



April 1, 2021

Shana Young
Interim State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Interim Superintendent Young,

The D.C. State Board of Education appreciate the opportunity to review and provide comments on the District’s Every Student Succeeds Act (ESSA) Assessment and Accountability Waiver Request—to be submitted by the Office of the State Superintendent of Education (OSSE) in early April and reviewed by the U.S. Department of Education (USED)—which waives statewide assessment, accountability, and reporting requirements in the District for the 2020–21 academic year.

We applaud the lengths OSSE has gone in exploring options for waiving components of statewide assessment and accountability requirements under ESSA, while remaining steadfast in its commitment to work with stakeholders to identify alternative routes for collecting valid and reliable student data, sharing this data with the public, and providing meaningful supports to schools based on the data. In response to OSSE’s presentation and discussions regarding their proposed assessment and accountability waivers during the State Board’s March 25 special working session, we share the following comments:

- **Public Safety:** We appreciate OSSE’s concern for students’, parents’, and educators’ health and safety, while acting in good faith in exploring ways to administer a statewide assessment virtually. We agree that administering the Partnership for Assessment of Readiness for College and Careers (PARCC) and Multi-State Alternate Assessment (MSAA) in English language arts and mathematics, as well as the DC Science assessment, would prove to be challenging in collecting valid and reliable student performance data in a virtual posture. We are also in agreement with the logistical obstacles and inequitable nature of administering such statewide assessments virtually, including students’ difficulties with unreliable internet connections, issues with hardware and software, the need for specific accommodations, and logistical challenges for remote proctors.
- **Participation Requirements:** We agree that should any statewide assessment be administered, it is unlikely to receive a 95 percent participation rate, as required under ESSA. As OSSE shared in its reporting on Term 2 in-person learning participation figures, only 4 percent of students have been participating in some variation of a hybrid instruction model. Further, OSSE noted that based on current attendance trends and factoring in reopening for Term 4, only 30 percent of students would likely participate in any administration of a statewide assessment. With such a low number of likely participants, it



would be almost impossible to obtain useful and comparable data from the statewide assessment.

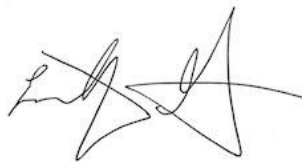
- **Report Card:** We appreciate and concur with OSSE's request for a waiver from requirements to calculate the School Transparency and Reporting (STAR) Framework scores and rating. We also look forward to OSSE updating the DC School Report Card website in fall 2021 with meaningful, timely, and relevant data.
- **Alternative Assessments:** We appreciate and support OSSE's commitment to continue in-person assessments like ACCESS and Alternative ACCESS that serve to identify English language learners who might need to enter, remain in, or exit specialized services and programs. We commend OSSE in its commitment and dedication to ensuring that the District's most vulnerable student populations are served during this time of greater need.

We value the collaborative partnership between OSSE and the State Board on this matter and will continue to support OSSE in communicating the waiver's importance with our constituents. We support the proposed waiver requests and hope they will be approved by USED swiftly.

Sincerely,



Zachary Parker, President & Ward 5 Representative



Emily Gasoi, Vice President & Ward 1 Representative

