June 16, 2021

The Hon. Phil Mendelson
Chairman
Council of the District of Columbia
1350 Pennsylvania Avenue NW
Washington, DC 20004

Dear Chairman Mendelson and Councilmembers:

I write to follow up on the June 8, 2021, Committee of the Whole budget hearing with representatives of the Bowser Administration education agencies including the Office of the State Superintendent of Education (OSSE), Deputy Mayor for Education (DME), D.C. Public Schools (DCPS), and District of Columbia Public Charter School Board (DCPCSB).

Many of the Councilmembers' questions, particularly those addressed to Interim State Superintendent of Education Shana Young, related directly to the findings and recommendations of the Council-mandated education data audit released in March, Measuring What Matters: More and Better Data Needed to Improve D.C. Public Schools. I thought it would be useful to provide additional information on concerns raised by Councilmembers as you consider priorities for public education in the coming months. I also attach an excerpt from my ODCA budget testimony that includes draft amendments on education data for the FY 2022 budget and FY 2022 Budget Support Act of 2021.

Early Childhood Education

Chairman Mendelson asked Ms. Young about multiple early childhood education investments. Importantly, the data audit found that the District is not currently collecting complete early childhood data across all publicly funded pre-K sites. More specifically, OSSE does not require public charter schools—which are educating more than half of D.C.'s preschoolers—to participate in all early childhood education quality assessments. For example, the teacher data collected as part of the Classroom Assessment Scoring System (CLASS) is incomplete for public charter schools (PCS). OSSE's own reporting states that, "OSSE collected teacher survey data using teacher interview surveys for CBO and DCPS classrooms. Public charter schools maintain an autonomous governance structure and did not allow this data to be collected in their programs. OSSE did not obtain Public Charter teacher characteristics data." The D.C. Code is very clear that OSSE has the authority to collect this information from all Local Education Agencies (LEAs).

In addition, OSSE funded the Early Development Instrument (EDI) data collection as a voluntary program run through RaiseDC, with DCPS participation each year, but only 11 out of the 38 PCS LEAs enrolling preschool students last participated.

These gaps leave the District unable to adequately assess improvement for all early childhood students. OSSE has been able to analyze early childhood education (ECE) data across all DCPS schools to look for relationships between classroom quality and teacher characteristics, for example, something they have been unable to do for PCS. Continuous improvement in ECE requires a commitment to collecting basic, common data across all early childhood settings.

Councilmember Lewis George asked about salary scales for early childhood teachers across all sectors including DCPS, PCS, and community-based organizations (CBOs) to understand the variation across sites to ensure fair compensation for early childhood educators across D.C. She also shared data collected by OSSE about salaries for providers of subsidized childcare in the District. The data audit documents that, while we are collecting data about DCPS early childhood educator salaries, we are not collecting charter school early childhood educator salary data at the individual level. This lack of data makes it extremely difficult for the District to compare and understand basic labor market parameters for early childhood educators in D.C. and what is needed to reach fair compensation commensurate with credentials and experience.

Career & Technical Education; High School Disengagement and Dropout

Councilmember Trayon White asked Ms. Young about both career and technical education investments and what OSSE is doing to monitor and help students at risk of dropping out of high school and those who may have already dropped out. With regard to career and technical education (CTE), the data audit found that OSSE is not linking detailed CTE data to student enrollment records nor is OSSE collecting the student course data needed to understand the effectiveness and impact of any given CTE program. In contrast, research using Virginia's statewide longitudinal data system found that CTE students benefitted significantly in the workforce and postsecondary by taking advanced math courses in high school. The District does not have the capacity today for this type of research and understanding.

The data audit also found that although OSSE committed to building an Early Warning System to identify and support students at risk of dropping out of high school in a successful 2012 grant application, this system was not created. Importantly, OSSE does report dropout rates to the U.S. Department of Education every year for all 7th through 12th graders and by subgroup; however, these rates are not locally reported. ODCA created a working demonstration EWS model to show D.C. education stakeholders the types of high school identification and supports that are possible to have right now in the District. The draft budget amendments included in this letter address both the data infrastructure needed to understand our program investments like CTE, and a process to create an EWS in the District, informed by our demonstration model and best practices, to lessen high school drop outs and disengagement before they occur.

Postsecondary Persistence and Success

Councilmembers Henderson and Trayon White asked about post-secondary persistence in both two-and four-year colleges. They asked when and where District students face obstacles in persistence in postsecondary and the supports needed to continue. While OSSE does have postsecondary enrollment, persistence, and graduation data, currently only aggregate postsecondary enrollment is reported on school report cards. To answer questions exactly like those posed by Councilmembers during the hearing, the audit recommends immediately reporting on and using existing postsecondary persistence and graduation data to better understand and support students throughout their postsecondary careers. As mentioned above, the draft budget amendment attached here addresses the data infrastructure we need—a statewide student information system, or SIS—to support these types of longitudinal questions and interventions.

Vaccinations

Councilmember Allen asked Ms. Young about student immunization records. Importantly, immunization status on all required vaccines is a data element typically included in most off-the-shelf statewide SIS packages. Having these data already linked to longitudinal student enrollment across the District would be invaluable right now and throughout the pandemic recovery.

Out-of-School-Time Programming

Councilmembers Allen, Henderson, and others asked multiple questions about District investments in out-of-school-time (OST) programming. Councilmembers asked about whether OST need and demand are being met now or will be in the future and about the quality and reach of current programs. Again, specialized program enrollment is a critical data element to collect and use to better monitor and evaluate important and substantial OST investments across the District. If these data were linked to longitudinal student enrollment records administrators and policymakers could evaluate the participation in and effectiveness of various OST providers by student subgroup. That is, we could research not just whether something is meeting a demand but whether it is working and for whom.

Post-Pandemic Tutoring

Several Councilmembers asked about planned "high-dosage" tutoring as a strategy for addressing learning loss following the pandemic. Councilmembers Henderson and Robert White asked whether OSSE will evaluate the success of tutoring programs. Councilmember Silverman asked how schools and students will be identified for tutoring services. Chairman Mendelson asked how tutoring providers will be identified and the timeline for the provision of tutoring. All of these questions could be more robustly answered with a statewide longitudinal data system (SLDS) that tracks student program enrollments and attendance alongside multiple outcome measures over time.

In fact, as expert witnesses testified during the May 26, 2021, Joint Public Oversight Hearing on the District's Public Education System After the COVID-19 Pandemic, many schools in D.C. have likely been using strategies like high-dose tutoring for years. If the District had robust longitudinal data, we would already know how effective high-dose tutoring has been, by whom (which providers) and for whom (which students). It is imperative that the District have a real statewide longitudinal data system in place to effectively track and monitor federal stimulus dollars going forward especially given that the American Recovery Plan's $123 billion Elementary and Secondary Schools Emergency Relief fund requires "ongoing efforts to examine the effects of such a strategy or intervention." The attached draft budget amendment provides the most efficient way to implement a SLDS via a statewide SIS, customized by OSSE.

Adult Education

Councilmember Henderson asked about support for adult education charter LEAs and Councilmember Silverman asked about adult learning and literacy programs. The data audit found that adult education programming is not well understood and leveraged at the District-level. For example, adult enrollment patterns across the year differ substantially from K-12 enrollment patterns yet these patterns are not well understood due to enrollment data quality issues. Similar to understanding and monitoring any program investment, like CTE, tutoring, or OST, adult literacy programs are not yet adequately tracked across the District and over time. In their 2012 federal grant application, OSSE proposed building the capacity to answer questions similar to those posed by Councilmembers about adult education, CTE, and postsecondary outcomes. These are the types of questions the large majority of other states can answer today.

OSSE's 2012 successful SLDS federal grant application pledged to build capacity to answer these questions:

1. What length of time does it take for graduation and completion by program?
2. What percentage of high school graduates end up in developmental classes?
3. What is the transfer rate out of postsecondary to other institutions?
4. What is the transition rate of students who leave postsecondary for the workforce?
5. What is the persistence rate for postsecondary and workforce students?
6. What are the postsecondary and workforce training graduation rates?

Social-Emotional Learning and School Climate

Councilmember Silverman asked how the Mayor's budget addresses the need for social-emotional learning (SEL) and Councilmember Henderson asked about both SEL and school climate and safety investments.

As discussed in the audit, many states have added and are benefitting from a common school climate survey to better monitor and improve student social-emotional needs, school climate, and school safety. We were pleased to see that D.C.'s new research practice partnership led by

the Urban Institute just [sent a letter to the Chairman with data infrastructure recommendations](#) that echo our audit recommendations including a specific recommendation to invest in a common school climate and student supports survey across the District. Other states continue to use these data to understand and support student SEL needs and guide their funding decisions.

Capital Investment in Data Systems

Councilmembers Henderson and Lewis George asked Ms. Young about planned investments in state education data systems. More specifically, Councilmember Lewis George asked which data elements OSSE would be able to report on in the next fiscal year that have not been reported this year, including teacher-student links, student courses, credits, and grades, college persistence and graduation, and common teacher data across all schools. While OSSE has indicated they are planning some additional collections and infrastructure investments they appear incomplete and highlight a continued ad hoc approach to implementing a statewide longitudinal data system. Further, no commitment was made to collect or report on student credits and grades, teacher-student links, and college persistence and graduation and no final timeline was provided during the hearing for the planned student course collection.

The draft budget amendments included in the attached testimony excerpt would begin to address the data infrastructure deficiencies identified in the audit in an efficient and systematic way, through a statewide SIS, a tool now commonly being used across the country. While these are highly customizable, this amendment would provide OSSE with $15 million to support the purchase of a statewide SIS. Further, the amendments specific to an EWS and a student course, credit, and grade collection—both of which have been proven to be better predictors of high school graduation and postsecondary success than standardized test scores—will ensure that the District is using data to inform decision making and intervention during our recovery.

I hope this additional information is useful as the Council moves forward with spending decisions for the remainder of the current fiscal year and for FY 2022. ODCA Director of Education Research Erin Roth (erin.roth@dc.gov) and I are available and happy to respond to any questions on these and other issues addressed in the education data audit mandated by the Council.

Sincerely yours,

Kathleen Patterson
D.C. Auditor

Attachment

Office of the District of Columbia Auditor

Excerpt on Education Data Audit

Testimony of

The Hon. Kathy Patterson

District of Columbia Auditor

Prepared for the

Council of the District of Columbia

Committee of the Whole

Public Hearing on the

FY 2022 Budget for the Office of the D.C. Auditor

June 7, 2021

Virtual via Zoom
The John A. Wilson Building
1350 Pennsylvania Ave., N.W.
Washington, DC 20004

ODCA Recommendations with Budget Impact

While a majority of the recommendations in ODCA reports revolve around stronger controls and better program performance, some clearly have budget implications and in our current report format we indicate when a recommendation has a budget impact, whether negative or positive. A major recommendation with significant budget impact derives from the education data audit.

Education Data System

In the education data audit required by the District of Columbia Education Research Practice Partnership Establishment and Audit Act of 2018, Measuring What Matters: More and Better Data Needed to Improve D.C. Public Schools, ODCA recommended purchase of a state-level student information system to help the District complete a statewide longitudinal data system, something to which the District committed repeatedly in testimony and successful federal grant applications from 2007 to date. Mr. Chairman, the research practice partnership was a priority for you in Council Period 23. I am hopeful that you will make completion of this critical supportive capacity a similar priority in the FY 2022 budget. As the data audit made clear, the RPP will not be able to fulfill its mission without an actual *statewide* data system that collects and uses data *longitudinally*.

The need for comprehensive, high-quality education data was reiterated by the expert witnesses you and your colleagues invited to testify before the Committee of the Whole/Special Committee on COVID-19 Pandemic Recovery joint hearing on May 26, 2021. Dr. Jack Buckley, former Commissioner of the National Center for Education Statistics and now an Institute Fellow at AIR, emphasized how important it is in addressing learning loss to "identify where each student is on key academic dimensions" to be able "to deliver evidence-based interventions tailored at the student level." The District simply cannot do that effectively today.

As you'll recall, he described other state education agencies providing low-cost diagnostic tools to all LEAs and families in the state. Investments like this – at the state level – to provide "valid, reliable, effective, and efficient" diagnostics are critical to understanding the roadmap to learning recovery for all District students. He said, "There will be a lot of noise in this coming year… Some of these learning recovery strategies will work. Most will not."

The District does not have the public education data infrastructure to know at the state level what is working and what is not. We risk allocating hundreds of millions of stimulus dollars in ineffective interventions without a mechanism for accountability. While other states will be closely monitoring both academic and non-academic outcomes, at the student level, over time, to validly diagnose and intervene, the District's state education agency does not have the tools to do this work.

Another invited witness, Maria Blaeuer, Director of Programs and Outreach at Advocates for Justice and Education (AJE), discussed the importance of data systems and transparency. She

acknowledged that the District needs but does not have "a functional system for managing and sharing student data" and said that that "impacts the quality of instruction students receive." She cited the recent media report on former National Collegiate Prep Student Aaliyah Jones's graduation challenges, noting that "while a functional system is important for policy planning, effective governance and greater transparency, it is also important for families and students." She recommended to you, Mr. Chairman, that in the post-pandemic period "we can build back better."

The proposed capital budget for the Office of the State Superintendent of Education in fact includes another $4.3 million in the Data Infrastructure project, and the language of the project acknowledges that "existing data systems are old and obsolete." It notes that as OSSE expands the scope of its current database to include more data "the need for enhancement in both [the database] and the source data systems has become a critical area for improvement for the District as a whole." The continued capital spending, however, apparently does not include moving toward a Statewide Longitudinal Data System and, instead, appears to continue to focus on "application development work," or – put another way – a piecemeal approach to data collection and retrieval.

The Council-mandated data audit recommended purchase of an Student Information System (SIS) and while I cannot give a precise dollar figure on what that would cost the District since that likely would be based on the level of customization sought, I can share some limited information. When the state of Wisconsin initially planned to purchase a statewide SIS between 2013 and 2015 they budgeted $15 million, and the state has more than 400 local education agencies compared to the District's 60-some, and more than 800,000 students compared with 100,000 here. One of the expert witnesses who appeared in the joint COW-special committee hearing two weeks ago suggested such systems range from $5 to $10 million, and a state can expect to spend upwards of $1 million a year in continuing to build data capability and access.

Another recommendation the Committee should consider in this budget cycle is to require OSSE to move forward on something Interim Superintendent Shana Young expressed great interest in during testimony on March 19, 2021. She described the importance of having a course collection, one of the data elements outlined in our report and one of the most critical, as student courses, credits, and grades are proven to be better predictors of academic success than test scores. Not collecting these data leaves us without one of the most important pieces of information needed to validly and effectively diagnose and intervene. This work had already been completed by three-quarters of the states as of 2018 guided by existing course alignment and definitions available for free to any state or local education agency interested in using them. Another 8% of states had a course enrollment collection system in progress and another 6% were in the planning stages three years ago. The District is among the small minority of states who neither have this work implemented, in progress, or planned. Budget Support Act language could require OSSE to produce a proposal for a course collection including costs, and, potentially, advocating for a statewide SIS as a framework for such a critical collection.

An important element in budget season is the potential for cost savings from doing a better job in collecting and using education data. We know from meetings we have had with charter

leaders that many of the District's local education agencies are spending significant public funds doing the course equivalency work that is routinely done by state education agencies elsewhere. This is an inefficient use of public money and a burden on schools in a time of crisis. The audit provided the Council and this Committee with evidence of multiple burdensome and inefficient data collections that would be ameliorated with a robust, centralized system like other states have. A state level SIS would provide an off-the-shelf, high-quality mechanism for collecting data in the District. Investing in a statewide SIS, with a student course collection, and optimally, teacher-student links included, will save the District money overall and give LEAs and schools back needed time and capacity to focus on better serving students.

Another factor in budget decisions: without a statewide longitudinal data system, not only does the District continue to put itself at risk of being out of compliance with federal and local reporting requirements, without the capacity to understand what works in learning recovery, we are also at risk of not being eligible for future grant opportunities as more and more federal and nonprofit funding opportunities are tied to robust evidence-gathering and use.

As we reported when releasing the education data audit in March, the District of Columbia has spent $25 million in District capital funds and more than $10 million in federal SLDS grant funds without completing a statewide longitudinal data system in spite of commitments to do so. At this juncture it might be possible to use some of the federal American Rescue Plan funding – either the education or the capital funds – on capacity to measure learning loss and I urge you to consider this among your options for funding what we have proven is needed to move education forward.

Mr. Chairman, when the Fenty Administration created the current Office of the State Superintendent of Education in the Public Education Reform Amendment Act and charged OSSE with building comprehensive data capacity, the language specified that the development would be "in coordination with the Office of the Chief Technology Officer." Because of the continuing turnover on the OSSE teams tasked with data collection and management, I recommend that the Committee secure the assistance of OCTO in moving forward with the needed statewide longitudinal system. My team and I would be happy to work with your staff on specifics for the Budget Support Act, the Local Budget Act and the Committee's budget report and I include drafts as attachments for your consideration.

Attachment: Draft Amendments

1. Amendment to Title IV of the FY2022 Budget Support Act Emergency Act of 2021

SUBTITLE I. Course Collection Initiative

Section 4061. Short Title. This subtitle may be cited as the "State Education Agency Course Collection Plan Initiative of 2021"

Section 4062. DC Official Code § 38-2609 is amended to add a new paragraph (f) as follows:

(f) The Office of the State Superintendent of Education is required to develop in collaboration with the Office of the Chief Technology Officer and submit to the Council of the District of Columbia by December 31, 2021, a written plan to institute an ongoing collection from all D.C. Local Education Agencies of all course codes and descriptions, and course enrollment, including dual enrollment, completion grades, and credit hours using the School Courses for the Exchange of Data (SCED) Classification System as provided in National Forum on Education Statistics guidance.

COW Committee Report Language:

The proposed provision to require OSSE to develop a plan for course collections derives from not only the text of the Council-mandated Education Data Audit performed by the Office of the D.C. Auditor but also from discussion by Interim State Superintendent Shana Young during the Committee's March 19, 2021, hearing on the data audit. Ms. Young shared her strong support for development of such a collection, and the importance and usefulness of the information, and also acknowledged the difficulty of such an initiative. She indicated OSSE intended to pursue a course collection but did not provide a clear timetable for that development. The provision assists in this effort by providing a timeframe for OSSE to develop a plan for implementing a course collection.

Fiscal Impact:

Staff time would be required and the modest fiscal impact can be accommodated in the agency's FY21 budget underspending and salary lapse and the FY22 budget based on the proposed 15% increase in total operating budget.

2. Amendment to Title IV of the FY2022 Budget Support Act Emergency Act of 2021

SUBTITLE J. Early Warning System Demonstration Program

Section 4071. Short Title. This subtitle may be cited as the "State Education Agency Early Warning System Demonstration Program Initiative of 2021"

Section 4072. DC Official Code § 38-2609 is amended to add a new paragraph (g) as follows:

(g) The Office of the State Superintendent of Education (OSSE) shall develop a basic Early Warning System to identify students at risk of high school disengagement and drop out and develop a plan to implement a robust system of supports including recommended targeted learning and socio-emotional supports, school and LEA staff training, and stakeholder engagement. The Early Warning System shall utilize at least the following statewide data, scale scores on prior standardized tests in English Language Arts and math, chronic absenteeism and truancy in eighth grade, current special education, English Language Learner, and at-risk status, any out-of-school suspensions, and mid-year school transfers. By December 31, 2021, OSSE shall invite Local Education Agencies (LEAs) to participate in use of the Early Warning System in a 3-year demonstration program.

COW Committee Report Language:

Addendum testimony provided by the Office of the D.C. Auditor (ODCA) following the Committee's March 19, 2021, public hearing on the Council-mandated Education Data Audit provided a description and template for an Early Warning System (EWS) using data collections currently available in OSSE. The template should serve as a model for the EWS that OSSE develops and provides for use by D.C. LEAs.

Fiscal Impact:

Staff time would be required and the modest fiscal impact can be accommodated in the agency's FY21 budget underspending and salary lapse and the FY22 budget based on the proposed 15% increase in total operating budget.

3. Amendment to Bill 24-275 The Fiscal Year 2022 Local Budget Act of 2021

1) Capital Improvement Plan

    (a) Add $15,000,000 to Owner Agency Code (GD0 (State Superintendent of Education)) and Project No (GD001) Data Infrastructure in FY22

Rationale:

This amendment increases the funding for the data infrastructure project to allow for the purchase/customization of a state-level Student Information System, as recommended in the Council-mandated audit performed by the Office of the D.C. Auditor.