



District of Columbia State Board of Education
DCSBOE



To: Members, State Board of Education

From: Ruth Wattenberg, Chair, ESEA Waiver Renewal Committee
Mary Lord, Committee Member

Subject: Recommendations on the Elementary and Secondary Education Act Waiver Renewal and Subsequent Amendments

Date: March 18, 2014

Executive Summary

One of the major responsibilities of state boards of education is to help develop and approve the statewide plan for holding schools accountable for educating all children equitably and excellently.

Since 2002, the federal Elementary and Secondary Education Act (ESEA) – better known as No Child Left Behind – has required states to administer standardized annual reading and mathematics tests to all students in grades 3 to 8 and at least once in high school to determine how well they have met state proficiency benchmarks. The law further specified that scores had to be reported for special-education and other subgroups of students, and that every child had to achieve proficiency by the end of the 2013-2014 school year, or schools would face sanctions.¹

As that statistically impossible benchmark loomed, threatening to brand most of the nation’s schools as “failing,” the U.S. Department of Education invited states to apply for waivers. In return for flexibility in meeting ESEA/NCLB mandates, states had to develop their own rigorous plans to hold schools accountable and to “improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction.”

Ultimately, 43 states and the District of Columbia received waivers for the 2012-2013 school year. Those waivers expired at the end of the 2013-2014 school year and the District applied for and received a one-year extension of an amended waiver through the current 2014-2015 school year.

With reauthorization of the ESEA stalled in Congress, the U.S. Department of Education has invited states to apply for three-year waiver renewals. The Office of the State Superintendent of Education (OSSE) intends to file a renewal application with the U.S. Department of Education by March 31, 2015 deadline, and to submit additional amendments to the waiver (especially around accountability) after June 1, 2015. The District of Columbia State Board of Education (State Board) supports seeking this renewal and pursuing the additional amendments. The State Board has discussed the waiver with stakeholders and with OSSE. The recommendations that follow constitute an initial set of recommendations to OSSE for inclusion in either the initial renewal or the follow-on amendments. The

¹ U.S. Department of Education. ESEA Flexibility. Accessed March 15, 2015.
<http://www2.ed.gov/policy/elsec/guid/esea-flexibility/index.html>

State Board believes that they reflect the requirements of the federal law while including refinements that the board believes address legitimate public concerns and lessons learned since 2010, when the initial waiver was adopted.

Recommendations

The State Board supports OSSE's plan to continue many elements from the District's original waiver, particularly implementation of the Common Core State Standards for literacy and mathematics and the Next Generation Science Standards, with annual assessments of student performance. The State Board also supports holding teachers and schools harmless this school year to establish new proficiency benchmarks on the PARCC and NGSS-aligned science assessments, as approved in the current waiver. In addition, there are several promising new provisions in OSSE's waiver proposal that should accelerate improvement, notably a state support system and professional learning community for the lowest performing schools, and more robust state monitoring and intervention. The goal of this and other efforts is to ensure that every child is equipped with the knowledge, skills, and mind-set to succeed in college, careers, and civic life.

Beyond these and other revisions proposed by OSSE, the State Board recommends the following:

1. State and LEA Report Cards (more details in full report)

- Augment the State and LEA Report Cards with data that would provide families and District residents with a clearer picture of quality, such as extracurricular offerings, the extent of parent engagement, and the use of one-on-one tutoring for academically struggling students.
- Add the results of a research-based school climate survey that would capture such issues as students' sense of safety and engagement and the extent to which teachers are able to share best ideas and work together on behalf of students. Include data on teacher and student retention.
- Add indicators around student health, including vaccination data and whether there is a full-time school nurse on staff.
- Add a compact, thoughtful list of indicators on college readiness.
- Add additional staffing data, including information on availability of psychologists, social workers, counselors, and librarians.

2. Data on student achievement, spending and effective programs

- Measure and report schools' student achievement growth in a "pure" way (perhaps measured as months/years of achievement) that captures the growth of each student from one grade to the next (not the difference in achievement between different student cohorts); that is unaffected by the proficiency levels students bring to school; and that reflects whether tested students were enrolled at the school during most of the year.
- Provide more meaningful student subgroup data, including disaggregation of student achievement data according to the Council of the District of Columbia's definition of students-at-risk, and according to achievement percentiles (as is done by the NAEP, the National Assessment of Educational Progress). Special education data should be reported and disaggregated based on mid-enrollment data (not from the beginning of the year), which is typically not the same as beginning of the year enrollment data. Consideration should be given to reporting it by special education level.
- Provide better information on how funds targeted to at-risk students are used to support effective educational programs.

3. Understand and begin to address the side effects of current accountability system

- Study and address the side effects of accountability, including conducting a survey or research project to assess how much testing and test preparation is taking place in schools and for what purposes, as well as examine the amount and quality of attention paid to non- and less-tested subjects such as social studies, science, and the arts.
- Establish a task force to identify best practices for providing, sustaining, and expanding a rich, broad curriculum in every school.

4. Accountability during the transition to PARCC

- Schools that have otherwise met the criteria should be allowed to exit from a classification (Priority, Focus, Developing, Rising, Reward) if their MGP scores are sufficiently high.
- Schools in intervention in the 2014-2015 school year that do not exit from Priority or Focus status should not have the “pause” affect the timeline that governs their ability to exit their status.
- Charter schools in a Public Charter School Board (PCSB) closure process should not be required to also participate in an OSSE intervention process. If, however, closure leaves the same staff and leadership largely in place with similar students, OSSE should consider what form of intervention is appropriate and called for.
- OSSE’s intervention process should not commence until the PCSB or District of Columbia Public Schools (DCPS) has been able to work with a low-performing school for three years, unless DCPS or PCSB is unable to provide the needed services in the third year.

5. Updates/Reporting

- There should be regular updates on what assistance is being provided to Focus and Priority schools, how program implementation is moving forward, and how students are progressing.
- There should be a process for reviewing and evaluating the District’s new assessments as valid measures of college- and career-readiness.

6. Teacher Certification and Equitable Access

- The State Board looks forward to working with OSSE on these issues, which are ongoing.

Key Elements of the Waiver Application

The U.S. Department of Education's waiver application requires states to respond in three (3) principle areas: rigorous standards; a system of accountability; and educator effectiveness. The State Board supports the following measures in the proposed waiver application:

Principle 1: College- and Career-Ready Expectations for All Students

- Continued support for implementing the Common Core State Standards in literacy and mathematics and aligned PARCC assessment for all students, and for implementing the Next Generation Science Standards, including aligning assessments this year (2015) to measure student learning in science and engineering.

Principle 2: Develop and Implement a State-based System of Differentiated Recognition, Accountability, and Support

- Continue to administer annual assessments and report scores in reading, mathematics, science, and writing on school and LEA report cards.
- Pause for one year (2014-2015) the use of assessment data to classify schools.
- Maintain current school classifications (Priority, Focus, Developing, Rising, and Reward) for the 2015-2016 school year.
- Develop and detail statewide plans to monitor and support school districts' progress for improving school performance, as required by the U.S. Department of Education.
- Eliminate double testing and allow middle school students who, for example, take Algebra 1 and Geometry to "bank" assessment results.
- Develop state plans and capacity to intervene in schools that persistently do a poor job of educating special education students, English language learners, or other subgroups.

Principle 3: Supporting Effective Instruction and Leadership (Educator Evaluation and Support):

- Hold teachers and schools harmless for the 2014-2015 school year to establish a baseline for growth in reading and math proficiency using the new PARCC assessments, and in science.

Background

On March 31, 2015, the Office of the State Superintendent of Education (OSSE) must submit a draft renewal application for the District's Elementary and Secondary Education Act Flexibility Waiver (waiver). The waiver, in place since 2012 and extended in fall 2014, provided the District with flexibility from some of the stricter mandates of No Child Left Behind (NCLB) and allowed the District to set new and achievable annual performance targets and eliminated some barriers to school improvement. In exchange for flexibility, the District agreed to several requirements, including that OSSE develop and implement policies and systems for differentiated accountability, recognition, and support. This led to the creation of a system that measured student progress toward proficiency and classified schools in five categories: Priority (chronically low-performing); Focus (lower performing); Developing (average); Rising (above average and improving); and Reward (highest performing).

Critical provisions of the waiver include how student and school progress will be measured; when and how schools will be identified as meeting or failing to make adequate progress toward annual benchmarks; when and how OSSE will intervene to reward, sanction, or assist identified schools—especially those that miss annual targets; how teachers will be evaluated and supported; and how OSSE will seek public engagement and report on progress in these areas.

In November 2014, the U.S. Department of Education announced a process for states with an approved waiver, including the District, to request a three-year renewal, through the 2017-2018 school year. As before, pursuant to the "Public Education Reform Amendment Act of 2007," the State Board must review and approve the waiver renewal application – which is the District's state accountability plan.

OSSE has signaled to the State Board that there will be additional opportunities to amend the waiver, pending additional conversations with not only the State Board but also with stakeholders throughout the District of Columbia. As summarized by OSSE, the renewal application will remain smaller in scope, while the conversations around **Accountability 2.0** will include discussions about new academic achievement and growth measures that are aligned to the new assessment, as well as additional technical improvements. It is envisioned that accountability and school improvement will be an ongoing effort, with additional opportunities for the State Board to consider ways to strengthen the system of monitoring, intervention, and support.

Prior Waiver Extension Request

On September 5, 2014 the District was granted a one-year ESEA waiver extension that gave OSSE continued flexibility in how the agency utilizes federal funding to support the needs of schools. Prior to OSSE's final submission of the waiver extension request, the State Board raised a number of issues in its report, ["ESEA Waiver Extension Request: A Swift, Upward Climb towards Excellence,"](#) adopted on June 18, 2014. Among the concerns: the failure of most schools to meet Annual Measureable Objectives – incremental progress toward the goal of advancing proficiency by 50 percent in six years for each subgroup of students – and the continued large achievement gaps. Both points were raised by the U.S. Department of Education in its monitoring report, along with OSSE's failure to "review and provide feedback on school improvement plans, to monitor and assess each school's implementation of interventions, and to develop publicly available progress reports on Focus and priority schools."

As OSSE was proposing the waiver extension, it was in the midst of launching a number of promising efforts to address these concerns, including the LEA Support Team Model. The State Board asked in the same June 2014 memo that OSSE "include a process for ongoing evaluation of school improvement efforts," disseminate quarterly reports on the performance of subgroups, provide the State Board with

updates on the implementation focused on school-level and student-level outcomes, and reassurances that OSSE has the expertise to ensure the necessary monitoring. The State Board further requested that approval of subsequent amendments and waivers include “public input and review and evaluation by experts.”

The State Board noted that many stakeholders objected to the current nomenclature for classifying schools (as parents and other stakeholders find the words “Priority” and “Focus” ambiguous to the performance of the school) and that the different systems used by OSSE, DCPS, and the PCSB were confusing to parents and sometimes in conflict. The State Board noted the “implementation of No Child Left Behind (NCLB) led to state accountability systems driven by incentives and sanctions. NCLB moved states forward, but was insufficient.” The State Board asked OSSE to “consider adding additional metrics of student and school performance,” including on “school climate and perhaps student and parent satisfaction,” as one way address the narrowness of NCLB’s metrics.

The State Board concluded with their hope that the District could move forward towards “thoughtful reform of accountability systems,” noting that, “We must work together to design an accountability system that has both some of the ‘teeth’ necessary to hold schools accountable for their performance and that provides schools with the necessary support, capacity, autonomy and resources to spur innovation and ensure that all students receive a high quality and equitable education.”

Progress and Change Since the Waiver Extension’s Approval

Since the State Board adopted its report, [“ESEA Waiver Extension Request: A Swift, Upward Climb towards Excellence,”](#) in June 2014 and the waiver extension in September 2014, OSSE has established the LEA Support Team model as promised and outlined in its proposed waiver renewal many new efforts to support Priority and Focus schools. Further, OSSE has indicated its intent to provide more intensive and customized support to a more targeted group of schools over time. The agency also has proposed the addition of new metrics for measuring school progress, a plan for pausing classifications during this assessment-transition year, and interest in seeking larger changes in how school success is measured. The State Board believes that all of these steps are responsive to what members of the State Board have been hearing from their constituents—the parents, teachers, taxpayers, and voters who support and depend on our schools.

The State Board also notes that there has been a dramatic turnover in the District’s education leadership in the past three months. The state superintendent departed in mid-December, the interim state superintendent will return to overseeing elementary and secondary education, and a new state superintendent will start by the end of March 2015. Likewise, the District has a new mayor, a new Deputy Mayor for Education, and three new members of the nine-member State Board (three members were on the State Board during the original waiver application in 2011).

The State Board is committed to continue working as a constructive partner and to bringing members’ unique understanding of their communities as well as their expertise and experience to improve educational opportunities and outcomes for the District’s students.

All of this makes for a dynamic, hopeful environment in which priorities are being re-examined and fresh ideas raised. Given all of the above, the State Board offers the following advisory guidance. The State Board is open as to whether they should be included in OSSE’s initial waiver renewal application or in a later amendment submission.

Findings

The need for more information

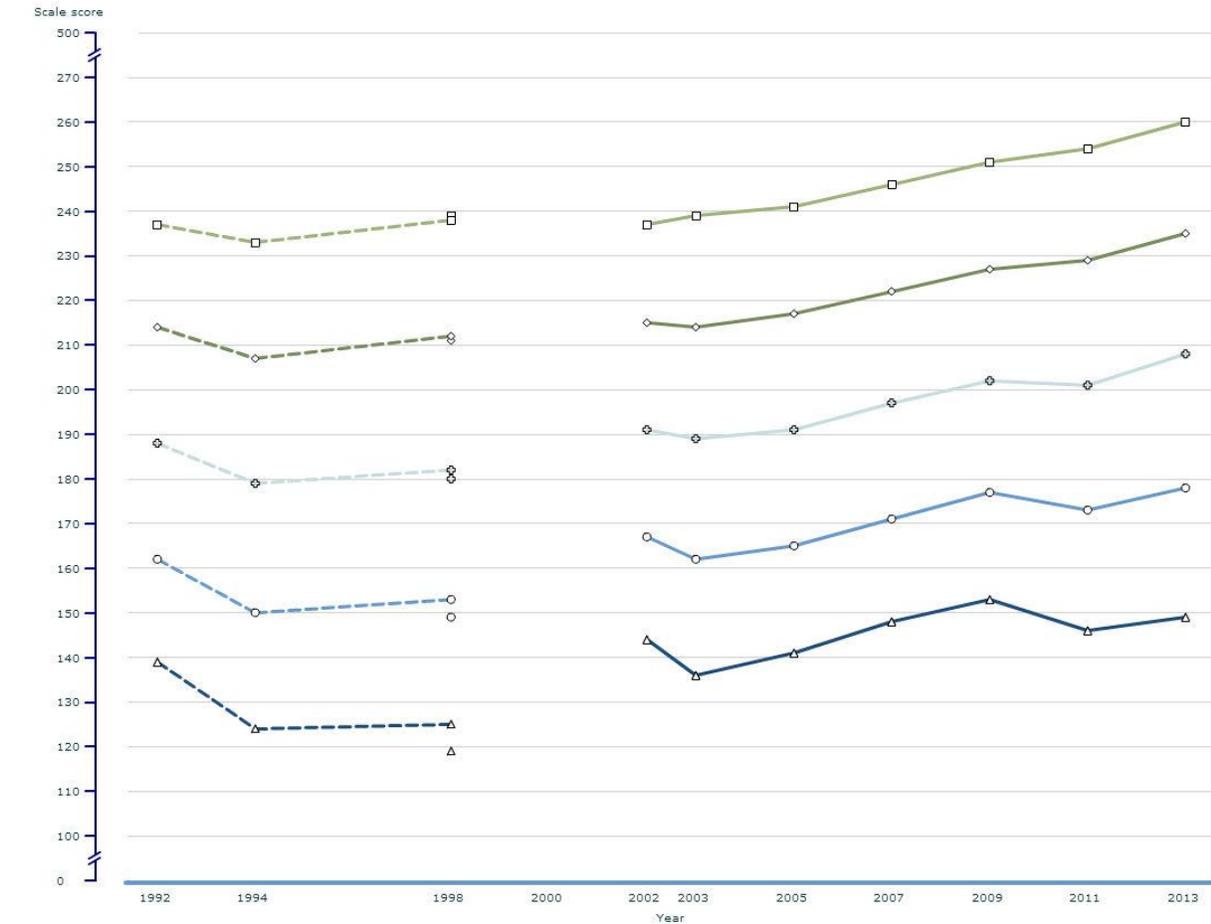
In approving the waiver, the State Board is being asked to approve a particular set of interventions as well as a system of supports aimed at lifting our most vulnerable students at our most challenged schools. But vital information is missing that could inform that decision and other efforts to improve educational outcomes for the District's most at-risk students.

Achievement data for our most at-risk students.

The District's schools have received much attention for raising overall student achievement at a more rapid rate than other cities and states. But there have long been concerns that this progress didn't extend to all students or to all schools.

Data from the National Assessment of Educational Progress (NAEP), the largest nationally representative and continuing assessment of what America's students know and can do in various subject areas, suggests that in terms of reading (not mathematics) these concerns are warranted. Of greatest concern is that after six years of consistently strong achievement growth in 4th grade reading (from 2003-2009), the lowest-achieving quarter of students have made virtually no progress since 2009 (average scale score moved from 177-178); the lowest achieving 10% have actually demonstrated declining proficiency rates since then (from 153-149). In DCPS, the lowest-achieving quarter of 4th graders lost ground after 2009 and have barely rebounded to previous levels (average scale score from 2009-2013 has moved from 178-177). Among the lowest achieving 10% of students, the drop was the greatest. Among the lowest-achieving quarter of DCPS 8th graders, reading score drops since 2007 have rebounded but have left students at achievement levels in 2013 that are roughly the same as 6 years earlier (218 in 2007 to 218 in 2013). Similarly disaggregated data from city assessments should be easily available.

Percentile scores for reading, grade 4 by all students [TOTAL] for year and jurisdiction:
 1992, 1994, 1998, 2000, 2002, 2003, 2005, 2007, 2009, 2011, and 2013
 District of Columbia, All students

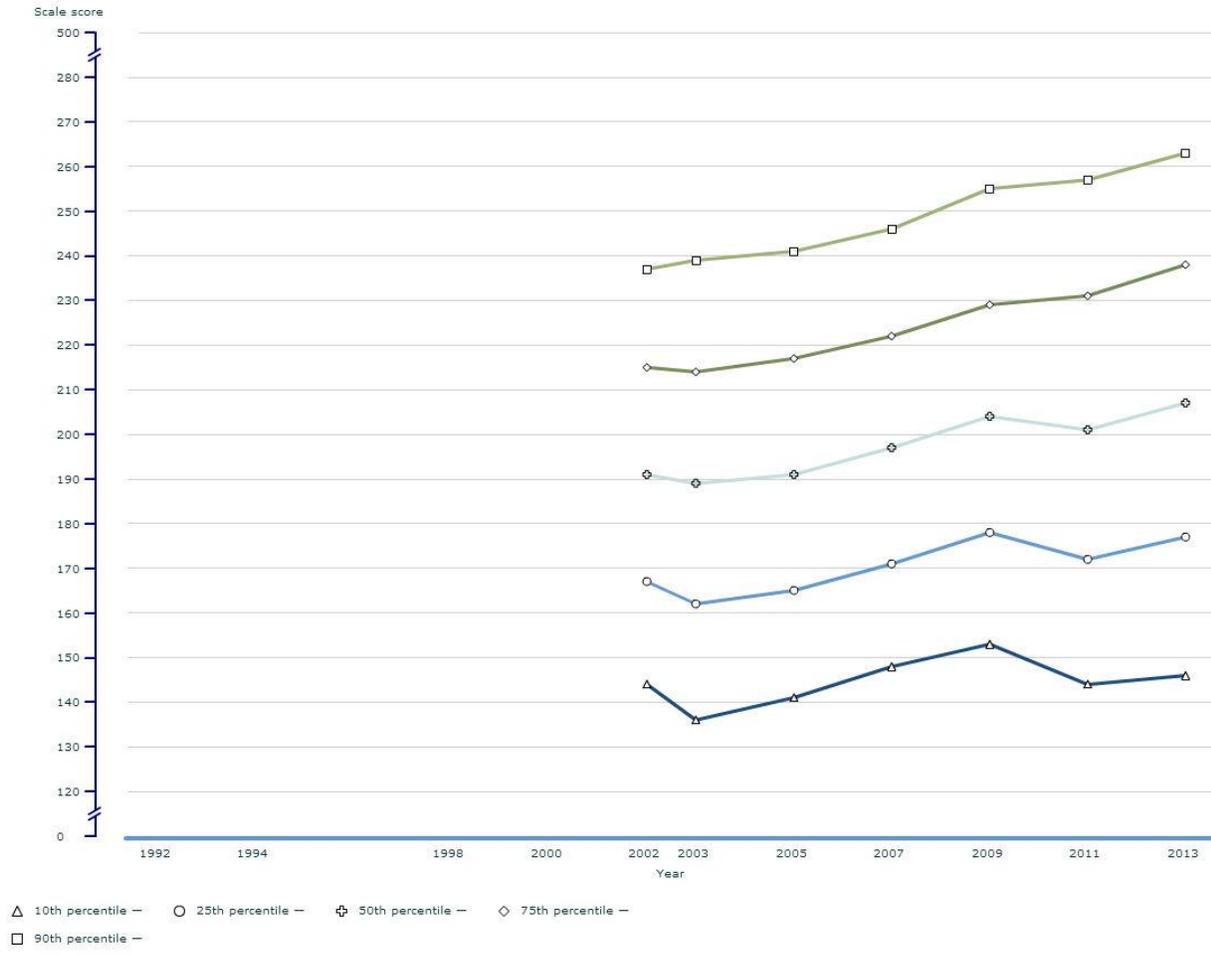


△ 10th percentile — ○ 25th percentile — ⊕ 50th percentile — ◇ 75th percentile —
 □ 90th percentile —

--- Accommodations not permitted.
 — Accommodations permitted.

— Not available.
 * Accommodations were not permitted for this assessment.
 NOTE: The NAEP Reading scale ranges from 0 to 500. Some apparent differences between estimates may not be statistically significant.
 SOURCE: U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP), 1992, 1994, 1998, 2000, 2002, 2003, 2005, 2007, 2009, 2011 and 2013 Reading Assessments.

Percentile scores for reading, grade 4 by all students [TOTAL] for year and jurisdiction:
 1992, 1994, 1998, 2000, 2002, 2003, 2005, 2007, 2009, 2011, and 2013
 District of Columbia (DCPS), All students



— Not available.
 † Accommodations were not permitted for this assessment.
 NOTE: DCPS = District of Columbia Public Schools. The NAEP Reading scale ranges from 0 to 500. Some apparent differences between estimates may not be statistically significant.
 SOURCE: U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP), 1992, 1994, 1998, 2000, 2002, 2003, 2005, 2007, 2009, 2011 and 2013 Reading Assessments.

Use of Resources/Effective programs

The State Board is aware that many efforts have been and are being made to accelerate progress among our lowest achieving students. As noted, OSSE has just put into place a number of new programs to assist Priority and Focus schools. The State Board applauds the new programs and hopes that they will provide needed support and lead to improved learning in these schools. But whether at these schools or elsewhere, the State Board lacks the information to understand what's been tried, what's working, and what's not working. The State Board hopes to work with OSSE to find ways that the State Board and the public can better understand where funds for at-risk students are going, what programs they support, and whether they are effective.

Accountability and its Side Effects

Side Effects

The preparation of the waiver renewal application is an opportunity to engage the public and think through how the District has been approaching testing, accountability, transparency, and school improvement—the key ingredients of the waiver. It is an opportunity to reconsider how we measure student achievement, the data collected, and how it is used to paint a more complete picture of school quality and characteristics, how we provide school information to the public—and the effect of our accountability system on how schools and teachers do their jobs.

The waiver offers some very important steps in this direction, including adding metrics to the report card on healthy schools and college- and career-ready metrics and convening a task force to consider changing how student achievement is judged.

However, there is growing discontent with the side effects of the District's accountability system. Complaints about these side effects, including excessive testing and test preparation, loss of instructional time, and the narrowing of the curriculum (especially in elementary grades) have emerged at many community meetings.² This issue arguably was the biggest concern that came up in community meetings. Consequently, the State Board believes that it is important that the waiver acknowledge these concerns, propose some steps to mitigate them, and resolve to take the issue much more seriously as we move forward.

The State Board has some initial recommendations including an immediate study of the issue. According to OSSE, students spend about 9.5 hours a year to take state assessments, unless they are in grades tested in science or writing, in which case the total is 11.5 hours. Yet in some cases, it is reported that 17 different instructional days have included time devoted to test prep and testing. With the new PARCC assessment rolling out this spring, there's a need for better information and public engagement on this topic.

State and LEA Report Cards

In the proposed waiver renewal application, OSSE proposes to add quality metrics in several areas: college readiness, healthy schools (as related to the District's Healthy Schools Act), and instructional staff data (the additional instructional staff data would bring the District into compliance with federal regulations). The State Board supports the direction of these proposals. However, additional metrics

² The Center for Education Policy's 2008 report revealed the magnitude of the narrowing of the curriculum in elementary schools:

<http://www.cep-dc.org/displayDocument.cfm?DocumentID=309>

that provide information about around parent engagement, curriculum breadth, and extracurricular activities could also provide students and parents with useful information as they plot their academic trajectory. In addition, by asking for certain information and making it public, it would become more apparent to schools, parents, and the public that there are other considerations beyond test scores.

Nonetheless, the State Board is mindful of adding additional data collection tasks to schools and LEA's; where possible, the State Board hopes that OSSE can make use of data that already resides with either DCPS or the PCSB.

Accountability Pause

Given that this is the first year of administering the PARCC assessment, there will be no data from which to measure student progress. The State Board concurs with OSSE that neither teachers nor schools should be judged based on the 2014-2015 school year PARCC scores. As a result, no new schools will be classified as Priority or Focus. OSSE proposes maintaining schools in their current classifications. The State Board urges OSSE to consider allowing schools to exit from Priority or Focus status if their median growth percentile (MGP) scores on the PARCC are significantly high enough. For example, PCSB has set a threshold of 75 percent of students being proficient. The State Board offers this proposal for two reasons. First, preventing schools from exiting simply because OSSE does not have an appropriate measure is unfair, and second, it is possible through the use of MGP to derive an appropriate and reasonable measure for enabling a school's exit. OSSE has expressed an interest in being able to intensely focus on a smaller number of the neediest schools; allowing high-scoring schools to exit advances that goal.

For the same reason, the State Board supports the PCSB's proposal that schools that are already in the process of being shut down by the PCSB and already are involved in the PCSB's close-down process need not undergo OSSE intervention. If, however, closure leaves the same staff and leadership largely in place with similar students, OSSE should consider what form of intervention is appropriate and called for. If DCPS and PCSB are willing and capable of supporting schools in their third year of intervention, the State Board is not supportive of OSSE's takeover of those schools until the fourth year of intervention.

Revision of Teacher Licensure

The waiver proposal includes a report on many changes that are being made in teacher licensure, with more expected. By statute, the State Board must review and approve such changes and suggestions of updates to licensure requirements are needed and welcome. As the District has received a poor score on the National Council on Teacher Quality's annual report, and as Board members frequently hear complaints about the District's lack of reciprocity with other states, the State Board supports licensure revisions. Thus far, however, the State Board has not seen the emerging proposals and can't comment on them.

Recommendations

1. State School Report Cards

As noted in the waiver renewal application, the State and LEA Report Card provides parents and the public important information on the quality of the entire school program, and especially the quality of the educational experience. The State Board also recognizes that collecting additional data can be burdensome to individual schools and/or stretch the capacity of LEAs and OSSE. As a result, the State Board seeks to strike a balance and requiring the least possible data that can provide the public with the

clearest possible picture. The State Board also notes that as more data is made available, it is increasingly important to think about how to protect and present it. The State Board encourages OSSE to continue to consider how best to display and make this data available, including looking at the new “data dashboards” with which some states are experimenting as well as explore ways for OSSE to provide LEAs with data reports that would let them tailor instruction and intervention – rather than leave it to individual schools try to crunch their own numbers.

State school report cards, published on the LearnDC website, contain a wealth of information. One of the ideas and concerns that emerged from community forums and in conversations with state board members involved the desire to broaden the curriculum, educate the “whole child,” and cut down on the “over-testing” of students. There also was confusion over school classifications (priority seemed to indicate quality, for example) and concern about “unfair” evaluation systems that emphasized a narrow set of scores and applied them to every teacher in a school.

The State Board has heard from many constituents and considered a number of additional data points that could improve the State and LEA Report Cards. Recognizing the need to conduct additional research and benchmarking of other states, the State Board offers the following suggestions:

Health-related Data

Anecdotally, much of this information (e.g. vaccination data) is already available, but it should be aggregated and made easily accessible and comprehensible to the public. Specific points could include:

- Information related to implementation of the Healthy Schools Act (e.g. school gardens)
- Vaccination rates
- Availability of a full-time school nurse(s)
- Other relevant, already-available health data, from other sources, aggregated in an accessible, comprehensible way

School Climate and Student Engagement Data

- Data on bullying; and
- Student/teacher satisfaction and engagement, based on surveys
- Safety
- Suspensions (per grade)
- Extra-curricular activities
- Average number of books per student in school library

Staffing Data

- Teacher experience and retention, including, 1, 2 and 5 year turn-over rates
- Proportion of teachers with 3 or fewer years of experience
- Number and certification of school counselors, and counselor-student ratio
- Social worker-student ratio
- Psychologist-student ratio
- Teacher-student ratio
- School librarians

Parent/Family Engagement Data

- Parent survey data;
- Attendance at parent-teacher
- Percentage of families that receive a home visit;
- Presence of a PTA and frequency of meeting

- Number of students that withdraw from dissatisfaction with school

Support for Struggling Students

- Number of students two or more years behind in reading;
- Number of students two or more years behind in mathematics;
- Number of school staff beyond classroom teachers involved in providing literacy and math instruction to students
- Average hours per week that such students receive one-on-one instruction

College-Ready metrics, such as a thoughtfully selected subset of the metrics proposed in OSSE’s draft waiver will be less burdensome and provide adequate information on this important issue.

2. Data on Student Achievement, Spending and Effective Programs

- Measure and report schools’ student achievement growth in a “pure” way (perhaps measured as months/years of achievement) that captures the growth of each student from one grade to the next (not the difference in achievement between different student cohorts); that is unaffected by the proficiency levels students bring to school; and that reflects; and that reflects whether tested students were enrolled at the school during most of the year.
- Provide more meaningful student subgroup data, including disaggregation of student achievement data according to the Council of the District of Columbia’s definition of students-at-risk; and according to achievement percentiles (as is done by the NAEP, the National Assessment of Educational Progress), as well as proportions of students in these subgroups.
- Provide better information on how funds targeted to at-risk students are used to support effective educational programs .

3. Understanding and beginning to address the side effects of current accountability system

- The waiver sets forth the District’s plans for the near future regarding accountability. That plan should include a deliberate effort to understand and, if appropriate, address the side effects of accountability. The State Board asks that the waiver include a commitment to:
 - Conduct a survey/research project that assesses how much testing and test preparation is taking place in our schools and for what purposes; the effect of logistical challenges on teaching and learning; and the amount and quality of attention paid to the non- and less-tested subjects, including science, social studies, and the arts. Among the issues that should be looked at are the differential effects depending on school grade level and school demographics. Possibly these should be two separate studies, one that looks at testing and test prep and another that investigates the availability of a rich, broad curriculum.
 - Using the results from the survey(s), establish a task force to identify best practices for providing a rich, broad curriculum and determine how best to support and extend such practices

4. Accountability During the Transition to New Assessments

- Schools that have otherwise met the criteria for exiting a given classification should not be prevented from exiting that status if their MGP scores are sufficiently high. The PCSB’s recommended a threshold of 75 percent appears sensible.
- Schools that are in intervention this year and do not exit this year should not have this (frozen) year count against the clock that leads to further sanctions.

- Schools that are in a PCSB-closure process should not be required to also participate in an OSSE intervention process. If, however, closure leaves the same staff and leadership largely in place with similar students, OSSE should consider what form of intervention is appropriate and called for.
- Schools should not enter OSSE's intervention process until DCPS or PCSB has been able to work with them for three years, unless DCPS or PCSB is unable to provide the needed services in the third year.

5. Updates/Reports

- There should be regular updates on what assistance is being provided to Focus and Priority schools, how program implementation is moving forward, and how students are progressing.
- There should be a process for reviewing the District's new assessments as valid measures of college- career-readiness. How have they lived up to expectations and what improvements can be made to their administration.

6. Teacher Certification and Equitable Access

- The State Board looks forward to working with OSSE on these issues.

Ultimately, the hard work of educating children rests with teachers in the classroom. The State Board believes that a waiver will support educators, encourage innovation, and, most importantly, support students, families, and taxpayers in their pursuit of the common goal of college- and career-readiness – and a way to measure every child's progress toward that goal. We look forward to continuing to work with OSSE on further amendments to the waiver, on teacher certification, and on a state plan to assure equitable access to excellent educators as the U.S. Department of Education has tasked all states to develop