TO: Superintendent Hanseul Kang  
CC: Shana Young  
FR: Ruth Wattenberg, Chair SBOE Committee on ESSA, on behalf of the SBOE  
RE: SBOE Recommendations for the Improvement of the ESSA proposal

Thanks to you and your staff for all of the work done on behalf of this proposal to date. Below are the consensus recommendations of the State Board of Education. They are consistent with suggestions that board members have made and concerns they have raised in various meetings and with many of the comments that we have heard at meetings. These changes include both immediate interim changes as well as parameters for and a research/engagement process leading to additional changes in year 2 and beyond. Below are our ten recommended changes, followed by more detail on the proposed task forces and an appendix offering a framework for an index on Well-Rounded Education.

Needed Improvements in ESSA proposal

1. **Change the weight and composition of testing/non-testing factors in two steps, first with the addition of interim measures of a well-rounded education in year 1 (SY2017-18, with the rating issued in fall 2018) and second, with the addition of new climate measures in year 2.** We are committed to expanding the weight of non-test factors in K-8 to at least 30 points within two years, with at least 10 points going to new measures of school climate (especially through a survey) and 10 points going to measures intended to recognize and incentivize attention to a broad, engaging, well-rounded school program, as set forth in DC state standards. In year 1, as noted below, 10 points go to an interim Well-Rounded Education measure.  
   (NOTE: In year 2, some of the points for the new climate and Well-Rounded Education measures may come from points now allocated to attendance and re-enrollment.)

2. **It is necessary to identify appropriate accountability indicators and weights based on important elements of school quality.** We are committed to identifying the key elements of school quality for which we believe schools should be held accountable and identifying indicators that can reasonably measure these elements with minimal unintended consequences. We are not satisfied with defining the measures of school accountability based on the measures that happen to exist now.

3. **Establish Task Forces on Climate/Well-Rounded Education and High School Growth Measures; and conduct a study of testing in DC schools.** We recognize that further research and further engagement of stakeholders are necessary to identify these measures and put them into place. We ask that, as described below, two bi-sector, multi-stakeholder working groups, co-chaired by OSSE and SBOE (one on climate and a well-rounded education; and one on high school growth), be convened and tasked with this work. In addition, OSSE and SBOE should jointly oversee a research study on the effect of current testing practices on instructional time and curriculum narrowing as well as DC examples of best practice. The task force shall have a deadline for bringing its final proposals back to the
State Board of Education by April 2018 for a vote. At that time, the SBOE will also be given the option of increasing the total weight of these and other existing climate indicators (attendance and reenrollment) to at least 35% for Year 2 and beyond. The Task Force shall bring its recommendations for interim Well-Rounded Education measures to the State Board for a vote in summer 2017.

4. **Immediate, interim measures.** In the interim, for the Year 1 rating (issued in fall 2018, evaluating school year 2017-18):
   a. Include an interim high school growth measure, to count for at least one-third to one-half of the high school testing measure. Possibilities include using growth on the PARCC ELA from 8th to 10th grade, growth from beginning-of-year to end-of-year growth, using existing, in-use diagnostic tests, or using other assessments.
   b. Include an interim 10-point measure of a Well-Rounded Education that starts us on a path to recognizing and incentivizing the importance of a well-rounded education. For a strong example, see the attached appendix, “Well-Rounded Education Index.” This could also include publishing, transparently, along with the fall 2018 ratings, elementary school schedules showing the time devoted to specific subjects.

5. **Increased weight on growth.** We are committed to placing substantially greater weight on growth than on proficiency. Our recommendation is minimally, to change the ratio of proficiency to growth from 50/50 to at least 40/60 or even 35/65. Anything less than that seems to run the risk of rating a low-proficiency/high growth school with a rating that underrepresents the actual growth it has brought about. If simulations indicate that the rating of individual schools doesn’t change by virtue of shifting the weights, it nonetheless makes sense to change the weights in order to assure that any future growth will be clearly captured and recognized in the summative score.

An alternative option is to use a dashboard system—in which levels of growth, proficiency, and climate/well-rounded are reported separately and transparently—and not issue a single summative score. Under such a system, care needs to be taken to assure that parents can easily understand this dashboard.

6. **Replacing PARCC scores with ACCESS growth scores.** Regular standardized test scores (PARCC) should not count for ELL students until the last year allowed by federal law. ELL students should not be required to take the test until after their first year (which seems to be current practice). Instead, growth on ACCESS should replace all or most of these students’ PARCC proficiency and growth scores.

7. **Exempting students with severe impairments from taking the regular standardized assessment (PARCC).** Insofar as is possible under federal law, we should do everything possible to make sure that students identified with severe cognitive impediments are not required by this policy to take the PARCC tests; individual schools can choose a policy that makes sense for their students.
8. **Disaggregation of economically disadvantaged students.** Insofar as it is required by law to disaggregate indicators according to economic disadvantage, PARCC scores and other indicators for this classification shall be disaggregated based on TANF/SNAP (either together or separately), using already-collected data. In addition, if these two sets of scores are aggregated to represent “economically disadvantaged” students for the federal requirement, they must be disaggregated by each of these categories in the reporting of accountability scores/ratings.

9. **Regular review and audit of all accountability measures.** A recurring theme at meetings has been the way in which the proposed measures (and others as well) can be—or already are—manipulated. This concern is not just a DC concern: A growing number of articles in the education press (and most recently in the *Washington Post*) have raised the concern that rising graduation rates across the country are a result not of increased achievement, but of policy changes made in light of the new federal requirement on graduation rates in order to make graduation easier. There is likely nothing that can be done to eliminate all manipulation of all the accountability metrics. But, having more such metrics, which somewhat lowers the valence of each, may be helpful. And, it all needs to be reasonably monitored and audited. The message around this system should be that we at the state-level want to play fair—and are working hard to make the metrics fair and reasonable—and we expect the institutions and individuals in them to do everything possible to play fair as well.

10. **Review of the new system.** With the task forces named above leading to a more urgent revision of several key indicators on a shorter timeline, we concur with OSSE that an overall review of the accountability system can and should take place in 2018-19. A joint OSSE/SBOE task force should be charged with that review. Among the issues that should be considered at that time, if not before, are strong measures for career and technical education in high school and the inclusion of scores from science tests.
Task Forces and Research

A. Task Force on School Climate and Well-Rounded Education
The goal of this bi-sector, multi-stakeholder task force shall be to a) identify measures of school climate, especially using surveys of students, teachers, and parents; and of well rounded education that can be incorporated into the accountability rating no later than in Year 2 of the new system (meaning SY2018-19, with a rating report in fall 2019) for at least ten points each; and, b) recommend interim Well-Rounded Education indicators for Year 1. In order to recommend Well-Rounded Education indicators for use Year 1, this task force should be convened in spring/summer 2017.

This Task Force will at minimum:

1. Review the existing research on school climate surveys; inventory the surveys currently used by DC schools to survey students, teachers, and parents; learn from the work of these schools and OSSE’s new and existing pilots on climate surveys; to identify one or more climate surveys, or an approach to a climate survey(s) that could be used across all DC schools to measure school climate; review the experiences of pilots; and consider other approaches to measuring school climate, including through the use of indicators such as teacher retention and student discipline data.

2. Review what practices best support a well-rounded education in DC schools; consider existing artifacts that could help constitute a measurement of Well-Rounded Education, as, for example, put forward in the attached Well-Rounded Education Index; review relevant research and if and how other states are proposing to measure and incentivize well-rounded education; consider how to make the measures as robust as possible, including the possibility of audits/inspections or other processes to help strengthen quality implementation; identify Well-Rounded Education indicators for use in Year 2 and beyond; and, early in the process, review proposed Well-Rounded Education interim indicators for use in Year 1. Well-Rounded Education is defined as including a curriculum rich in science, social studies, and the arts; formal school-wide programs such as the International Baccalaureate and dual language immersion; career training programs, programs that engage and involve students as citizens and active learners and use the city as a classroom, especially when certified for quality; and compliance with legal requirements of the Healthy Schools Act, including adequate PE and health education. (See attached Well-Rounded Education Index as a good example.)

3. In its final recommendations, the Task Force shall recommend how to allocate at least 10 points each to Well-Rounded Education and new climate indicators, with a total of at least 30 points and perhaps more going to non-test factors at the K-8 level. In considering its recommendations for the final weights of climate and a well-rounded education, the committee can consider diminishing the weight currently given to attendance and re-enrollment, thus allowing the committee to consider how a full 30 to 35 points should be used to measure and promote school climate and a well-rounded education.

4. The recommendations for interim Well-Rounded Education measures should be presented for a vote by the SBOE during summer 2017 to assure that schools are aware of the new measures as the school year begins. The recommendations for climate and Well-
Rounded Education indicators for Year 2 should be presented for a vote by the SBOE in April 2018.

B. Task Force on High School Growth Measure
The goal of this bi-sector, multi-stakeholder group shall be to recommend how high school growth should be measured starting in Year 2 of the accountability plan. Among the options that should be considered are: maintaining our current testing regime and using a growth measure between 8th and 10th grade PARCC scores; switching the current PARCC tests to 9th grade, so a growth measure can be taken from 8th to 9th grades; switching to another set of high school tests, for example the PSAT and SAT; using beginning of year diagnostic tests as the basis for measuring end-of-year growth measures; and other options.

As this choice could require substantial shifts to which tests we use and when we give them, both of which could require substantial lead time to implement, this task force must begin its work quickly and issue its report by February 2018, with the hope of having the new high school testing and measurement regime in place for school year 2018-19 (Year 2) and the new growth measure in place for the report on that year, issued in fall 2019.

C. A Review and Audit of Testing Practices
This review will analyze the possible effect of testing on instructional time, school climate, and curriculum narrowing (as allowed for and encouraged under ESSA and as requested by the SBOE in 2015). Examples of best practices around well-rounded education in DC schools should be undertaken immediately in order to inform the work and recommendations of the task forces and the decisions of OSSE and the SBOE.
Appendix: Well Rounded Education Index

**Well-Rounded Education Index**

Background notes: The Well-Rounded Education Index would provide 14% of the accountability metrics for elementary and middle schools. This 14% can be made available by reducing the Academic Achievement from 40% to 26% as supported by community testimony. This would reduce the ELA/Math PARCC Level 4+ from 12.5% to 10% each and the ELA/Math PARCC Level 3+ from 7.5% each to 4% each. At the end of each semester, schools would complete a survey and submit supporting artifacts (e.g., sample schedules for each grade level, student work samples for civic readiness measures). Supporting evidence for this approach includes the research-supported rationale for on p.3, State Board of Education testimony from Cosby Hunt, the “Knowledge Matters ESSA Brief,” and “NCSS on SS and Well Rounded Education.”

**Required Indicators:** The five required indicators of the WRE Index count for 2% each, 10% of the overall accountability metrics.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
<th>Examples/Clarification</th>
<th>Does not meet standard</th>
<th>Floor</th>
<th>Target</th>
</tr>
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<tbody>
<tr>
<td>Social Studies Instructional Time</td>
<td>This indicator will measure the amount of instructional time provided for coherent/dedicated social studies instruction in alignment to the DC Social Studies standards.</td>
<td>The instructional time minimums provided in these two indicators must be in addition to any time that might be spent during literacy blocks or other times when social studies or science content may be incidentally addressed. Instructional time should be in alignment to the best practices of the disciplines of science and social studies.</td>
<td>Students receive less than 5400 minutes/year (avg. 30 minutes/day) of instruction dedicated to social studies in alignment to the DC Social Studies standards.</td>
<td>Students receive at least 5400 minutes/year (avg. 30 minutes/day) of instruction dedicated to social studies in alignment to the DC Social Studies standards.</td>
<td>Students receive at least 7200 minutes/year (avg. 40 minutes/day) of instruction dedicated to social studies in alignment to the DC Social Studies standards.</td>
</tr>
<tr>
<td>Science Instructional Time</td>
<td>This indicator will measure the amount of instructional time provided for coherent/dedicated science instruction in alignment to the Next Generation Science standards.</td>
<td></td>
<td>Students receive less than 5400 minutes/year (avg. 30 minutes/day) of instruction dedicated to science in alignment to the Next Generation Science standards.</td>
<td>Students receive at least 5400 minutes/year (avg. 30 minutes/day) of instruction dedicated to science in alignment to the Next Generation Science standards.</td>
<td>Students receive at least 7200 minutes/year (avg. 40 minutes/day) of instruction dedicated to science in alignment to the Next Generation Science standards.</td>
</tr>
<tr>
<td>Arts Instructional Time</td>
<td>This indicator will measure the average amount of daily instructional time provided for coherent/dedicated music, art, drama, and/or dance instruction in alignment to the relevant DC state standards.</td>
<td>The instructional time minimums provided in these two indicators must be in addition to any time that might be spent during recess, lunch or after school times. Instructional time should be in alignment to the best practices of the disciplines of the arts.</td>
<td>Students receive less than 3200 minutes/year (45 minutes/week) of dedicated instruction in music, art, drama, and/or dance.</td>
<td>Students receive less than 1600 minutes/year (45 minutes/week) of dedicated instruction in music, art, drama, and/or dance.</td>
<td>Students receive at least 3200 minutes/year (90 minutes/week) of dedicated instruction in music, art, drama, and/or dance.</td>
</tr>
<tr>
<td>Physical Education/Health Instructional Time</td>
<td>This indicator will measure the average amount of daily instructional time provided for coherent/dedicated music, art, health, physical education, world languages, and/or library/media/technology instruction in alignment to the relevant DC state standards.</td>
<td></td>
<td>Students receive less than 3200 minutes/year (45 minutes/week) of dedicated instruction in Health and Physical Education.</td>
<td>Students receive less than 1600 minutes/year (45 minutes/week) of dedicated instruction in Health and Physical Education.</td>
<td>Students receive at least 3200 minutes/year (90 minutes/week) of dedicated instruction in Health and Physical Education.</td>
</tr>
<tr>
<td>Civic Readiness</td>
<td>This indicator will measure participation in educational activities that actively engage students in the content, skill, and dispositions required for citizenship in a democracy. Including, but not limited to: National History Day, Model UN, We the People, the National Geography Bee, Project Soapbox, community service, Science Fair,</td>
<td>50% or fewer students participate in least one civic readiness activity in each subject area (i.e., social)</td>
<td>Students receive less than 5400 minutes/year (45 minutes/week)</td>
<td>Students receive 51%–75% of students participate in least one civic readiness activity in each subject area (i.e., social)</td>
<td>Students receive 76%–100% of students participate in least one civic readiness activity in each subject area (i.e., social)</td>
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Rationale for Well-Rounded Education Index:

- **Time for social studies and science is a civil rights issue:** Since 2001 when NCLB was approved, schools have increasingly seen a narrowing of curriculum, with subjects like science, social studies, and the arts receiving considerably less time and focus, particularly in elementary grades. Higher income students have significantly more background content knowledge by the time they start school compared to students from low-income backgrounds. This discrepancy creates an inequitable opportunity gap for students that limits their success in school, careers, and their ability to participate as citizens in our democracy. The proposed revisions will help to close the achievement gap in Washington, DC and address this inequity.

- **Well-rounded education meets ESSA’s intentions:** Secretary King spoke many times during the initial phase of ESSA implementation about the great potential for the law to allow for a more well-rounded education that goes beyond reading and math to include civics, economics, geography, history, science, and the arts. By reducing the focus on Math and English testing, the proposed revisions can send a strong signal to school leaders and the community that DC embraces this approach. Among draft state plans, Louisiana has proposed an “Interests and Opportunities index” which might provide ideas for inclusion in our plan.

- **Community supports inclusion of these elements:** DC State Board of Education members and leaders of three education community advocacy organizations® have reported strong community feedback for measures like those proposed by this document, along with a lot of support for a school climate survey as well.

- **Content knowledge and skills support literacy:** While the DCPS ELA/Literacy curriculum includes content-based unit themes, more specific time dedicated to standard-based instruction would more meaningfully build content knowledge and disciplinary literacy skills that support student success in literacy. Research suggests that as students move into reading that requires more in-depth content knowledge, the role of deep understanding of this content plays an increasingly important role in their ability to make sense of complex text. For example, for grades 6-8 students in DCPS, student success on the Social studies Assessment of Growth and Excellence (SAGE) strongly correlate with success on the ELA PARCC Assessment. Students spending more time on social studies, science, and the arts can lead to improvements in literacy as well.

- **Historical thinking skills are increasingly necessary due to “fake news”:** During the recent presidential campaign, voters have increasingly been exposed to “fake news” designed by partisans or to drive traffic as click bait, especially as increasing numbers of people get their news primarily from social media. Recent research has shown that despite students being digital natives, the vast majority lack the skills to source, contextualize, and corroborate information. We must equip our students...
with the historical thinking and media literacy skills to be able to sort through misinformation so they can participate in our democracy as informed citizens.

- **Schools have a civic mission:** As described in the DCPS Way: Social Studies document, we believe in the civic mission of public education in the United States that created compulsory schooling to ensure an informed citizenry necessary to sustain our government as a democratic republic. Making explicit the need for time for social studies instruction in grades K-8 more directly supports this mission. Last year, Secretary of Education John King taught a 12th-grade U.S. Government class at Coolidge High School to help make this point and gave speeches at the National Press Club and a keynote address at the 2016 National Council for the Social Studies arguing for “the importance of civic education as part of a well-rounded education.”

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6 This finding was reported by Suzanne Wells, Capitol Hill Public School Parents Organization (CHPSPO), Cathy Reilly, Senior High Alliance of Parents, Principals, and Educators (S.H.A.P.P.E.), and Gary Ratner, Citizens for Effective Schools.

7 For students who scored at least 76% on the SAGE, 98% scored a 4 or 5 on the ELA PARCC and for students who scored 51-75% on SAGE, 66% scored a 4 or 5 on the ELA PARCC.
