



March 2, 2022

Christina Grant
State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Superintendent Grant,

The D.C. State Board of Education (SBOE) appreciates the opportunity to provide public comment on the Office of the State Superintendent of Education (OSSE) 2022 D.C. State Plan Accountability Addendum.

Pursuant to §38–2652(a)(7), the State Board has the approval authority over the state accountability plan for the District of Columbia developed by OSSE. The State Board appreciates OSSE’s ongoing engagement in both the statewide accountability amendment and addendum process.

OSSE’s proposed 2022 D.C. State Plan Accountability Addendum addresses many of the challenges related to measuring school performance during the last two years of the COVID-19 pandemic and the State Board appreciates many of the decisions that went into the addendum, including striving for valid metrics in the annual meaningful differentiation of schools, eliminating the STAR Rating in 2022, and extending the use of 1003 funds for SY2018–19 Comprehensive Support and Improvement Schools, type 1 (CS1). The State Board also recognizes the limitations in introducing new metrics to the accountability system in 2022, and appreciates OSSE striving to identify indicators that provide valid and equitable calculations. In addition, the State Board notes a few areas that would benefit from further clarity and changes. Those areas are summarized below in order of appearance in the proposed addendum.

Indicators

- OSSE should clarify how it intends to incorporate both 4- and 5-year Adjusted-Cohort Graduation Rates (ACGR)—and the extended year graduation metric—into the 2022 annual meaningful differentiation calculation. OSSE should further clarify how these metrics will be used in a “permanent revision” as stated under Indicators, Item 3.
- OSSE should further explain how it will use “in-seat attendance” metrics in 2022 as an indicator, considering families have continued to report familial health concerns and access barriers (i.e., access to digital devices and high-speed internet) for SY2021–22.





System of Annual Meaningful Differentiation

- The State Board understands the limitations of using past metrics in SY2021–22 . Under the Annual Meaningful Differentiation, Item 2, it states that “*OSSE proposed to calculate the meaningful differentiation using all available metrics...*”, the State Board requests OSSE provides a bulleted list of all available metrics for elementary/middle and high schools.
- Under the “Indicator Weights” table used to identify schools meeting the designation thresholds for additional supports (i.e., comprehensive and targeted support and improvement schools), please provide the full list of metrics and their points within each indicator category for elementary/middle and high schools.

School Improvement: Identification Timeline, Methodology, and Exit Criteria

- As growth metrics are not able to be used as a factor in SY2021–22 for annual meaningful differentiation of schools, it is more important than ever that OSSE provides a clear, concise explanation to the public on how schools were designated on the OSSE-designation website and any mention on the DC School Report Card.
- The State Board is pleased to see OSSE proposing the usage of leading indicators as part of exit criteria for schools identified for comprehensive support and improvement in fall 2022. For further clarity and transparency, please provide the list of leading indicators being considered. The State Board recommends the use of positive leading indicators (e.g., student classroom engagement, student/faculty feelings of safety, student course-taking patterns, etc.) over negative indicators (e.g., suspension and expulsion rates, educator disengagement, etc.). It is important to go beyond students’ presence at school and instead measure their engagement with it.

Lastly, the State Board recommends OSSE to provide transparency on how it plans to incorporate public comments into the addendum.

The State Board understands that OSSE is soliciting public comment on the D.C. State Plan Accountability Addendum through Wednesday, March 2, 2022, and is fully committed to working alongside you and your staff as these addendum requests are finalized.

Sincerely,

The D.C. State Board of Education

Jessica Sutter, President and Ward 6 Representative
 Eboni-Rose Thompsonm Vice President and Ward 7 Representative
 Emily Gasoi, Ward 1 Representative
 Ruth Wattenberg, Ward 3 Representative





Zachary Parker, Ward 5 Representative
Carlene Reid, Ward 8 Representative
Jacque Patterson, At-Large Representative

