November 11, 2021

The Hon. Phil Mendelson, Chairman
Council of the District of Columbia
The John A. Wilson Building
1350 Pennsylvania Avenue, N.W.
Washington, DC  20004

Dear Chairman Mendelson and Councilmembers:

I write to provide background information and potential questions for the Committee of the Whole public hearing November 12, 2021, on PR 24-393, the State Superintendent of Education Dr. Christina Grant Confirmation Resolution of 2021.

In March the Office of the D.C. Auditor (ODCA) published the education data audit, Measuring What Matters: More and Better Data Needed to Improve D.C. Public Schools. The Council required the data audit in the District of Columbia Education Research Practice Partnership Establishment and Audit Act of 2018. ODCA reviewed data practices and datasets over six school years, from 2014 through 2019, to document what education data are collected and how they are used. The audit’s conclusion: the District’s failure to build a state longitudinal data system has limited the District’s capacity to identify where investment and intervention are most needed to support students and to ensure educational equity across the city.

The audit found that the District has not yet achieved the data system capacity promised in securing $10 million in federal grants nor achieved the data warehouse mandated by the Public Education Reform Amendment Act of 2007. The report recommended a comprehensive improvement plan to address the gaps in the District’s data systems and the first steps in that improvement plan were mandated by the Council in the Fiscal Year 2022 Budget Support Act of 2021. Specifically, the Council required Office of the State Superintendent of Education (OSSE) to develop a plan, in conjunction with the Office of the Chief Technology Officer (OCTO), to:

- Create a standardized course coding system to identify, code, and track all courses offered by Local Education Agencies (LEAs).
- Collect course enrollments, final grades, and credit hours.
- Develop and implement an Early Warning System (EWS) using statewide, longitudinal data to identify students at risk of high school disengagement.
- Make improvements to the District’s Education Data Warehouse system that align with the National Forum of Education Statistics guidance for statewide longitudinal data system capacities.

This plan is due to Council in March of 2022, four months from now.
Mr. Chairman and colleagues, your consideration of Dr. Christina Grant’s nomination to serve as state superintendent of education offers an opportunity to review the issues raised by the data audit, obtain a status report on the data plans required in the Budget Support Act, and secure commitments from the new OSSE leadership to address the need for more and better data to shape public education policy and practice.

I share below potential questions for Dr. Grant based on findings from the education data audit and designed to help the Council build consensus on the use of data to move education reforms forward.

**OSSE mandates and goals**

As mentioned, OSSE is required by D.C. Code to build data capacity across the District’s public education system to foster educational improvement. In addition, OSSE has adopted as its first strategic objective the following: “OSSE will provide high-quality data and analysis that will empower LEAs, CBOs, and providers to meet the needs of all learners and allow education partners to make informed policy decisions.”

1. Have you had an opportunity to learn what data are available to teachers? As an example, during the first week of school, do you know what longitudinal data a middle school principal or an 8th grade teacher had access to for every student in their school or class? Does OSSE plan to create an interactive site that school leaders, counselors, and teachers can access to find current, prior, and actionable data for their students? **How do you plan to meet the D.C. Code requirements and the OSSE strategic objective of providing high-quality data and analysis to local schools and other stakeholders?**

2. The audit found significant missing capacity in data governance, for example. Do you plan to target investment and resources in building data governance capacity within OSSE? **What improvements do you intend to make to the Education Data Warehouse system that are aligned with the National Forum of Education Statistics guidance for statewide longitudinal data system capacities?**

3. In early October, OSSE issued new student discipline data guidance that describes a new method and template for collecting discipline data from LEAs four times a year. The data audit found that OSSE often creates ad hoc collection mechanisms, like this additional set of discipline data templates, rather than making use of its current integrated data collection mechanism, the automated data transfer system or ADT. The audit found that these additional mechanisms increase the burden on LEAs and create opportunities for error to the data. **Why did OSSE decide to create a new quarterly data collection rather than collecting discipline data via the existing ADT?**

**Attendance**

4. The data audit found that OSSE’s attendance data collection was fundamentally flawed. Attendance data differed systematically by school sector (charter versus traditional). Overall, using OSSE’s data, ODCA found attendance reporting differences for almost all charter schools across all years studied and found none of these differences in reporting in DCPS school data. Further, DCPS high schools had an unusually high volume of days recorded as unexcused absences leading to implausibly high rates of truancy. **Have**
you had the opportunity to learn more about these reporting differences and develop a plan to address them to ensure that OSSE’s attendance data collection is valid and reliable across all schools?

Student mobility

5. Please share your views on how to address the District’s student mobility challenges. We know that student mobility has negative impacts on attendance, test scores, engagement, and graduation. What supports can OSSE provide to LEAs serving students who are highly mobile? Is OSSE considering guidance or regulation to minimize disruptive mid-year moves that take place after the yearly count day? Have you had an opportunity to learn what is in place today in state-level monitoring of both year-to-year and mid-year mobility?

6th grade math score growth

6. The data audit found that there has been a consistent decrease in math score growth for sixth graders in the District over multiple years. The audit recommended further research to better understand what factors may be contributing to this decrease in growth and what supports may be needed. Do you plan to conduct research to learn more about the decrease in math score growth in 6th grade to provide additional supports to LEAs?

Alternative placements

7. The audit found an increasing number of students in diploma-granting public high schools being transferred to alternative high schools over time. ODCA found that the share of students ages 15 to 18 enrolled in alternative schools increased from approximately 8% in 2015 to 13% in 2018 and that these percentages are higher for Black students. Other states have experienced similar patterns of increasing numbers of high school students who transferred to non-regular settings and they have developed plans to remediate this trend and ensure that all students, especially those most at risk of disengagement, have access to a high school diploma-granting pathway. Can you describe any plans you have for OSSE to monitor this growth in alternative placements and any plans to ensure the District’s most vulnerable high school students have access to a high school diploma-granting alternative?

Transparency of data

8. This past year, OSSE added postsecondary enrollment rates to school report card data representing an important step forward in sharing postsecondary data with the public and a step recommended in the data audit. Do you plan to continue to expand the postsecondary data shared publicly? Are you committed to sharing postsecondary data across all schools and by subgroup—data such as college persistence, time to graduation, 2-year and 4-year enrollment and degrees, and majors?

9. The audit found that OSSE is collecting and analyzing data on the qualifications and experience of early childhood educators in DCPS and Community Based Organizations (CBO) but is not collecting the same data for charter school early childhood educators. OSSE’s annual pre-K report includes important findings from these data collections and analyses. One finding, for example, is that “including the increased credentialing requirement for teachers and provision of additional funding to support them as they obtained these degrees, appear to be working.”
The 2018 report also noted that CBO teachers with a bachelor’s or a master’s degree in early childhood education had better emotional and instructional support scores than those without a degree. Do you have plans to collect this important data state-wide and provide the same type of analytic insights to charter early childhood education programs as is now provided for DCPS and CBOs?

10. The audit found that while the District collects and reports a number of data elements to the U.S. Department of Education, OSSE does not publish all of the data locally. This includes some discipline data, teacher certification, and student dropout data. Some of the data, such as discipline and teacher data, are required by the federal Every Students Succeeds Act (ESSA) to be included on school report cards. Will you ensure that OSSE reports data locally that are already collected and submitted to the U.S. Department of Education such as dropout data, teacher data, and discipline data?

Mr. Chairman and Councilmembers, we hope these suggested questions and background information are useful in your preparation for the confirmation hearing and the important ongoing work of oversight of the District’s public education system. If you have questions please contact me at kathy.patterson@dc.gov or ODCA’s Director of Education Research Erin Roth, at erin.roth@dc.gov.

Thank you.

Sincerely yours,

Kathy Patterson
D.C. Auditor

cc: D.C. Councilmembers
    Dr. Christina Grant, Acting State Superintendent