, further analysis may be necessary to determine the appropriate weight amount for the working group's recommendation.

Additionally, working group members reviewed the at-risk definition and discussed expansion of the definition to include students who are at-risk of academic failure but may not be captured in the current eligibility criteria. In DC, students are eligible for at-risk funding if they meet at least one of the following criteria: direct certification (student qualifies for the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF)), homelessness, in the District's foster care system (CFSA), or over-age in high school (D.C. Official Code §38–2901(2A)). A high school student whose age is one or more years older than the age expected for their grade is considered over-age. Each at-risk student is funded at the same level, regardless of the type of risk factor, the number of risk factors, or the combination of factors a student may have. The working group members considered other characteristics that may put a student at-risk of academic failure that may not be captured adequately in the current at-risk definition, including students who are undocumented or live with individuals who are undocumented, parenting students, students who receive home visits, and students with incarcerated parents. Working group members acknowledge that households with individuals who are undocumented historically have low participation rates in federal subsidy programs like SNAP and TANF, which results in lower at-risk designation levels and less at-risk funding, making it difficult for schools to adequately support this group of students. Several working group members expressed concern about how to safely and accurately count these students and agreed this would require further analysis.

²⁶ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part II: At-risk Student Need, p. 71, dme.dc.gov/publication/2020-upsff-study

Working group members also considered including students enrolled in alternative programs, currently funded in the UPSFF through the alternative student weight, in the at-risk weight. As currently implemented, students in alternative settings, regardless of whether they meet one or more of the existing at-risk funding definition criteria, receive the alternative weight funding, which is intended to be equivalent to the sum of the high school funding weight and the at-risk funding weight. However, some working group members acknowledged and expressed concern that the alternative student weight does not automatically increase when the at-risk or high school student weights increase, causing it to lag behind. The working group agreed that any adjustments to the at-risk or high school student weights need to formally correspond to the alternative student weight.

The working group acknowledged that performance and population trends for students at-risk of academic failure analyzed in the 2020 UPSFF Study may have significantly altered over the past year due to the public health emergency and subsequent economic impact. The number of at-risk students may be higher and the proficiency gap between at-risk and not at-risk students may be greater following the pandemic and long periods of virtual learning.

Funding Options for Concentrations of Students Designated At-risk

In considering the at-risk concentration funding formula adjustment options presented in the 2020 UPSFF Study, the working group weighed student outcomes data at the school level and the implementation difficulties of expanding the current per pupil funding formula to include a school-level factor for funding. The working group members agreed that schools with higher levels of students designated at-risk of academic failure need more funding to meet the higher needs of their students but did not agree that adding a concentration funding mechanism to the UPSFF was the best option to increase this funding. The 2020 UPSFF Study found that outcomes for students designated at-risk of academic failure in the District were closely aligned to concentration levels in schools, but national research and recent studies were inconclusive on the impact of concentration funding on student outcomes.

Most working group members expressed concerns about the implementation of the concentration funding option. Implementation of concentration funding would require adding a school-level weight to the at-risk component of the UPSFF (a change from the formula's current per student focus), increasing the complexity of the formula with both linear and non-linear funding mechanisms. A school-level concentration weight could also change each year based on student demographics and needs, making it difficult for LEAs to maintain consistency. For these reasons, most working group members preferred the at-risk student need funding options over at-risk concentration funding. However, of the at-risk concentration funding options considered, working group members indicated the most support for sliding scale concentration funding and suggested that multi-campus LEAs consider varying school-level at-risk concentrations among their schools, and allocating resources non-linearly to provide more support to their schools with higher relative at-risk concentrations.

Funding Options for the ELL Weight Structure

The 2020 working group was presented with multiple options to adjust the ELL weight structure of the UPSFF based on student outcomes data from the 2020 UPSFF Study. Of these options, working group members prioritized funding formula adjustment options for 1) students who are “new to the country” and those with limited or interrupted formal education (SLIFE) and 2) “tiering” the ELL weight by grade-level to provide additional funding to ELL students in middle and high school grades. The working group considered academic performance gaps, implementation concerns, and the number of students impacted when prioritizing funding formula adjustment options. Among sub-sets of ELL students, those with the most significant performance gaps had the lowest WIDA scores (1.0-2.9), and proficiency gaps for secondary ELL students increased while ELL students in the elementary grades significantly closed this gap compared to students who are not or no longer ELL according to the 2020 UPSFF Study. The 2020 UPSFF Study did not include an analysis of performance data for students who are “new to country” or SLIFE since a commonly accepted city-wide definition does not currently exist in DC, leading to increased implementation difficulties for these funding options. Working group members discussed the additional needs and resources required for SLIFE and “new to country” students who are most often older and are expected to learn more complex content by reading in English and through instruction in English.

Many working group members expressed concern with the small number of students identified as “new to country” and SLIFE in the 2020 UPSFF Study and recommended the consideration of additional options that would increase funding for more ELL students. For this reason, working group members also supported the “tiered” ELL weight by grade-level option to provide additional funding to ELL students in middle and high school grades who make up most of the SLIFE and “new to country” designations. Most working group members did not support targeting funding for the lowest WIDA test scores through the UPSFF due to a number of implementation issues, including the reliance on a point-in-time test for funding, general data availability, and the possibility that it could create incentives for keeping students at lower proficiency levels. Many working group members encouraged multi-campus LEAs to use their school-level funding formulas to target allocations toward students who need it most, which may be evaluated in part through students’ WIDA proficiency levels.

In addition to targeting additional funding for specific sub-sets of ELL students and “tiering” the ELL weight, working group members unanimously agreed to increase the overall ELL weight to the level recommended in the 2013 Adequacy Study (0.61). Working group members discussed the impact of current funding limitations on meeting the instructional needs of ELL students and cited the lack of an ELL weight increase since FY15 as the primary reasons for this recommendation. Although the ELL weight has not been increased, the study pointed out that the ELL per student dollar amount did increase with annual foundation or base increases.²⁷

²⁷ 2020 Uniform Per Student Funding Formula (UPSFF) Study Part IV: ELL Weight Structure, p. 6, dme.dc.gov/publication/2020-upsff-study

Working group members also discussed the increasing difficulty of the WIDA ACCESS test (a national test that was made more rigorous in recent years), contributing to a growing population of ELL students in the District. Some members suggested that OSSE lower the WIDA score required to exit from ELL services, similar to the approach taken by other jurisdictions described in the 2020 UPSFF Study. Some working group members asserted that increasing numbers of ELL students in the District's public schools requires coordinated city-wide services including standardized transcript analysis for students who are "new to country" or SLIFE. The working group mostly agreed that expanding the current city-wide programs, operating primarily within DCPS, should be explored to provide services to all the District's immigrant families with school-aged children, regardless of the sector serving those children. However, some members wanted to ensure that any expanded services would come with additional funding.

Funding Options for Foundation Level Cost Drivers

The 2020 UPSFF Study analyzed the primary cost drivers of the foundation level (e.g., personnel, non-personnel costs), as opposed to presenting options for adjustments to the foundation level based on specific factors (number of students impacted, implementation considerations, etc.) as the study did in the other sections. Since the foundation level was the last topic presented in the 2020 UPSFF Study, it was the last topic discussed by the working group, and was discussed less than the other chapters of the 2020 UPSFF Study. The working group discussed options for adjusting the foundation including increasing the foundation level by the amount recommended in the 2013 Adequacy Study and raising the foundation by the compounded annual growth rate ("CAGR") of 4.1 percent identified in the 2020 UPSFF Study. Among the working group members who supported a foundation level increase, most agreed that the level recommended in the 2013 Adequacy Study should be adjusted for cost of living in the District, inflation, and increasing overall costs of education. Other working group members thought that the 2013 Adequacy Study was outdated and should not be used for current foundation level adjustment recommendations. Working group members discussed the complexity of the foundation level in the November and January working group meetings, and acknowledged that an increase to the foundation level is just one of the levers that impact the total amount that flows through the formula, since the foundation level interacts with all of the formula's supplemental student characteristic weights and enrollment projections in order to determine an LEA's UPSFF allocation.

Working group members who supported a specific foundation percentage increase cited an anticipated negative impact from the pandemic on teacher retention, expected personnel costs, and the cost of closing learning gaps caused by distance learning as the primary reasons for their recommendation. Some working group members did not support a specific increase to the foundation because increased costs can vary from year to year but agreed the level should be increased based on the latest analysis of costs as well as taking budget considerations into account. Other working group members discouraged including a foundation level increase in this report and suggested the Group rely on an increase included in the annual budget from the Mayor.

Funding Types

The 2020 UPSFF Study analyzed the impact of incremental and redistributed funding on LEAs for each funding formula adjustment option. Most working group members disagreed with funding any option through redistribution of existing formula dollars. Since the current at-risk and ELL funding levels have not resulted in closure of performance gaps, some working group members thought that reallocating existing funding could widen these gaps for sub-sets of at-risk and ELL students that would receive less funding. A minority of working group members pointed out that budgets will be limited, particularly due to the current public health emergency.

Working Group Recommendations

Based on the review of the 2020 UPSFF Study, working group member discussion, surveys and materials provided during the working group meetings, the working group members developed recommendations for several key components of the UPSFF. The Working Group members stressed the importance of focusing their recommendations on both the UPSFF foundation level and the supplemental categories. Throughout the series of working group meetings, the process described in the narrative above was used to prioritize adjustments to the UPSFF presented in the 2020 UPSFF Study.

Recommendations for Foundation Level

Working group members reviewed the 2020 UPSFF Study's findings focused on the cost drivers impacting the UPSFF foundation (or "base") level, as well as the study's options for taking the cost drivers into account. In addition, they discussed potential options to ensure that the foundation level increases regularly as it is the funding mechanism that impacts all students and not just students with additional needs. The following summarizes the working group members' recommendation focused on the UPSFF foundational level.

Recommendation 1: The working group recommends increasing the foundation level to account for LEAs' anticipated increases in personnel and non-personnel costs, particularly in the pandemic and recovery contexts. The UPSFF foundation level should increase each subsequent year to keep in line with those costs.

The working group reviewed several options presented in the 2020 UPSFF Study about how the UPSFF foundation level could be adjusted to address the cost pressure findings of the study. The majority of working group members favored an increase to the foundation level of 4 percent, citing the study finding that DCPS and the PCS LEAs included in this study experienced a 4.1 percent Compound Annual Growth Rate (CAGR) increase in per pupil expenditures from FY16 to FY19. While the working group acknowledges the limitations of the Foundation Level Cost Drivers chapter of the study, including the limited number of charter LEA participants and the pre-pandemic period of analysis, the majority of the working group thinks this is the best information available to inform this recommendation. A smaller number of working group

members preferred prioritizing targeted funding increases to specific sub-sets of students that demonstrated the greatest academic need.

Recommendations for Special Populations

Working group members spent the majority of their time focused on how to modify the UPSFF to most effectively target funds to students designated at-risk of academic failure and ELLs, based on several options presented in the 2020 UPSFF Study. The following summarizes their final recommendations. All recommendations are for consideration within a two-year timeframe or until the next UPSFF Working Group is convened.

Recommendation 2: The working group recommends additional funding allocated through a new supplemental weight for students who have 2 or more (2+) at-risk characteristics (either TANF/SNAP, CFSA, homeless, or over-age in high school).

The working group considered several options presented in the 2020 UPSFF Study to support segments of students who qualify for the at-risk of academic failure designation whose academic performance gaps are largest compared to their at-risk and not at-risk peers. Of these options, the majority of working group members favored adding a new weight to the UPSFF for students with two or more at-risk characteristics. A smaller number of working group members favored adding a new supplemental weight for over-age high school students.

The working group's meeting time was primarily focused on evaluating the options to target at-risk funding to sub-sets of at-risk student groups demonstrating the greatest need as presented in the 2020 UPSFF Study. Working group members recommended determining the amount of the new weight in the context of relative student needs and the 2013 Adequacy Study's 0.37 at-risk weight recommendation. However, the working group acknowledged that the Adequacy Study's recommended at-risk definition was narrower than the implemented at-risk definition and did not specifically contemplate students with multiple at-risk factors. Further analysis may be necessary to determine the appropriate weight amount for the working group's recommendation.

Recommendation 3: The working group recommends revising the name of the at-risk of academic failure designation (DC Official Code § 38-2901(2A)) to language that is more asset-based than deficit-based.

An overwhelming majority of working group members agreed on this recommendation. Some working group members requested person-first language in the revised designation.

Recommendation 4: The working group recommends increasing the ELL weight to match the recommended weight from the 2013 *Cost of Student Achievement: Report of the DC Education Adequacy Study* weight of 0.61.

The working group unanimously agreed on this recommendation. Some working group members provided reasoning for their support including a lack of a UPSFF weight increase for ELL students since FY15.

Recommendation 5: The working group recommends a new additional supplemental ELL weight for students who are designated as students with limited or interrupted formal education (SLIFE) or “new to the country,” and tiering the ELL weight based on grade level.

The working group considered several options presented in the 2020 UPSFF Study to adjust the ELL weight structure in order to more efficiently target funding for ELL students with the greatest need. Of these options, the majority of working group members favored adding an additional new weight to the UPSFF for ELL students who are designated as SLIFE or “new to the country,” and to “tier” the ELL student weight by grade bands for students with larger performance gaps. Some working group members provided reasoning for their support including ease of implementation and prioritizing more targeted funding for subsets of ELL students with the largest performance gaps. A smaller number of working group members favored implementing just one of these options. When surveyed, nearly all working group members selected an option that included a SLIFE or “new to country” weight implementation, whether implemented in tandem with ELL grade-level “tiering” or on its own.

Recommendation 6: The working group recommends automatically increasing the alternative student weight to keep pace with the sum of the high school grade and at-risk of academic failure weights, should either have incremental increases.

An overwhelming majority of working group members agreed on this recommendation.

Recommendations for Further Exploration

The working group also discussed other related topics that the city would benefit from further exploration during the upcoming 2022 UPSFF Working Group.

- 1) Explore expanding the definition of the At Risk for Academic Failure designation (DC Official Code §38–2901(2A)) to include parenting students, children of incarcerated parents, and/or students who are themselves or live with undocumented family members who do not historically apply to participate in federal subsidy programs but would otherwise meet economic eligibility criteria for TANF.
- 2) Explore the creation of a city-wide, centralized Welcome Center to create a shared-services English Language center for all the District’s immigrant families with school-aged children.
- 3) Explore funding interventions for students that are over-age for their grade-level prior to reaching high school.
- 4) Explore the development of a biennial cost-analysis study to stay up to date with the cost drivers for operating a school.

Appendix A: Working Group Members

Ryan Aurori - Office of the State Superintendent of Education, Facilitator
Kevin Wenzel – Office of the Deputy Mayor for Education, Facilitator
Linsey Malig-Mayhew – Office of the Deputy Mayor for Education, Facilitator

Michael Bayuk – DC Public Charter School Board
Vanessa Carlo-Miranda – E.L. Haynes PCS
Ken Cherry – Friendship PCS
Chelsea Coffin – DC Policy Center
Jennifer Comey – Office of the Deputy Mayor for Education
Justin Ellis – KIPP DC PCS
Jeannette Fernandez – Office of Budget and Performance Management
Allen Francois – District of Columbia Public Schools
Elba Garcia – District of Columbia Public Schools
Sharon Gaskins – District of Columbia Public Schools
Shannon Hodge – DC Charter School Alliance
Qubilah Huddleston – DC Fiscal Policy Institute
Shelley Hughes – EdOps
Mary Levy – Independent
Jack McCarthy – Appletree PCS
Alonso Montalvo – Office of the Chief Financial Officer
Cathy Reilly – DCSHAPPE
Jessica Swanson – District of Columbia Public Schools
Shana Wang – District of Columbia Public Schools
Raymond Weeden – Thurgood Marshall Academy PCS
Jonathan Weinstein – Capital City PCS