



District of Columbia
Office of the State Superintendent of Education

Analysis of Attendance and Graduation Outcomes at Public High Schools in the District of Columbia

January 16, 2018

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REPORT CONTENTS

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EXECUTIVE SUMMARY

Background

On Tuesday, November 28, 2017, the WAMU radio station published the first in a series of three articles that alleged Ballou High School's administration graduated dozens of students despite high rates of unexcused absences.

On December 1, 2017, Mayor Muriel Bowser directed the Office of the State Superintendent of Education (OSSE) to conduct an analysis of student-level attendance and graduation outcomes at public high schools in the District of Columbia.^[1] Under this directive, OSSE has undertaken the following actions: review District of Columbia Public Schools (DCPS) graduation policies and practices, including a school-specific investigation of Ballou Senior High School (Ballou SHS); conduct a citywide analysis of student attendance and graduation outcomes for all District of Columbia (DC) high schools; and review DC Public Charter School Board (PCSB) oversight of its charter school graduation policies and procedures.

Investigative Process

OSSE has fulfilled its obligations to complete this multifaceted investigation using several methods:

- Citywide Attendance and Graduation Analysis – OSSE staff completed a quantitative analysis of citywide student data related to day-level attendance and graduation, based on school and student level data OSSE receives from Local Education Agencies (LEAs) for statewide reporting purposes.
- Public Charter School Board Oversight Analysis – OSSE staff completed an investigation into the PCSB's oversight of graduation outcomes in charter schools, including document review and interviews with PCSB staff.
- DCPS Investigation Including Ballou High School – OSSE contracted with the consulting firm Alvarez & Marsal (A&M) to conduct the investigation into DCPS's compliance with attendance and graduation policies. The investigation led by A&M included analysis of local regulations, DCPS policy issuance and implementation, and use of data systems, through data analysis, interviews, and document review. The complete preliminary report, containing analysis of the implementation of DCPS policies at Ballou High School, is included in this report. The final report, which will include analysis and investigation into all other DCPS high schools, will be completed at the end of January.

OSSE has undertaken this investigation to fulfill the goal of understanding the state of attendance and graduation in DC's high schools, and to better inform next steps for our schools and policy makers. The timeline for the investigation set forth by the Mayor underscored the importance of understanding any gaps in implementation from past years as soon as possible, in order to make necessary changes for currently enrolled students that will best support their educational outcomes.

^[1] Mayor's Memorandum 2017-3, dated December 1, 2017.

Summary of Findings

Citywide Attendance and Graduation Analysis

OSSE's analysis resulted in several findings, including:

- There is increasing incidence of students graduating despite missing a large proportion of instructional days at school. Between SY2014-15 and SY2016-17 absenteeism among students in their fourth year of high school rose, and more students with high levels of absenteeism were graduated over that period.
- There is overall a strong correlation between attendance and graduation – students are much more likely to graduate if they have better attendance.
- The distribution of absenteeism among graduates and non-graduates varies significantly by sector and school type:
 - Charter schools and DCPS selective high schools have lower levels of absenteeism, and lower levels of graduates with high absenteeism.
 - DCPS neighborhood schools have very high levels of absenteeism, and an increasing number of extremely-absent students have graduated in recent years.
- Patterns of attendance and graduation are not the same at every neighborhood high school. More examination at the school level could be helpful in identifying information about school and District level practices.
- Student mobility and at-risk status are associated with extremely high levels of absenteeism.

Public Charter School Board Oversight Analysis

OSSE's investigation resulted in several findings, including:

- In alignment with their own policy, the DC Public Charter School board certifies charter school graduates through an annual audit of 12th grade transcripts. This transcript audit process includes a review of student report cards, official transcripts, community service hour documentation, memoranda of understanding that explain to students and families the graduation status of students, school course catalogs, and other school-specific record keeping.
- Information related to graduation requirements at individual charter schools/LEAs is not consistently made publicly available in an accessible way
- PCSB current policies and procedures do not currently include a review of student attendance data to determine if schools comply with their own attendance policies to the extent they impact earning credits.
- PCSB policies and procedures do not currently include a review of school- or LEA-level policies related to credit recovery or other alternative opportunities to earn credit and compliance with these policies is not included in the 12th grade transcript audit process.

DCPS and Ballou Investigation

Alvarez & Marsal's investigation into the implementation of DCPS's policies for attendance and graduation at Ballou resulted in several findings, including:

- A pattern of graduating students with extreme numbers of course absences, in contradiction with DCPS policy;
- Incorrect or contradictory guidance from school officials on coding of absences;
- Implementation of grading policies not in compliance with DCPS policy;
- Inappropriate or excessive use of credit recovery for students, including implementation inconsistent with DCPS's stated policies;
- Pressure from administrators on teachers to provide opportunities to pass; and
- Inadequate training, tools and supports to enable effective implementation of DCPS systems, policies and procedures.

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Attendance and Graduation in Public Schools in the District of Columbia

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Introduction

On December 1, 2017, Mayor Muriel Bowser directed the Office of the State Superintendent of Education (OSSE) to conduct an analysis of student-level attendance and graduation outcomes at public high schools in the District of Columbia.¹ Under this directive, OSSE has undertaken the following actions: to review District of Columbia Public Schools (DCPS) graduation policies and practices, including a school-specific investigation of Ballou Senior High School (Ballou SHS); to conduct a citywide analysis of student attendance and graduation outcomes for all District of Columbia (DC) high schools; and to review DC Public Charter School Board (PCSB) oversight of charter school graduation and policies. This report contains findings related to the citywide analysis of student attendance and graduation outcomes for all DC high schools.

Though absenteeism is not a new problem, the findings of this report indicate increasing incidence of students graduating despite missing a large proportion of instructional days at school. The high levels of absenteeism among graduates observed at Ballou did not occur in isolation. Examination of attendance records among graduating cohorts across the District uncover the following key findings:

- The distribution of absenteeism among graduates and non-graduates varies significantly by sector and school type.
- High levels of absenteeism are observed across all years of high school; absenteeism is not solely concentrated among high school seniors. Students tend to accumulate more absences as they progress through high school, but there is not a dramatic increase in absenteeism for students in their fourth year.
- Day-by-day attendance patterns for graduates and non-graduates do not follow a similar trend.
- Student mobility is associated with extremely high levels of absenteeism.
- At-risk students, particularly homeless students, tend to have much more acute absenteeism than the general student population.

For the purposes of the analyses in this report to inform the investigation into attendance and graduation trends, student graduation cohort were used. For graduation cohorts, students are assigned a cohort based on the expected graduation year (i.e. their 4th year of high school); all graduates included in these analyses are on-time graduates. Therefore, the total number of graduates listed in this report may vary from total graduates (which could include 5th-year graduates or beyond in any given year), or other previously published graduation rate reporting.

Please see Appendix A for detail on the student populations, definitions, and data caveats which apply to this report.

¹ Mayor's Memorandum 2017-3, dated December 1, 2017.

Absenteeism among graduating cohorts of students

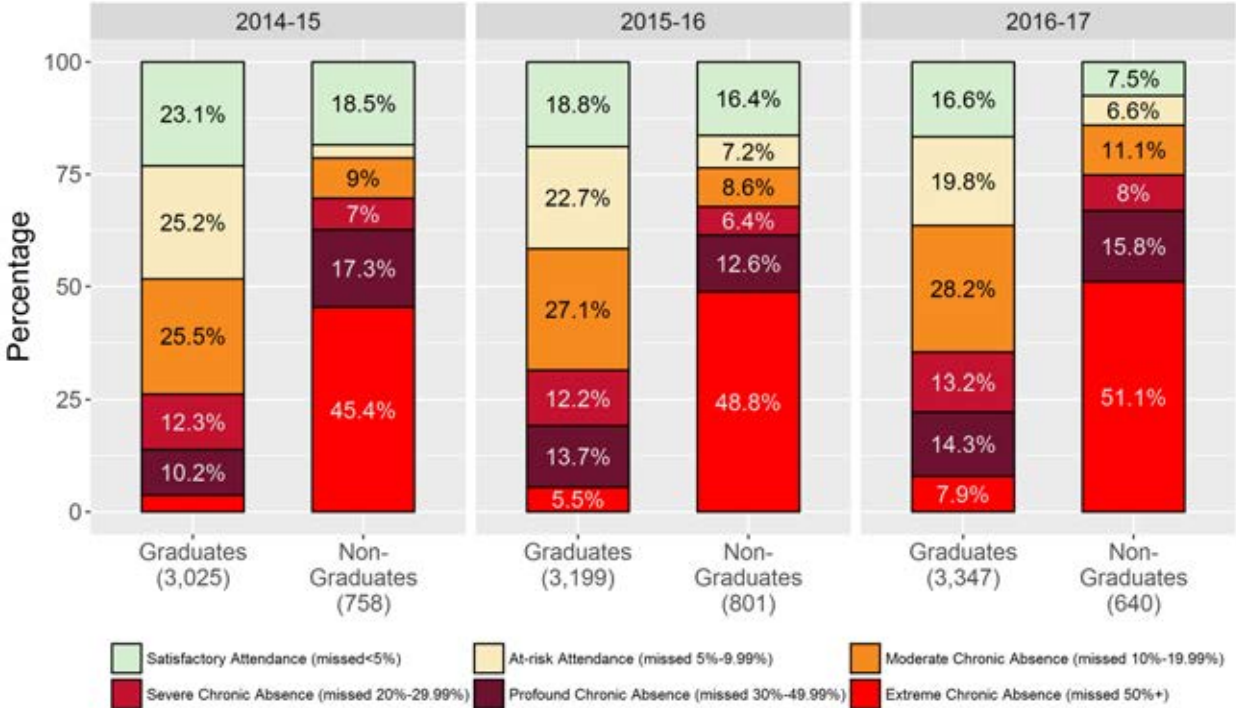
Historical Trends

Between the 2014-15 and 2016-17 school years² absenteeism among students in their fourth year of high school steadily increased, particularly at the highest levels of absenteeism (Figure 1). In the 2016-17 school year, 7.9% of graduates missed more than half of instructional days (extremely chronically absent), up from 3.7% in 2014-15. While the number of non-graduates has decreased over the past three years, the proportion of non-graduates who have missed more than half of instructional days at their graduating school has risen by five percentage points. More than half (51.1%) of non-graduates in 2016-17 were extremely chronically absent.

The proportion of graduates among profoundly chronically absent or extremely chronically absent students has increased significantly over the past three years (Figure 2). In 2016-17, 82.6% of the 579 students in their fourth year of high school who missed between 30%-49.99% of school graduated; 44.8% of the 592 students who missed more than 50% of school graduated. The graduation rate for students with extreme chronic absenteeism has increased by more than 20 percentage points between 2014-15 and 2016-17. The number of students graduating in spite of missing more than half of instructional days has more than doubled.

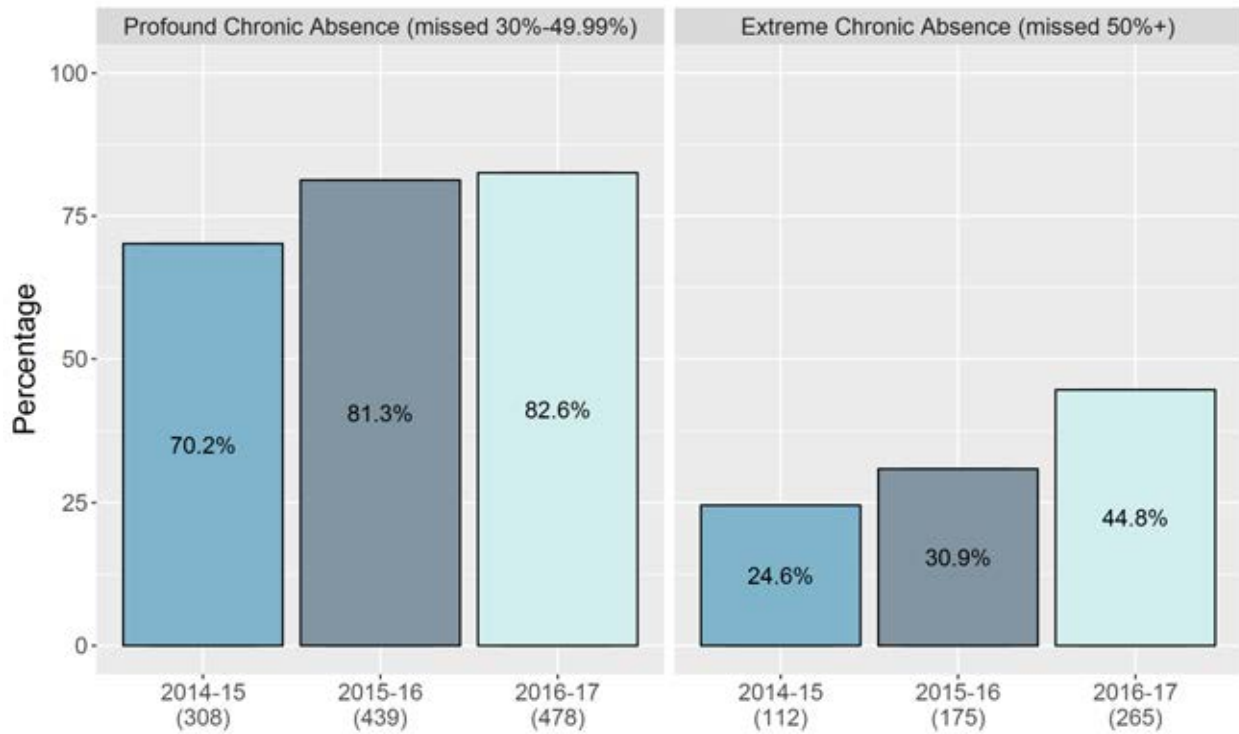
State-level

Figure 1: Absenteeism by Graduates and Non-Graduates



² The analysis in this section of the report examines data across three different cohorts -- students expected to graduate in the 2014-15, 2015-16 and 2016-17 school years.

Figure 2: Graduation Rates for Profoundly and Extremely Chronically Absent Students



Sector Analysis

DCPS

In 2016-17, 11.4% of graduates from D.C. Public Schools (DCPS) high schools had missed more than 50% of instructional days at their graduating school. More than 30% of graduates (30.6%) missed at least thirty percent of instructional days. While the rise in high rates of absenteeism among graduates and non-graduates is alarming, equally concerning is the precipitous decline in the proportion of students in the graduating cohort with satisfactory attendance. In 2014-15, nearly 20% of graduates had missed less than 5% of instructional days, but by 2016-17 the corresponding proportion had dropped to 7.7%. Only 178 graduates out of 2,307 from all DCPS high schools had satisfactory attendance during the 2016-17 school year; more than 75% of graduates met the state definition of chronic absenteeism, missing more than 10% of school days.

The majority of high school students in the District of Columbia are enrolled in DCPS, so the DCPS-level Figure 4 closely mirrors the state-level Figure 2. Nearly half (49.3%) of students who missed more than 50% of the school year graduated in 2016-17, up from 25.2% in 2014-15. Across the state, there were 265 graduates in the Extreme Chronic Absence band of absenteeism in 2016-17, 262 of those students graduated from DCPS schools.

There are stark differences in the distribution of absenteeism among graduates and non-graduates between Neighborhood and Application schools within DCPS³. Neighborhood schools tend to have the highest prevalence of the most severe rates of absenteeism (Figure 5). More than one third of graduates (36.6%) from Neighborhood schools missed at least 30% of instructional days in 2016-17, compared to 6.1% at Application schools (Figures 5 and 7). Though the graduation rates for students at Application schools with the highest levels of absenteeism are relatively high, there are few graduates with profound and extreme levels of absenteeism (Figure 8). In 2016-17, 90.9% of extremely chronically absent students at Application schools graduated (n=10). Note that data less than 10 are suppressed, and noted in figures with the term, “DS.” For additional technical information, please see Appendix A: Data Notes.

Charter Schools

High schools in the charter sector have had much more stable patterns of attendance in the past three years than high schools in DCPS (Figures 9 and 10). The distributions of absenteeism for both graduates and non-graduates do not appear to vary significantly from year-to-year. Across the charter sector, there are few students within the highest bands of absenteeism, and students who reach profound or extreme levels of chronic absence tend to be concentrated among non-graduates. In 2016-17, less than 5% of students, fewer than ten students total, who missed more than 50% of instructional days graduated. The graduation rate for profoundly chronically absent students grew between 2014-15 and 2016-17, but has remained below 50%.

For additional detail on rates of absenteeism for graduates and non-graduates in the expected graduation classes of the 2014-15, 2015-16 and 2016-17 school years, as well as the graduation rates for students at the highest levels of absenteeism at the school-level, please refer to Appendix B.

³ Neighborhood schools include: Anacostia HS, Ballou HS, Cardozo EC, Coolidge HS, Columbia Heights EC, Dunbar HS, Eastern HS, Roosevelt HS, Wilson HS, Woodson HD HS; Application schools include: Benjamin Banneker HS, Duke Ellington School of the Arts, Schools Without Walls, Phelps ACE HS; Figures for Alternative schools (Luke C. Moore and Washington Metropolitan) can be found in Appendix C.

Figure 3: Absenteeism by Graduates and Non-Graduates, DCPS

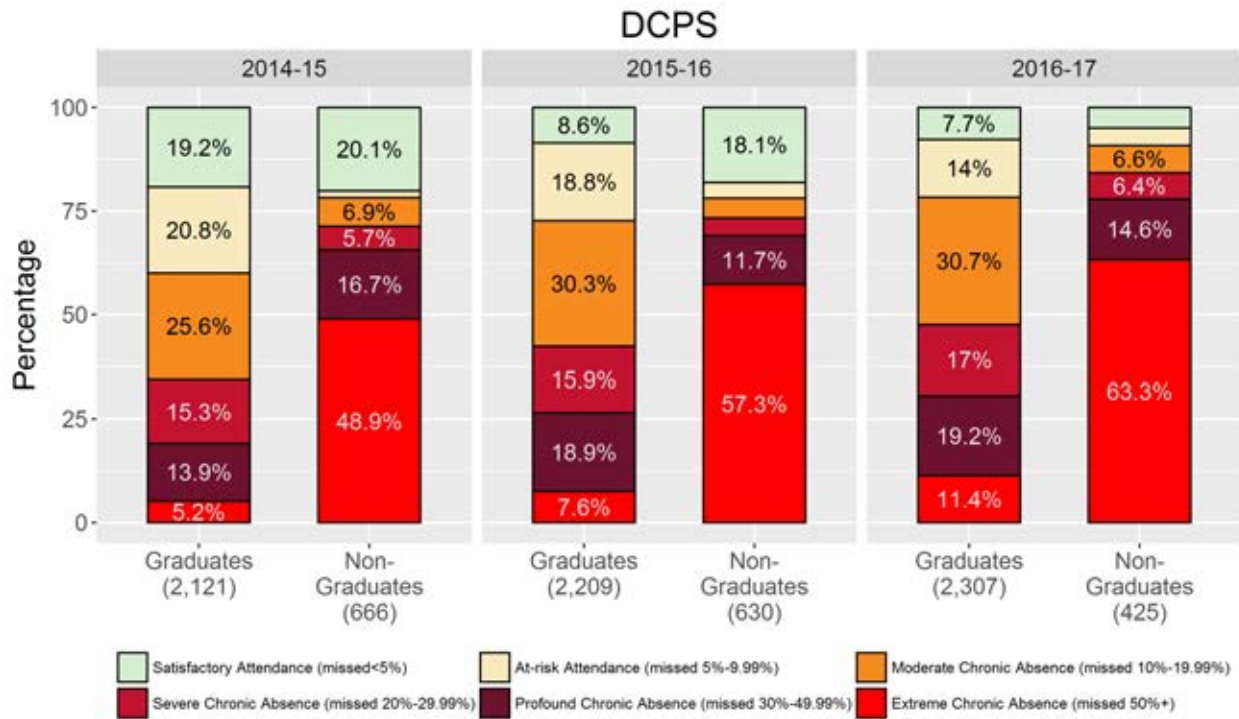
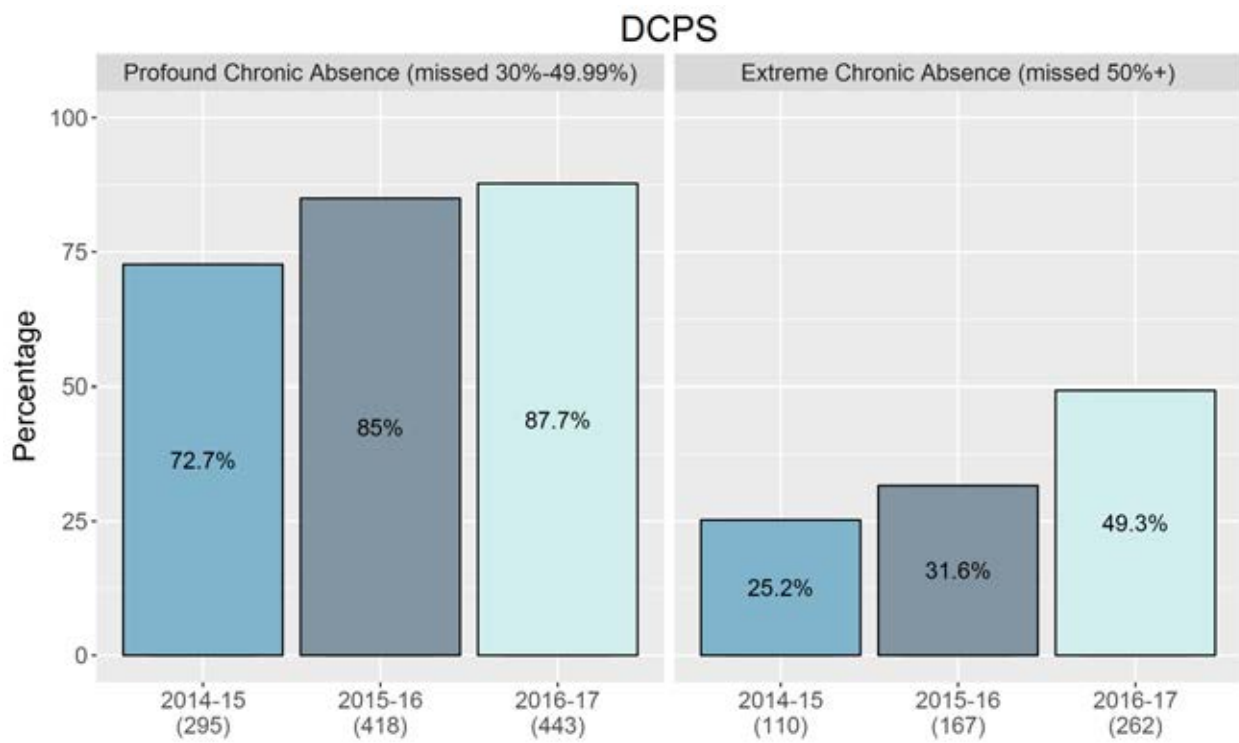


Figure 4: Graduation Rates for Profoundly and Extremely Chronically Absent Students, DCPS



Neighborhood Schools

Figure 5: Absenteeism by Graduates and Non-Graduates, Neighborhood Schools (DCPS)

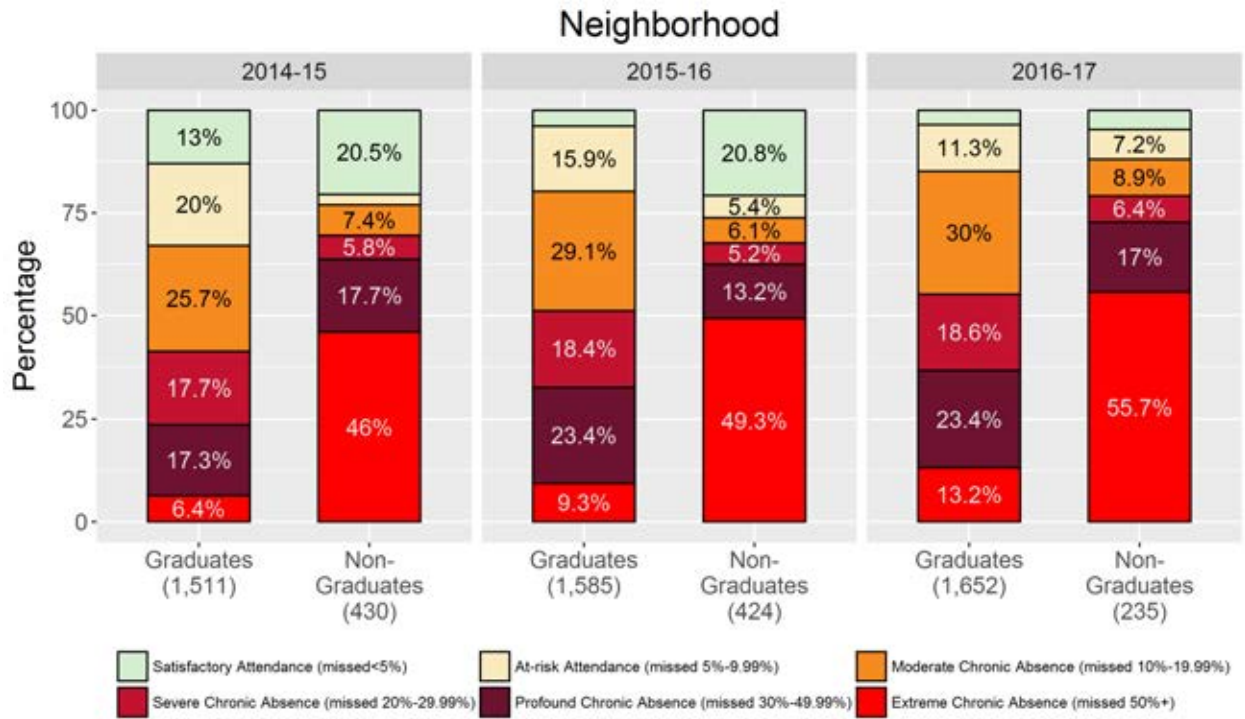
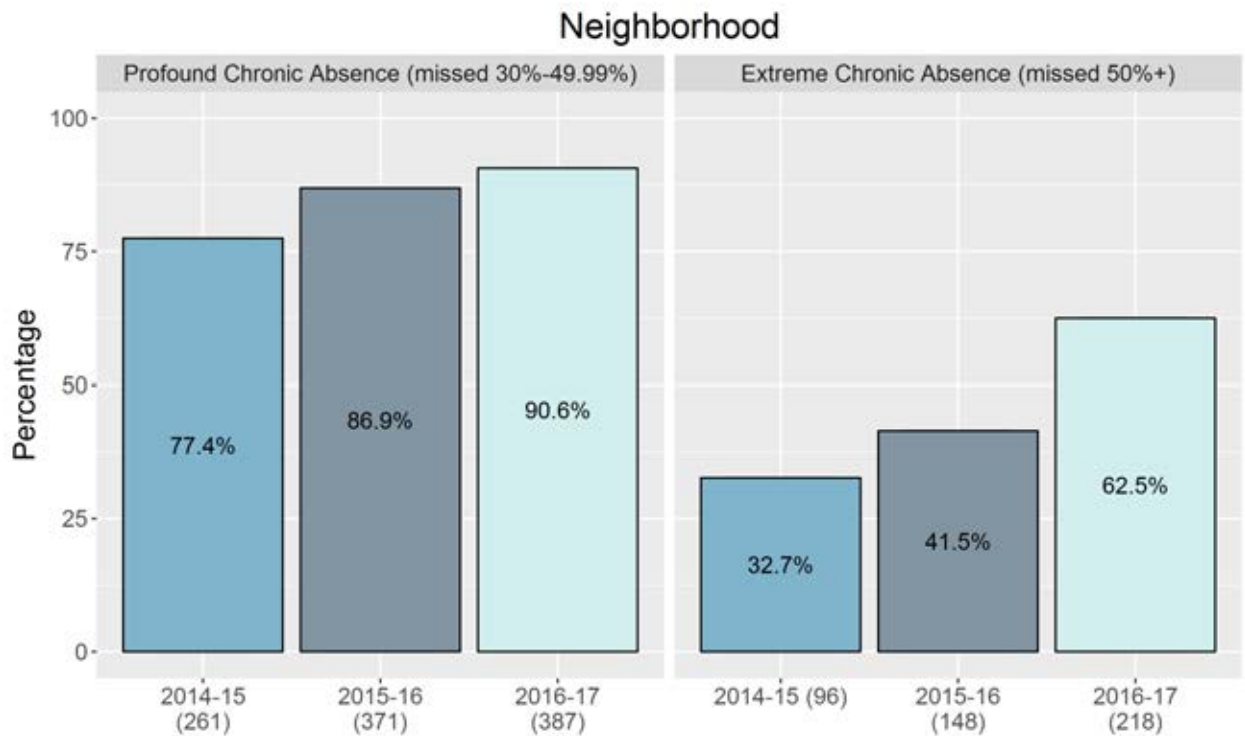


Figure 6: Graduation Rates for Profoundly and Extremely Chronically Absent Students, Neighborhood Schools (DCPS)



Application Schools

Figure 7: Absenteeism by Graduates and Non-Graduates, Application Schools (DCPS)

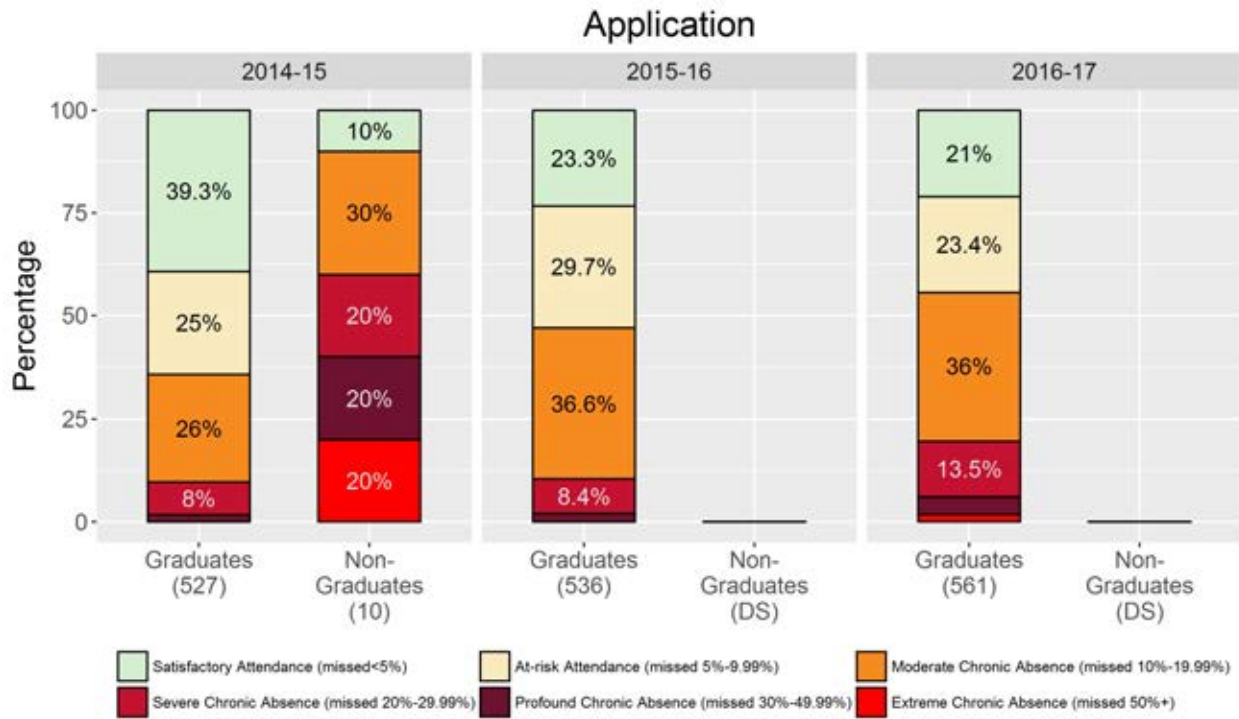


Figure 8: Graduation Rates for Profoundly and Extremely Chronically Absent Students, Application Schools (DCPS)

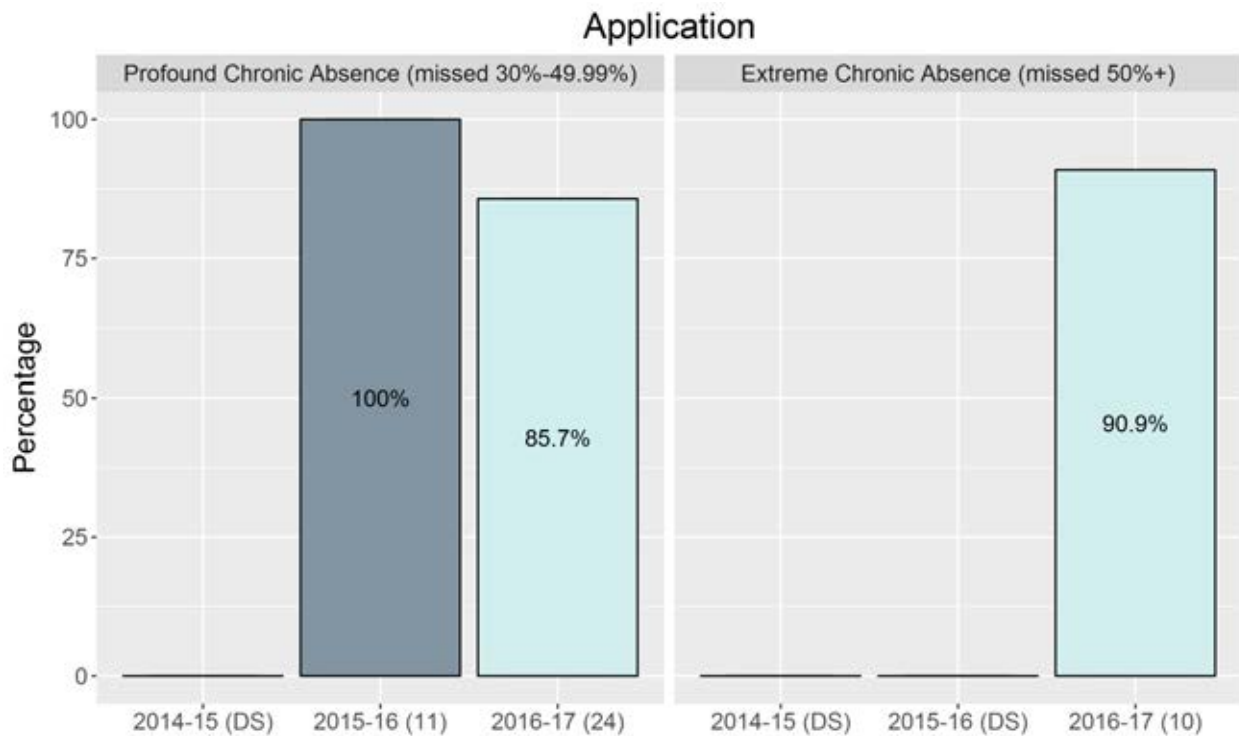


Figure 9: Absenteeism by Graduates and Non-Graduates, PCSB

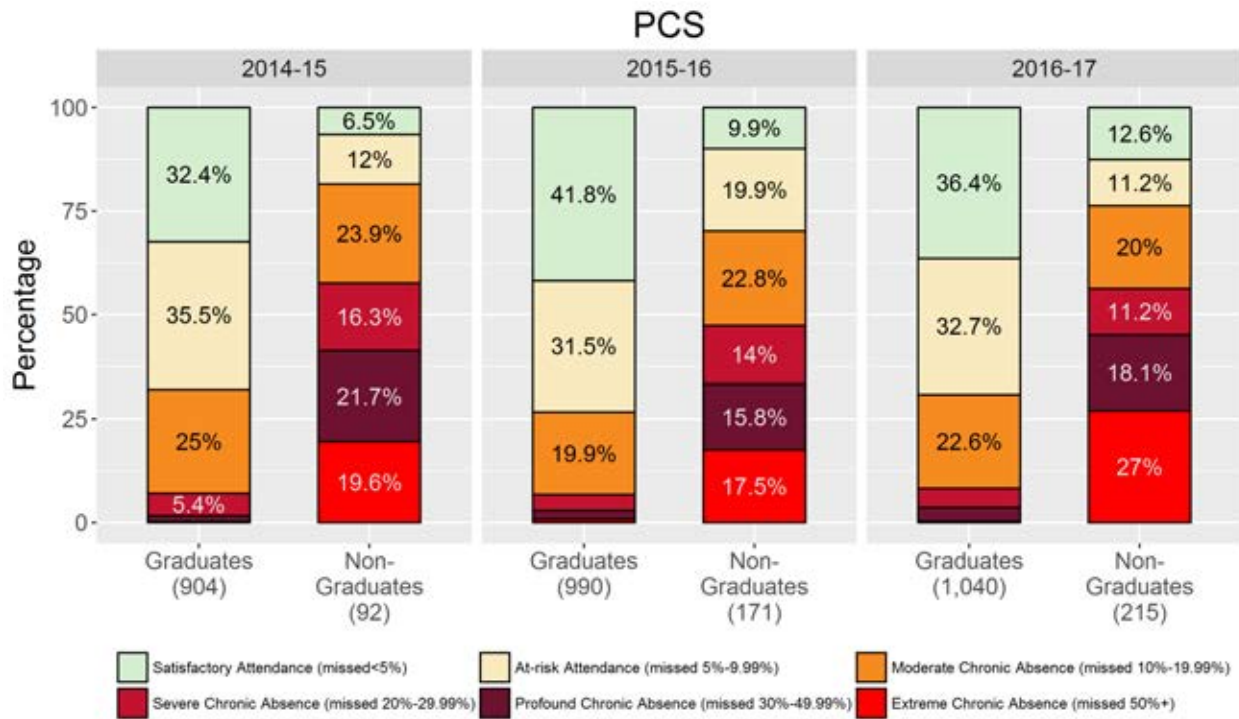
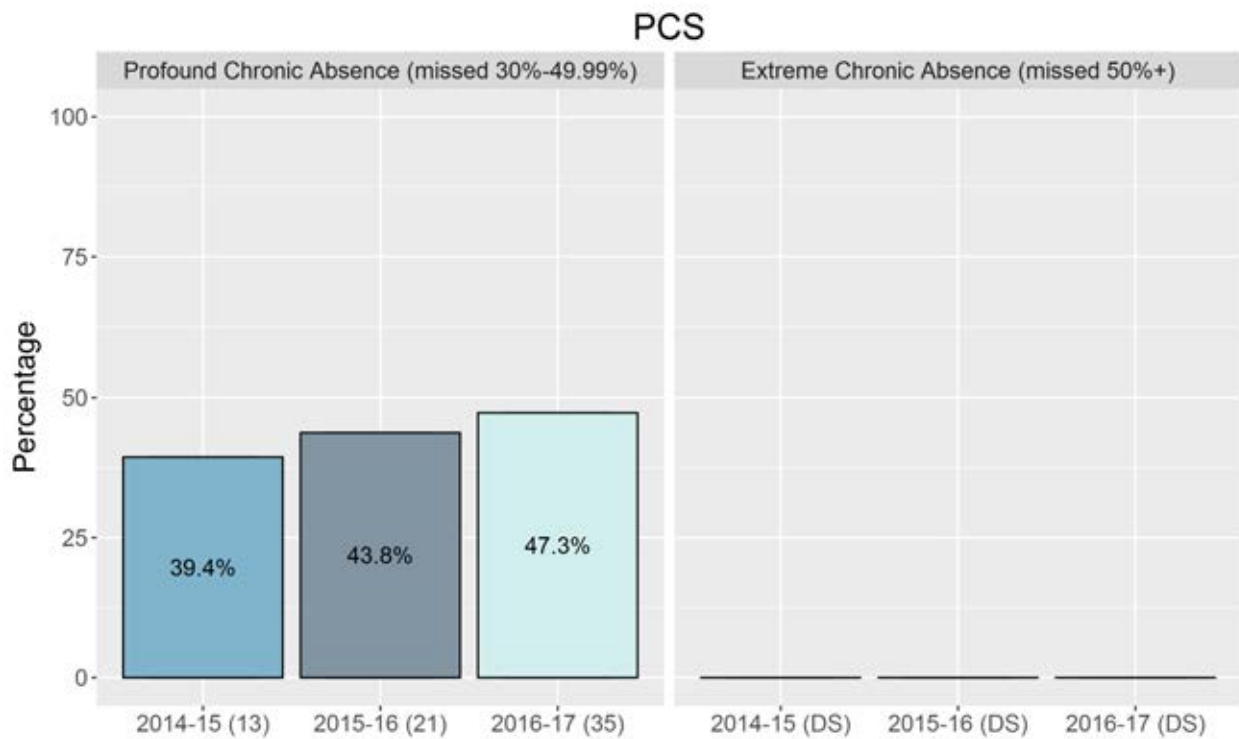


Figure 10: Graduation Rates for Profoundly and Extremely Chronically Absent Students, PCSB



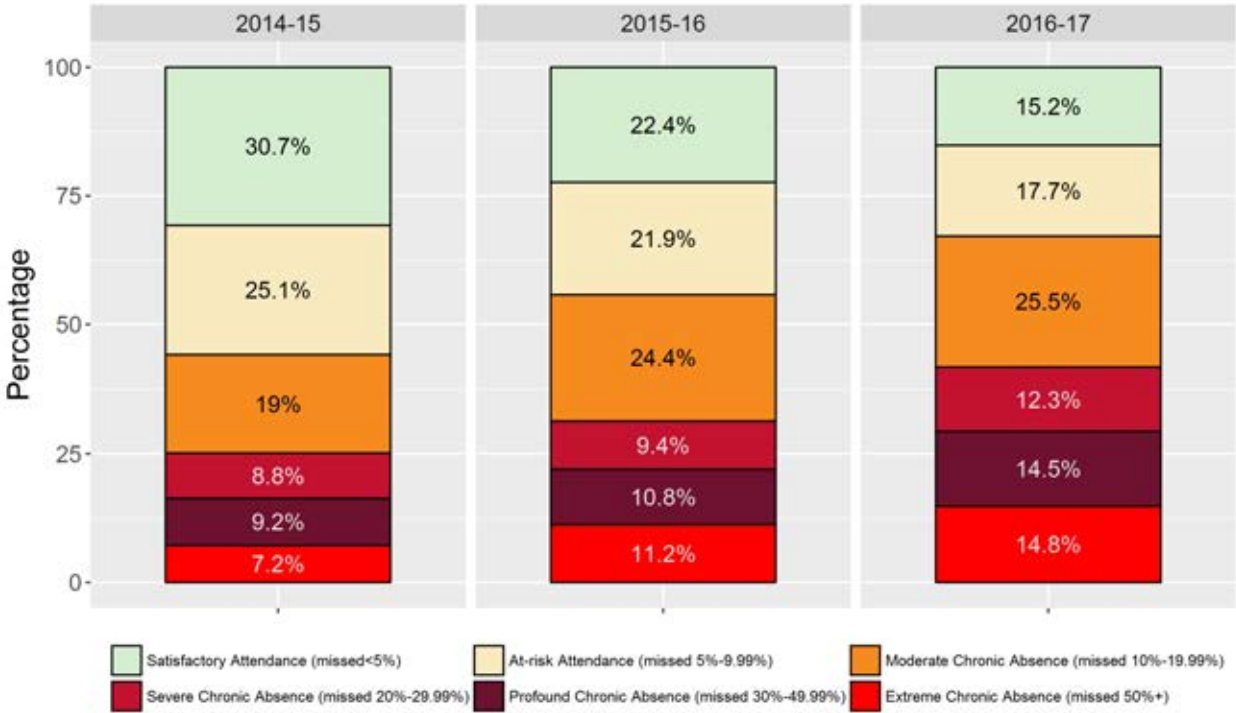
Patterns of Attendance for 2016-17 Graduating Cohort

Absenteeism over the Past Three Years

The following analyses reflect the attendance for students who were in their fourth year of high school during the 2016-17 school year⁴. Data for school years 2014-15 and 2015-16 represent the attendance records for the same students during their second and third years of high school. It is important to note that these analyses do not capture students who become disengaged after their first ninth grade year. However, data for all students from the 2016-17 graduating cohort with attendance records in 2014-15, 2015-16, and 2016-17 are maintained for each respective year.

Absenteeism among students who were expected to graduate in the 2016-17 school year increased (and therefore, attendance rates worsened) during their tenure in high school. In 2014-15, when the majority of these students were in tenth grade, nearly one-third of students (30.7%) had satisfactory attendance. By the time these students were in their fourth year of high school, the proportion of students with satisfactory attendance fell to 15.2%. Figure 11 also demonstrates that high levels of absenteeism exist across all years of high school; it is not solely concentrated among high school seniors. Students tend to accumulate more absences as they progress through high school, but there is no dramatic jump in absenteeism for students in their fourth year.

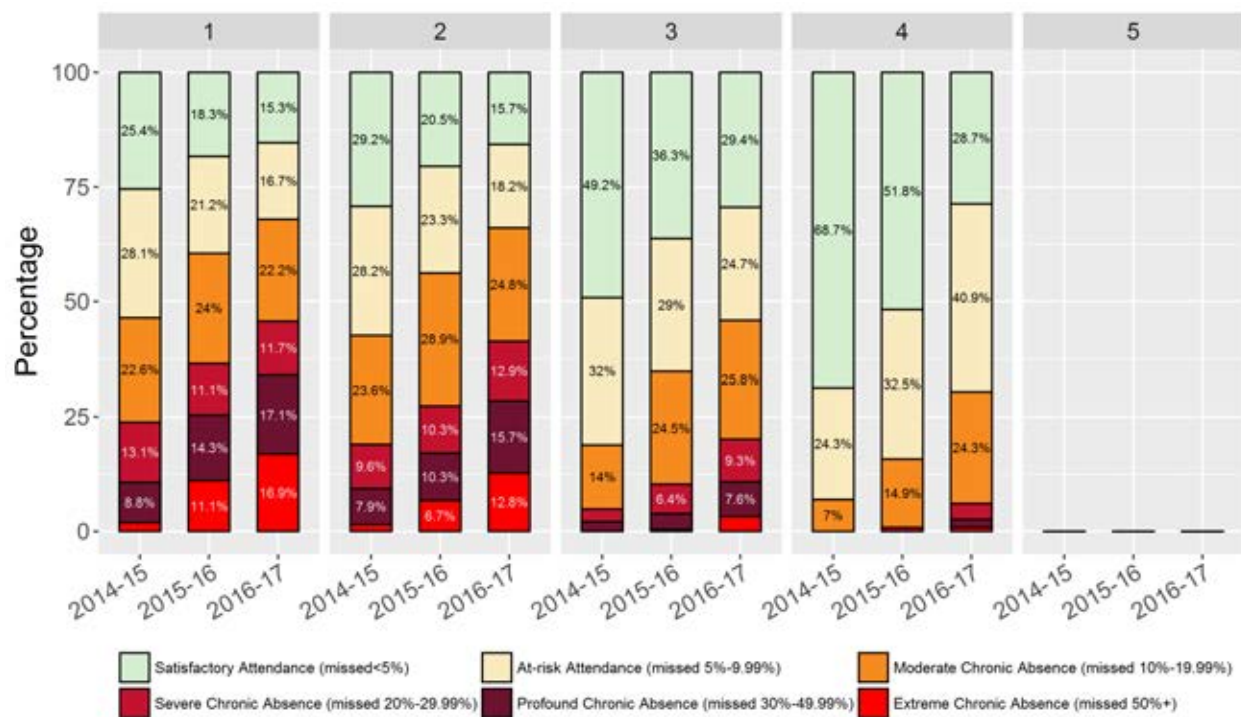
Figure 11: Absenteeism by Year for Students Expected to Graduate in 2016-17



⁴ The analysis in this section of the report examines data for the cohort of students whose first ninth grade year was in 2013-14 and who were expected to graduate in 2016-17. The data are from the students’ second, third, and fourth year of high school (2014-15, 2015-16, and 2016-17, respectively).

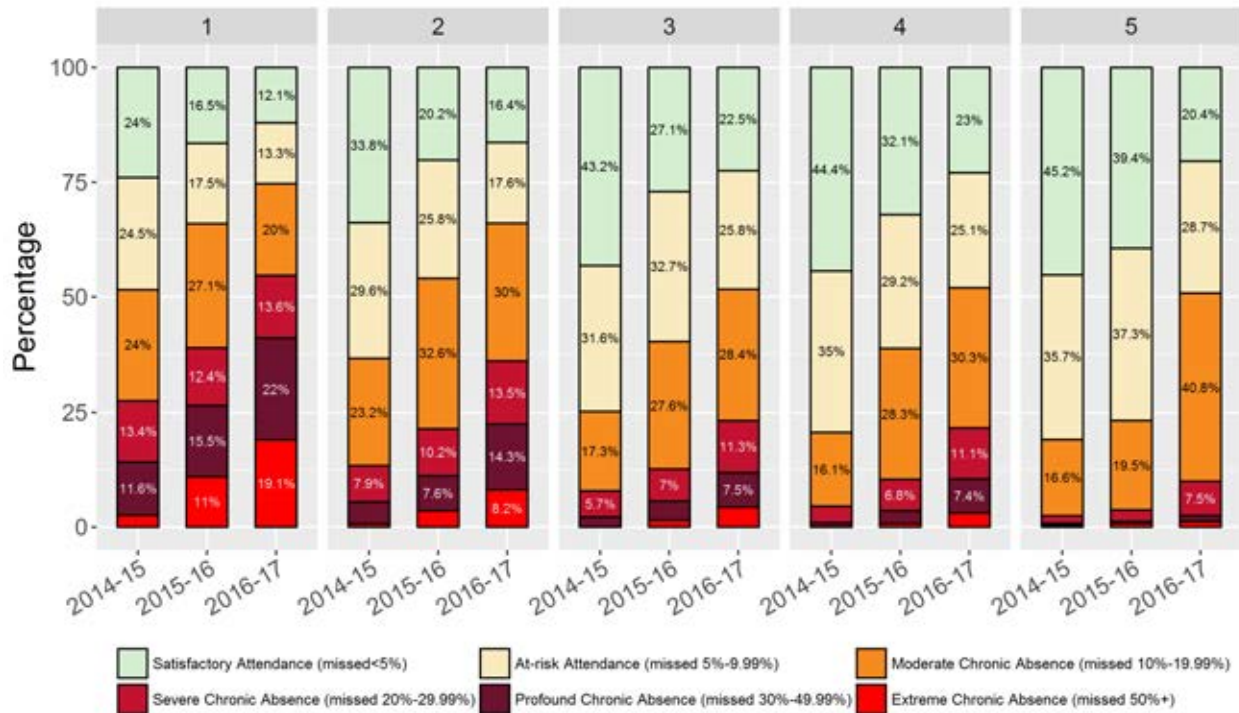
Figures 12 and 13 below show attendance patterns for students expected to graduate in 2016-17 by students' proficiency levels in the PARCC Math⁵ and ELA assessments administered during the 2014-15 school year when the majority of students were in tenth grade and therefore eligible to test. The trend observed over time represents the changing attendance patterns for the same group of students. Absenteeism across all three years is highest among students achieving Levels 1 or 2 for both Math and ELA assessments. But students with scores at Level 4 or even Level 5 proficiency observe rising absenteeism between their testing year (2014-15) and their year of expected graduation (2016-17). Though the starting levels of absenteeism are highest for the lowest performing students, students at all levels of achievement tend to miss more school in later years of high school.

Figure 12: Absenteeism over Time, by PARCC Math Proficiency Level



⁵ Data suppressed for students who scored a proficiency level of 5 in the 2014-15 PARCC Math Assessment due to small n-size.

Figure 13: Absenteeism over Time, by PARCC ELA Proficiency Level



Patterns of Absenteeism during 2016-17 School Year

While Figure 14 depicts the day-by-day absence rates for the 2016-17 school year among graduates and non-graduates for all students who were expected to graduate in 2016-17⁶, Figure 15 describes day-by-day absenteeism for only those students who were profoundly or extremely chronically absent (those that missed at least 30% of instructional days) during the 2016-17 school year. The data depicted in each figure reflect only the rates of absenteeism on instructional days during the school year. Therefore, certain months will have fewer instructional days due to school breaks (e.g., December, April, and August).⁷

Figure 14 shows that on any given day during the middle months of the school year, close to 50% of non-graduates were absent from school. Overall lower levels of absenteeism at the beginning and the end of the year were observed among both graduates and non-graduates, however the shocks, or noticeable jumps and drops, in the rates of absence for graduates and non-graduates show different patterns.⁸

The sizable gap in the daily absence rates between graduates and non-graduates highlights the strong relationship between attendance and graduation. In the District of Columbia, students expected to graduate in 2016-17 who missed more than 30% of instructional days in the 2016-17 school year were

⁶ The analysis in this section of the report examines attendance data in the 2016-17 school year for students in their fourth year of high school expected to graduate in the 2016-17 school year

⁷ In October of the 2016-17 school year, the first instructional day of the month was October 3, 2016; therefore, the date corresponding to the October x-axis label is October 3, 2016. A similar logic is applied to the other months in Figure 14 and Figure 15.

⁸ On exception to this pattern occurred on March 14th, when there was a winter storm, where absenteeism was higher for students who ended up graduating at the end of the year than for non-graduating students.

more than 80% less likely to graduate than students with lower levels of absenteeism; students who missed more than 50% of school days were approximately 90% less likely to graduate.

As seen in Figure 15, the patterns of attendance for graduates and non-graduates demonstrating profound or extreme levels of absenteeism seem to progress in a relatively parallel manner during the school year: a steady rise in absence rates during the fall quarter, with a highly visible drop in absenteeism on October 19th, 2016, as well as a notable drop in absences during the final month of school.

Figure 14: Day-by-Day Absence Rates by Graduates and Non-Graduates

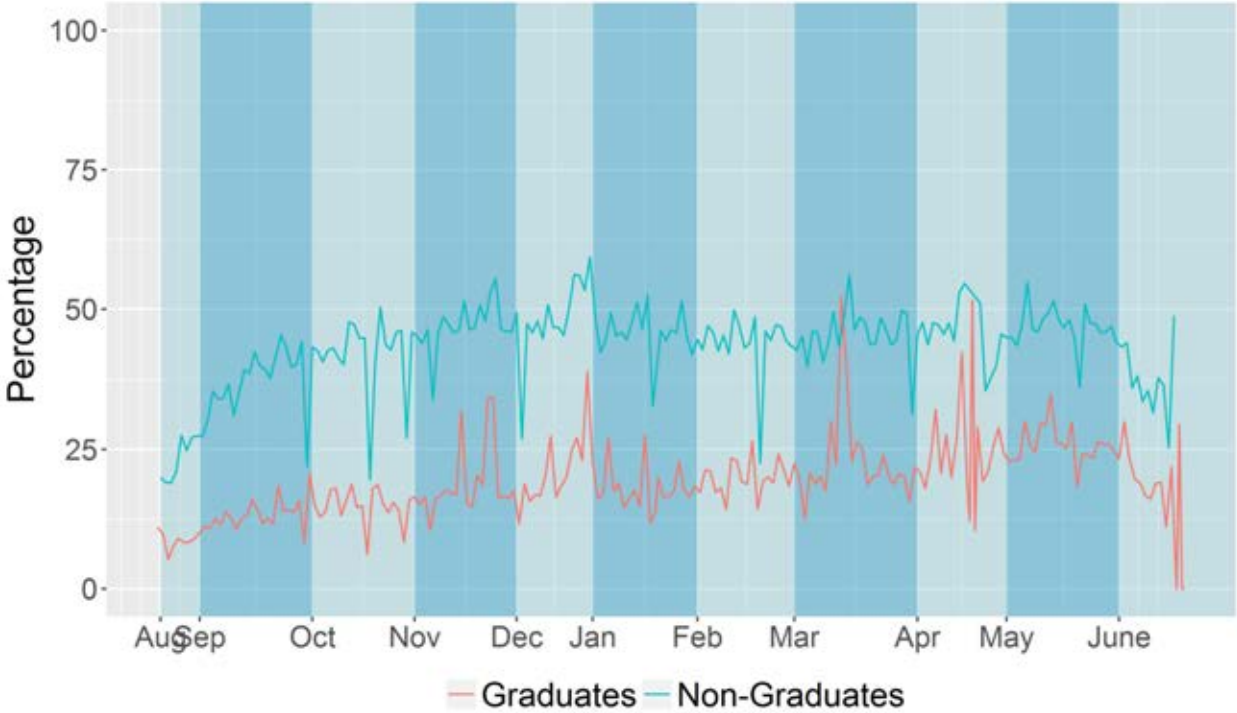
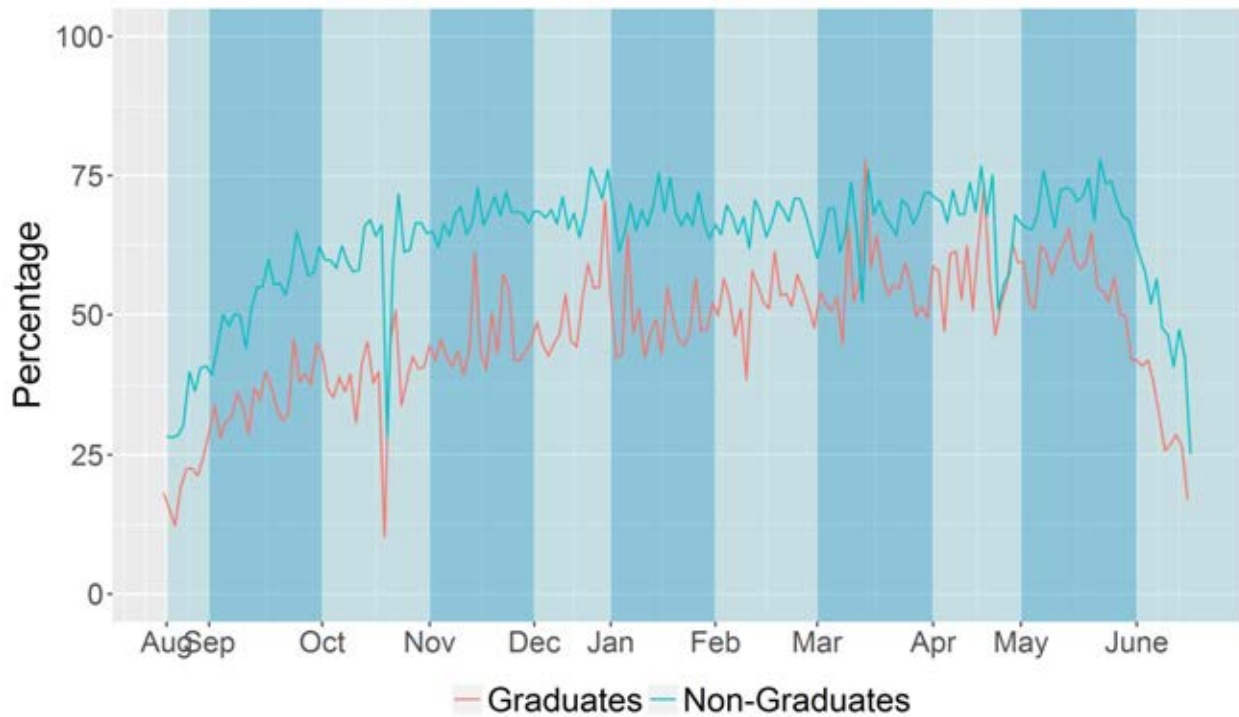


Figure 15: Day-by-Day Absence Rates by Graduates and Non-Graduates, Students with Profound and Extreme Chronic Absenteeism



Deep Dive: Student Populations

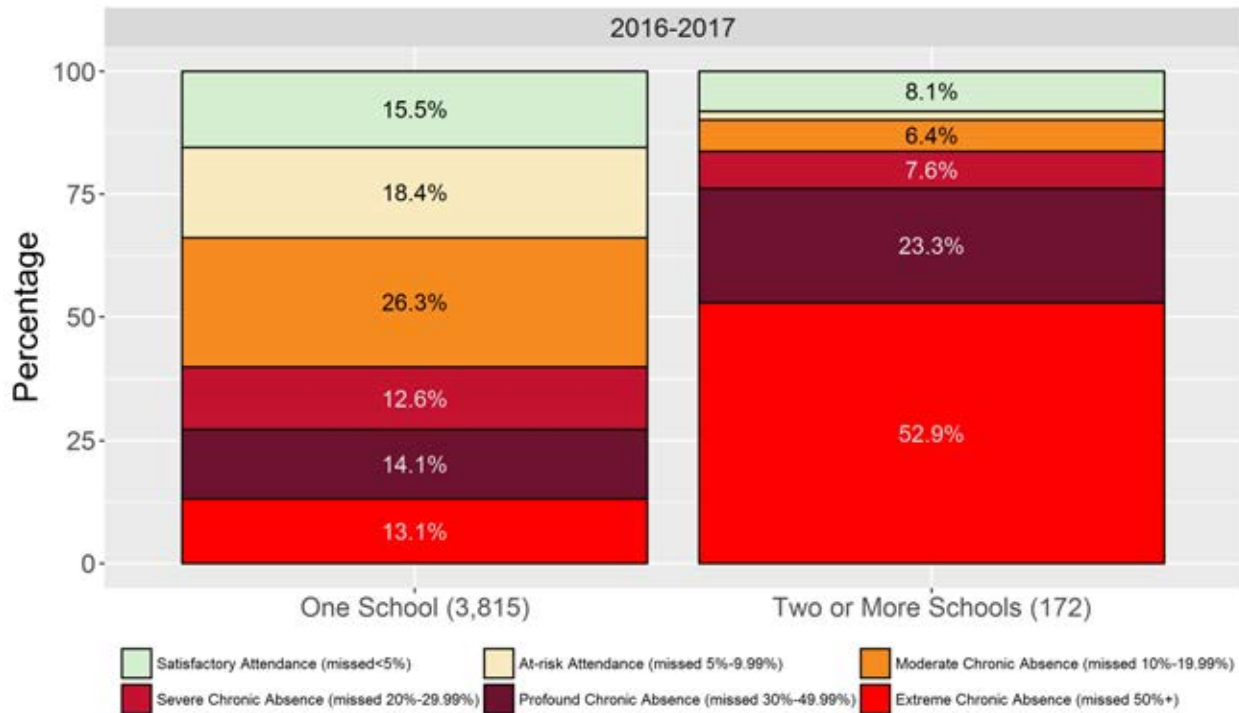
Student Mobility

The vast majority of students (95.7%) attend only one school in their fourth year of high school. But the degree of absenteeism among the 172 students who attended two or more schools in the year they were expected to graduate high school is significantly higher than found in the population of students who remained at one school (Figure 16). More than three-quarters of all mobile students missed 30% or more of the instructional days at the school from which they were expected to graduate⁹; close to 53% of students missed more than half of school days. There also seems to be a high degree of association between student mobility and discipline: more than 95 percent of mobile students received an out-of-school suspension during the 2016-17 school year. Further investigation revealed that 26 of the 172 mobile students had been exited from their first school of enrollment due to “LEA policy related to absenteeism or truancy”¹⁰. Only 59 of the 172 mobile students graduated on time.

⁹ In most cases, this would be the second school the student at which the student was enrolled during the 2016-17 school year. For full description of responsible schools are assigned for the purposes of the Adjusted Cohort Graduation Rate, please refer to [ACGR policy](#).

¹⁰ See the [OSSE Entry and Exit Guidance](#) for more detail on exit codes and corresponding exit reasons reported to OSSE by LEAs

Figure 16: Absenteeism by Student Mobility



At-Risk Student Populations

Similar to patterns observed for the District as a whole, at-risk students in their fourth year of high school have higher rates of absenteeism than their peers who are not designated as at-risk. The degree of absenteeism among at-risk students in the year they were expected to graduate, however, is far more acute than was found for students across all ages. Nearly a quarter of at-risk students in their fourth year of high school missed more than 50% of instructional days. For homeless students, a component of at-risk status, the corresponding share is 34.1% (Figure 18).

At-risk students are less likely to graduate than students not designated as at-risk across all levels of attendance. Whereas 40% of the 516 at-risk students who were extremely chronically absent graduated, the graduation rate for the 76 extremely chronically absent students who were not considered at risk exceeded 80%. At the next highest absenteeism risk tier, 78.7% of at-risk students who missed between 30%-49.99% of instructional days graduated; the graduation rate among students not at-risk was 93%.

Figure 17: Absenteeism by At-Risk Status

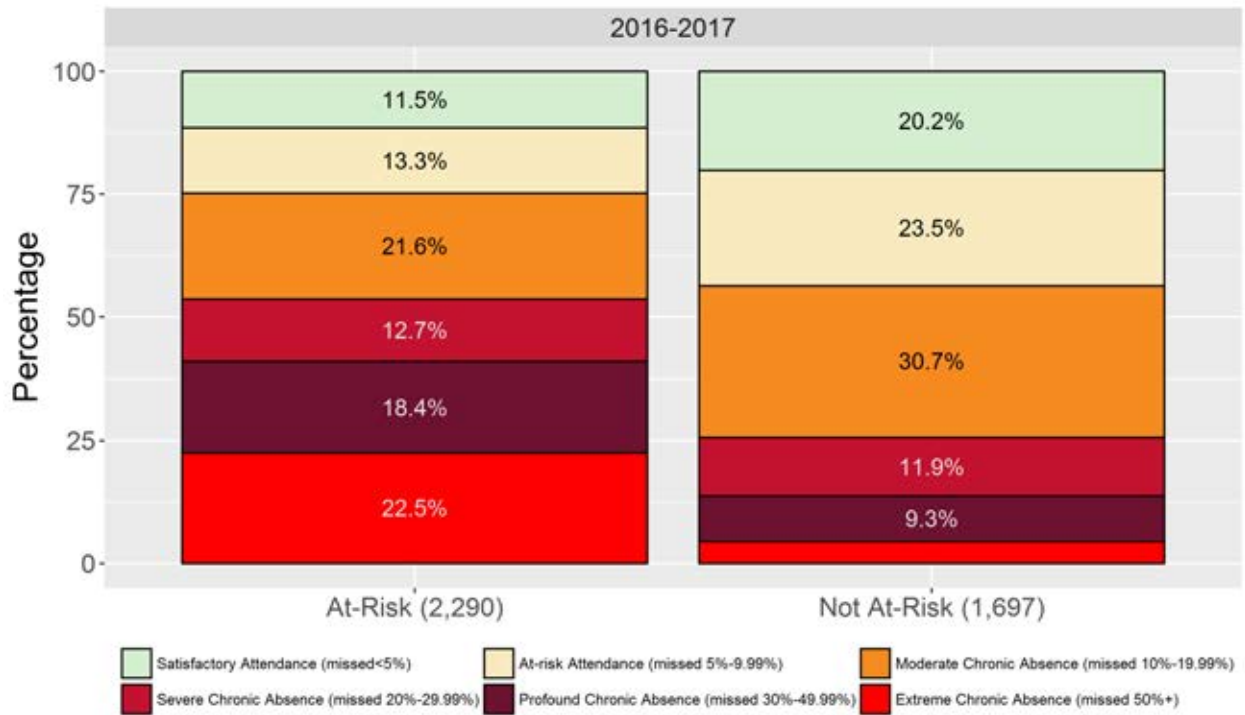
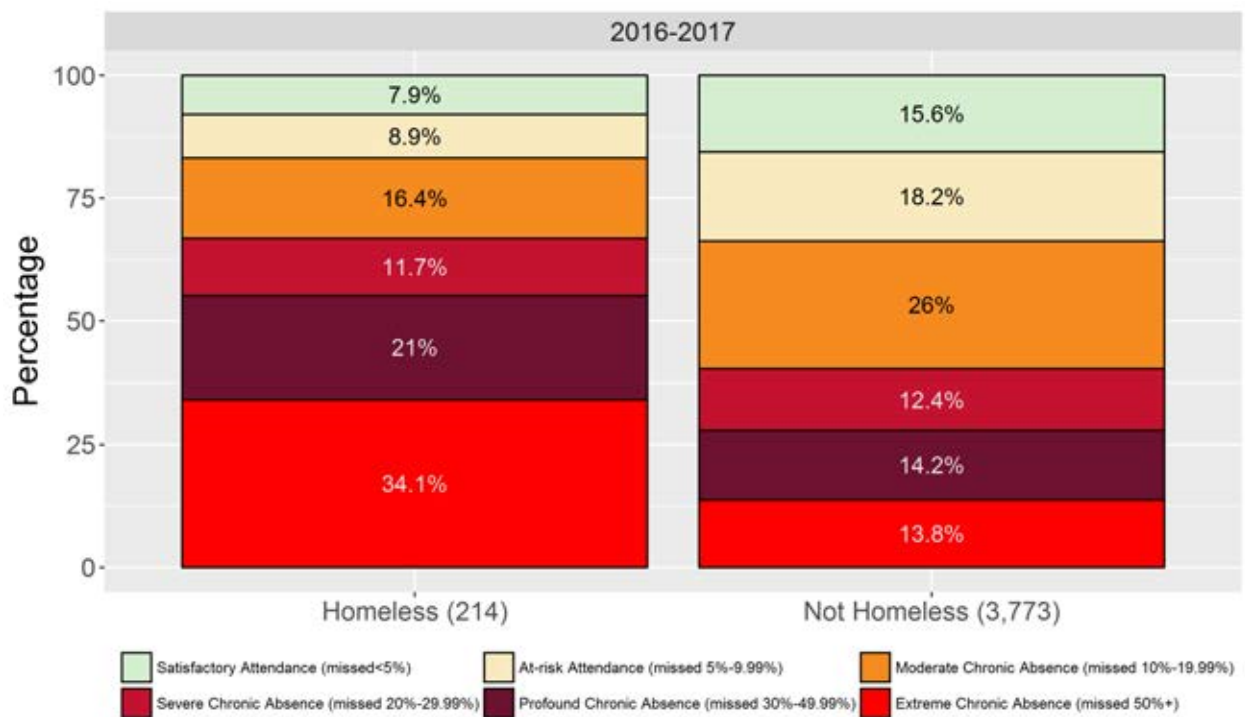


Figure 18: Absenteeism by Homeless Status



Appendix A: Data Notes

Student Population

The analyses in this report pertain to students in their expected graduation year (i.e., their 4th year of high school); therefore all graduates included in these analyses are on-time graduates. Students that graduated after their fourth year of high school are identified as non-graduates in their cohort, and they are not included as graduates in the cohort of the year in which they graduated. For example, a student that was expected to graduate in the 2015-16 school year (fourth year of high school) but did not graduate until the 2016-17 school year would be included in the 2015-16 cohort as a non-graduate and would not be included in the 2016-17 cohort. This prevents students that graduate after their fourth year from being double counted in the analysis as both non-graduates for one cohort and graduates for another cohort.

Analyses fall into three categories: 1) analysis examining data across three different cohorts – students expected to graduate in the 2014-15, 2015-16 and 2016-17 school years; 2) analysis examining attendance data across three school years for the single cohort of students expected to graduate in the 2016-17 school year; and 3) analysis examining attendance data in the 2016-17 school year for students in their fourth year of high school expected to graduate in the 2016-17 school year. The attendance rates and absenteeism reported in all analyses are limited to the attendance records at the schools from which students graduated or were expected to graduate (i.e. the student’s cohort responsible school)¹¹. Data are suppressed (DS) when the n-size is fewer than ten students..

Data Source and Validation

OSSE first received daily attendance data from LEAs in the 2014-15 school year through the Equity Reports initiative. Starting in the 2015-16 school year, LEAs began submitting attendance data to OSSE on a daily basis via the LEA’s Student Information Systems (SIS); these data are reviewed, finalized and certified by each LEA at the close of each school year via Qlik, a data visualization application.¹²

Current validation processes with regard to attendance data cross-reference LEA attendance data with both enrollment data and attendance data of other LEAs. OSSE does not currently cross-validate attendance data with other data sources.

Definitions

In this report an *absence* is defined as “a full or partial school day on which the student is not physically in attendance at scheduled periods of actual instruction at the educational institution in which s/he was enrolled or attended, and is not in attendance at a school-approved activity that constitutes part of the approved school program.” *Presence* is defined “a single school day on which the student is physically in attendance at scheduled periods of actual instruction at the educational institution in which she or he was enrolled and registered for at least eighty percent (80%) of the full instructional day, or in attendance at a school-approved activity that constitutes part of the approved school program for that student.”¹³

¹¹ See the [Adjusted Cohort Graduation Rate Policy Guide](#) for more detail on how the adjusted cohort and cohort responsible school are defined.

¹² See the [Unified Data Errors](#) guidance document for more detail on attendance errors and the process for resolving errors in Qlik.

¹³ The definitions used in this report align with DCMR 2199.1. Please note that OSSE does not receive detail on partial presence or absence in accord with the 80/20 rule from all LEAs. For the purposes of this analysis, the LEA attendance codes

Attendance Works, a national initiative to promote awareness around the importance of attendance to students' academic success, identifies four tiers of risk with respect to attendance¹⁴:

- 1) Satisfactory Attendance: Students who missed 0%-4.99% of instructional days
- 2) At-Risk Attendance: Students who missed 5%-9.99% of instructional days
- 3) Moderate Chronic Absence: Students who missed 10%-19.99% of instructional days
- 4) Severe Chronic Absence: Student who missed 20% or more of instructional days

For OSSE's annual Attendance Report, an additional fifth risk tier, "Profound Chronic Absence" was created to signify those students who missed more than 30% of instructional days. For the purposes of this report, an additional risk tier, "Extreme Chronic Absence" was created to signify those students who missed more than 50% of instructional days. The term "Severe Chronic Absence" refers to students missing 20%-29.99% of instructional days; the term "Profound Chronic Absence" refers to students missing 30%-49.99% of instructional days. These additional categories help to provide a more detailed look at graduation rates among students demonstrating the highest levels of absenteeism.

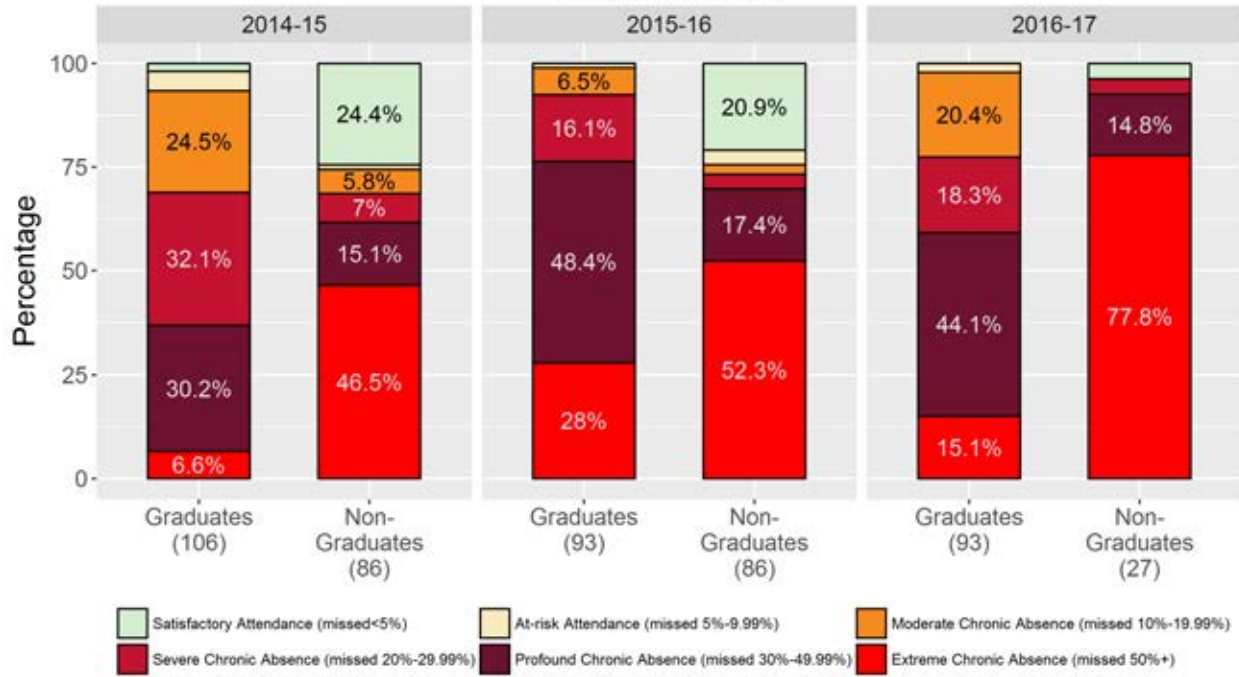
corresponding to the following values are considered present: PF (Present Full), PIS (Present In-School Suspension), PP (Present Partial), PPE (Present Partial Excused), and PPU (Present Partial Unexcused). The LEA attendance codes corresponding to the following values are considered absent: AOS (Absent – Out-of-school Suspension), APU (Absent Partial Unexcused), APE (Absent Partial Excused), AFU (Absent Full Unexcused), AFE (Absent Full Excused), UNK (Unknown), NS (data not sent). Consistent with public reporting, Equity Reports and the Performance Management Framework (PMF) methodologies for reporting on absenteeism, all instructional days that are not coded as present are considered absences.

¹⁴ <http://www.attendanceworks.org/wordpress/wp-content/uploads/2011/06/Attendance-Works-PPT-v-4.pdf>

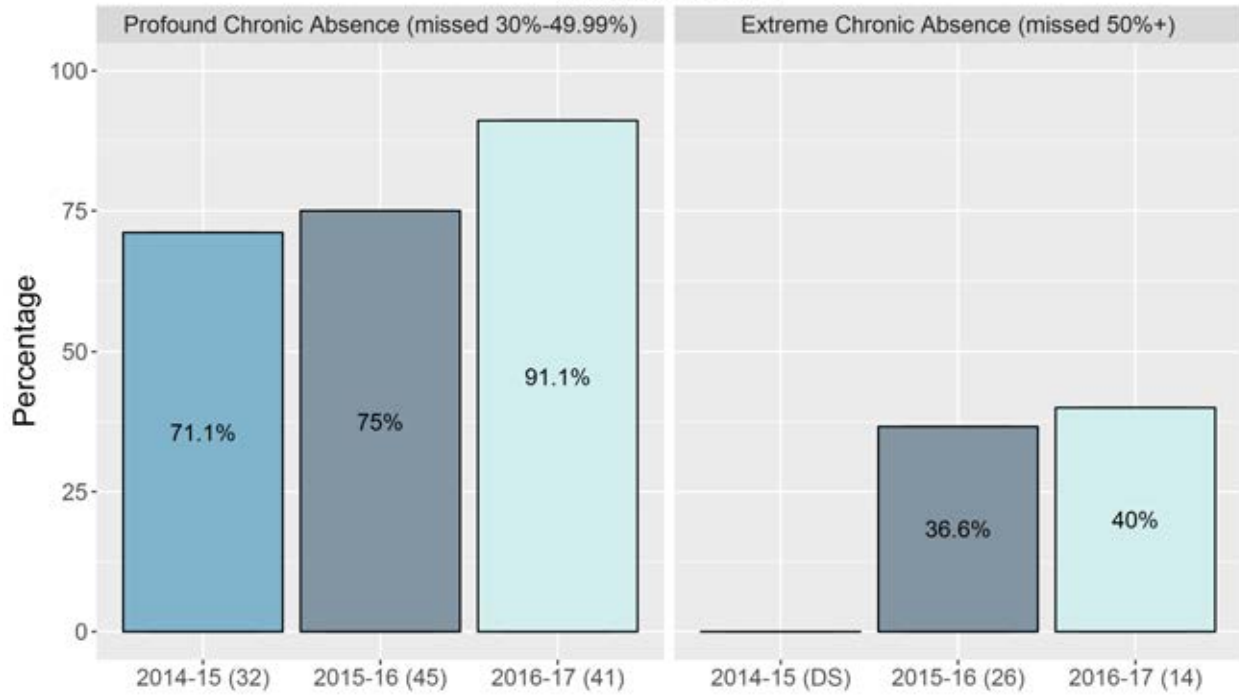
Appendix B: School-level Figures

All school-level figures in Appendix B report data across three different cohorts -- students expected to graduate in the 2014-15, 2015-16 and 2016-17 school years in their fourth year of high school. For each school, the stacked bar figures shown first describe the distribution of attendance patterns for graduates and non-graduates for each cohort in their expected graduation year (i.e. their fourth year of high school); the figures shown second depict the graduation rates for profoundly chronically absent and extremely chronically absent students in each cohort for their expected graduation year. The number of graduates listed in each figure is the number of cohort graduates for that school. Cohort graduates are students that graduated in their expected year of graduation. The number of cohort graduates is not necessarily the same as the total number of graduates from a school in a given year, as the total number of graduates may include students that graduated in their fifth, sixth, or seventh year of high school. The use of graduation cohorts in the figures allows for a valid comparison of graduates and non-graduates across multiple school years.

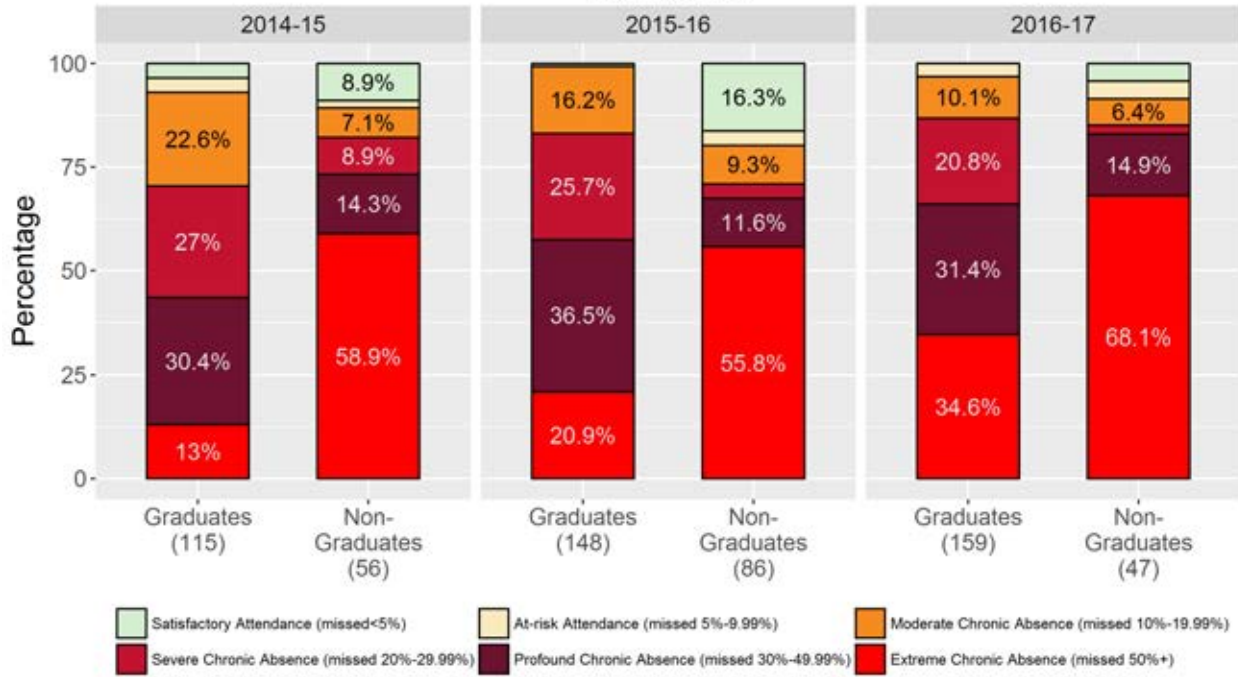
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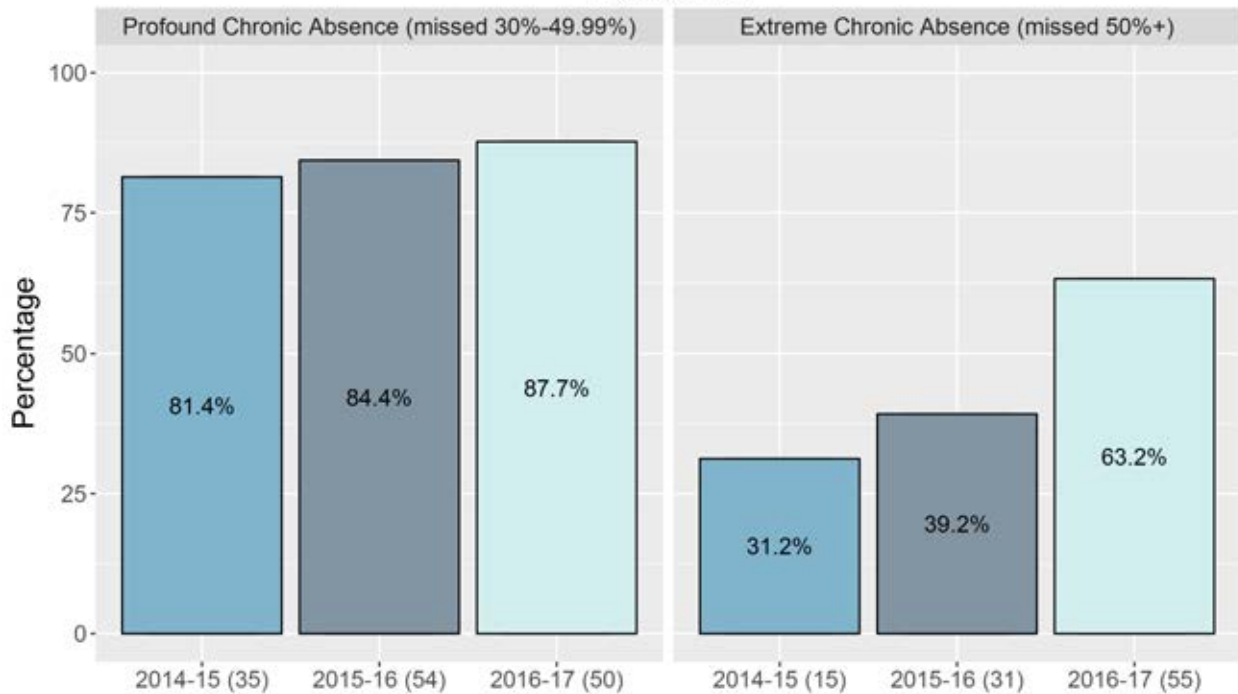
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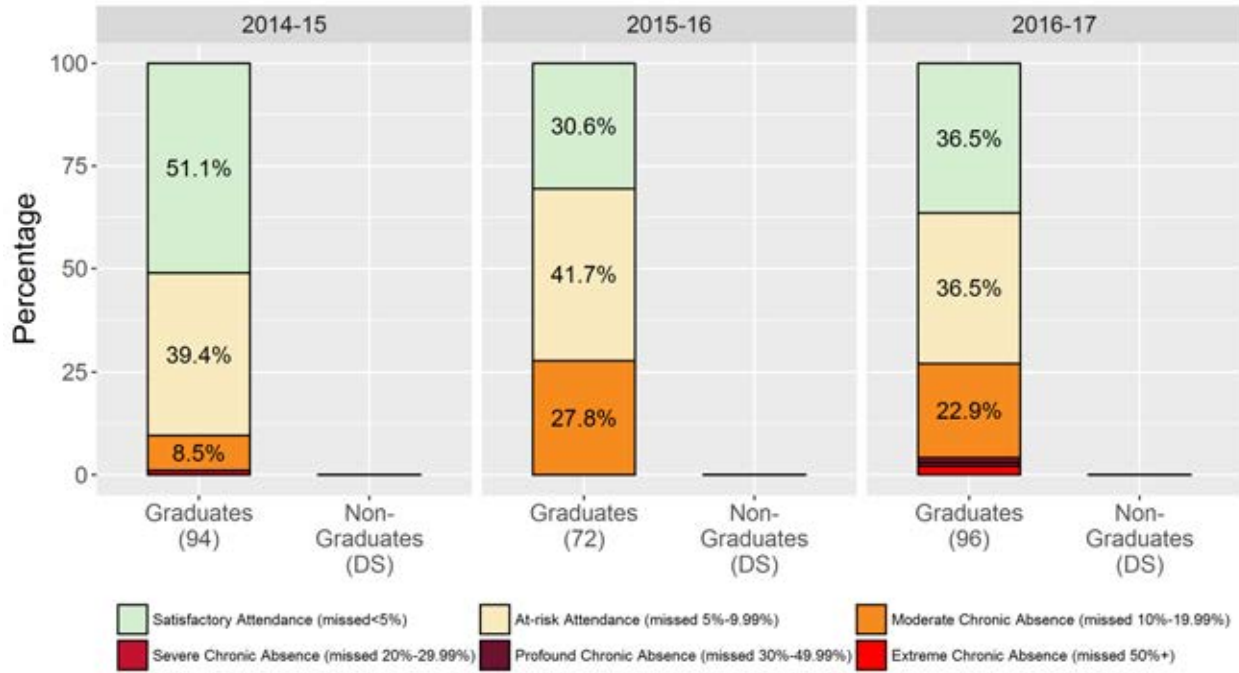
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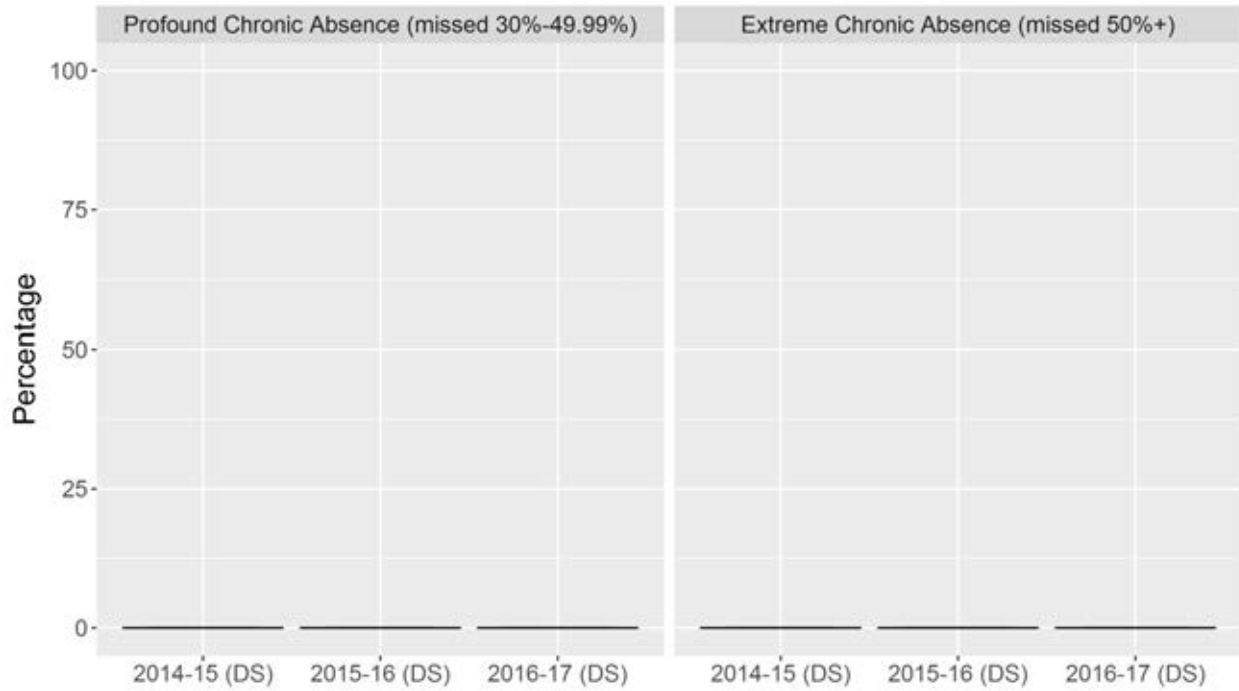
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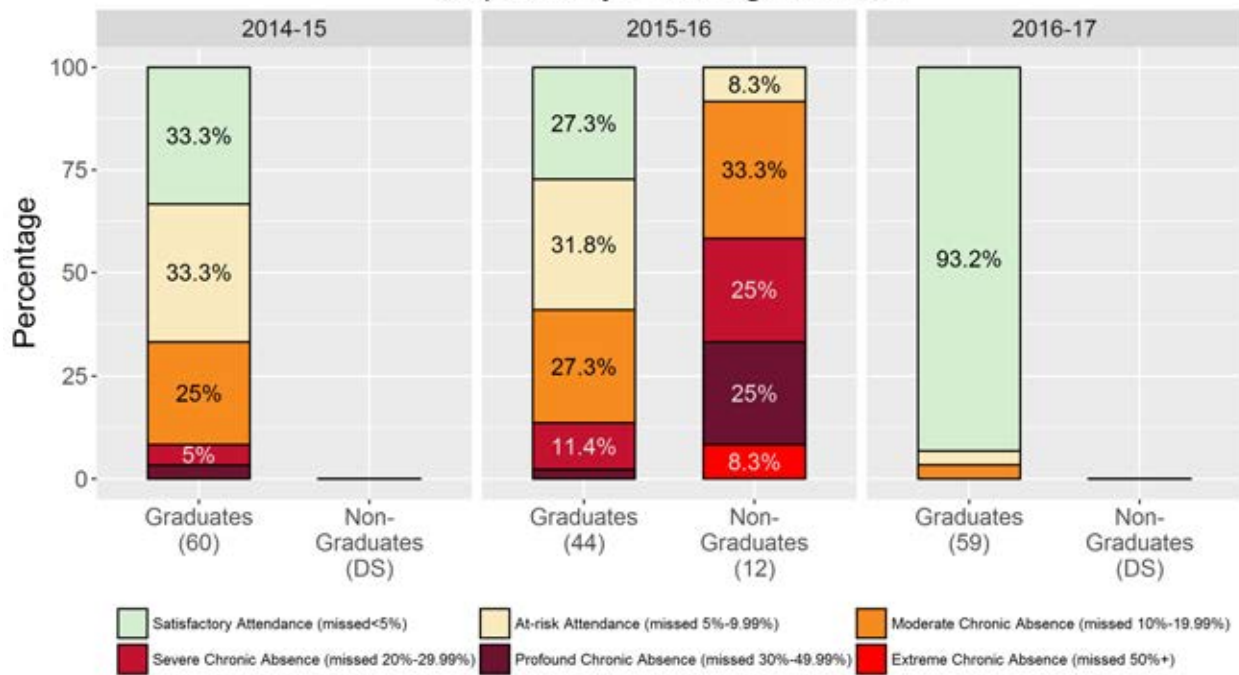
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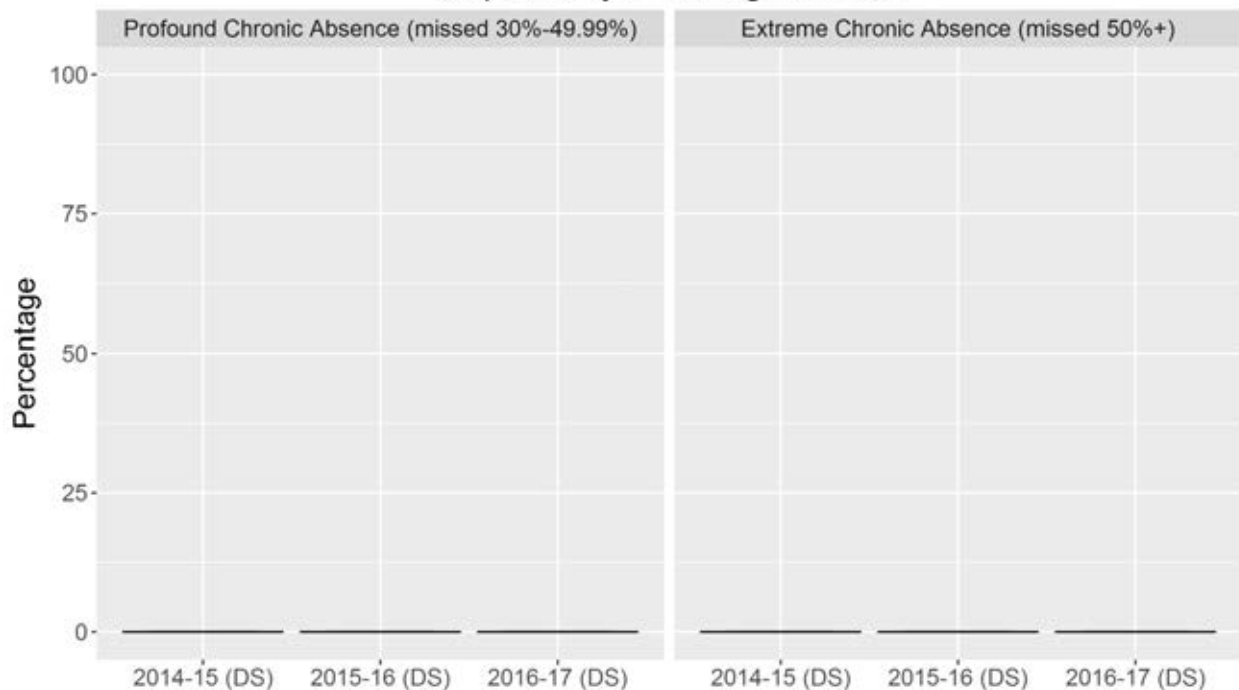
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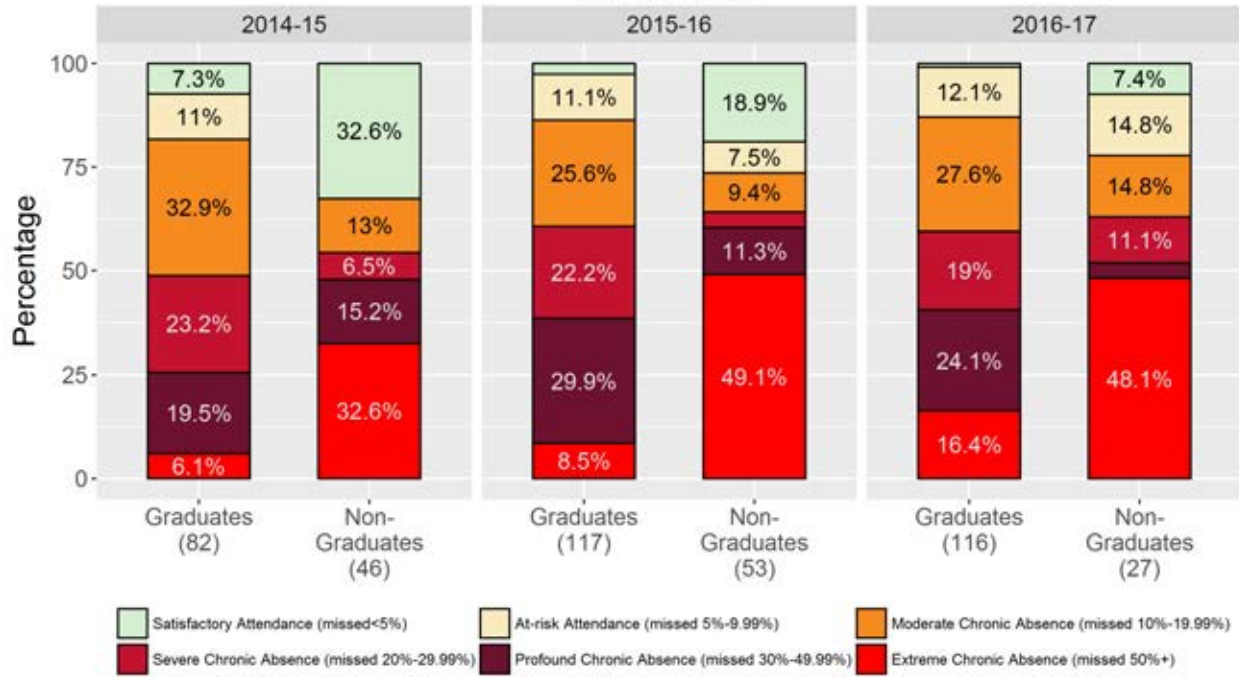
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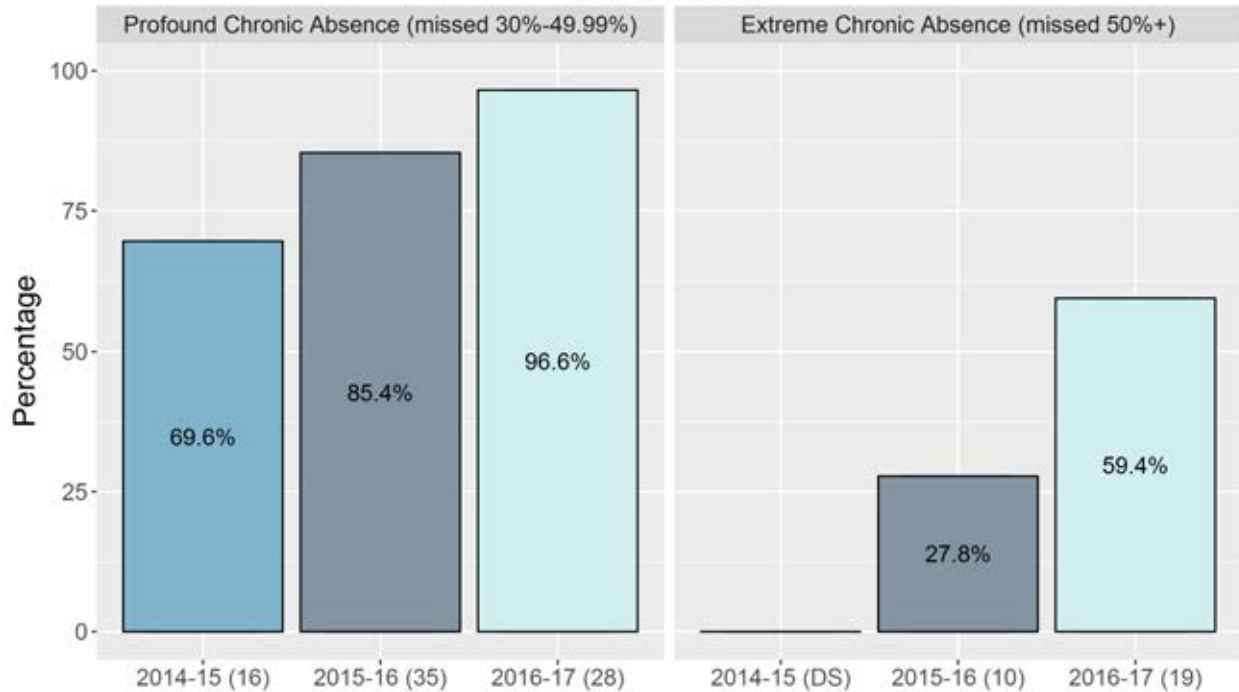
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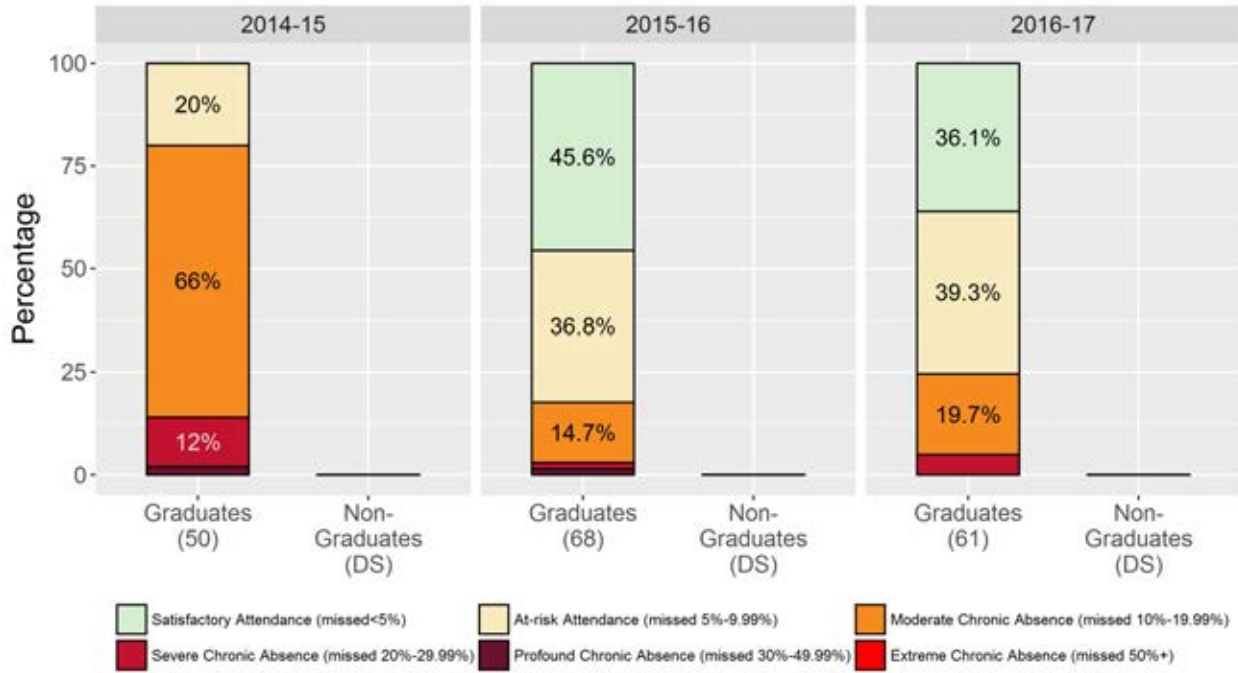
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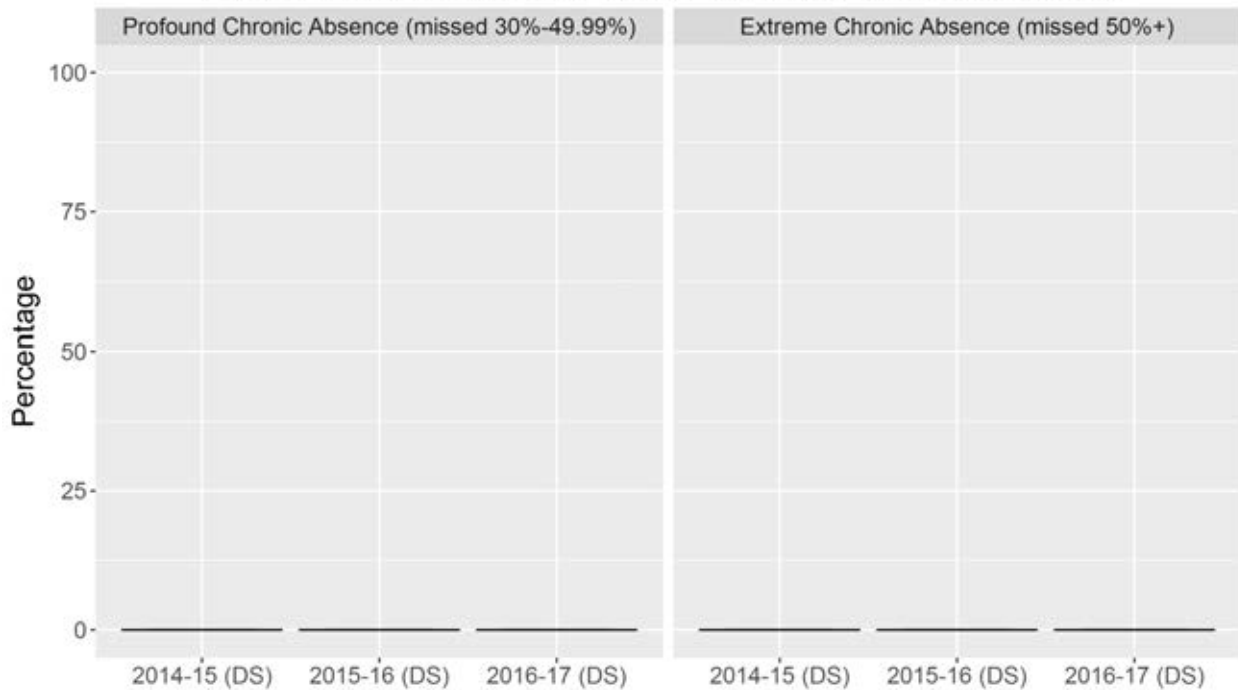
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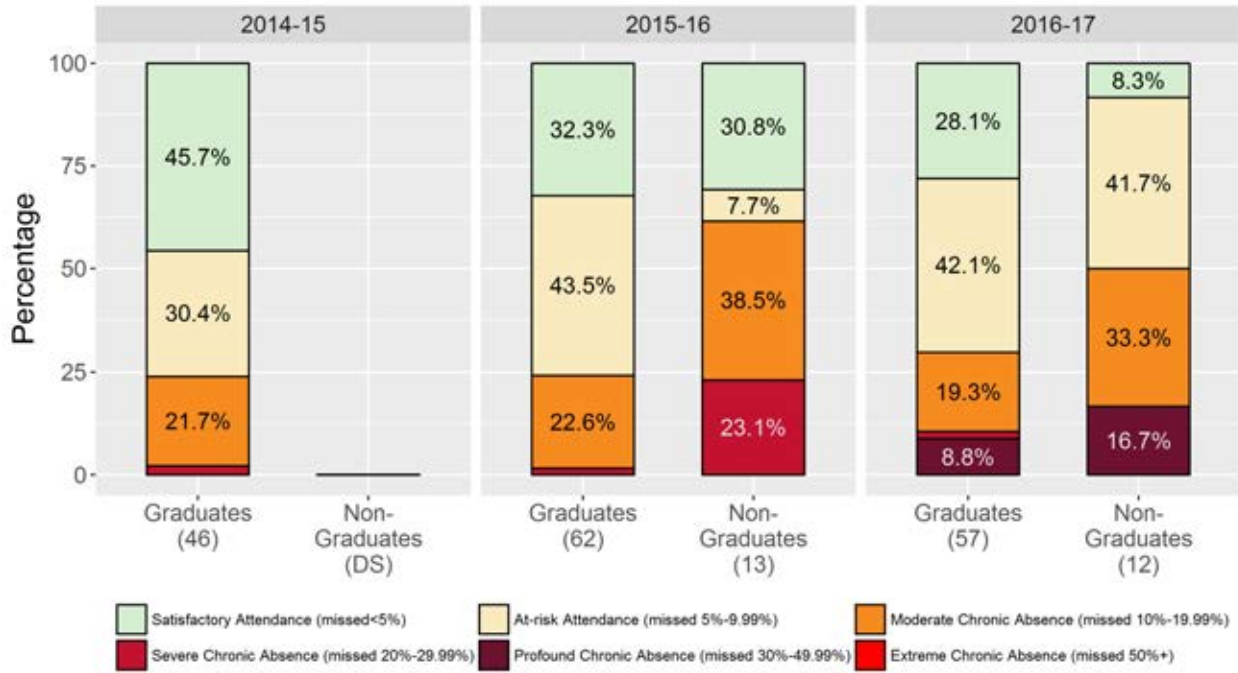
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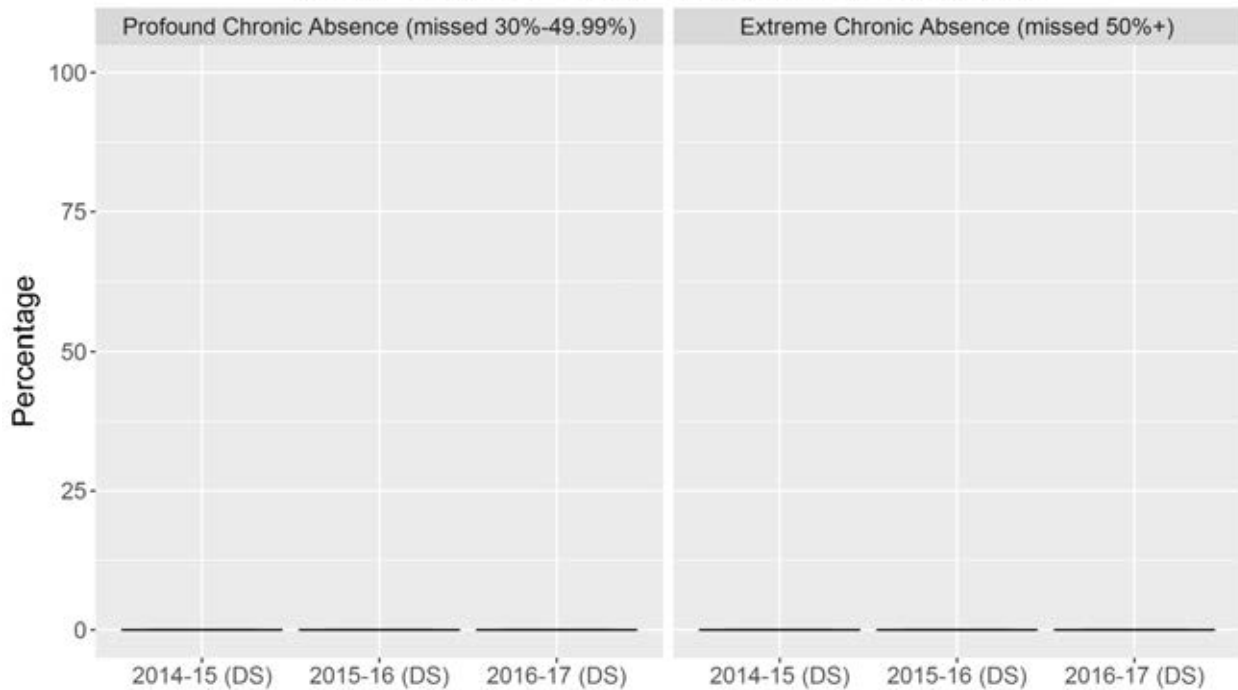
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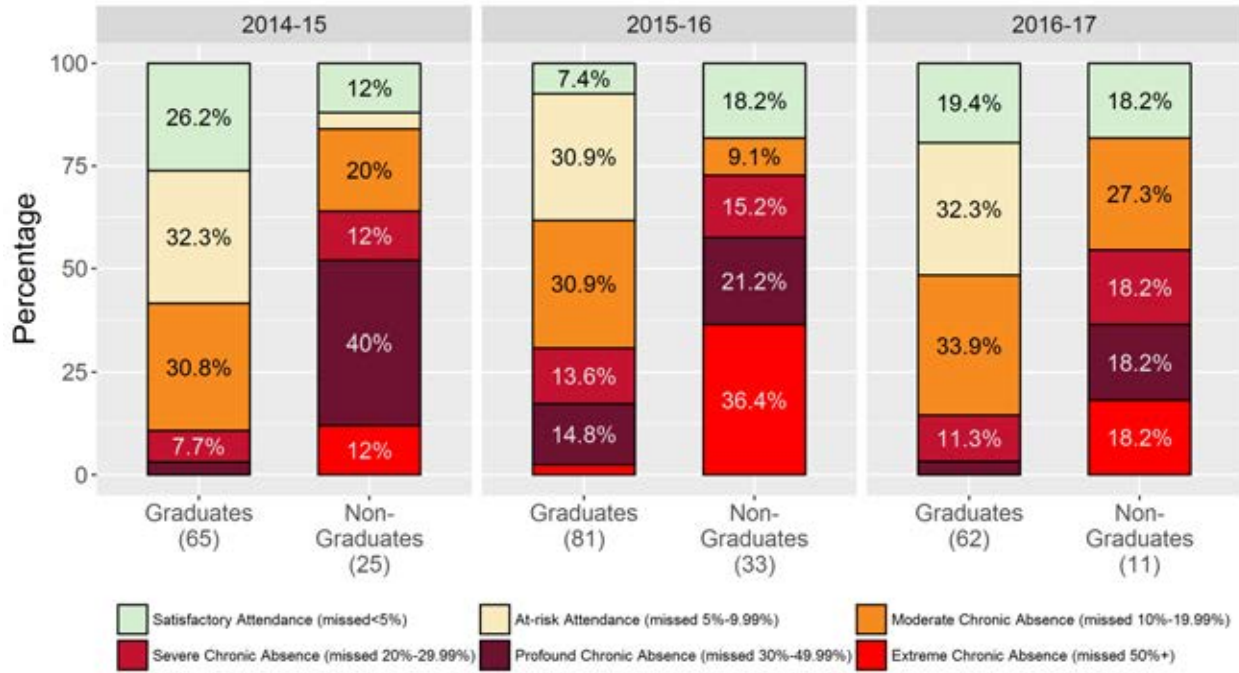
Cesar Chavez PCS for Public Policy Capitol Hill



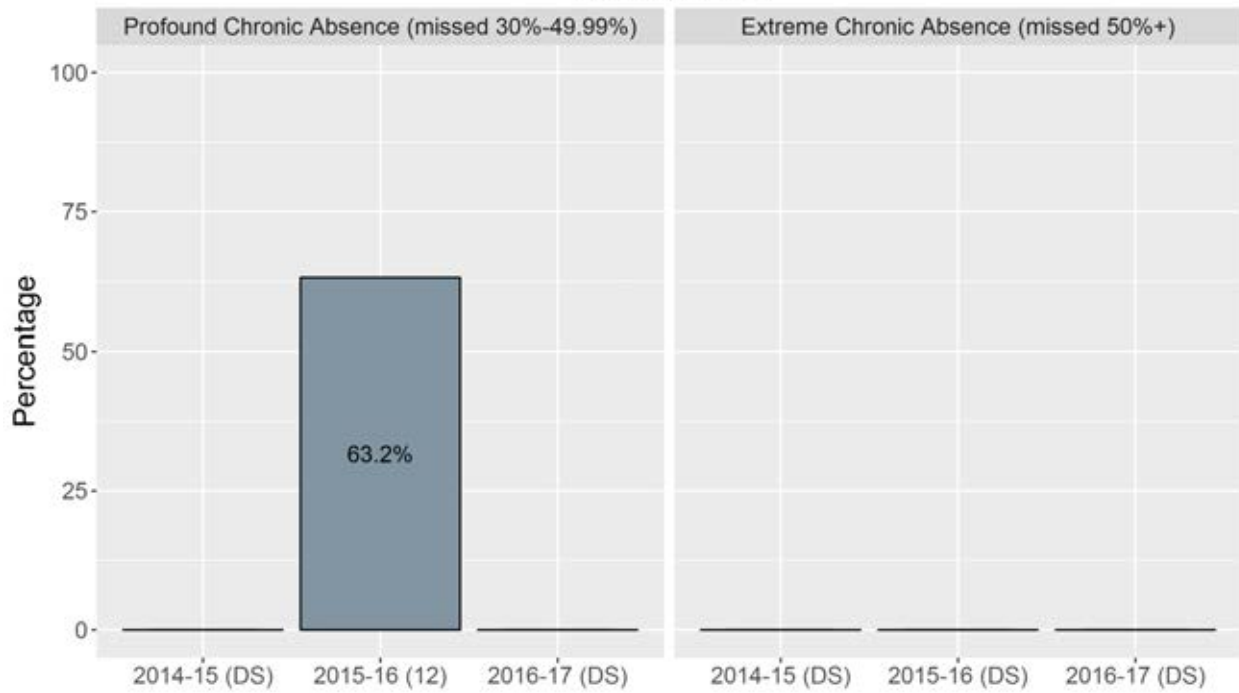
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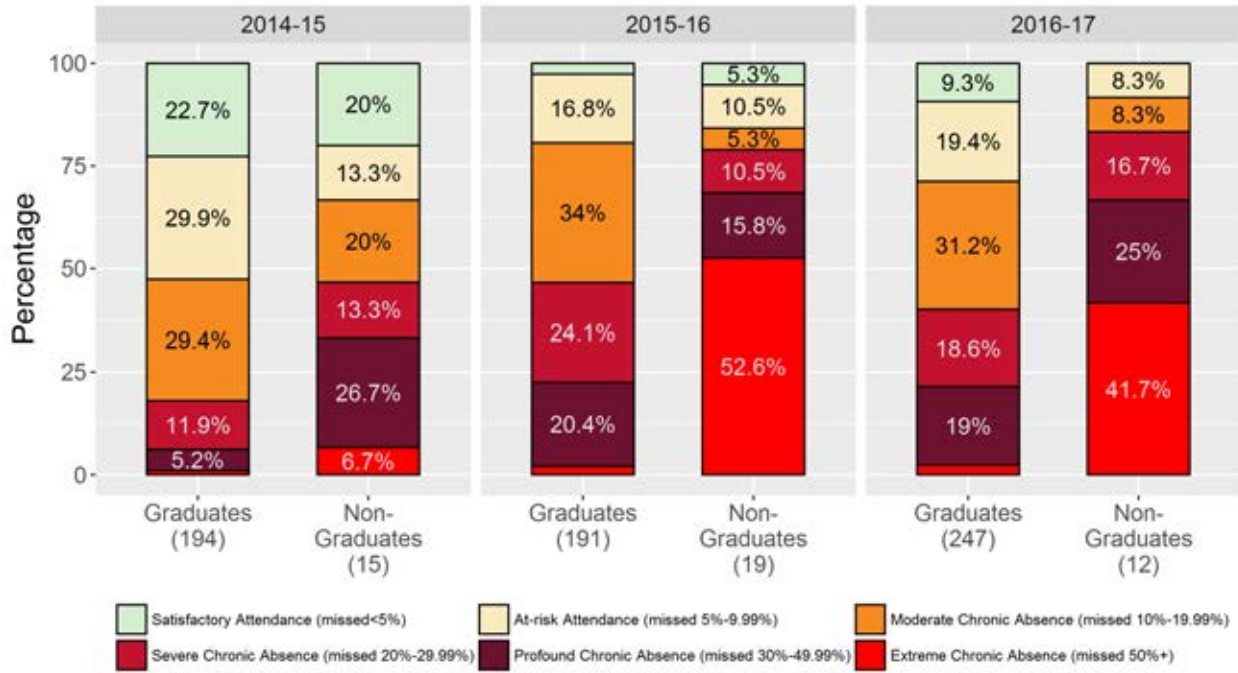
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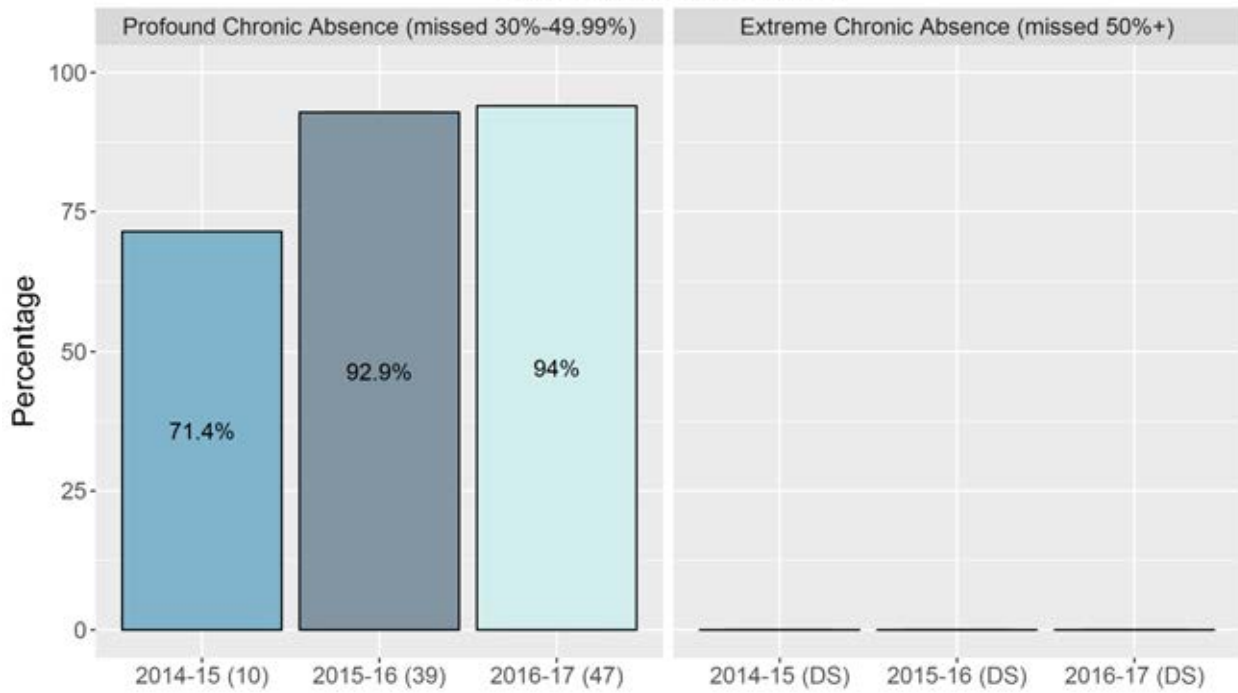
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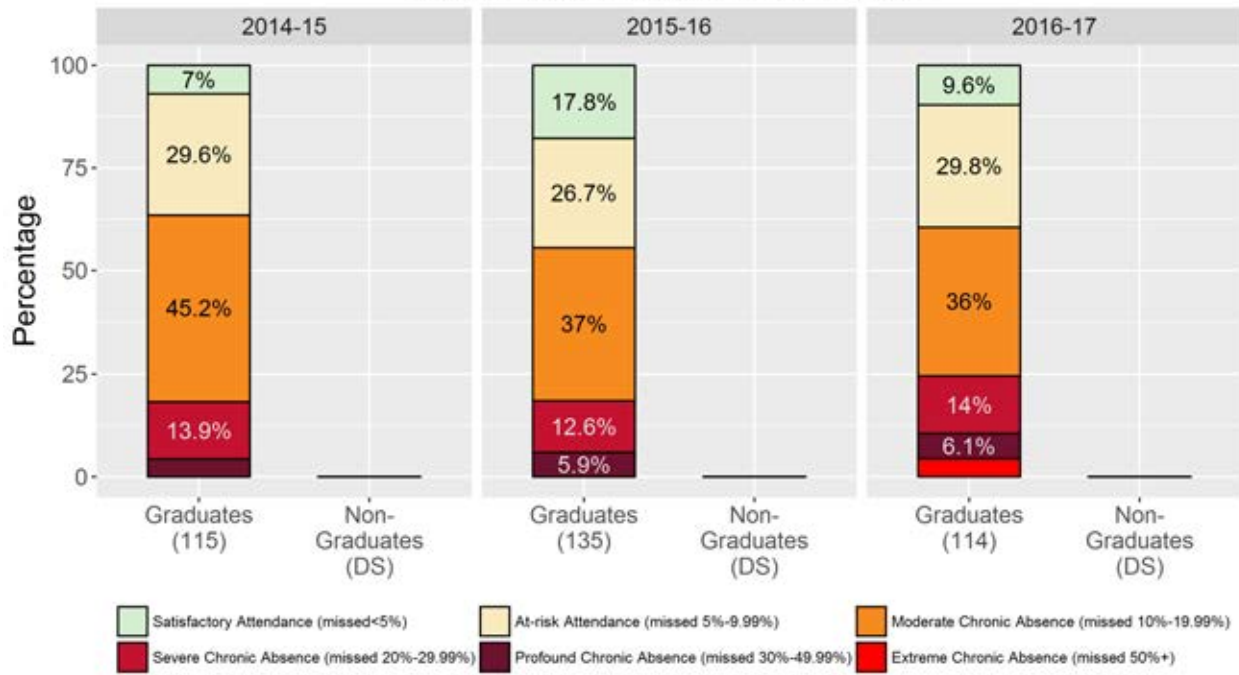
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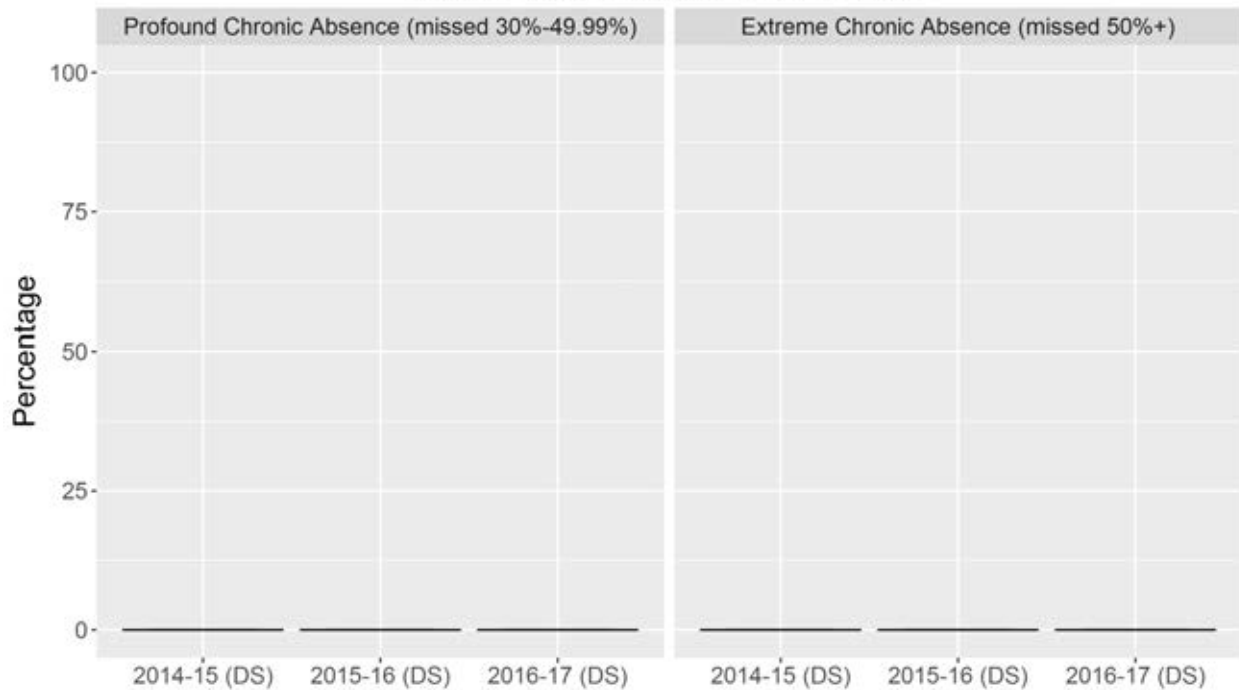
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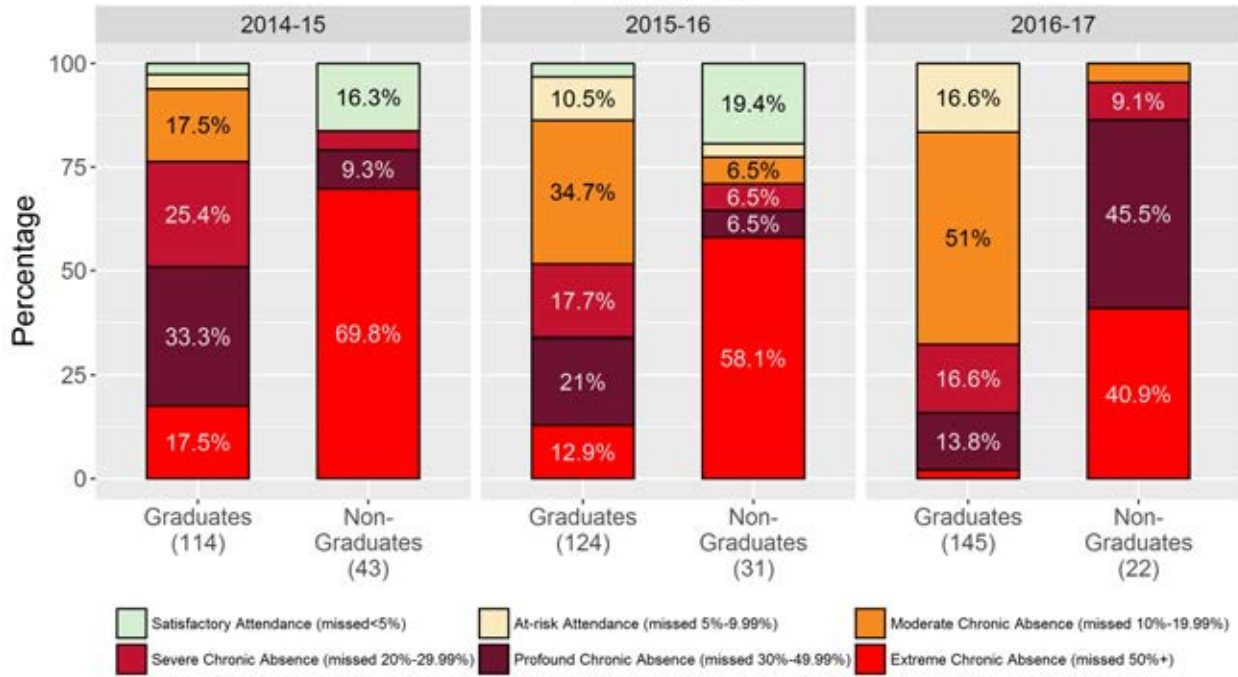
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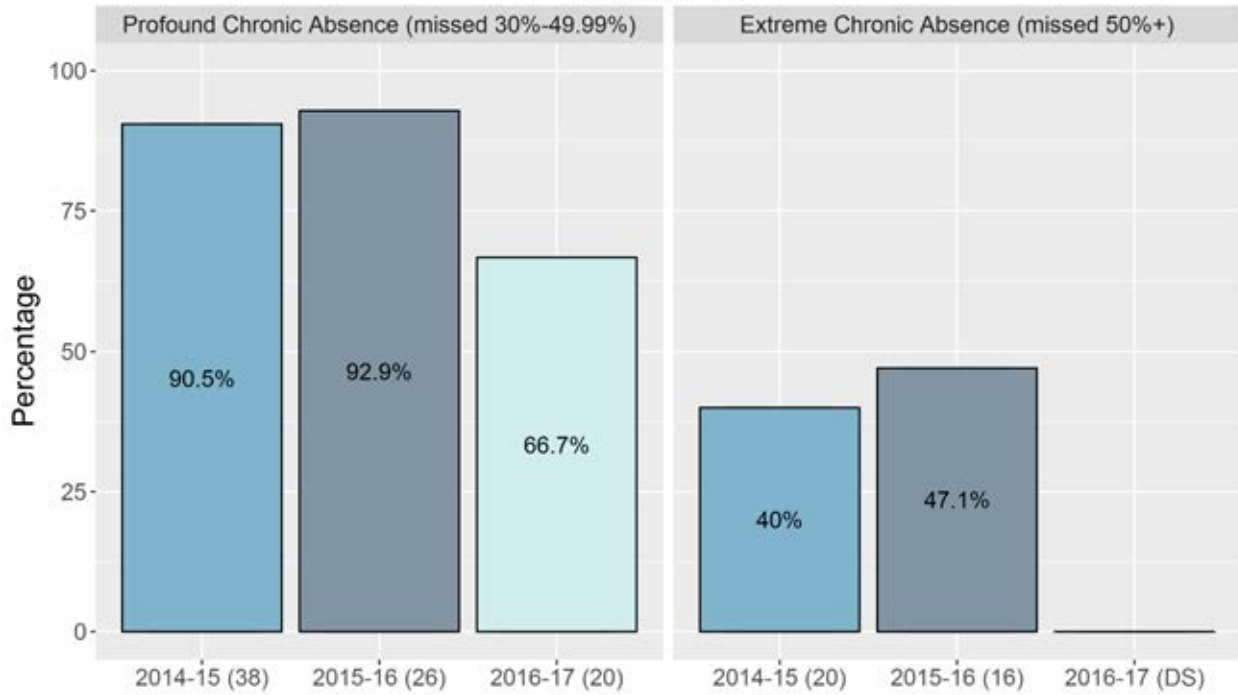
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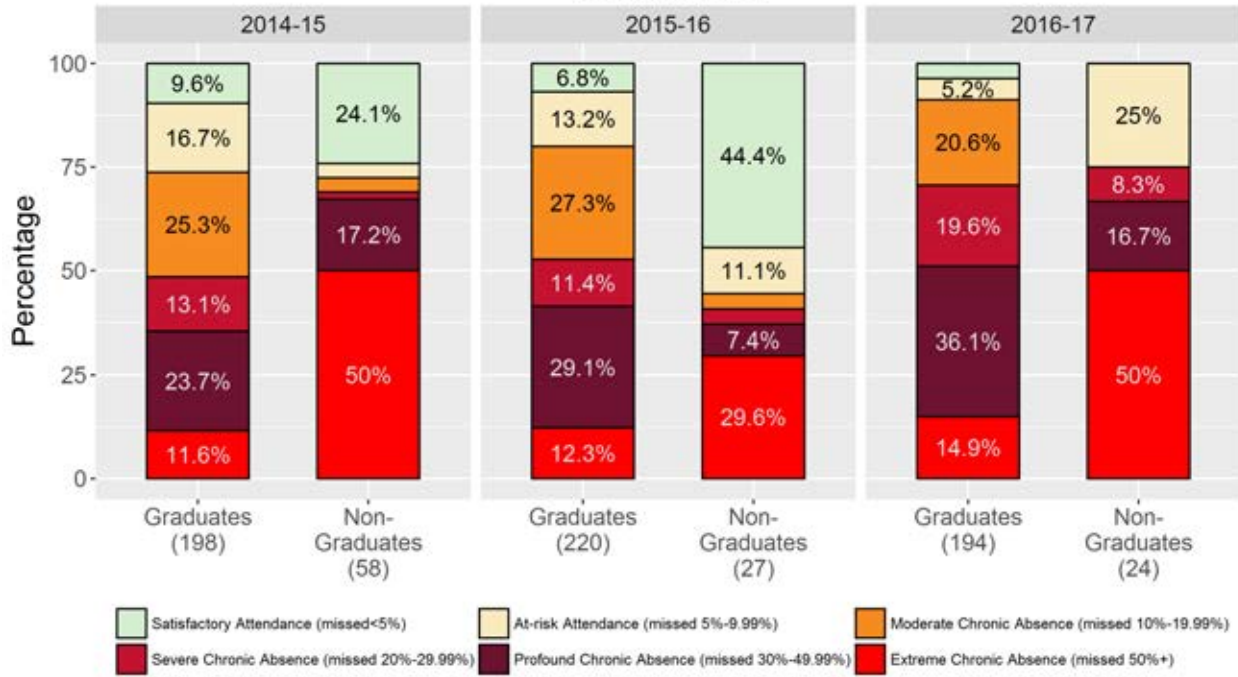
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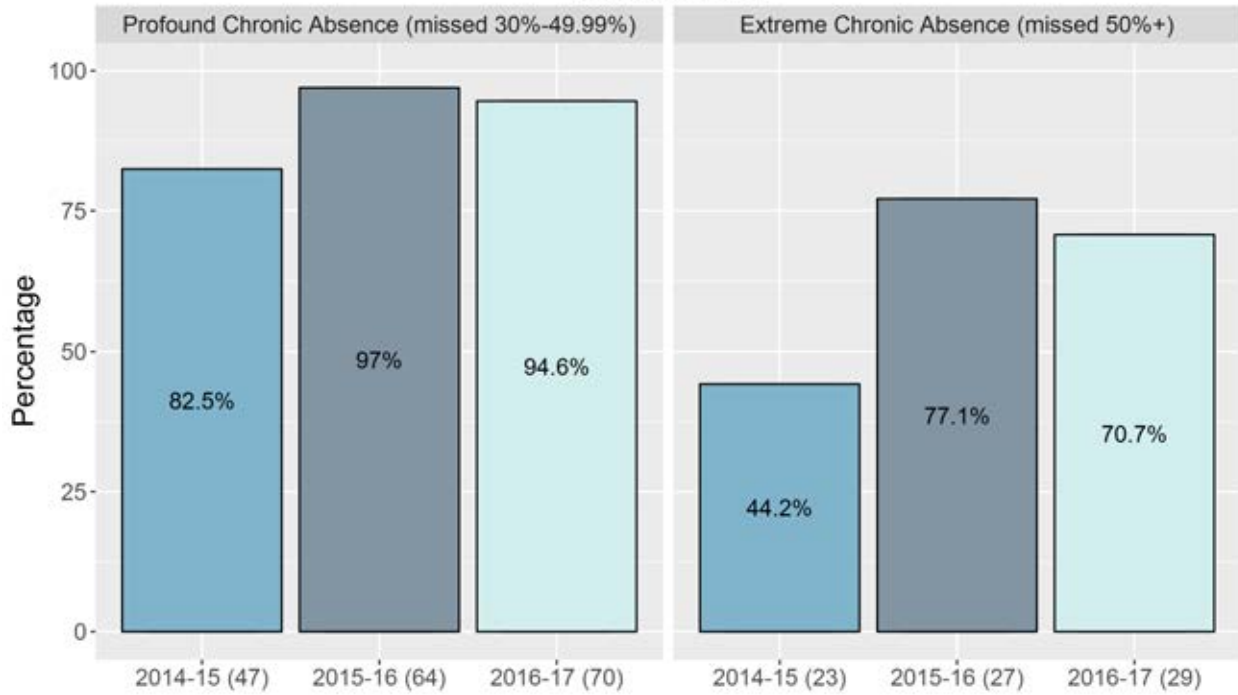
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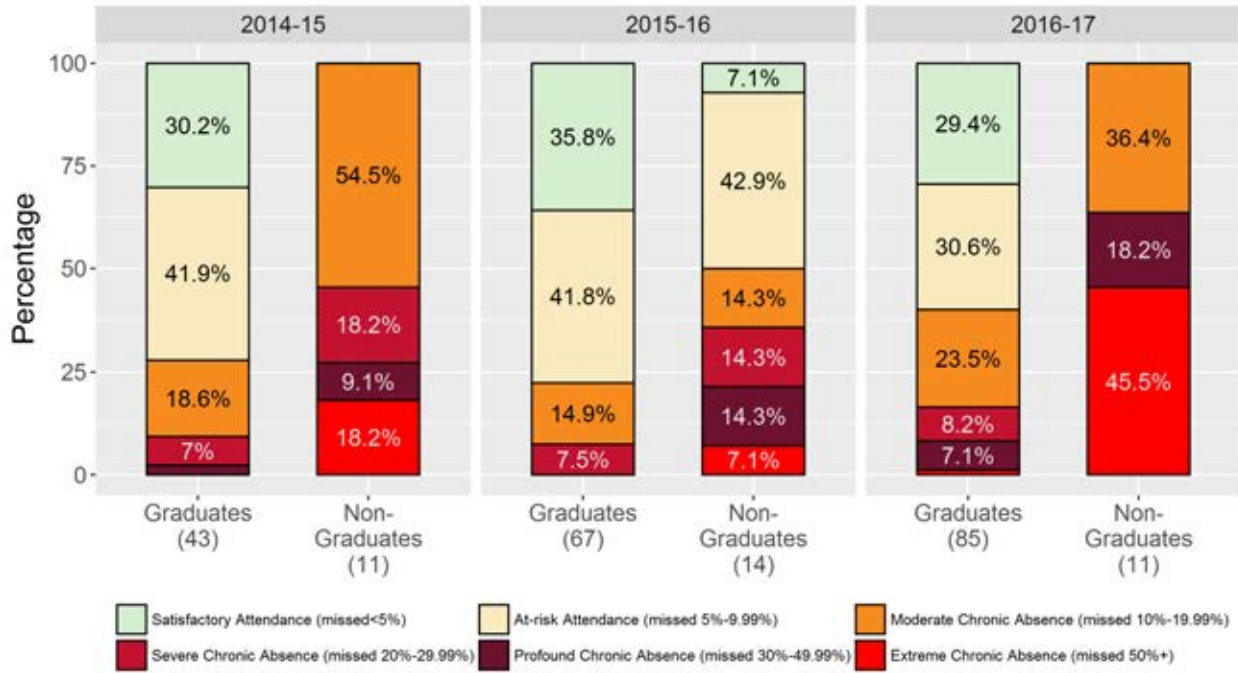
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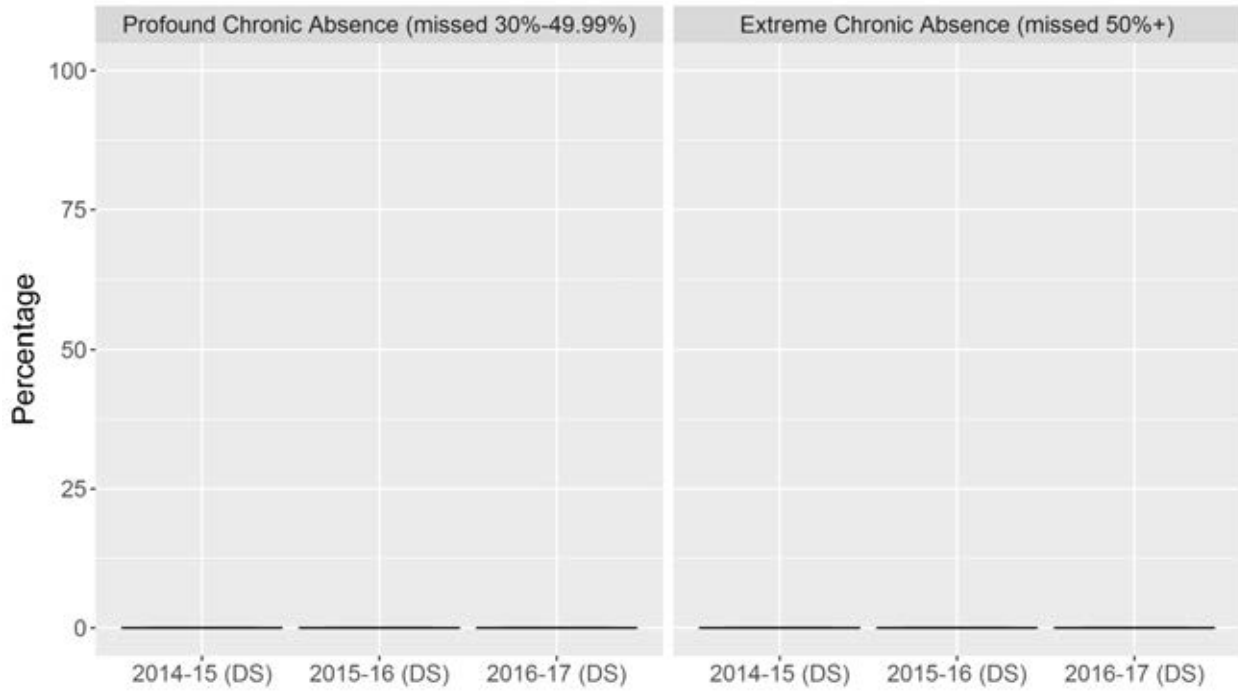
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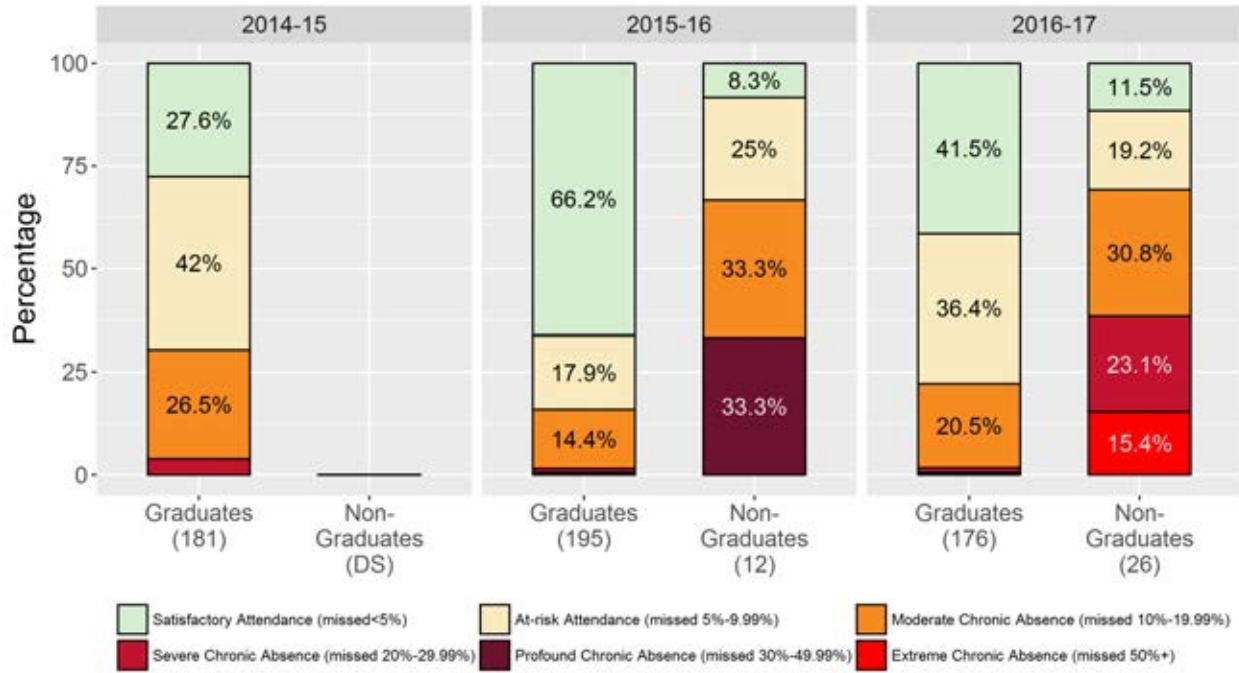
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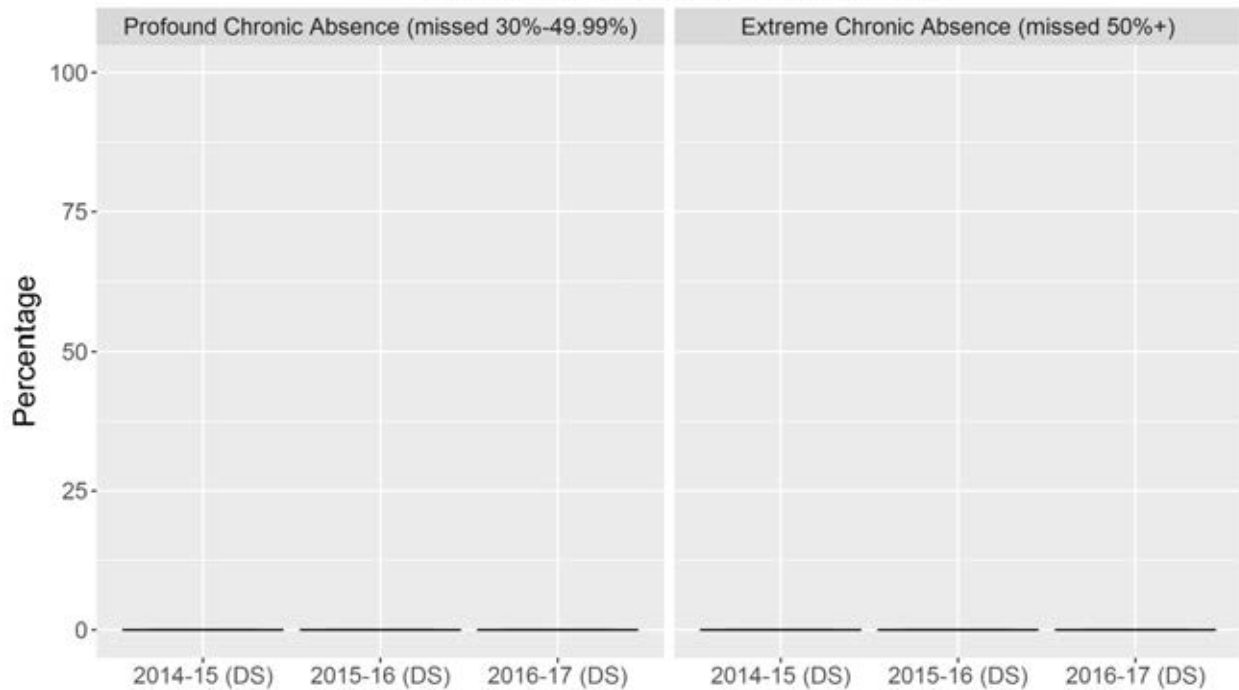
EL Haynes PCS High School



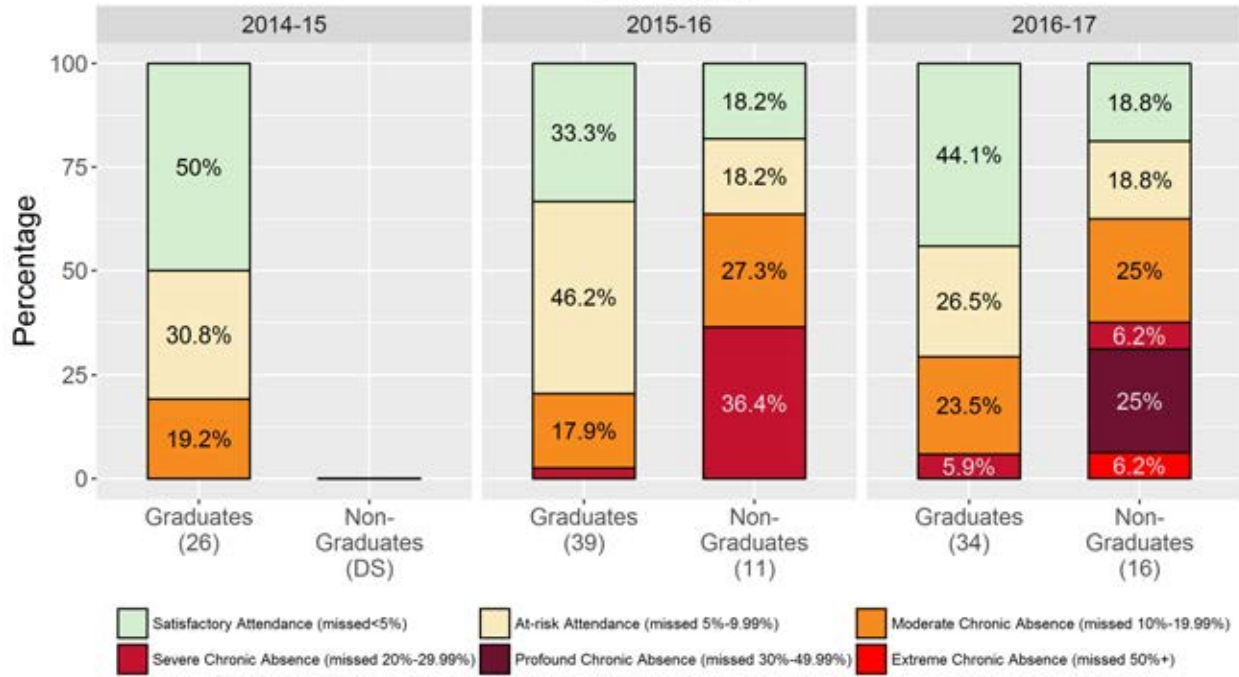
Friendship PCS Collegiate Academy



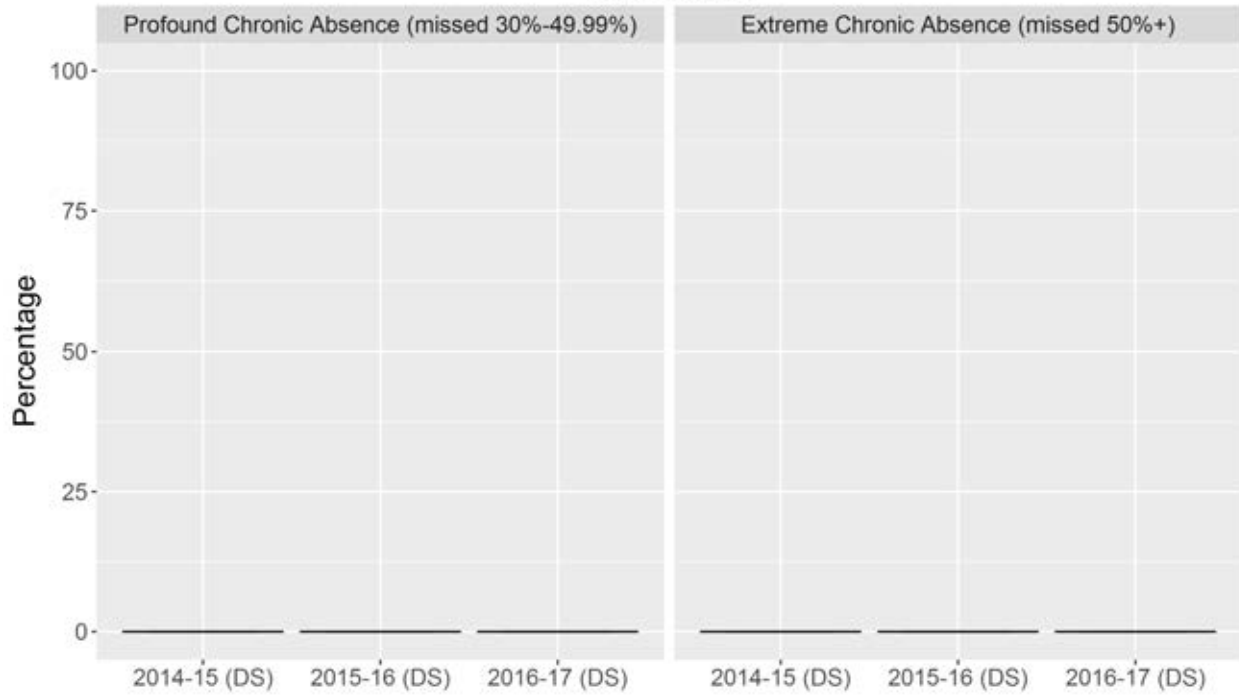
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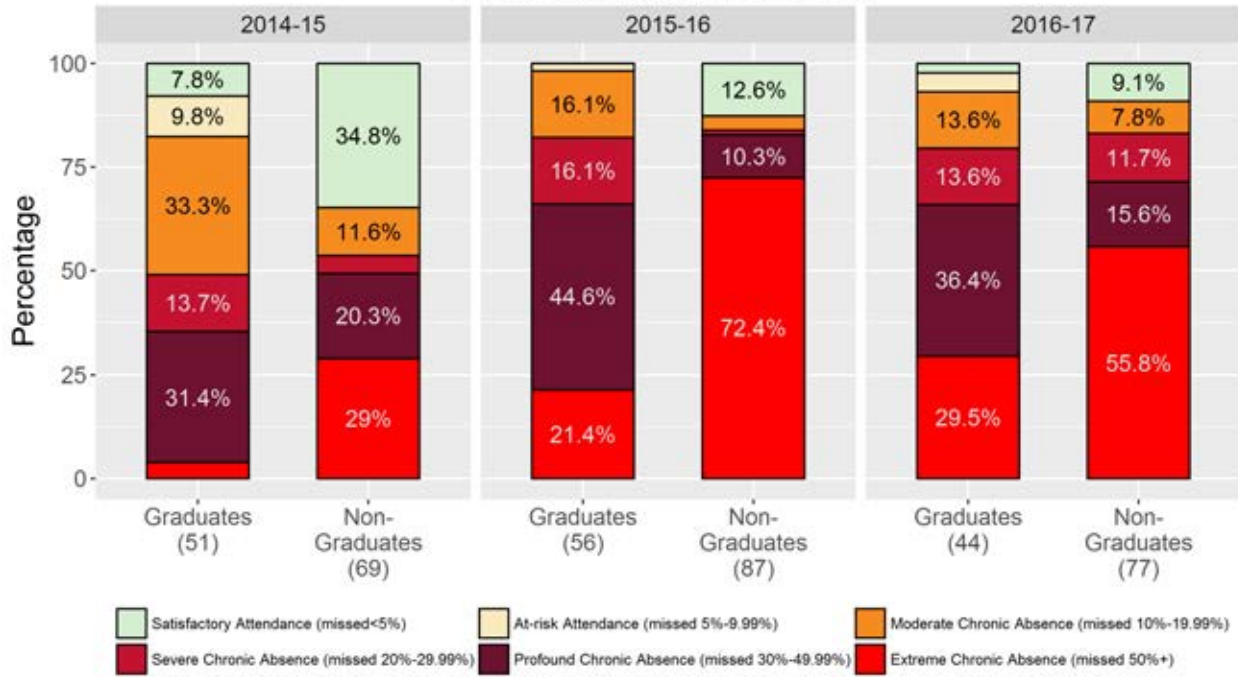
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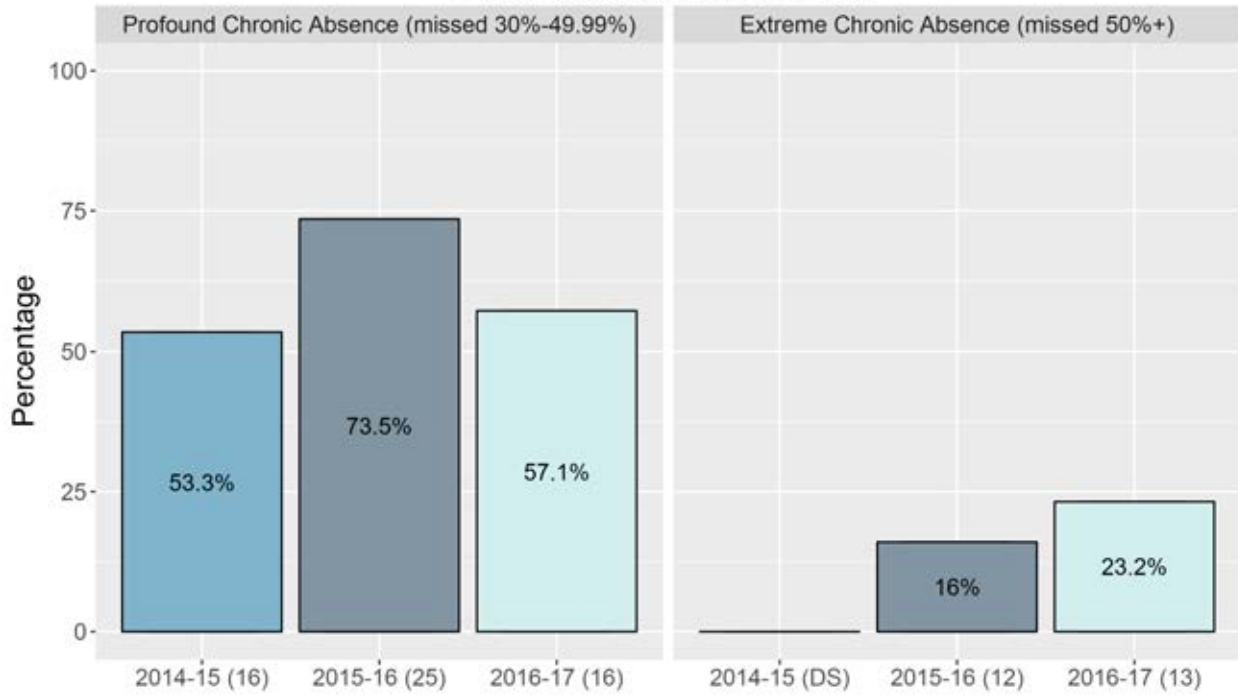
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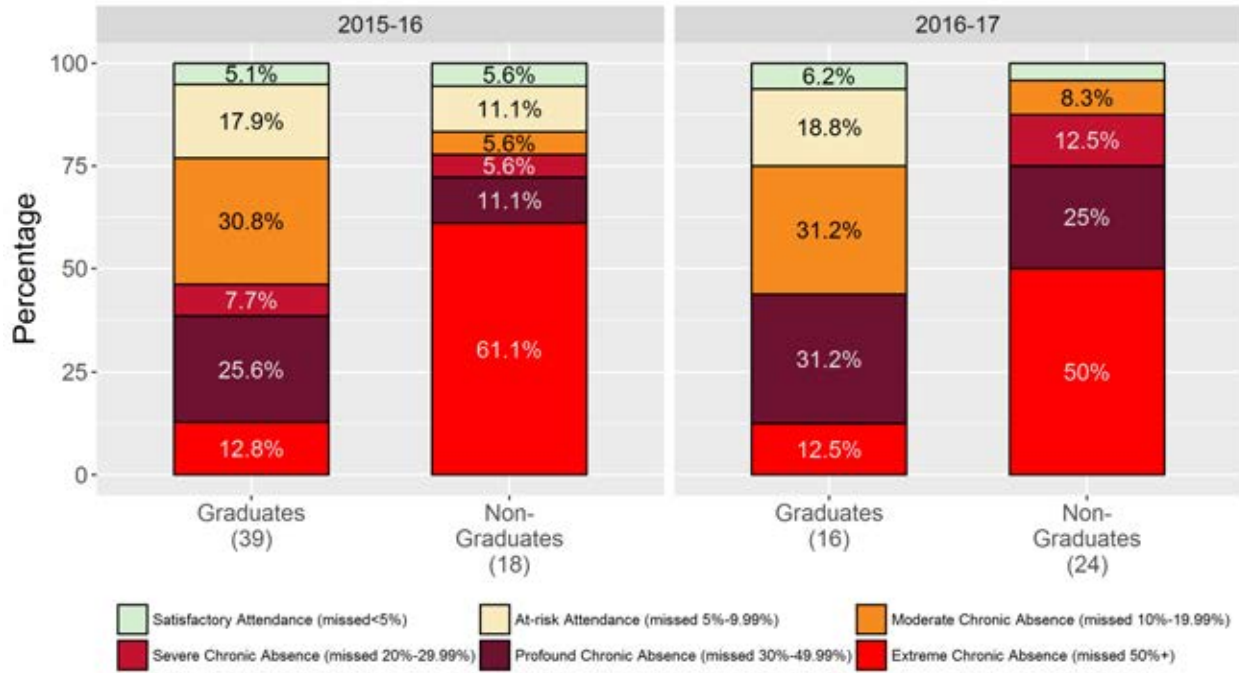
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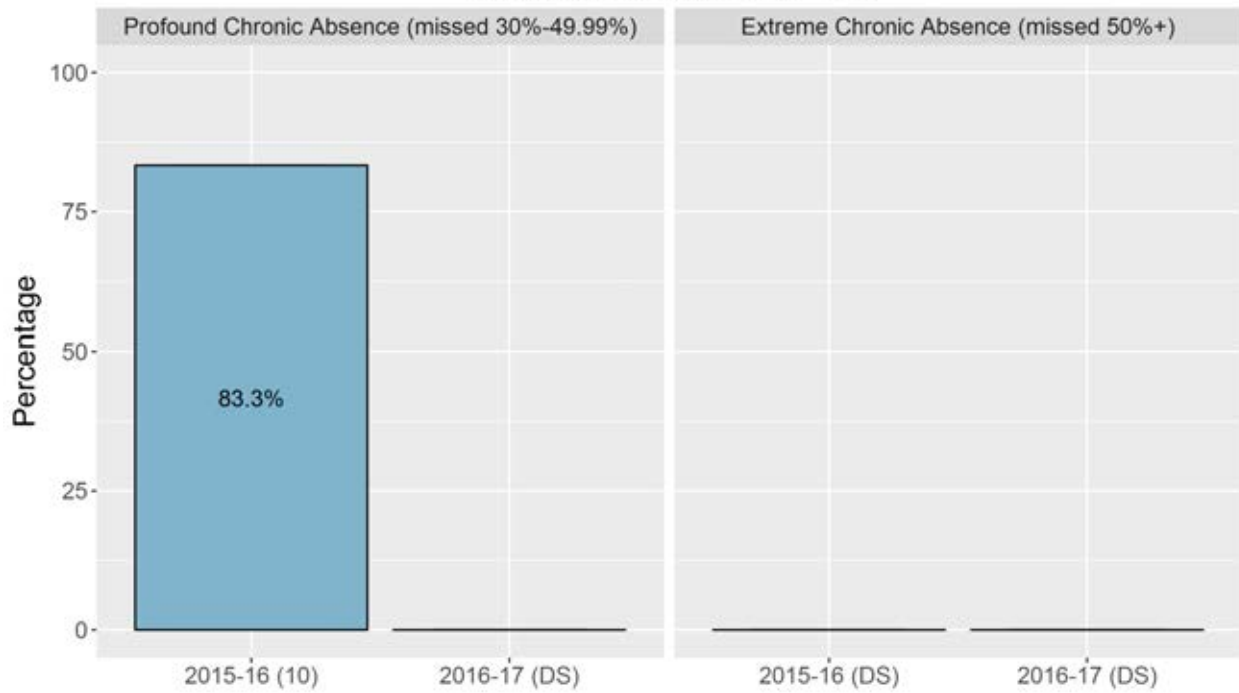
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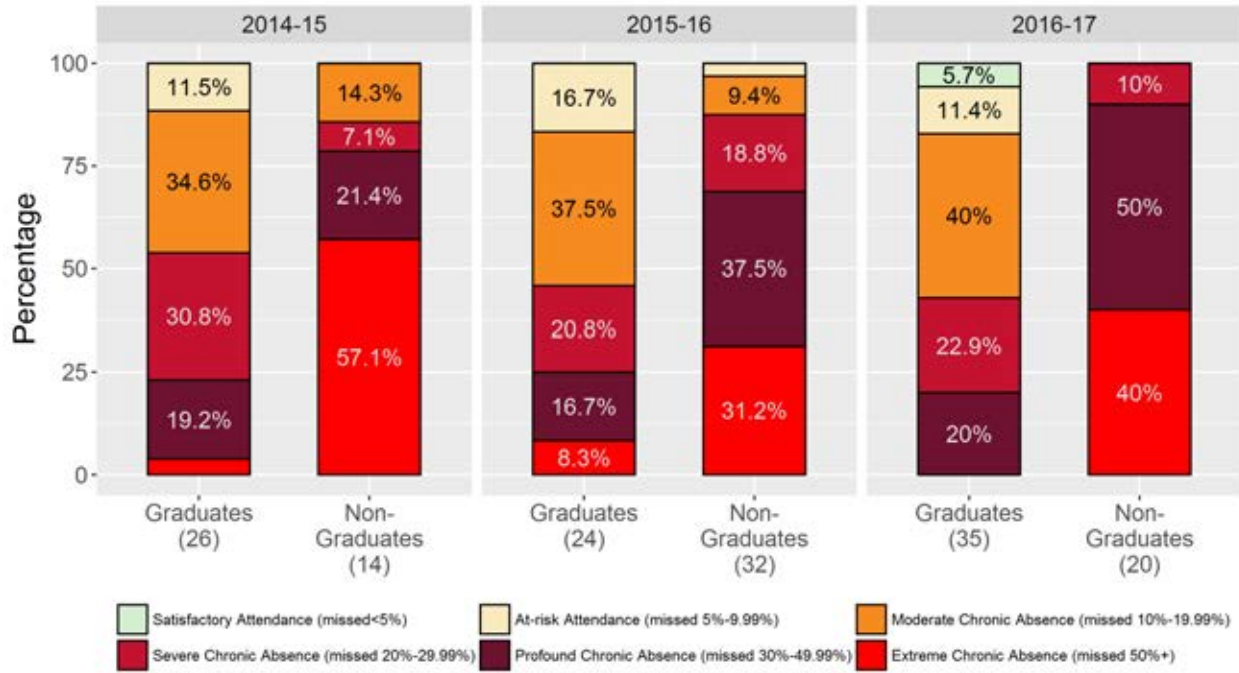
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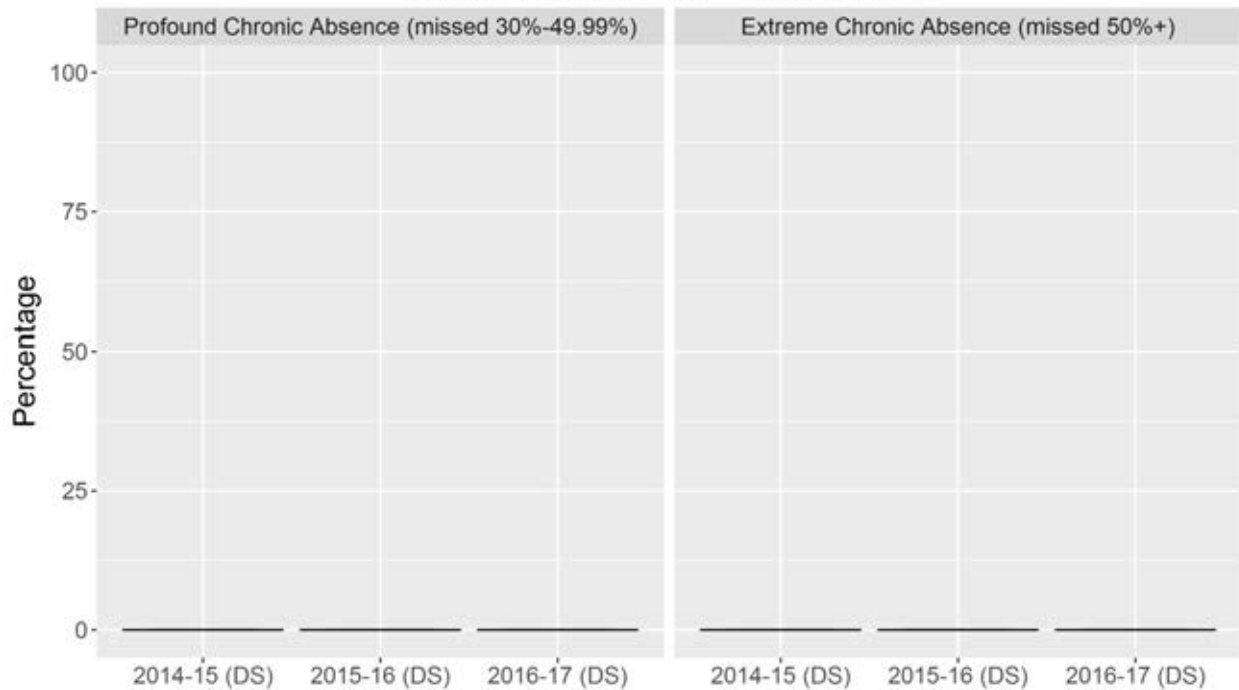
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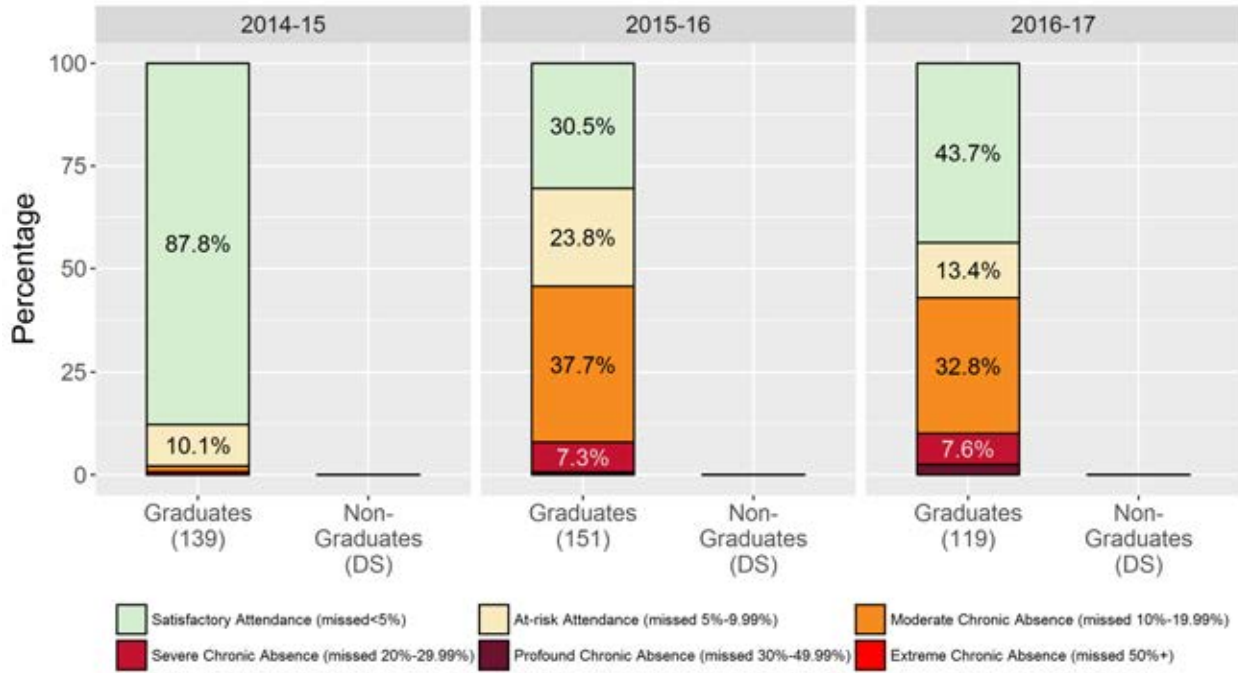
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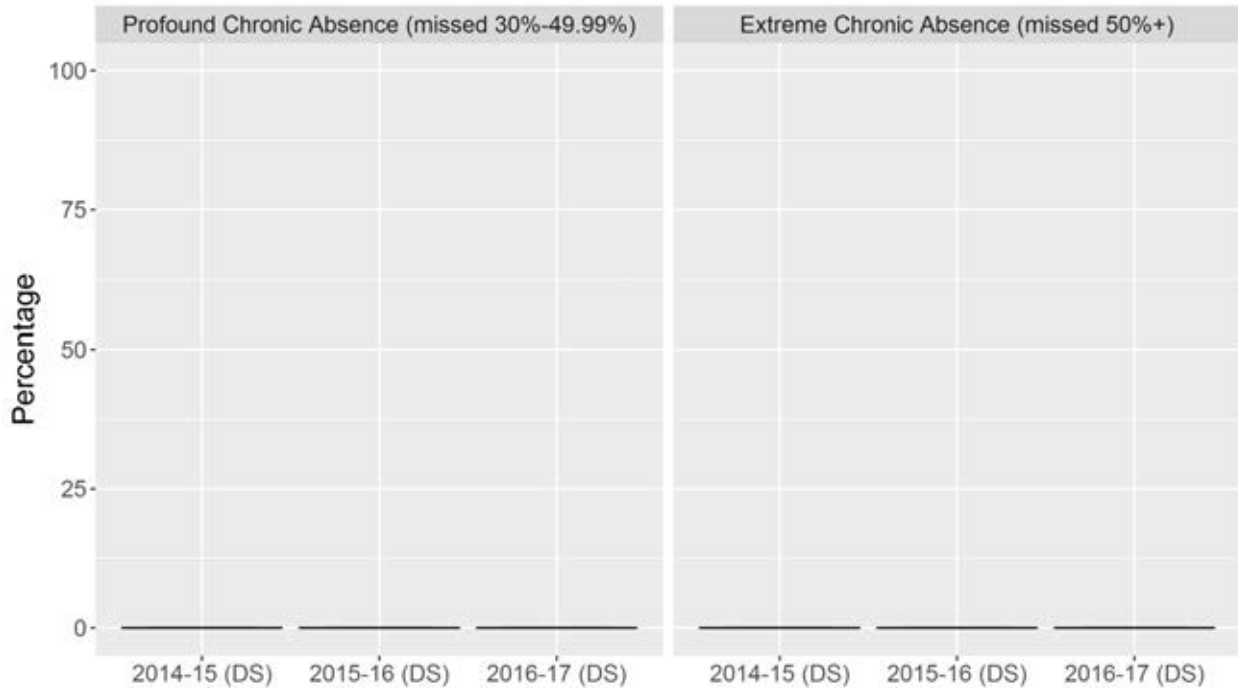
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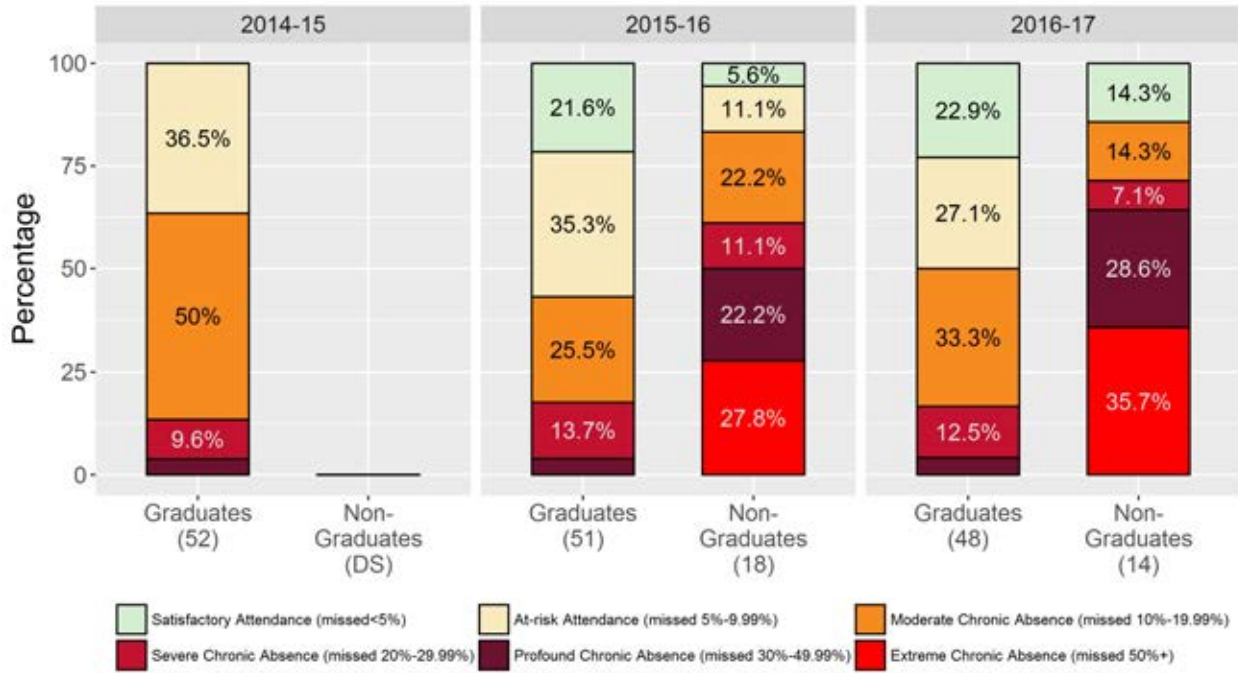
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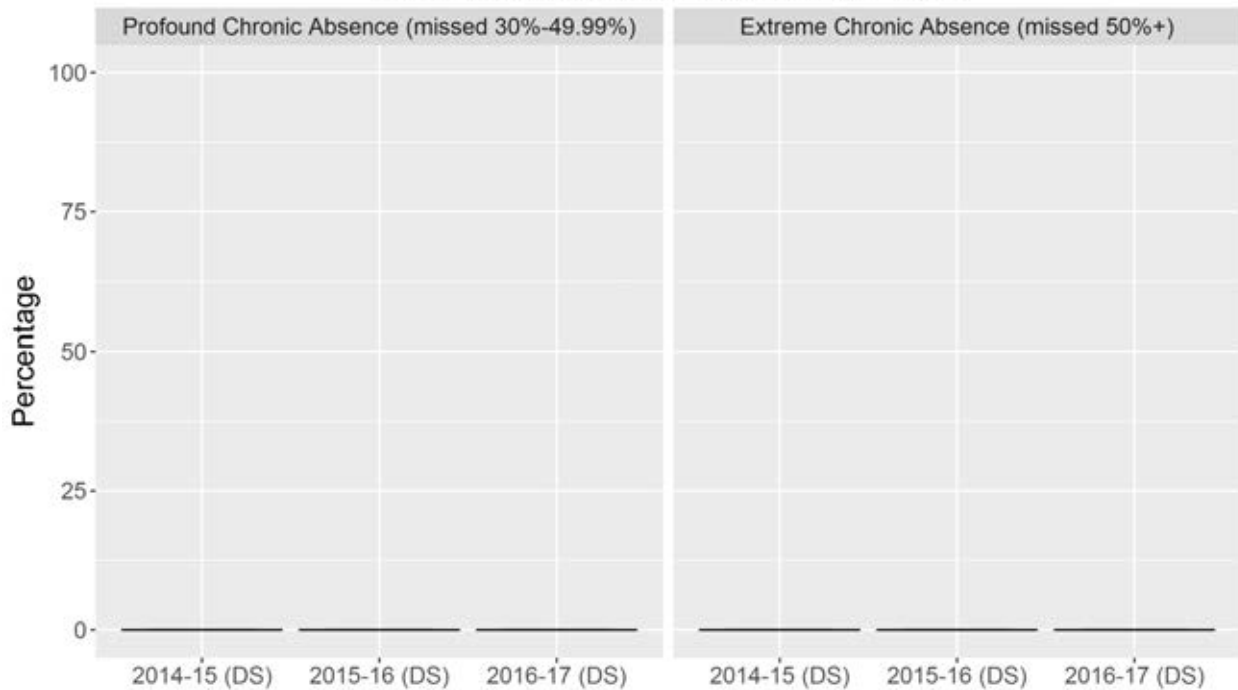
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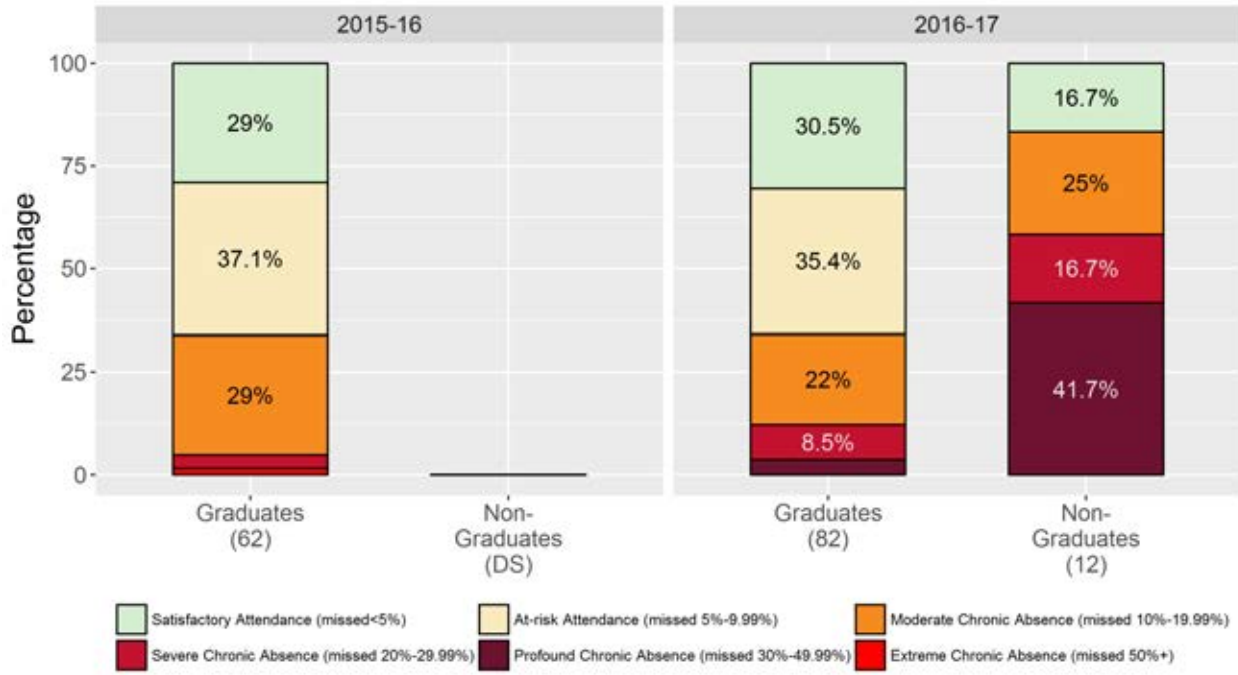
National Collegiate Preparatory PCHS



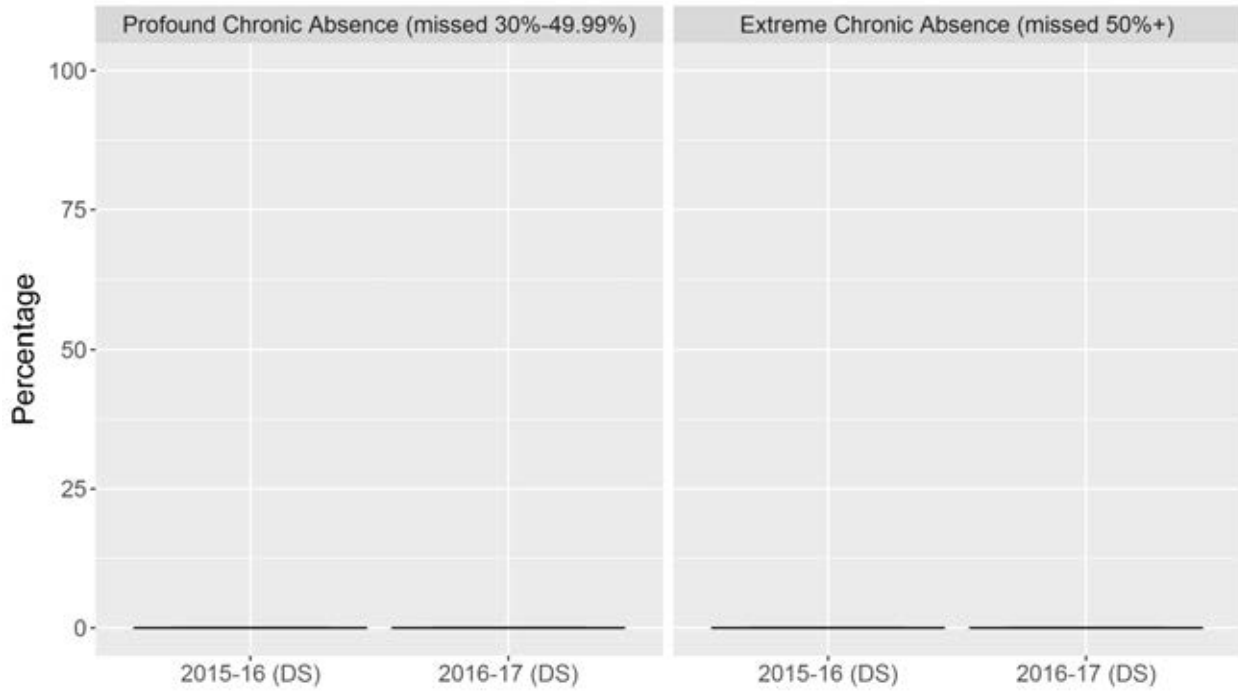
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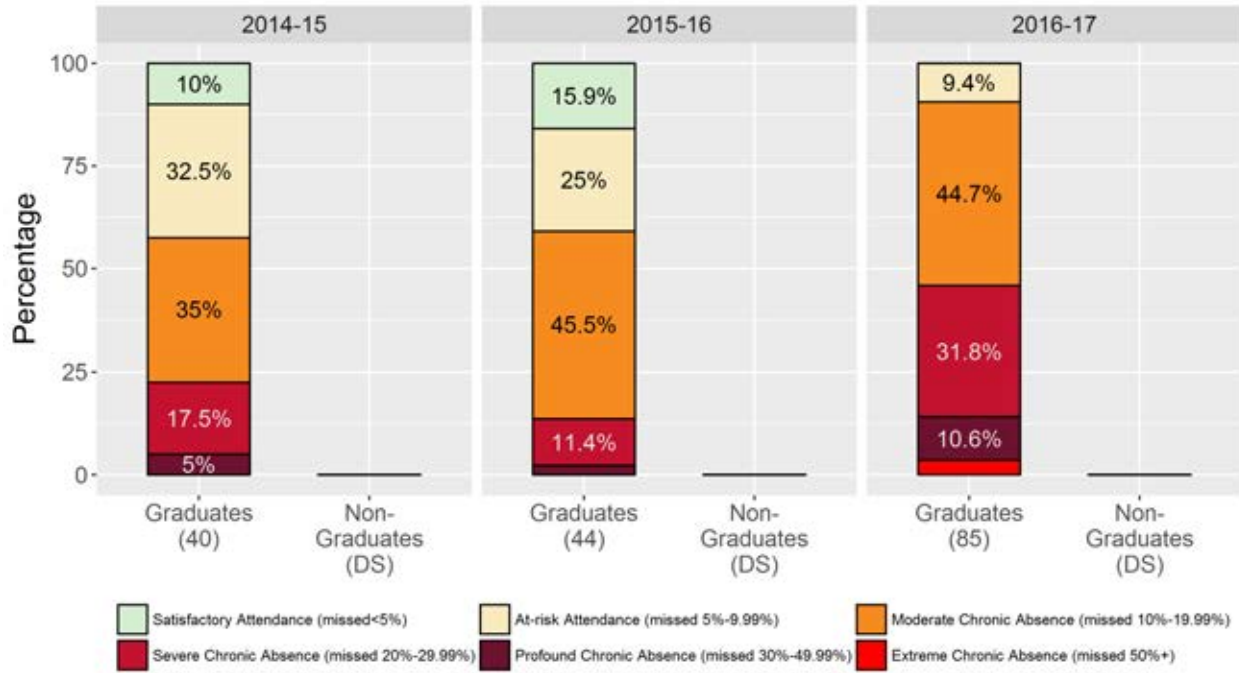
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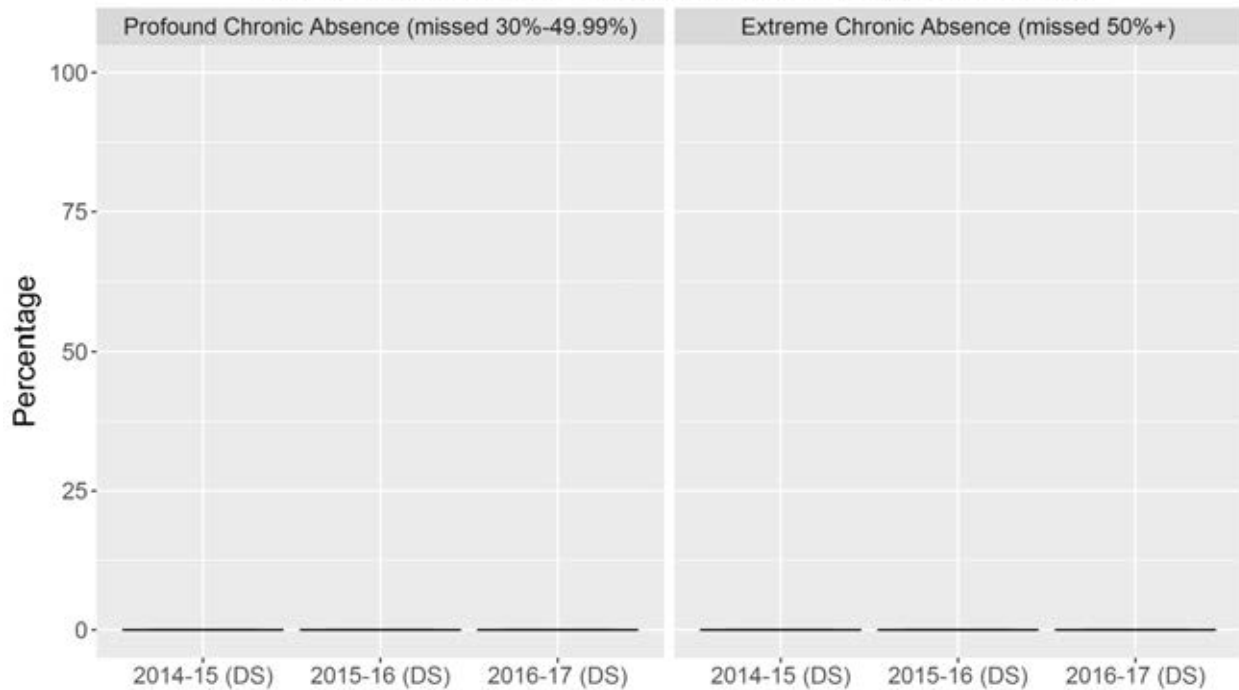
Paul PCS International High School



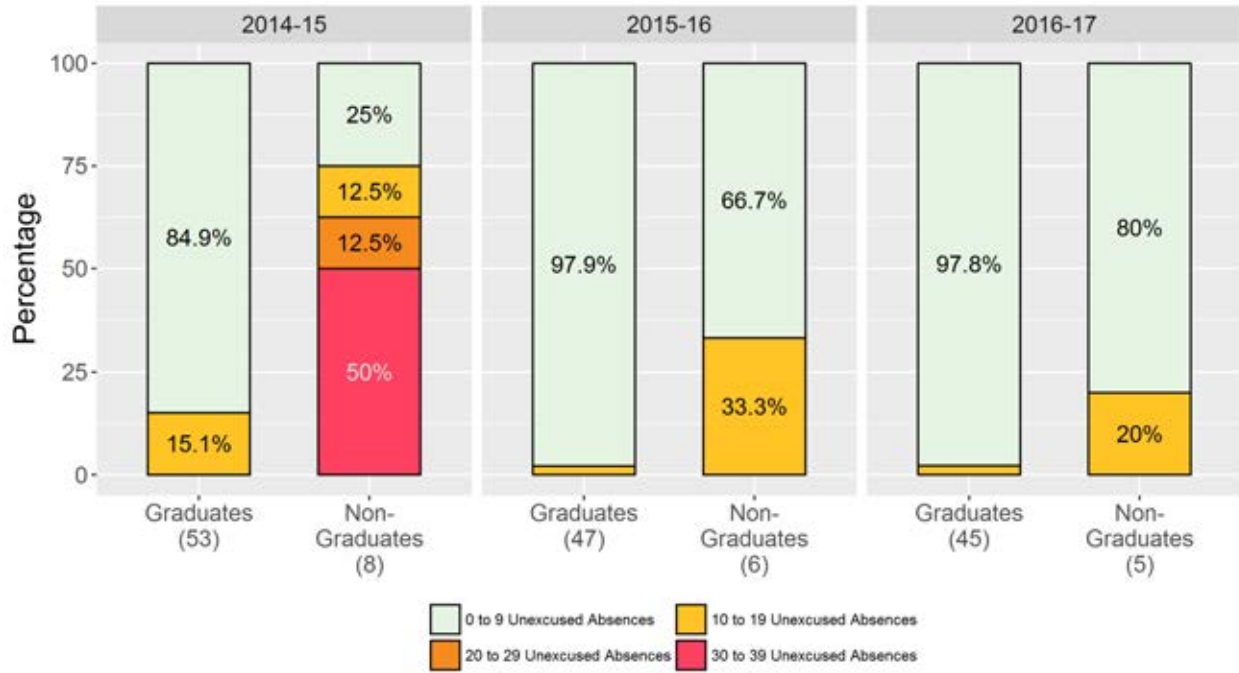
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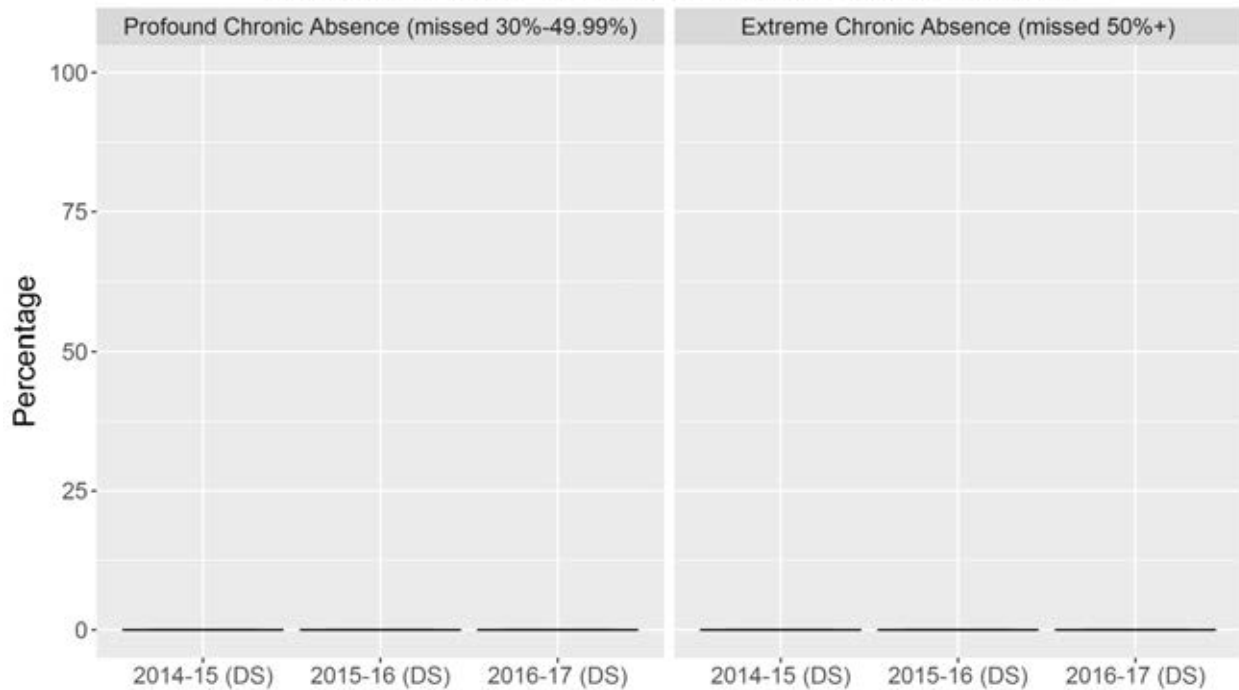
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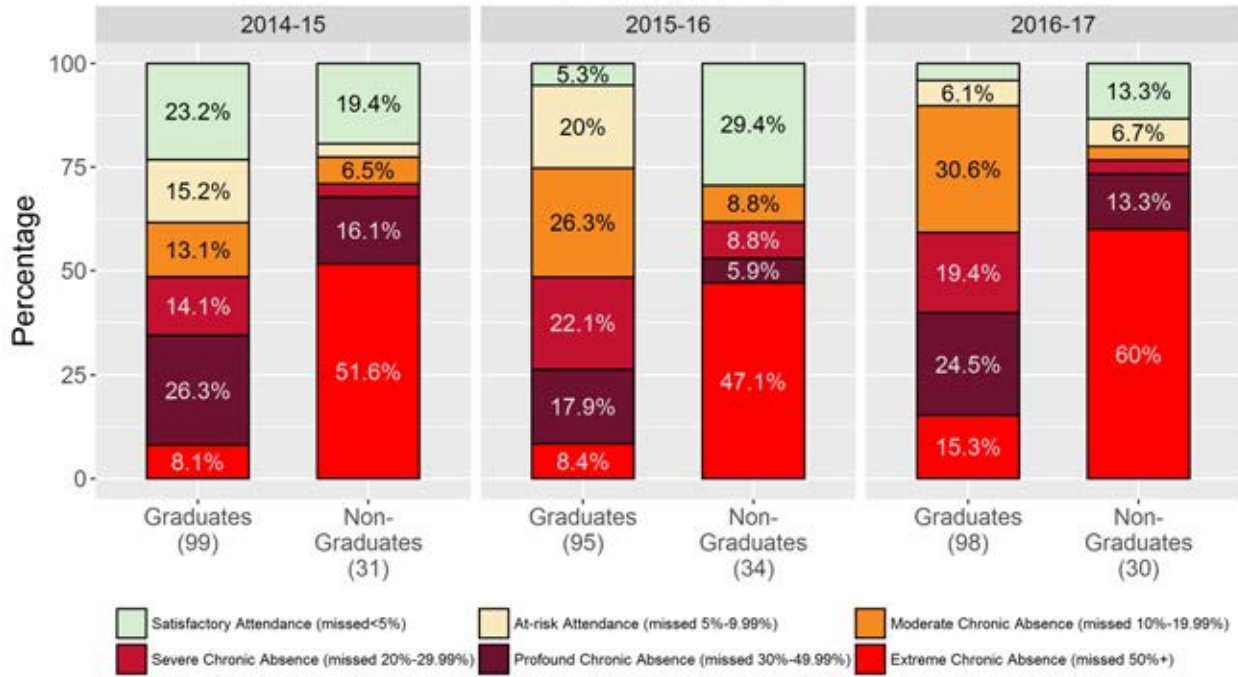
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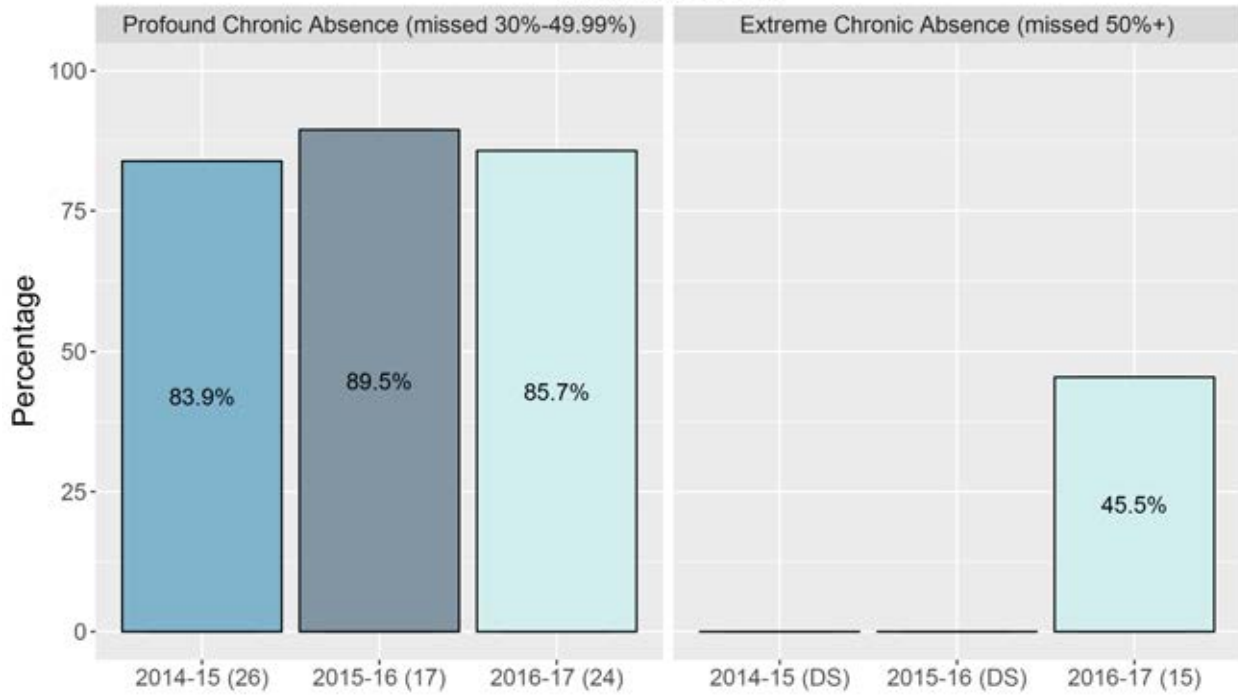
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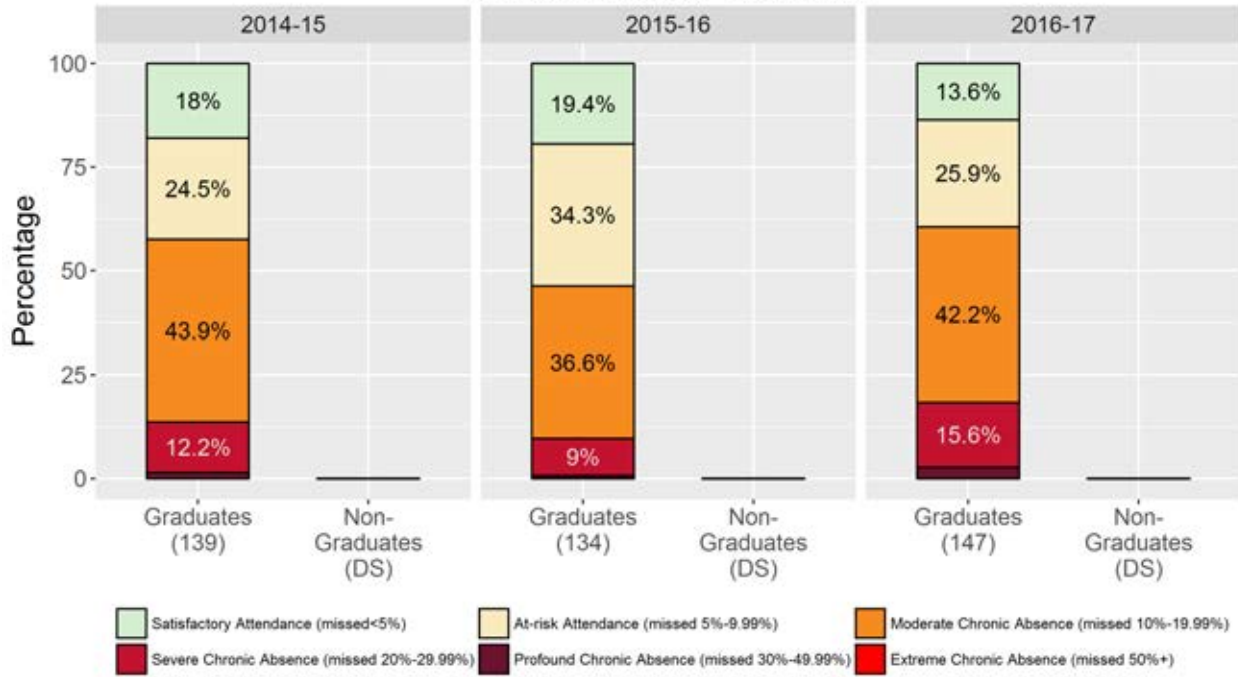
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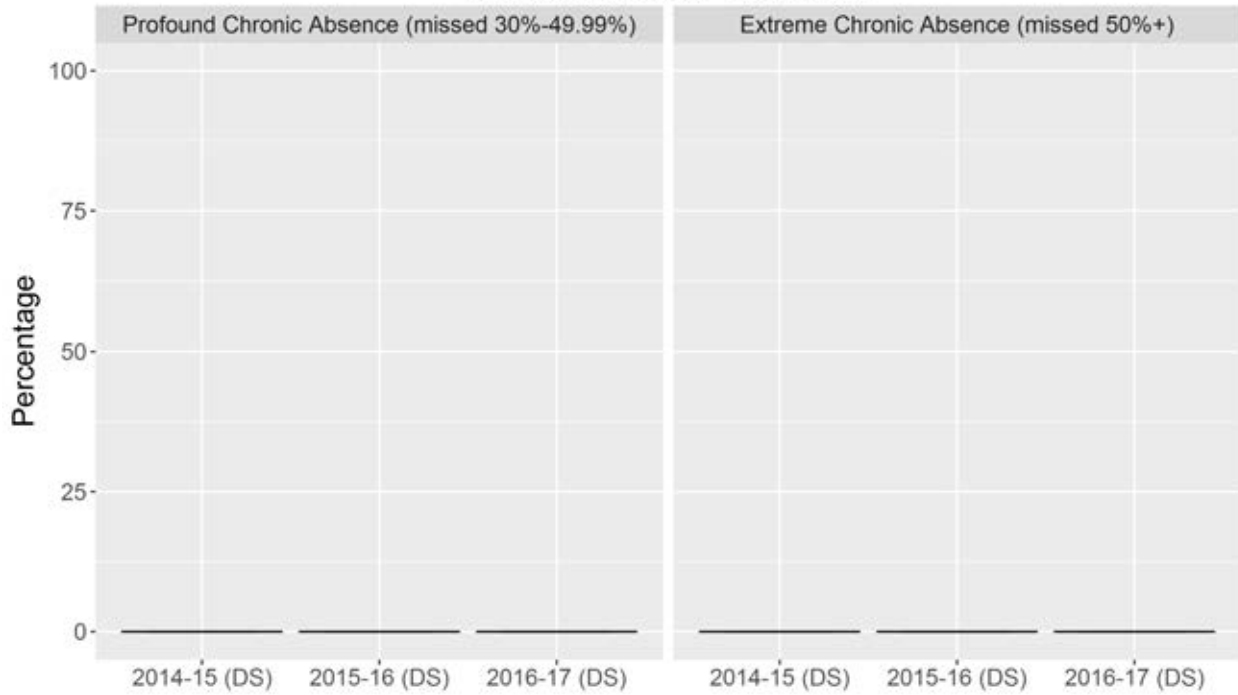
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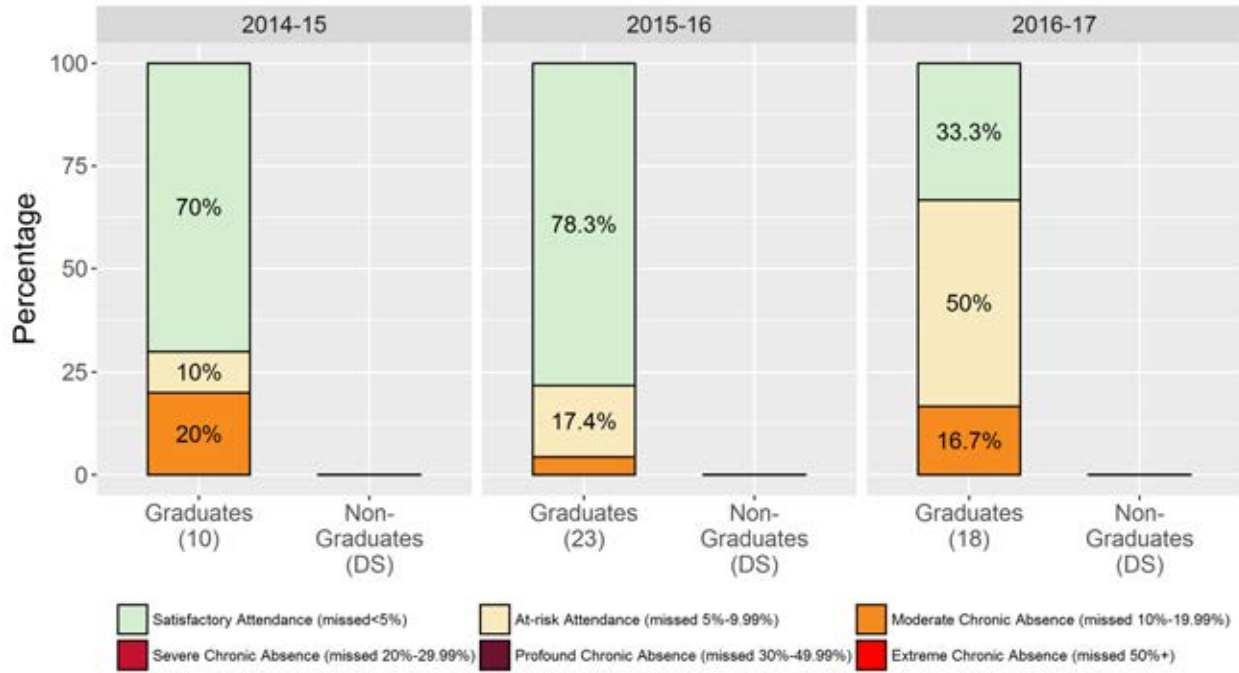
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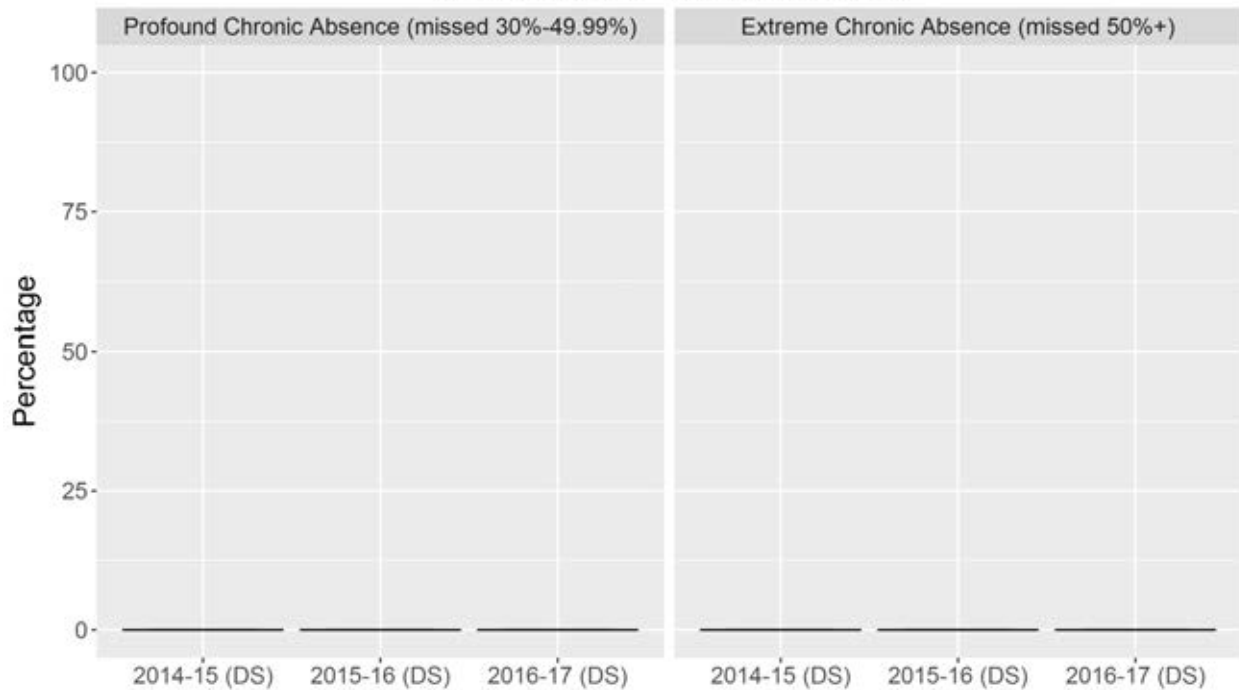
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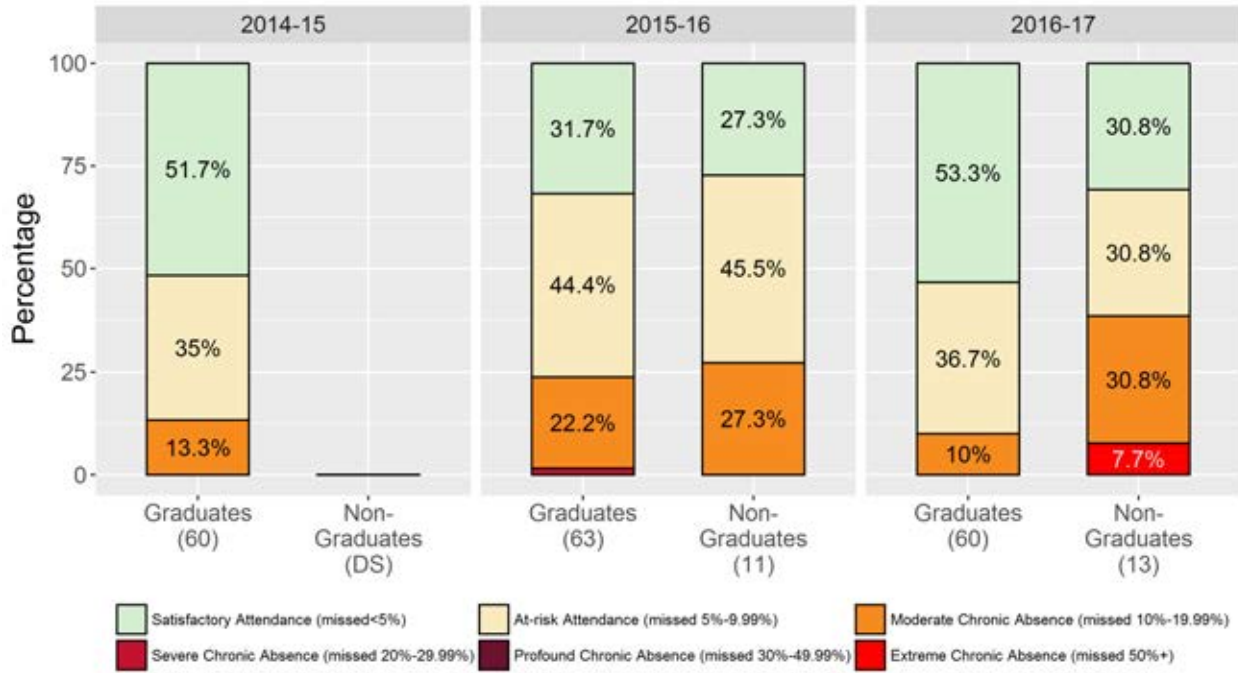
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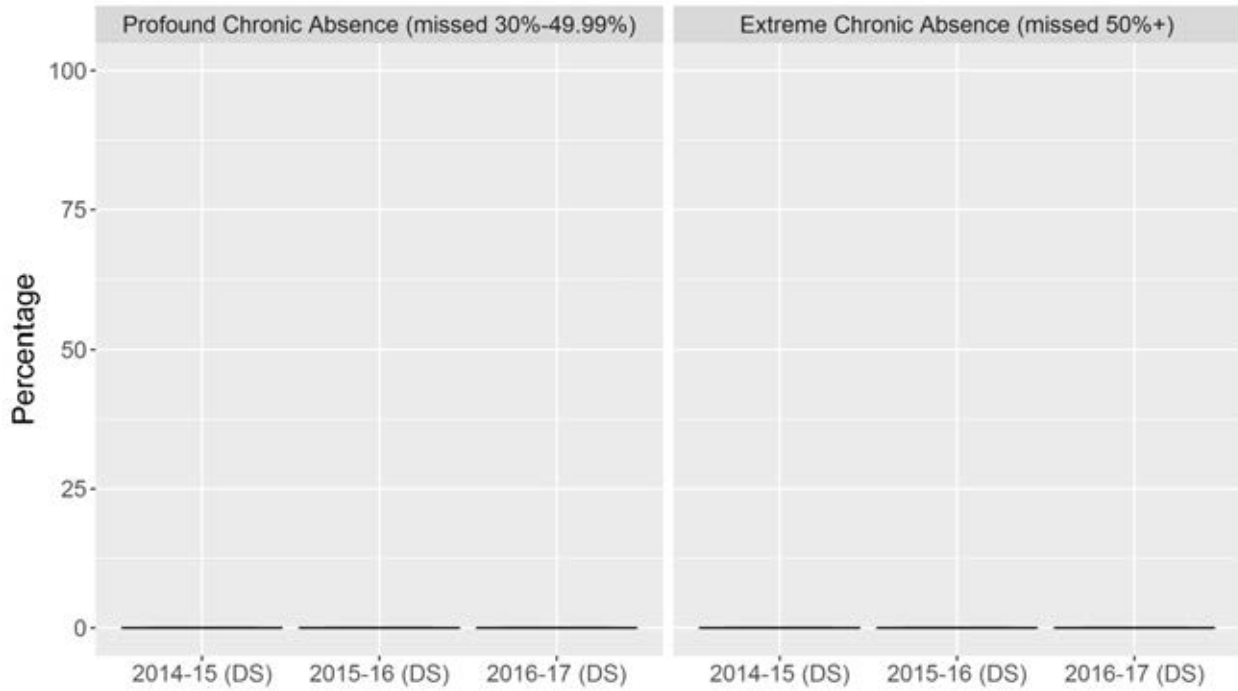
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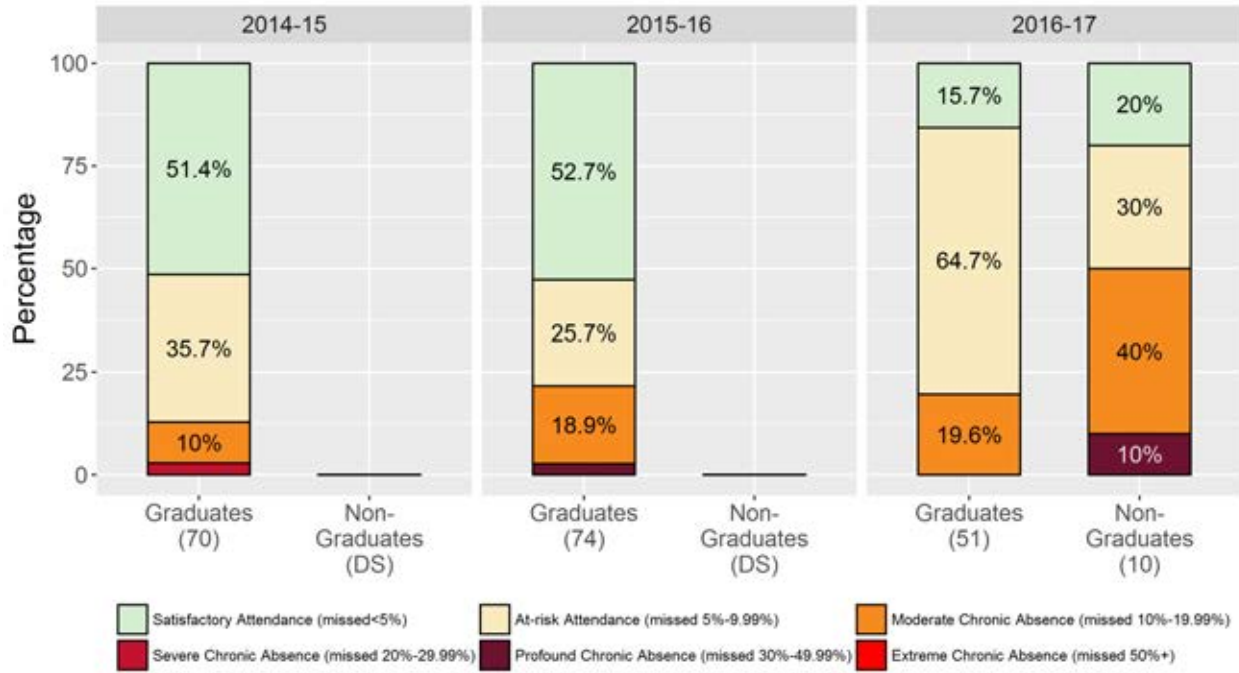
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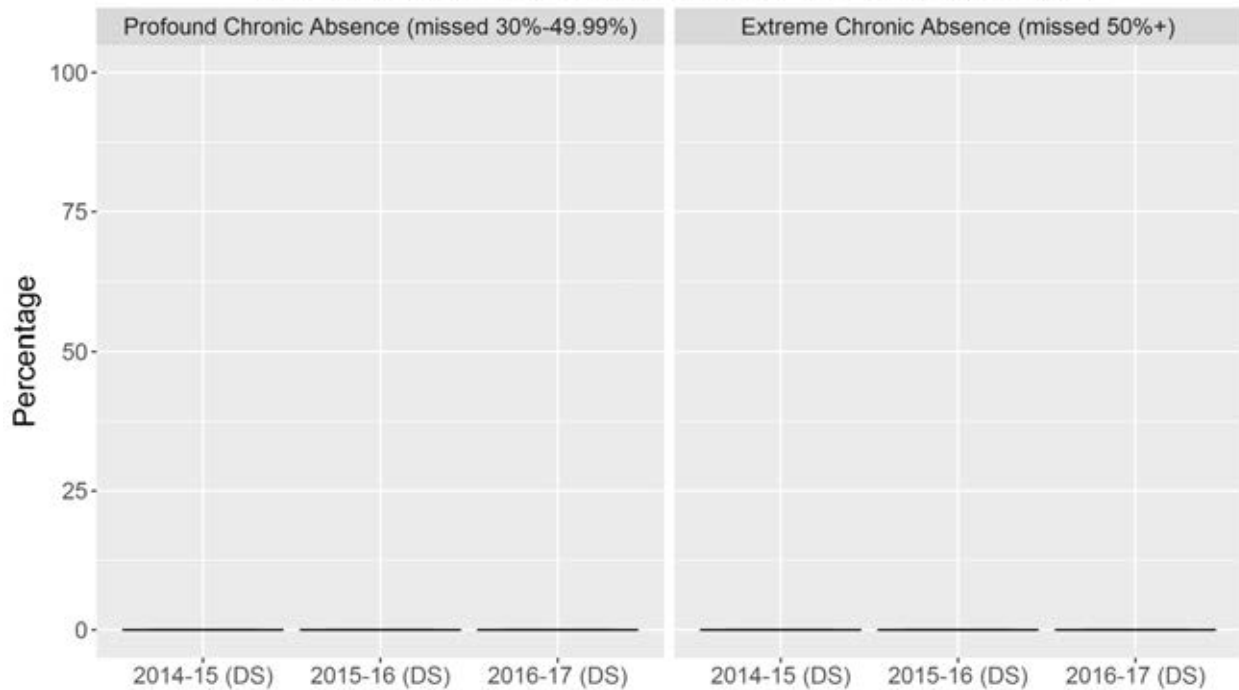
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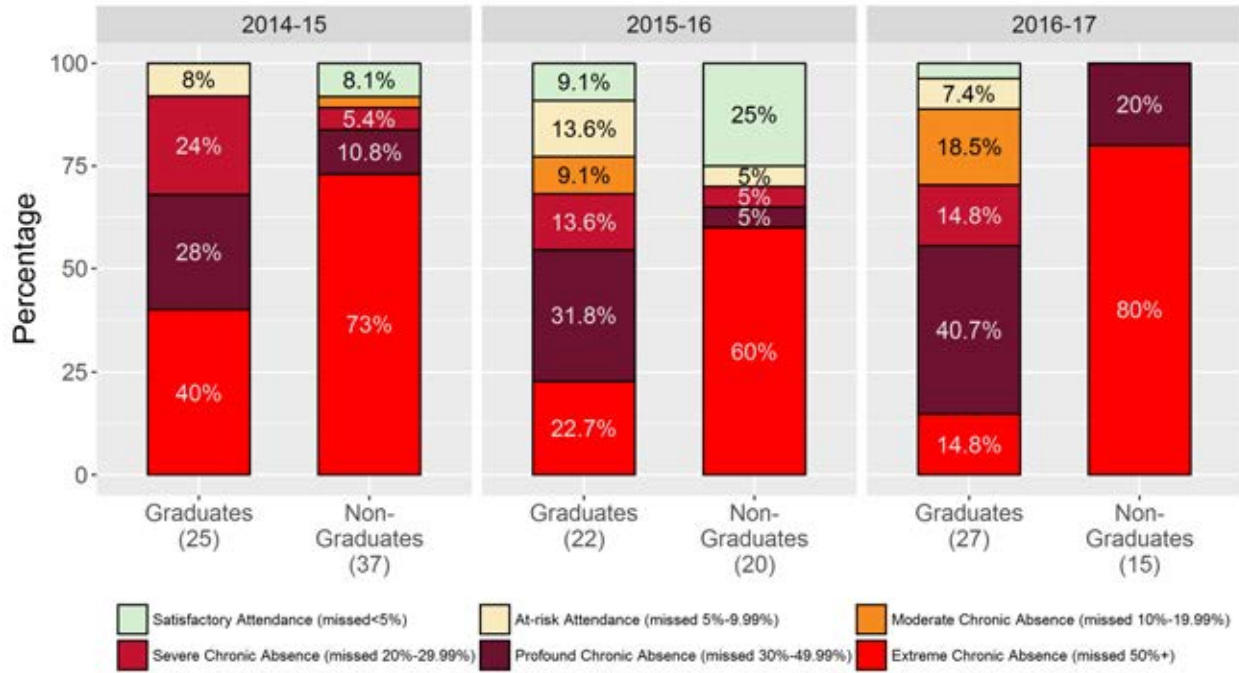
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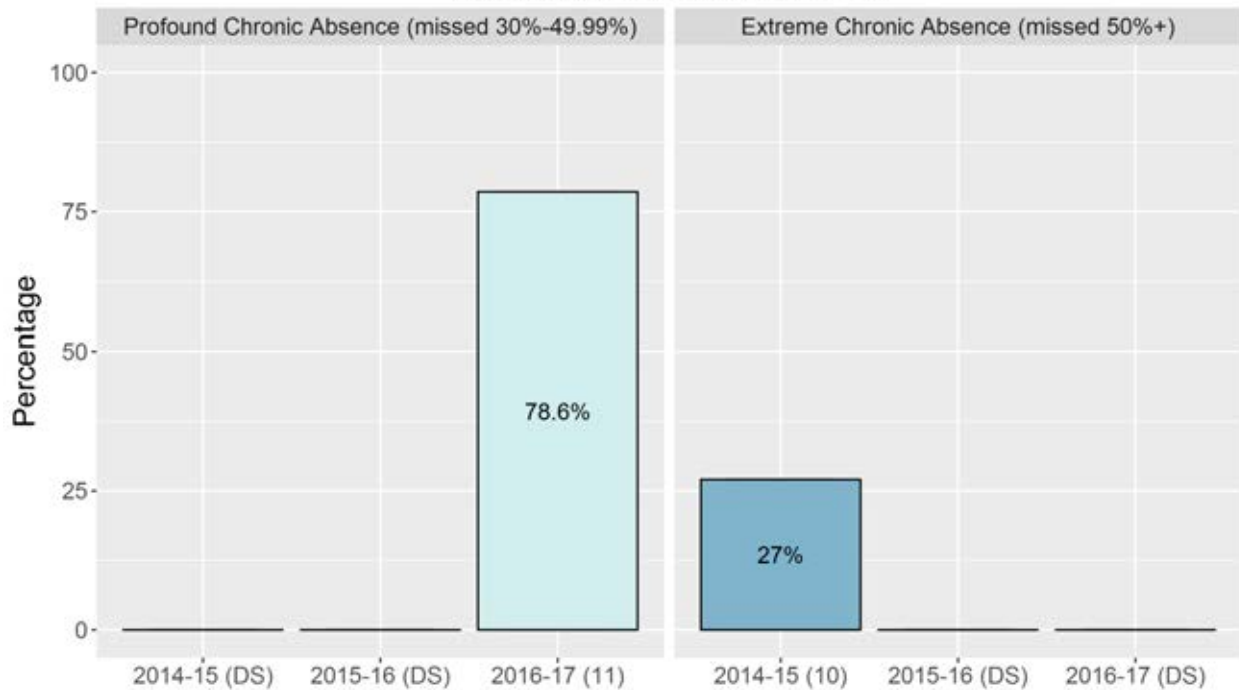
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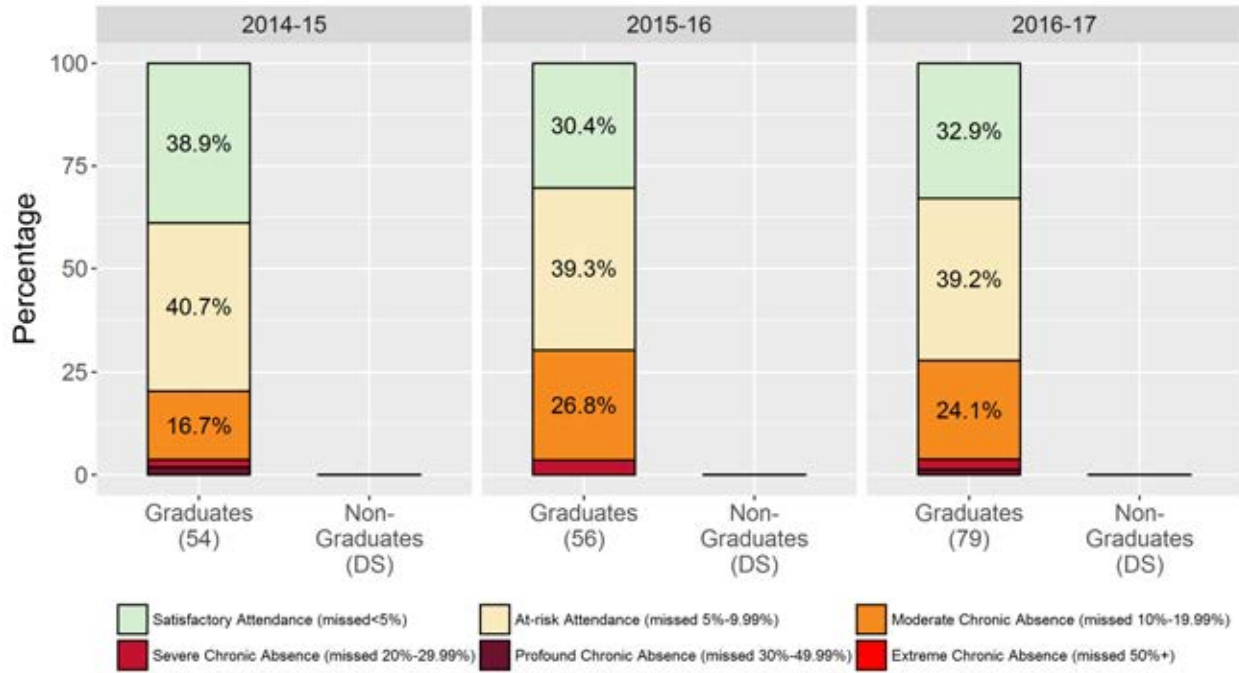
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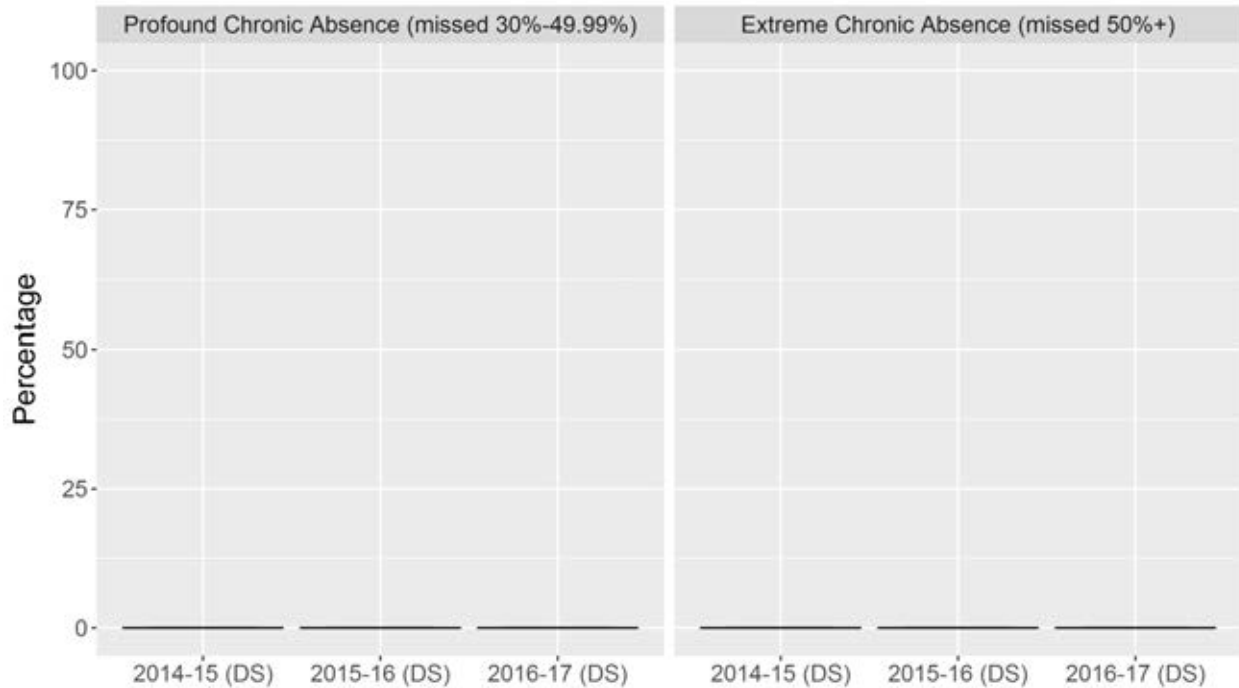
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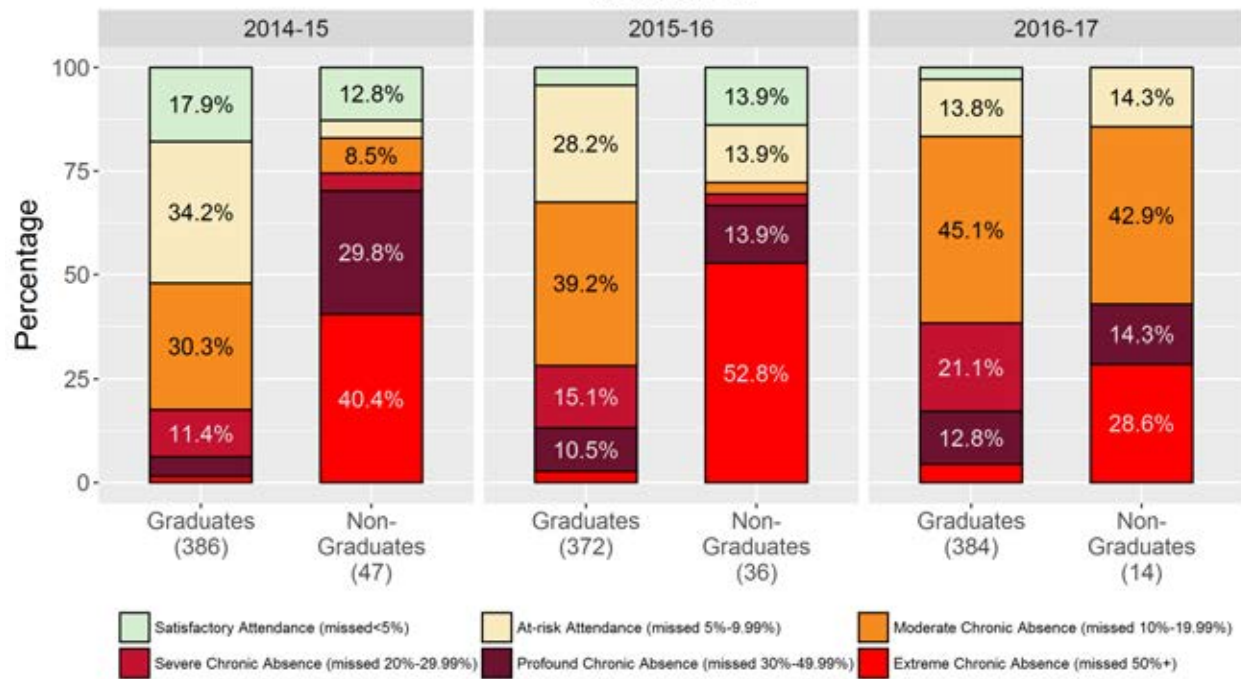
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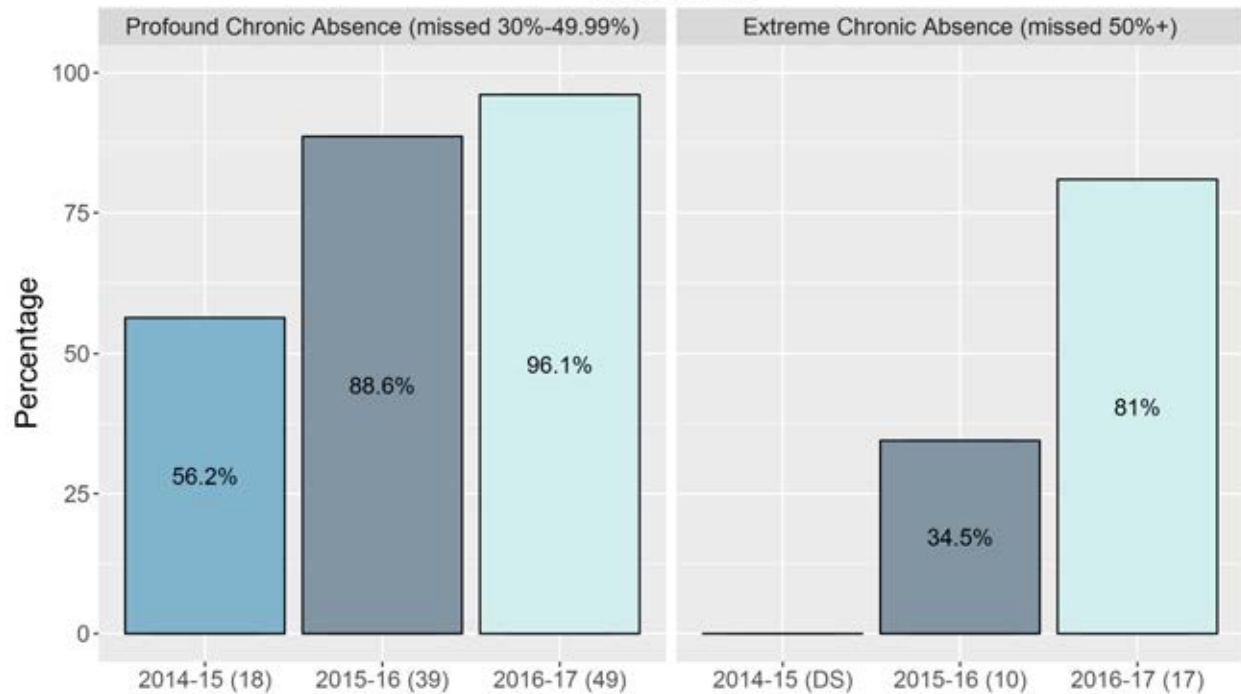
Washington Latin PCS Upper School



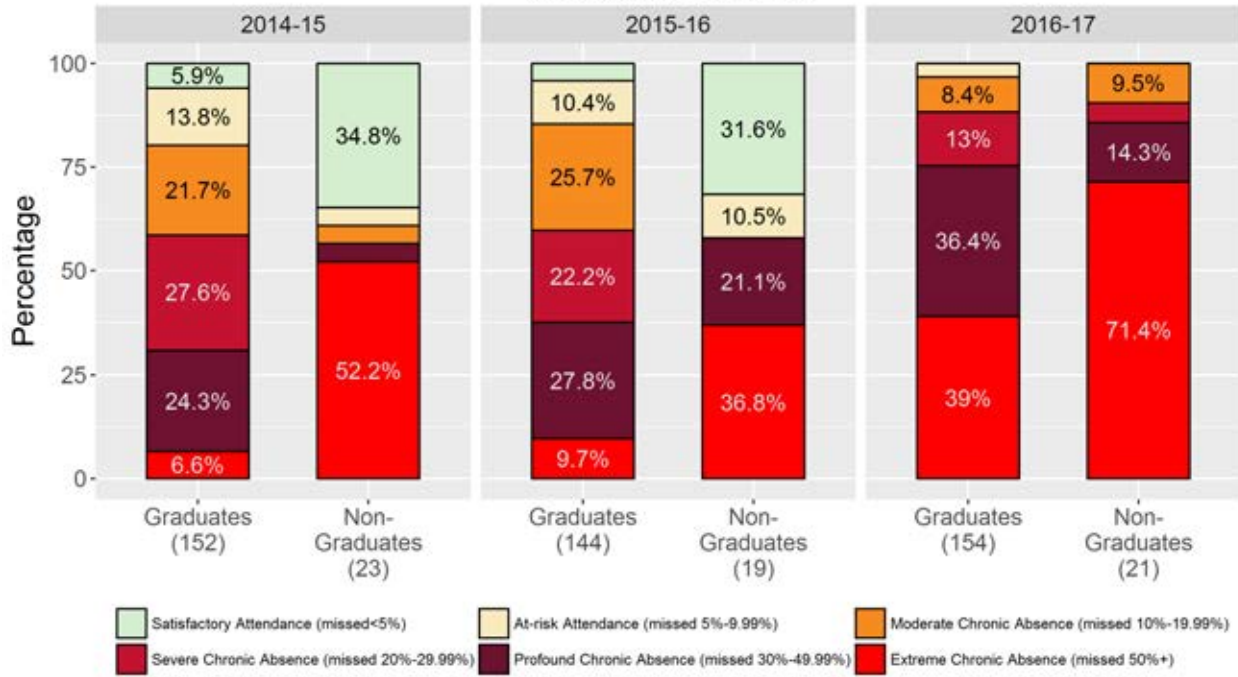
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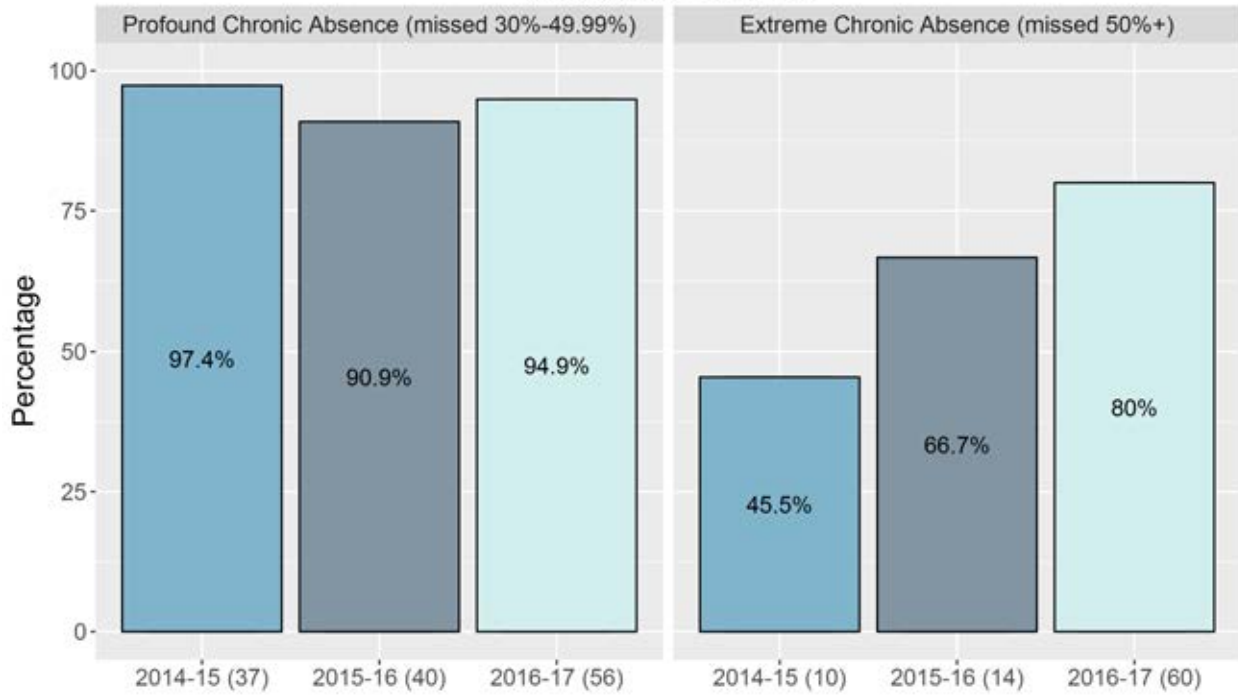
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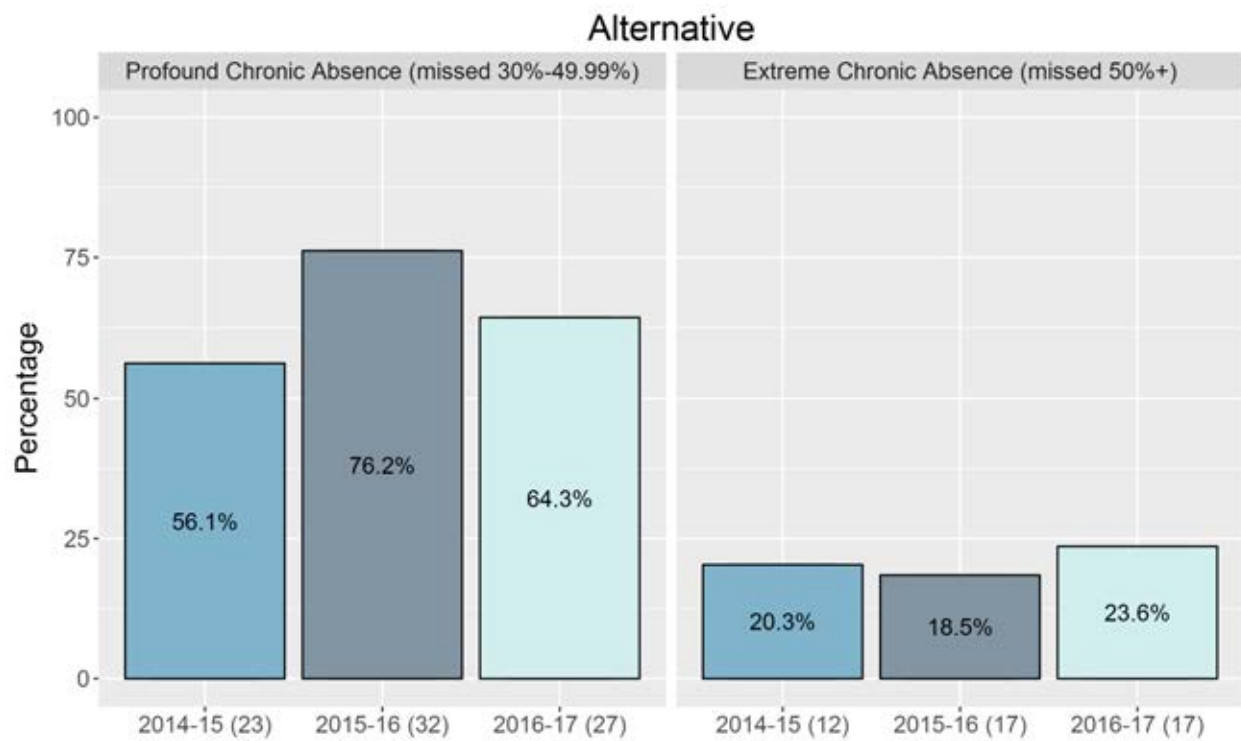
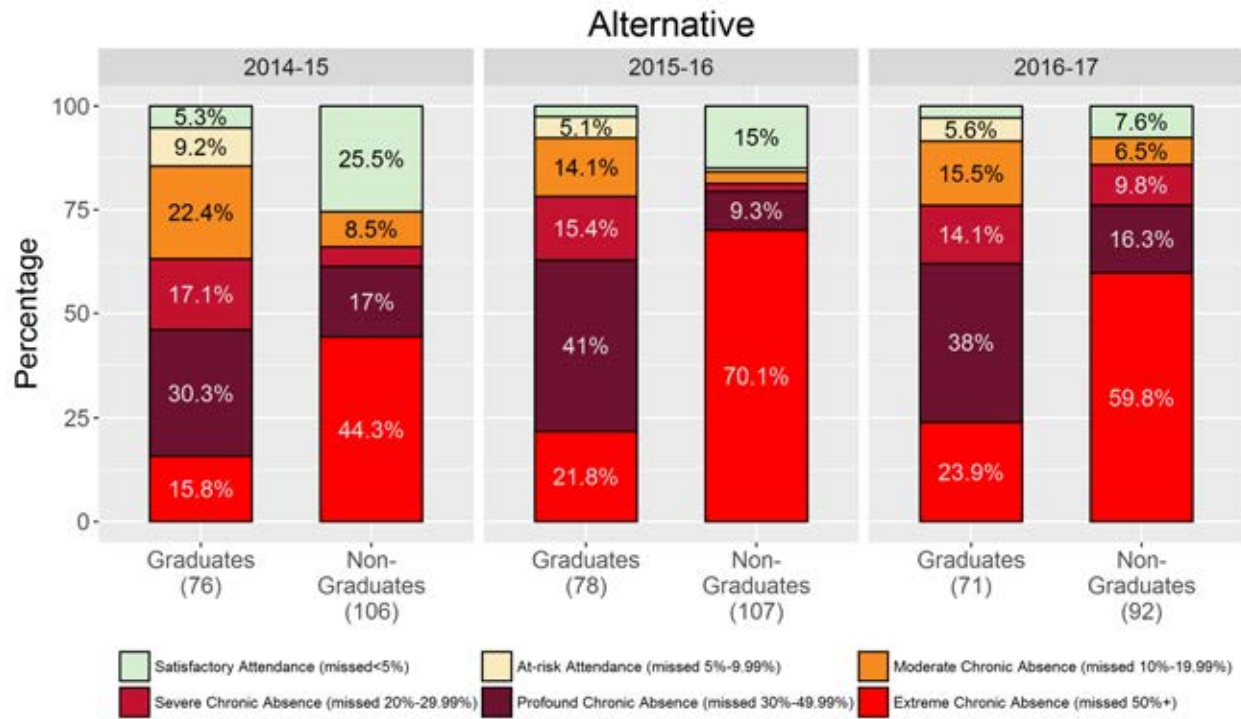
Woodson H D HS



Woodson H D HS



Appendix C: Additional Figures
 Figure C.1 Alternative Schools





District of Columbia
Office of the State Superintendent of Education

Review of District of Columbia Public Charter School Board Graduation Policies and Procedures: School Year 2016-17

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Introduction

On December 1, 2017, Mayor Muriel Bowser directed the Office of the State Superintendent of Education (OSSE) to conduct an analysis of student-level attendance and graduation outcomes at public high schools in the District of Columbia.¹ Under this directive, OSSE has undertaken the following actions: to review District of Columbia Public Schools (DCPS) graduation policies and practices, including a school-specific investigation of Ballou Senior High School (Ballou SHS); to conduct a citywide analysis of student attendance and graduation outcomes for all District of Columbia (DC) high schools; and to review DC Public Charter School Board (PCSB) oversight of charter school graduation and policies. This report contains findings and recommendations related OSSE's review of PCSB's oversight of charter high schools during the 2016-17 school year, including a review of PCSB's policies and practices for certifying charter schools students for graduation.

Background

OSSE is responsible, with the advice and approval of the DC State Board of Education, for establishing the minimum requirements to graduate from a DC public high school with a diploma (see Appendix A).² PCSB, as DC's sole charter authorizer, is responsible for ensuring that charter schools comply with applicable laws and the provisions of each school's charter,³ and it has established policies and procedures to do so. Per the Mayoral order OSSE initiated an investigation to determine if PCSB appropriately implemented these requirements with regard to school year 2016-17 graduates.

Investigation Process

OSSE's investigation included reviewing the following:

Publicly available documents and recordings

1. School Reform Act, D.C. Official Code § 1800, et. seq., specifically authority of chartering body, contents of petition, etc.
2. 5-A DCMR Chapter 21 (Graduation)
3. PCSB High School Graduation Requirements Approval Process (adoption/effective date: Sept. 30, 2011; most recently updated: June 20, 2016)
4. PCSB High School Graduation Requirements Approval Process (Sept. 30, 2011)
5. PCSB Attendance and Truancy Policy (adoption/effective date: Aug. 18, 2008; most recently updated: Dec. 19, 2016)
6. PCSB Transcript Audits Policy (most recently updated: Oct. 26, 2015)
7. Select PCSB Board meeting minutes related to the adoption of relevant policies
8. Select charter agreements and charter school websites

¹ Mayor's Memorandum 2017-3, dated December 1, 2017.

² OSSE, pursuant to Sections 3(b)(7) of the State Education Office Establishment Act of 2000 (D.C. Official Code § 38-2602(b)(7) (2012 Repl. & 2015 Supp.)), is responsible for establishing the minimum credits that must be achieved in order to graduate, with the advice and approval of the SBOE, pursuant to Section 403(a)(3) of PERAA (D.C. Official Code §§ 38-2652(a)(3) (2012 Repl. & 2015 Supp.)).

³ D.C. Official Code § 38-1802.11(a)(1).

9. Video recording of D.C. Council Roundtable on Graduation Rate Accountability (Dec. 15, 2017)

Documents submitted by PCSB

1. DC PCSB Transcript Audits Policy
2. List of DC PCSB and Consultants who Completed Transcript Audits in SY 16-17
3. DC PCSB SY 16-17 Certified Grad List by School
4. 16-17 Transcript Audit Training Materials
 - a. 12th Grade Transcript Audit Timeline SY 2016-2017
 - b. 12th Grade Transcript Audits: What to Expect During the Process (optional training for charter high schools)
 - c. 12th Grade Transcript Audits Training for School Year 2016-17: DC PCSB Staff and Consultants
5. Communications to Schools During Audit Cycle (samples)
6. Post-Audit Executive Summaries
7. Post-Audit School Validated Grad Lists
 - a. Cover emails for individual schools provided with master spreadsheet for all schools

OSSE's investigation also included interviewing the following individuals:

1. PCSB staff person who leads the 12th grade transcript audit process for all DC charter high schools
2. PCSB senior management

Review of Policy Implementation

PCSB High School Graduation Requirements Approval Process Policy - Overview

According to PCSB's High School Graduation Requirements Approval Process Policy (see Appendix B), which was most recently updated on June 20, 2016 to account for a new opportunity to seek waivers in order to offer competency based courses, PCSB considers graduation requirements "an inherent part of the education program [PCSB] approves when it approves a high school charter application." Under this policy, PCSB approves "applications for public charter high schools that contained graduation requirements equivalent to or surpassing" the statewide requirements in local regulation. To "ensure a public charter high school is held accountable to the graduation requirements approved in its application, [PCSB] will include those graduation requirements in its charter agreement."

In addition, a charter high school has "school-specific graduation requirements that are equivalent to or surpassing those outlined in [state regulation] and the school grants students waivers from a school-specific graduation requirement, then the criteria to receive a waiver must be included in the school's graduation requirements in Schedule K of its charter agreement."

The previous version of this policy, dated September 30, 2011, stated that charter school graduation requirements must "match or exceed those for District of Columbia Public Schools (DCPS) high school students." (see Appendix C) The DCPS requirements at the time were included in the document.

As PCSB requires all high school diplomas issue by PCSB-authorized charter schools to be signed by the PCSB Chair or Vice Chair, all high schools are required to submit final individual student transcripts signed by each school's registrar and diplomas for signature at least two weeks before graduation.

Results of Review

PCSB's 2018 Charter Application Guidelines for Submitting an Application to Establish a Public Charter School in the District of Columbia directs applicants to the DC high school graduation requirements and requires all charter applicants seeking to offer high school grades to "specify which courses are required for graduation, the number of credits for each course, and the minimum grade/score that students must earn to earn credits." Applicants to open high schools must also provide:

- What procedures will the school institute to ensure students progress adequately and appropriately toward graduation, and what supports will the school have in place to support students who are not on track to graduate when they arrive? Include how students with disabilities, English learners, and "at-risk" populations are kept on track to graduate.
- List the school's graduation requirements, including required courses, credits, minimum passing grades, etc.

In order for the LEA to receive approval, required curriculum samples must include "all courses necessary to prepare students to meet the school's mission and goals, including all necessary credits for high school graduation, if applicable, and any mission-specific courses; and demonstrate that the applicant has the capability to design or select a comprehensive, high quality curriculum before its first academic year of operation."

PCSB policy requires graduation requirements to be included in charter applications, which are incorporated by reference into the binding charter agreements that authorize the operations of each charter school. In interviews with PCSB representatives, OSSE was informed that PCSB works to ensure that LEA graduation requirements are aligned to state regulations through requiring LEAs to submit a “Schedule K” in accordance with the policy.

However, it was generally difficult and in one instance not possible to find charter graduation requirements by examining these documents as currently posted on the PCSB website. Upon being notified of the difficulties of locating this information, PCSB committed to updating its website to make graduation requirements more easily accessible to the public.

In some instances it was also difficult or not possible for OSSE to find this information on individual LEA websites. For instance, at least one charter high school does not post student or parent handbooks and requires a password to access anything beyond very general information or federally required statements. PCSB has indicated that it will follow up to ensure greater access to this information at the LEA level.

PCSB Transcript Audits Policy – Overview

According to PCSB’s Transcript Audits Policy (see Appendix D), PCSB staff and consultants audit 12th grade transcripts each year between March and May.⁴ The purpose of the audit is to ensure the students are on track to be included on a certified graduates list. Confirmation of student records through the audit process is also required in order for a student’s diploma to be signed by the PCSB chair. The policy, which primarily describes the mechanics of the annual process, requires schools to “verify the roster of seniors presently enrolled, their school-specific graduation requirements, and their grading policies and procedures” prior to the start of the audit.

Under the policy, the auditors review all 12th grade transcripts “to ensure the accuracy, completeness, and integrity of student academic records. Reviewers work with school staff to analyze report cards, official transcripts, student/parent handbooks, course catalogues and guidance/registrar files to complete the review. Schools are asked to provide the following documents to the PCSB staff and consultant review team:

- A copy of each senior’s memorandum of understanding⁵
- Photocopies of senior transcripts for purposes of mark-up
- Documentation of all completed community service hours
- Documentation of night school or any other form of credit recovery course completion [.]”

Auditors compare each student’s cumulative academic record to his or her transcript and the schools’ graduation requirements to determine the student’s graduation status. The results of the reviews are

⁴ The Transcript Audits Policy also explains the process for a 9th grade transcript audit process that is not the subject of this review.

⁵ A memorandum or letter of understanding is a document used to communicate to students and families where each student stands in relation to graduation requirements. As a part of the transcript review process, PCSB auditors look for copies of these documents to be signed by a school official and the student and/or parent.

recorded in pre-formatted spreadsheets. After the review is complete PCSB sends an “Executive Summary” of the findings to the school, including the number of students found to be on track to graduate.

After the review, and prior to each high school’s scheduled graduation ceremony, schools must schedule post-audit appointments with PCSB staff, during which the school is required to provide documented evidence for any students whose graduation status changed from “not on track” to “on track” or vice versa since the time of the transcript audit, and original copies of high school diplomas for each of their anticipated June graduates.

After June graduation ceremonies are held, PCSB establishes a deadline by which high schools must submit a list of all students who graduated in June and a list of students “who are expected to graduate after summer school or another credit recovery program.” Summer graduates are required to be submitted to PCSB by August 31 in order for PCSB to submit a combined list of certified graduates to OSSE each year to be used for official reporting.⁶

Results of Review

Through interviews and a review of submitted documents, OSSE concludes that PCSB substantially implemented the 12th Grade Transcript Audits Policy for the 2016-17 school year.

There are currently 21 public charter high schools operated by 19 local education agencies (LEAs) that award high school diplomas or certificates of completion.⁷ During the 2016-17 school year, 18 of those high schools awarded diplomas or certificates of completion to students. The remaining three schools were not included in the audit because they did not have a 12th grade during the 2016-17 school year.⁸

Although the current Transcript Audit Policy does not indicate when the policy was first adopted or became effective, staff report that PCSB has been conducting audits of 12th grade transcripts since at least 2011. Staff reports that, for the purpose of the 12th grade audit, the student records of students with disabilities who will be receiving certificates of completion are also audited, including requesting and reviewing signed copies of the student’s IEP to ensure that parents know that students are on a certificate track.

Training of Auditors and Schools

Although PCSB staff reported that the majority of auditors are experienced and are former school or PCSB staff, the auditor training materials provided to OSSE are brief and do not contain the level of specificity expected based on the complexity of the review process as described by PCSB.

Charter high schools are not required to attend mandatory training regarding the 12th grade audit review process. PCSB offers an optional training but the presentation materials contained very high-level information. PCSB staff reported, however, that for high schools who request extra help, PCSB staff will

⁶ A summary table of PCSB-certified school year 2016-17 graduates, by school, is included in Appendix E.

⁷ A certificate of completion may be awarded to a student with a disability based on the decision of the student’s individual educational program (IEP) team. A certificate of completion is not a diploma.

⁸ District of Columbia International School PCS, Sustainable Futures PCS, and Washington Leadership Academy PCS.

go on-site to the school to provide targeted technical assistance in addition to the training offered to all schools. PCSB staff also reports that, for schools experiencing staff turnover or in instances where audit review teams flag issues regarding record keeping or other related concerns, PCSB will proactively contact schools to arrange for additional on-site support.

Timeline of 2016-17 Review

Based on a review of the documentation provided and interviews with PCSB staff, the spring 2017 transcript audit process was conducted on the following timeline:

- **February 22, 2017:** Charter high schools were contacted to begin scheduling on-site reviews for the month of April.
- **March 13, 2017:** PCSB held an optional training for charter high schools to provide an overview of the 12th grade transcript audit process.
- **April 5, 2017 – May 1, 2017:** Audits were conducted by review teams that varied in size from 1 to 11 based on the number of files to be reviewed. Review teams members included 13 PCSB staff and 4 consultants.⁹
- **May 2017:** PCSB provided high schools with an Executive Summary of their findings from the audit, a copy of the spreadsheet auditors used to complete the transcript audit, and information regarding the school’s post-audit diploma validation appointment.
- **By August 30, 2017:** PCSB provided each charter high school with a final certified graduates list and copy of the transcript audit spreadsheet.

Documentation Reviewed by Auditors

PCSB staff who have been part of review teams report that auditor review teams review report cards, official transcripts, community service hour documentation, memoranda of understanding that explain to students and families the graduation status of students, school course catalogs, and other school-specific record keeping. Auditors review underlying documentation, such as report cards and community service hour logs, to compare course grades and hour totals listed on each student’s current 12th grade transcript. Auditors also cross-check records with each high school’s course catalog and other school-specific information.

Although LEAs are not required to use memoranda (also called letters of understanding) with students and families, their use is strongly recommended by PCSB and failure to use or maintain such documents was noted in at least 3 executive summaries provided to schools at the completion of the process.

Audit Results

The end result of the spring audit is a determination by the audit team as to whether a student is “on track” or “off track” for graduation. These determinations are provided back to the LEA through an Executive Summary and a spreadsheet with an individual student-level accounting of credits earned, potential credits to be earned based on course enrollments, community service hours earned, and any other LEA-specific requirements. The Executive Summary provides a brief description of the records

⁹ PCSB staff described all consultants used in the 2016-17 review as experienced reviewers.

reviewed by the auditors (standard paragraph used for nearly all LEAs); a summary of the number of 12th grade student files reviewed and an accounting of whether each student was “on track for graduation,” “not on track for graduation (due to service hours only),” “not on track for graduation (due to insufficient credits),” or fell into another category based on a LEA-specific scenario; a high level overview of how the individual high school’s graduation requirements differ from the state minimum requirements (if applicable); and a series of recommendations that, for the majority of schools, provides a general summary of what evidence the school must produce during a post-audit diploma validation appointment to verify service learning hours and credits and, for schools with record-keeping challenges, makes specific recommendations.

The Transcript Audits Policy does not define “on track” or “off track.” The training materials for auditors states that a student is “on track” for community services hours “if he or she has completed at least 80% of the total number of service hours that are required by the school.” However, neither the auditor training materials nor the optional LEA training materials define “on track” in terms of student credit accrual – and the optional LEA training materials mention but do not explain the difference between students who are “on track” to graduate in June versus on track to graduate in August.

Based on a review of individual Executive Summaries and interviews with PCSB staff, it appears that the following definitions are used by reviewers:

- **On Track for Graduation:** As explained during staff interviews, a student is considered to be “on track” in terms of credit accrual if the student has passed his or her “core courses” and is enrolled in the proper courses to graduate.
 - o Student grades in enrolled courses do not appear to be taken into consideration.
 - o Students are generally only identified as “on track” to graduate in August if an individual school provides additional information. PCSB staff reported that most high schools conduct a “mini audit” before the auditors arrive and may have notes to provide to the auditors.
- **Not on Track for Graduation (Due to service hours only):** A student is considered to be “off track” for graduation in this category if he or she is on track to earn all required credits but has not yet completed at least 80% of the total number of community service hours that are required by the school.
- **Not on Track for Graduation (Due to insufficient credits):** A student is considered to be “off track” for graduation in this category if he or she is unable to meet the required graduation credit requirements by June or August. Students in this category may also be “off-track” with regards to community service hours.
- Examples of Other Categories:
 - o **Not on Track (Due to a specific LEA requirement)**
 - o **Files Not Checked (Due to unknown reason)**
 - o **Files Not Checked (Due to missing records)**
 - o **Files Not Checked (Due to nonpublic placement)**
 - o **Files Not Checked (Due to special circumstances)**
 - o **Files Not Reviewed (Due to an auditor’s loss of data)**

In some instances records reflect that schools request, and the auditors review, records for if 11th grade “potential graduates.” It is not clear from provided material the circumstances under which such requests can be made or accommodated.

Figure A. Summary of On Track and Off Track Results

| High School | Transcript Audit Date | 12 th Grade Enrollment on Audit Date | On Track for Graduation | Not On Track for Graduation (Due to Community Service Hours Only) | On Track for Graduation (Insufficient Credits) | Not on Track for Graduation (Insufficient Credits) | Files Checked or Not on Track for Graduation for Other Reasons |
|---|-----------------------|---|-------------------------|---|--|--|--|
| BASIS DC PCS | 4/6/2017 | 16 | 16 | | 0 | | |
| Capital City PCS High School | 4/7/2017 | 64 | 57 | N<5 | N<5 | | |
| Cesar Chavez PCS - Capitol Hill | 4/28/2017 | 65 | 46 | 6 | 13 | | |
| Cesar Chavez PCS - Parkside HS | 5/1/2017 | 66 | 37 | 22 | 6 | N<5 | |
| E.L. Haynes PCS High School | 4/13/2017 | 100 | 82 | 17 | N<5 | | |
| Friendship PCS - Collegiate Academy | 4/19/2017 | 200 | 154 | 21 | 23 | N<5 | |
| Friendship PCS - Technology Preparatory Academy | 4/12/2017 | 44 | 18 | 24 | N<5 | | |
| IDEA PCS | 4/14/2017 | 45 | 35 | 6 | N<5 | N<5 | |
| Kingsman PCS | 4/11/2017 | 46 | 5 | 17 | 13 | 11 | |
| KIPP DC PCS College Prep Academy | 4/26/2017 | 80 | 76 | 3 | N<5 | | |
| Maya Angelou PCS | 4/10/2017 | 45 | 17 | 19 | 9 | | |
| National Collegiate PCHS | 4/27/2017 | 56 | 44 | 10 | N<5 | | |
| Paul PCS | 4/24/2017 | 87 | 34 | 33 | 6 | 14 | |
| Richard Wright PCS | 4/20/2017 | 49 | 47 | 0 | N<5 | | |
| SEED DC PCS | 4/10/2017 | 21 | 17 | N<5 | N<5 | | |
| Thurgood Marshall Academy PCS | 4/5/2017 | 69 | 43 | 22 | N<5 | | |
| Washington Latin PCS | 4/17/2017 | 91 | 73 | 12 | N<5 | N<5 | |

| | | | | | | |
|--|-----------|----|----|-----|---|--|
| Washington Mathematics Science and Technology PCS | 4/25/2017 | 64 | 58 | N<5 | 5 | |
|--|-----------|----|----|-----|---|--|

Area of Focus: Attendance

In general, school districts and high schools may account for attendance through school or LEA-wide grading systems that require individual course grades to be lowered or course failures for specific numbers of absences, through individual grading practices that incorporate class participation, or by giving school leaders or teachers the ability to take attendance into account on a case by case basis. PCSB requires applicants seeking to open charter high school to describe “student retention policies, including any retention requirements related to student absences or repeated tardiness.”

During the 2016-17 school year and in prior years, PCSB did not review student attendance during the 12th grade transcript audit process in order to determine whether LEAs were following their own policies with regard to courses required for graduation.

In public testimony and in interviews with OSSE, PCSB has committed to including attendance in the 12th grade transcript audit review process for school year 2017-18 for charter LEAs that currently have schools polices that include attendance as a component of passing a class or earning a credit in a course. PCSB reports that 8 charter LEAs have policies impacted by this decision and that all impacted schools have been contacted regarding the additional documentation they will be required to provide this year. Of the 8 charter LEAs, PCSB reports that 3 of the LEAs have school policies that refer to attendance in the criteria for passing a course but provide for school leader discretion and flexibility.

Area of Focus: Credit Recovery

“Credit recovery” is a term used generally to describe school-based courses or programs that provide students an opportunity to retake previously failed courses, often on an accelerated schedule. There is no standard federal or local definition of the term and LEAs establish their own policies and procedures related to any such offerings including, but not limited to, eligibility for participation, how students are referred or assigned to credit recovery, where and when credit recovery courses take place, how credit recovery course enrollments are recorded, how credit recovery credits are earned and recorded, and if/how credit recovery credits appear differently on transcripts and report cards.

During the 2016-17 school year and in prior years, PCSB did not explicitly review credit recovery during the 12th grade transcript audit process in order to determine whether LEAs were following their own policies with regards to awarding credit for courses required for graduation. Although PCSB staff reports that the individual auditors do look for evidence of prior course failures when examining credits awarded through credit recovery opportunities, it is not a required component of the audit and is not addressed in the PCSB policy or any of the audit materials provided to OSSE.

Findings & Recommendations

Overall, the strength of the transcript audit process as described by staff appears to be more robust than what is described in the policy itself and, at times, what is reflected in the underlying documentation. For example:

- Although the tracking spreadsheets used by the auditors do not include credit distribution sub-requirements – such as the requirement that 3 of the 4 required science credits must be lab sciences and 1 of the 3 lab sciences must be Biology – staff reports that the auditors do check for these underlying requirements.
- Although LEA-specific credit recovery requirements are not formally reviewed, PCSB staff reports that auditors do look for original course failures on the underlying report cards.

PCSB is strongly urged to consider updating the Transcript Audits Policy and all related supporting materials, including training materials, to fully document and formalize existing practices.

OSSE makes the following additional recommendations:

1. Require all LEAs to publicly post all graduation requirements online in a location that does not require a password to access.
2. Consider requesting and reviewing memoranda of understanding at the beginning of the school year to ensure that students and families are receiving the information they need in enough time to address any deficiencies that exist.
3. Annually collect and review LEA policies that include attendance as a component of grading and/or promotion policies. Ensure LEA compliance with these policies through the 12th grade transcript audit process.
4. Require all LEAs to develop written credit recovery policies that address eligibility for participation, how students are referred or assigned to credit recovery, where and when credit recovery courses take place, how credit recovery course enrollments are recorded, how credit recovery credits are earned and recorded, and if/how credit recovery credits appear differently on transcripts and report cards. Ensure LEA compliance with these policies through the 12th grade transcript audit process.
5. Create a file review tool for each LEA that allows auditors to crosswalk all specific graduation requirements with each student's file. This tool is especially important given the level of review needed by each auditor (i.e., auditors must do course by course and year by year reviews for each child).

Appendix A: District of Columbia Graduation Requirements

TITLE 5-A DISTRICT OF COLUMBIA MUNICIPAL REGULATIONS CHAPTER 22

2203 ACADEMIC REQUIREMENTS

2203.1 The course work set forth in Subsections 2203.3 shall be required of students who enrolled in ninth (9th) grade in school year 2007-2008 and thereafter in order to be certified as eligible to receive a high school diploma.

2203.2 At the beginning of the ninth (9th) grade, students shall develop a graduation plan pacing the courses they will take to complete high school. This shall be done with the assistance of the school counselor or other school official designated by the local education agency (LEA).

2203.3 (a) A total of twenty-four (24) Carnegie Units in corresponding subjects and required volunteer community service hours shall have been satisfactorily completed for graduation.

(b) The following Carnegie Units in the following subjects shall be required:

| COURSES | UNIT(S) |
|---|---------|
| English | 4.0 |
| Mathematics; must include Algebra 1, Geometry, and Algebra II at a minimum | 4.0 |
| Science; must include three (3) lab sciences | 4.0 |
| Social Studies; must include World History 1 and 2, United States History; United States Government, and District of Columbia History | 4.0 |
| World Language | 2.0 |
| Art | 0.5 |
| Music | 0.5 |
| Physical Education/Health | 1.5 |
| Electives | 3.5 |
| Total | 24.0 |

(c) At least two (2) of the twenty four (24) Carnegie Units for graduation must include a College Level or Career Preparatory (CLCP) course approved by the LEA and successfully completed by the student. The course may fulfill subject matter or elective unit requirements as deemed appropriate by the LEA. CLCP courses approved by the LEA may include courses at other institutions.

- (d) All students must enroll in Algebra I no later than tenth (10th) grade commencing with the 2016-2017 school year, unless the school is approved for a waiver pursuant to Subsection 2203.7.
- (e) For all students entering the ninth (9th) grade beginning school year 2009-2010, one (1) of the three (3) lab science units, required by paragraph (a) of this subsection, shall be a course in Biology.
- (f) In addition to the twenty-four (24) Carnegie Units, one hundred (100) hours of volunteer community service shall be satisfactorily completed. The specific volunteer community service projects shall be established by the LEA.
- (g) One and one half (1.5) Carnegie Units in health and physical education shall not be required for the evening program high school diploma.

2203.4 An LEA may establish specialized or career-focused programs or courses of study, which lead to the high school diploma in accordance with Subsection 2203.3. These courses of study can include academic, performing arts, science and mathematics, and career or vocational education focuses or other areas of concentration. The programs or courses of study may require additional coursework.

2203.5 Electives taken to fulfill the requirements of Subsection 2203.4 shall be required to be taken in courses established by the LEA for each area of concentration in order to receive certification in the area of concentration.

2203.6 Each student who completes the requirements for specialized or career focused courses of study established under Subsection 2203.4 shall receive appropriate recognition on the student's diploma.

2203.7 Beginning with School Year 2016-2017:

- (a) The District of Columbia Public Schools (“DCPS”) or the Public Charter School Board (“PCSB”) may waive the Carnegie Unit requirement set forth in Subsection 2203.3 for a school seeking to award competency-based unit(s), as defined in this chapter, accordingly:
 - (1) A school that seeks a waiver from the Carnegie Unit requirement to award competency-based unit(s) shall submit an application to either the DCPS or PCSB. If a charter school is part of an LEA, the application must be submitted to the PCSB through the LEA;

- (2) Applications for a waiver to award competency-based unit(s) shall be in the format established by the Office of the State Superintendent of Education (“OSSE”) and contain the information required by OSSE; and
- (3) The DCPS or PCSB, respectively, shall review the school’s application in accordance with the standards and requirements established by OSSE. If the school’s application meets the standards and requirements established by OSSE, the DCPS or PCSB, respectively shall approve the school’s application for a waiver to award competency-based unit(s);

(b) [RESERVED]

(c) OSSE shall make publicly available aggregated evidence of annual implementation of Subsections 2203.7(a) in a summative report no later than three years after initial implementation, and annually thereafter, to share best practices and lessons learned from implementation.

2203.8 A student with special needs who does not achieve a diploma, as set forth in Subsection 2203.3 shall be eligible to receive an Individual Educational Program (IEP) Certificate of Completion. The decision to pursue a program leading to an IEP Certificate of Completion shall be made by the IEP team including the parent(s) and where possible, the student. The decision shall be made no earlier than the ninth (9th) grade and shall be attached in writing to the student’s IEP. An LEA shall comply with the requirements of the Individuals with Disabilities Education Act of 2004 (20 U.S.C. §§ 1400 *et seq.*) (IDEA) and District law with regard to appropriate transition assessments.

2203.9 Graduation Requirements for Previous Years: The following coursework shall be required of students who enrolled in ninth (9th) grade for the first time in 1982-1983 or a prior school year in order to be certified as eligible to receive a high school diploma:

- (a) A total of seventeen and a half (17.5) Carnegie Units;
- (b) The Carnegie Units shall include:
 - (1) Four (4) Units in English;
 - (2) One (1) in United States History;
 - (3) One half (0.5) Unit in United States Government;
 - (4) One (1) Unit in Mathematics;
 - (5) One (1) Unit in Science;
 - (6) One and one half (1.5) Units in Health/Physical Education; and
 - (7) Eight and one half (8.5) electives; and
- (c) One and one half (1.5) Carnegie Units in health and physical education shall not be required for the evening program high school diploma.

2203.10 The following coursework shall be required of students entering ninth (9th) grade for the first time in any of the school years between and including school year 1983-1984 and school year 1992-1993 in order to be certified as eligible to receive a high school diploma.

- (a) A total of twenty and a half (20.5) Carnegie Units;
- (b) The Carnegie Units shall include:
 - (1) Four (4) in English;
 - (2) One (1) in Foreign Language;
 - (3) One half (0.5) in D.C. History-Government;
 - (4) One (1) in U.S. History;
 - (5) One half (0.5) in U.S. Government;
 - (6) Two (2) in Mathematics;
 - (7) Two (2) in Science;
 - (8) One and one half (1.5) in Health/Physical Education;
 - (9) One (1) in Life Skills Seminar and seven (7) Electives; and
- (c) One and one half (1.5) Carnegie Units in health and physical education shall not be required for the evening program high school diploma.

2203.11 The following coursework shall be required of students entering ninth (9th) grade for the first time in any of the school years between and including 1993-1994 and school year 2006-2007 in order to be certified as eligible to receive a high school diploma:

- (a) A total of twenty-three and a half (23.5) Carnegie Units shall have been completed.
- (b) The following Carnegie Units in the corresponding subjects shall be required:

| COURSES | UNITS |
|--|--------------|
| Art | 0.5 |
| Career/Vocational Education | 1.0 |
| Electives | 4.5 |
| English | 4.0 |
| Foreign Languages | 2.0 |
| Health & Physical Education | 1.5 |
| Mathematics (including elementary Algebra or its equivalent) | 3.0 |
| Music | 0.5 |
| Science (including one (1) year of lab science) | 3.0 |

| | |
|---|------|
| Social Studies to include D.C. History, World Geography and U.S. Government (each 0.5), U.S. History and World History (each 1) | 3.5 |
| Total | 23.5 |

- (c) One and one half (1.5) Carnegie Units in health and physical education shall not be required for the evening program high school diploma; and
- (d) One hundred (100) hours of community service shall be required for graduation.

SOURCE: Final Rulemaking published at 63 DCR 5221 (April 8, 2016).

2299 DEFINITIONS

2299.1 When used in this chapter, the following terms shall have the ascribed meanings:

“Carnegie Unit” - one hundred and twenty (120) hours of classroom instruction over the course of an academic year.

“Competency-based Unit” - a unit equivalent to a Carnegie Unit that is earned toward graduation for successful completion of an approved competency-based learning course or course series per Subsection 2203.7.

“Local Education Agency” - pursuant to Section 9101 of the No Child Left Behind Act of 2001, approved January 8, 2002 (115 Stat. 1956; 20 U.S.C. § 7801(26)(A)), a public board of education or other public authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or of or for a combination of school districts or counties that is recognized in a state as an administrative agency for its public elementary schools or secondary schools.

“Office of the State Superintendent of Education” or “OSSE” - the District of Columbia state level education agency established by Section 302(a) of the Public Education Reform Amendment Act of 2007, effective June 12, 2007 (D.C. Law 17-9; D.C. Official Code § 38-2601 (2012 Repl.)).

“School” - means a school within the District of Columbia Public School system or a public charter school in the District of Columbia.

SOURCE: Final Rulemaking published at 63 DCR 5221 (April 8, 2016).

Appendix B: Current PCSB High School Graduation Requirements
Approval Process Policy



| | |
|---|--------------------------------------|
| POLICY TITLE: | |
| High School Graduation Requirements Approval Process Policy | |
| ADOPTION/EFFECTIVE DATE: September 30, 2011 | MOST RECENTLY UPDATED: June 20, 2016 |
| | |

POLICY

Once a charter is fully approved by DC PCSB, a public charter school has exclusive control over its instructional methods. However, as agreed to in a school’s charter agreement, changes to a school’s curriculum that impact its mission require a charter agreement amendment. For high schools, graduation requirements are an inherent part of the education program DC PCSB approves when it approves a high school charter application. The School Reform Act states that public charter schools must graduate students who are (1) nationally and internationally competitive; (2) educated individuals in the 21st century; and (3) perform competitively on districtwide assessments. To that end, DC PCSB will approve applications for public charter high schools that contain graduation requirements equivalent to or surpassing¹ those outlined in the DC Municipal Regulations (“DCMR”) Title V, Chapter 22 ([read here](#)). To ensure a public charter high school is held accountable to the graduation requirements approved in its application, DC PCSB will include those graduation requirements in its charter agreement.

If a school has school-specific graduation requirements that are equivalent to or surpassing those outlined in the DCMR and the school grants students waivers from a school-specific graduation requirement, then the criteria to receive a waiver must be included in the school’s graduation requirements in Schedule K of its charter agreement. High school graduation requirements must include all the course requirements and additional activities (e.g., community service and portfolios) required for graduation. If a school offers competency-based learning, then the school must obtain the appropriate waivers from DC PCSB pursuant to the process developed by the Office of the State Superintendent of Education, per the [High School Credit Flexibility](#) regulations as approved by the State Board of Education (SBOE). Any school with graduation requirements that are equivalent to or surpassing those outlined in the DCMR that grant students waivers or that are approved to offer competency-based learning must work with DC PCSB staff to amend its charter agreement to include Schedule K by January 31, 2017.

¹ Surpassing DCMR graduation requirements means exceeding the number of credits or requirements needed to graduate as outlined in the DCMR.

All high school diplomas issued by public charter schools authorized by DC PCSB must be signed by the DC PCSB Chair or Vice Chair. Accordingly, all high school diplomas, along with a final transcript signed by the School Registrar for each student receiving a diploma, must be sent to DC PCSB's offices for signature at least two weeks before graduation.

Board Approval Acknowledged By:



Darren Woodruff
DC PCSB Board Chair

Appendix C: Former PCSB High School Graduation Requirements Approval Process



HIGH SCHOOL GRADUATION REQUIREMENTS APPROVAL PROCESS

PCSB UNIT OF RESPONSIBILITY: School Performance Team

REFERENCE

| | |
|-----|-----|
| N/A | N/A |
|-----|-----|

PROCEDURE

Requirements for graduation must match or exceed those for District of Columbia Public Schools (DCPS) high school students (see below). By *July 15th* of each school year in which seniors will graduate, each high school must forward to the Board their requirements for graduation. Requirements will be reviewed at the November Board meeting and schools will be notified promptly of the D.C. Public Charter School Board’s (PCSB) decision.

All diplomas issued by charter schools under the PCSB must be signed by the PCSB Chair. Please send diplomas to the PCSB office for signature no later than two weeks before graduation.

2203 GRADUATION: ACADEMIC REQUIREMENTS

2203.1 The following course work shall be required in order to be certified as eligible to receive the high school diploma:

- (a) A total of twenty-four (24) Carnegie units shall have been satisfactorily completed;
- (b) The following Carnegie units in the corresponding subjects shall be required:

| <u>Subject</u> | <u>Units</u> |
|--|--------------|
| Art | 0.5 |
| Career/Vocational Education | 2 |
| Electives | 1.5 |
| English | 4 |
| Foreign Languages | 2 |
| Health & Physical Education | 1.5 |
| Mathematics (Including Elementary Algebra or its equivalent) | 4 |
| Music | 0.5 |
| Science (including one year of lab science) | 4 |
| Social Studies | 4 |

- (c) One and one-half (1 ½) Carnegie units in health and physical education shall not be required for the evening program high school diploma; and
- (d) One hundred (100) hours of community service shall be required for

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Section: HIGH SCHOOL GRADUATION REQUIREMENTS APPROVAL PROCESS - Last updated: September 30, 2011

5.2



HIGH SCHOOL GRADUATION REQUIREMENTS APPROVAL PROCESS

graduation.

- 2203.2 The requirements for completing the volunteer community service unit shall be established by the Superintendent.

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Section: HIGH SCHOOL GRADUATION REQUIREMENTS APPROVAL PROCESS - Last updated: September 30, 2011

5.2

Appendix D: PCSB Transcript Audit Policy



| | |
|---------------------------------|--|
| POLICY TITLE: Transcript Audits | |
| ADOPTION/EFFECTIVE DATE: N/A | MOST RECENTLY UPDATED: October 26, 2015 |
| | |

PURPOSE

The DC Public Charter School Transcript Audit Policy applies to all authorized public charter high schools in the DC Public Charter School Board (“PCSB”) portfolio. This policy explains the process by which PCSB verifies the status of 9th grade students, to ensure they are on track to graduate in four years (one of the indicators measured in the Performance Management Framework) as well as the graduate status of 12th grade students to ensure they are on track to be included on the certified graduates list.

POLICY

Ninth Grade Transcript Audit

PCSB staff conducts 9th grade transcript audits on all schools eligible for the High School PMF. These audits usually take place in June and July with a follow-up in August after summer school has ended. This process provides data for the 9th grade on-track measure in the High School PMF. In this process, a pre-formatted Excel spreadsheet with the 9th grade student names listed in PCSB's database is sent to schools. Schools are asked to indicate whether each student is "on-track" or "not on-track" to graduate in four years, based on credits earned by the end of the student's 9th grade year. That completed spreadsheet is returned to PCSB. Then PCSB staff conducts the audit at the school, reviewing a random selection of 20% of 9th grade students. This process is done with school staff and includes a review of the school's promotion policy, credits earned, course grades earned, and community service completed. If all of the student records in the random selection are correct (i.e., the on-track status is the same as what the school listed on the original spreadsheet), then the audit is considered complete. However, if any of the audited students cannot be verified (i.e., the on-track status does not match what is listed on the spreadsheet), all 9th grade students will be audited. A summary of the findings is sent to the school after the audit. At the end of the summer, the on-track numbers are revised to include students whose on-track status changed after completing summer school.

Twelfth Grade Transcript Audit

PCSB staff and consultants conduct 12th grade transcript audits on all schools that serve 12th grade students. These audits are conducted between March and May. For a charter school student to receive a high school diploma signed by the PCSB chair, that student's academic records must be confirmed through the audit process. Prior to the audit, schools verify the roster of seniors

presently enrolled, their school-specific graduation requirements, and their grading policies and procedures. In the audit process, all seniors' transcripts are reviewed to ensure the accuracy, completeness, and integrity of student academic records. Reviewers work with school staff to analyze report cards, official transcripts, student/parent handbooks, course catalogues and guidance/registrar files to complete the review. Discussion with school leaders occurs as needed. At the end of the process, the audit review team conducts a clarifying session which provides an opportunity for the school to review the data and clarify any miscalculations.

Schools are asked to provide the following documents to the PCSB staff and consultant review team:

- A copy of each senior's memorandum of understanding
- Photocopies of senior transcripts for purposes of mark-up
- Documentation of all completed community service hours
- Documentation of night school or any other form of credit recovery course completion

The review team uses pre-formatted Excel spreadsheets to document each student's graduation status by comparing his or her cumulative academic record to the official transcript and the school's graduation requirements. An Executive Summary of the findings is then sent to the school and includes the number of students on target to graduate.

Prior to each charter high school's graduation ceremony, each school must schedule an appointment with PCSB staff in order to complete a post-audit follow-up session. During the post-audit appointment, two things occur: (1) the school provides documentation to PCSB staff as evidence for any students whose graduation status changed from "not on track" to "on track" or vice versa since the time of the transcript audit; and (2) the school provides original copies of high school diplomas for each of their anticipated June graduates. Once PCSB staff validates every student's record and determines eligibility for graduation, the school's diplomas are accepted to be signed by PCSB's board chair.

Following all high school graduations, PCSB designates a due date for all schools to submit a certified graduates list of all students who graduated, as well as a list of students who are expected to graduate after summer school or another credit recovery program. At the end of the summer, the graduation numbers are revised to include students who graduated after completing summer school with a final cutoff date of August 31 for all summer school graduates. PCSB compiles the June certified graduates list and the summer school graduates list to create one certified list of graduates for the school year that is sent to the Office of the State Superintendent of Education to calculate each school's adjusted cohort graduation rate.

Board Approval Acknowledged By:



Darren Woodruff
DC PCSB Board Chair

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Appendix E: Count of Final School Year 2016-17 PCSB-Certified Diploma and Certificate Recipients

| Charter High School | Diplomas | Certificates | Total |
|---|-----------------|---------------------|--------------|
| BASIS DC PCS | 16 | | 16 |
| Capital City PCS-High School | 63 | | 63 |
| Cesar Chavez PCS-Capitol Hill | 66 | | 66 |
| Cesar Chavez PCS-Parkside HS | 62 | | 62 |
| E.L. Haynes PCS - Kansas Avenue High School | 97 | 1 | 98 |
| Friendship PCS - Collegiate Academy | 183 | 2 | 185 |
| Friendship PCS - Technology Preparatory Academy | 43 | | 43 |
| Goodwill Excel Center PCS | 15 | | 15 |
| IDEA PCS | 37 | | 37 |
| Kingsman Academy PCS | 32 | 3 | 35 |
| KIPP DC - College Prep PCS | 80 | | 80 |
| Maya Angelou PCS-Evans High School | 55 | | 55 |
| National Collegiate Preparatory PCHS | 51 | | 51 |
| Paul PCS-International High School | 84 | | 84 |
| Richard Wright PCS for Journalism and Media Arts | 49 | | 49 |
| SEED PCS of Washington, DC | 22 | | 22 |
| St. Coletta Special Education PCS | | 17 | 17 |
| Thurgood Marshall Academy PCS | 63 | | 63 |
| Washington Latin PCS-Upper School | 88 | | 88 |
| Washington Mathematics Science Technology PCHS | 60 | | 60 |



District of Columbia
Office of the State Superintendent of Education

Interim Report

District of Columbia Public Schools

Audit and Investigation – Ballou

High School



DCPS GRADUATION REVIEW
SY 2016-2017 AUDIT AND INVESTIGATION



**Interim Report
District of Columbia Public Schools
Audit and Investigation – Ballou High School**

January 12, 2018

Contract Number # CW57247

CONTAINS SENSITIVE INFORMATION

Submitted To:

Office of the State Superintendent of Education
810 First Street, NE, 9th Floor
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Submitted By:

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I. INTRODUCTION

In late November 2017, a series of stories were released in local media outlets alleging that *Ballou High School* (“Ballou”) in Southeast Washington, DC had improperly graduated many students. Specific allegations made in the coverage included that teachers had been pressured to award higher grades to students, that credit recovery was being improperly used, and that graduates had passed courses despite extreme levels of absenteeism.

Alvarez & Marsal (“A&M”) was engaged by the Office of the State Superintendent of Education (“OSSE”) to conduct an audit and investigation to examine policy adherence and supporting grade and graduation data in *District of Columbia Public Schools* (“DCPS”) High Schools, with a specific focus on Ballou. The scope of work includes a review of the records for the entire class of 2017 at Ballou as well as representative samples of students of the other 18 DCPS high schools that submitted graduation data to OSSE in school year 2016-2017 (“SY16-17”). A&M’s investigation included on site interviews with relevant teachers and administrators. The 45-day investigation will produce an Interim Report detailing findings specific to Ballou as well as a Final Report that provides findings for all DCPS high schools as well as analysis of centrally administrated systems, policies, and procedures.

A. Allegations

Initial media coverage and A&M’s subsequent interviews with current and former Ballou staff identified key allegations regarding potential policy violations at Ballou. Reports included claims that Ballou Students were graduating despite being unprepared, with some students so far below standards that they are unable to read or write. Reports made specific allegations which centered around students who had not met standards in compliance with DCPS and *District of Columbia Municipal Regulations* (“DCMR”) requirements. Specific allegations included:

- Students passed courses with excessive unexcused absences in violation of DCPS policy.
- Administrators applied pressure to pass chronically-absent students and to give them make-up work or extra credit which did not align with the provisions of the *SY 2015-2016 DCPS Secondary School Grading and Reporting Policy* (“Grading Policy”).
- Ballou had an unofficial policy under which it granted students 50 percent credit on assignments that they missed or did not complete.
- The school engaged in inappropriate or excessive use of credit recovery, including allowing students who had not yet failed courses to take credit recovery for original credit.
- Teachers received poor evaluations, which resulted in or could result in job dismissal, for failing to implement the administration’s practices.

B. A&M's Role

OSSE retained A&M to conduct an independent investigation and audit of the compliance of individual DCPS schools with DCPS and statewide attendance and graduation policies. Areas of focus included evaluating compliance with attendance-related grading policies, credit recovery policies, and fulfillment of the requirements for graduation. A&M also assessed whether any relevant parties exercised an undue influence on the behavior of teachers or administrators at Ballou as well as the other DCPS High Schools.

A&M's investigation included reviewing policies and procedures, conducting interviews with key staff, analyzing data and reviewing student records for SY16-17 to present a report detailing the extent of policy and regulation violations, and their potential contribution to graduation. During the course of the investigation, A&M has also documented other findings and observations related to grading, attendance, and credit recovery.

This Interim Report reflects A&M's preliminary findings at Ballou only. A&M's Final Report will reflect a broader analysis and investigation of High Schools DCPS-wide, and will be delivered on January 26, 2018.

C. Key Findings

This final summary demonstrates that a total of 113 students benefited from a total of 222 policy violations, and summarizes A&M's key finding that **the total number of students who graduated with the assistance of these policy violations was 113 out of 177 (63.8%).**

| Consolidated Findings | Count of Students | % of Graduates |
|--|-------------------|----------------|
| Total number of graduates | 177 | |
| Missing Required Coursework | 3 | 1.7% |
| Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation | 76 | 42.9% |
| Passed Despite Excessive Absences in Evening Credit Recovery Courses | 49 | 27.7% |
| Passed Despite Excessive Absences in Daytime Credit Recovery Courses | 17 | 9.6% |
| Credit Recovery Earned as an Original Credit | 48 | 27.1% |
| Credit Recovery Earned Taken Concurrently with Original Credit Course | 24 | 13.6% |
| Total Graduations Due to Policy Violations | 113 | 63.8% |
| Total Graduations without Policy Violations | 64 | 36.2% |

Figure 1: Consolidated Findings

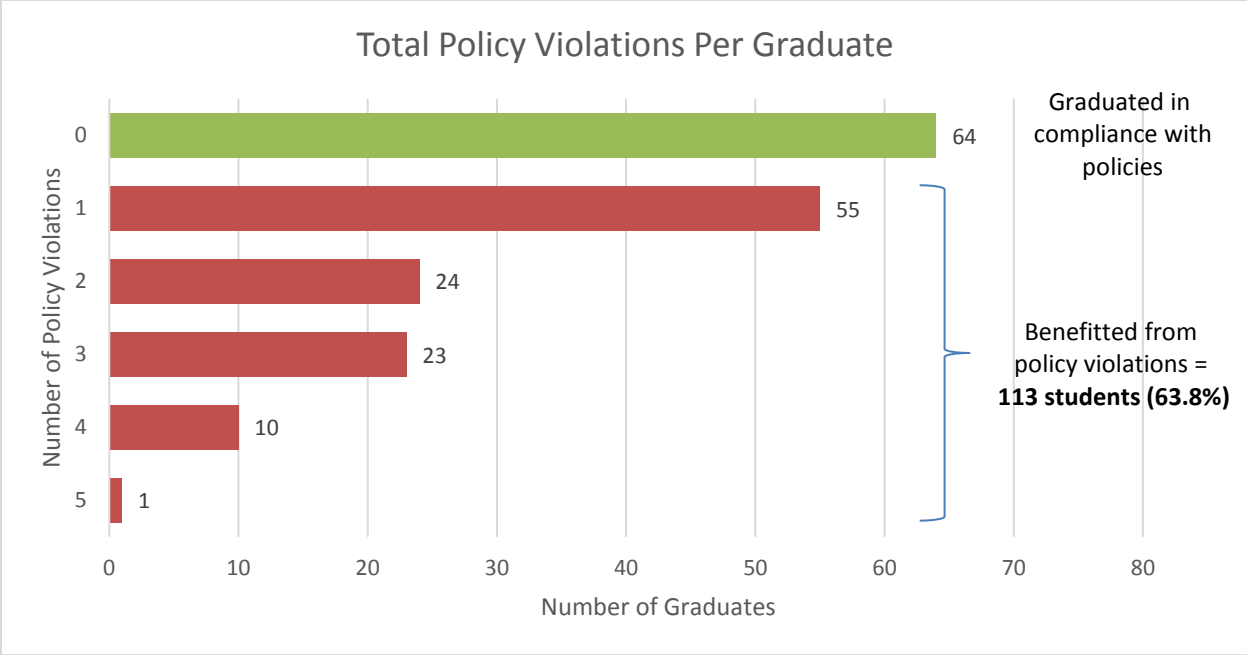


Figure 2: Total Policy Violations Per Graduate

| Key Finding | Description |
|--|--|
| Transcripts of SY16-17 graduates missing courses required to graduate | A&M conducted a review of each SY16-17 Ballou graduate’s final transcript and identified three students that were missing at least one core class required to earn a DC Diploma. |
| Students passed courses with excessive unexcused absences in violation of DCPS policy | Ballou is non-compliant with the Grading Policy, particularly the attendance-related grading policy. Many teachers did not apply the grade reductions required for excessive absences – sometimes unaware of the policy, and in other instances, due to the understanding that they had complete autonomy over grading. Through a review of course attendance and associated grades for SY16-17, A&M identified that 76 of Ballou’s 177 graduates passed required courses despite having more than 30 absences. 54 total unique graduates received credit for daytime and evening credit recovery courses despite failing to meet attendance requirements. In total, 113 unique students received credit for graduation-required courses despite absences in excess of requirements. |
| Ballou Teachers were pressured to provide opportunities to pass | Ballou administrators communicated high passing percentage expectations to teachers. These expectations were communicated directly to teachers from the Principal and Assistant Principals in person, via staff meetings, and via email, and were formalized in the Ballou IMPACT rubric. Teachers were encouraged to offer |

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| | |
|--|---|
| students with excessive absences | makeup work and extra credit to students regardless of excessive absences. Many teachers expressed that not following these practices would negatively impact their evaluations. |
| Ballou had an unofficial policy under which it granted students 50 percent credit on assignments that they missed or did not complete | Ballou administrators provided guidance throughout the SY16-17 which directly contradicted the Grading Policy. Teachers were instructed via email and in-person communications that the lowest grade possible at Ballou is a 50, and, separately, that students with missing assignments should be marked with an (M) and graded as a 50. A grading floor of 50 does not align with DCPS. Some Ballou teachers perceived the floor of 50 percent for missed assignments to be a mandate while others, though encouraged to do so, believed that the floor of 50 was at the option of the teacher. |
| Ballou engaged in inappropriate or excessive use of credit recovery | Of 177 seniors in SY16-17, 124 participated in some form of credit recovery during their high school career and 83 participated in some form of credit recovery during the SY16-17. During SY16-17, 48 students received credit for credit recovery courses despite never having taken the original course. Additionally, 24 students received credit for credit recovery courses taken concurrently with the original credit course. |

II. POLICIES AND PROCEDURES REVIEW

A&M conducted a review of relevant policies and procedures and practices at DCPS to understand requirements and assess their application across DCPS’s 19 high schools that reported graduation rates in the SY16-17. This Interim Report includes a brief overview of policies and procedures applicable to the allegations at Ballou. A&M’s Final Report will include a comprehensive review of policies and procedures, and their application across DCPS.

A. Grading Policy

DCPS introduced a formal written Grading Policy for the SY15-16. The Grading Policy communicates relevant requirements from DCMR in a format that is more accessible to teachers and administrators and provides additional guidance on other DCPS grading-related policies. A&M reviewed this Grading Policy to support on-site investigations, data analysis, and the development of this report. An important procedural change that occurred in this same timeframe was the migration to the *Aspen Student Information System* (“Aspen”) electronic grading system and gradebook at the start of SY16-17. The grading policies relevant to our findings at Ballou are summarized below.

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1. Grading

Multiple aspects of DCMR and the Grading Policy are most relevant to examining grading practices at Ballou:

- **Responsibility for grading (5-E DCMR § 2200.4 and Grading Policy):** “The primary responsibility for evaluating the work of the student shall rest with the teacher. All students shall receive instruction leading to the achievement of the District of Columbia Public Schools (DCPS) content standards.”
- **Opportunity to earn passing grades after progress reports (Grading Policy):** “All students should be given the opportunity to earn a passing grade after progress reports are issued, even if they are failing when they receive their progress report. This should not be construed to mean students should receive unearned passing grades.”
- **Grading Scale (5-E DCMR § 2200.7 and Grading Policy):** Establishes the grading scale for letter grades for advisory (quarter) grades as well as final grades. Of note for this report, the grading scale does not specify minimum scores for student grades, regardless of whether students failed to complete assignments or had excessive absences.

2. Absences and Grading

DCMR and the Grading Policy specify sanctions regarding excessive absences, while affirming student responsibility and rights to complete make-up work in cases of excused and unexcused absences.

- **Grade Reductions resulting from student absences (5-E DCMR § 2103.7-2103.9 & Grading Policy):**
 - “Secondary students with five (5) or more unexcused absences in any class during a single advisory shall receive a grade reduction in that subject.”
 - “Secondary students with ten (10) or more unexcused absences in any class during a single advisory shall receive a grade of “FA” (failure due to absences) in that subject.”
 - “Secondary students accumulating thirty (30) or more unexcused absences in a course within a full school year shall receive a failing final grade in that course with a resulting loss of course credit.”
- **Make-up work provided in cases of excused and unexcused absences (Grading Policy):** “If a student has an excused absence, including absence due to suspension, it is their responsibility to follow the guidelines provided by the teacher in his/her classroom syllabus regarding the make-up work or the school building’s make-up work policy. Students are responsible for the work missed even if the absence is unexcused.”

B. Credit Recovery

Multiple forms for credit recovery exist within DCPS. However, DCMR and the Grading Policy contain limited references to credit recovery. Most of the guidelines surrounding credit recovery for SY16-17 are provided in the *DCPS Evening Credit Recovery Operations Manual* ("ECR Manual"). The only authorized forms of credit recovery according to the Grading Policy and the revisions of the ECR Manual (both in SY16-17 and SY17-18) are Evening Credit Recovery ("ECR") and Twilight. Other forms of credit recovery are not explicitly addressed.

1. Qualifications to Participate

The ECR Manual outlines the requirements for participation:

- "The student has previously taken and failed the course."
- "The course fulfills a graduation requirement the student needs to meet."
- "The student is not currently taking the course during his/her daytime schedule."

Additionally, the ECR Manual states that a student may be approved to take an original credit course in ECR, provided that: "(1) the course is needed to fulfill graduation requirements and (2) the student will be potentially eligible for graduation by June or August 2017." Such approvals are required to be made by the DCPS Academic Planning and Support Team.

2. Grading

The Grading Policy and DCMR outline rules on the marks to be awarded for retaken courses:

- "Marks (grades) in courses failed and retaken for credit in grades kindergarten through 12 shall not replace previously earned marks (grades) for any given course, but are included in the student's cumulative grade point average (GPA)."
- "Marks (grades) earned in extended education programs such as Summer School, STAY School and ECR courses have the same credit and GPA value as standard year courses."

3. Attendance

The ECR Manual specifies attendance requirements for ECR courses which are stricter than those for standard courses:

- "Students may accrue no more than three (3) unexcused absences during an ECR course in order to remain eligible to receive credit."
- "Students may accrue no more than nine (9) unexcused tardies during an ECR course in order to remain eligible to receive credit (i.e., three (3) unexcused tardies = one (1) unexcused absence)."

C. Graduation Requirements

5-A DCMR § 2203.3 (B) and the Grading Policy each specify graduation requirements for students. The current set of requirements was instituted for courses beginning in SY07-08.

1. Required Courses

Credits awarded are based on the Carnegie Unit in DCPS, which specifies 120 hours of teaching time for each unit of credit awarded. The definition of a Carnegie Unit is outlined in 5-A § DCMR 2299.1 to mean “one hundred and twenty (120) hours of classroom instruction over the course of an academic year.”

2. Total Credits

5-A DCMR § 2203.3 (A) requires 24 Carnegie Units to be completed by a student for graduation, with course-specific requirements for Carnegie Unit completion outlined in 5-A DCMR § 2203.3 (B) and in the Grading Policy.

3. Community Service Hours

5-A DCMR § 2203.3 (F) requires that “one hundred (100) hours of volunteer community service shall be satisfactorily completed. The specific volunteer community service projects shall be established by the LEA.” The DCPS Student Guide to Community Service (published in August 2015) state that students are required to “volunteer at a 501(c)(3) organization or a federal, state or local government agency.”

III. INVESTIGATION

To assess the validity of the various allegations related to Ballou, A&M conducted an investigation which included data analysis, document review, on-site interviews, and interviews with DCPS leadership personnel and subject matter experts (“SMEs”). This Interim Report includes only findings relevant to the allegations against Ballou High School. Broader, DCPS-wide findings identified through the course of this investigation will be presented upon delivery of A&M’s Final Report.

In addition to the Ballou staff interviews outlined in the On-Site Investigations Approach, A&M interviewed the following DC Officials, DCPS Leadership, and Central Office Staff:

- Deputy Mayor for Education
- Chancellor of DCPS
- Chief of Secondary Schools
- Deputy Chief of Compliance and Policy
- Chief of Talent and Culture
- Deputy Chief of IMPACT
- Members of the Academic Planning & Support team
- Instructional Superintendent for Cluster 8
- Deputy Chancellor Social Emotional Academic Development
- Deputy Chief Information Officer

A. Data Collection and Analysis

1. Approach

a) Develop Understanding of Data Systems

Aspen, DCPS’s student information system, is the primary electronic data source for this investigation. DCPS uses the third-party software to record attendance, grades, assignments, report cards and other information about students.

To develop an understanding of Aspen and other data systems in use at DCPS, A&M conducted interviews with *DCPS’s Deputy Chief Information Officer (“DCIO”)* and members of the Office of Enterprise Applications and Data Systems. Additionally, A&M interviewed teachers and designated SMEs on Aspen at Ballou to confirm our understanding of the system’s application. A&M also reviewed DCPS’s Aspen data dictionary, frequently asked questions, and systems manuals for Aspen.

(1) Data Collection

On December 12, 2017, A&M received data from DCPS in the form of an SQL Server database backup reflecting all Aspen data tables. The database received contained grading and attendance data for all DCPS high schools.

(2) Students Included in this Investigation

To establish the population of SY16-17 graduates which is the basis of this investigation, A&M utilized the Actual Graduates Report for SY16-17 Ballou graduates and 2017 Ballou summer school graduates with adjustments identified to exclude students identified by the DCPS Academic Planning and Support team and confirmed by Ballou. This list of **177 graduates includes all SY16-17 graduates** - those included in the four-year graduating cohort (i.e. used to calculate the adjusted cohort graduation rate published reported by OSSE) as well as students graduating in three years and over five or more years.

2. Data Analysis

A&M performed data analysis both to identify the number of instances of policy violations where applicable, and to support our on-site interviews and records review. This analysis included a review of the following:

- Attendance records, for both excused and unexcused absences - Attendance was analyzed at the course level, rather than at the day level. Attendance analysis was combined with data on grading to assess compliance with the excessive unexcused absence requirements of the Grading Policy.
- Grade and transcript data - Advisory (quarterly) grade data (also referred to as term data), final grade report information, and transcript data were analyzed to assess compliance with credit recovery policies which require students to take and fail an original credit course before taking credit recovery.

B. On-Site Investigations

1. Approach

The Statement of Work (“SOW”) required A&M to conduct on-site school investigations. The purpose of these on-site visits is two-fold: 1) to understand how Ballou is implementing the policies and procedures related to grading and recordkeeping that are outlined in DCPS policies and procedures and District of Columbia laws and regulations and 2) to review student records for 2017 graduates so that specific attributes could be tested.

A&M interviewed a number of Ballou administrators and support staff who had direct responsibility for 12th graders during SY16-17:

- Principal
- Assistant Principal
- Attendance Counselor

- Guidance Counselor
- Pathways Coordinator
- Credit Recovery Coordinator
- Registrar

Of the approximately 50 Ballou teachers that taught seniors in SY16-17, only 28 are still employed by the school - A&M interviewed 17 of these teachers. In addition, A&M attempted to contact seven former teachers and interviewed three of them as of the date of this Interim Report.

To accurately investigate the allegations against Ballou, A&M reviewed records for all 177 SY16-17 Ballou graduates, rather than taking a sample. To test student attributes, A&M collected and reviewed the following records for all students in the graduating class of 2017:

- Student cumulative folders
- Copies of final transcripts
- Copies of final report cards
- Community service verification forms
- Grade change forms

In addition to a record of the grades students earned for courses they took throughout high school, the transcript also includes the *Letter of Understanding* (“LOU”), which is an electronically-generated checklist of courses taken against graduation requirements. The LOU lists out each course required for graduation, the number of credits the student has received in that course, and the percentage completion for each requirement. A student whose LOU reports ‘100% Completed’ for each graduation requirement is eligible to graduate. The LOU serves as an automated method for certifying students for graduation.

a) Student Data and Record Review

A&M completed attribute testing for each student at Ballou to assess the school’s compliance with the grading and credit recovery policies. A&M summarized the results at the student ID level, with the number of students included for each test.

A&M manually reviewed student transcripts to determine whether the automated transcript certification process accurately included only students who met the graduation requirements. Additionally, A&M examined the LOU to ensure that all graduation requirements on the LOU that were marked “100% Completed”, had corresponding passing grades on the student’s final transcript. A&M also checked the transcripts against the final report cards to verify that each credit and grade on the final report card was consistent with what was reflected on the transcript.

Additionally, A&M reviewed community service verification forms for a sample of students to validate that students completed at least 100 hours at an appropriate organization, and that forms were signed by the appropriate supervisor. A&M conducted data analysis to verify that the hours on the transcript were consistent with what was reflected on the Actual Graduates Report and that the automated

certification process accurately consolidated the information. A&M checked the hours on the community service forms against the hours reflected on the transcript to verify that the two sources matched.

Finally, A&M reviewed student cumulative files to ensure that any grade change forms were fully documented with the appropriate teacher and principal signatures. A&M also ensured that any grade changes were initiated by the appropriate personnel and included both a teacher and principal response. To ensure compliance with the DCPS grade change policy, A&M checked the rationale for grade changes and supporting documentation. If the grade was changed due to the completion of credit recovery, A&M indicated which form of credit recovery the student completed.

IV. FINDINGS

A&M's key findings for Ballou High School are presented below. A&M has provided an analysis of overall participation in credit recovery and attendance issues to provide context for findings, and has analyzed adherence to Grading Policy, credit recovery eligibility, and attendance requirements. Where applicable, A&M identified the number of students who were aided to graduation by policy violations. The analysis presented here reflects an interim presentation of findings for Ballou only, additional analysis will be included in A&M's Final Report.

The section below combines each of these analyses on a per-student basis to identify the total number of students whose graduation benefited from these policy violations. Additional considerations related to these issues are discussed in the Other Findings and Recommendations section.

A. Graduates Missing Required Coursework

A&M's student data and record review included a thorough evaluation of each 2017 Ballou graduate's final transcript to verify that students had met all graduation requirements¹. A&M identified that **of 177 graduates, three students were missing credits in core classes required to earn a DC Diploma**. Although manual transcript review could have identified the missing credits, IT system challenges contributed to these students receiving diplomas despite missing courses. In one case, a student was awarded credit on their final transcript for a core course despite a final mark on the transcript of 'F' and in all three cases, the automated LOU indicated that the student was eligible to graduate.

B. Excessive Absences and Grading Policy Adherence

Throughout the course of this investigation the A&M team noted the unique challenges present within Ballou High School's student population. Ballou students face many challenges in maintaining regular attendance not faced by most high school students, including high rates of poverty, homelessness, work and childcare responsibilities, interaction with the court system, and many others. A&M recognizes these challenges do contribute to absenteeism at Ballou, however this analysis cannot, and does not, attempt to account for these challenges. As such, A&M analyzed Ballou High School's compliance with standards and requirements for DCPS as a whole.

Seniors in-particular miss a large number of classes, which can make it extremely difficult to master core subject matter, complete graduation requirements, and build the skills needed to be prepared for college or to start a career. Analysis and reporting on absences in DCPS often focus on day-level metrics that rely on the calculation of "present" as defined by 5-A DCMR § 2199 which considers a student absent if he or she misses 20 percent of the day. Due to block scheduling at Ballou High School, the so-called "80/20"

¹ Graduation Requirements evaluated in accordance with (DCMR) Title 5 (Education), Chapter 22

rule identifies students as absent after missing just one class, and can lead to exaggerated interpretations of absence issues. For this reason, A&M’s attendance analysis reflects the entry that each teacher made for the appropriate class period.

A&M’s investigation found that Ballou High School is non-compliant with Grading Policy, particularly pertaining to the impact of excessive absences on student grading. Many teachers did not apply the grade reductions required for excessive absences. In order to test for compliance with this policy, A&M analyzed final grade data for every 2017 Ballou High School graduate, and compared it to course-specific attendance data. Figure 3 below summarizes the attendance of each student in each individual course. Of a total of 973 (full and partial-year) regular instruction courses which resulted in credit, 169 courses were passed by students who had 30 or more unexcused absences.

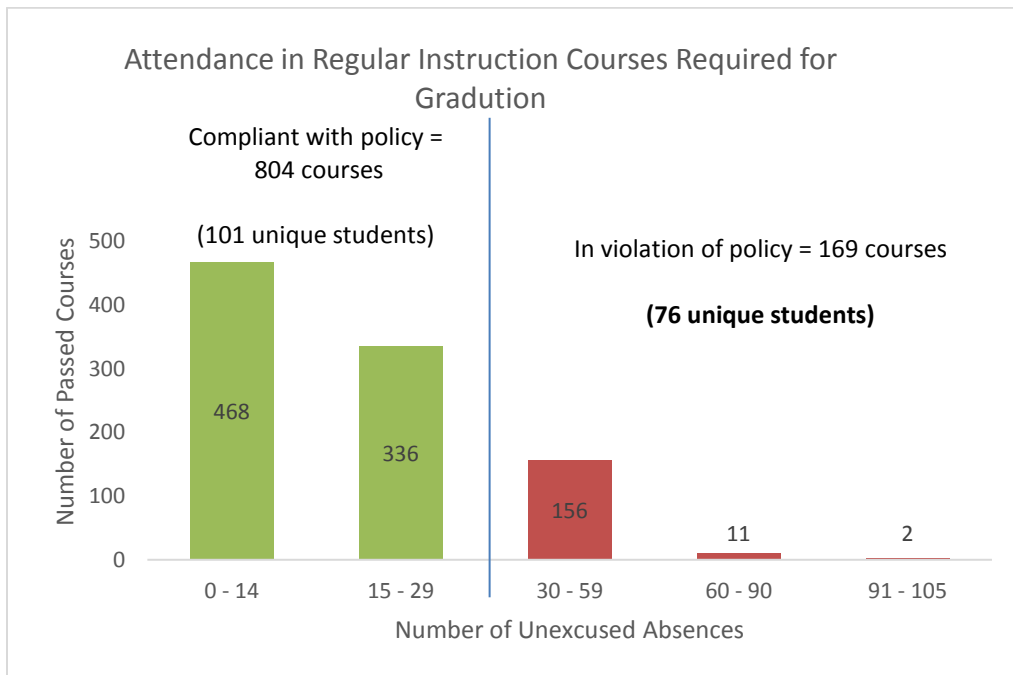


Figure 3: Attendance in Regular Instruction Courses Required for Graduation

Across these classes, **76 unique students passed despite excessive unexcused absences**. Additional data analysis, as outlined in Figure 4 indicates that among students with excessive unexcused absences, only three failed every course in which they had excessive absences.

| Attendance and Grading Summary by Student | | Count of | % of |
|--|--|-----------|--------------|
| Excessive Absences in Original Credit Courses Required for Graduation in SY16-17 | | Students | Graduates |
| Total number of graduates | | 177 | |
| Compliant | Did not have 30 or more unexcused absences in any course | 98 | 55.4% |
| | Failed all courses with 30 or more unexcused absences | 3 | 1.7% |
| Non-Compliant | Passed at least one course with 30 or more unexcused absences | 76 | 42.9% |

Figure 4: Excessive Absences in Regular Instruction Courses Required for Graduation in SY16-17

1. Observations from Interviews and Site Visits

To better understand the causes behind the school’s failure to comply with this policy, A&M presented individual results of these analyses to Ballou administrators and staff. Explanations varied based on roles, but several key themes emerged:

- **Teacher assumptions of autonomy:** Many Ballou teachers expressed the sentiment that they had complete autonomy over their grading, and felt they could interpret the Grading Policy. Many teachers said they had chosen not to apply these provisions of the policy, some admitted that they were unaware of the requirements of the grading policy, while others said they had been encouraged by school leadership to interpret policies to give students every chance possible.
 - Some teachers stated that they felt the need to interpret these policies loosely to support students based on difficult personal circumstances of Ballou students.
 - Other teachers pointed out that it would not be possible to meet performance goals and be rated as an effective or highly-effective teacher if they adhered to DCPS grading policies strictly.
- **Poor alignment of School and DCPS grading guidance:** Ballou High School administrators provided guidance throughout SY16-17 that directly contradicted the Grading Policy.
 - Varying, and sometimes contradicting instructions on Grading Policy contributed to confusion about Grading Policy. Teachers were instructed via email and in-person communications that the lowest grade possible at Ballou is a 50, and, separately, that students with missing assignments should be marked with an (M) and graded as a 50.
 - Many teachers stated that they felt intimidated or pressured to follow these more-lenient policies, and expressed concerns that they would be “IMPACTed out” -removed due to reduced Commitment to School Community (“CSC”) scores if they refused to follow this guidance.

- At a Ballou staff meeting in January 2017 administration reaffirmed the school’s policy that students failing due to absence should be given a mark of 50. An Administrator email to staff communicated the expectation that the minimum grade at Ballou should be a 50.
- **Teachers were pressured to provide opportunities to pass to students with excessive absences:** According to teacher interviews and communications reviewed by A&M, Ballou administrators communicated high passing percentage expectations to teachers. These expectations were communicated directly to teachers from the Principal and Assistant Principals in person, via staff meetings, and via email, and were formalized in the Ballou IMPACT rubric (discussed further in Pressure for Passing Grades below). Teachers were regularly encouraged to offer makeup work and extra credit to students regardless of excessive absences.

C. Credit Recovery Policy Adherence

DCPS’s credit recovery program relies on schools to administer credit recovery programs in accordance with policies, with very limited support from DCPS Central Office. In SY16-17, only one full-time, permanent employee was responsible for overseeing the programs across all of DCPS. Schools were provided limited guidance and/or support beyond the ECR Manual. Credit recovery as a program at Ballou High School has grown to become the rule, rather than the exception.

| Senior Class Credit Recovery Summary | | | | |
|--|-------------|--------------|-------------|--------------|
| Graduating Class | 2014 | 2015 | 2016 | 2017 |
| Total Regular Instruction Credits | 1,268.0 | 897.5 | 1,307.5 | 1,139.0 |
| Total Credit Recovery Credits | 103.0 | 123.5 | 121.0 | 137.5 |
| Total Credits | 1,371.0 | 1,021.0 | 1,428.5 | 1,276.5 |
| % of Total Credits from Credit Recovery | 7.5% | 12.1% | 8.5% | 10.8% |

Figure 5: Senior Class Credit Recovery Participation History

In SY16-17, 137.5 total credits were awarded via credit recovery courses, over 10% of the total credits awarded at Ballou High School. Among the graduating class of 177 seniors, 124 participated in some form of credit recovery during their high school career and 83 participated in some form of credit recovery during SY16-17. A&M’s analysis of credit recovery assessed Ballou High School’s adherence to policies and programs in the SY16-17.

D. Credit Recovery Attendance

1. ECR Attendance and Grading

The ECR Manual defines specific limits for student absences in credit recovery courses, stating that students may miss no more than three class sessions before they are ineligible to receive credit, and must be dropped from the ECR course. Despite these specific procedures on credit recovery attendance, many Ballou High School students enrolled in credit recovery logged absences in excess of the stated limits.

Figure 6 below summarizes the attendance of each student in each individual credit recovery course. Of a total of 91 ECR courses which resulted in credit, 80 courses were passed by students who had three or more unexcused absences.

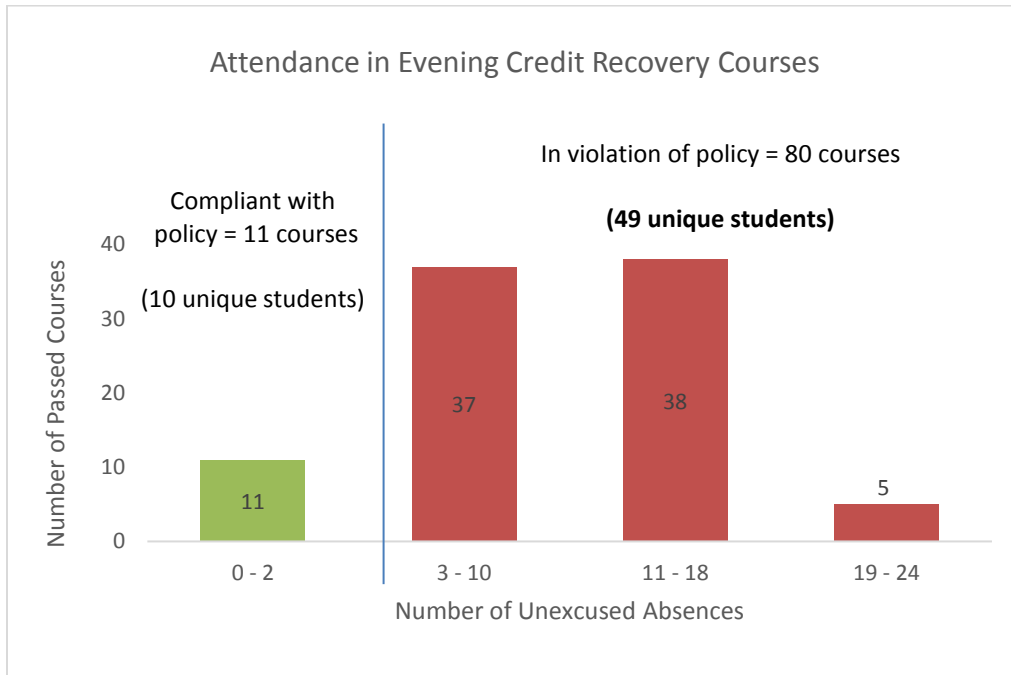


Figure 6: Evening Credit Recovery Absences

Across these classes, **49 unique students passed despite excessive unexcused absences**. Additional data analysis, as outlined in Figure 7 indicates that among students with excessive unexcused absences in ECR, only two did not pass any courses despite excessive absences.

| Attendance and Grading Summary by Student | | Count of | % of |
|--|---|-----------|--------------|
| Excessive Absences in Evening Credit Recovery Courses in SY16-17 | | Students | Students |
| Total number of graduates who took an evening credit recovery course | | 59 | |
| Compliant | Did not have 3 or more unexcused absences in any course | 2 | 3.4% |
| | Failed all courses with 3 or more unexcused absences | 8 | 13.6% |
| Non-Compliant | Passed at least one course with 3 or more unexcused absences | 49 | 83.1% |

Figure 7: Excessive Absences in Evening Credit Recovery Courses in SY16-17

2. Daytime Credit Recovery Attendance and Grading

Ballou High School also offered daytime credit recovery courses with different in-class time requirements from those specified in the ECR Manual. These courses met for one semester per course during the 45-minute short period “skinny block” of the school day. These classes were indicated in Aspen with the course code “RR”. Questions as to whether the Ballou High School administration acted appropriately in

administering this daytime credit recovery program are addressed in the other findings and observations section.

Figure 8 below summarizes the attendance of each student in each individual credit recovery course. Of a total of 63 daytime credit recovery courses which resulted in credit, 17 courses were passed by students who had 30 or more unexcused absences.

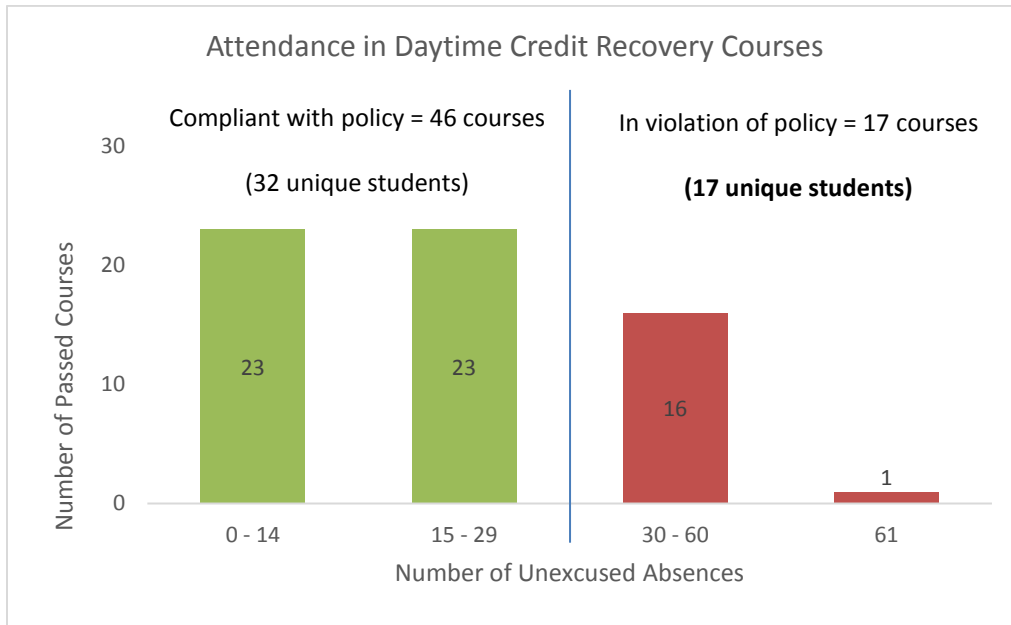


Figure 8: Daytime Credit Recovery Attendance Summary

Across these classes, **17 unique students passed despite excessive unexcused absences**. Additional data analysis, as outlined in Figure 9, indicates that among students with excessive unexcused absences in daytime credit recovery, only two did not pass any courses despite excessive absences.

| Attendance and Grading Summary by Student | | Count of Students | % of Students |
|---|---|-------------------|---------------|
| Excessive Absences in Daytime Credit Recovery Courses in SY16-17 | | | |
| Total number of graduates who took a daytime credit recovery course | | 49 | |
| Compliant | Did not have 30 or more unexcused absences in any course | 30 | 61.2% |
| | Failed all courses with 30 or more unexcused absences | 2 | 4.1% |
| Non-Compliant | Passed one course with 30 or more unexcused absences | 17 | 34.7% |

Figure 9: Excessive Absences in Daytime Credit Recovery Courses in SY16-17

The A&M team interviewed multiple credit recovery teachers and support staff. When questioned about the lack of adherence to attendance policies for credit recovery, teachers explained that they were unaware of credit recovery attendance requirements, or did not feel that adequate technological or

administrative supports were in place to remove students based on excessive absences. Additionally, teachers stated that, similar to failing students in regular instruction courses, the administrative burden to remove a student based on excessive absences in credit recovery was too high considering the number of students.

E. Original Credit Requirement

Credit recovery programs are intended to allow students to demonstrate mastery of a graduation-required course which they have previously taken and failed. At Ballou, this concept was either misunderstood or ignored. The ECR Manual states that a student may be approved to take an original credit course in ECR, provided: “(1) the course is needed to fulfill graduation requirements and the student will be potentially eligible for graduation by June or August 2017.” Such approvals are required to be made by the DCPS Academic Planning and Support Team. The DCPS Academic Planning and Support Team provided A&M with the list of approved exceptions in SY16-17. No Ballou High School graduates were included in the approved list provided; however, some DCPS Central Office communication contradicted this requirement. This issue is discussed further in Other Findings and Observations.

Of the SY16-17 graduates, 48 students received credit for credit recovery courses despite never having taken the original course. Additionally, 24 students took credit recovery courses concurrently with the original credit course and received credit for only the credit recovery course. Some students may have received credit in only the regular instruction course or in both the regular instruction course and the credit recovery course, in which case the student would have received credit for the course without the policy violation anyway. Overall, 67 unique students violated the original credit requirement for credit recovery courses.

| Credit Recovery Summary by Student Original Credit Requirement Violations in SY16-17 | Count of Students | % of Students |
|---|-------------------|---------------|
| Total number of graduates who took a credit recovery course | 83 | |
| Passed a credit recovery course without taking the original credit course | 48 | 57.8% |
| Passed only a credit recovery course while concurrently taking the original credit course | 24 | 28.9% |
| Total Unique Students Benefitting from CR Original Credit Violations | 67 | 80.7% |

Figure 10: Original Credit Requirement Violations in SY16-17

The ECR Manual also provides the School Credit Recovery Coordinator with a Student’s Certification for Eligibility Form that confirms the requirement that the original course was taken and failed before. This form is intended to confirm that students are eligible to take credit recovery; however, at Ballou, this form was not consistently used. According to administrators, credit recovery control processes were not consistently followed due to the high volume of students and relatively low level of staff time to support the credit recovery program. Ballou staff indicated they were unaware of the original credit requirements stipulated by the ECR Manual, and that they had received conflicting messages on this requirement.

In April 2017, the Office of the Chief of Schools distributed guidance via email to DCPS high school credit recovery staff, which instructed school staff to continue enrolling students in term 4 ECR courses for original credit if they were not on track to graduate. The communication also stated that no original credit courses were to be offered in summer school due to circumstances that were not detailed. **This guidance conflicts with procedures in the ECR Manual, and indicates the DCPS Central Office was aware of and encouraging use of credit recovery for original credit at DCPS High Schools.**

F. Consolidated Findings

To identify the combined effect that non-adherence to DCPS policies and DCMR regulations has had on the 2017 graduation rate at Ballou High School, A&M developed a consolidated workbook which includes all 2017 Ballou High School graduates and evaluates whether their graduation was facilitated by non-adherence to any of the requirements analyzed above. For each of the 177 students who were reported to have graduated, A&M has identified policy violations which aided their timely graduation, focusing only on courses which were required to graduate.

A&M’s analysis found that **three total graduates did not complete all required courses** needed to graduate and **76 students benefited from policy violations related to attendance-related grading** in their SY16-17, indicating that, if not for the policy violation the students would have failed and not graduated. A&M’s analysis found that **48 individual students** were enrolled inappropriately in credit recovery without having taken the original credit course and 24 students earned credit from a credit recovery course taken concurrently with the original credit course.

Figure 11 summarizes A&M’s key findings in this investigation. Each line reflects the number of unique students benefiting from policy violations in one or more course. These findings reflect only violations observed to have taken place in SY16-17.

| Consolidated Findings | Count of Students | % of Graduates |
|--|-------------------|----------------|
| Total number of graduates | 177 | |
| Missing Required Coursework | 3 | 1.7% |
| Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation | 76 | 42.9% |
| Passed Despite Excessive Absences in Evening Credit Recovery Courses | 49 | 27.7% |
| Passed Despite Excessive Absences in Daytime Credit Recovery Courses | 17 | 9.6% |
| Credit Recovery Earned as an Original Credit | 48 | 27.1% |
| Credit Recovery Earned Taken Concurrently with Original Credit Course | 24 | 13.6% |
| Total Graduations Due to Policy Violations | 113 | 63.8% |
| Total Graduations without Policy Violations | 64 | 36.2% |

Figure 11: Consolidated Findings

To demonstrate the degree to which individual students are affected by multiple policy violations and account for the overlap between issues identified in this report, Figure 12 below summarizes the number of students affected by unique policy violations.

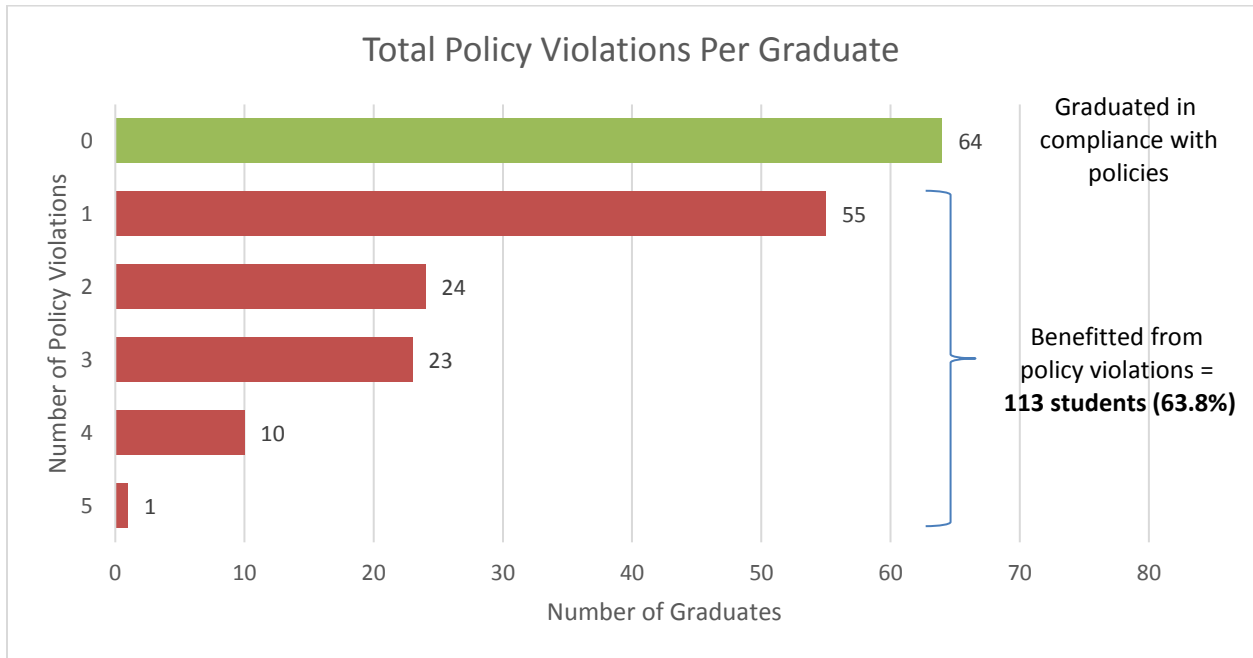


Figure 12: Total Policy Violations per Student

This final summary demonstrates that a total of 113 students benefited from a total of 222 policy violations, and summarizes A&M’s key finding that **the total number of students who graduated with the assistance of these policy violations was 113 out of 177 (63.8%).**

V. OTHER FINDINGS AND OBSERVATIONS

A. Administrative Burden to Fail Students

Teachers at Ballou described direct and indirect pressures from school-level leadership, particularly the Principal and Assistant Principals to pass, advance, and graduate students regardless of content mastery. Administrators required teachers to demonstrate and document the completion of many interventions for any student receiving a failing grade, often despite the teacher's communication that students were excessively absent and performing little to no school work. The Administrative burden to fail students in accordance with grading policy is extremely high and generates a significant amount of extra work for teachers who wish to adhere to the DCPS grading policy. In many cases teachers were left with the choice of developing additional documentation of supports and missing strictly enforced grading deadlines, possibly incurring negative personnel/review repercussions, or simply passing students. The Ballou Administration required this process for students who were failing due to excessive unexcused absence, despite the DCMR requirements that students with greater than 30 unexcused absences shall receive a failing mark for the year.

B. Pressure for Passing Grades

Many teachers expressed that they felt significant direct and indirect pressures to pass students. Teachers shared concerns that their individual performance evaluations in the IMPACT (DCPS's performance management system) would be negatively affected by adhering to attendance-related grading policies. Teachers expressed that most of this guidance and pressure was received from Administrators and other teachers through unofficial communications such as in-person meetings or phone calls.

Teachers stated that specific metrics included in their performance reviews reflected expectations for passing students which were unrealistic given student attendance issues at Ballou. The IMPACT system is DCPS's key performance tool for teachers, which contributes to compensation, promotion opportunities, and retention. A&M reviewed IMPACT documentation, including DCPS-wide documentation and the CSC rubric from SY16-17. CSC typically accounts for 10% of the teacher evaluations, and teachers are scored from 1 (lowest rating) to 4 (highest rating).

According to Ballou's rubric, which was developed in cooperation with DCPS Central Office, teachers are scored on several metrics for CSC, including positive school climate, which evaluates teachers' contributions to the learning environment. According to the SY16-17 rubric A&M received, to be graded as a level 3, 70- 80 percent of students must pass the semester with a grade of D or higher. To be graded as a level 4, 81 percent or more of the teacher's students must pass with a grade of D or higher.

Although this metric is just one of five metrics that contribute to CSC evaluations, this metric could contribute to the failure to enforce grading policies at Ballou. The CSC rubric reviewed did not indicate teachers are evaluated on their adherence to grading or attendance policies as part of the commitment

to school community review, and Ballou administrators acknowledged that they had not consistently monitored or evaluated compliance with the policy requirements discussed within this report.

C. Inadequate Training, Tools, and Supports

In support of this investigation, A&M reviewed the Tools, Supports, and Trainings provided to administrators and teachers to enable effective implementation of DCPS grading, attendance, and credit recovery requirements, and identified many areas in which DCPS implemented systems, policies, or procedures with inadequate training to support their appropriate adoption.

1. Grading Policy

The current Grading Policy was established for SY15-16. According to interviews with DCPS's Office of Secondary Schools, Ballou administrators, and teachers the Grading Policy's implementation included no formal on-site training for teachers at Ballou. Based on A&M's interviews the policy was distributed via email to school-level administrators, and the roll-out of this standardized, district-wide policy was left to the individual schools. Additionally, new teachers have not been provided formal training on the policy as part of their onboarding process with DCPS or Ballou. As a result, many teachers were partially, or totally unaware of the requirements of the policy until a series of trainings took place in December 2017 in the wake of the media reports on Ballou.

2. Aspen Gradebook Platform

Teachers and administrators demonstrated widespread misunderstanding of the use of the Aspen gradebook platform and illustrated gaps in the resources that DCPS dedicated to providing teacher-facing customer support for the platform, the current functionality of the platform, and the insufficient training that DCPS carried out when it rolled out the platform at Ballou.

- When DCPS transitioned from the Student Tracking and Reporting System ("STaRS") to Aspen, DCPS provided no formal training to staff at high schools, instead relying on a "train-the-trainer" approach, designating one teacher to be responsible for teaching the entire staff at Ballou.
- Multiple teachers maintained that it was difficult to determine how many unexcused absences a student had logged. Further investigation found that the Aspen platform does not actively tally unexcused absences, and would require a teacher to manually count all unexcused absences for each student to determine the cumulative total. While not impossible, this would present a hurdle to implementation of the absence-related component of the Grading Policy.
- Some teachers misinterpreted the "M" grade within Aspen to signify "missing" instead of "medical." Based on our interview, this issue is linked to a previous designation under the STaRS system. This illustrates the limited understanding that teachers had of this transition. Given that the medical grade essentially prompts Aspen to ignore a term grade, this code could remove grades in cases where students were truant.

- Teachers are responsible for configuring their own gradebooks in compliance with DCPS-wide policy. Instead of one configuration for all grading standards for each subject matter being performed by Aspen subject matter experts, hundreds of gradebooks are configured by teachers with limited training and experience in Aspen.

3. Credit Recovery Lack of Support

DCPS operates a large and highly decentralized credit recovery program. During much of SY16-17, only a single individual worked full-time to facilitate and oversee the operations of credit recovery programs from the central office level. Academic Planning and Support provided the ECR Manual and additional administrative (payroll, scheduling, etc.) guidance to DCPS high schools, but did not consistently provide oversight to credit recovery programs, or verify adherence to the requirements of the ECR Manual. Ballou High School did not conform to the eligibility requirements stated in the ECR, or appropriately utilize its tools and controls. Had DCPS supported credit recovery with appropriate, consistent staffing, and tools, such as analysis on original credit or attendance requirements, variations from policy could have been easily detected.

D. Policies Vague or Undefined

1. Credit Recovery

DCPS's Grading Policy includes limited references to credit recovery, specifying only that credit recovery courses may not replace the grades awarded in original courses and that they have the same GPA and credit value. The ECR Manual, widely distributed and used across DCPS High Schools, was never formalized as a policy by DCPS leadership, and lacks clarity around the implementation of alternate methods of credit recovery and the requirements for record-keeping. Given that the ECR Manual is not official policy, it is unclear whether the procedures outlined in it are actually requirements for the school.

a) Unclear Integration of Credit Recovery with DCMR Seat Hour Requirements

Ballou administrators and staff lead credit recovery programs which awarded many credits to students who had taken and failed core, graduation-required courses prior to taking credit recovery as well as to students who had never taken the original credit course.

Most credit recovery schedules at Ballou do not appear to meet the DCMR requirement for 120 seat hours to receive credit for a course. Based on A&M's review of policy documentation and schedules, it is unclear how DCPS considers these compressed courses to meet this requirement.

b) Daytime Credit Recovery

During the 2016/17 school year, Ballou operated a daytime credit recovery program which is not specifically allowed in accordance with the ECR Manual. However, the use of daytime credit recovery has been encouraged by DCPS Office of Academic Planning and Support through the School Year Scheduling Book. Ballou's offering of daytime credit recovery was approved as part of the Master Schedule, which communicates all course offerings to DCPS. It is unclear whether DCPS Academic Planning and Support approved the semester-long classes which meet for an estimated total of 70 hours, and award one full credit.

Until the second semester of SY16/17 Ballou did not delineate between ECR and daytime credit recovery – in late 2016, DCPS Academic Planning and Support instructed Ballou to track daytime credit recovery courses separately, and the Cluster 8 Instructional Superintendent approved the reallocation of funding from ECR to daytime credit recovery.

E. Reliance on Credit Recovery

In addition to many students taking credit recovery before having failed the original credit course, A&M identified several students who were taking high levels of credit recovery. The ECR Manual specifies the hours of attendance to be either 3 hours after school for nine weeks, or 1.5 hours after school for 18 weeks, however, many students at Ballou were enrolled in several credit recovery classes in the same quarter. For example, one student failed four core courses senior year, while taking three courses in credit recovery in the fourth quarter and passing all three to meet graduation requirements. Thirteen of Ballou's 2017 graduates earned more than 20% of their credits through credit recovery courses with one student receiving 10 of a total 25.5 credits (40%) through credit recovery.

F. Credit for Partial Course Completion

At Ballou High School, the core required mathematics courses Algebra 1 and Geometry 1 are offered to some students as split courses, with one credit of instruction being offered for each of Algebra 1A and 1B, and for Geometry 1A and 1B respectively. This allows students who require additional support to learn these fundamental classes with twice the level of instruction. DCMR, and Grading Policy do not clearly account for these extended versions of courses and how they contributed to graduation requirements. At Ballou, 20 graduating seniors gained credits for the 1B component of a math class without taking and/or passing the 1A component, indicating that the student may not have mastered the curriculum content for the first half of the class. DCPS's Aspen grading system recognized 1B as having met the requirement for the full class, and these 20 students were awarded diplomas.

1. Community Service Hours Verification Inconsistent

During Ballou site visits, A&M assessed the degree to which Ballou had appropriately documented student community service hours. According to the 2017 Actual Graduates Report, all graduates met the 100-hour community service graduation requirement. To assess the degree to which community service hours are documented, A&M reviewed a limited sample number of community service verification forms, which are kept alphabetically in binders for the class of 2017. A&M reviewed the first binder in order covering 66 students, as summarized in Figure 13. Of the forms reviewed, the hours verified on the community service forms matched the hours on the graduate reports for 20 students (30.3%), who all met the 100-hour requirement. The hours on the forms did not match the graduate reports for 41 students (62.1%), 22 of whom met the 100-hour requirement and 19 of whom did not. Community service verification forms were not found for five (7.6%) students.

| Review of a Sample of Community Service Verification Forms | Count | % of Sample |
|--|-----------|--------------|
| Hours on the CS verification forms matched the hours on the graduate report | 20 | 30.3% |
| Met the 100-hour requirement | 20 | 30.3% |
| Hours on the CS verification forms did not match the hours on the graduate report | 41 | 62.1% |
| Met the 100-hour requirement | 22 | 33.3% |
| Did not meet the 100-hour requirement | 19 | 28.8% |
| Did not find any CS verification forms | 5 | 7.6% |
| Total number of students | 66 | |

Figure 13: Community Service Verification

In addition, A&M noted numerous community service verification forms where students were given credit for working at non-approved entities, such as at a daycare or a gym. Approved entities are 501(c)(3) organization or federal, state, or local government agencies. Further, a few forms had an organization that was denied, yet the student was given partial hours. Some forms did not fill in the organization at all. Rather than logging the hours each day volunteered, several forms lumped together hours for weeks or months at a time. Ballou staff reported that community service verification forms are spot checked before hours are entered into the system and only a sample are reviewed thoroughly.

VI. NEXT STEPS

A&M will continue its audit and investigation to include all DCPS high schools. As of January 12, 2018, A&M teams have visited 10 additional DCPS high schools, with all remaining schools to be visited during the week of January 15, 2018. Each school visit includes interviews with several teachers, including at least one involved with credit recovery. Our teams also speak with the principals, assistant principals, and counselors who oversaw seniors in SY16-17 as well as credit recovery coordinators. A&M will perform similar data analysis across the entire 2017 DCPS graduating class, and perform records review of a sample of students from each high school. Comprehensive findings and observations will be presented in A&M's Final Report, to be delivered to OSSE on January 26, 2018.