

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

<p>Charter Actions Requiring a Vote</p> <ul style="list-style-type: none"><input type="checkbox"/> Approve a Charter Application<input type="checkbox"/> Approve a Charter Renewal (15 yrs.)<input type="checkbox"/> Approve Charter Continuance (5 or 10 yrs.)<input type="checkbox"/> Approve a Charter Amendment Request<input type="checkbox"/> Approve a Charter Agreement<input type="checkbox"/> Give a Charter Notice of Concern<input type="checkbox"/> Lift the Charter Notice of Concern<input type="checkbox"/> Commence Charter Revocation Proceedings<input type="checkbox"/> Revoke a Charter<input type="checkbox"/> Board Action, Other _____ <p>Policies</p> <ul style="list-style-type: none"><input type="checkbox"/> Open a New Policy or Changes to a Policy for Public Comment<input type="checkbox"/> Approve a New Policy<input type="checkbox"/> Approve Revisions to an Existing Policy	<p>Non-Voting Board Items</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> Public Hearing Item<input type="checkbox"/> Discussion Item<input type="checkbox"/> Read into Record
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SUBJECT: Public Hearing: COVID-19 Impact Policy

DATE: April 20, 2020

Proposal

The DC Public Charter School Board (DC PCSB) staff recommends the Board hold a public hearing on the following policy and guidance, which clarifies how DC PCSB staff will implement key policies and practices impacted by the COVID-19 pandemic. Public comment was opened on April 6, 2020 and will remain open until May 6, 2020. This policy will be voted on at DC PCSB’s May board meeting.

Policy and Guidance Summary

The COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs. As such, staff is recommending that DC PCSB cease collection, aggregation, and publication of academic data for school year (SY) 2019-20, and that DC PCSB not produce a School Quality Report (also known as the Performance Management Framework, or PMF) for SY 2019-20.

DC PCSB may continue to collect some non-academic data (e.g., attendance and discipline rates) in order to meet federal and local reporting requirements but will not use these data in accountability decisions.

In addition to these recommendations, this document describes recommended adjustments to DC PCSB oversight and monitoring in response to COVID-19 school closures, including how DC PCSB will adjust implementation of numerous policies and practices.

Background

In response to the COVID-19 public health emergency, District of Columbia Public Schools and public charter schools physically closed on or before March 16 in accordance with a directive from the Mayor. Schools were initially slated to reopen on March 30; however, due to continued public health concerns, the closures were extended to at least April 27. On April 3, the Mayor stated publicly that she expected the closure to be extended.

While all public charter schools developed and implemented distance learning plans for their students, student access to the material may not be equitable due to varying internet access, living situations, or other factors. In addition, the Office of the State Superintendent of Education (OSSE) announced on March 20 that the Spring 2020 administration of end-of-year state assessments has been cancelled, which impacts Partnership for Assessment of Readiness for College and Careers (PARCC), DC Science Multi-State Alternative Assessments (MSAA), and remaining ACCESS for ELLs 2.0 and Alternative ACCESS assessments. OSSE also announced it is “suspending development and calculation of new STAR Ratings for SY 19-20.”¹ Given these factors, DC PCSB staff concluded it would be inappropriate to collect, aggregate, or publish academic data for SY 2019-20.

Proposed Changes to DC PCSB Policies and Oversight

Note: The guidance in this document supersedes any conflicting guidance, contained in DC PCSB’s existing policies or elsewhere, but only for the period of time indicated.

2019-20 PMF Policy & Technical Guide and School Quality Report

DC PCSB will not produce the 2019-20 School Quality Report using the 2019-20 PMF Policy & Technical Guide. DC PCSB will not collect PMF data directly from schools, including early childhood assessments, high school-specific measures, adult education data, and alternative accountability goal data.

Schools that were un-tiered in SY 2018-19 may request that DC PCSB publish the Tier associated with their PMF score on their school profile page on DC PCSB’s website, and schools may publish that tier on their respective websites as well.

¹ OSSE’s COVID-19 Updated Assessment and Accountability Guidance: <https://dcpcsb.egnyte.com/dl/Mn6ls4jMhs>

2019-20 Charter Goals

DC PCSB will not collect data for the purpose of assessing a school's SY 2019-20 charter goals and academic achievement expectations.² DC PCSB will not report on or consider SY 2019-20 goal attainment in charter review and renewal reports.

Amendments to the PMF as Goals Policy

Before the outbreak of the current pandemic, DC PCSB staff intended to recommend minor changes to the Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy) to clarify the implementation of the improvement provision to align with historical practice, and to remove outdated language. In addition to these changes, staff is now proposing further clarification regarding how the policy, including the improvement provision, is implemented if a school is not awarded a PMF score in a given year. These changes are summarized below. For the full text of all proposed changes, see the PMF as Goals Policy [board memo](#).

- Clarification regarding how this policy applies if a school is not awarded a PMF score in a given year: In the event a school is not issued a score or tier on the PMF in a given year (meaning DC PCSB issues no PMF score or tier), the PMF score for that year will not be included in the school's standard of review for the relevant review period. The average score required for the standard of review will remain the same, and DC PCSB will use the remaining years in the review period to evaluate the standard.
- Clarification of the Improvement Provision: The DC PCSB Board may exercise its discretion to apply the improvement provision if the School Corporation has demonstrated consistent improvement on overall PMF scores during the most recent three years of the review period. For any year within the review period that DC PCSB issues no PMF score or tier, this year will not be included in the improvement provision for purposes of determining "the most recent three years." For example, if DC PCSB issues no PMF score or tier in SY 2019-20, given the years SY 2018-19 through SY 2021-22, staff would consider improvement from SY 2018-19 to SY 2020-21, then from SY 2020-21 to SY 2021-22.

² Note that DC PCSB may still collect data related to a school's SY 2019-20 charter goals, depending on the nature of the goals. For example, if a school has a goal around financial performance, DC PCSB may still collect financial data as part of its regular financial monitoring, separate and apart from goal assessment.

Charter Reviews and Renewals That Include SY 2019-20

DC PCSB will not include SY 2019-20 data in a school's review or renewal through SY 2024-25 for the purpose of evaluating charter goals and academic achievement expectations. For the purpose of evaluating goal attainment, SY 2019-20 will be treated as a "null" year due to COVID-19 school closures. Data from all remaining years of the review or renewal period will be considered to determine if a school has met its charter goals and academic achievement expectations.

Compliance data,³ Qualitative Site Review (QSR) results, and financial data from SY 2019-20 will be included in review and renewal reports as follows:

- Compliance data during the closure/distance learning period will be considered in the context of the extraordinary circumstances under which schools are operating.
- QSR results for SY 2019-20 will be only from observations taken through early March 2020.
- Financial data during and after the closure/distance learning period will be considered in the context of the extraordinary circumstances under which schools are operating, including the possible need to responsibly spend down reserves to respond to the crisis.

Academic Conditions That Include SY 2019-20

Several schools are currently subject to high-stakes performance conditions (see Attachment A). If a school fails to meet these conditions, it will be required to relinquish its charter. Many other schools are subject to less stringent conditions, which may impose additional reporting or monitoring requirements, for example, but do not carry such high-stakes consequences for failure. The following adjustments apply for schools with academic conditions that will result in the school relinquishing its charter if the conditions are not met. All other conditions will remain unchanged.

1. DC PCSB will not monitor SY 2019-20 conditions. Instead, SY 2019-20 conditions will be applied to SY 2020-21. In addition, to address unforeseen long-term consequences of the current situation, the following discretionary clause will be included for SY 2020-21 and SY 2021-22: "The

³ "Compliance" refers to a school's compliance with the terms of its charter and applicable law, including DC PCSB's annual Compliance Review, compliance with procurement contract requirements, and special education compliance.

DC PCSB Board may, at its discretion, determine that this condition should be waived in SY 2020-21 and SY 2021-22.”

2. If the condition(s) originally ended in SY 2019-20 or SY 2020-21, the condition(s) will not be extended for an additional year beyond SY 2020-21.

Other Policies and Actions That Are Impacted:

- **Annual Report**
 - Further guidance will be released with SY 2019-20 Annual Report Guidelines at DC PCSB’s May 2020 Board Meeting.

- **Attendance and Discipline Collection, Validation, and Reporting**
 - Attendance: DC PCSB will follow OSSE guidance regarding which days are considered instructional days in SY 2019-20. DC PCSB will only request for schools to submit attendance data for days on which OSSE has specified that attendance data are required. In turn, DC PCSB may be required to report validated attendance data publicly in non-accountability reports, such as in the South Capitol Street Truancy Report and the Annual Discipline and Attendance Report to the DC Council. However, DC PCSB will not calculate in-seat attendance for the purposes of the PMF or charter goals for SY 2019-20.

 - Discipline: DC PCSB has already completed the collection of discipline data covering incidents from August through February of SY 2019-20. DC PCSB collected data on incidents from the month of March on April 14 through the current discipline submission process. DC PCSB does not expect to collect discipline events for days on which schools conducted distance learning unless guidance to the contrary is received from an outside agency such as the DC Council or OSSE. If schools re-open prior to the end of SY 2019-20, then DC PCSB will collect discipline data for the remainder of the year as scheduled. If schools do not re-open, then DC PCSB will not collect discipline data after the March collection is completed. Schools will still have the opportunity to review and validate their discipline data with DC PCSB in July 2020. In August 2020, DC PCSB will share validated student-level discipline data for SY 2019-20 with OSSE for schools that have not opted out of the data share. However, DC PCSB will not calculate discipline rates for the purposes of SY 2019-20 charter goals.

- **Attendance and Truancy Policy**
 - DC PCSB will not issue Notices of Concern if a school surpasses the truancy threshold during Spring 2020, because that school will not have the opportunity to cure the issue and have the notice lifted. However, DC PCSB will use data available through mid-March to identify schools that pass the threshold. Schools that surpass the threshold will receive a formal notification from DC PCSB's Chief School Performance Officer explaining that they passed the truancy threshold for SY 2019-20 and asking them to explain how they intend to reduce truancy during SY 2020-21. DC PCSB will resume normal implementation of this policy in SY 2020-21.

- **Criteria for Determining Schools in Good Standing Policy**
 - DC PCSB staff will use the SY 2018-19 PMF score to determine if a school is in good standing according to this policy until the next publication of the School Quality Reports (anticipated in fall of 2021 for SY 2020-21). All other indicators assessed to determine a school's good standing status under this policy (e.g., compliance) will be based on the most recent data available.

- **Data and Document Submission and Verification Policy**
 - During the COVID-19 extended school closure, DC PCSB staff will relax procedures around issuing Early Warning Notices due to untimely data and document submissions. DC PCSB will, prior to issuing an Early Warning Notice, have at least two individualized touchpoints about the late submission with relevant school staff and the LEA's Executive Director. If, after those two touchpoints, the school is still unresponsive, DC PCSB staff will move forward with an Early Warning Notice. Once an Early Warning Notice has been issued, all other procedures outlined under the policy remain in place (e.g., Out of Compliance). While DC PCSB may recommend a school receive a Notice of Concern due to untimely data and document submission under the policy, such a recommendation would only be made in extreme circumstances during this period of extended school closure (e.g., no communication from the school after multiple rounds of outreach). DC PCSB will resume normal implementation of the Data and Document Submission and Verification Policy when schools resume normal operations.

- **Enrollment Ceiling Increase (ECI) Policy**
 - Per DC PCSB's ECI Policy, schools are eligible for an increase based on the most recent data available. For ECI requests submitted in SY

2020-21, DC PCSB will use SY 2018-19 data to assess performance (Indicator A) and PARCC (Indicator 8). DC PCSB will use data from the most recent year where it is available and complete (including notice of concern, Financial Audit Review, years of operation, Compliance Review, accreditation, audited enrollment, and re-enrollment). For exclusionary discipline (Indicators 9 and 10), DC PCSB will use the better of a) SY 2018-19 data or b) data from SY 2019-20 as collected through the end of February 2020.

- Given ECI eligibility in SY 2020-21 will be partially based on SY 2018-19 data, should a school that is not eligible based on Indicator A (academic performance) seek an ECI during SY 2020-21, the school may submit, along with its charter amendment request, a rationale for why it believes new information should be considered in DC PCSB's analysis of Indicator A. DC PCSB staff will then consider this rationale in its recommendation to the DC PCSB Board, and the Board may consider that information in its vote.
- Normal implementation of the ECI Policy will resume in SY 2021-22.
- **High School Graduation Requirements Approval Process Policy**
 - DC PCSB will honor changes to the graduation requirements listed in the DC Municipal Regulations made by the State Board of Education and/or OSSE. Schools may continue to grant individual waivers consistent with DC PCSB policy and their charter agreements, and DC PCSB's [policy](#) regarding the granting of competency-based waivers through a charter amendment.
- **LEA Document Submission SY 2019-20**
 - Fiscal Year 2021 Budget
 - The current deadline has been extended until July 1, 2020.
 - Monthly and Quarterly Financials
 - Monthly and Quarterly financials are expected to be submitted on time.
 - Board Meeting Minutes – 3rd Quarter and 4th Quarter
 - Schools will submit on the regular schedule.
- **LEA Document Submission SY 2020-21**
 - Further guidance will be released along with the LEA Document Submission Calendar at DC PCSB's May 2020 Board Meeting.

- **Open Enrollment Policy**
 - DC PCSB will use its discretion before issuing a Mystery Caller Notice of Concern for a school that has failed per the initiative. Schools are expected to continue to comply with the Open Enrollment Policy during this period.

- **Qualitative Site Review (QSR)**
 - DC PCSB will postpone QSR observations that were scheduled between mid-March and June of 2020. These visits will be conducted at the start of SY 2020-21, and the observations will be included in SY 2020-21 review and renewal reports.

- **Transcript Audit Policy**
 - The spring 2020 12th grade transcript audits may be conducted virtually and will be in accordance with the “High School Graduation Requirements Approval Process Policy” described above. 9th grade transcript audits will not be conducted for SY 2019-20.

- **Financial Analysis Report (FAR)**
 - DC PCSB will not make any changes to the metrics, floors, or targets on the 2020 FAR. However, DC PCSB’s observations for each school on the 2020 FAR will consider and incorporate the impact of COVID-19 on the school’s financial position, including the need to responsibly spend down reserves to respond to the crisis.

Attachments

Attachment A: School-Specific Conditions (enclosed)

Attachment B: COVID-19 Impact Policy

ATTACHMENT A: School-Specific Conditions

Current conditions and proposed change:

Schools with Conditions	Current Condition	Proposed Condition
Achievement Preparatory Academy PCS Elementary School	SY 2019-20: Must earn a 45 on the PMF	SY 2020-21: Must earn a 45 on the PMF *Board may exercise discretion for SY 2020-21
Harmony DC PCS	SY 2019-20 and SY 2020-21: Must earn a 45 on the PMF	SY 2020-21: Must earn a 45 on the PMF *Board may exercise discretion for SY 2020-21
IDEA PCS	SY 2019-20: Must earn a 47 on PMF or 3-STAR rating SY 2020-21: Must earn a 49 on the PMF or a 3-STAR rating SY 2021-22: Must earn a 50 on the PMF or a 3-STAR rating	SY 2020-21: The school must either <ul style="list-style-type: none"> ▪ Earn a 47 on the PMF or ▪ Earn a 3-STAR rating SY 2021-22: The school must either <ul style="list-style-type: none"> ▪ Earn a 49 on the PMF or ▪ Earn a 3-STAR rating *Board may exercise discretion in both SY 2020-21 and SY 2021-22
Maya Angelou PCS	SY 2019-20 and SY 2020-21: Both campuses must meet at least 50% of goals	SY 2020-21: Both campuses must meet at least 50% of goals *Board may exercise discretion for SY 2020-21
Monument Academy PCS	SY 2019-20 through SY 2023-24 (annually): School must meet two of the following three: Earn 50 or higher on NWEA MAP Math Growth, earn 50 or higher on NWEA MAP Reading growth, earn ISA rate of 88.0 or higher	SY 2020-21 through SY 2023-24: No change to current condition language * Board may exercise discretion in both SY 2020-21 and SY 2021-22

*Paul PCS's 20-year charter review vote was postponed. The Board will vote on the review and any potential conditions at its May 2020 board meeting.