



DISTRICT OF COLUMBIA  
OFFICE OF THE STATE SUPERINTENDENT OF

# EDUCATION

<b>Meeting:</b>	<b>Accountability System - STAR Framework:</b> 3-Year School Support Designation, Economically Disadvantaged Definition, and Floors and Targets	
<b>Date/Time:</b>	Wednesday, July 12 1:00 pm - 4:00 pm	
<b>Location:</b>	OSSE 810 First St. NE 3rd Floor Grand Hall Washington, DC 20002	
<b>Facilitator(s):</b>	Laura Maurizi and Kelley Scholl	
<b>Notes Posted:</b>	July 19, 2017	
<b>Meeting Objective:</b> To provide the introduction and overview of Accountability System and deep dive of the 3-Year School Support Designation, Economically Disadvantaged Definition, and Floors and Targets metrics.		
<b>Agenda Items</b>		
<b>I. 3-Year School Support Designation</b>	Laura Maurizi	
<b>II. Economically Disadvantaged Definition</b>	Kelley Scholl	
<b>III. Floors and Targets Part 1</b>	Laura Maurizi	
<b>IV. Next Steps/Next Meeting</b>	Laura Maurizi	
<b>Meeting Notes (Q &amp; A and Feedback)</b>		
<b>Slide 1: Schools without Frameworks and Schools with Multiple Frameworks</b>	N/A	
<b>Slide 2: Goals of Our Discussion</b>	N/A	
<b>Slide 3: Opportunities for Feedback and Questions</b>	N/A	
<b>Slide 4: Agenda</b>	<p><b>Q:</b> What do we do if we have follow up questions based on feedback? <b>A:</b> Email feedback on topics that are not on today's agenda. If we have time at the end of the session, we can take feedback on other sessions.</p> <p><b>Q:</b> How will you communicate to all the stakeholders the questions that were asked and the responses to those questions? <b>A:</b> We have provided the answers we have to date and post meeting notes and email feedback on our website.</p>	
<b>Slide 5: Overview of STAR</b>	N/A	

<b>Framework</b>	
<b>Slide 6: Timeline</b>	<p><b>Q:</b> When should we bring up how OSSE will use these business rules for data collection and validation?</p> <p><b>A:</b> For most of the metrics, there are already such processes; however, if people want to have additional conversations or bring additional concerns in response to today's session, please provide that feedback. If the session for a metric of concern has already passed, we can talk about it later today. We do not intend to have further meetings on data validation or collection.</p>
<b>Slide 7: Domains and Metrics</b>	N/A
<b>Slide 8: Deep Dive: 3-Year School Support Designation</b>	N/A
<b>Slide 9: 3-Year School Support Designation: Overview</b>	<b>MEETING NOTE:</b> All schools will receive designations on the same year, so there are not overlapping 3-year cycles.
<b>Slide 10: 3-Year School Support Designation: Overview</b>	N/A
<b>Slide 11: 3-Year School Support Designation: Business Rules</b>	<p><b>Q:</b> Regarding the weighted average, are you envisioning a progression and weighting the second year more than the first?</p> <p><b>A:</b> Yes.</p> <p><b>Q:</b> Are you calculating a weighted average to determine the designation?</p> <p><b>A:</b> Yes.</p> <p><b>Q:</b> How does it work for targeted support schools based on subgroups?</p> <p><b>A:</b> There are different support designations. One pertains to the bottom 5 percent. In that instance, it is important. We would be using the same methodology across all schools.</p> <p><b>Q:</b> Would you apply weighted averages at the subgroup level?</p> <p><b>A:</b> With the weighted average, we would have calculations for each subgroup.</p> <p><b>Q:</b> What is the current definition of targeted support?</p> <p><b>A:</b> Comprehensive support schools are schools that fall at the bottom 5 percent of all rankings and performance. This is outlined more detailed in our state plan. See page 32 of the DC State Plan: Definition of Targeted Support: Any school with "lowperforming" subgroups, which in DC is defined as any school with a subgroup framework score that is below the threshold used to identify schools in the bottom 5 percent for Comprehensive Support.</p> <p><b>Q:</b> If you have one low-performing subgroup, does that put you in targeted subgroup?</p> <p><b>A:</b> Subgroups comprise 25 percent of a STAR rating. We will look at bottom 5 percent in each of those subgroups for targeted support.</p> <p><b>Q:</b> Can you get a high score on a framework and not be in the bottom 5 percent for comprehensive support but still be in bottom 5 percent for a subgroup for targeted support?</p> <p><b>A:</b> Yes.</p> <p><b>Q:</b> Why is there a targeted support?</p>

	<p><b>A:</b> Targeted support is intended to target those students in the school who are struggling. Even if an LEA has high STAR rating but not doing well with students with disabilities, they will get support for those students.</p> <p><b>Q:</b> Please confirm that every year we get a STAR rating of overall school level and subgroup levels and combined. Then, there is a separate three-year school support designation based on the last three years. Using a three-year, weighted average, OSSE identifies the bottom 5 percent for all students and for subgroups to assign comprehensive and targeted support designations. This is a separate score from the annual STAR rating.</p> <p><b>A:</b> Yes.</p> <p><b>Q:</b> What are the weights that would be applied to the average?</p> <p><b>A:</b> We have not determined the exact weights yet because we wanted initial feedback on this proposal before we talk about what the exact weights would be. Other states have identified weights that are approximately 10 percentage points apart, such as 22-33-45.</p> <p><b>Q:</b> Have you done any modeling to look at how running the three years of data at different weights would produce different results?</p> <p><b>A:</b> We have not because we do not have three years of PARCC data, so it is not possible.</p> <p><b>Q:</b> Will you be making designations after 17-18?</p> <p><b>A:</b> The first designation is based on one year of data, but future designations will be based on three years of data.</p> <p><b>Q:</b> Is this a decision that has to be made this summer?</p> <p><b>A:</b> That is in the latter part of this deck in the discussion of floors and targets. It is possible for us to revisit the methodology, but we want to be able to talk through rationale and reach general consensus on the approach. LEAs need to be able to plan in advance, so we want to be as clear as possible about what this is going to look like.</p> <p><b>Q:</b> Will high school growth be included?</p> <p><b>A:</b> In the first year, for 2017-18, there is not going to be growth in high school. All metrics will be the same between the dry run and 2017-18.</p> <p><b>Q:</b> Can you confirm that in 2018-19 there won't be designation? Schools with higher growth rate than overall proficiency could dramatically shift in the second year.</p> <p><b>A:</b> If that school continues to grow in the next three years, that progress would be reflected in the 2020-21 designation.</p> <p><b>Q:</b> Is it possible for schools to exit the comprehensive or targeted support before the next school support designation in three years?</p> <p><b>A:</b> Not under the current state plan.</p> <p><b>FEEDBACK:</b> It would be helpful to outline in the business rules which changes are so significant that they would require re-engagement or recalculation similar to the rules.</p> <p><b>Q:</b> Can we form a business rule that allows us to use an unofficial year of information for the first official designation, knowing that in 2021 we would not do it again?</p> <p><b>A:</b> We can talk about this more. I think the scenarios you are proposing would be unusual in the data.</p>
<b>Slide 12: 3-Year School</b>	<b>Q:</b> Why does the school support designation need to go on a report card when you already

<p><b>Support Designation: Business Rules</b></p>	<p>have a STAR rating?  <b>A:</b> They are federally required designations, and we are required to include them on the report card:</p> <p><i>State and LEA Report Cards must include: •The number and names of all public schools in the State or LEA, as applicable, identified for comprehensive or targeted support and improvement and the reason(s) that led to such identification; (ESEA section 1111(h)(1)(C)(i)(V), (h)(2)(C); 34 C.F.R. §§ 200.30(b)(2)(i), 200.31(b)(2)(i)(A)</i></p> <p>However, we also need to make sure we communicate clearly about the differences.</p>
<p><b>Slide 13: 3-Year School Support Designation: Business Rules</b></p>	<p><b>Q:</b> Is it possible that if I have 8, 9 and 10 students in a particular subgroup each school year and that population is included in the three-year weighted average and in the bottom five percent that my school could be identified for targeted support?  <b>A:</b> Yes. The concern you have raised is you may be identified for targeted support in an instance where you had close to the N size threshold of 10 in one or two of the three years that you may then reach the N size threshold on other end when the years are combined.</p> <p><b>Q:</b> How do N size and the weighted average work with each other?  <b>A:</b> This would be done at the metric level, not the overall score level, to account for the student population.</p> <p><b>Q:</b> What happens if you miss at least one year of N size?  <b>A:</b> If the final N size reaches the threshold across three years, that subgroup would be included.</p> <p><b>Q:</b> Will schools receive notification annually if they fall into bottom 5 percent? I'm reading from OSSE's state plan that says that OSSE will do annual notification. This would be helpful to have this shared with LEA leaders and not publicly.</p> <p><b>NEXT STEP:</b> OSSE will write out the different examples with N sizes in different years and how that will play out into accountability.</p>
<p><b>Slide 14: 3-Year School Support Designation: Business Rules</b></p>	<p>N/A</p>
<p><b>Slide 15: 3-Year School Support Designation: Business Rules</b></p>	<p><b>Q:</b> Can a school opening in a school support designation year be identified for targeted or comprehensive support with a single year of data whereas other schools have 3 years of data.  <b>A:</b> Yes.</p> <p><b>Q:</b> On the previous slide, it looked like there were at least two years of data, is that accurate?  <b>A:</b> No. OSSE will use two years of data if available; however, it is proposing to use one year if that is all that is available.</p> <p><b>FEEDBACK:</b> You could do a business rule in which a school would have to have had the opportunity to earn 150 points (minimum of 50 per year) in the last three years for it to count?</p> <p><b>FEEDBACK:</b> Our concern would be then that a school could be open for five years before receiving a designation and that might not be what is best for students in an instance where a school should be receiving support. Students at that school might be unfairly waiting to receive support.</p>

<b>Slide 16: 3-Year School Support Designation: Business Rules</b>	N/A
<b>Slide 17: 3-Year School Support Designation: Summary</b>	<p><b>FEEDBACK:</b> This appears to be toughest on middle schools in the first year they open with a tested grade. Maybe these schools could get a grace year even though the designate for a star rating. This doesn't seem to be an equitable solution and needs a business rule specifically for middle schools.</p> <p><b>NEXT STEP:</b> OSSE will give the examples with different N sizes, with 8,9,10 and an example when you don't meet threshold for one of the three years</p>
<b>Slide 18: Deep Dive: Economically Disadvantaged Definition</b>	N/A
<b>Slide 19: Economically Disadvantaged: Overview</b>	N/A
<b>Slide 20: Economically Disadvantaged: Overview</b>	N/A
<b>Slide 21: Economically Disadvantaged: Overview</b>	N/A
<b>Slide 22: Economically Disadvantaged: Overview</b>	N/A
<b>Slide 23: Economically Disadvantaged: Business Rules</b>	<p><b>Q:</b> What is the impact on areas of non-accountability at OSSE?  <b>A:</b> We are going to work through this on a later slide.</p>
<b>Slide 24: Economically Disadvantaged: Business Rules</b>	N/A
<b>Slide 25: Economically Disadvantaged: Business Rules</b>	<p><b>Q:</b> What's the difference between at-risk and direct certification?  <b>A:</b> At-risk includes overage. Direct certification uses a different calendar year whereas at-risk can match a regular school calendar.</p> <p><b>Q:</b> What is the rationale for using at risk as opposed to direct certification?  <b>A:</b> They are largely aligned. Direct certification operates from Nov. 1 to Oct. 31 and the objective is to make sure students are getting meals. However, for the at-risk calendar, we can make it match our regular school calendar. Another advantage is the funding definition in that schools are receiving funds for these students, so we can align funding with the performance of this subgroup in the STAR rating.</p> <p><b>Q:</b> What is the rational for removing free and reduced lunch students?  <b>A:</b> At so many schools, we don't have that information for CEP schools. We do not know if others students would qualify because paperwork isn't being collected.</p>
<b>Slide 26: Economically Disadvantaged:</b>	<p><b>Q:</b> Is there a reason why we want more students included?  <b>A:</b> Changing the definition which identifies all students will lead to identifying fewer students,</p>

<p><b>Business Rules</b></p>	<p>so this effort is trying to strike a balance.</p> <p><b>FEEDBACK:</b> If we really want economically disadvantaged for this measure, we should use direct certification, not at-risk. If you want to more inclusive model, then use At-risk but call it that.</p> <p><b>RESPONSE:</b> Under ESSA, economically disadvantaged is a mandated reporting subgroup. We cannot call it something else. Within accountability framework, there has to be a definition.</p>
<p><b>Slide 27: Economically Disadvantaged: Business Rules</b></p>	<p><b>Q:</b> When you are talking funding, which funding are you talking about?</p> <p><b>A:</b> We are referring to UPSFF citywide at-risk funding.</p>
<p><b>Slide 28: Economically Disadvantaged: Business Rules</b></p>	<p><b>FEEDBACK:</b> As a non-CEP school, this is a concern. We will have a number of students who will no longer be included in this framework.</p> <p><b>FEEDBACK:</b> This is an equity concern and narrowing the definition more reduces ability to help students (undocumented).</p> <p><b>Q:</b> Can someone explain the administrative struggle collecting information if you are a CEP schools?</p> <p><b>A:</b> Collecting those forms every year is especially burdensome at high schools, which are larger. What it does is create an environment where you are underrepresented in families returning form but you know they are eligible. The administrative burden is high for collecting forms for everyone.</p> <p><b>Q:</b> What are other jurisdictions doing? Like ZIP Code information?</p> <p><b>A:</b> A lot of states do use the components of direct certification or TANF/SNAP/CFSA/homeless. Some states use Medicaid. You are talking about census block data, which our address information is limited and missing for upwards of 10 percent of students at any time. A methodology like that we cannot do in a robust way so we were basing this on data we have available and what other states are doing. All states are revisiting this now.</p> <p><b>Q:</b> What is the CEP threshold?</p> <p><b>A:</b> 40 percent.</p> <p><b>Q:</b> Who sets it?</p> <p><b>A:</b> USDA.</p> <p><b>Q:</b> Thank you for how you presented this. Have you done a Venn diagram of data on different definitions and reviewed the impact on whether growth and achievement are different if we used these different definitions?</p> <p><b>A:</b> It makes sense to visit the difference that would arise before making a final decision.</p>
<p><b>Slide 29: Economically Disadvantaged: Business Rules</b></p>	
<p><b>Slide 30: Economically Disadvantaged: Business Rules</b></p>	
<p><b>Slide 31: Economically Disadvantaged: Business Rules</b></p>	<p><b>Q:</b> How does this play when you think about SOAR grant especially for schools that are not CEP schools?</p> <p><b>A:</b> We met with grants management and ESSE colleagues, and we do not find any grants</p>

	<p>where student-level designations are required for grant applications. They use school-level FARM rates, and that will not be proposed to change. Please provide in feedback any funding situations where you use student-level designations.</p> <p><b>Q:</b> Would this change for PARCC reporting?  <b>A:</b> Yes, if they align at-risk and economically disadvantaged, then it would be a single reporting.</p> <p><b>Q:</b> OSSE currently reports publicly information on students who are economically disadvantaged and at-risk. Would that change or would continue to report both?  <b>A:</b> If we changed economically disadvantaged to at-risk, we would report one. If we decide on two definitions, we would continue to report out on both as appropriate.</p> <p><b>Q:</b> How are the school-level definitions affected?  <b>A:</b> We are still using our FARM data. We would still be able to have an approximation for the rate of students qualifying for FARM. For Non-CEP, we would use direct certified plus FRL. For CEP we would use direct certified x 1.6. We want this to be as least disruptive as possible for funding purposes.</p> <p><b>Q:</b> For alternative schools, we do not get at-risk, but we are CEP. If you only move to at-risk, it would be at-risk plus alternative?  <b>A:</b> That field is null or not valid for your school because alternative schools do not receive at-risk funding, but we have all of those discrete fields that comprise at-risk, so we could create.</p> <p><b>FEEDBACK:</b> The challenge with demographic certification is that for students who come and go the over age designation gets overwritten by other schools. Which school gets to decide the definition? We appeal initial data in audit. We say the student is in grade 9, and the previous school says grade 10.</p>
<b>Slide 32: Economically Disadvantaged: Business Rules</b>	N/A
<b>Slide 33: Economically Disadvantaged: Business Rules</b>	
<b>Slide 34: Economically Disadvantaged: Business Rules</b>	<p><b>FEEDBACK:</b> Recommend ensuring that the dates match with business rules for the audit.  <b>RESPONSE:</b> We will look into this.</p> <p><b>FEEDBACK:</b> Direct certified number goes down at a September 30 purge of TANF rosters. That messes up the October 5 count. But re-enrolling is complicated process. It doesn't align with the way the audit is handled. Look at business rules across the audit. Economically disadvantaged won't match audited enrollment for that subgroup. It becomes tricky to manage data with different definitions for multiple initiatives that OSSE is doing with us.</p>
<b>Slide 35: Economically Disadvantaged: Summary</b>	N/A
<b>Slide 36: Deep Dive: Floors and Targets</b>	N/A
<b>Slide 37: Floors and Targets: Overview</b>	N/A

<b>Slide 38: Floors and Targets: Overview</b>	N/A
<b>Slide 39: Floors and Targets: Overview</b>	N/A
<b>Slide 40: Floors and Targets: Overview</b>	N/A
<b>Slide 41: Floors and Targets: Business Rules</b>	N/A
<b>Slide 42: Floors and Targets: Business Rules</b>	<p><b>Q:</b> Is it possible to create a business rule that is similar that one in the PMF that sets conditions about how high the floor can jump (e.g. it cannot do so more than 33 percent)?  <b>A:</b> This is helpful feedback, and we'll evaluate this as a potential additional business rule.</p> <p><b>Q:</b> Can we have an overarching business rule that accounts for significant shifts like changing assessment, etc.?  <b>A:</b> We will look into creating a business rule like this.</p>
<b>Slide 43: Floors and Targets: Business Rules</b>	<p><b>Q:</b> Can you clarify the goal? One goal I heard was about a minimum level of dispersion. How do you define that? Another idea that I heard was that there should be some maximum floor based on research. How do you align those two ideas?  <b>A:</b> One potential business rule related to minimum level of dispersion is requiring a minimum difference between floor and target equal to number in metric, but this will require further conversations. Today we are proposing a business rule that addresses a lack of dispersion in in-seat attendance knowing this will require further conversations and that we may see this in more metrics as we move forward.</p> <p><b>Q:</b> Is this proposal about how far 10<sup>th</sup> and 90<sup>th</sup> are from each other and not about skewing in the data?  <b>A:</b> Yes.</p> <p><b>Q:</b> One suggestion is to have an accrual line after which a school would start accruing points. Can we have accrual lines for other places where there is a good dispersion but where there is a point if you reach this point you should start accruing points?  <b>A:</b> Since the system is new, we wanted to reserve setting accrual lines with rich research base. Setting accrual lines for metrics that do not have much data becomes more of a philosophical or values discussion rather than grounded in a body of evidence.</p> <p><b>Q:</b> What is 2039 ISA attendance goal?  <b>A:</b> We only have 2039 goals for PARCC, English Learner proficiency, and graduation. For other metrics, it is 10<sup>th</sup> and 90<sup>th</sup> percentiles.</p> <p><b>Q:</b> Is there research that would help set targets similarly to what you are proposing for floors?  <b>A:</b> We haven't explored it, but based on feedback, we can look at it. At higher levels of performance, it is easier to do something like that. We would run into similar issue in instances where everyone is low performing. How do we want to treat those situations? When we are establishing rules for maximum target over which everyone would earn points that we could do so in those scenarios too.</p> <p><b>Q:</b> Are you trying to make sure that those decisions are made consistently throughout different measures in the framework?  <b>A:</b> I do not mean in value, but we have looked at setting an accrual line with multiple metrics.</p>



	<p><b>Q:</b> Does it make sense to base business rules on the measure and framework?  <b>A:</b> Yes, but the risk there is that we'll have different rules and exceptions for each metric, which could get complicated and difficult to explain.</p> <p><b>Q:</b> The business rules are going to be complicated, and not many members of the public will dive this deep. I appreciate transparency of overall score, but I do not think you can reach this level of uniformity and want to push back on setting that as an expectation for the agency and ourselves.  <b>A:</b> That's helpful feedback</p>
<b>Slide 44: Floors and Targets: Business Rules</b>	N/A
<b>Slide 45: Floors and Targets: Business Rules</b>	<p><b>Q:</b> If a school doesn't have enough points to have a STAR rating but some students for some metric, they are included in floors and targets for that metric?  <b>A:</b> Yes. If they have enough students to calculate a metric but overall they do not meet the minimum 50-point threshold, those students in that metric where they met N size threshold would still be included. That school would be included in calculation of floors and targets.</p> <p><b>Q:</b> Can you provide another example?  <b>A:</b> A school that is PK-3 that has enough students for PARCC but doesn't have enough students for growth, so they do not meet minimum 50-point threshold but still have 80 students that take PARCC exam.</p> <p><b>Q:</b> Schools that end at 3<sup>rd</sup> grade won't have a rating.  <b>A:</b> They will likely have enough points.</p> <p><b>Q:</b> Would a PK-2 school have CLASS and attendance included in floor and targets but not receive a STAR rating because it did not get to the 50-point threshold?  <b>A:</b> Yes. The idea behind that is to establish targets that reflect students in the state overall. Regarding attendance, even if a school that serves PK-2 doesn't have a STAR rating, they could be performing really well or really poorly. Either way, the attendance of those students is important and would be reported on report cards so those values and those students should be counted in overall calculations of floors and targets.</p>
<b>Slide 46: Floors and Targets: Business Rules</b>	
<b>Slide 47: Floors and Targets: Business Rules</b>	<p><b>Q:</b> When you include elementary school students in K-8 with elementary and middle school students, what is the definition of an elementary school and a middle school?  <b>A:</b> Traditionally in research, grade buckets we have reported are K-5 are elementary school, 6-8 are middle school and 9-12 are high school. Those are the traditional grade buckets. In instance when you are K-8: K-5 are included with elementary school calculations and grades 6-8 are included in middle school floors and targets. .</p> <p><b>Q:</b> For the K-8 framework, are there two separate floors and targets – elementary school and middle school?  <b>A:</b> Yes. They would be different based on the grade the student is in.</p> <p><b>Q:</b> What would our target be if I'm looking at a DCPS elementary school that ends at grade 5 with a target for 4+ achievement?  <b>A:</b> Whatever target for achievement you are setting could or could not be aligned with 10<sup>th</sup> and 90<sup>th</sup> percentiles in terms of point allocation.</p>

	<p><b>Q:</b> Even though our middle school starts in grade 5, those students would be included in elementary school framework?  <b>A:</b> It is worth having a separate discussion on this because you have different grade bands you have decided for elementary school and middle school. I know this is complicated. We have many grade configurations with upwards of 30 in the state.</p> <p><b>Q:</b> For context, how many schools other than ours does that apply to?  <b>A:</b> There are fewer than ten K-8 schools.</p> <p><b>Q:</b> Will it be up to the school to decide which framework applies and which grades are elementary or middle school?  <b>A:</b> In internal calculations, we have looked at predominant grade served and made determinations based on labels/names used. However, in the absence of school self-identifying, we have tried to use traditional grade configurations in how we have preliminarily run floors and targets.</p> <p><b>Q:</b> This aligns with treatment of schools with multiple frameworks, two STAR ratings, that is for schools that are separate. Not K-8 schools. The elementary school and the middle school would get different rating?  <b>A:</b> There would be two STAR ratings to align with different floors and targets.</p> <p><b>Q:</b> You submitted a K-8 framework in framework in the proposal, but this proposal will give two star ratings to K-8 schools?  <b>A:</b> This speaks more to how we calculate floors and targets within K-8 and how to make a STAR designation.</p> <p><b>Q:</b> I understand about floors and targets, but there are not definitions for how schools fall into the four frameworks.  <b>A:</b> We need to provide more clarifications about this.</p> <p><b>Q:</b> I think this came up with setting floors and targets. However you have chosen to define yourself by grade, you are allowed to do that. But for us 5<sup>th</sup> grade is elementary school and 6-8 is middle school and that is how our kids will be used. I would propose it would make it easier if we just had two separate ratings. The elementary school rating and middle school rating.  <b>A:</b> That is what we are proposing.</p> <p><b>FEEDBACK:</b> We should be able to report to OSSE where our split is. The LEA should define.  <b>RESPONSE:</b> There are some business rules around that that could help, like having a separate principal.</p> <p><b>Q:</b> One thought as an alternative – somehow including kids from all schools and non-graded students – when setting floors and targets for K-8 schools.  <b>A:</b> Yes.</p> <p><b>Q:</b> It is confusing to have two STAR ratings for the same campus.  <b>A:</b> Thank you for that suggestion. The next floors and targets meeting is Jul. 27. We may have to push this discussion to then.</p>
<p><b>Slide 48: Floors and Targets: Business Rules</b></p>	<p>N/A</p>

<b>Slide 49: Floors and Targets: Business Rules</b>	<p><b>Q:</b> The floor doesn't have any similar adjustment?</p> <p><b>A:</b> No, but that is something we considered. We thought under a scenario where we are not growing as a state and that the floor would remain static over time is problematic. What we have said is we will just do apply the stretch goal to the 90<sup>th</sup> percentile but want to revisit every three years when we revisit floors and targets. If there is a scenario where we are not moving, we would like to think about moving the floor up to make sure we are holding schools to long-term goals.</p> <p><b>Q:</b> Why did PCSB move away from setting 10<sup>th</sup> and 90<sup>th</sup> adjusted for long term?</p> <p><b>A:</b> [Erin from PCSB] We still currently use 10<sup>th</sup> and 90<sup>th</sup> for many of our measures.</p> <p><b>Q:</b> When it comes to score on the framework, it is weighted by the number of students that make up each group, not getting multiple stars.</p> <p><b>A:</b> Each of metrics has a different population and that gets confusing. But we understand the sentiment.</p>
<b>Slide 50: Floors and Targets: Business Rules</b>	
<b>Slide 51: Floors and Targets: Business Rules</b>	N/A
<b>Slide 52: Floors and Targets: Business Rules</b>	N/A
<b>Slide 53: Floors and Targets: Business Rules</b>	N/A
<b>Slide 54: Floors and Targets: Summary</b>	N/A
<b>Slide 55: Questions and Next Steps</b>	N/A
<b>Slide 56: Ways to Stay Engaged</b>	N/A

**Feedback via [OSSE.ESSA@dc.gov](mailto:OSSE.ESSA@dc.gov)**

**Public Charter School Board**

- Before OSSE begins Data Collection and Submission for data that has already been collected and validated by DC PCSB (SAT/PSAT/AP re-enrollment, etc.), OSSE should use our data and process. The overburden on schools for the pilot program is not necessary and a huge misuse of time and resources.
- OSSE and DC PCSB should plan joint validations windows for next year in which they will validate data together. The process must be a joint process (not one owned solely by OSSE with DC PCSB only having access to data without also being fully involved in the decision-making). This can be drafted in an MOU and must be done ASAP.
- It was stated at the meeting that OSSE will only introduce new measures every three years. DC PCSB strongly advocates that OSSE add high school growth in the following year, not wait until 2020-21.
- For the 3-year designation, we recommend there be at least two years of data (out of the three) to develop an overall score or a subgroup score.
  - This would remove first year schools from receiving a designation and schools with very low n-size in a subgroup. If a school only reaches 10 students in a subgroup one year (and has less than 10 in the other two years), the school should not receive a designation.
  - A first-year school should not be eligible to receive a designation.
- Please consider an additional business rule for the floors and targets that they will not change more than x% when recalculated. Because the floors and targets are only changing every three years, the following year could see large shifts. The additional business rule would help to mitigate large shifts in scores. DC PCSB includes a business rule that a floor or target will not change more than 33.3% for the PMF.

- DC PCSB strongly advocates against two star ratings for a single PK-8 campus. The plan submitted to the Department of Education (DOE) has a single rating plan for PK-8 schools and this should be maintained. Two ratings for a single campus at the PK-8 level is confusing for accountability and for parents.
  - o Suggested options to maintain a single rating:
    - Option 1: For each grade combination, calculate the floor and target including all students in these grades. OSSE stated they don't want to run floors and targets on only PK-8 grade schools because of the smaller sample size. For a PK-8 school's attendance rate, take school level rates for each school in the city that has any combination of PK-8 grades and then calculate the 10<sup>th</sup> and 90<sup>th</sup> percentiles. This would similarly be done for a 4-8 school and all combinations. This would allow OSSE to use the framework already proposed to DOE. This is preferred as it would allow every school to be compared to all students in the city in the same grades.
    - Option 2: For PK-8 schools, use the framework proposed to DOE but base the amount of points allocated for each measure on n-size. For the 10 points allocated for PARCC 4+ ELA, if a school has 60% of students in grades 3-5 and 40% of students in grades 6-8, display both rates of PARCC ELA 4+ with the aligned floor and target but then give 6 of the possible points to grades 3-5 and 4 possible points to grades 6-8.

### **Center City Public Charter Schools**

During last Wednesday's ESSA business rules session, we learned OSSE plans to institute ESSA business rules ensuring nearly 40 District schools serving grades PK-8 will earn multiple STAR ratings. We believe generating multiple ratings does not treat PK-8 schools as the singular institutions of learning they are and fails to respect the original intention of the OSSE ESSA plan PK-8 framework. Also, generating multiple ratings for a single school will create unnecessary public confusion.

Center City is the second largest LEA when it comes to the number of PK-8 schools. We take great pride in offering parents the option of a small school setting where their children experience a consistent educational experience from age 3 until high school. Each school has a single leadership team focused on quality instruction for all children.

We thoroughly disagree with the presented business rules that will generate multiple ratings for our schools. We understand the premise of using the most comparable data for every school's rating when determining the school's performance against a floor and target. There are many ways OSSE can accomplish this goal without generating multiple confusing overall ratings. For example, OSSE could create individual floors and targets for the performance of each grade level, and then calculate a weighted aggregate performance score for the school based on the number of tested students in each grade.

Our leadership team is happy to meet with OSSE to devise a better set of business rules which ensure fair comparisons for every school without the confusing multiple ratings.

### **Two Rivers Public Charter School**

The recommendation to change the definition of Economically Disadvantaged is a major shift that requires much more discussion. If the definition is changed, we agree with the recommendation to continue using FARMS numbers for school-level designations and for all purposes not related to ESSA accountability. Again, this is a significant shift, and we would be uncomfortable with making such a change without the opportunity for additional discussion and modeling of potential consequences, particularly if funding were to be affected.

### **E.L. Haynes Public Charter School**

#### ***3-Year Support Designation***

- We recommend OSSE reconsider using a larger n-size than 10 students for accountability purposes. Schools with small n-sizes may experience fluctuations from year to year that may then result in having designations based on fewer than three years' worth of data. OSSE should explore business rules that will prevent a school from falling into targeted support based on just one year of subgroup performance.

- New schools with only one year of data should not be compared to established schools for the purposes of making support designations. The comparison is not valid, and a support designation should reflect persistent performance problems rather than a (possibly) short-term challenge. We recommend that OSSE consider a grace period whereby a school would not be identified for comprehensive or targeted support until two or three years of STAR ratings are available.
- Given that OSSE is federally required to publicly report a school's support designation, we encourage OSSE to report them in a way that is non-prominent and avoids confusion with a school's one-year STAR rating.

***Economically Disadvantaged Definition (Part 1)***

- The recommendation to change the definition of Economically Disadvantaged is a major shift that requires much more discussion. Use of the At-Risk definition would result in a much smaller subgroup across the city and would mean that many schools that currently report on FARMs students for accountability purposes would no longer have a reportable economically disadvantaged subgroup.
- We recommend OSSE conduct state-level analysis to compare the impact of each of the proposed definitions for Economically Disadvantaged to gauge the impact of specific categories (i.e. Direct Certification, FARMs, over-age) before changing this definition.

***Floors and Targets (Part 1)***

- We strongly encourage OSSE to establish rules to clearly outline what qualifies as a "significant change" to the accountability framework that would prompt a revision to the floors/ceilings or timing of determinations, including the process for how business rules will be adjusted.
- OSSE should also establish a process to address and define a significant change to any assessment included in the accountability framework (i.e. changes to the SAT/PSAT).
- These rules should also address what happens when/if assessments change and define what a significant change to the assessment may be (e.g. changes in SAT/PSAT).
- We recommend OSSE exclude outliers when calculating the floors and targets of each metric. We also add a maximum increase of floors and maximum decrease of targets.
- Currently, OSSE is proposing to revise the floors and targets for every metric on a three-year cycle only using the data from the year before the revision. We strongly recommend that OSSE base these calculations on an average of the three previous in order to control for random fluctuations in data year to year.
- The PCSB sets floors and targets for metrics on the elementary and middle school PMF based on an average of all K-8 students in the charter sector. PCSB made this decision after conducting analysis to compare the averages of only elementary and only middle grades and did not find a meaningful difference between the two. We recommend that OSSE conduct a similar analysis to determine if the results of elementary and middle are different enough to warrant the additional complication of issuing two STAR ratings to K-8 schools.
- If the results are similar to those of PCSB, we recommend that OSSE use an overall K-8 average to set floors and targets for all elementary, middle, and K-8 schools. We will believe this will help mitigate the issue of how to split frameworks for K-8 schools and potential confusion to the public.

**Lee Montessori Public Charter School**

***3-Year School Support Designation***

It is impossible to evaluate the pros and cons of different methods of combining three years of data without a more detailed understanding of how different weights and methods would work. We request that OSSE provide more detailed examples illustrating its recommendations, and run some models illustrating how different decisions would work in practice, as well as ensure a "hold harmless" period.

- Making targeted support designations based on extremely small n-sizes for subgroups is problematic. It could be especially problematic when n-sizes fluctuate so that a school does not have a valid subgroup in all years. Business rules could prevent schools from falling into targeted support status based on just one year of subgroup performance.

- New schools with only one year of data, as well as new grades with only one year of data (for schools growing grade-by-grade) should not be compared to established schools for the purposes of making support designations. The comparison is not valid, and a support designation should reflect persistent performance problems rather than a possibly short-term challenge. Consider a grace period whereby a school would not be identified for comprehensive or targeted support until two or (ideally) three years of STAR ratings are available. This is of particular concern for new middle schools which tend to open with tested grades in year one.
- Consider a business rule that states “Schools (and subgroups) must have been able to earn a grand total of 150 points under the STAR system in the last 3 years to qualify for a 3-year Designation Score. For schools (or subgroups) with less than 150 total possible STAR points then OSSE may include a 4th or 5th prior year of STAR data. If no additional 4th or 5th prior year is available, then OSSE will give the school (or subgroup) a “3-year” designation after the school year in which the total possible STAR points finally reaches 150 and then the school (or subgroup) will follow the typical OSSE 3-year cycle moving forward.
- OSSE should consider waiting to lock in detailed business rules until there is more data available. Is it possible to develop interim business rules for the dry run and then revisit them based on information from the dry run?
- The recommendation to change the definition of Economically Disadvantaged is a major shift that requires much more discussion. Use of the At-Risk definition would result in a much smaller subgroup across the city and would mean that many schools that currently report on FARM students for accountability purposes would no longer have a reportable economically disadvantaged subgroup. The rationale for such a disruptive change is not compelling.
- If the definition is changed, agree with the recommendation to continue using FARM numbers for school-level designations and for all purposes not related to ESSA accountability.

#### ***On Floors and Targets***

- Floor and target measures should be modeled to determine if choices have disproportionate impact on any particular grade configuration.
- OSSE should reconsider waiting 3 years after initial designations for high school due to the introduction of the growth measure in the intervening years. Currently, there is too little data to commit to the timing proposed for designating HS status.
- OSSE should consider waiting until SY18-19 to begin instituting the 3-yr designations and cycle. There could be a temporary designation using the one-year SY17-18 data for the year SY18-19, and then use 2 years of data to begin the 3-year designation cycle instituted in SY19-20. OR Use unofficial results from the SY16-17 “dry run” conducted this fall in the first 3-yr designation score calculations next summer/fall.
- PK-8th grade campuses should not receive two separate STAR ratings. This is confusing and inconsistent with the ESSA plan. Possible ways to create a single rating include: 1. Calculate the floor and target for each grade combination using all students in these grades across the city. So for a PK-8 school's attendance rate, take school level rates for each school in the city that has any combination of PK-8 grades and then calculate the 10th and 90th percentiles. 2. Base the amount of points allocated for each measure on n-size. For the 10 points allocated for PARCC 4+ ELA, if a school has 60% of students in grades 3-5 and 40% of students in grades 6-8, display both rates of PARCC ELA 4+ with the aligned floor and target but then give 6 of the possible points to grades 3-5 and 4 possible points to grades 6-8.
- Consider a business rule that limits the size of any jump in the floor from one year to the next. (The PMF has a rule that could be used as an example.)
- Rules should be set to define what qualifies as “major changes” to the frameworks that would require revisiting floors/ceilings or timing of determinations, and should lay out a process for how business rules would be adjusted. These rules should also address what happens when/if assessments change and define what a significant change to the assessment may be (e.g. changes in SAT/PSAT).

#### **Friends of Choice in Urban Schools (FOCUS)**

##### ***On 3-Year School Support Designation***

- It is impossible to evaluate the pros and cons of different methods of combining three years of data without a more detailed understanding of how different weights and methods would work. Request that OSSE provide more detailed examples illustrating its recommendations, and run some models illustrating how different decisions would work in practice.

- Making targeted support designations based on extremely small n-sizes for subgroups is problematic. It could be especially problematic when n-sizes fluctuate so that a school does not have a valid subgroup in all years. Business rules could prevent schools from falling into targeted support status based on just one year of subgroup performance.
- New schools with only one year of data should not be compared to established schools for the purposes of making support designations. The comparison is not valid, and a support designation should reflect persistent performance problems rather than a possibly short-term challenge. Consider a grace period whereby a school would not be identified for comprehensive or targeted support until two or (ideally) three years of STAR ratings are available. This is of particular concern for new middle schools which tend to open with tested grades in year one.
- Consider a business rule that states “Schools (and subgroups) must have been able to earn a grand total of 150 points under the STAR system in the last 3 years to qualify for a 3-year Designation Score. For schools (or subgroups) with less than 150 total possible STAR points then OSSE may include a 4th or 5th prior year of STAR data. If no additional 4th or 5th prior year is available, then OSSE will give the school (or subgroup) a “3-year” designation after the school year in which the total possible STAR points finally reaches 150 and then the school (or subgroup) will follow the typical OSSE 3-year cycle moving forward.
- OSSE should consider waiting to lock in detailed business rules until there is more data available. Is it possible to develop interim business rules for the dry run and then revisit them based on information from the dry run?

#### ***On Economically Disadvantaged definition***

- The recommendation to change the definition of Economically Disadvantaged is a major shift that requires much more discussion. Use of the At-Risk definition would result in a much smaller subgroup across the city and would mean that many schools that currently report on FARMS students for accountability purposes would no longer have a reportable economically disadvantaged subgroup. The rationale for such a disruptive change is not compelling.
- If the definition is changed, agree with the recommendation to continue using FARMS numbers for school-level designations and for all purposes not related to ESSA accountability.

#### ***On Floors and Targets***

- Floor and target measures should be modeled to determine if choices have disproportionate impact on any particular grade configuration.
- OSSE should reconsider waiting 3 years after initial designations for high school due to the introduction of the growth measure in the intervening years. Currently, there is too little data to commit to the timing proposed for designating HS status.
- OSSE should consider waiting until SY18-19 to begin instituting the 3-yr designations and cycle. There could be a temporary designation using the one-year SY17-18 data for the year SY18-19, and then use 2 years of data to begin the 3-year designation cycle instituted in SY19-20. OR Use unofficial results from the SY16-17 “dry run” conducted this fall in the first 3-yr designation score calculations next summer/fall.
- PK-8th grade campuses should not receive two separate STAR ratings. This is confusing and inconsistent with the ESSA plan. Possible ways to create a single rating include: 1. Calculate the floor and target for each grade combination using all students in these grades across the city. So for a PK-8 school's attendance rate, take school level rates for each school in the city that has any combination of PK-8 grades and then calculate the 10th and 90th percentiles. 2. Base the amount of points allocated for each measure on n-size. For the 10 points allocated for PARCC 4+ ELA, if a school has 60% of students in grades 3-5 and 40% of students in grades 6-8, display both rates of PARCC ELA 4+ with the aligned floor and target but then give 6 of the possible points to grades 3-5 and 4 possible points to grades 6-8.
- Consider a business rule that limits the size of any jump in the floor from one year to the next. (The PMF has a rule that could be used as an example.)
- Rules should be set to define what qualifies as “major changes” to the frameworks that would require revisiting floors/ceilings or timing of determinations, and should lay out a process for how business rules would be adjusted. These rules should also address what happens when/if assessments change and define what a significant change to the assessment may be (e.g. changes in SAT/PSAT).

#### **District of Columbia Public Schools**

### ***Determining 3-Year Support Designation for Schools with Less than Three Years of Data:***

- We suggest that OSSE provide additional clarity on what it means to have a certain number of years of data. Does having a year of data start when any data is available even if it's insufficient for the 50 point minimum? Or does having a year of data count once the 50 point minimum is met? For example, a new elementary school that will serve K-5 will not meet the minimum 50 points until the school has a 3rd grade cohort. Once that school has a 3rd grade cohort, does that count as having one year of data or are the previous K-2 cohorts counted meaning the school has four years of data?
- For determining a support designation for schools with less than three years of data, OSSE's proposal of using as many years of data that are available (including one year of data if only that is available), will disproportionately affect new/growing middle schools. Middle schools are the only school type that would meet the 50 point minimum threshold needed to calculate a star rating in their first year of operation (as was noted in the feedback regarding whether schools with no frameworks). Furthermore, with this proposal, there will be schools that receive designations based on different years of data (one school may receive a designation based on three years of data while another school would have a designation based on one year).
- Given this, we strongly recommend that a minimum of two years of data be used to determine the support designation.

### ***Defining Economically Disadvantaged***

- We propose maintaining the current definition of economically disadvantaged. The at-risk definition presented has the potential to under identify students who are economically disadvantaged. We would prefer to err on the side of over identify than under to ensure that these students receive needed support. Additionally, having multiple definitions may create confusion and unintended consequences around funding and programmatic decisions in the future by those who are not familiar with the historical context. Given the lack of ideal alternatives for changing the definitions, we recommend maintaining the current definition.

### ***Floors and Targets***

- To address the concerns regarding metrics that will have minimal dispersion, we agree with developing a maximum floor.
- For consistency, we proposed maintaining a consistent methodology for developing the floors and targets (using methodology one of the 10th and 90th percentile only). While we acknowledge that having targets tied to the goals in the ESSA plan would be ideal, the goals in the plan are not rooted in any historical data.
- We request that OSSE clarify the level at which the floors and targets will be set. Will they be set at the grade-level or at the student-level based on the grade configuration of the school (for K-5 schools, use all students in grades 3-5, for K-8 schools, use all students in grades 3-8, for MS, use all students in grades 6-8)?
- Clarity on Frameworks (as discussed as part of the floors and targets conversation)
- We request that OSSE clarify if there is a K-8 framework? On page 27 of the ESSA plan, a K-8 framework is referenced. However, in yesterday's meeting, it seems K-8 schools will now receive two star ratings (also suggested in slide 47 in yesterday's PowerPoint) because there is not a K-8 framework. Has there been a change from the plan? If so, can OSSE provide the rationale for this change?

### **Eagle Academy PCS**

#### ***Request for schools serving PK3-3 to have an alternative to the STAR Framework***

- There is an immediate need to offer an alternative framework for schools serving PK3-3. Schools that serve PK3-3 are unable to gain points for the academic growth metric. The academic growth metric comprises 40 out of the proposed 100 points. Therefore, schools with PK3-3 are only scored out of a possible 60 points. This creates a structure in which all remaining metrics now comprise a larger percentage of the STAR rating for these schools (for e.g. Academic Achievement comprises of 50% of the metric for the PK3-3 schools as opposed to 30% for other schools.)
- This issue is further compounded by the fact that some PK3-3 schools will not meet the minimum number of students required to have scores for the ACCESS growth metric. This leads to these schools being scored out of 55 total points, thus further increasing the inequity of the proposed framework.



### ***Addressing Students with Disabilities in the STAR Framework***

- Schools have differing proportions of students with disabilities at each level (i.e., levels 1 through 4). Schools serving large populations of level 4 students will be
- disproportionately impacted in the framework in the following ways:
  - Scores for academic growth and achievement will be lowered for both overall and subgroup calculations (the point system assigns 10 points to this subgroup as opposed to 5 points for other subgroups.)
  - These schools will be more likely to receive a targeted designation based on the students with disabilities subgroup.
- We request a meeting to discuss this topic with the larger school community.

### ***On 3-Year School Support Designation***

- It is impossible to evaluate the pros and cons of different methods of combining three years of data without a more detailed understanding of how different weights and methods would work. Request that OSSE provide more detailed examples illustrating its recommendations, and run some models illustrating how different decisions would work in practice.
- Making targeted support designations based on extremely small n-sizes for subgroups is problematic. It could be especially problematic when n-sizes fluctuate so that a school does not have a valid subgroup in all years. Business rules could prevent schools from falling into targeted support status based on just one year of subgroup performance.
- New schools with only one year of data should not be compared to established schools for the purposes of making support designations. The comparison is not valid, and a support designation should reflect persistent performance problems rather than a possibly short-term challenge. Consider a grace period whereby a school would not be identified for comprehensive or targeted support until two or (ideally) three years of STAR ratings are available.
- Consider a business rule that states “Schools (and subgroups) must have been able to earn a grand total of 150 points under the STAR system in the last 3 years to qualify for a 3-year Designation Score. For schools (or subgroups) with less than 150 total possible STAR points then OSSE may include a 4th or 5th prior year of STAR data. If no additional 4th or 5th prior year is available, then OSSE will give the school (or subgroup) a “3-year” designation after the school year in which the total possible STAR points finally reach 150 and then the school (or subgroup) will follow the typical OSSE 3-year cycle moving forward.
- OSSE should consider waiting to lock in detailed business rules until there is more data available. Is it possible to develop interim business rules for the dry run and then revisit them based on information from the dry run?

### ***On Economically Disadvantaged definition***

- Schools in wards 7 and 8 have historically served higher proportions of students categorized as economically disadvantaged (based on the federal definition). Changing the definition to only encompass at-risk based on OSSE’s definition could disproportionately impact schools in these wards.
- We request that OSSE provides an analysis on how changing the definition of economically disadvantaged to at-risk would impact results in the model.
- The recommendation to change the definition of Economically Disadvantaged is a major shift that requires much more discussion. Use of the At-Risk definition would result in a much smaller subgroup across the city and would mean that many schools that currently report on FARMs students for accountability purposes would no longer have a reportable economically disadvantaged subgroup. The rationale for such a disruptive change is not compelling.
- If the definition is changed, agree with the recommendation to continue using FARMs numbers for school-level designations and for all purposes not related to ESSA accountability.

### ***On Floors and Targets***

- Floor and target measures should be modeled to determine if choices have disproportionate impact on any particular grade configuration.
- OSSE should consider waiting until SY18-19 to begin instituting the 3-yr designations and cycle. There could be a temporary designation using the one-year SY17-18 data for the year SY18-19, and then use 2 years of data to begin the 3-year designation cycle instituted in SY19-20. OR Use unofficial results from the SY16-17 “dry run” conducted

this fall in the first 3-yr designation score calculations next summer/fall.

- Consider a business rule that limits the size of any jump in the floor from one year to the next. (The PMF has a rule that could be used as an example.)
- Rules should be set to define what qualifies as “major changes” to the frameworks that would require revisiting floors/ceilings or timing of determinations, and should lay out a process for how business rules would be adjusted. These rules should also address what happens when/if assessments change and define what a significant change to the assessment may be (e.g. changes in PARCC, SAT/PSAT).

#### Next Steps

1. LEAs can provide feedback within 3 business days (by July 17, 2017) via [OSSE.ESSA@dc.gov](mailto:OSSE.ESSA@dc.gov).
2. Notes will be send out 5 business days after the meeting (by July 19, 2017).

#### Next Meeting

Friday, July 14, 2017  
2:00 pm – 4:00 pm

OSSE  
810 First St. NE  
Conference Room 806  
Washington, DC 20002