



## District of Columbia Public Schools (DCPS) Graduation Documentation Review

### Introduction

In January 2018, the Office of the State Superintendent of Education (OSSE) conducted an [independent analysis](#) of student-level attendance and graduation outcomes at DC high schools<sup>1</sup> and on the extent to which District of Columbia Public Schools (DCPS) complied with attendance and graduation policies in its high schools.<sup>2</sup> At that time, OSSE contracted with an outside consulting firm, Alvarez & Marsal (A&M), to review policies and procedures, conduct interviews with key staff, analyze data, and review student records from the 2016-17 school year to determine their potential impact on graduation rates.

The final A&M report<sup>3</sup> made four findings:

1. Credit recovery was misused at most DCPS high schools, often violating DCPS policies and the District of Columbia Municipal Regulations (DCMR);
2. Attendance-related grading policies were rarely followed across DCPS;
3. There was lack of support and oversight from DCPS resulting in policy violations across high schools; and
4. Most DCPS high schools exhibited a culture of passing and graduating students who failed to meet specific requirements.

In accordance with its oversight authority as the state education agency (SEA) for the District of Columbia, OSSE released a monitoring report<sup>4</sup> in June 2018 describing required actions by DCPS in response to the investigation of DCPS attendance and graduation practices. At that time, OSSE adopted the work plans submitted by DCPS and will be monitoring DCPS against the work plans on the following timeline over the next two years. OSSE will report on progress against the work plans as it is critical to ensure that policies and procedures put in place by DCPS were implemented as described in the work plans. Table 1 provides an estimated monitoring timeline over the next two years.

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<sup>1</sup> [“Analysis of Attendance and Graduation Outcomes at Public High Schools in the District of Columbia.”](#) Office of the State Superintendent of Education. Jan. 16, 2018.

<sup>2</sup> Note that OSSE reviewed the Public Charter School Board’s (PCSB) oversight of public charter high schools with regard to graduation. OSSE found that the PCSB had a rigorous review process in place but also made recommendations on ways that their policies and practices could be improved. The PCSB adopted those recommendations. This analysis is available in the Jan. 16, 2018 report.

<sup>3</sup> [“Final Report: District of Columbia Public Schools Audit and Investigation”](#) Office of the State Superintendent of Education. Jan. 29, 2018.

<sup>4</sup> [“OSSE’s June 2018 Monitoring Report: Attendance and Graduation Outcomes at DCPS.”](#) Office of the State Superintendent of Education. June 13, 2018.

**Table 1: DCPS Graduation and Attendance Monitoring Timeline**

DCPS Reports to OSSE on Progress Against Work Plans	OSSE Requests Clarifying Information (as needed)	OSSE Issues Corresponding Monitoring Report
October 2018	November 2018	December 2018 <sup>5</sup>
April 2019	May 2019	June 2019
October 2019	November 2019	December 2019
April 2020	May 2020	June 2020

Further, as noted in the June 2018 Monitoring Report, during this two-year monitoring period OSSE will also continue to ask DCPS for any additional verification or evidence where needed to ensure effective monitoring. Accordingly, in addition to requesting submission of DCPS' first biannual reporting of progress against the work plans, OSSE requested documentation for a sample of students identified as certified graduates for 2018 to determine whether policies and practices pertaining to graduation and attendance were followed for certified 2018 graduates.

## Purpose of Report

As the SEA, OSSE is required to report a four-year adjusted cohort graduation rate for high schools, local education agencies (LEAs), and the state.<sup>6</sup> This method for calculating the four-year adjusted cohort graduation rate is federally mandated<sup>7</sup> and is one measure used to track the outcomes of high schools. The purpose of this document is to summarize the manner in which OSSE reviewed documentation and describe any findings related to reporting of DCPS' four-year adjusted cohort graduation rate for the 2017-18 school year.

## Document Request

From the current list of students certified in 2018 as four-year graduates by DCPS, OSSE pulled a sample of 218 students. This sample represented 10 percent of the certified graduate list. The sample contained students from all DCPS high schools but oversampled graduates from comprehensive high schools and students with 30 or more full-day unexcused absences.<sup>8</sup> OSSE oversampled comprehensive high schools

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<sup>5</sup> This document will be incorporated into OSSE's December 2018 Monitoring Report.

<sup>6</sup> Adjusted Cohort Graduation Rate: The four-year adjusted cohort graduation rate is the number of students who graduate in four years and a subsequent summer with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class. For any given cohort, students who are entering ninth grade for the first time form a cohort that is subsequently "adjusted" by adding any students who transfer into the cohort later during the next three years and subtracting any students who transfer out, emigrate to another country, or are deceased during that same period. See 20 U.S.C. §§ 6311(h)(1)(C)(iii)(II) and 7801(25)

<sup>7</sup> See 20 U.S.C. § 7801(25); ["Every Student Succeeds Act High School Graduation Rate Non-Regulatory Guidance."](#) US Department of Education. January 2017.

<sup>8</sup> Full-day attendance is based on the definition of "present" in accordance with 5-A DCMR § 2199. Present is defined as "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." Note that this is colloquially known in the District as the "80/20 rule."

because most of the policy infractions identified by A&M took place in DCPS' comprehensive high schools. OSSE oversampled students with 30 or more full-day unexcused absences because DCPS regulations that were in effect for the 2018 graduates mandated that a student shall receive an automatic failure due to attendance when a student accumulated 30 or more unexcused absences in a course,<sup>9</sup> unless there was a successful appeal.<sup>10</sup> OSSE requested the following documentation from DCPS:

1. For **each DCPS high school** in the sample:
  - A. Principal Graduation Verification Form for June Graduates<sup>11</sup>
  - B. Principal Graduation Verification Form for Summer Graduates
2. For **each student** in the OSSE sample:
  - A. Graduation Transcript Review Checklist
  - B. Transcript
  - C. For any student flagged by OSSE as having 30 or more full-day absences:
    - Course-level attendance for the 2017-18 school year in courses required for graduation; and
    - Supporting documentation for approved policy variances, e.g., successful Appeal of Grade Reduction and Failure Due to Absence
  - D. For units earned in Semester 2 (Term 3 and Term 4)<sup>12</sup> or summer school:
    - Documentation to support any units earned through credit recovery or summer school, including attendance; and
    - Documentation to support any approved policy variances, e.g. successful Appeal of Grade Reduction and Failure Due to Absence.

## Document Review Process

As the SEA, OSSE does not confer diplomas to students graduating from DCPS. OSSE, along with the State Board of Education, sets graduation requirements. Instructional decisions, such as determining satisfactory completion of graduation requirements, is an LEA and school decision. OSSE has neither the capacity nor the expertise to review transcripts for every graduate in the District. However, as part of OSSE's monitoring process of DCPS to ensure systemic, sustained improvement in DCPS grading, attendance, promotion, and graduation policies and procedures, OSSE determined it was necessary to

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<sup>9</sup> 5-B DCMR § 2103.6. Please note: Due to the definition of present, which is based on as student being in school for at least 80 percent of the full instructional day, there is not necessarily a direct correlation between accumulating 30 full-day unexcused absences and 30 unexcused absences in a course. For example, a student who routinely skips the last two hours of a school day may have excellent course attendance in courses that occur in the morning.

<sup>10</sup> Local regulations and DCPS policy outlined the appeals process. 5-B DCMR § 2103.7 *et seq.*

<sup>11</sup> A Principal Graduation Verification Form requires the principal to acknowledge that graduates were certified in accordance with DCPS policies and procedures.

<sup>12</sup> The investigation into graduation and attendance took place in January 2018 which was the second semester of senior year for the graduating class of 2018. OSSE reviewed violations that occurred in the second semester since those occurred after the A&M report was issued and DCPS implemented subsequent corrective action responses. In addition, DCPS later clarified that, for two Opportunity Academy high schools, who operate on trimester schedules, credit recovery policies were applied to Trimester 2 and Trimester 3.

conduct an analysis of the 2018 DCPS graduates in a manner similar to the A&M investigation in January 2018.

Relying on the documentation submitted by DCPS for the students in the sample, OSSE conducted a review to determine whether the students' graduation status was certified in accordance with the policies and practices governing graduation and attendance, in the manner set forth below:

(I) To ensure that internal processes for certifying graduates were followed consistent with DCPS training documents and the work plan, OSSE examined the following questions:

For each high school in DCPS, is there a completed Principal Graduation Verification Form submitted?

For each student identified in the sample, is there a completed Graduation Transcript Review Checklist?

For each student identified in the sample, is there a certified, completed transcript?

(II) To ensure that graduates were certified in accordance with District of Columbia graduation requirements set forth in 5-A DCMR § 2203.3 and the DCPS Graduation Requirements Policy, OSSE examined the following questions:

For each student, did the transcript indicate that the course requirements for graduation were met?

For each student, did the transcript indicate the completion of the 100-hour community service requirement?

(III) To verify to what extent credit recovery was appropriately used to award units toward graduation to students who previously attempted the underlying course<sup>13</sup>, OSSE examined the following questions:

For each credit recovery course indicated on the transcript in semester 2 of the 2017-18 school year, is there an "F" recorded as the grade for the underlying course?

(IV) To ensure that failure due to attendance was applied consistent with 5-B DCMR § 2103 et seq. the DCPS Attendance and Truancy Policy, and the DCPS Secondary Grading and Reporting Policy, OSSE examined the following:

For students who were flagged with 30 or more unexcused full-day absences, course-level attendance data was checked to determine if any student received a unit toward graduation for a course where the student had 30 or more unexcused absences.<sup>14</sup>

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<sup>13</sup> There were no District-wide regulations governing credit recovery across all schools during the 2017-18 school year, or currently. However, OSSE did issue non-regulatory guidance on credit recovery in September 2018 and DCPS also issued an updated *Credit Recovery Policy* in November 2018. During this document review, OSSE examined the transcripts to determine to what extent the credit recovery policies were applied correctly. Conducting this analysis was necessary as DCPS' use of credit recovery courses in a manner inconsistent with DCPS policy was a key finding in the January 2018 A&M report.

If the student had 30 or more unexcused absences for a course, did the student receive an F in the course? If not, is there supporting documentation of a principal justification or an appeal?

(V) To ensure that the requirement for summer school attendance was applied consistently with the DCPS Student Promotion Policy, OSSE examined the following questions:

For summer graduates:

- A. Did the student earn no more than 2 units in summer school?
- B. Does the student have no more than three unexcused absences from summer school?
- C. Did the student receive a passing grade in the summer school course required for graduation?

## Documentation Review Findings

DCPS submitted all requested documents, including all school-level Principal Graduation Verification Forms (forms used to submit each school's list of verified graduates).

Of the 218 certified graduates sampled, 205 (94.0 percent) met the course requirements for graduation without the impact of any policy violations. The remaining 13 (6.0 percent) of students met the requirements for graduation with the impact of one or more<sup>15</sup> policy violations in the second semester of the 2017-18 school year. Table 2, Graduations Impacted by Policy Violations in SY 17-18 - Attendance, summarizes those findings.

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<sup>14</sup> Note that OSSE does not collect course-level attendance from schools and LEAs. OSSE collects daily attendance consistent with definition of "present" as set forth in 5-A DCMR § 2199. LEAs mark a student as present for the day in OSSE's attendance feed when present for at least 80 percent of the school day.

<sup>15</sup> Nine of the 13 students benefited from one violation. Four of the students benefited from two policy violations but one of the students had two of the same violations.

<b>Table 2: Graduations Impacted by Policy Violations in SY17-18 - Attendance<sup>16</sup></b>		
<b>Total Number of Graduates Sampled</b>	<b>218</b>	
	<b>Count of Graduates</b>	<b>% of Sampled Graduates</b>
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	0	
Passed Despite Excessive Absences in Credit Recovery Courses After the Start of Term 3 of School Year 2017-18	4	1.8%
Passed Despite Excessive Absences in Summer School Courses in Summer 2018	5	2.3%
Credit Recovery Earned as an Original Credit	7	3.2%
Credit Recovery Taken Concurrently with Original Credit Course	0	
<b>Total Graduates in Sample Impacted by Policy Violations</b>	<b>13</b>	<b>6.0%<sup>17</sup></b>
<b>Total Graduates in Sample Not Impacted by Policy Violations</b>	<b>205</b>	<b>94.0%</b>

DCPS proactively identified policy violations for graduates in the sample. Along with submitting requested student records, DCPS provided an overview that summarized the findings and provided additional context and planned actions to ensure full compliance moving forward. These action steps, as described by DCPS, are outlined below.

- **Attendance Policy:** DCPS will continue to automate the course failure upon accruing 31 absences in alignment with code) and will also issue early warning notifications to families at 10, 15, and 25 unexcused absences.
- **Credit Recovery Attendance:** Credit recovery was suspended during Term 1 of the 2018-19 school year to provide time for DCPS to draft and receive feedback on a formal credit recovery policy. The new policy (finalized on Nov. 5, 2018) indicates that students should be withdrawn from credit recovery upon accruing 18 unexcused absences. Early warning notifications will be issued to families at six, nine, and 15 unexcused absences, and students will be automatically withdrawn from the course at 18 unexcused absences. In addition, this indicator will be tracked in the monitoring framework.
- **Credit Recovery Scheduling:** DCPS has published a new credit recovery policy, issued specific implementation guidance, and provided training which will be ongoing. DCPS also created a certify report which runs daily and flags instances of students being enrolled in credit recovery prior to original credit so this can be addressed immediately. In addition, DCPS has included this

<sup>16</sup> Count of students by policy violation is not unique. Graduates may have more than one policy violation. However, Total Graduates Impacted by Policy Violations is a count of unique students.

<sup>17</sup> Note that this number should not be extrapolated to the entire population of certified graduates for the class of 2018 because the sample heavily included students from comprehensive high schools and those with greater than 30 unexcused full-day absences.

indicator in the monthly monitoring framework so central office staff can ensure schools are rectifying these scheduling errors upon receipt of that information.

- **Summer School Attendance:** Planning has begun for summer school 2019. The work plan includes timely training of all summer school staff on policies and expectations. In addition, schools will receive regular reports on unexcused absences by course and summer school principals will be expected to verify all attendance records prior to certifying course marks.

## Analysis

Based on the review of the documentation for this sample of 2018 certified graduates, DCPS has made progress since the January 2018 A&M investigation into DCPS' graduation and attendance policies. Compared with the rates of compliance presented in the A&M report, compliance rates for the graduating class of 2018, based on the sample are much improved. A significant number of policy violations outlined in the A&M report were for excessive absences in regular instruction courses required for graduation; OSSE did not find any violations of that nature in this sample of 2018 certified graduates. However, some compliance issues exist in graduation pathways that are intended to support struggling students, such as credit recovery and summer school. Although there was not full compliance with its policies, it is clear that DCPS has implemented – and is in the process of implementing – more internal controls. These internal controls include processes to notify students and families when attendance may impact passing a course as well as standardized systems to assist with greater school-level compliance with stated attendance and graduation policies, including the automation of policy enforcement within the DCPS student information system.

In addition to the areas identified by DCPS for continued improvement, OSSE recommends additional attention in the following areas:

- **Clarify the Application of Attendance Policy to Competency-Based Courses:** Although competency-based courses do not require, by design, specific seat-hour requirements to be met, the unexcused attendance records of students in the sample varied widely. OSSE encourages DCPS to clarify for teachers and students expectations regarding class attendance, instructions for recording class attendance in a course when attendance requirements vary, and whether unexcused absences (or other attendance-based criteria) may impact competency-based course grading and credit.
- **Strengthen the Appeals Process:** Three students had appeals documents in the sample. Although the sample was small, there was a wide range of quality among the three appeals. DCPS is encouraged to provide additional guidance to school-based Appeals Panels and school principals regarding documentation required to substantiate an appeal and ensure that any final administrative decisions issue on appeal clearly specify what steps must be taken as the result of a successful appeal.

## Conclusion

The findings from the investigation into graduation and attendance at DCPS in January 2018 were deeply concerning, and OSSE expects full compliance with the policies put in place to address them. OSSE is pleased with the progress DCPS has made since the investigation into graduation and attendance and

will continue to use its monitoring efforts to review and report on DCPS' progress toward full compliance with its own graduation and attendance policies.