

## EXECUTIVE SUMMARY

### Response to the Department of Education (DOE) Letter Regarding ESEA Flexibility Request District of Columbia Office of the State Superintendent of Education (DC OSSE)

May 17, 2012

*Note: DC OSSE Responses are italicized.*

#### **PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS**

Please address concerns regarding completeness of the high quality plan to transition to and implement college- and career-ready standards, particularly for teachers of students with disabilities, English Learners, and low-achieving students. See 1.B.

- *DC OSSE has engaged in a comprehensive professional development model to support access to the common core standards for students with disabilities and to ensure that instruction and assessment for this population is rigorous and relevant. DC OSSE collaborated with nationally recognized experts on differentiation and curriculum mapping, conducted a special education quality review project and updated our Special Education Data System (SEDS) to ensure that Individualized Education Plan (IEP) goals are aligned with Common Core State Standards (CCSS) and are standards-driven.*
- *For teachers of English Language Learners (ELLs), a series of professional development opportunities will be expanded this summer to offer practical training on strategies for making content area instruction comprehensible and meaningful for ELLs in grades 2-12. Furthermore, the District of Columbia's participation in the Assessment Services Supporting ELLs through Technology System (ASSETS) consortium gives the state access to new, research-supported assessment tools while exposing our teachers to the new English Language Proficiency (ELP) standards, resource guides, online training, and support in synchronizing students English language development with their academic achievement.*
- *DC OSSE will increase the availability of professional development opportunities and technical assistance to LEAs and schools in supporting the transition and implementation of CCSS to address the needs of low-performing students.*
- *DC OSSE will integrate the ED ESEA Flexibility FAQ Addendum #4 to ensure it meets with federal requirements regarding charter school transition and implementation of CCSS.*

Provide additional information within the transition plan on steps DC OSSE will take to ensure English Learners and students with disabilities have access to college- and career-ready standards and aligned instructional materials, including addressing the needs of students with disabilities who are enrolled in the general curriculum and take the general assessment. See 1.B.

- *In addition to standards-based alignment to inform development and execution of the IEP for students with disabilities, DC OSSE will conduct quarterly monitoring of secondary*

*transition requirements and notify LEAs of the findings of each review and the need to correct identified noncompliance no later than one year from identification; provide comprehensive training programs and continuous support through leadership of a State Secondary Transition Community of Practice; and will work with the Department on Disabilities Services (DDS) and the Rehabilitative Services Administration (RSA) to support the transition of secondary students with disabilities.*

- *DC OSSE has signed an MOU with the World-Class Instructional Design and Assessment (WIDA) to be part of the consortium to align the language assessments to the CCSS. Being a part of the WIDA Consortium allows our teachers access to the new ELP standards, resource guides, online trainings, and support in synchronizing student English language development with their academic achievement. We are also involved with, ASSETS, a four year project (beginning 2012) to build a comprehensive and balanced technology- based assessment system for ELLs. The assessment system will be anchored in WIDA’s ELP standards that are aligned with the CCSS and informed by current and ongoing research and supported by comprehensive professional development.*
- *DC OSSE also currently monitors LEA transition plans for English Learners as part of its review of Title III grants, specifically the district's method and procedures for transitioning and/or exiting students from its ELL program, and for monitoring their success afterward.*

## **PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT**

Please provide additional information and clarification in response to concerns regarding the school accountability system, particularly the use of the values table, including:

- Business rules for using data from the values table to assign points to schools and to differentiate the categories of schools (e.g. how the results from subgroups of students are incorporated into the overall school score, how schools are identified based on the scores and graduation rates). See 2.A.i.
  - *DC OSSE’s proposed accountability system rewards both growth and proficiency. This index will better enable DC OSSE to identify high-performing, high-progress, and struggling schools.*
  - *Our four-step methodology will create individual student scores based on both proficiency and growth; subgroup scores by subject; school-level subject scores; and an averaged school score.*
  - *This school-level index will classify schools into five categories: Reward, Rising, Developing, Focus, and Priority.*
    - *Schools that have not achieved a graduation rate of 60 percent for two consecutive years will be classified as priority schools;*
    - *Schools that have a DC CAS test participation rate of less than 95% for all students will also be classified as priority schools; and*

- *Schools that have a DC CAS test participation rate of less than 95% for subgroups will be classified as focus schools.*
- How graduation rate targets will be used within accountability system. See 2.A.i.
  - *Per federal guidelines, schools that have not achieved a graduation rate of 60 percent for two consecutive years will be classified as priority schools. For 2012, DC OSSE will use the leaver rate method for 2010 and the adjusted cohort graduation rate method for 2011. In future years, DC OSSE will only use the adjusted cohort graduation rate method.*
- How the system accounts for student subgroups and measures subgroup progress over time. See 2.A.i.
  - *To meet federal reporting requirements, DC OSSE will report an index score on all subgroups (for example, male and female students) but only use subgroups required by ESEA for accountability purposes and to categorize schools. DC OSSE will set Annual Measurable Objectives (AMOs) for subgroups, and subgroup scores will be part of the index.*
- Clarify the "n" size that will be used for accountability. See 2.A.i.
  - *Consistent with current practice, DC OSSE will continue to set the minimum subgroup N size for accountability at 25 and continue to report on minimum subgroup N size at 10.*
- Clarify the timeline, methodology and impact on the accountability system of including new assessments in the system with the rationale for weighting them at half the value of the ELA/Mathematics assessments. See 2.A.i.
  - *To ensure there is balance in the use of proficiency and growth by subject in accountability determinations, DC OSSE will use DC CAS Science and Composition results for accountability purposes at half the rate of the English/Language Arts and Mathematics assessments. While English/Language Arts and Mathematics are assessed in seven grade levels, science and composition are only assessed in three grade levels.*

Please indicate how test participation will be included in the accountability system to maintain strong accountability for assessing all students. See 2.A.i.

- *Based on federal accountability requirements, schools with DC CAS test participation rate of less than 95% for the "all students" group will be classified as priority schools. Schools that have a DC CAS test participation rate of less than 95% for subgroups will be classified as focus schools.*

Please address concerns regarding the calculation and reporting of separate ELA and Mathematics AMOs including how AMOs will be set at the State, district and school levels and how they will be incorporated into the accountability system. See 2.B.

- *DC OSSE will set AMOs for the “all students” category within a school and for each ESEA subgroup with the goal of reducing the gap by half over six years. In addition to school-level and subgroup AMOs, DC OSSE will also calculate AMOs for each LEA, as well as at the state level.*
- *The proficiency AMO is set at each level with the goal of, within six years, reducing by half the number of students who are not proficient. The graduation AMO is set to achieve a four-year graduation rate of 70 percent by 2017, which would require an annual improvement of four percentage points over the next five years. AMOs provide a high level picture of proficiency by subgroup in English/Language Arts, Mathematics, and the overall graduation rate. AMOs are reported by subgroup and annual reporting will describe whether schools have met each individual AMO. The measurement against AMO does not determine the classification of a student – however the same underlying data (graduation rate and DC CAS test scores including proficiency) are combined in a way that includes annual growth to produce an overall classification.*

Please demonstrate that DC OSSE's list of reward, priority, and focus schools meets the definitions in ESEA Flexibility. See 2.C.i., 2.D.i., 2.E.i.

- *The definition of reward, priority, and focus schools directly speaks to the ESEA requirements and also includes clarification that indicates minimum thresholds to determine school categorization. DC OSSE has proposed a range of cut scores to determine the appropriate category for each school under its differentiated recognition, accountability, and support system. The proposed cut scores were established at levels that ensure that the categories for reward, priority, and focus schools meet the required definitions for performance and progress under ESEA Flexibility. These cut scores will be revisited annually and adjusted over time to ensure that the categories continue to reflect reward schools as the top 10% of schools, identify at least 5% of the lowest-performing Title I schools as priority schools, and at least 10% of the lowest-performing Title I schools as focus schools based on student growth and performance.*
  - **Reward School:** *A school will be identified as a reward school if it demonstrates proficiency and growth for all students, as indicated by an overall proficiency/growth index score above 80, and has achievement gaps below the state average across all subgroups. Schools with an overall index score over 80 represent the highest performance and progress while limiting or closing achievement gaps. DC OSSE will calculate a school’s achievement gap using the lowest and highest subgroup index. For reward schools, DC OSSE did not initially differentiate between highest-performing and high-progress schools as required by ESEA. DC OSSE will begin designating high-progress schools, particularly for rewards and recognition, beginning in June with the use of the 2012 DC CAS.*
  - **Priority School:** *Schools with an overall index score under 25 represent the lowest performing schools based on student growth and performance, and include schools previously identified as persistently lowest achieving that have not shown growth. Stakeholder groups were insistent that DC OSSE identify more than the*

*minimum number of schools for support to ensure broader impact and sustained progress.*

- **Focus School:** *A school will be identified as a focus school if its proficiency and growth index score is between 25 and 34 or if its graduation rate is less than 60% for only one year. Schools with an overall index score between 25 and 34 represent the next tier of low-performing schools based on student growth and performance. DC OSSE’s accountability system averages together all subgroups regardless of size to ensure that every subgroup has a significant impact on the overall score. In particular, the historically lowest performing subgroups (special education and ELL) have equal weighting to ensure that there is continued emphasis on the performance of those subgroups and the narrowing of achievement gaps.*
- *To meet federal requirements, DC OSSE revised graduation criteria from schools with the lowest 10% of graduation rates to schools with graduation rates lower than 60% (two consecutive years for priority schools, only one year for focus schools).*

Please confirm that Title I funds will not be used in any non-Title I schools identified as reward schools. See 2.C.i.

- *Title I funds will not be used in non-Title I schools. Out of 54 LEAs, 10 (19%) do not receive Title I funds and out of 225 schools (traditional public and public charter schools), 25 (11%) do not receive Title I funds.*

Please demonstrate that the exit criteria for priority schools are rigorous and will result in significant progress in improving student achievement and narrowing achievement gaps. See 2.D.

- *In order to exit priority status, schools must demonstrate significant progress in improving student achievement and narrowing achievement gaps by exceeding the targets for the following criteria:*
  - *Overall School Index: Exceed the cut score to be identified in priority status for three consecutive years;*
  - *Graduation Rate: Exceed 60% for three consecutive years; and*
  - *DC CAS Test Participation: Meet or exceed 95% participation for the “all students” subgroup for three consecutive years.*

Please address concerns related to the proposed intervention and support strategies, including by:

- Clarifying that DC OSSE will ensure all LEAs with one or more priority schools will implement meaningful interventions aligned with all of the turnaround principles simultaneously in each priority school, for at least three years. See 2.D.iv.
  - *DC OSSE will employ a Cross-Functional Team (CFT) staffed by school experts to ensure simultaneous and effective implementation of meaningful interventions*

*aligned with all the Turnaround Principles in each priority school for at least three years. The interventions include: strong principal leadership; effective staffing practices and instruction; curriculum, assessments and interventions; effective use of time; effective use of data; school climate and culture; and effective family and community engagement. DC OSSE will provide training to enable the CFT to recognize an LEA's successes – both in terms of results in student learning and universal application of effective practice – and its deficiencies, enhancing the motivation for change.*

- *Resources developed by DC OSSE and used in priority school interventions will include: CCSS curriculum and assessments; professional development supporting improved instruction; data systems for improving teaching and learning; guidelines for identifying quality enhanced and extended learning opportunities; and innovative strategies to support special education students, ELLs and low-achieving students.*
- Describing how DC OSSE will ensure that the focus school interventions will address the needs of the subgroup(s) for which the school was identified as a focus school. See 2.E.iii.
  - *Specific interventions for various subgroups will be determined by the CFT, school leaders and the LEA. Effectiveness measures will be determined based on the interventions and will be required to include student achievement measures.*
  - *For all schools, the impact of the interventions will be regularly monitored by the Innovation & Improvement team in order to ensure that all schools are implementing interventions effectively and making progress towards increasing student achievement. The CFT will be in constant communication with the DC OSSE leadership in order to ensure that the agency is continually designing and providing the resources and guidance most effective to drive school improvement.*
- Addressing the concerns that the accountability system does not include interventions specifically focused on students with disabilities or English Learners. See 2.D.iii.b, 2.E.iii.
  - *DC OSSE holds LEAs accountable for performance related to students with disabilities via an annual IDEA Part B LEA determination process, as required by IDEA. DC OSSE also reports to the public on LEA performance related to the federal compliance indicators established by the USDE Office of Special Education Programs. Beginning in FY 12, DC OSSE will also be issuing LEA-level performance snapshots on IDEA compliance and results indicators. DC OSSE anticipates integrating select indicators into its accountability framework in future years, with public input from special education stakeholders.*
  - *The specific interventions will be determined by the CFT, school leaders, and the LEA. Effectiveness measures will be determined based in part on the use of quality review/assessment tools specifically created to guide decision making to determine appropriate interventions requiring student achievement measures be used as performance indicators.*

- *Focus schools that are identified as not meeting the needs of students with disabilities will be required to implement:*
  - *Curriculum aligned to CCSS;*
  - *Collaborative teaching model;*
  - *Improved use of data for differentiating instruction;*
  - *Professional development for special education teachers to better understand the rigor of the CCSS; and*
  - *Professional development for all teachers to better meet the needs of students with disabilities.*
- *Focus Schools identified as not meeting the needs of ELLs will be required to implement:*
  - *Research-based strategies for teaching academic English;*
  - *Strategies to improve the use of native language support;*
  - *Strategies to scaffold learning to meet the rigorous requirements of CCSS;*
  - *Professional development for all teachers to learn strategies for meeting the content learning needs of ELLs; and*
  - *Professional development for teachers supporting ELLs to better understand the rigorous requirements of the CCSS.*

Please demonstrate that a school may not exit focus status without making significant progress in improving student achievement and narrowing achievement gaps for the subgroup(s) of students for which the school was identified. See 2.E.iv.

- *A school can become eligible for exiting focus status if it:*
  - *No longer meets the definition of a focus school for two consecutive years;*
  - *Graduation Rate – Exceeds 60% graduation in one or more years;*
  - *Index – Exceeds the focus school cut score for one or more years;*
  - *DC CAS Test Participation – Meets or exceeds 95% participation for the subgroup leading to the initial identification for one or more years; and*
  - *Has, as determined by the CFT, successfully implemented all interventions required through its Indi-star.*
    - *If identified as successful, its lowest performing subgroups have met their annual measurable objectives for three years; and/or has demonstrated high growth for two consecutive years as measured by Student Growth Proficiency.*

Describe the steps DC OSSE will take to ensure meaningful consequences for priority and focus schools that do not make progress after full implementation of interventions. See 2.D.iii.b, 2. E. iv.

- *The role of the CFT in ensuring that schools make significant progress in improving achievement and narrowing achievement gaps will consist of:*
  - *Intensive monitoring from 2 times a year to a minimum of 4 times a year;*
  - *Prescription of the use of Title I funds;*

- *Realignment of other federal resources; and/or*
- *Prescriptive use of other federal resources, as necessary.*
- *DC OSSE will also recommend that priority schools re-identified after 3 years of being in priority status to be considered for closure.*

Please demonstrate that DC OSSE's proposed accountability system provides incentives and supports for other Title I schools that are based on its AMOs in ELA/Mathematics and other measures. See 2.F.

- *As part of its Title I grant application, LEAs with schools that do not meet their AMOs must describe how the LEA will assess the district's implementation of indicators of effective practice; select priority objectives aligned to those indicators; plan action steps to address deficiencies related to those objectives; implement those action steps; and evaluate progress.*
- *Specifically, implementation activities to address deficiencies in school-based practices may include: supplemental research-based and job-embedded professional development; supplemental instruction to school-selected students provided by external providers, schools, or LEAs; any activity that is required within one of the SIG intervention models for priority schools, or any other activity that is specifically required by an action step included in the plan in support of an objective included by the leadership team.*

Please address concerns regarding insufficient plans to build and monitor LEA capacity to support effective implementation of interventions in priority schools, focus schools, and other Title I schools. See 2.G.i.

- *The Innovation & Improvement team uses the CFT to assess and build LEA capacity, which allows DC OSSE to identify LEAs' areas of weakness in operations, instruction and program, governance, personnel, and fiscal management. The process reveals where LEAs should focus, and can lead to severe interventions in cases where results are particularly troubling and no progress is being made. DC OSSE will:*
  - *Differentiate supports through its CFT based on LEA and school needs*
  - *Provide professional development and technical assistance to ensure effective transition and implementation of CCSS*
  - *Align assessments to CCSS and provide results to LEAs and schools based on standards to inform instruction*
  - *Assist LEAs implement effective teacher and leader evaluation systems*
  - *Publish reports on LEA and school data*

Please describe whether DC OSSE will leverage funds that LEAs were previously required to reserve under ESEA section 1116 to support the implementation of interventions in priority, focus, and other Title I schools identified under DC OSSE's differentiated recognition, accountability, and support system. See 2.G.ii.



- *DC OSSE will require all LEAs that do not meet AMOs to continue to reserve 20% of Title I funds and submit a plan as part of their Title I grant application describing LEA determined interventions to meet student and school needs.*
- *DC OSSE will monitor implementation and progress 2 times a year.*
- *If AMO targets are met, remaining funds from the 20% reserved will be released for LEA discretionary use for Title I purpose.*
- *If AMO targets are not met, DC OSSE, through its CFT will make recommendations for prescribing use of Title I funds and will intensify monitoring to a minimum of 4 times a year.*
- *Remaining funds for LEAs that do not meet AMO targets will be carried over the following year for prescriptive use made by the CFT to be used in conjunction with the new 20% Title I reservation.*

Describe how DC OSSE will hold LEAs, not just schools, accountable for improving school and student performance. See 2.G.iii.

- *In addition to the use of Title I funds as described above, DC OSSE will hold LEAs accountable for the performance of their schools through an annual school performance report that is made available to the public. Each school will be compared to all schools in the District of Columbia, as well as to schools with similar student demographics. The report will provide demographic information as well as financial data. LEAs with underperforming schools will be required to submit improvement plans and repurpose Title I funds.*
- *DC OSSE will integrate the ED ESEA Flexibility FAQ Addendum #4 to ensure it meets with federal requirements regarding charter school accountability.*

### **PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP**

Provide more clarity on the process for developing and adopting guidelines that is likely to result in successful adoption of those guidelines by the end of the 2011-12 school year. See 3.A.ii.

- *To have the guidelines in place by June 30, 2012, DC OSSE will take the following steps:*
  - *Step 1: DC OSSE will revise the RTTT guidelines to meet the Department of Education's requirements.*
  - *Step 2: Title I Committee of Practitioners and the Human Capital Task Force will review and comment on the guidelines on May 24, 2012.*
  - *Step 3: DC OSSE will hold a conference call with LEA leaders on May 25, 2012 to get feedback by June 1, 2012 on the guidelines.*
  - *Step 4: DC OSSE will revise guidelines and send to LEAs by June 8, 2012 for final comments by June 15, 2012.*
  - *Step 5: DC OSSE will finalize the guidelines and submit to the Department of Education by June 22, 2012.*

Provide a plan to ensure high-quality and consistent implementation of DC OSSE's teacher and principal evaluation and support systems, including specific process for implementation and how that implementation will occur across all LEAs. See 3.B.

- *DC OSSE developed a plan identifying specific milestones, responsible parties and resource allocations, to ensure high-quality and consistent implementation of teacher and leader evaluation and support systems across all LEAs by school year 2014-2015.*
- *In May 2012 – DC OSSE began implementing the plan with a revision of the current RTTT guidelines for leader and teacher evaluations to meet the Department of Education's ESEA Flexibility guidelines.*
- *In June 2012, the taskforces will begin soliciting feedback for the revised requirements for local evaluation systems, which they plan to complete by July 2012.*
- *DC OSSE will conduct training between October and November 2012, and its goal is to roll out the new requirements for full implementation by RTTT LEAs and pilot implementation for Title I LEAs by December 2012.*

Please explain how DC OSSE plans to work with teachers and administrators or, as appropriate, their designated representatives, in order to implement the evaluation and support plans outlines in the request. See 3.B.

- *Beginning in the 2012-13 school year, the Human Capital Task Force will be expanded to include non-RTTT LEA representatives. DC OSSE will also create two new advisory groups—a group of teachers and a group of leaders from both public charter and District of Columbia Public Schools (DCPS)—that will provide input on the evaluation requirements and development of Teacher, Leader, and Professional Development standards.*

Please describe how DC OSSE will ensure that LEAs create teacher and principal evaluation and support systems that include as a significant factor data on student growth for all students, consistent with the definition for student growth in ESEA Flexibility. See 3.B.

- *DC OSSE's Race to the Top grant requires that school leader evaluations include student growth to a significant extent and that teacher evaluations include student growth as 50 percent of the evaluation rating for teachers in English/Language Arts and Mathematics in grades 4-8.*
- *Similar to our requirements for school leader evaluations within RTTT, DC OSSE will require that LEAs demonstrate that student growth and achievement account for a significant proportion of a teacher and principal's rating.*
- *DC OSSE will integrate the ED ESEA Flexibility FAQ Addendum #4 to ensure it meets with federal requirements regarding charter school teacher and leader evaluation systems.*