

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
*Office of the State Superintendent of Education*



Public Oversight Roundtable on  
**Graduation Rate Accountability**

**Testimony of**  
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Before the

Committee on Education  
The Honorable David Grosso, Chairman

Council of the District of Columbia  
Room 412  
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Chairman Grosso, members, and staff of the Committee on Education, I am Hanseul Kang, and I serve as the State Superintendent of Education for the District of Columbia. I am pleased to join you for this oversight roundtable on Graduation Rate Accountability.

In February, I appeared before this Committee to preview steps that OSSE would take to address the findings in the Alvarez & Marsal Graduation and Attendance reports released in January 2018. At that time, I stated that OSSE would take the following steps:

First, OSSE would provide DCPS with technical assistance and use focused monitoring to support compliance.

Second, OSSE would create a regulatory framework to establish minimum practice standards for credit recovery at the state level that would apply to all LEAs; and

Third, OSSE would collect and circulate actionable data to identify needs and inform decision-making that would accelerate improvement.

Today, I will share the progress that OSSE has made in each of these three areas, as well as provide any actions that OSSE will take in the future on these three commitments.

### **Technical Assistance & Monitoring**

In prior testimony on this topic, I stated that OSSE would provide DCPS with directed technical assistance focused on coordinating compliance with policies, and providing supports to ensure that current DCPS seniors can be best positioned to make progress towards graduation. Further, through our monitoring efforts, OSSE would focus on whether there has been progress or growth in strengthening DCPS internal controls, as well as oversight to provide structure, support, and accountability to schools. I want to share the steps OSSE has taken, along with DCPS, to satisfy this commitment.

First, on March 16, 2018, OSSE notified the DCPS Interim Chancellor in writing that OSSE would require the local education agency (LEA) to complete a self-assessment based on the investigation's five recommendations for DCPS. In addition, for each recommendation, it described specific actions that needed to be taken in order to demonstrate systemic improvement. Using the self-assessment, DCPS had to determine their level of agreement with the recommendation; whether it believed that the recommendation would also be applicable to the middle and/or elementary school levels, in addition to high schools; and the degree to which the recommendation is being executed currently. DCPS had the opportunity to provide rationale and evidence to support its assessment.

Second, DCPS was required to submit a work plan that addressed the recommendations in the self-assessment, as well as any additional actions that it is taking to ensure systemic improvement. For each completed action, DCPS had to submit evidence of completion. For each proposed action item, DCPS had to submit evidence of completion for each completed action; a description, timeline, and proposed evidence of completion for each proposed action item; and a proposed system of oversight to ensure compliance with law, regulation, and policy related to grading, attendance, and promotion/graduation.

DCPS submitted these materials to OSSE as requested. OSSE provided feedback to DCPS and has agreed on a final work plan. Over the next two years, OSSE will continue to monitor DCPS, biannually, for compliance with the work plan. For each monitoring cycle, DCPS will describe its compliance with the set of actions described in the work plan and submit evidence and rationale to support their description of implementation efforts.

In conclusion, DCPS has been timely and responsive to OSSE's requests, has clearly made substantial efforts to adopt and implement the recommendations of the Alvarez & Marsal report, and demonstrated progress in doing so. At the same time, because so many of the recommendations required significant steps that remain in progress, OSSE will need to continue to monitor implementation closely over time. OSSE will continue to ask DCPS for additional verification or evidence where needed, to ensure effective monitoring of its implementation and follow-through on commitments over the next two years.

During the investigation into graduation and attendance, OSSE also reviewed implementation of the Public Charter School Board's (PCSB) policies on high school graduation and attendance, and their oversight of public charter LEAs on these matters. OSSE found that PCSB largely follows their existing policies, but recommended that PCSB update their Transcript Audits Policy and all related supporting materials, including training materials, and fully document and formalize existing practices. In response, PCSB adopted a Transcript Audit Policy that explains the process by which the PCSB verifies the status of 9<sup>th</sup> grade students and ensures they are on-track to graduate in four years. The policy also outlines the process in which the PCSB will ensure 12<sup>th</sup> grade students are deemed certified graduates. In addition, PCSB adopted the High School Graduation Requirements Approval Process Policy, which requires charter LEA graduation requirements to match or exceed those for DCPS high school students, and requires charter LEAs to forward these policies annually to the PCSB for review. Finally, the PCSB adopted a credit recovery policy for charter LEAs, which is beneficial for consistency across LEAs.

### **Regulatory Framework for Credit Recovery**

The Alvarez & Marsal report found that DC, like many other jurisdictions, lacked state-level regulations that govern the use of credit recovery courses across all LEAs. We recognize that credit recovery is an important tool that helps students stay on track for graduation, and that it should be used in a manner that truly supports student learning and does not compromise academic standards. Therefore, OSSE is in the process of working with our partners at DCPS, PCSB, and the State Board of Education to promulgate regulations that set minimum standards for the use of credit recovery courses towards graduation.

Our proposed draft rulemaking has a few key components. First, we require all credit recovery courses to be aligned with statewide content standards, and have comparable grading policies as the underlying course. Second, we reserve credit recovery only to students that have completed and failed the course. Third, we require each LEA to issue a policy that governs the delivery of credit recovery courses and includes specific components on student eligibility, attendance, enrollment, assessment, and parent notification.

Lastly, we also recognize there is a need for public information on the use of credit recovery courses in our schools, so our proposed rulemaking seeks to collect and report out actionable information, while remaining cognizant of the impact of such requirements for schools and LEAs. The proposed regulation requires that local education agencies submit an annual compliance report that contains information on

the number of students who fail courses, are referred to credit recovery, and successfully pass the credit recovery course.

It is important to outline some consistent foundational rules on credit recovery for the upcoming school year and OSSE is poised to do that; however, schools and LEAs are best positioned and charged to make curricular and instructional choices in their school, including credit recovery courses. We urge the State Board of Education to continue to work with us to put emergency and proposed regulations in place and lay a statewide foundation on the use of these courses. Very few states have credit recovery policies and regulations, and the proposal is on its way to being one of the most, if not the most, rigorous in the country. The State Board of Education will take public comment on the emergency and proposed regulations at their public meeting on June 20, and I look forward to hearing the public's thoughts at that time. The emergency and proposed rule will also undergo the standard public comment period as all regulations, and the final rulemaking must be also approved by the State Board of Education.

### **Graduation Data**

In my testimony at the most recent public roundtable on Improving School Attendance, I shared with this Committee, and the Committee of the Whole, the steps OSSE is taking to support accurate collection and reporting of attendance data. Specifically, I shared with the committee the tools that we have made available to local education agencies to verify and address their attendance data, such as a Data Error Application which helps schools review their data for accuracy.

OSSE will also be drawing further attention to issues of attendance and chronic absenteeism in the state's new school accountability system and on the new school report cards, which will be issued in December 2018 for the first time, and annually going forward. The new accountability system will also include the four-year adjusted cohort graduation rate, which is calculated according to specific regulations and guidance from the US Department of Education to ensure all states are consistently measuring graduation rates. At the same time, it will also include a new alternative graduation rate that gives credit to all schools for every student who graduates, regardless of how long it takes or their starting cohort, so that they are recognized for their support of all students.

### **Conclusion**

Thank you again, Chairman Grosso, for the opportunity to testify on this critical work. I look forward to our collective efforts on this issue. I am happy to answer any questions that you may have.