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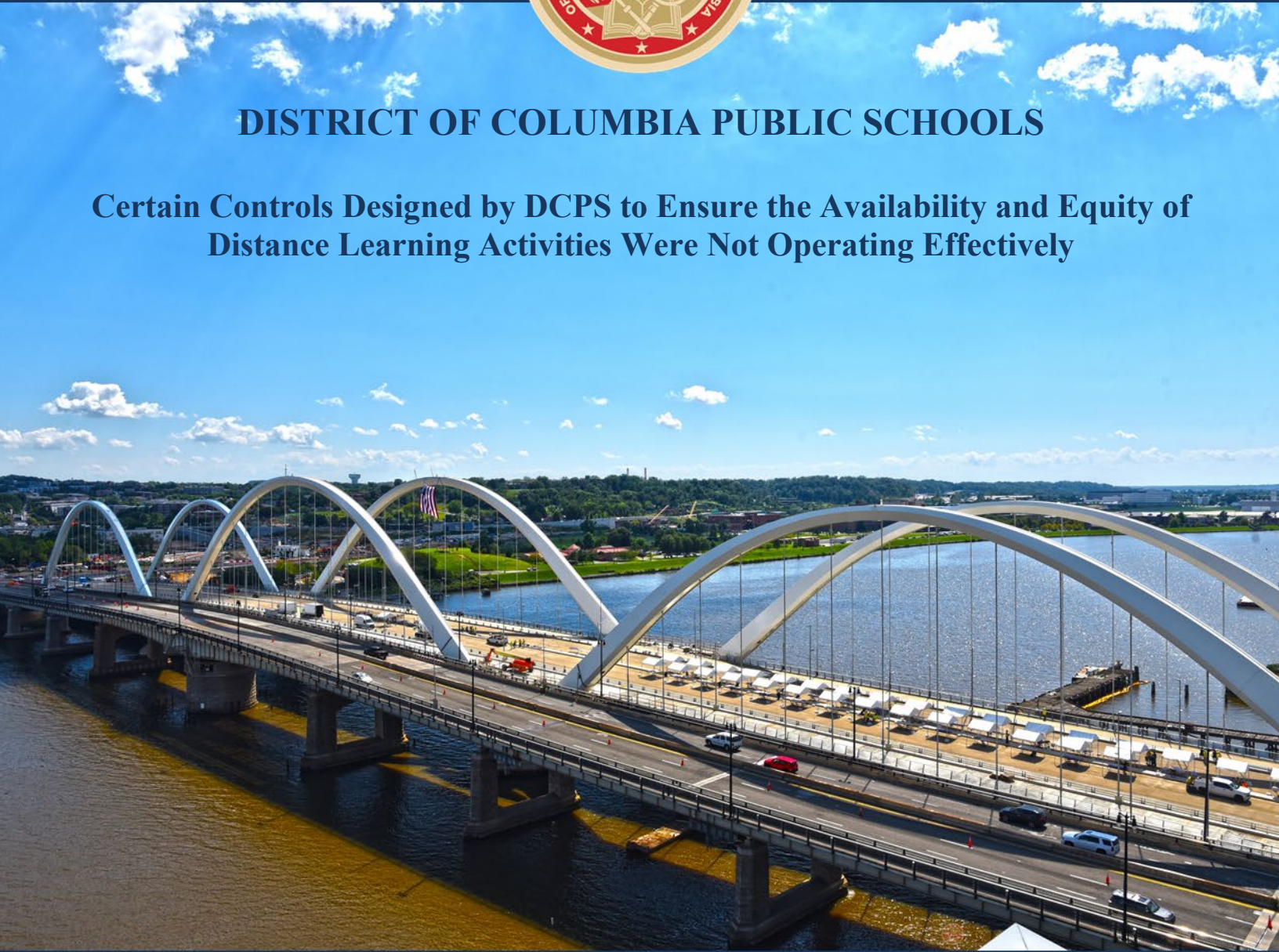
DISTRICT OF COLUMBIA PUBLIC SCHOOLS

Certain Controls Designed by DCPS to Ensure the Availability and Equity of Distance Learning Activities Were Not Operating Effectively

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Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

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- promote economy, efficiency, effectiveness, and accountability;

- inform stakeholders about issues relating to District programs and operations; and

- recommend and track the implementation of corrective actions.

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Certain Controls Designed by DCPS to Ensure the Availability and Equity of Distance Learning Activities Were Not Operating Effectively

Executive Summary

WHY WE DID THIS AUDIT

The D.C. Office of the Inspector General (OIG) identified this engagement due to the inherent risks in implementing a new program during an emergency and the potential ramifications if the program does not meet its intended goals. On March 13, 2020, the District of Columbia Public Schools (DCPS) modified its operations to help mitigate the spread of COVID-19 in the D.C. region by implementing Distance Learning (synonymous with remote learning) in the spring of 2020, which continued through the school year (SY) 2020-2021. This audit focused on whether students' educational needs were met based on the students' access to public education, technology, the learning management system, engagement activities, live instruction, and student-facing equity programs during Terms 1 and 2 of SY 2020-2021.

OBJECTIVES

The objectives of this audit were to determine the: (1) availability and (2) equity of the Distance Learning Program in meeting the educational needs of students in the District.

WHAT WE FOUND

Like other school systems across the country, DCPS faced challenges that required DCPS to change how it conducted operations during the COVID-19 pandemic. DCPS leaders and staff worked hard to change policies, procedures, and practices to adapt to the unpredictable evolving environment. Some of DCPS' successes in this regard include: moving DCPS' entire operations to virtual status in a very short period; significant curriculum changes; deploying technology devices on an unprecedented scale; and instituting flexible policies to monitor and encourage student attendance. DCPS staff, families, and students demonstrated considerable strength and resiliency in response to the unprecedented crisis. DCPS' organizational structure and its ability to recruit and retain administrators and educators contributed to its successes.

Notwithstanding DCPS' efforts to fully transform to a virtual learning environment, there were challenges in ensuring students had timely and consistent access to technology, the Learning Management System (LMS), live instruction, and interactions with teachers during Terms 1 and 2 of SY 2020-2021. We found that:

- At least 3,272 students did not have access to technology and were chronically absent, as these students missed learning opportunities for more than 10 days during Terms 1 and 2.

Executive Summary

- Twenty-three (23) students enrolled in the Inspiring Youth Program (IYP) missed all 89 school days during Terms 1 and 2 due to a lack of access to technology. IYP serves students detained in the Central Detention Facility and the Correctional Treatment Facility.

- DCPS recorded 4,214 students per day (on average) as present, when the students did not log into LMS as required by DCPS attendance policy.

- DCPS retroactively corrected 39,768 attendance records, after the required fifteen (15) business days submission deadline.

DCPS' practice of allowing instructional superintendents to monitor attendance records, technology-issue resolution, and student authentication and engagement contributed to its inability to timely and consistently identify, intervene, and resolve student access to public education issues during SY 2020-2021. As a result, students were not afforded equitable access to remote learning activities; may have missed learning opportunities; and may have experienced achievement gaps.

WHAT WE RECOMMEND

We made 17 recommendations to DCPS to improve the availability and equity of its Distance Learning Program. Our assessment of DCPS' administration of Distance Learning activities provides insight for needed improvements to address technology and inventory process deficiencies, student achievement gaps, virtual attendance shortcomings, and stalled progress toward DCPS' equity goal.

MANAGEMENT RESPONSE

DCPS agreed with 6 recommendations, partially agreed with 6 recommendations, and disagreed with 5 recommendations.

July 21, 2022

Dr. Lewis D. Ferebee
Chancellor
District of Columbia Public Schools
1200 First Street, N.E.
Washington, D.C. 20002

Dear Dr. Ferebee:

Enclosed is our final report, *District of Columbia Public Schools: Certain Controls Designed by DCPS to Ensure the Availability and Equity of Distance Learning Activities Were Not Operating Effectively* (OIG Project No. 21-1-02GA). Our audit objectives were to determine the: (1) availability and (2) equity of the Distance Learning Program in meeting the educational needs of students in the District. The audit was included in our *Fiscal Year (FY) 2021 Audit and Inspection Plan*. We conducted this audit in accordance with generally accepted government auditing standards (GAGAS).

We provided the District of Columbia Public Schools (DCPS) with our draft report on June 9, 2022, and received its response on June 24, 2022. We appreciate that DCPS officials began addressing some of the findings immediately upon notification during the audit.

Our draft report included 17 recommendations to DCPS for actions we deemed necessary to correct identified deficiencies. DCPS agreed with recommendations 5, 8, 10, 12, 14, and 16. Therefore, we consider these recommendations resolved but open pending evidence of stated actions. DCPS partially agreed with recommendations 1, 2, 3, 4, 7, and 17, but DCPS' actions taken and/or planned are responsive and meet the intent of the recommendations. Therefore, we consider these recommendations resolved but open pending evidence of stated actions.

Although DCPS disagreed with recommendations 11 and 15, actions taken and/or planned are responsive and met the intent of the recommendations. Therefore, we consider these recommendations resolved and open pending evidence of stated actions. DCPS also disagreed with recommendations 6, 9, and 13. We consider these recommendations open and unresolved. For recommendations 6 and 13, DCPS stated there were policy changes but has not provided copies of the policy changes for our review. For recommendation 9, DCPS stated in the instances of systemic technology challenges, DCPS swiftly takes action to remedy the challenge. As presented in this report, it took 7 months for DCPS to correct attendance records in some cases. Therefore, we request that DCPS reconsider its position and provide additional responses to recommendations 6, 9, and 13 within 30 days of the date of this final report.

Chancellor Ferebee
Controls to Ensure the Availability and Equity of Distance
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During the audit, we received DCPS' views on our findings, recommendations, and conclusion in writing. We incorporated DCPS' views in our draft report if supported by sufficient and appropriate evidence. DCPS' June 24, 2022, response did not provide additional evidence to support its disagreement with recommendations 6, 9, and 13. Based on DCPS' response, we re-examined our facts and conclusions and determined that the draft report is fairly presented. DCPS' responses to the draft report are included in their entirety at Appendix D.

We appreciate the cooperation and courtesies extended to our staff during this audit. If you have any questions concerning this report, please contact me or Fekede Gindaba, Assistant Inspector General for Audits at (202) 727-2540.

Sincerely,

Daniel W. Lucas
Inspector General

DWL/caw

Enclosure

cc: See Distribution List

Chancellor Ferebee
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BACKGROUND

The District of Columbia Public Schools' (DCPS) vision is that "every student feels loved, challenged, and prepared to positively influence society and thrive in life".[1] DCPS' mission is to ensure that every school guarantees students reach their full potential through rigorous and joyful learning experiences provided in a nurturing environment.[2] For School Year (SY) 2020-2021, the District allocated a DCPS operating budget of approximately $1.1 billion[3] to fund 117 public schools with nearly 50,000 students enrolled.

On March 13, 2020, DCPS modified its operations to help mitigate the spread of COVID-19 in the D.C. region by implementing Distance Learning (synonymous with remote learning) in the spring of 2020,[4] which continued through SY 2020-2021 for most students.[5]

Distance Learning occurs when the student is not physically present in person in a traditional classroom environment.[6] To implement online Distance Learning, DCPS, in coordination with the Office of the Chief Technology Officer (OCTO), implemented a plan in place to distribute technology to all DCPS students that needed a device. DCPS used multiple online platforms to provide Distance Learning for DCPS students during SY 2020-2021: Canvas as its web-based learning management system (LMS); Microsoft Office 365; Microsoft Teams to conduct live instruction; Aspen, the Student Information System for attendance and grades; and an asset management inventory software application to track technology devices distributed to DCPS students.

The audit objectives were to determine the: (1) availability and (2) equity[7] of the Distance Learning Program in meeting the educational needs of students in the District. We conducted our audit from December 2020 to December 2021 in accordance with generally accepted government auditing standards (GAGAS).

We used federal and District laws and regulations, and DCPS policies and procedures to examine the availability and equity of the Distance Learning Program in meeting the educational needs of District students. In addition, we used the *United States Government Accountability (GAO) Office Standards for Internal Control in the Federal Government* (Green Book)[8] to evaluate the design and implementation of DCPS' control activities to ensure the availability and equity of the Distance Learning are efficient and effective, and comply with applicable laws and regulations.

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[1] DCPS website https://dcps.dc.gov/page/about-dcps (last visited Aug. 17, 2020).
[2] *Id.*
[3] GOV'T OF THE DISTRICT OF COLUMBIA, FY 2021 APPROVED BUDGET AND FINANCIAL PLAN VOL. 3 AGENCY BUDGET CHAPTERS PART II, DISTRICT OF COLUMBIA PUBLIC SCHOOLS D-65.
[4] Letter from Lewis D. Ferebee, E.D., Chancellor to the DC Public Schools Community, dated Mar. 13, 2020, https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/DCPS_SchoolClosure_031320_Final_Englishv2.pdf (last visited Aug. 24, 2020).
[5] Certain students were offered in-person learning during Terms 3 and 4 of SY 2020-2021.
[6] *See* Office of the State Superintendent of Education SY 2020-21 LEA Continuous Education & School Recovery Plans: Application Questions (OSSE SY 2020-21 LEA Application).
[7] Equity at DCPS means eliminating opportunity gaps, interrupting institutional bias, and removing barriers to academic and social success.
[8] U.S. GOV'T ACCOUNTABILITY OFFICE, GAO-14-704G, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, (Sept. 2014), https://www.gao.gov/products/GAO-14-704G. (last visited June 9, 2021).

Control activities are a component of an internal control system, and the Green Book defines an internal control system as "a continuous built-in component of operations, effected by people, that provides reasonable assurance, not absolute assurance, that an entity's objectives will be achieved."[9]

Further, the Green Book explains that: "[m]anagement is directly responsible for all activities of an entity, including the design, implementation, and operating effectiveness of an entity's internal control system."[10] In addition to the federal government, GAO also recommends that state, local, and quasi-governmental entities follow these internal control standards.

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[9] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8 § OV1.04 at 5.
[10] *Id*. § OV2.14 at 11-12.

FINDINGS

DCPS DESIGNED CONTROLS TO ENSURE THE AVAILABILITY AND EQUITY OF DISTANCE LEARNING ACTIVITIES

According to the Green Book:

> A direct relationship exists among an entity's objectives, the … internal control[s], and the organizational structure of an entity. Objectives are what an entity wants to achieve. The … internal control[s] are what are required of the entity to achieve the objectives. Organizational structure encompasses the operating units, operational processes, and other structures management uses to achieve the objectives.[11]

We found that, consistent with the Green Book principles, DCPS designed and published (1) strategic objectives as part of its fiscal year 2021 performance plan, (2) an organizational structure to achieve its strategic objectives, and (3) control activities.[12] Below we discuss DCPS' strategic objectives, organizational structure, and control activities in detail.

DCPS Designed and Published Strategic Objectives as Part of Its Fiscal Year 2021 Performance Plan

DCPS published six strategic objectives as part of its fiscal year (FY) 2021 performance plan. The strategic objectives were:

- Promote Equity: Define, understand, and promote equity so that we eliminate opportunity gaps and systematically interrupt institutional bias.

- Empower our People: Recruit, develop, and retain a talented, caring, and diverse team.

- Ensure Excellent Schools: Increase the number of excellent schools throughout the city.

- Educate the Whole Child: Provide rigorous, joyful, and inclusive academic and social emotional learning experiences to ensure all students are college and career ready.

- Engage Families: Ensure communication and deepen partnerships with families and the community.

- Create and maintain a highly efficient, transparent, and responsive District government.

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[11] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8 § OV2.10 at 9-10.
[12] The Green Book defines control activities as "policies, procedures, techniques, and mechanisms that enforce management's directives to achieve the entity's objectives and address related risks." *Id.* Principle 10.02.

DCPS Designed and Published an Organizational Structure to Achieve Its Strategic Objectives

As set forth in the agency's organizational chart and FY 2021 approved budget book, DCPS is organized into a Core Leadership Team and 12 offices. The Core Leadership Team is responsible for fund management, oversight, and centralized administration for the school district. Each of the 12 offices is represented within the Core Leadership Team. The following are the offices that we directly worked with during the audit:

- Office of the Chief of Staff – keeps DCPS focused on its strategic goals by using research, analysis, and robust data to drive planning, direct funding to support key initiatives, hold the organization accountable for getting results, and enhance communication.

- Office of the Deputy Chancellors – there are two Deputy Chancellors responsible for providing oversight and management of day-to-day operations. The Deputy Chancellors oversee 10 Clusters, each led by an Instructional Superintendent, and principals that are responsible for the day-to-day operations of 117 schools.

- Office of Teaching and Learning – provides rich and engaging curriculum, deepens, and strengthens content knowledge for teachers, selects and supports appropriate assessments, and puts in place specialized programmatic supports, interventions, and enrichments to meet all student needs.

- Office of School Improvement and Supports – creates the conditions for innovation and systems improvement to align resources, operations, talent equitably, and design to best meet the needs of our schools.

- Office of Data Systems and Strategy – ensures DCPS has the data, systems, and technology infrastructure to enable change in every school across the District.

- Office of Operations – ensures that schools and offices have the operational systems and supports they need to be excellent.

- Office of the General Counsel – responsible for all legal affairs of the organization.

According to DCPS officials,

> An important strength of DCPS is its Cluster Support Model. While schools were always assigned to groups known as clusters led by an Instructional Superintendent, for SY 2019-2020, DCPS instituted a District-wide approach toward achieving more equitable outcomes in alignment with our strategic plan, known as the Capital Commitment. DCPS allocated additional funding toward realigning key Central Office supports around 10 clusters. Through this model, DCPS provides each cluster with dedicated staff support in the following key areas: academics, data, attendance, operations, special education, and education technology. This team's purpose is to support the Instructional Superintendent in

analyzing data and targeting supports to reduce opportunity gaps and disproportionate outcomes for students in their cohort of schools, in alignment with each school's Comprehensive Support Plan (CSP), which is a framework used annually to use data to drive improvement.

DCPS Designed Control Activities to Minimize Risks Related to the Availability and Equity of Distance Learning Activities

According to the Green Book, control activities are the policies, procedures, techniques, and mechanisms that are designed to achieve the entity's objectives and address related risks.[13]

What follows is a sample of the control activities DCPS designed to meet the educational needs of District students by ensuring the availability and equity of Distance Learning activities.

- Designed grade-specific instruction plans and provided digitized curriculum via the online platform, Canvas.

- Created on-demand self-paced training modules for teachers, students, and families to learn skills on how to use the platforms and applications for instruction and learning activities.

- Published DCPS Reopen Strong – Virtual Attendance Guidance.

- Developed Staff-Student Videoconferencing Guidance.

- Issued the DCPS Student and Staff Technology and Network Acceptable Use Policy.

- Established Attendance Intervention Requirements.

- Provided dedicated support staff who worked with schools to support technology use and solve related problems at the school level.

- Procured an additional 26,773 technology devices with built-in wi-fi capability.

- Increased the availability of centralized technical assistance to students and families by setting up a 24/7 student and family technology help desk and developing additional online support resources.

The following sections of this report discuss our findings, recommendations, and conclusions where certain controls that were intended to meet the educational needs of District students by ensuring the availability and equity of Distance Learning activities were not operating effectively.

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[13] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8.

CERTAIN CONTROLS DESIGNED BY DCPS TO ENSURE THE AVAILABILITY AND EQUITY OF DISTANCE LEARNING ACTIVITIES WERE NOT OPERATING EFFECTIVELY

DCPS experienced challenges ensuring students had timely and consistent access to public education, including access to technology, LMS, live instruction, and interactions with teachers during SY 2020-2021. Also, DCPS did not always track attendance and engagement to ensure all students were fully authenticated and participated in teaching and learning activities during remote school sessions as the Office of the State Superintendent of Education's (OSSE) guidance recommends.

Below we discuss DCPS' challenges in detail.

DCPS Did Not Always Resolve Issues Timely for Students that Lacked Access to Technology

According to DCPS policy,[14] individual schools are required to follow up within 24 hours with families who reported technology issues to ensure that all families have received their requested devices and can access the LMS. We found at least 3,272 students who did not access technology for days, weeks, or months after notifying schools of their technology issues during Terms 1 and 2 of SY 2020-2021.

According to DCPS officials, "DCPS experienced significant supply chain delays and pandemic-related labor challenges which slowed technology distribution." Additionally, DCPS "aligned resources and support across all stakeholders ensuring student technology needs were met as swiftly as possible."

To assess the extent and impact of the lack of access to technology on student learning outcomes, we asked DCPS officials how DCPS identified barriers to students' success. DCPS officials stated, "[r]esearch show[s] that students with less than 90 percent attendance are more likely to have lower test scores and not graduate from high school . . . ." A student is chronically absent when a student misses 10 percent or more of the school year, including both excused and unexcused absences.[15] DCPS excused a student's absence when they reported experiencing a technology issue.

According to DCPS' Reopen Strong – Virtual Attendance Guidance (dated August 21, 2020), "[s]tudents who do not log [into] Canvas[16] will be recorded as absent for the day." We noted that at least 15,342 students did not log into Canvas due to lack of access to technology during Terms 1 and 2. Using 90 percent as a baseline, we calculated that 3,272 of 15,342 students experienced a lack of access to technology for 10 or more days. Therefore, these students should be considered chronically absent because they missed more than 10 percent of 89 school days.[17]

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[14] D.C. PUBLIC SCHOOLS, CONFIRMED VIRTUAL PRESENCE (Undated).
[15] 5A DCMR § 2199.
[16] Canvas is the web-based LMS, used by DCPS, in which educators can create online courses for students.
[17] During Terms 1 and 2 of SY 2020-2021, there were 89 school days in total. Therefore, for a student to be chronically absent the student would have missed more than 10 percent of 89 days, which is more than 9 days.

The remaining 12,070 of the 15,342 students experienced a lack of access to technology for fewer than 10 days. These students should not be considered chronically absent because they had not missed more than 10 percent of 89 (see Figure 1). Figure 2 is a heatmap that shows chronic absences by Wards.[18]

Figure 1: Analysis of Students without Access to Technology
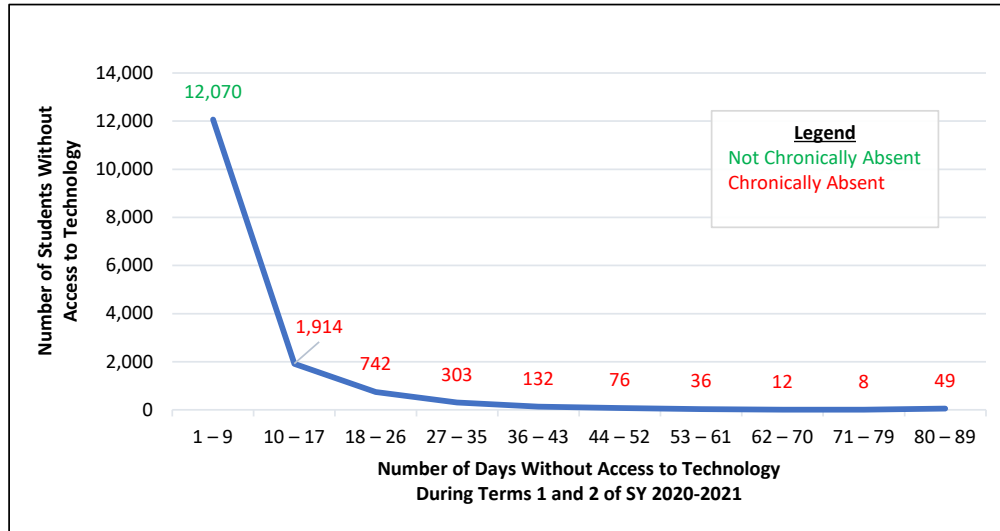
Source: OIG Analysis of DCPS' attendance record.

Figure 2: Geographic Distribution of Chronically Absent Students Due to the Lack of Access to Technology
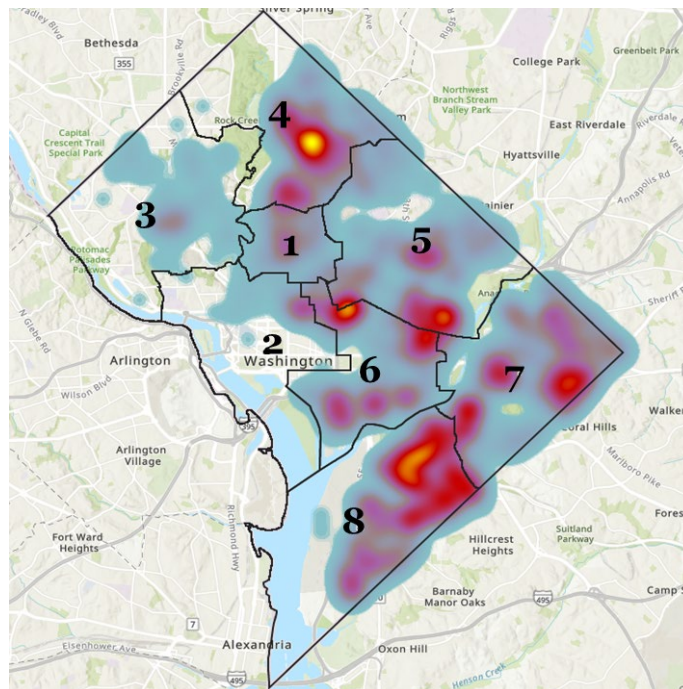
Source: OIG Analysis of DCPS' attendance record.

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[18] See Table 1 of this Report for the methodology and underlying data used to create Figure 2.

Although individual schools reported to DCPS daily that these students were experiencing a lack of access to technology, DCPS did not always timely resolve technology issues for certain students.

We also noted that 49 students enrolled in the Inspiring Youth Program (IYP)[19] missed 10 or more school days, and 23 students missed all 89 school days during Terms 1 and 2 due to lack of access to technology. DCPS, however, marked these 23 students present for the entirety of both terms.

According to DCPS officials,

> Supporting [the IYP] student learning environment during the pandemic was uniquely challenging due to four factors: 1) A 23-hour per day lockdown restriction was imposed by the Department of Corrections (DOC) to prevent pandemic-related contagion; 2) Restrictions were and remain in place that prevent access to certain technology due to security concerns; 3) student-specific restrictions can occur at any point in time, as determined by DOC, based on safety assessments; and 4) IYP students are not compulsory attendance age and can refuse instruction.

DCPS officials acknowledged that they relied on the OCTO helpdesk and individual schools to resolve all students' access to technology issues. DCPS' practice of allowing individual schools to update the official attendance record and self-monitor technology-issue resolution resulted in DCPS' inability to identify, intervene, and resolve access-to-technology issues and may have adversely impacted students' learning outcomes.

We recommend that the DCPS Chancellor:

1. Establish a procedure to identify all students who missed more than 10 percent of SY 2020-2021 due to a lack of access to technology.

2. Develop a plan to address any adverse impact on student academic achievement due to lack of access to technology identified as part of Recommendation 1.

DCPS Did Not Enforce Its Device Distribution Policy to Ensure Students Had Access to Distance Learning

According to DCPS policy,[20] each school was required to develop a comprehensive device distribution plan to identify students' device requirements and address their needs no later than October 1, 2020. Our review of DCPS device distribution records indicated that DCPS distributed 2,471 devices to students between October 2, 2020, and December 4, 2020, beyond its established initial distribution deadline.

According to DCPS officials, "DCPS experienced significant supply chain delays and pandemic-related labor challenges which slowed technology distribution." Additionally, DCPS "align[ed]

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[19] IYP serves students detained in the Central Detention Facility and the Correctional Treatment Facility.
[20] D.C. Public Schools, Student Device Distribution Guidance -- SY 20-21 (updated Sept. 17, 2020).

resources and support across all stakeholders ensuring student technology needs were met as swiftly as possible."

DCPS officials acknowledged that not all students had a device at the beginning of the school year as planned. Due to unreliable device distribution records, DCPS could not perform meaningful analyses to ensure students had received devices on time. As a result, students were not afforded equitable access to remote learning activities; may have missed learning opportunities; and may have experienced achievement gaps.

We recommend that the DCPS Chancellor:

3. Establish a procedure to track and maintain reliable device distribution records to perform meaningful analyses.

4. Establish a procedure to identify all students who did not receive a device by October 1, 2020.

5. Develop a plan to identify and address any achievement gaps for students identified as part of Recommendation 4.

DCPS Marked Some Students Present Even though the Student Was Not Logged Into the LMS as Required by Policy

According to DCPS' Reopen Strong – Virtual Attendance Guidance (dated August 21, 2020), "[s]tudents who do not log [into] Canvas will be recorded as absent for the day." However, DCPS recorded 4,214 students per day (on average) as present, even though they did not log into Canvas as required.

According to DCPS officials, "[e]arly in SY 2020-21, a policy change was made to include Teams activity in the DCPS definition of daily attendance . . . ." However, DCPS did not provide any formal documentation to support this policy change.

We attribute this condition to DCPS' failure to enforce its virtual attendance policy. Enforcing the virtual attendance policy by requiring students to log into Canvas each day would have allowed students to perform course activities, such as reviewing learning resources, completing assignments, and obtaining written feedback from teachers. DCPS also could have established the impact of student absences on their academic achievement and identified any learning loss.[21] DCPS' practice of marking some students present even though they had not logged into Canvas may have inflated the attendance rate by 11.7 percent for Terms 1 and 2 of SY 2020-2021.

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[21] We use the term *learning loss* to refer to any reversals in academic progress due to discontinuities in a student's education.

We recommend that the DCPS Chancellor:

6. Develop a method to identify students who did not log into the LMS during SY 2020-2021 and mark them absent as DCPS policy required, unless their absences were excused.

7. Establish a procedure to compare the students identified as part of Recommendation 6 to student achievement data to determine any learning loss resulting from not completing course activities in the LMS.

8. Implement a plan to address any learning loss for students identified as part of Recommendation 7.

DCPS Did Not Timely Correct Attendance Records[22] as Required

Title 5-A DCMR § 2101.7(b) states that DCPS must "[s]ubmit corrected attendance records via an automated, electronic feed, or such other format; and provide any corrections to attendance records within fifteen (15) business days of submission ...."[23] However, DCPS failed to correct 7,116 attendance errors for 1,567 students weeks after the original submission during Terms 1 and 2 of SY 2020-2021. For 810 students, 3,120 records indicated that these students were both present and absent on the same day. These students should have been marked present or absent, but not both.

One DCPS official stated that "[a]ttendance data and student interventions are tracked in the DCPS Data Analysis Center (DDAC), which is available to both District and school-level teams. [DDAC] is a dashboard that is updated daily with a running attendance average, daily attendance, compliance with interventions and related metrics. School and central office staff monitor these metrics to monitor attendance trends and to determine where additional student interventions are needed." Another DCPS official, responsible for the oversight of the Attendance Team, acknowledged the attendance errors found on the DDAC and stated that the instructional superintendents[24] should have worked with the schools to correct the attendance errors.

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[22] Aspen is the Student Information System to maintain official attendance records.

[23] OSSE Final Rulemaking, 68 D.C. Reg. 2076, 2082-2083 (Feb. 19, 2021).

[24] During the audit period, there were 10 instructional superintendents. These superintendents are responsible for "provid[ing] principals with feedback, coaching, guidance, and support necessary for them to be effective school leaders — with a particular focus on instructional leadership. They help principals develop their staff's capacity to reach student achievement goals and build positive relationships with their communities, while ensuring their schools are well-run, nurturing places of learning." D.C. PUBLIC SCHOOLS, ORGANIZATION CHART FY 2020 at 7 and 8, dated Nov. 2019, https://dcps.dc.gov/publication/dcps-organizational-chart (last visited Nov. 4, 2020).

DCPS officials also provided the following written explanations:

> When issues were identified with the nightly Canvas files, DCPS worked with Canvas to ensure access to the most accurate and complete activity data possible, to be able to make retroactive attendance corrections as needed. For Term 1 and Term 2, these corrections happened on May 14, 2021, and June 16, 2021.
>
> Two factors may have resulted in attendance updates after the 15-day window:
>
> o Batch uploads of corrections due to a data feed error, which required extensive work with [DCPS'] LMS vendor to implement.
>
> o Challenges families experienced related to submitting documentation virtually. DCPS worked with families to address these technology challenges.

However, DCPS did not provide evidence for our review indicating that the attendance errors flagged on the DDAC were corrected on May 14, 2021, and June 16, 2021. We observed that the attendance errors tab on the DDAC has since been removed in its entirety.

Without such evidence, DCPS did not have reasonable assurance that students' attendance records were complete and accurate and did not assess whether the attendance errors had adverse impacts on students' learning outcomes.

We recommend that the DCPS Chancellor:

9. Develop a procedure to ensure corrections to attendance records are made within fifteen (15) business days of submission as Title 5-A DCMR § 2101.7(b) requires.

10. Develop procedures to track and maintain all evidence of correcting attendance records retroactively.

DCPS Did Not Maintain Accurate, Complete, and Reliable Daily Attendance Records for Some Students

Title 5-A DCMR § 2101.1 states that "[e]ach educational institution operating in the District of Columbia shall maintain an accurate, contemporaneous, and daily attendance record for each student who is enrolled in or who attends the educational institution."[25]

However, we noted that DCPS did not maintain accurate, complete, and reliable daily attendance records for students in the LMS. Instead, DCPS retroactively corrected 39,768 attendance records weeks and months after the original submission. According to OSSE guidance, DCPS should have authenticated the students' presence and provided evidence of engagement when the student failed to log into Canvas.

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[25] OSSE Final Rulemaking, 68 D.C. Reg. 2076, 2079 (Feb. 19, 2021).

According to OSSE's *Guidance: Collecting Attendance for the 2020-21 School Year*, DCPS must make one-on-one contact with a student for the day to authenticate their presence and provide daily evidence of engagement when students fail to log into the LMS. Without authenticating student presence and providing proof of engagement, DCPS could not assure attendance records were accurate, complete, and reliable.

We recommend that the DCPS Chancellor:

11. Develop a method to identify student attendance errors retroactively corrected without authenticating student presence and providing proof of engagement.

12. Implement a plan to assess whether a lack of authenticating student presence and providing proof of engagement had adverse impacts on students' learning outcomes.

13. Develop procedures to maintain all evidence of authentication and engagement before correcting attendance records when a student does not log into the LMS as required by OSSE's guidance.

DCPS Did Not Consider Tracking Student Attendance During Live Instruction

According to DCPS' Reopen Strong – Virtual Attendance Guidance (dated August 21, 2020), "[w]hile it is important that students are engaging with their teacher during live instruction, attendance will not be taken at the course level."

DCPS did not consider tracking attendance at the course level and did not mark a student absent when the student was not in attendance at expected periods of live instruction. When asked to provide the OIG with a list of students who missed live instruction, DCPS officials stated, "there is no[ ] consistent record available to report on attendance in classes held as Teams meetings (i.e., video conferencing)." Tracking attendance for live instruction would have helped DCPS: (1) identify students who did not consistently attend the live classes; (2) measure student learning outcomes; and (3) establish a list of at-risk students for targeted intervention.

We discussed the lack of attendance tracking during live instruction with DCPS officials, who stated that their policy was intended to be flexible and the least punitive toward the students. DCPS acknowledged it was too late to modify the existing virtual attendance policy for SY 2020-2021, but it would consider revising the attendance policy in the future. Subsequently, DCPS changed its virtual attendance policy by requiring attendance tracking during live instruction for SY 2021-2022 as follows:

> Student attendance will be recorded in Aspen by the student's teacher based on whether the student is present for the synchronous course. Students will be asked to either turn on their cameras and verbally acknowledge their "presence" during roll call or verbally respond to an attendance request to verify their presence.[26]

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[26] D.C. PUBLIC SCHOOLS, ATTENDANCE AND TRUANCY POLICY: SCHOOL YEAR 2021-22 (Aug. 30, 2021).

As a result, during SY 2020-2021, DCPS could not determine the number of students that did not consistently attend live instruction or the impact not attending live instruction had on students' learning outcomes.

We recommend that the DCPS Chancellor:

14. Develop a plan to address any adverse impact students' absence from live instruction had on their academic achievement.

DCPS Could Not Contact Some Students Who Were Not Re-Enrolled in SY 2020-2021

According to OSSE, "District law makes education compulsory, and a failure to send a child to school can be a sign of neglect. Further, it is critical to account for a child's whereabouts when they are expected to be in school."[27]

DCPS' process for removing or withdrawing a student from membership from an educational institution identified 2,550 students who were expected to re-enroll but did not for SY 2020-2021. During this audit, DCPS could not contact or provide information regarding the whereabouts of 644 of the 2,550 students. Without contacting these students and obtaining supporting enrollment documentation in another educational institution, DCPS could not assure that those students had access to education during SY 2020-2021.

DCPS officials stated, and provided support documentation that shows, "DCPS can account for all 644 students," as of March 4, 2022. The document shows 35 students are actively participating in school again, and 163 students graduated. The remainder (446) did not return to DCPS for unknown reasons.

We recommend that the DCPS Chancellor:

15. Establish a procedure to identify students who did not re-enroll in DCPS during SY 2020-2021 and make a reasonable effort to ensure they are continuing their education.

DCPS EXPERIENCED CHALLENGES IN PROMOTING AND ACHIEVING EQUITY FOR STUDENTS DURING SY 2020-2021

According to the Green Book, management sets objectives to meet the entity's mission, strategic plan, goals, and requirements of applicable laws and regulations.[28] DCPS' strategic plan[29] contains strategic priorities, one of which is to promote equity by eliminating opportunity gaps and interrupting institutional bias. To promote equity and encourage a student's social and emotional learning, DCPS provides student-facing equity programs that target middle school

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[27] OSSE Final Rulemaking, 68 D.C. Reg. 2076, 2077 (Feb. 19, 2021).
[28] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8 § OV2.16 at 12.
[29] A CAPITAL COMMITMENT STRATEGIC PLAN 2017-2022, (Sept. 22, 2017), https://dcps.dc.gov/node/1272671 (last visited Apr. 11, 2022).

students to address its vision of students feeling loved, challenged, and prepared to positively influence society and thrive in life.

As described below, we discuss the weaknesses the OIG identified within DCPS' efforts to promote equity and encourage a student's social and emotional learning.

DCPS Lacks a Comprehensive Plan to Implement, Monitor, and Track Progress Toward Eliminating Opportunity Gaps and Interrupting Institutional Bias

The Green Book states that "[strategic] plans set the goals and objectives for an entity along with the effective and efficient operations necessary to fulfill those objectives."[30] The Green Book goes on to state that "[e]ffective operations produce the intended results from operational processes, while efficient operations do so in a manner that minimizes the waste of resources."[31]

In FY 2017, DCPS made equity one of its strategic priorities and set a 5-year strategic objective to define, understand, and promote equity so that DCPS eliminates opportunity gaps and systematically interrupts institutional bias. To facilitate execution of the strategic plan related to equity, DCPS developed a strategy implementation process that included activities such as: defining a strategy framework; developing an implementation plan; developing a District-wide equity policy; and defining key performance indicators to measure progress toward the strategic objective.

In 2018, DCPS adopted an Equity Framework and defined equity as follows:

> EQUITY DEFINITION: Equity at DCPS means creating an environment in which we eliminate opportunity gaps, interrupt institutional bias, and remove barriers to academic and social success, particularly for students of color. To promote equity, DCPS will provide access, inclusion, and affirmation, offering the most support where the greatest disparities have persisted.

In February 2019, DCPS established a 5-year implementation plan to eliminate opportunity gaps and interrupt institutional bias. The implementation plan was designed to facilitate the execution of DCPS' strategic plan related to equity and provided details for implementation scope, schedule, and budget. The implementation plan also stated that DCPS should develop and implement a District-wide equity policy in 2020. However, in 2019, DCPS changed its implementation approach by changing the formalized strategy implementation process to ad hoc practices.

According to DCPS officials, the implementation plan was reprioritized due to DCPS reorganization activities that reduced the staff within the Office of Equity and redirected dedicated resources. Further, "DCPS internally reorganized in 2019 and shifted from a narrow focus of one team carrying out equity work to a system-wide focus on equity, with the understanding that all DCPS employees needed to share the responsibility and commitment to truly shift outcomes." Without a formalized strategy implementation process, DCPS cannot

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[30] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8, § OV2.19 at 22.
[31] *Id.*

measure progress made towards its strategic objectives related to equity. As a result, through FY 2020, DCPS spent approximately $3 million on staff salaries to eliminate opportunity gaps and interrupt institutional bias without measurable progress.

We recommend that the DCPS Chancellor:

16. Develop a comprehensive plan to implement, monitor, and track progress toward eliminating opportunity gaps and interrupting institutional bias for students.

DCPS Did Not Establish Alternate or Track Prior Performance Targets for Its Student Empowerment and Equity Programs (SEEP)

The purpose of SEEP is to "[provide] resources and supports to schools developing and implementing programs that address the needs and improve the academic and social outcomes for students of color."[32]

Prior to SY 2020-2021, DCPS used In-Seat Attendance, Suspension Rates, PARCC[33] Scores, and Reading Inventory assessments to measure the performance of SEEP. During Terms 1 and 2 of SY 2020-2021, DCPS did not monitor these key performance measures and indicators to evaluate SEEP activities and ensure DCPS achieved its goals related to improving the academic and social outcomes for students of color. We noted low participation in SEEP activities, which DCPS officials attributed to screen fatigue, competing priorities, and the lack of school-based staff supporting the program contributed to low participation.

According to the Green Book, "[m]anagement establishes activities to monitor performance measures and indicators. These may include comparisons and assessments relating different sets of data to one another so that analyses of the relationships can be made and appropriate actions taken."[34] A key component of measuring and evaluating SEEP performance indicators would include analyses to determine why there was low or no participation among certain students of color and developing corrective action plans to increase future program participation.

According to DCPS officials,

> [D]ue to the pandemic and the school system's move to virtual instruction, schools found it difficult to successfully move most of the SEEP activities from face-to-face to a virtual platform and measure impact on outcomes for several reasons. In alignment with other jurisdictions, the data related to in-seat attendance and suspension rates were greatly skewed, as compared to prior years, due to a move to learning at home. The District also did not administer the PARCC during the SY20-21 school year. All of these factors impacted DCPS' ability to implement SEEP activities with fidelity and to evaluate them fairly and effectively using previously selected metrics.

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[32] DISTRICT OF COLUMBIA PUBLIC SCHOOLS PRIORITYSTAT: EQUITY, [SOCIAL EMOTIONAL LEARNING] AND SAFE & POSITIVE SCHOOLS (Feb. 5, 2019).

[33] Partnership for Assessment of Readiness for College and Careers.

[34] U.S. GOV'T ACCOUNTABILITY OFFICE, *supra* note 8, § 10.03 at 47.

DCPS could have used this as an opportunity to expand its SEEP activities to more students across more schools rather than limit it to the few existing schools that previously hosted the in-person, student-facing, equity programs. Additionally, DCPS could have considered modifying metrics for tracking performance in a new environment.

We recommend that the DCPS Chancellor:

17. Establish and implement performance targets for SEEP to periodically measure performance, evaluate performance indicators, and develop corrective action plans to increase program participation for students of color.

CONCLUSION

Like other school systems across the country, DCPS faced challenges that required a transition to an education model for deployment during the pandemic. DCPS moved its entire operations to virtual status in a very short period, made significant curriculum changes, deployed technology devices at an unprecedented scale, and instituted flexible policies to monitor and encourage attendance.

This report discusses DCPS challenges in ensuring students had timely and consistent access to technology during SY 2020-2021. The pandemic made technology a necessity rather than an option for connecting with students and keeping students engaged and focused. The results of this audit create a unique opportunity for DCPS to better understand equity in the context of students' inability to access technological services. Such understanding will help DCPS in developing plans on how to effectively and efficiently address the needs of any students that missed learning opportunities and experienced achievement gaps.

AGENCY RESPONSE AND OFFICE OF THE INSPECTOR GENERAL COMMENTS

We provided the District of Columbia Public Schools (DCPS) with our draft report on June 9, 2022, and received its response on June 24, 2022. We appreciate that DCPS officials began addressing some of the findings immediately upon notification during the audit.

Our draft report included 17 recommendations we made to DCPS for actions we deemed necessary to correct identified deficiencies. DCPS agreed with recommendations 5, 8, 10, 12, 14, and 16. Therefore, we consider these recommendations resolved but open pending evidence of stated actions. DCPS partially agreed with recommendations 1, 2, 3, 4, 7, and 17, but DCPS' actions taken and/or planned are responsive and meet the intent of the recommendations. Therefore, we consider these recommendations resolved but open pending evidence of stated actions.

Although DCPS disagreed with recommendations 11 and 15, actions taken and/or planned are responsive and met the intent of the recommendations. Therefore, we consider these recommendations resolved and open pending evidence of stated actions. DCPS also disagreed

with recommendations 6, 9, and 13. We consider these recommendations open and unresolved. For recommendations 6 and 13, DCPS stated there were policy changes but has not provided copies of the policy changes for our review. For recommendation 9, DCPS stated in the instances of systemic technology challenges, DCPS swiftly takes action to remedy the challenge. As presented in this report, it took 7 months for DCPS to correct attendance records in some cases.

ACTIONS REQUIRED

We request that DCPS reconsider its position and provide additional responses to recommendations 6, 9, and 13 within 30 days of the date of this final report.

Appendix A. Objectives, Scope, and Methodology

We conducted this performance audit from December 2020 to December 2021 in accordance with GAGAS standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of this audit were to determine the (1) availability and (2) equity of the Distance Learning Program in meeting the educational needs of students in the District. The audit was included in the OIG's *FY 2021 Audit and Inspection Plan.* We issued the engagement letter on September 16, 2020; however, DCPS expressed concerns with the auditors' access to educational data and systems containing student information. As a result, the OIG and DCPS executed an Educational Data Access and Use Agreement on November 30, 2020.

We used DCPS' newly developed, ad hoc guidance documents for the Distance Learning Program to determine how available and equitable DCPS made education for students during Terms 1 and 2 of SY 2020-2021. We reviewed the District of Columbia Municipal Regulations (DCMR) updates that applied retroactively to remote learning during SY 2020-2021. We also examined the underlying data supporting the performance metrics that DCPS asserted demonstrates whether public education was made available and provided equitably to all students.

We obtained an understanding of DCPS' Distance Learning activities, management oversight functions, and controls by conducting interviews with DCPS officials. The OIG auditors obtained training and access for the Canvas, Aspen, Teams, and DDAC systems. We also obtained and analyzed technology inventory, survey, attendance, and enrollment data. Further, we obtained, reviewed, and analyzed management reports related to device distribution, technology resolution, attendance, enrollment, and student achievement.

We assessed the following risk factors related to the Distance Learning activities:

- Identifying and addressing students' lack of access to technology.
- Ensuring students consistently logged into the LMS to perform course activities; such as reviewing learning resources, completing assignments, obtaining written feedback from teachers, and tracking learning progress.
- Maintaining accurate and complete attendance records.
- Authenticating students' presence and providing evidence of engagement.
- Tracking and addressing students who did not consistently attend live instruction.
- Promoting equity to eliminate opportunity gaps and interrupt institutional bias.

We assessed the validity and reliability of computer-processed data and performed limited existence and completeness tests to verify the accuracy of the data. We determined that the data were sufficiently reliable for this report.

Finally, we created a heatmap and performed other analytical procedures to determine the geographic concentration of students with technology issues resulting in chronic absence. There was a total of 47,291 students enrolled[35] in DCPS during Terms 1 and 2 of SY 2020-2021. Of those, 3,272 were absent from schools for 10 or more days during the audit period. We excluded 379 students from the 3,272 due to 130 students being incarcerated, and 249 students did not have exact DC addresses. As a result, we calculated 2,893 students who had technology issues and were chronically absent as presented in Table 1 and Figure 2 of this Report.

Table 1: Summary of the Chronically Absent Students by Ward Due to the Lack of Access to Technology

Ward	Total Number of Enrolled Students A	Total Number of Chronically Absent Students B	Percentage of Chronically Absent Students C=B/A
Ward 1	4,932	103	2.09%
Ward 2	1,783	82	4.60%
Ward 3	5,195	66	1.27%
Ward 4	8,507	453	5.33%
Ward 5	5,243	407	7.76%
Ward 6	3,908	281	7.19%
Ward 7	8,308	654	7.87%
Ward 8	9,415	847	9.00%
Total	**47,291**	**2,893**	

Source: OIG Analysis of DCPS' attendance record.

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[35] This total includes students enrolled and whose Ward information could be located.

Appendix B. Acronyms and Abbreviations

CVP	Confirmed Virtual Presence
COVID-19	Coronavirus 2019
DC	District of Columbia
DCMR	District of Columbia Municipal Regulations
DCPS	District of Columbia Public Schools
DDAC	DCPS Data Analysis Center
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
GAO	United States Government Accountability Office
Green Book	GAO Standards for Internal Control in the Federal Government
IYP	Inspiring Youth Program
LMS	Learning Management System
OCTO	Office of the Chief Technology Officer
OIG	Office of the Inspector General
OSSE	Office of the State Superintendent of Education
PARCC	Partnership for Assessment of Readiness for College and Careers
SEEP	Student Empowerment and Equity Programming
SY	School Year

Appendix C. Table of Recommendations

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
DCPS	1. Establish a procedure to identify all students who missed more than 10 percent of SY 2020-2021 due to lack of access to technology.		Agreed in Part
DCPS	2. Develop a plan to address any adverse impact on student academic achievement due to lack of access to technology identified as part of Recommendation 1.		Agreed in Part
DCPS	3. Establish a procedure to track and maintain reliable device distribution records to perform meaningful analyses.		Agreed in Part
DCPS	4. Establish a procedure to identify all students who did not receive a device by October 1, 2020.		Agreed in Part
DCPS	5. Develop a plan to identify and address any achievement gaps for students identified as part of Recommendation 4.		Agreed
DCPS	6. Develop a method to identify students who did not log in to the LMS during SY 2020-2021 and mark them absent as DCPS policy required, unless their absences were excused.		Disagreed
DCPS	7. Establish a procedure to compare the students identified as part of Recommendation 6 to student achievement data to determine any learning loss resulting from not completing course activities in the LMS.		Agreed in Part
DCPS	8. Implement a plan to address any learning loss for students identified as part of Recommendation 7.		Agreed

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
DCPS	9. Develop a procedure to ensure corrections to attendance records are made within fifteen (15) business days of submission as Title 5-A DCMR § 2101.7(b) requires.		Disagreed
DCPS	10. Develop procedures to track and maintain all evidence of correcting attendance records retroactively.		Agreed
DCPS	11. Develop a method to identify student attendance errors retroactively corrected without authenticating student presence and providing proof of engagement.		Disagreed
DCPS	12. Implement a plan to assess whether a lack of authenticating student presence and providing proof of engagement had adverse impacts on students' learning outcomes.		Agreed
DCPS	13. Develop procedures to maintain all evidence of authentication and engagement before correcting attendance records when a student does not log into the LMS as required by OSSE's guidance.		Disagreed
DCPS	14. Develop a plan to address any adverse impact students' absence from live instruction had on their academic achievements.		Agreed
DCPS	15. Establish a procedure to identify students who did not re-enroll in DCPS during SY 2020-2021 and make a reasonable effort to ensure they are continuing their education.		Disagreed

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
DCPS	16. Develop a comprehensive plan to implement, monitor, and track progress toward eliminating opportunity gaps and interrupting institutional bias for students.	$3 million	Agreed
DCPS	17. Establish and implement performance targets for SEEP to periodically measure performance, evaluate performance indicators, and develop corrective action plans to increase program participation for students of color.		Agreed in Part

Appendix D. DCPS Response to Draft Report

DISTRICT OF COLUMBIA
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Office of the Chancellor

VIA EMAIL

June 24, 2022

Daniel W. Lucas
Inspector General
717 14th Street, N.W.
Washington, D.C. 20005

Dear Inspector General Lucas:

The District of Columbia Public Schools (DCPS) is in receipt of your June 9, 2022 draft audit report entitled *District of Columbia Public Schools: Certain Controls Designed by DCPS to Ensure the Availability and Equity of Distance Learning Activities Were Not Operating Effectively*, OIG Project No. 21-1-02GA. Thank you for conducting this audit and providing your opinion as well as allowing us the opportunity to respond and provide feedback.

DCPS continues to be committed to ensuring that all students receive a well-rounded educational experience, and feel loved, challenged and prepared while attending our schools. We believe that our response to the need to completely modify our educational environment to effectuate the changes necessary during the COVID-19 public health emergency demonstrates our commitment to our students and their families, as well as our staff's fortitude and resilience. Like every other school system across the country, DCPS faced challenges as we quickly pivoted to develop, stand-up and simultaneously implement a remote learning environment. I firmly believe that our response to the pandemic has been robust and comprehensive, placing students first. Our agency's responses to your recommendations are detailed below.

OIG RECOMMENDATIONS and DCPS RESPONSES

Recommendation 1:
Establish a procedure to identify all students who missed more than 10 percent of SY 2020-2021 due to a lack of access to technology.

DCPS Response:
DCPS partially agrees with this recommendation and implementation has been in progress throughout summer 2021 and the current school year, as outlined below.

When faced with the pandemic, DCPS embarked on a highly successful effort to shift its entire operational framework to virtual status in a very short period of time. DCPS made significant curriculum changes, deployed devices at an unprecedented scale, and created new operational policies to safeguard students and continue instruction. As the context of the pandemic shifted, our agency adapted its practice accordingly, keeping students at the center. An example of such a shift relates to the fact that while initially the system's attendance process was anchored in logging on to Canvas, DCPS' Learning

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Management System (LMS), this process was modified once the Microsoft Teams platform was established and students were also able to participate in live classes. In essence, DCPS adjusted attendance taking procedures to include participation in live classes via Microsoft Teams to account for the multiple ways that students were accessing instruction.

With the onset of the pandemic, DCPS recognized that many students would need devices to learn virtually. Leveraging Mayor Bowser's three-year digital equity plan for DCPS, the Empowered Learners Initiative (ELi)[1], which was already in its first year, DCPS strategically blended funding and worked closely with technology partners like the Office of the Chief Technology Officer (OCTO), Microsoft, and local business entities to purchase, prepare, and distribute devices to students while building a comprehensive virtual learning environment through robust systems, infrastructure, and support channels. DCPS effectively accelerated the launch of its ELi plan, moving from three years to one to address student needs. Our schools and Central Office staff worked long hours to provide the highest quality of teaching and learning possible continued under challenging circumstances.

DCPS would like to address the report's opening framing regarding the lack of technology in the Inspiring Youth Program (IYP), and DCPS' efforts during the pandemic. IYP has never been a technology-based program, and pre-COVID had almost no technical components, due to Department of Corrections (DOC) security restrictions. All students attending IYP are over 18 years old and have the right to refuse instruction. Throughout the pandemic, DCPS worked diligently to provide a cohort of teachers in the IYP units who regularly provided instruction as feasible, and this team included the Instructional Superintendent. DCPS also worked actively with partners at DOC to provide students with allowable access to technology. By Term 2 of school year (SY) 2020-2021, DCPS was using tablets with most IYP students who were not under DOC restriction.

In total, DCPS invested $35 million in technology for SY 2020-2021. Specific to this timeframe, DCPS successfully purchased an additional 26,773 LTE-enabled devices (the widely used wireless connection standard for high speed) in preparation for SY 2020-2021. DCPS sustained its technology investment for the current year and will continue to do so moving forward.

By launching a successful student technology survey in summer of 2020 that received over 38,000 responses, DCPS was able to identify and meet the technology and connectivity needs of students, including investing over $5 million in providing mobile LTE internet connectivity (through mobile hotspots and LTE-enabled devices) to students at home.

In the beginning of SY 2020-2021, DCPS performed daily needs assessments to review inventory and device needs and support device distribution and preparation as new needs were identified. DCPS continued these daily needs assessments until all schools' identified needs were addressed. DCPS and OCTO also held weekly calls with school technology controllers to address questions and provide support. These calls are ongoing to this day. DCPS and OCTO also significantly increased the availability of centralized technical assistance to students and families in preparation for SY 2020-2021 such as setting up a 24/7 student and family technology help desk and additional online support resources.

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[1] https://dcps.dc.gov/page/empowered-learners-initiative-eli-0

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It is also important to note that during the pandemic, students and their families faced multiple challenges that impacted attendance. Whether a student was absent from a virtual or in-person class, DCPS remained steadfast in our efforts to immediately identify and address the specific challenge faced. Our team worked vigilantly to support attendance while also providing important flexibilities as permitted and approved by the Office of the State Superintendent of Education (OSSE) for all Local Education Agencies (LEAs).

DCPS recognized the importance of regular communications with families when students missed class. Staff used the following approaches to contact families: personal phone calls, wellness checks, school-initiated automated calls, texting, emailing, social media touchpoints, emergency contact outreach, and a myriad of other mechanisms to support their students' safety and wellbeing.

In addition, DCPS expanded wellness checks for students not attending class. These protocols included escalation via e-mail from the school to the Central Services Attendance Team after 10 consecutive days of outreach, detailing the dates, times and methods of outreach attempts, sending "We Miss You" postcards to families on day 10, and school attendance team consultation with the Central Services Attendance Specialist to discuss the potential need for a Child and Family Services Administration (CFSA) referral.

Further, and similar to other jurisdictions, DCPS created a policy that allowed students experiencing technology difficulties, either through device challenges or internet challenges, to be accounted for through the use of a code named "Confirmed Virtual Presence" (CVP). In these instances, families were required to contact the school to share the challenge in order for the school to utilize this code. The school was expected to denote the cause of the challenge in the student's Aspen[2] notes and provide support with make-up work.

To support systemic recovery and student learning acceleration, DCPS also developed a Continuous Education Plan (CEP)[3] in August 2021 which outlined the multi-faceted ways in which DCPS would assess and address learning loss for students facing challenges. This plan met state-level requirements established by OSSE and federal requirements related to the American Rescue Plan Elementary and Secondary Emergency Relief Act (ARP-ESSER).

Further, during SY 2020-2021, DCPS piloted and implemented a nationally recognized, research-based Multi-Tiered Systems of Support (MTSS) framework[4] to address student learning needs. This pilot informed a district-wide rollout of MTSS for SY 2021-2022. MTSS supports students by using data to holistically analyze their strengths and needs across key domains (academics, attendance, behavior). This analysis supports tailored interventions based on level and area of student need.

Additionally, as articulated in the CEP, DCPS is strategically using federal funding to support accelerated learning for students most impacted by the pandemic. Beginning Summer 2021 and continuing into SY 2021-2022, DCPS strategically allocated a total of $26 million in Elementary and Secondary School Emergency Relief (ESSER) II funding directly to schools to support acceleration programming for students

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[2] Aspen is the official system of record for student attendance.
[3] DCPS' CEP can be found here.
[4] https://www.air.org/our-work/education/multi-tiered-system-supports-formerly-rti

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most impacted by the pandemic, with a goal of addressing disproportionate impact and ensuring learning recovery for students most at risk. This funding supported Summer Acceleration Academies, School Year Acceleration Academies, High Impact Tutoring, and other tiered supports for students. We will continue to utilize ESSER funds and MTSS to support acceleration in SY 2022-2023.

Last, DCPS leverages its Comprehensive School Plan (CSP) process to develop annual school-specific improvement priorities and success measures based on student data. This practice will also continue.

Recommendation 2:
Develop a plan to address any adverse impact on student academic achievement due to lack of access to technology identified as part of Recommendation 1.

DCPS Response:
DCPS partially agrees with this recommendation due to the point in time finding. We note that implementation has been in progress since the summer of 2021 and in the current school year.

As explained in our response to recommendation 1, DCPS developed a CEP[5] in August 2021 which outlined multiple ways in which student learning loss would be assessed and addressed. Our CEP met OSSE's state-level and federal requirements related to ARP-ESSER. Also as noted, DCPS allocated over $26 million in federal relief funding to support school-specific acceleration in Summer 2021 and SY2021-2022 for students whose learning was disrupted by the pandemic and implemented the MTSS framework at all schools in Fall 2021. DCPS also continues to leverage its CSP planning process to guarantee every school has a data-driven continuous improvement plan as articulated above.

Recommendation 3:
Establish a procedure to track and maintain reliable device distribution records to perform meaningful analyses.

DCPS Response:
DCPS partially agrees with this recommendation and implementation is in progress. While DCPS has a system-wide asset management system in place as detailed below, DCPS continues to refine policies and practices related to the management of device distribution across our school portfolio.

In 2018, DCPS transitioned from decentralized information technology (IT) asset management to a central management and oversight model by implementing a comprehensive, central asset management system known as TIPWeb. As the sole system of records for DCPS IT assets, TIPWeb allows schools and central office to better maintain and track the District's technology assets. Schools are mandated to regularly update each device's information, including its location, to which student or staff the device is assigned, and the condition of the device. Use of this system also enables central office to review each school's technology inventory, which helps with replenishing the inventory in timely fashion. Further, as a component of the Eli, every DCPS school has appointed at least one staff member to the "technology controller" role who receives a stipend in exchange for overseeing technology assets within their school.

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[5] *Ibid.*

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As noted above, DCPS utilized a system of daily device needs assessment in TIPWeb for all schools at the beginning of the school year, and DCPS continues to hold standing weekly meetings with these individuals and OCTO staff to provide ongoing support of the school's technology. As indicated previously, DCPS and OCTO have established a multi-faceted network of technical supports for students and staff including a student and family technical call center, internal instructional application-specific staff service desks, 85 on-site technicians, and instructional and IT asset management cluster support personnel to assist with support efforts and problem resolution.

Recommendation 4:
Establish a procedure to identify all students who did not receive a device by October 1.

DCPS Response:
DCPS partially agrees with this recommendation. As noted in our response to Recommendation 1, DCPS successfully purchased 26,773 devices with built-in internet connectivity (LTE) in preparation for SY 2020-2021, in addition to the 18,000 that were purchased and distributed during SY 2019-2020. Initially, DCPS encountered significant pandemic related supply chain delays similar to jurisdictions nationwide; however, all schools received needed devices by September 28, 2020, and DCPS continues to maintain a sufficient inventory of within-life-cycle devices. DCPS also continues to centrally maintain contingency devices, to meet schools' needs as quickly as possible, in the event of loss or damage to existing devices.

Further, DCPS notes that it cannot be concluded that students who did not receive a device by October 1, 2020 did not have access to technology, as a significant number of students opted initially to use personal devices and may have received a DCPS device at a later point in time.

DCPS will also continue to collaborate closely with our partners at OCTO to support schools, students, and families, leveraging many of the expanded strategies developed in response to the pandemic described above. We strongly believe that these shifts demonstrate swift and adaptive District government coordination in support of DCPS students and families, and we continue to refine our practices annually to meet student needs.

Recommendation 5:
Develop a plan to identify and address any achievement gaps for students identified as part of Recommendation 4.

DCPS Response:
DCPS agrees with this recommendation and implementation is in progress, as noted in our response to Recommendation 1. In addition to addressing the impacts of the pandemic on learning as detailed prior, our team also worked tirelessly to provide supports that were responsive to the whole family's needs above and beyond their students' education. These supports included the provision of meals, enhanced mental health support, and other resources for students and families experiencing significant, destabilizing loss.

We continue to implement and refine MTSS, which provides whole-child support. We are also continuing our intensive acceleration work throughout Summer 2022 and SY 2022-2023.

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Recommendation 6
Develop a method to identify students who did not log in to the LMS during SY 2020-2021 and mark them absent as DCPS policy required, unless their absence was excused.

DCPS Response:
DCPS disagrees with this recommendation, as DCPS attendance records were updated in alignment with policy. As noted in previous responses, while initially the system's attendance process was anchored in logging on to Canvas, the Learning Management System (LMS), once the Microsoft Teams platform was established and students were also able to participate in live classes, DCPS adjusted attendance taking procedures to include participation in live classes via Microsoft Teams. This shift was important, as it allowed DCPS to account for the multiple ways that students were accessing instruction.

DCPS sends attendance data for all students to OSSE in a feed each night, and DCPS works to ensure that attendance data are timely submitted and maintained as accurate. Doing so requires updating records once new information is received. In the instances where DCPS identified a feed failure, the team immediately worked with our third-party vendor to address and resolve the issue, and OSSE accepted the data corrections.

Recommendation 7:
Establish a procedure to compare the students identified as part of Recommendation 6 to student achievement data to determine any learning loss resulting from not completing course activities in the LMS.

DCPS Response
DCPS partially agrees with this recommendation. As highlighted previously, DCPS developed and submitted a CEP outlining the many ways that learning loss would be assessed and addressed for students impacted by the pandemic. We continue to implement the MTSS framework holistically as we regularly review student academic, behavior, and attendance data. This process helps us identify supports that will help all students continue to succeed, and it assists DCPS in meeting the goal of providing targeted interventions to students with the greatest needs. We will continue this intensive acceleration and MTSS work over the summer and into SY 2022-2023. Additionally, DCPS leverages its CSP process to develop school-specific improvement priorities and success measures based on student data. This practice will also continue.

Recommendation 8:
Implement a plan to address any learning loss for students identified as part of Recommendation 7.

DCPS Response:
DCPS agrees with this recommendation and implementation is in progress. As previously stated, DCPS developed and submitted a CEP which comprehensively outlined the ways in which DCPS would assess and address learning loss for all students impacted by the pandemic, in accordance with state-level requirements established by OSSE. As we continue to implement the MTSS framework, we will also continue our intensive acceleration work over the summer and into SY 2022-2023. As noted above, DCPS will also continue to leverage its CSP process to develop school-specific improvement priorities and success measures based on student data.

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Recommendation 9:
Develop a procedure to ensure corrections to attendance records are made within fifteen (15) business days of submission as Title 5-A DCMR §2101.7(b) requires.

DCPS Response:
DCPS disagrees with this recommendation, as DCPS has processes in place to timely submit daily attendance records and correct errors within 15 days of when they are discovered. In the instance of a systemic technology challenge, DCPS swiftly takes action to remedy the challenge.

As noted above, DCPS sends attendance data for all students to OSSE in a feed each night. DCPS timely submitted and maintained accurate, contemporaneous, and daily attendance records for each student who is enrolled, and updated records once new information was received. Given the daily feed established with OSSE, DCPS is not clear on the basis of this finding and does not believe it is factually accurate. In the instances where DCPS identified a feed failure, the team immediately worked with our third-party vendor to address and resolve the issue, and OSSE accepted the data corrections.

Further, DCPS would also like to address the report's framing regarding attendance errors in relation to the Attendance Continuous Improvement Framework dashboard in the DCPS Data Analysis Center (DDAC). This dashboard does not impact whether students were marked as present or absent for the day. Rather, the framework served an important function during the pandemic to support schools with entering codes according to complex guidance related to students learning virtually, in-person, or a combination of modalities.

Many coding flags were removed before the final end of year data finalization in June 2021 as coding was reconciled. This is an annual year end process. Additionally, DCPS refined the attendance dashboard's error codes as part of an annual planning process for the upcoming school year. In this case, the adjustments incorporated the planned transition back to an in-person context. It is for this reason that the current dashboard does not mirror the dashboard reviewed when the audit began in December 2020.

Recommendation 10:
Develop procedures to track and maintain all evidence of correcting attendance records retroactively.

DCPS Response:
DCPS agrees that procedures should exist to track attendance and implementation is ongoing. All records of absences that are changed or deleted are logged in Aspen as the change is made. The changes are tracked and maintained in Aspen, which is the official system of record for student data.

Recommendation 11:
Develop a method to identify student attendance errors retroactively corrected without authenticating student presence and providing proof of engagement.

DCPS Response:
DCPS disagrees with this recommendation. DCPS implemented an established policy for this timeframe and will continue to implement applicable OSSE guidance as it pertains to tracking attendance.

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Recommendation 12:
Implement a plan to assess whether a lack of authenticating student presence and providing proof of engagement had adverse impacts on students' learning outcomes.

DCPS Response:
DCPS agrees with this recommendation and implementation is in progress. As previously stated, DCPS developed and submitted a CEP which comprehensively outlined the ways in which DCPS would assess and address learning loss for students impacted by the pandemic, in accordance with state-level requirements established by OSSE.

Additionally, all DCPS schools implemented MTSS in SY 2021-2022; MTSS provided the school and district teams with structures to holistically analyze the strengths and needs of students across domains (academics, attendance, behavior) and implement aligned tiered (differentiated) responses. Schools are codifying their school-specific tiered supports and measures of success through their CSPs for SY 2022-2023. As we continue to implement the MTSS framework, we will also continue our intensive acceleration work over the summer and into SY 2022-2023.

Recommendation 13:
Develop procedures to maintain all evidence of authentication and engagement before correcting attendance records when a student does not log into the LMS as required by OSSE's guidance.

DCPS Response:
DCPS disagrees with this recommendation. As noted above, we leveraged available systems and quickly procured Microsoft Teams access for all students and staff. As previously stated, all attendance records for SY 2020-2021 have been updated with the most accurate data from both Canvas and Teams, in accordance with policy adjustments made.

Recommendation 14:
Develop a plan to address any adverse impact students' absence from live instruction had on their academic achievement.

DCPS Response:
DCPS agrees with this recommendation and implementation is in progress. As shared above, during SY 2020-2021, DCPS piloted and implemented the nationally recognized, research based MTSS framework; this pilot informed a District-wide rollout of MTSS for SY 2021-2022. MTSS supports the District and school teams to holistically analyze the strengths and needs of students across domains (academics, attendance, behavior) and implement aligned tiered (differentiated) responses. Using MTSS, schools are able to provide supports for all students, progress monitor their impact, and when needed, provide more intensive supports for subgroups of students.

Recommendation 15:
Establish a procedure to identify students who did not re-enroll in DCPS during SY 2020-2021 and make a reasonable effort to ensure they are continuing their education.

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DCPS Response:

DCPS disagrees with this recommendation as the agency already has such procedures in place, including a robust No-Show Protocol in accordance with OSSE requirements. Further, DCPS actively conducts outreach around re-enrollment in multiple ways as detailed below.

Promoting re-enrollment is part of DCPS' Capital Commitment strategic plan. On an annual basis, DCPS Central Services promotes re-enrollment via metro rail and bus, radio, and bus shelter advertisements. DCPS also sends postcards to families, shares texts, calls, and emails, and reaches out via social media and community listervs. DCPS also leverages My School DC's annual Enrollment Saturday event in April to push re-enrollment. Outreach is generally translated into Amharic, Chinese, French, Spanish, and Vietnamese.

DCPS also collects and shares key data with schools so that schools can strategically align re-enrollment efforts toward any anticipated shifts. DCPS also leverages My School DC's annual Enrollment Saturday event in April to push re-enrollment. Schools are provided with historical re-enrollment data by grade, best practices for re-enrollment, pre-translated communication templates to promote re-enrollment with their families, marketing materials, stipends to support re-enrollment efforts that occur outside of regular school hours, and re-enrollment incentives for families.

For students who are expected to re-enroll but fail to ever attend, and for whom there is no parent/guardian withdrawal, DCPS conducts a rigorous No-Show Protocol. The Protocol consists of direct outreach to families via letters, phone calls, text messages and emails. After DCPS makes every effort to locate students and is unable to locate students or determine their intent, schools are expected to document their efforts within Aspen. It is our understanding that auditors did not review documentation at this level of detail, but we believe that DCPS procedures are in full alignment with OSSE requirements.

DCPS implements District policies and procedures annually in accordance with established law and regulation, and as outlined in OSSE's guidance[6] for local education agencies. DCPS specifically follows OSSE's guidance related to withdrawals of students who do not re-enroll in the next school year and who do not show up based on the established No Show Protocol.

Recommendation 16:

Develop a comprehensive plan to implement, monitor, and track progress toward eliminating opportunity gaps and interrupting institutional bias for students.

DCPS Response:

The implementation of this recommendation is in progress. Equity is a component of our five-year strategic plan entitled the DCPS Capital Commitment.[7] There is a focus on equity across DCPS, which includes offering programming that supports students of color and prioritizing our budget and resources for students who need them most. DCPS internally reorganized in 2019 and shifted from a narrow focus of one team carrying out the equity work to a system-wide focus on equity work, with the understanding that all DCPS employees needed to share the responsibility and commitment to truly shift outcomes.

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[6] https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/SY21_22_EACC_Handbook_Final_06292021.pdf
[7] https://dcps.dc.gov/capitalcommitment

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DCPS continues to boldly lean into its Capital Commitment to close racial gaps in graduation with the intent that all students achieve proficiency in reading and grade-level assessments. DCPS has doubled down on its equity work this past year, supported by internal subject matter experts on our equity team and through significant external partnerships.

This past year, DCPS: (1) launched Anti-Racist Educator University (ARE-U) to support its staff's ability to be culturally responsive; (2) began a series of mandatory anti-bias trainings for school leaders (Principals and Assistant Principals) who evaluate staff; (3) rolled out equity training for all central office managers; and (4) engaged central office directors and above in a Problem of Practice focused on addressing the over-identification of boys of color for special education – emotional disabilities. Additionally, we leveraged the Government Alliance on Race and Equity (GARE) framework to launch a comprehensive policy planning committee which uses a racial equity tool to evaluate current and new policies. Last, we overhauled our central office performance measurement system to specifically include an expectation that our employees approach their work with an equity mindset.

Recommendation 17:
Establish and implement performance targets for SEEP to periodically measure performance, evaluate performance indicators, and develop corrective action plans to increase program participation for students of color.

DCPS Response:
DCPS partially agrees with this recommendation to the extent that the District's Student Empowerment and Equity Programming (SEEP) should continue to have performance measures. However, we disagree with the need to develop corrective action plans. Implementation shifts were made in response to the pandemic, and DCPS has remained focused on executing this work with urgency as detailed below.

SEEP encompasses our suite of student-facing equity initiatives: We the Girls; Educating Males of Color (EMOC); Reign; and Critical Conversations. On average, SEEP directly impacts approximately 1000 students each school year. During SY 2020-2021, due to the pandemic and the school system's move to virtual instruction, schools found it difficult to successfully move most of the SEEP activities from face-to-face to a virtual platform and measure impact on outcomes for several reasons. In alignment with other jurisdictions, the data related to in-seat attendance and suspension rates were greatly skewed, as compared to prior years, due to a move to learning at home. The District also did not administer the Partnership for Assessment of Readiness for College and Careers (PARCC) assessments during SY 2020-2021.

All of these factors impacted DCPS' ability to implement SEEP activities with fidelity and to evaluate them fairly and effectively using previously selected metrics. Despite this pandemic-related challenge, DCPS continues to disaggregate and examine all outcomes by race, ethnicity, gender, and special education/English Language Learner (ELL) status to guide targeted support and improvement planning. DCPS is currently in the process of reassessing its current SEEP and will be updating the metrics used to assess its effectiveness, including academic metrics outside of standardized testing.

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Conclusion

Thank you again for conducting this audit and providing an opportunity to respond to your findings. I am very proud of the stellar efforts of DCPS staff to provide our students with the best possible education and support during the countless challenges faced throughout the COVID-19 public health emergency. I reiterate my belief in the superior quality of DCPS' distance learning system in response to the pandemic.

Sincerely,

Lewis D. Ferebee, Ed.D.
Chancellor

cc: Betsy Cavendish