



POLICY TITLE: COVID-19 Impact Policy	
ADOPTION/EFFECTIVE DATE:	Adopted: May 19, 2020 Updated: December 14, 2020

**Purpose of this Revision**

The COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs in March 2020. The DC Public Charter School Board (DC PCSB) adopted this policy to clearly articulate changes in the implementation of policies and practices impacted by the pandemic for the remainder of school year (SY) 2019-20. This revision describes the changes to DC PCSB’s oversight and accountability practices for SY 2020-21. The most significant change is that the School Quality Report (also known as the Performance Management Framework, or PMF) for SY 2020-21 will not be scored or tiered and the information will be displayed without floors and targets. Data related to charter goals *will* be collected for SY 2020-21, but goal attainment will not be assessed in charter review and renewal reports for SY 2020-21.

DC PCSB will continue to monitor 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 high-stakes accountability decisions. For SY 2020-21, DC PCSB will continue to adjust implementation of certain existing policies and practices, while the implementation of others will return to normal, as outlined below.

**POLICY<sup>1</sup>**

**Charter Goals**

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

SY 2020-21: DC PCSB will collect data for a school’s SY 2020-21 charter goals and academic achievement expectations but will not use the data to evaluate goal attainment (e.g., met/not met). DC PCSB will display the data for school’s goals in the review and renewal reports for SY 2020-21 and the data may be

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<sup>1</sup> 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.

<sup>3</sup> DC PCSB may impose word and/or character limits on any such narrative or context and reserves the right to reject narrative that is inaccurate or misleading.



used by the Board as discretionary evidence, but only if it helps the school. DC PCSB will include relevant written narrative and context from the school (submitted for the 2020-21 School Quality Reports) when 2020-21 goal data is publicly reported.<sup>3</sup>

- Schools will not be penalized for failure to report on goals data that is unavailable or impractical due to public health conditions.
- For charter goals that define eligibility based in part on enrollment for the Full Academic Year (FAY) – an attribute defined by OSSE based on the state assessment windows – DC PCSB will collect outcomes for all audited students continuously enrolled through May 1, 2021 (along with any additional eligibility details specified in the charter agreement) should the state definition of FAY be unavailable for any reason.

### **PMF Policy & Technical Guide (PMF Guide)**

SY 2019-20: DC PCSB will cease collection, aggregation, and publication of academic data for school year (SY) 2019-20 and will not produce a School Quality Report (also known as the Performance Management Framework, or PMF) for SY 2019-20.

SY 2020-21: DC PCSB will publish a School Quality Report scorecard with available display data (e.g., student achievement, attendance, etc.) and include sector-level comparisons when possible. In the spring of 2021, DC PCSB will engage schools and other stakeholders to determine which data will be used and how it will be displayed to finalize the SY 2020-21 PMF Policy and Technical Guide. The PMF will not display floor and target ranges for any measure. On the scorecard, there will be an opportunity for each local education agency to provide additional narrative about the school year.

Data points that have historically been display only on the PMF (e.g., PK and K-2 literacy and math measures, mission specific measures) will be optional for schools to both submit and display on the scorecards.

### **Charter Reviews and Renewals That Include SY 2019-20 and SY 2020-21**

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.

SY 2020-21: DC PCSB will display charter goal rates and data but will indicate that goal attainment cannot be determined for this year due to disruption caused by the COVID-19 pandemic. DC PCSB will work with schools individually to identify goals data that cannot be collected due to the pandemic (e.g.,

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goals related to home visits or parent/student gatherings at the school). As noted above, goals data for SY 2020-21 may be considered by the DC PCSB Board, at its discretion, as supplemental evidence of the school's performance, but only if such consideration benefits the school.<sup>4</sup>

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<sup>5</sup> and financial data from SY 2019-20 and SY 2020-21 will be included in review and renewal reports as follows:

- SY 2019-20: Compliance data during the closure/distance learning period will be considered in the context of the extraordinary circumstances under which schools are operating.
- SY 2020-21: DC PCSB will return to normal practice regarding compliance data in review and renewal reports.<sup>6</sup>
- SY 2019-20 and SY 2020-21: 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 and 2020-21**

Several schools are currently subject to high-stakes performance conditions; 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. SY 2019-20: 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 DC PCSB Board may, at its discretion, determine that this condition should be waived in SY 2020-21 and/or SY 2021-22."

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<sup>4</sup> See previous footnote.

<sup>5</sup> "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.

<sup>6</sup> DC PCSB considers the context provided by the school in making decisions regarding school compliance as part of the usual process.



- a. 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.
2. SY 2020-21: DC PCSB will not monitor SY 2020-21 conditions. In addition, to address unforeseen long-term consequences of the current situation, the following discretionary clause will be included for SY 2021-22: "The DC PCSB Board may, at its discretion, determine that this condition should be waived in SY 2021-22."

### **Academic Achievement Expectations and/or Goals Amendments**

SY 2019-20: Schools that wish to amend their charter goals must provide DC PCSB a petition for a goals charter revision no later than April 1 prior to the Academic Year in which the proposed changes will be implemented, as stated in each school's charter agreement. Due to the disruption caused by COVID-19 during the typical negotiation period, staff will grant additional time to complete goal negotiations for schools that had initiated the negotiation process prior to April 1. For SY 2020-21 goal changes only, such schools may submit a petition to revise their charter goals by July 31, 2020 for proposed goal changes to take effect for SY 2020-21.

SY 2020-21: Schools that wish to amend their charter goals must provide DC PCSB a petition for a goals charter revision no later than April 1 prior to the Academic Year in which the proposed changes will be implemented, as stated in each school's charter agreement. DC PCSB will follow this timeline as normal.<sup>7</sup>

### **Other Policies and Actions That Are Impacted:**

- **Annual Report**
  - SY 2019-20: Further guidance will be released with SY 2019-20 Annual Report Guidelines at DC PCSB's May 2020 Board Meeting.
  - SY 2020-21: DC PCSB will return to normal practice. Any updates to the annual report will be released with the SY 2020-21 Annual Report Guidelines in the spring of 2021.
- **Attendance and Discipline Collection, Validation, and Reporting**
  - Attendance:
    - SY 2019-20: DC PCSB will follow the Office of the State Superintendent of Education's (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

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<sup>7</sup> Please see DC PCSB's Charter Amendments for Revised Goals and Academic Achievement Expectations Policy for additional timeline considerations.



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.

- SY 2020-21: DC PCSB expects all local education agencies (LEAs) to comply with the Office of the State Superintendent of Education’s (OSSE’s) [SY 2020-21 Attendance Guidance](#)<sup>8</sup>. LEAs are expected to submit attendance data to OSSE by the fifth business day of the following month per the normal requirements of the [DC PCSB Data and Document Submission Policy](#).
- Discipline:
  - SY 2019-20: 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.
  - SY 2020-21: Discipline collection has returned to normal operations for SY 2020-21. LEAs are expected to submit discipline data to DC PCSB by the 14<sup>th</sup> day of the following month per the normal requirements of the [DC PCSB Data and Document Submission Policy](#). Schools should follow OSSE’s guidance<sup>9</sup> regarding the reporting of disciplinary incidents during remote or hybrid learning. DC PCSB is in alignment with OSSE regarding the collection of these new types of disciplinary events.

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<sup>8</sup> OSSE’s [Guidance: Collecting Attendance for the 2020-21 School Year](#)

<sup>9</sup> OSSE’s [LEA Discipline Data Collection Guidance 2020-21 School Year](#)

- **Attendance and Truancy Policy**

- SY 2019-20: 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.

- SY 2020-21: During SY 2020-21, DC PCSB will not issue Notices of Concern if a school surpasses the truancy threshold because of the unknown impact that virtual learning may have on the reliability of attendance data. However, DC PCSB will monitor school attendance and truancy patterns throughout the year. Schools that surpass the threshold for a truancy Notice of Concern will receive a formal notification from DC PCSB's Chief School Performance Officer explaining that they passed the truancy threshold for SY 2020-21. Schools that exhibit unusual attendance patterns may receive an informal communication from DC PCSB staff requesting additional context for the trends and/or the school's plan to address the trends in the future.

- **Criteria for Determining Schools in Good Standing Policy**

- SY 2019-20 and SY 2020-21: DC PCSB staff will use the SY 2018-19 PMF score to determine if a school is in academic good standing according to this policy until the next publication of the School Quality Reports. 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**

- SY 2021-20: 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.

- Per the Data and Document Submission and Verification Policy, schools are required to “resubmit to DC PCSB any documents that have undergone material changes since the received document was reviewed by DC PCSB during the LEA Document Submission Calendar deadline.” This requirement was intended to ensure documents posted in accordance with DC PCSB’s Transparency Policy remained current. For the remainder of SY 2019-20, schools will not be required to resubmit revised documents to DC PCSB, but should, however, update documents publicly posted on their own platforms.
- SY 2020-21: DC PCSB will resume normal implementation of the Data and Document Submission and Verification Policy for SY 2020-21
- **Enrollment Ceiling Increase (ECI) Policy**
  - SY 2019-20: 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. Minimum criteria for consideration of an ECI are outlined in the ECI Policy.<sup>10</sup>
  - 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, along with supplemental evidence (e.g., externally validated assessment data), for why it believes it would have met Indicator A during SY 2019-20. 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.
  - SY 2020-21: DC PCSB will release updated guidance regarding implementation of the ECI Policy for SY 2021-22 in spring 2021.

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<sup>10</sup> DC PCSB’s Enrollment Ceiling increase Policy can be found here: <https://dcpccb.org/enrollment-ceiling-increase-policy>.

- **Financial Analysis Report (FAR)**

- SY 2019-20: 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.
- SY 2020-21: DC PCSB's FAR observations for each school on the 2021 FAR will continue to 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. DC PCSB staff will open the FY 2021 FAR Technical Guide for public comment this winter.

- **High School Graduation Requirements Approval Process Policy**

- SY 2019-20 and SY 2020-21: 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](#)<sup>11</sup> 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 – 3<sup>rd</sup> Quarter and 4<sup>th</sup> Quarter
    - Schools will submit on the regular schedule.
- SY 2020-21: DC PCSB will return to normal practice. Schools will follow the SY 2020-21 [LEA Document Submission Calendar](#) read into record at DC PCSB's May 2020 Board Meeting.

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<sup>11</sup> High School Graduation Requirements Approval Process Policy: [https://dcpcsb.org/sites/default/files/2018-04-23-HS-Grad-Policy-Revised\\_Redacted.pdf](https://dcpcsb.org/sites/default/files/2018-04-23-HS-Grad-Policy-Revised_Redacted.pdf)





- **Open Enrollment Policy**

- SY 2019-20: 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.
- SY 2020-21: DC PCSB will resume normal oversight activities related to monitoring open enrollment.

- **Qualitative Site Review (QSR)**

- SY 2019-20: 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.
- SY 2020-21: The QSR process and results for SY 2020-21 will follow the [2020-21 QSR Protocol](#).<sup>12</sup> All school visits will be conducted remotely; DC PCSB will not score the remote observations. Pending updated health guidance, DC PCSB may resume in-person observations during SY 2020-21.

- **Transcript Audit Policy**

- SY 2019-20: The spring 2020 12<sup>th</sup> 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.
- SY 2020-21: The spring 2021 12<sup>th</sup> grade transcript audits may be conducted virtually and will be in accordance with the High School Graduation Requirements Approval Process Policy described above and the Transcript Audit Policy. 9th grade transcript audits will be conducted for SY 2020-21.

**Board Approval Acknowledged By:**

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<sup>12</sup> [SY 2020-21 QSR Protocol](#)



DC PCSB Board Chair

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