



DEC 01 2016

Dr. Tony D. Johnson  
Director, District of Columbia, State Office of Career and Technical Education  
Office of State Superintendent of Education  
810 First Street NE, 2nd Floor #2028-C  
Washington, District of Columbia 20002

Dear Dr. Johnson:

Enclosed is the final report for the June 6–10, 2016, on-site monitoring visit conducted by the U.S. Department of Education (Department), Office of Career, Technical, and Adult Education (OCTAE), Division of Academic and Technical Education (DATE), pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins, Perkins IV, or the Act). The purpose of this monitoring visit was to assess the degree to which the District of Columbia's Office of the State Superintendent of Education (DC OSSE), which is the agency that has been delegated responsibility by the District of Columbia Commission for Career and Technical Education (DC CCTE) (the sole state agency) to implement its Perkins grants to administer its Perkins grants, is meeting the requirements of Perkins IV. We hope that as a result of this visit, your State will identify ways to improve its Perkins administration, implementation, and accountability systems.

The DATE monitoring team identified four (4) compliance findings during its review. These findings are contained in the fiscal, local applications, accountability, and programs of study sections of the report. Applicable sections of Perkins IV and/or other relevant compliance documents are cited for each finding, along with corrective actions that the State must take to achieve compliance with Perkins IV. **Unless otherwise noted, all corrective actions must be submitted to our office for review and approval by close of business on Friday, March 17, 2017.**

The monitoring team also identified improvement strategies within specific sections of the report as possible ways for the State to strengthen its Perkins administrative, implementation, and accountability systems. We encourage you to implement these strategies, although you are not required to do so.

Thank you for a productive visit and your willingness to discuss strategies to prepare all career and technical education students in the District of Columbia for a successful future.

Sincerely,

Sharon Lee Miller

Director

Division of Academic and Technical Education

Enclosure

[www.ed.gov](http://www.ed.gov)

**FINAL REPORT:**  
**District of Columbia's Compliance with the**  
**Carl D. Perkins Career and Technical Education Act of 2006**  
**(Perkins IV)**

## Overview

The U. S. Department of Education (Department), Office of Career, Technical, and Adult Education (OCTAE), Division of Academic and Technical Education (DATE), conducted an on-site monitoring visit to the District of Columbia's Office of the State Superintendent of Education (DC OSSE) on June 6–10, 2016, pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins, Perkins IV, or the Act). The purpose of this monitoring visit was to assess the degree to which the DC OSSE, the agency that has been delegated responsibility by the District of Columbia State Board of Education (DC SBE) (the sole state agency) to implement its Perkins IV grant is meeting the requirements of Perkins IV.

The DC OSSE's Division of Postsecondary and Career Education (STATE) provides more than 8,000 students with career and technical education (CTE) programming in 34 CTE programs within 11 career clusters. These programs are offered via the State's Perkins secondary and postsecondary subrecipients within 20 high schools and public charter schools, the Education Services of Greater Washington, and the University of the District of Columbia-Community College (UDC-CC).

## Monitoring Team Members

<b>Name</b>	<b>Area(s) of Review</b>
Edward R. Smith*	Local Applications
Andrew Johnson	Fiscal Program Responsibility
Jay Savage	Accountability, Special Populations
Sherene Donaldson	Programs of Study

\* Monitoring Team Lead

## Areas of Review

**NOTE:** What follows is a brief review of several District of Columbia Public Schools reorganization plans that were designed to provide effective career and technical educational opportunities to District of Columbia students. As a result of these changes, CTE programming at DCPS involving the transfer of Perkins State Administration and State Leadership activities from DCPS to the State Office of Career and Technical Education (SOCTE) within DC OSSE.

*CTE Delivery System Prior to 2007:* From the standpoint of Federal education policy, Washington, D.C. has a unique duality (without precedent elsewhere in the country) as both a "State"—the District of Columbia, and city oversight; Washington, DC. For almost 40 years, the District of Columbia Board of Education, established by D.C.'s Home Rule Charter played a corresponding dual role: as both DC's State Board of Education and Washington's Local Board of Education. Similarly, CTE Delivery System Prior to 2007: From the standpoint of Federal education policy, D.C. has a unique duality (without precedent elsewhere in the country) as both a "State"—the District of Columbia, and city oversight; Washington, DC. For almost 40 years,



the District of Columbia Board of Education, established by D.C.'s Home Rule Charter played a corresponding dual role: as both DC's State Board of Education and Washington's Local Board of Education. Similarly,

District of Columbia Public Schools (DCPS)—in its capacity as the staff of the D.C. BOE—played a dual role as, in effect, the “Washington D.C. Department of Education” and the “City of Washington School Department.”

Moreover, for the specific purposes of the Perkins Act, the DC BOE represented both a State “Eligible Agency” as defined in §3(9)—a State Board designated as the sole State agency responsible for the administration or oversight of CTE in the State—and a local “Eligible Recipient” as defined in §3(11)—an LEA (including a public charter school) eligible to receive assistance under §131.

Correspondingly, the DCPS Office of Career and Technical Education (OCTE) was assigned responsibility for both State Administration and State Leadership under Perkins sections 112 and 124 (among others), and Local Plans and Uses of Funds under sections 134 and 135.

*CTE Delivery System 2007 to the Present:* The Public Education Reform Amendment Act of 2007: The purpose of the Public Education Reform Amendment Act of 2007 include the following: 1) established the District of Columbia Public Schools as a cabinet-level agency subordinate to the Mayor; 2) created a Chancellor of the District of Columbia Public Schools; 3) established a Department of Education headed by a Deputy Mayor for Education; 4) amended the State Education Office Establishment Act of 2000 to change the name of the State Education Office to the Office of the State Superintendent of Education; and 5) transferred and assign state-level education agency functions to the State Superintendent of Education Office.

On April 19, 2007, final passage of the Public Education Reform Amendment Act of 2007 (PERAA) set the stage for major structural changes in the administration of public education in the District of Columbia—including the administration of Federal education assistance programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (P.L. 109-270). With the passage of PERAA, the role of the DC Board of Education has been recast in strictly State-level terms.

Under the new framework, the DC BOE became an advisory body, the DC State Board of Education. All State-level functions were transferred from DCPS to the Office of the State Superintendent of Education (DC OSSE—previously the State Education Office, SEO) and other agencies under the umbrella of the new DC Department of Education (DC DOE).

With respect to Perkins Act programming, Perkins State Administration and State Leadership activities were transferred from DCPS OCTE to the State Office of Career and Technical Education (SOCTE) within DC OSSE—effective October 1, 2007, the beginning of the Federal and District of Columbia 2008 fiscal years.

Local functions performed by DCPS/OCTE were unaffected by the transfer of State functions to DC OSSE, as are the local operations of other eligible recipients under §131—including DC Public Schools and DC Charter schools.

## **A. Fiscal Program Responsibility**

### ***Current Status:***

The OSSE received a Perkins IV Title I basic grant award totaling \$4,214,921 for program year (PY) 2016-17, beginning on July 1, 2016. The State targeted 5.93 percent of its Title I funds for State administration activities and 9.06 percent for State leadership. From its State leadership funds, the State allotted \$150,000 for nontraditional activities and \$42,150 for State institutions. The remaining 85.01 percent of the Title I funds were allocated to secondary and postsecondary eligible recipients, with 83.74 percent of these funds slated for the secondary level, and 16.26 percent for the postsecondary level.

For PY 2016, the OSSE is currently in the process of utilizing Title I ten percent reserve funds under the authority of section 112(c) for the first time under the Perkins IV law. The OSSE is planning to distribute these funds to four (4) charter school districts to provide additional resources to assist them in meet their Perkins performance goals that OSSE has established for the PY 2016-17 school year, as well as to ensure greater equity among all Perkins funded CTE programs in the District.

The OSSE has made a concerted effort to reduce the level of carryover by expending a substantial portion of its section 112 (a)(1) flow through funds, section 112 (a)(2) State leadership funds, and section 112 (a)(3) State administration funds during the first twelve months of grant availability.

The DC City Council has demonstrated a significant financial commitment to CTE with annual State appropriations for secondary CTE programs.

### ***Findings:***

*Finding #1:* The OSSE failed to submit financial status reports that were complete, accurate, and reliable.

*Evidence:* This determination was made after an extensive review of the fiscal year (FY) 2013 Perkins final financial status report (FSR), OSSE's financial records, and conferring with appropriate OSSE personnel. During the review, OSSE was unable to reconcile expenditures that it reported on the FY 2013 final FSR (obligation period July 1, 2013 to September 30, 2015) to formula distribution funds for secondary recipients (row G, column 9 of the FSR) and other leadership activities (row O, column 9 of the FSR) to summary financial records provided by the OSSE staff. These financial records showed formula distribution funds for secondary recipients were under reported by \$19, 221.22 and other leadership activities were over reported by \$19,221.22.

*Relevant Legal Requirement:* 2 CFR 200.302 of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Final Rule (Uniform Guidance).

*Corrective Action Required:* The OSSE must provide accounting records to verify its formula distribution funds for secondary recipients and other leadership activities to support its final FSR



for its FY 2013 grant, which it submitted March 31, 2015. If the OSSE cannot verify its reported Federal expenditures for its FY 2013 grant with its existing accounting records, the OSSE must file an amended final FSR to reflect the non-Federal expenditures supported by its existing accounting records. The OSSE also must adopt and submit policies and procedures to ensure that its financial management system meets the standards required by § 2 CFR 200.302 in the Uniform Guidance. The OSSE must submit this documentation and FSRs to this office by close of business on Friday, December 30, 2016.

***Suggested Improvement Strategies:***

*Strategy #1:* The OSSE should consider adopting policies and procedures to clarify the secondary alternative formula allocation process that is currently being utilized. For example, the OSSE should consider referencing the actual elements that comprise the secondary and postsecondary formula (grades 9-12 free and reduced lunch enrollment data and grades 9-12 enrollment data) instead of the elements spelled out in section 131 of the Perkins IV law.

**B. Local Applications**

***Current Status:***

DC OSSE administers an electronic local application system based on its five-year plan and annual updates. The on-line/electronic local application process is designed to meet the intent of the Perkins legislation. The electronic local application simplifies facilitates local application planning by secondary and postsecondary grantees, by providing direction on the permissive uses of Federal funds for CTE, and requiring subrecipients to meet the assurances specified in Perkins IV. The DC OSSE uses an electronic local application system based on a local five-year plan with annual updates. The on-line/electronic local application review form contains a number of basic elements: required description, location, provided/not provided/notes sections that are included on the on-line form/document to provide a relevant review of local applications.

DC OSSE developed a rubric to evaluate its FY 2015 annual local applications against the requirements of section 134(b) of Perkins IV. In addition, the DC OSSE's online Electronic Grants Management System (EGMS), which manages Perkins budgets, change requests, and requests for reimbursement, can enable staff to drill down to the object code to determine how Perkins funds are actually spent. The online EGMS captures accounting categories such as salaries, equipment and supplies, etc.; and program categories (i.e., guidance, professional development, special populations, etc.). This financial system is a useful tool in linking the use of program funds (with breakdowns per *program* area) to performance results which enhances the State's ability to determine the local impact of student performance levels.

It is also important to note that DC OSSE developed a comprehensive monitoring process to evaluate all secondary and postsecondary recipients. This process includes a risk analysis rubric to determine which eligible recipients shall receive an on-site visit or desk audit. Secondary recipients are on a six-year, on-site review cycle, while postsecondary recipients primarily receive desk audits due to budget constraints. All reviews culminate with a comprehensive monitoring report that include findings, corrective actions, if any, and timeframes for the completion of corrective actions. Specifically, the DC OSSE developed the following two CTE

Policies and Procedures manuals: a) Guidance for Carl D. Perkins Grant Recipients 2014; and b) Guidance for Carl D. Perkins Grant Recipients 2012-2017.

***Findings:***

***Finding #1:*** The DC OSSE's online local application form failed to address several required elements in section 134 of the Perkins Act.

***Evidence:*** This determination was made after reviewing local applications submitted by the following schools: Youthbuild Public Charter School (PCS), Washington Math Science & Technology PCS, Friendship PCS, Maya Angela PCS, Integrated Design & Electronics Academy PCS, Ellington School of the Arts, McKinley Technology HS, H.D. Woodson HS, Cardozo HS, Phelps ACE HS, Columbia Heights Education Campus HS, Booker T. Washington HS, Wilson HS, Woodson HS and UDC-CC, as well as conferring with appropriate DC OSSE personnel.

It is important to note that the on-line local application form *failed* to require local recipients to describe how they will: (1) encourage career and technical education students to enroll in rigorous and challenging academic subjects; (2) assure that career and technical education students are taught to the same academic standards as all other students; (3) provide programs that enable special populations to meet local adjusted levels of performance; (4) provide activities to prepare special populations for high skill, high wage, or high demand occupations; (5) provide opportunities for students in non-traditional programs; (6) ensure special populations will not be discriminated against; (7) identify and adopt strategies to overcome barriers for special populations; (8) provide programs that enable special populations to meet local adjusted levels of performance; and (9) support career guidance and academic counselors, including individuals in groups underrepresented in the teaching profession.

***Relevant Sections of the Legislation:*** Sections 134(b)(1), 134(b)(2), 134(b)(3)(A-E), 134(b)(5), 134(b)(7), 134(b)(8)(A-C), 134(b)(9), 134(b)(10), 134(b)(11), and 134(b)(12)(A-B).

***Corrective Action Required:*** The DC OSSE must revise and submit to this office for review its on-line secondary and postsecondary local application form(s) to address each of the required elements of section 134 of Perkins IV. The revised on-line electronic local application form must be used as the basis for the allocation of funds to both local and postsecondary eligible recipients for FY 2017 beginning July 1, 2017.

***Suggested Improvement Strategies:***

***Strategy #1:*** DC OSSE should consider refining its definition of "size, scope, and quality" for approved programs, services, and activities, for example, with "size" predicated on a minimum student participation level, "scope" tied more closely with the concept of "programs of study," and "quality" connected to placement or graduation rates.



## C. Program of Study

### *Current Status:*

DC OSSE's Division of Postsecondary and Career Education provides 34 CTE programs within 11 career clusters. These programs are offered via the State's Perkins secondary and postsecondary subrecipients within 20 high schools and public charter schools, the Education Services of Greater Washington, and the University of the District of Columbia-Community College (UDC-CC). The State is in the midst of implementing a comprehensive district-wide CTE strategic plan. This plan is composed of seven strategies that are poised to improve CTE within the District of Columbia by 2017. It provides non-regulatory guidance for LEAs to use to measure the alignment of their Perkins funded CTE Programs with the CTE Strategic Plan indicators.

The plan strives to ensure that 80% of the students within the District complete a CTE program of study that leads to an industry-recognized certification or credential with the District's most promising occupations. It identifies 12 priority career sectors within the District. The State is in the process of developing example frameworks of CTE POS for each of the POSs within the state's identified career clusters and promising occupations. These frameworks are estimated to be completed and made fully available to State's local education agencies (LEAs) for the 2017-18 school year.

The DC OSSE has recognized policies and guidelines that their LEAs and postsecondary institutions must follow in order to apply for State approval of CTE programs. DC OSSE's website provides online resources that depict a listing of the State's LEAs that offer CTE programs within the identified career pathways. DC OSSE uses the EGMS for the Perkins local applications and provides LEAs with the opportunity to submit their local application information for their CTE programs. This online system was intended to provide secondary and postsecondary eligible recipients a mechanism for which they could demonstrate alignment of their CTE program delivery pursuant Perkins legislation. DC OSSE is also responsible for approving CTE POS administered by Perkins secondary and postsecondary eligible recipients.

DC OSSE also assesses the Perkins LEAs using the State's Career and Technical Education Comprehensive Monitoring Tool. For example, this tool reviews the LEAs in 12 program quality areas that include curriculum, instruction, assessments, postsecondary connections, industry connections, career awareness, special education, special populations, financial administration, equipment and inventory management, expenditures, and time and effort. However, DC OSSE could not provide documentation of having provided their secondary and postsecondary eligible recipients with at least two POS pursuant to Perkins that could be adopted by the LEAs and postsecondary institutions to be offered as an option to students when planning for and completing future coursework.

The District of Columbia Public Schools (DCPS), one of the District's largest (LEA), offers 21 CTE and National Academy Foundation (NAF) Programs. There are 14 NAF career academies at six (6) DCPS schools. DC OSSE also has CTE programs at two District of Columbia Public Charter Schools (DCPCS). These academies prepare students in engineering, hospitality and information technology.



In addition to reviewing documents at the State, monitoring personnel conducted on-site visits to the nine eligible subrecipients: Six DCPS Schools (Wilson HS, Dunbar HS, Chesterfield HS, Ballou H.S. and Ballou STAY) and three public charter schools (Youthbuild, Friendship Tech Prep and Friendship Collegiate). Monitoring personnel also met with representatives from UDC-CC. Each subrecipient discussed their CTE programs and how they provided beneficial outcomes for students. Students were being provided with CTE experiential learning opportunities that utilized community partners who made contributions to the CTE programs monitored. The UDC-CC had partnerships with each of the sites visited and provided opportunities for CTE students to earn postsecondary credits and credentials. During these visits, monitoring personnel met with school and district administrators, staff, parents, and students, all of whom were familiar with both career pathways and POS; however, *none* of the eligible recipients were able to produce any evidence of offering at least one POS pursuant to Perkins IV.

### ***Findings:***

*Finding #1:* DC OSSE failed to provide documentation that it has established at least one career and technical programs of study (POS) that may be adopted by LEAs and postsecondary institutions to be offered as an option to students (and their parents as appropriate) when planning for and completing future coursework.

*Evidence:* This determination was made after reviewing State-level documentation pertaining to POS and interviewing state staff.

*Relevant Sections of Legislation:* Section 122(c)(1)(A)(i-iv)

*Corrective Action Required:* BDC OSSE must develop or adopt at least *one* career and technical POS that meet the requirements of section 122(c)(1)(A)(i-iv) of Perkins IV. Following development/adoption of at least two POS, the State must submit the POS to OCTAE and provide evidence that it has disseminated the POS to all LEAs and postsecondary institutions, either by posting the POS to the State's CTE website or by other means of dissemination. The required elements of a POS must be in place July 1, 2017.

*Finding #2:* Both DC OSSE and the STATE failed to ensure that each subrecipient offered at least POS pursuant to Perkins IV.

*Evidence:* This determination was made after conducting on-site reviews, interviewing key staff, and reviewing "state"-level and local-level documentation pertaining to POS.

*Relevant Sections of Legislation:* Section 134(b)(3)(A) and 135(b)(2)

*Corrective Action Required:* Both DC OSSE must revise its local application(s) and accompanying instructions to conform to the requirements of section 134(b)(3)(A) and Section 122(c)(1)(A)(i-iv) of Perkins IV. DC OSSE and the STATE must submit its revised local application(s) and accompanying instructions to OCTAE before the next allocation of federal Perkins funds to eligible recipients after July 1, 2017.

DC OSSE must revise its Perkins subrecipient monitoring instruments and guidelines to ensure that subrecipients continue to offer *at least one POS* in accordance with their approved online



local application form. This form must be submitted to this office by close of business on Friday, March 17, 2017. Following the allocation of federal Perkins funds to eligible recipients after July 1, 2017, DC OSSE must submit a random set of approved secondary and postsecondary annual applications to OCTAE as evidence that *each* subrecipient offers at least one POS.

***Suggested Improvement Strategies:***

*Strategy #1:* The funded subrecipients' applications failed to address the requirements of section 134(b) and were not consistent in how they were completed and implemented. A formal/standardized process should be developed to determine whether a subrecipient was compliant with section 134(b). In addition, DC OSSE should also consider conducting a complete review of POS documents and follow-up corrective actions regarding any non-compliance issues. A review of this nature may include an annual assessment of both secondary and postsecondary subrecipients' implementation of a POS pursuant to Perkins IV. This could be accomplished by adding questions regarding POS implementation to the revised annual local application and to the onsite monitoring instruments.

*Strategy #2:* DC OSSE should consider revising the Perkins local plan to require eligible recipients to upload at least one approved POS template or to list their approved program(s) of study, and to identify their secondary or postsecondary partner(s) in the POS via the EGMS. Doing so would make it easier for District staff to determine that all Perkins eligible recipients have met the requirement for offering *not less than one POS* and allow Perkins POS documentation to be accessed with the local plan.

*Strategy #3:* DC OSSE should consider providing professional development activities and technical assistance, with a particular focus on the joint secondary–postsecondary POS planning, course sequencing, and alignment based on the career and technical education programs of study frameworks that are currently being developed. It is important to note that the DC OSSE developed a POS Framework (currently in template form) could become a useful and effective tool; particularly if both secondary and postsecondary subrecipients implement this form collaboratively.

*Strategy #4:* DC OSSE's subrecipient, DCPS, utilizes an online academic and career guidance platform to track and record student achievement and progress. DC OSSE should consider collaborating with DCPS and the UDC-CC via technical assistance initiatives in an effort to streamline and align POS. In addition, DCPS could incorporate a POS theme into their professional development and training opportunities for guidance and career counseling staff using the online academic and career guidance platform. Moreover, DC OSSE could develop and host technical assistance webinars that emphasize the importance of joint secondary-postsecondary planning, course sequencing, and alignment within the subrecipients' student data systems.

*Strategy #5:* DC OSSE should consider working with DCPS to enhance the online academic and career guidance platform so that it is more intuitive and beneficial for student users as it is now primarily designed to be used by local and district-level staff.



*Strategy #6:* DC OSSE should re-evaluate the utility and currency of established POS articulation agreements. It appears that some of these agreements were fashioned under Title II, Tech Prep and have remained intact or expired with no significant modifications since. Given the emergence of performance results for planning purposes, and the prevalence of dual enrollment and dual credit opportunities for POS students, articulation agreements should embody considerably more facets of postsecondary and secondary POS components aligned with the CTE programming in DC. As the District looks to enhance various programmatic components of its CTE POS program; it could consider not only expanding its program of dual and articulated credits for secondary students, but the DC OSSE should also develop district-wide (and multistate) articulation agreements to increase the portability of credits earned by CTE POS students who later attend postsecondary institutions throughout the Washington, DC metropolitan area.

*Strategy #7:* DC OSSE should consider reviewing its alternative programs to ensure they meet the allowed use of funds legislation set forth by Perkins IV. We also recommend that DC OSSE conduct a thorough review of the Youthbuild and Ballou STAY programs regarding how CTE instruction and services are being administered.

#### **D. Accountability**

##### ***Current Status:***

The DC OSSE failed to meet seven (7) of the fourteen State-adjusted performance levels at the time of submission of its December 31, 2015, Consolidated Annual Report (CAR), covering FY 2014-15. In addition, it failed to meet the following two indicators: secondary academic attainment in reading/language arts (1S1) and postsecondary student retention (3P1) by the 90 percent threshold allowable under the Act and, therefore, was required to implement a program improvement plan pursuant to section 123(a)(1) of Perkins IV. See Table I. Finally, it is important to note that DC OSSE stipulated that *no* revisions were required for performance levels, definitions, or measurement approaches for PY 2014-15.

Secondary data is reported by LEAs through the District Student Identification System (DSIS). Post-secondary institutions use site-based data systems for maintaining and submitting data to the DC OSSE. It is important to note that the Office of Career and Technical Education hosts annual data conferences that provide training to local education agencies (LEAs) personnel regarding data management, ensuring accurate reporting of data, and data submission.

In PY 2014-15, the DC OSSE worked to ensure the accuracy of data contained in the District Student Information System (DSIS) by conducting training workshops to provide technical assistance and instruction to school district personnel on CTE data elements in the DSIS. The workshops addressed the importance of data quality when evaluating and describing program performance.

The data collected in the DSIS is linked to the District's Longitudinal Data Systems (SLDS). The SLDS has been designed to permit State offices, schools, and other stakeholders make data-informed decisions to improve student learning and outcomes. This data system not only permits the District to evaluate the CTE program, but assists the LEAs in prioritizing resources to improve delivery of training to enrolled students. This SLDS is a significant improvement over



the previous STARS system and has helped advance and expand the District's K-12. Similarly, the postsecondary data system has assisted in collecting longitudinal data on P-20W CTE students and programs. The postsecondary data system is especially noteworthy because until the District instituted its “Community College” program within the UDC system, the tracking of individual CTE students was laborious and unreliable. Now, the postsecondary data system can return valid and reliable data on postsecondary CTE students.

**TABLE 1**  
**PERFORMANCE LEVELS AND ACTUAL PERFORMANCE:**  
**Program Year 2014-15**

<b>Indicator Code</b>	<b>Indicator</b>	<b>Grand Total Student Numerator</b>	<b>Grand Total Student Denominator</b>	<b>Grand Total Performance Levels</b>	<b>Grand Total Actual Performance</b>  * Failed to meet performance level  **Failed to meet performance level by the 90% threshold
<b>SECONDARY LEVEL</b>					
1S1	Academic Attainment Reading/Language Arts	21,229	27,872	93.00%	76.17%**
1S2	Academic Attainment Mathematics	5,956	9,247	65.00%	64.41%*
2S1	Technical Skill Attainment	21,702	37,339	42.00%	58.12%
3S1	Secondary School Completion	43,401	43,886	95.00%	98.89%
4S1	Student Graduation Rate	42,810	45,124	92.50%	94.87%
5S1	Secondary Placement (postsecondary, employment, military)	37,055	37,283	75.00%	99.39%
6S1	Nontraditional Participation	28,754	154,076	19.20%	18.66%*
6S2	Nontraditional Completion	2,371	14,208	18.00%	16.69%*
<b>POSTSECONDARY LEVEL</b>					
1P1	Technical Skill Attainment	66,734	81,601	79.25%	81.78%
2P1	Credential, Certificate or Degree	31,517	59,352	46.25%	53.10%
3P1	Student Retention or Transfer	3,970	8,683	51.10%	45.72%**



Indicator Code	Indicator	Grand Total Student Numerator	Grand Total Student Denominator	Grand Total Performance Levels	Grand Total Actual Performance  * Failed to meet performance level  **Failed to meet performance level by the 90% threshold
4P1	Student Placement (apprenticeship, employment, military)	29,505	29,927	98.25%	98.59%
5P1	Nontraditional Participation	11,354	70,797	17.65%	16.04%*
5P2	Nontraditional Completion	3,174	24,511	13.29%	12.95%*

**Findings:**

No findings were noted.

**Suggested Improvement Strategies:**

*Strategy #1:* DC OSSE should consider developing a comprehensive set of written data analysis rules regarding the *collection* of student and program performance data and information. Although DC OSSE has developed a data reporting manual for its CTE programs, the manual does not discuss how data should be incorporated into final reports as well as how data can be used to develop corrective actions in response to performance shortfalls.

*Strategy #2:* DC OSSE should consider undertaking more regular analysis of disaggregated data to identify and quantify disparities in student outcomes. This information could be used as a basis for statewide technical assistance and special initiatives designed to address performance shortfalls. Additionally, the DC OSSE should consider strengthening the relationship between data programmers and program staff to improve efficiency and service to districts.

*Strategy #3:* DC OSSE should consider refining the local improvement plan template in order to capture useful information from local recipients (e.g. timeline for completion of strategies and initiatives, responsible persons for implementation of initiatives, benchmarks, and strategies to evaluate progress). An improved local improvement plan should also note performance targets for each indicator and actual performance data. By allowing subrecipients to address *indicator performance* rather than program category performance, the District may enhance its evaluation of LEA progress.

*Strategy #4:* DC OSSE should consider creating an automated system that links the local application, local improvement plans, and local annual reports. An integrated automated system can automatically populate performance data into a local improvement plans, annual reports and local applications on the updated online EGMS. The integrated automated system would allow

for a more seamless transition of information and significantly increase the accuracy, validity and reliability of collected data.

*Strategy #5:* DC OSSE should consider creating a budget matrix to help local recipients and State officials track and link expenses to performance data. This effort would enable an evaluation of how Perkins resources are used to fund activities and initiatives directly linked to performance shortfalls. Moreover, it may also prove to be useful in monitoring program initiatives and overall local recipient performance.