



DISTRICT OF COLUMBIA
OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

Summary & Responses to Public Engagement Feedback on ESSA Consolidated Plan

March 14, 2017

Process

As required by the Every Student Succeeds Act (ESSA), the District of Columbia must develop a state plan that outlines how it will comply with certain provisions in the law. The Office of the State Superintendent (OSSE) is charged with developing the ESSA state plan for DC. OSSE has facilitated a thorough and transparent process while designing the plan, and engaged a diverse group of education stakeholders. Since December 2015, OSSE has participated in over 70 meetings and gatherings to solicit stakeholder feedback and public comment on the plan. OSSE has received the feedback of more than 110 LEAs, government agencies, consortia, and other organizations in the District of Columbia. OSSE has worked closely with the State Board of Education throughout the design and development phases of the process. Resources, updates, and meeting recaps for these activities may be found on OSSE's website at osse.dc.gov/essa.

The public comment period on the ESSA State Plan lasted from Jan. 30 to March 3, 2017. At that time, the public could review the state plan in its entirety on both the State Board of Education and OSSE websites. In addition, the public could participate in a survey that gauged public reactions to the plan, and the public could submit their own written comments. As of March 3, OSSE received more than 250 written comments. Finally, OSSE and the State Board of Education hosted a series of community-based meetings in each ward in February 2017. At that time, OSSE presented the proposed ESSA consolidated plan and provided the public the opportunity to express comments and ask questions.

The purpose of this document is to summarize the comments received throughout the public comment period, and the decisions made in the updated state plan based on that feedback. This is not a comprehensive list of every comment received through the survey, the comment email box, and the public engagement forums; however, it consolidates major pieces of feedback that were consistently heard throughout. The majority of the feedback from the public came in response to the state's proposed accountability plan. In this document, OSSE provides a brief description of the relevant provisions of the draft state plan as released on Jan. 30, a brief reaction to the feedback that it received and as applicable, a summary of the revisions made to the state plan in response to the public comments. OSSE will also be releasing a fully revised version of the consolidated state plan by March 15, at osse.dc.gov/essa.

Feedback Summary & Proposed Changes

Weighting of Domains within Accountability Frameworks

Draft State Plan (as released on Jan. 30): The draft state plan proposed weighting the domains within each framework as follows: academic achievement at 40 percent, academic progress at 40 percent, school environment at 15 percent, and English language proficiency at 5 percent for the elementary and middle school accountability frameworks. The high school framework was weighted in a slightly different manner. For high school, academic achievement is weighted at 50 percent, school environment at 25 percent, English language proficiency at 5 percent, and graduation rates at 20 percent.

Feedback: OSSE received a wide range of feedback on the appropriate weight placed on academic achievement, growth, and school environment. Many commenters expressed concern that students are tested too much and/or that schools place too much emphasis on tests, and said therefore, OSSE should

weight testing, as a whole, at the minimum level allowed under federal regulations. Numerous commenters believed that the state plan placed too much weight on academic achievement and that both growth and school environment should be weighted more. Finally, some commenters believed that college and career readiness is critical, and achievement scores are appropriately weighted or should even be weighted more.

OSSE Response: OSSE appreciates the significant amount of public engagement on the role that academic achievement, growth, and school environment play in determining school quality. OSSE is sensitive to the concern that the public expressed on the role of testing and how it impacts instructional time. OSSE also believes that quantifiable measures of outcomes are an important part of determining school quality, so there is a role for assessment in determining school quality. Further, ESSA outlines a minimum testing requirement; federal law requires that students are assessed annually in math and reading in grades 3-8 and at least once in grades 9-12. Federal law requires science assessments to be administered at least one time during grades 3-5, 6-9, and 10-12.¹ The District of Columbia meets the federal testing mandate and does not exceed it. Finally, OSSE believes that the accountability system should push schools to make progress with all students while accelerating progress for students who are farthest behind; therefore, emphasizing growth over achievement is consistent with those values.

In response to feedback, OSSE is making the following revisions to the ESSA state plan:

- In the elementary and middle school frameworks, lower the weight on academic achievement from 40 percent to 30 percent. Growth weight will remain at 40 percent.
- No change to the high school weighting for academic achievement (please see section “High School Growth” below for further details).
- In the elementary and middle school frameworks, increase the school environment domain by 10 points. School environment will increase from 15 percent of a school’s total score to 25 percent of a school’s total score.

Measuring School Environment

Draft State Plan (as released on Jan. 30): In the proposed plan, OSSE weighted school environment as 15 percent of a school’s rating in the Middle School framework. That 15 percent was further divided as follows: 7.5 percent for 90 percent plus attendance, 3.75 percent for in seat attendance, and 3.75 percent for re-enrollment. For schools with pre-K grades, school environment was weighted at 15 percent and further divided as follows: 7.5 percent for 90 percent plus attendance, 3.75 percent for in seat attendance, 3.75 percent for re-enrollment, and then a proportional weight (to be taken from the other measures) would be assigned to the CLASS instrument, based on the proportion of pre-K enrollment at the school. In the high school framework, school environment was weighted at 25 percent and was broken down as follows: 12.5 percent for 90 percent plus attendance, 6.25 percent for in seat attendance, and 6.25 percent for re-enrollment. OSSE also described ongoing work related to school climate surveys, and committed to an additional pilot on school climate for purposes of accountability as well as exploring additional measures over time.

¹ Every Student Succeeds Act, Section 1111(b)

Feedback: Many commenters were interested in the use of school environment metrics and believed they are important indicators of school quality. As mentioned earlier, many commenters believed that the accountability plan should weight school environment factors higher than proposed. Commenters expressed some additional metrics of interest that would gauge the quality of the school environment: discipline data, data on teacher attendance or retention, school climate surveys for both parents and students, and expanding the use of the CLASS instrument beyond pre-K. A number of commenters expressed concern about the narrowing of the curriculum to only math and language arts, and expressed the need for a metric that measures access to other subjects such as science, foreign language, social studies/civics, physical education, and STEM courses. A few commenters believed that attendance and re-enrollment are not measures of school environment metric, and that these measures may penalize schools that serve a greater number of at-risk students. Some commenters also asked about how attendance measures would be calculated for pre-K students, since compulsory attendance begins in Kindergarten.

OSSE Response: OSSE agrees that the environment within a school is relevant and related to the teaching and learning that happens within the building as well as the overall experience of students and families, and remains committed to exploring the inclusion and appropriateness of other metrics. As noted above, OSSE has already committed to a climate survey pilot program, but believes that surveys are not yet ripe for inclusion in the accountability system in its first year of implementation. Fully implementing a school climate survey in the 2017-18 school year for the accountability ratings released in the fall of 2018 would be a daunting task not only for OSSE, but for LEAs and schools. Many experts on school climate surveys have also expressed caution about potential ramifications to using school climate surveys for the purposes of accountability, and recommended their use be piloted and evaluated carefully and thoughtfully. OSSE also believes that attendance and re-enrollment serve as proxy measures for satisfaction with a school—higher attendance rates can indicate that students are more engaged in their education, and higher re-enrollment rates may indicate parent and student satisfaction with a school. In addition, a variation on the attendance metrics further gives schools opportunities to show their impact and progress in engaging students (see the section on Attendance Metrics below). Finally, OSSE strongly agrees that a rich and well-rounded curriculum are foundational for student learning, and that students should have access to a wide range of opportunities. We also believe that schools pursue these broader opportunities in varied ways and we should provide recognize these multiple ways to demonstrate results in this area.

In response to feedback, OSSE is making the following revisions to the ESSA state plan:

- Include a new measure for access and opportunities in all frameworks for the school environment domain that is worth 5 points. This new measure will be designed to promote well-rounded experiences for students in engaging learning environments. Given that there are multiple ways to demonstrate a well-rounded education, this measure will also seek to provide flexible options for schools to highlight results in this area. This measure will be piloted in the 2018-19 school year, and used in formal accountability results for the 2019-20 school year.
- As noted above, increase the weight on school environment to 25 points from 15 points in the draft plan, for elementary and middle schools.
- Clarify how pre-K measures are incorporated, including calculating in-seat attendance separately for pre-K students as opposed to those in other grades.

Attendance Metrics

Draft State Plan (as released on Jan. 30): The proposed state plan included two measures of attendance as part of the school environment domain—the percentage of students who are present 90 percent or more of the school year (“90 percent plus attendance”) and in-seat attendance. In the elementary and middle school frameworks, 90 percent plus attendance received 7.5 points out of a total of 15 for school environment and in seat attendance received 3.75 points out of a total of 15 for school environment. In the high school framework, 90 percent plus attendance was worth 12.5 points of a total of 25 points for school environment and in seat attendance was worth 6.25 points out of a total of 25 points for school environment.

Feedback: Some commenters expressed concern that in-seat attendance and 90 percent plus attendance measures would not recognize schools that did not yet have strong attendance rates, but were making progress on improving them. Again, some commenters expressed that attendance measures could penalize schools that serve the most disadvantaged students. OSSE heard concerns questions about attendance processes and policies and how they may differ across schools and sectors. OSSE also heard questions and concerns regarding the level of control and influence a school has on a student’s attendance.

OSSE Response: Students must be present in school to learn, and a growing body of research demonstrates the strong link between attendance and student learning at all levels of schooling. Further, students who are chronically absent (or are not in school at least 90 percent of school days) are at risk for diminished learning outcomes across grade level.² As a result, OSSE believes that clearly reporting on the extent to which students are accessing 90 percent or more of instructional time is important. OSSE also believes that it is critical to learn from those schools doing well and making gains in this area. OSSE understands that there are many factors that may impact a student’s attendance, but we also believe schools play an important role in engaging children and their families, and that this engagement has an impact on attendance rates. OSSE acknowledges that schools are doing significant work already to encourage stronger attendance, and believes that those improvements should be highlighted and celebrated.

In response to feedback, OSSE is making the following revisions to the ESSA state plan:

- Add a measure of growth in 90 percent plus attendance to give credit to schools who are improving students’ rates of attendance.
- Update the 90 percent plus attendance metric to the best of two options – Option 1: the percent of students present 90 plus or more of the school year **or** Option 2: the growth in percent of students present 90 percent or more of the school year as compared with last year.

Graduation Rate Metrics

Draft State Plan (as released on Jan. 30): In the high school framework, graduation rate comprised 20 percent of a high school’s total score. Graduation rate was divided into three categories: four year

² OSSE references these specific academic studies related to attendance on page 41 of the state plan.

graduation rate was worth 10 points, five year graduation rate was worth six points, and alternate graduation metric was worth four points.

Feedback: Commenters generally expressed support for the inclusion of any measure that gives schools credit even if it takes longer than four years. Some commenters expressed that the proposed accountability system was complex and that metrics should be better streamlined.

OSSE Response: OSSE is pleased that the new accountability system will be able to include graduation metrics that incorporate students that take longer to graduate. This is consistent with the values behind the accountability system; schools should always have the incentive to work with every child to achieve college and career readiness. On simplification, OSSE acknowledges that the proposed system is complex; however, it is important for a system to be comprehensive and to give credit for school quality in multiple dimensions. OSSE agreed that it is important to streamline metrics with the goal of simplifying wherever possible, and the five year graduate rate and alternative graduation metric are an example where that streamlining can take place, since five-year graduates are encompassed within the alternative graduation metric.

In response to feedback, OSSE is making the following revisions to the ESSA state plan:

- Remove the five year graduation rate as a separate metric in the high school framework.
- Increase the weight for the alternate graduation metric from four points to nine points.

High School Growth

Draft State Plan (as released on Jan. 30): The proposed accountability framework for high schools does not include a growth measure, for technical reasons.

Feedback: Many commenters expressed their belief that growth should be included as a measure of quality for high schools.

OSSE Response: OSSE fully agrees with the public that the accountability system should include growth for high school. OSSE commits to exploring the implementation of a growth measure in the high school framework as soon as possible. The reason growth has not been included in the high school framework at this time is because we do not currently have enough years of testing data available, and because students' course-taking patterns, particularly in math, can vary considerably.

OSSE proposes no changes with regard to a high school growth measure at this time, but we remain fully committed to exploring all options for developing and implementing academic progress or growth measures for high schools in the future. OSSE pledges to report publicly on progress towards this goal by the 2018-19 school year.

Long-Term Goals

Draft State Plan (as released on Jan. 30): OSSE's goals are for the District of Columbia to be both the fastest-improving city and fastest improving state in the country. OSSE set ambitious, but feasible goals at the state level: 85 percent of all students will score at the college and career ready level as measured

on PARCC over the next 20 years, and we will work to cut the gaps in outcomes between different groups of students in half over the next ten years.

Feedback: One commenter expressed concern that the state plan set different proficiency goals over time for different subgroups of students; therefore, the state plan held students to different academic expectations. Some commenters expressed that the goals are set out too far into the future. Some commenters expressed concern or confusion about whether the statewide goals were reflected in the school accountability system.

OSSE Response: Our goal is to prepare all students for college, career, and life opportunities, and individual students are held to these same high standards regardless of their race, economic status, language, or disability status. The inclusion of statewide goals is a requirement of ESSA. The statewide goals we have set forth aim for faster rates of growth for the groups of students who have historically been furthest behind, so that we can narrow gaps and ensure progress for all students. In addition, the long-term, statewide goals are distinct from the school accountability framework, and we will update language to make that clarification clear and consistent throughout the state plan.

Recently Arrived English Learners

Draft State Plan (as released on Jan. 30): Federal law defines a “recently arrived” English learner (EL) as a student who has been enrolled in schools in the United States for less than 12 months. Federal law also provides specifically delineated options for recently arrived English learners and participation on state assessments. In our draft plan, we proposed using the option where recently arrived EL students (those who are first enrolled in U.S. schools within 12 months from the first day of the previous year’s test window) are exempt from taking the PARCC English language arts/literacy assessment, but are required to take PARCC Mathematics and DC Science in their first year.

Feedback: Several commenters expressed concern with requiring EL students to test in English language arts/literacy, Math, and Science so early. Some commenters suggested that EL students refrain from taking any assessments for the longest period allowed under federal law.

OSSE Response: Because at least 5 percent of the student population speaks Spanish, OSSE administers PARCC Math and DC Science in Spanish. Students have access to accommodations in other languages, though the full assessments are not translated fully into other languages besides English and Spanish.

OSSE agrees with the commenters that we should be thoughtful about assessments and results for English learners who are in the early stages of developing English language skills. Under federal law, OSSE has two options for recently arrived English learners in the state. The first option is to allow new arrivals to test in Math and Science, but not English language arts in their first year, as proposed in the draft plan. The second option is to test new arrivals in all three subjects but not count the results in English language arts in year 1. The English language arts score from year 1 would be used to calculate growth in Year 2. OSSE selected the first option, because we believe it would be unnecessarily burdensome to ask newcomer students to participate on the state English assessment. A one year waiver allows a minimum amount of time for a student to acquire some academic English and test-taking skills before being assessed.

STAR Rating System

Draft State Plan (as released on Jan. 30): Schools in DCPS and public charters schools will receive an annual rating on the School Transparency and Reporting (STAR) system, ranging from one star (lowest) to five stars (highest).

Feedback: Some commenters believed that the star rating was too simplistic, and were concerned that people would just care about the single rating and none of the underlying data behind that rating, and that this may mask specific areas of strength within a school. Some commenters noted that a single rating is helpful for parents and others who want to have more detail can look at additional data. Some commenters expressed the desire for a dashboard approach rather than a single rating when displaying school data. Some commenters expressed the desire for separate star ratings for proficiency and growth rather than having a single star rating overall. Several commenters believed that the star rating system would be harmful for schools that serve predominately low-income students, and as a result, it would encourage parents not to enroll in those schools. Many commenters believed that there should be one accountability system to evaluate the quality of all schools whether in DCPS or charters.

OSSE Response: OSSE strongly agrees that having a common accountability system for all schools across all LEAs and both DCPS and public charter schools would benefit families and educators. As a result, OSSE has collaborated extensively with DCPS, the Public Charter School Board, charter LEAs and many other stakeholders on the accountability system. We believe that an overall rating provides important clarity for parents and families, particularly when paired with a more comprehensive and detailed school report card. We agree that it's important to ensure this additional information is shared with families in an accessible and understandable way and will explore dashboards and other formats and layouts as part of the report card design process.

Submission Date

Draft State Plan (as released on Jan. 30): States have the option to submit consolidated state plans in either in April or September of 2017, and OSSE plans to submit the consolidated state plan to the US Department of Education in April 2017.

Feedback: Many commenters believed that OSSE should delay submission until September in order to allow for even more community feedback and engagement. Commenters believed that submitting in September may allow OSSE to explore some of the desired metrics for school environment including the use of student surveys. Commenters wanted a more defined explanation of how the state plan will be evaluated and adjusted throughout implementation and how stakeholders will be included in the review process.

OSSE Response: As outlined earlier, OSSE has consulted and engaged with a wide variety of stakeholders throughout the process of developing its state plan. Regardless of when states submit their plans, states must be ready to release results in the fall of 2018 using its accountability system and data collected in the 2017-18 school year. The US Department of Education has up to 120 days to review and approve state plans. The April submission will provide LEAs, schools, and stakeholders with clarity on how school quality will be measured at the start of the 2017-18 school year, the year that will be assessed when the first results are issued in fall 2018. Furthermore, it will allow OSSE and LEAs to focus on effective

implementation of the new system, allowing for clear, aligned understanding and accurate measurement and reporting from the beginning. Finally, OSSE does not believe that delay until September would allow for substantial progress towards inclusion of future metrics, and therefore would not be beneficial towards that goal.

OSSE will submit the plan to the US Department of Education in April pending State Board approval.

Summary of Proposed Changes to STAR Framework

- For elementary and middle schools: leave academic growth domain at 40 points, reduce academic achievement to 30 points
- Allocate the 10 additional points to School Environment domain (schools at all levels now have 25 points for this domain), with updated distribution within the domain as noted in the diagrams below.
- Develop new Access and Opportunities measure within the School Environment domain. This measure will be piloted in the 2018-19 school year, and used in formal accountability results for the 2019-20 school year.
- Rename the 90 percent+ attendance metric to Addressing Chronic Absenteeism and update it to be the “best of” either
 - o Percent of students present 90 percent or more of the school year (current metric), OR
 - o Growth in percent of students present 90 percent or more of the school year, as compared with last year.
- Remove the 5-year graduation rate as a separate measure, since it’s accounted for in the alternate graduation metric, and increase weight for alternate graduation metric

For additional details on each framework, please see Appendix A.

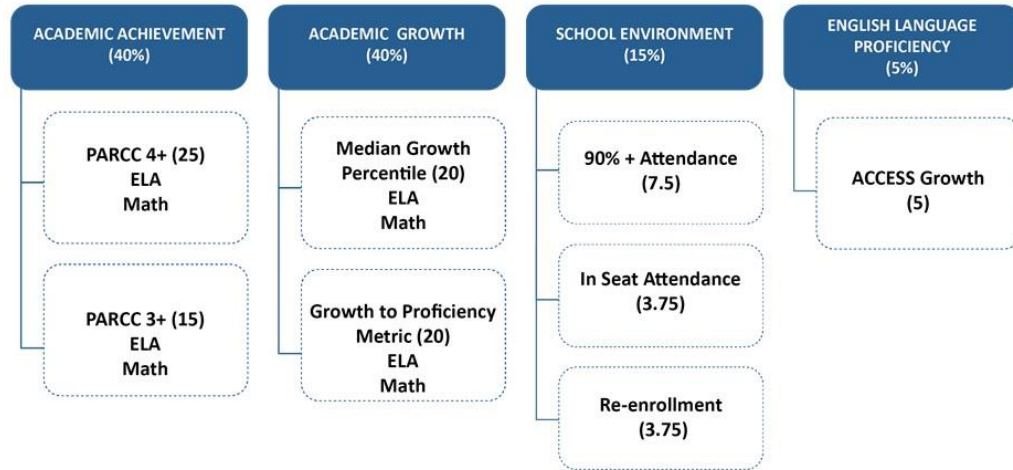
Conclusion

OSSE thanks the stakeholders that have reviewed and commented on our proposed plan. OSSE believes that the feedback gathered was constructive and helpful to making the state plan stronger. Public engagement is critical to our collective goals. OSSE hopes that this proposed plan will not only sustain, but accelerate and deepen the progress being made in our schools to support all of our students.

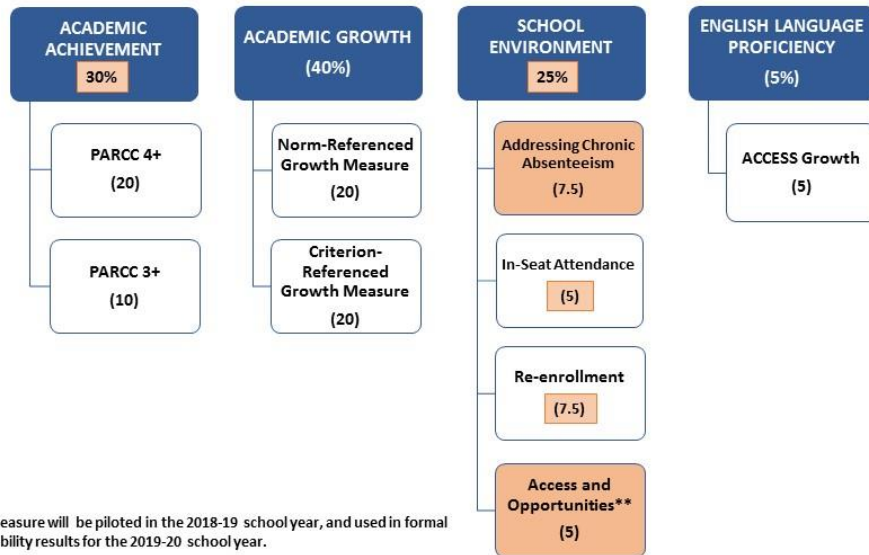
Appendix A: Changes by Framework

Highlighted areas show a change or addition from the Jan. 30 Draft State Plan.

Previous STAR Framework: Elementary Schools without Pre-Kindergarten

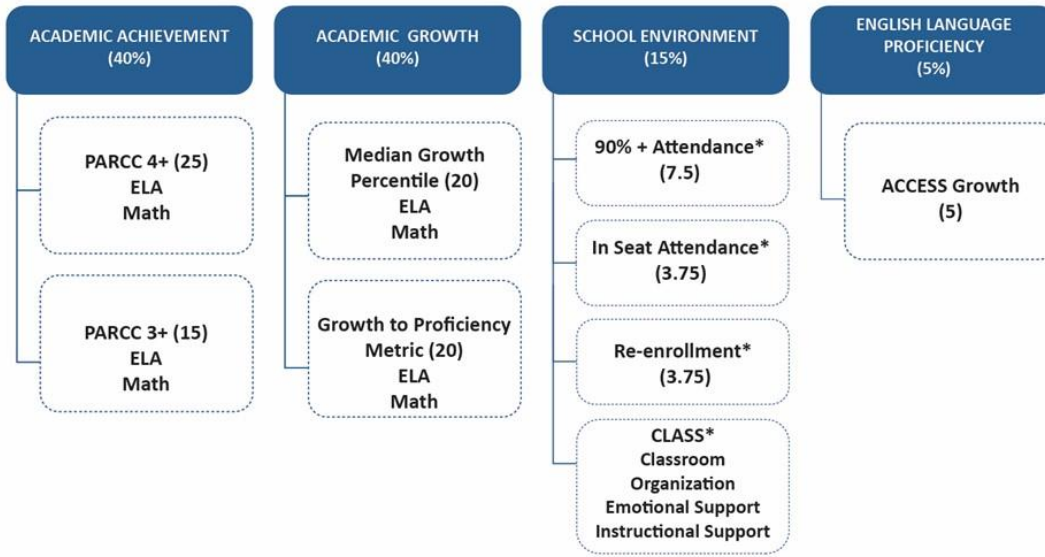


New STAR Framework: Elementary Schools without Pre-Kindergarten

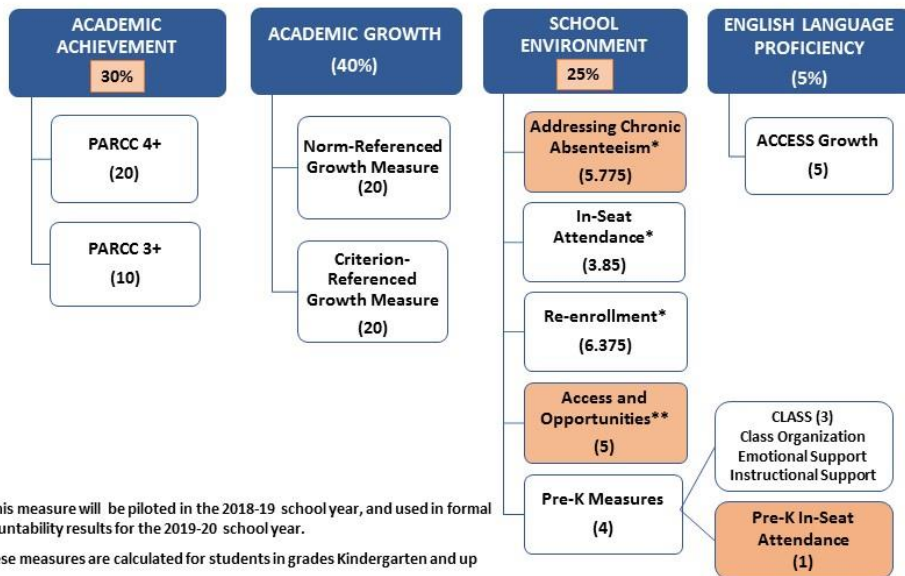


** This measure will be piloted in the 2018-19 school year, and used in formal accountability results for the 2019-20 school year.

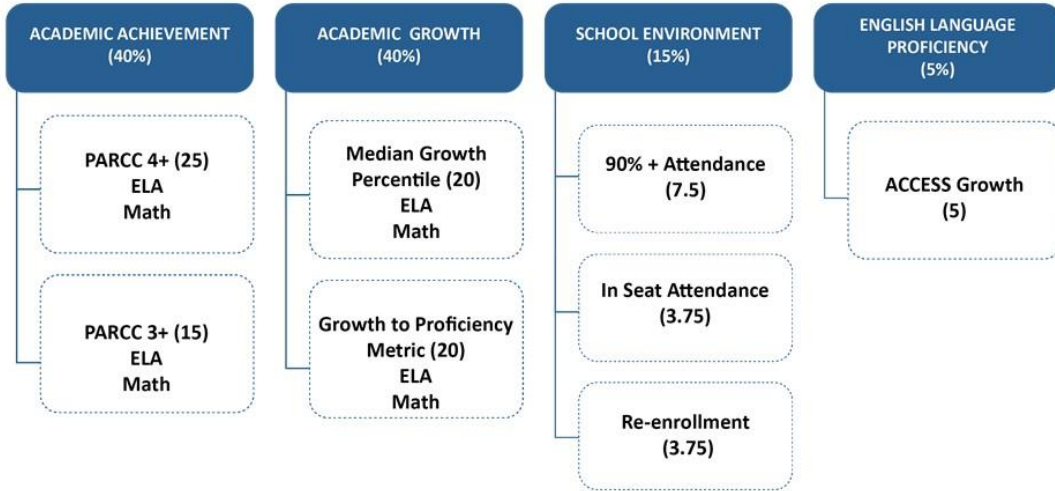
Previous STAR Framework: Elementary Schools with Pre-Kindergarten



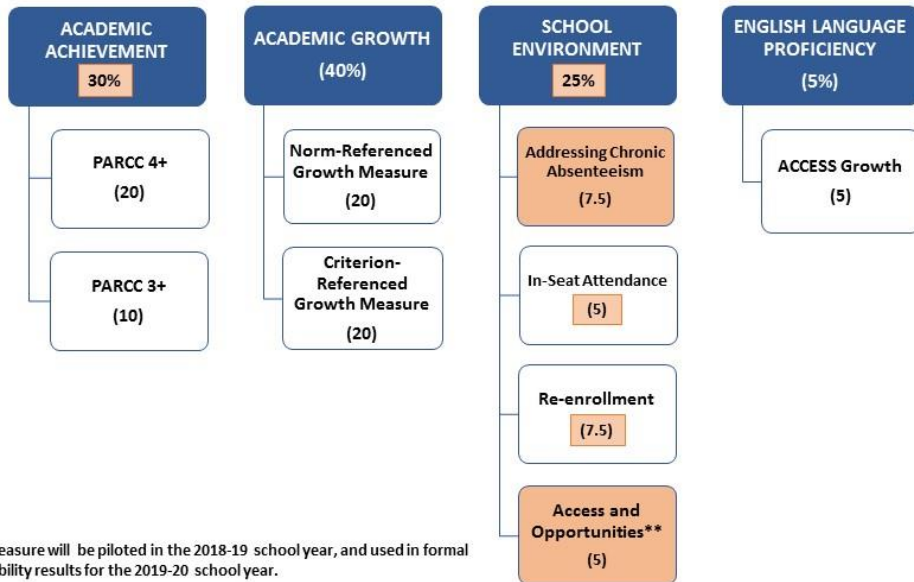
New STAR Framework: Elementary Schools with Pre-Kindergarten



Previous STAR Framework: Middle Schools

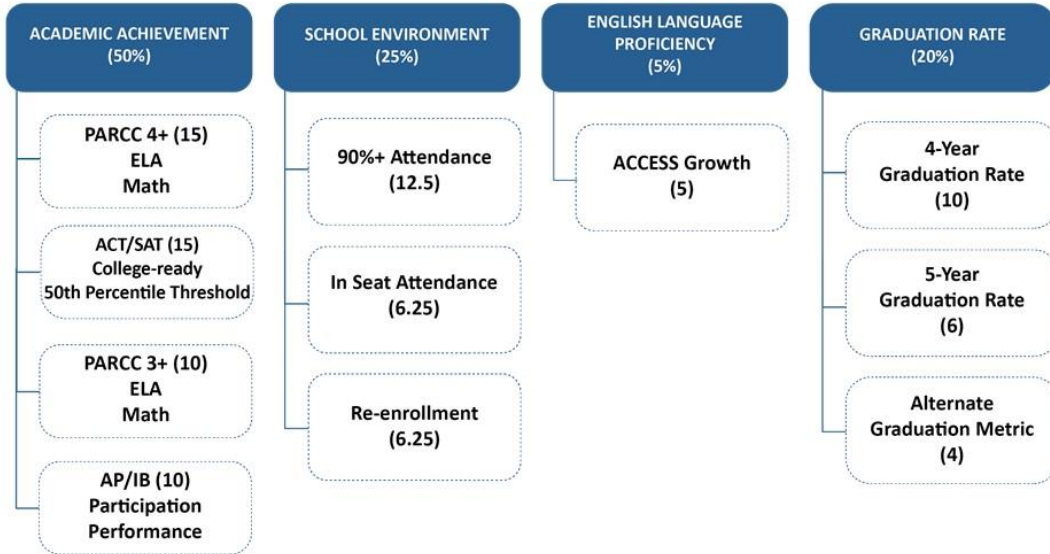


New STAR Framework: Middle Schools



** This measure will be piloted in the 2018-19 school year, and used in formal accountability results for the 2019-20 school year.

Previous STAR Framework: High Schools



New STAR Framework: High Schools

