What’s In the Proposed Fiscal Year 2019 Budget for PreK-12 Education?

By Marlana Wallace

The proposed fiscal year (FY) 2019 budget increases school funding by more than what is necessary to cover the new teacher contract, but still falls short of giving all students the resources they need to succeed. Since the publication of the 2013 DC Education Adequacy Study five years ago, the amount of funding per student has consistently been lower than recommended.1 This year’s increase brings us closer than we have ever been, but we are still $942 per student, or 9 percent, short (Figure 1).

In a year dominated by realizations of the many ways we are failing our students, it’s time to update our understanding of what it really costs to provide a quality education for every student, as well as ensure that every dollar of ‘at-risk’ funding is spent on targeted services for low-income and academically struggling students. Of the $50.3 million in ‘at-risk’ funds that is supposed to follow DCPS students to their schools, only 59 percent was allocated to supplemental programming in FY 2019.

The proposed budget does include much-needed funds for three critical special education reforms that align services with best practices, which have been on hold since 2014 due to lack of funding, and $9.6 million in new dollars for Out-of-School Time, reversing years of underfunding for afterschool and summer programming.

While those increases are significant, the budget offers no new investments in Restorative Justice models in schools to help steer DC schools away from a costly overreliance on punitive school discipline, or additional dollars to strengthen Community School models that serve the ‘whole-child’.

### SUMMARY

- Per-student funding up by 3.9 percent ($10,658), but still far from Adequacy Standard ($11,600)
- Only 60 percent of DCPS school level ‘at-risk’ funds in FY 2019 allocated for supplemental supports for low-income students, 40 percent is unaccounted for
- Critical investment of $9.6 million new dollars for Out-of-School-Time programs
- Fully funded 2014 special education reforms: faster evaluations, better transition-planning, and early intervention services for more toddlers
- Mental health supports in schools up by $3 million
- School nurses supported with $4.4 million increase
- No new funding for Restorative Justice to help schools reduce costly, punitive school discipline
- No new funding for Community Schools, who build partnerships to address family & neighborhood needs
- The non-residential facilities allotment for public charters increased by 2 percent to $3,263 per student
- The FY 2019-2024 capital budget outlines $335 million for capital projects in DCPS in FY 2019

### FIGURE 1.

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1. This year’s increase brings us closer than we have ever been, but we are still $942 per student, or 9 percent, short (Figure 1).
School Funding Increase Brings Us Closer to Adequate Levels, But Budget Pressures Remain

The general fund for DCPS now totals $856.8 million, while the total operating budget for public charters now amounts to $891.9 million.\(^2\)

In DC, school funding starts with a base amount per student, which is then adjusted upwards depending on the student’s grade and characteristics. Schools receive additional resources for students who are English language learners, special education students, or ‘at-risk’ of academic failure (Table 2, pg. 16).\(^3\) By law, the school funding formula funds both DCPS and public charter school students equally.

Increasing the base amount gives schools the flexibility to meet increasing needs. The proposed FY 2019 budget will up the base by 3.9 percent, from $10,257 to $10,658 per-student. But the impact of this increase is muted by the fact that school budgets have been too tight for too long.

For nearly a decade, increases to school funding did not even keep pace with the rising cost of living. DC’s slowly recovering education budget mirrored school budget cuts in states across the nation.\(^4\) Consequently, it was not until 2018 that schools and teachers had resources to invest in the success of their students on par with what they did nine years earlier (Figure 2). Now, school funding finally exceeds the amount allocated in FY 2009, adjusted for inflation (Table 1, pg. 15). School budget increases over this period have been arbitrary. Last year, the Council Budget Office studied the issue, noting that “after [fiscal year 2008] there appears to be little relationship between the average rate of inflation and the increase to the UPSFF...[and] between the increase to the UPSFF and enrollment.”\(^5\)

School funding should be tied to what it actually costs to equip every student with a high quality education. Even with a 3.9 percent increase, the per-pupil funding level is well below this level, based on the 2013 DC Education Adequacy Study commissioned by the DC government.\(^6\) That data-driven analysis, once adjusted for inflation, would require a base rate of $11,600 per-student in FY 2019—that is almost $1,000 more per-student than the $10,658 allocated. With the recommended base of $11,600, the local education budget would have another $140.4 million to invest in next year’s students.

Since the publication of the 2013 DC Education Adequacy Study five years ago, the actual amount we have budgeted to support DC students has consistently been lower than recommended. In some years the gap has grown rather than shrunk. This year’s increase brings us closer, but we are still $942, or 9 percent, short (see Figure 1, pg. 1).

The 3.9 percent increase for FY 2019 may be the largest in recent years, but it is part of a trend of modest increases since FY 2010 that have cumulatively left DC classrooms shorthanded.
Proposed Budget Includes Long-Awaited Raises for DC Teachers

Teachers deserve salaries that keep pace with the rising cost of living in DC. More than 4,000 teachers in the Washington Teachers Union (WTU) went without a contract, or a salary increase, for 5 years. This past September teachers received a long-overdue raise: 4 percent for 2017, 3 percent for 2018, and 2 percent for 2019, or 3 percent on average.

The DC Council paid for these over-due compensation increases this fall by retroactively increasing the base level of funding per-student for the last two budgets (both FY 2017 and FY 2018). Base funding increased from $9,682 to $9,885 per student in FY 2017 and from $9,972 to $10,257 per student in FY 2018.

The UPSFF funds students the same amount, whether they attend a DCPS or public charter school, so per-student funding for charter students also increased by an equivalent amount after the WTU contract win. Charter schools do not have any responsibility to invest the additional money in teacher compensation.

The WTU contract also pre-determined a floor of $10,447 in per-student funding for the FY 2019 budget. This is because the District committed to raising teacher compensation by 2 percent in FY 2019. So of the 3.9 percent increase this year, 1.9 percentage points were already allocated to help educators manage the rising cost of living.

But there is a critical difference between investing enough resources to pay teachers what they deserve and investing enough resources to hire enough teachers for every classroom.

As a city, we need to provide enough funds for schools to compensate educators, staff classrooms, and improve student outcomes.

Enrollment Challenges

Increasing public school enrollment is good for District families, our economy, and our future. Student enrollment in DCPS and public charter schools steadily increased from 2009 to 2018. Costs rise along with enrollment, as more students need more teachers and more textbooks.

Projected enrollment for FY 2019 is mostly flat compared to budgeted enrollment for FY 2018, (Figure 3). A total of 95,158 students are expected to enroll in public schools in the District next year. That’s a net increase of 544 students, all of whom are expected to join public charter schools. The school budget is built on projected enrollment for the upcoming school year. School enrollment is then annually collected and verified, as of Oct. 5 by the Office of the State Superintendent for Education (OSSE). Every year, students may choose to use their guaranteed slot at their by-right neighborhood school, or enter the lottery to join an out-of-boundary DCPS school, or a public charter school.

FIGURE 3.

Projected 2019 Enrollment About the Same as Budgeted for 2018

Source: Fiscal Year 2018-19 Budget & Financial Plans

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For the 2018 school year, the audited number of students enrolled in a DCPS school and supported by UPSFF funds actually declined, after five years of growth (Figure 4). Those declines from 2017 to 2018 were starker for DCPS schools east of the Anacostia river than west of the river. For every student gained at a DCPS school west of the river, DCPS schools east of the river lost ten students (Figure 5). The District needs to invest more in DCPS schools east of the river to ensure students have guaranteed access to a quality school in their neighborhood, particularly since more than half of the city’s students call Wards 7 and 8 home.¹¹

Enrollment declines can pose huge problems for individual school budgets, and can have destabilizing effects for communities, funding, and programs. Because we largely allocate educational funding on a per-student basis, schools with declining enrollment often must contend with shrinking budgets, while simultaneously trying to improve services and attract families. Schools are given stabilization funds to help, but that is not always enough, particularly for student bodies with the greatest needs.¹²

Projected budgeted enrollment largely shapes how much individual schools receive. But it can be immensely frustrating for parents, teachers and advocates trying to understand exactly how enrollment changes and citywide budget decisions have translated into budget changes at their school.

Further, for DCPS schools, simply comparing topline individual school enrollment changes and dollar changes may not reflect changes in the characteristics of the student body that are driving the dollar changes, like fewer special education students for example. This challenge can confound efforts of community members trying to understand the equity of school level budget changes within DCPS.
Limited School Funding Can Lead to Misuse of ‘At-Risk’ Money

Both DCPS schools and public charter schools receive an additional $2,334 per student for low-income students and other students at-risk of falling behind academically. ‘At-risk’ funds are designed to promote equity: to ensure that low-income students get the same kinds of enriching opportunities and services as their higher-income peers, and to ensure that students who are struggling academically get the targeted supports they need to succeed in the classroom. They are supposed to help schools provide supplemental resources and expand important services for the students who need them most. By law, 90 percent ($2,100) of ‘at-risk’ funds must follow the student to their school in DCPS schools.

There are distressing differences between the educational outcomes of economically disadvantaged students and their wealthier peers in the District. Less than a quarter of low-income DC high school students test college and career ready in English (Figure 6).

Schools are also failing to prepare students of color for college and careers to the same degree as white students. In high school English, 87 percent of white students are considered college and career ready compared to only 21 percent of Black students (Figure 7).

Racial disparities in student outcomes are actually widening in the District. Although the PARCC scores of all DC students and subgroups improved overall, the scores of white students improved five percentage points more than Black students.13

Economic and racial injustice are distinct and yet intertwined, with particularly devastating consequences for low-income students of color. Addressing the injustice of these inequalities requires targeted resources, like ‘at-risk’ dollars.
But tight school budgets overall have led to the misuse of ‘at-risk’ funds. Schools struggling to maintain current staffing or otherwise meet necessary requirements are often forced to reallocate dollars for targeted services for the students who need them most, and de-prioritize enriching arts and afterschool programs—never mind make needed improvements. In this way, inadequate school funding limits the ability of schools to change the large and troubling differences in academic outcomes between the District’s low-income students and higher-income students.

For example, in the proposed FY 2018 budget, DCPS was planning to use nearly half of the dedicated ‘at-risk’ funding to pay for core classroom staff instead of supporting additional, targeted resources like evening credit recovery, according to an analysis by school budget expert, Mary Levy.14

Levy’s findings were corroborated by a 2017 study by the DC Auditor. In a study of eight DCPS elementary schools, the Auditor revealed that at least four of the schools used ‘at-risk’ funds to comply with basic staffing standards.16 Although the Public Charter Schools Board publishes a report on how schools spend their ‘at-risk’ dollars, families often do not have information on how these dollars are budgeted for the next year in real time.17

In the FY 2019 budget, there are $103.9 million total ‘at-risk’ dollars for both DCPS and public charters to offer specific supports for low-income youth and young people who are struggling academically. It is likely that the problematic funding of core positions with this ‘at-risk’ money will continue.

In FY 2019, of the $50.3 million that are supposed to follow DCPS students to their schools, only 59 percent was allocated in ‘at-risk eligible ways’ ($29.8 million), according to Mary Levy’s latest analysis (Figure 8). This is actually a conservative estimate. It assumes that ‘at-risk’ funds are being used to support every staff person beyond those positions guaranteed to every school by the Comprehensive Staffing Model, when most schools should also have other pots to draw from, like Title I.18

Every dollar of the $50.3 million should be easily identifiable because all ‘at-risk’ dollars are supposed to be supplemental. Yet the allocation of the other 41 percent of ‘at-risk’ funds could not be identified in the individual school budgets.

“Using funds ear-marked for a sub-group of students to benefit an entire group of students defeats the purpose of supplemental funding. If schools need to use those supplemental funds to be a compliant, it’s a sign that the model may not be fully funded.”15

-Kathy Patterson, Office of the District of Columbia Auditor

FIGURE 8.

Only 59 Percent of DCPS ‘At-Risk’ Funds Allocated to Supplemental Programming in FY 2019

- Unaccounted For, Likely ‘Supplanting’ Core School Function
- Budgeted to Support Supplemental Staff and Targeted Programs

Note: By law, 90 percent of ‘at-risk’ funds must follow students to their DCPS schools. Of that $50.3 million in at-risk funds, only $29.8 million was allocated to support positions in addition to those guaranteed in the Comprehensive School Staffing Model. All school level ‘at-risk’ funds should be budgeted and spent in ways that are identifiable supplemental. It is likely that a large share of these unaccounted for ‘at-risk’ funds are once again paying for core staff, instead of supplemental services.

Source: Analysis of DCPS’ initial budget allocations for FY 2019 by Mary Levy, April 2018.
($20.5 million).\(^{19}\) It is likely that a large share of these unaccounted for ‘at-risk’ funds are once again paying for core staff, instead of supplemental services.

Schools must be adequately funded so that basic needs are met, without having to tap ‘at-risk’ funds. The parents of wealthier DC students often compensate for inadequate school funding by raising significant sums of money for their child’s school, because they have the resources to do so.\(^{20}\) ‘At-risk’ funds are supposed to help reduce these existing inequities between the school budgets of low-income and higher-income children, but the misuse of ‘at-risk’ funds exacerbates those inequities.

Even if every dollar of ‘at-risk’ money in the FY 2019 budget was allocated on targeted services as intended, these funds would remain far short of the levels recommended in the 2013 Adequacy Study. The recommended ‘at-risk’ weight is actually 0.37, higher than the current 0.219. If the ‘at-risk’ weight were increased as recommended, and all else remained the same, schools would have $71 million more ‘at-risk’ dollars to invest in targeted services for students overall (or $1,609 more per-student).\(^{21}\)

A projected 44,496 students in DC students qualify for ‘at-risk’ funding in the 2018-2019 school year because they are a foster care student, experiencing homelessness, overage for their grade, or participate in SNAP or TANF.\(^{22}\) This means that about half of DC students, in both sectors, are struggling in the classroom or growing up in families working hard to make ends meet.

Not every student requires the same resources and supports to succeed. Far too many DC students face enormous challenges—unhealthy environments, housing instability, food insecurity, care-giving responsibilities, and the stress of living paycheck to paycheck. Their PARCC scores may or may not reflect those realities. (For more on housing issues see DCFPI’s Affordable Housing Toolkit and DCFPI’s Homeless Services Toolkit).

The inclusion of low-income measures in the definition of ‘at-risk’ underscores the need to think beyond PARCC scores and strictly academic supports. For low-income students increased funding for Community Schools with wrap-around services, Restorative Justice Models in schools, and better mental health services may be particularly important.\(^{23}\)

**More Transparency and Community Involvement Needed on ‘At-Risk’ Funds and School Budgets**

DCPS released a citywide report this past September detailing the changes that the FY 2018 funding formula increase would support.\(^{24}\) But despite this report, we remain concerned that a substantial share of ‘at-risk’ funding is budgeted for core staff positions.

Information on the school level allocation of ‘at-risk’ funds is not made readily accessible in real time, and actual spending of ‘at-risk’ funds is not tracked. DCPS should add a code to the SOAR financial system to this end, as recommended by education budget expert, Mary Levy.\(^{25}\)

School leaders and Local School Advisory Teams (LSATs) in DCPS are expected to play a role in shaping their school’s budget each year, but the lack of transparency over both budgeted allocations and actual expenditures of ‘at-risk’ funds at the school level does not allow them to engage in meaningful discussions over how to use these funds to improve student outcomes.

Sadly, many conversations on school budgets are not forward-thinking ones that draw connections between the adequacy of the budget and planned school improvements, but rather backwards-looking attempts to understand what is driving staffing cuts.

DCPS should work with Council, the CFO, parents, teachers, principals and advocates to present the connection between citywide and
school level funding in accessible and understandable ways, and promote meaningful community inclusion in the process. Budgeted expenditures should be clearly connected to revenue sources in Individual School Budget Worksheets (see Appendix A, pg. 18). School level leaders, alongside teachers and families, should be able to leverage ‘at-risk’ funds to serve their students’ specific needs in evidence-based ways.

Improvements to the transparency and inclusivity of the school budget process should also not be restricted to DCPS. Charter school parents and teachers are often at a loss to understand cuts in their schools and lack the information to advocate for change. The Public Charter School Board should also collaborate with policymakers and the public to give families better information.

**Critical Investments Made in Enriching Out-of-School Time Programs, And Yet More is Needed**

Every parent wants the best for their child, but not all parents have the means to pay for enriching before-school, after-school or summer activities.

Out-of-School-Time (OST) programs that occur outside of a traditional school day allow experiential learners to thrive, exposing students to arts, athletics, technology and applied science, with demonstrated payoffs in classroom performance. OST opportunities improve academic, social, and health outcomes, and give parents peace of mind knowing their children are in a safe environment while they work. After-school programs reduce how often parents miss work, and summer programs limit summer learning loss.

The proposed FY 2019 budget includes $9.6 million in new dollars, an $8.1 million increase for the Office of OST Grants and Youth Outcomes, and a $1.5 million increase for the Department of Parks and Recreation. The proposed budget allocates a total of $19.2 million for Out-of-School-Time learning in these two agencies.

This investment reverses years of underfunding afterschool and summer school programming that have left more children waiting to get into afterschool programs than are currently enrolled. There are about 5,900 students without afterschool options, and 25,600 students without summer opportunities, who qualify for ‘at-risk’ funding (Figure 9).

DC Council should protect and build on this investment by increasing new dollars for OST programming by another $5.8 million. Another $5.8 million will move the District closer to providing the students who need it most with the same kind of enriching, Out-of-School-Time opportunities as their higher-income peers. Future investments will be guided by the Commission on OST Grants and Youth Outcomes that is working to advance better access to quality OST programming across the city.
Funding the 2014 Special Education Reforms

The proposed budget funds three critical special education reforms that align services with best practices, which have been on hold since 2014 due to lack of funding: early intervention for more children, faster evaluations, and better transition planning. DC Council should preserve this essential investment.

The budget funds faster evaluation timelines and earlier transition planning by increasing a weight in the school funding formula. Although there are no new funds explicitly identified in OSSE’s budget for the early intervention expansion, the “subject to appropriations” language has been lifted and the money needed to fund the reform has been incorporated into OSSE’s financial plan. Updated eligibility data and offsets from Medicaid payments resulted in a much lower fiscal impact than first estimated. OSSE now estimates that 180 children will be eligible monthly, at a cost of $865 per child.

This long-awaited investment is especially critical, given that students with disabilities and developmental delays are among the least well served by District schools. Many special education students in DC do not get the supports they need to succeed, and by high school, fewer than one in ten are college and career ready. One year after graduating or leaving school, two-thirds of youth with disabilities in DC are not in college or working (Figure 10).

With the full funding of the Enhanced Special Education Services Amendment Act of 2014, students with disabilities will get services faster and will be able to plan for their future earlier.

- **Early Intervention for More Children**: Birth to age three is a crucial time for brain and body growth. Yet too many babies and toddlers fall behind because they have unaddressed developmental delays in areas like language or motor skills, especially low-income children. Almost half of children who get early intervention services completely catch up to their peers behaviorally by kindergarten (Figure 11, pg. 10). Starting in July, more toddlers will get back on track.

- **Faster Evaluation**: Currently, schools have 120 days to complete evaluations for special education. That means a child can struggle without services for half the school year. The

![Troubling Outcomes for Students with Disabilities in DC Schools](image)

**Source:** Office of the State Superintendent Responses to 2018 Performance Hearing, OSSE Reported Statewide 2016-17 PARCC Scores.
proposed budget allocates the funds to halve that and bring it in line with jurisdictions across the country. Faster diagnosis prevents lost learning time for students, and months of stress for their families.

**Better Transition Planning:** Individual transition plans help youth with disabilities figure out how to take steps towards their personal aspirations for college, career, and independent living. Youth do better when they have robust support from their schools and families, and when they start transition planning earlier, at age 14 instead of 16—before choosing their high school.

**Proposed Additions to School Based Mental Health Programs**

In the FY 2019 budget, $3 million is included to improve and expand services for the Department of Behavioral Health (DBH) School Mental Health Program (SMHP), per the recommendations from the Task Force on School Mental Health. DBH clinicians will continue providing a range of services at their already-assigned schools. Through increased partnership with community-based organizations, SMHP will be further expanded to provide services to the District’s highest need schools.

The $3 million in funding is comprised of $1.9 million in grants to be awarded to community-based behavioral health providers, which will support clinicians and clinical supervisors for billable clinical services and non-billable interventions and supports. These include parent and teacher consultation, school team meetings, care coordination, and crisis management. About $524,000 will be devoted to developing a Community of Practice, helping providers and schools begin implementing the multi-tiered model.

Lastly, $125,000 will support an evaluation of the first year of implementation. The DBH SMHP offers mental health support to youth, families, teachers and staff in DC’s public and public charter schools to reduce behavioral health-related barriers to learning. To date, the program has provided prevention, early intervention and treatment services to 57 schools in DC. (For more on the District’s health budget for FY 2019, see DCFPI’s Health Toolkit.)

**More Support for School Health**

The budget includes $4.4 million to support new components of the School Health Services Program (SHSP). (For more on the District’s health budget for FY 2019, see DCFPI’s Health Toolkit.)

**Lack of Investments in Restorative Justice**

When schools rely on exclusionary discipline, students miss lessons, fall behind upon return, and are more likely to drop out. When more students are suspended, studies show all students’ academic achievement suffers. In 2017, DC schools issued 12,897 out of school suspensions to 7,181 students, including 4,335 for “disrespect, insubordination or disruption” (Figure 12, pg. 11).
Unfortunately, all of the aforementioned data must be considered a very conservative estimate as the Washington Post revealed a systemic DCPS practice of using undocumented suspensions or “do-not-admit lists” to prohibit students from attending school, without recording the absence as a suspension.\(^{34}\)

DC also disproportionately suspends the students most in need of support. Students of color, students with disabilities and students in the foster care system are disproportionately suspended and expelled every day. There is no evidence that students of color misbehave any more than white students, yet in DC, Black students are 7.7 times more likely to be suspended and sent out of the classroom than their white peers (Figure 13).\(^{35}\) This sets Black children up for failure each time they are sent home, as suspended and expelled students are more likely to perform poorly academically, fail classes, and drop out of school.\(^{36}\)

Students with disabilities are over twice as likely to be suspended as students without disabilities.\(^{37}\) Troublingly, children with disabilities are often suspended for behavior directly caused by or related to their disability. For example, a child who is Deaf and unable to respond appropriately to a teacher’s oral instructions can be suspended for defiance. Current law allows children with disabilities to be suspended for up to two weeks of school, before students have rights to additional interventions and supports.

Giving schools the funds to fully staff promising solutions like Restorative Justice allows them to better address the root causes of disruptive behavior. Students acquire the skills to manage their emotions and actions, learn to take responsibility for their mistakes, develop a greater sense of empathy, strengthen relationships, and repair harm. Teachers are better supported in managing the classroom without interrupting the learning of individual students.

The former school Chancellor, Chancellor Wilson stated his intention during last year’s budget hearing for DCPS to expand Restorative Justice models to 74 schools. Yet he had no additional funding from DC to do so.
The proposed FY 2019 budget once again offers no new funds for Restorative Justice Models or other positive behavioral interventions in schools.

DC Council should set aside $16 million in the FY 2019 budget to implement the “Student Fair Access to School Act,” so all students can stay engaged and learning. The legislation would steer all DC schools away from an ineffective, counterproductive, and costly overreliance on punitive discipline.

No New Dollars for Community Schools

Schools are not just centers of academic instruction. They are among our most important and trusted community institutions. Schools can build on that strength to become community hubs by embracing the “Community School Model.” Community Schools partner with community-based organizations to connect children and their families with services that strengthen the whole neighborhood. Those services can include health care, afterschool programs, adult education, and early childhood programming. These “integrated student supports” in turn can lead to engaged families, stronger communities, and better academic outcomes.

The Office of the State Superintendent for Education (OSSE) currently administers funding to eight grantees at thirteen schools, through the Community Schools Incentive Initiative. The total funding available for FY 2018 was $1,415,027. Each applicant could receive up to $177,146 and remain eligible for continued funding for two years.

Consolidating school and essential services into one building helps children from low-income families by removing barriers to accessing services and resources, reducing absenteeism, improving academic performance, and building trust among students, parents, and faculty.

The District should make it possible for more interested schools to become vibrant Community Schools, with strong integrated services and partnerships. DC Council should add significantly more funding to improve current models, expand the pilot, and evaluate the impact of different approaches in the District.

The Challenges of Modernizing and Maintaining School Facilities

Building and maintaining safe facilities for learning is a big driver of costs in education budgets. For both DCPS and public charters, the Uniform Per Student Funding Formula covers utilities, custodial, routine maintenance and minor repairs. But the long-term costs of major modernizations, new construction, and acquisition of land or buildings is managed very differently, with each sector facing its own challenges.

Public charter school operators are responsible for leasing or purchasing facilities, as well as improving them. DC government gives charters a facilities allotment per student on top of their instructional budgets to help manage these costs (Figure 14, pg. 13). The non-residential facilities allotment for public charter schools will increase 2 percent to $3,263 per student in the FY 2019 budget. The residential facilities allotment will grow by 3 percent, up to $8,854 per student. Overall, the District will pay $145 million for non-residential charter school facilities, and $4.4 million on residential facilities. Charter schools are not required to use their facilities allotment on facilities costs.

DC Public School buildings are owned and controlled by the District. The school capital budget is largely financed with borrowing through general obligation municipal bonds. The proposed FY 2019-24 budget outlines $1.35 billion for 31 DCPS school modernization projects and 16 District-wide projects over the next six fiscal years, including $335 million in FY 2019.
It Is Time to Reassess the Cost of An Adequate Education

A rigorous reassessment of our educational policies will fall short without a corresponding reassessment of the adequacy of our educational investments. Addressing underlying issues is not just a question of setting smart policies, it is also a question of resources. A singular focus on the percentage increase to the Uniform Per Student Funding Formula does not fully capture whether staffing models include everything they should, or if targeted resources are well-spent on effective programs for the students who need them most.

Five years have passed, and yet we still have not reached the level of resources recommended in the 2013 Adequacy Study, once adjusted for inflation – let alone the level needed to keep up with all of our system’s changing needs. Budget increases for DC public schools and public charter schools in recent years have been arbitrary, and not connected to what’s really needed to provide quality education. We need a better blueprint for the resources required to staff every school and the resources needed to support low-income students in particular.

DC Council should allocate enough money in the FY 2019 budget to revise the 2013 Adequacy Study, with input from both the public and the biennial Technical Working Group.

Every two years, OSSE is legally required to convene a Technical Working Group (TWG) that includes representatives from DCPS, public charters and the public to offer recommendations on revisions to the school funding formula. Last year, the TWG recommended an increase in base per-student funding of 3.5 percent, a threshold the approved FY 2018 budget did not meet. Importantly, the 3.5 percent was a one-year recommendation. It is not the standard we need to meet each year, rather it was a means to move us closer to adequate funding levels.

Revising the Adequacy Study is particularly important at this time. DCPS is considering abandoning the Comprehensive Staffing Model in favor of a stricter Student Based Budgeting Model. This model can particularly hurt small schools and schools with declining enrollment for next year’s budget, FY 2020.
### EDUCATION RECOMMENDATIONS FOR THE DC COUNCIL ON THE FY 2019 BUDGET

#### Proposed New Educational Investments to Preserve
- Enhancements to child care Subsidies: $9.5 million new dollars
- Funding the special education reforms: $4.2 million in new funding
- Moderately increasing the UPSFF: 3.9 percent increase
- Investing in Out-of-School Time: $9.6 million new dollars
- Improving mental health supports in schools: $3 million in new funding

#### New Educational Investments to Prioritize in Fiscal Year 2019
- Commission a revision of the 2013 Adequacy Study
- Pass and fund the “Birth to Three in DC” legislation
- Enact and implement the “Student Fair Access to School Act”: $16 million in FY 2019
- Build on the proposed Out-of-School Time investment: $5.8 million more
- Increase funding for Community School Models
- Ensure at least $2 million local dollars are actually spent on DOH-based home visiting programs
- Add to school based mental health supports to properly staff schools with clinicians from community based organizations: $319,000

#### Education Budget Improvements for the Long-Term
- Clearly connect ‘at-risk’ revenues and budgeted expenses in the Initial School Budget Worksheets
- Instruct DCPS to add an ‘at-risk’ cost code to the SOAR financial system
- Legislate a date by which all Local School Advisory Teams must receive their school’s initial budget
- Require charter schools to collect and publicize school-level “at-risk” allocations and expenditures funded by ‘at-risk’ dollars
- Oversee a robust public process with meaningful opportunities for families and community members to advise on any changes to the DCPS Comprehensive Staffing Model
- Assemble a standing budget advisory committee comprised of a diverse group of school leaders, community advocates and parents
- Increase the “at-risk” weight up from 0.219 to the recommended 0.37
- Automatically increase the Uniform Per Student Funding Formula by a cost of living adjustment

*For more information on the early childhood education recommendations see DCFPI’s Early Childhood Development Toolkit.*

**TABLE 1.**
Annual Percentage Change in the Uniform Per Student Funding Formula (UPSFF)

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>UPSFF</th>
<th>Percent Change</th>
<th>UPSFF Adjusted for Inflation in FY 2019</th>
<th>Percent Change Each Year</th>
<th>Percent Change Since ‘09*</th>
</tr>
</thead>
<tbody>
<tr>
<td>'07</td>
<td>$8,002</td>
<td>4.0%</td>
<td>$9,945</td>
<td></td>
<td></td>
</tr>
<tr>
<td>'08</td>
<td>$8,322</td>
<td>4.0%</td>
<td>$9,903</td>
<td>-0.4%</td>
<td></td>
</tr>
<tr>
<td>'09</td>
<td>$8,770</td>
<td>5.4%</td>
<td>$10,470</td>
<td>5.7%</td>
<td></td>
</tr>
<tr>
<td>'10</td>
<td>$8,770</td>
<td>0.0%</td>
<td>$10,296</td>
<td>-1.7%</td>
<td>-1.7%</td>
</tr>
<tr>
<td>'11</td>
<td>$8,945</td>
<td>2.0%</td>
<td>$10,230</td>
<td>-0.6%</td>
<td>-2.3%</td>
</tr>
<tr>
<td>'12</td>
<td>$8,945</td>
<td>0.0%</td>
<td>$9,989</td>
<td>-2.4%</td>
<td>-4.6%</td>
</tr>
<tr>
<td>'13</td>
<td>$9,124</td>
<td>2.0%</td>
<td>$10,026</td>
<td>0.4%</td>
<td>-4.2%</td>
</tr>
<tr>
<td>'14</td>
<td>$9,306</td>
<td>2.0%</td>
<td>$10,063</td>
<td>0.4%</td>
<td>-3.9%</td>
</tr>
<tr>
<td>'15</td>
<td>$9,492</td>
<td>2.0%</td>
<td>$10,232</td>
<td>1.7%</td>
<td>-2.3%</td>
</tr>
<tr>
<td>'16</td>
<td>$9,492</td>
<td>0.0%</td>
<td>$10,138</td>
<td>-0.9%</td>
<td>-3.2%</td>
</tr>
<tr>
<td>'17</td>
<td>$9,682</td>
<td>2.0%</td>
<td>$10,133</td>
<td>0.0%</td>
<td>-3.2%</td>
</tr>
<tr>
<td>'18</td>
<td>$10,257*</td>
<td>5.9%*</td>
<td>$10,491</td>
<td>3.5%</td>
<td>0.2%</td>
</tr>
<tr>
<td>'19</td>
<td>$10,658**</td>
<td>3.9%**</td>
<td>$10,658</td>
<td>1.6%</td>
<td>1.8%</td>
</tr>
</tbody>
</table>

Note: Shown in Figure 1. Figures are adjusted for inflation or not as indicated in the headings.

*Includes retroactive increase to cover the Washington Teacher’s Union’s New Contract. Original approved FY 2018 increase was 3%  
**Includes funds to cover Washington Teacher’s Union’s New Contract  
### TABLE 2.

**FY 2019 Weights in the Uniform Per Student Funding Formula (UPSFF)**

<table>
<thead>
<tr>
<th>Category</th>
<th>Weight</th>
<th>Enrollment DCPS</th>
<th>Enrollment PCS</th>
<th>Enrollment Total</th>
<th>Per-Student $ DCPS</th>
<th>Total Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>PK3</td>
<td>1.34</td>
<td>2,378</td>
<td>3,428</td>
<td>5,806</td>
<td>$14,282</td>
<td>$82,919,666</td>
</tr>
<tr>
<td>PK4</td>
<td>1.3</td>
<td>3,603</td>
<td>3,491</td>
<td>7,094</td>
<td>$13,855</td>
<td>$98,290,208</td>
</tr>
<tr>
<td>K</td>
<td>1.3</td>
<td>4,298</td>
<td>3,533</td>
<td>7,831</td>
<td>$13,855</td>
<td>$108,501,637</td>
</tr>
<tr>
<td>Grade 1</td>
<td>1</td>
<td>4,280</td>
<td>3,162</td>
<td>7,442</td>
<td>$10,658</td>
<td>$79,316,836</td>
</tr>
<tr>
<td>Grade 2</td>
<td>1</td>
<td>4,155</td>
<td>3,028</td>
<td>7,183</td>
<td>$10,658</td>
<td>$76,556,414</td>
</tr>
<tr>
<td>Grade 3</td>
<td>1</td>
<td>3,963</td>
<td>2,661</td>
<td>6,624</td>
<td>$10,658</td>
<td>$70,598,592</td>
</tr>
<tr>
<td>Grade 4</td>
<td>1</td>
<td>3,950</td>
<td>2,496</td>
<td>6,446</td>
<td>$10,658</td>
<td>$68,701,468</td>
</tr>
<tr>
<td>Grade 5</td>
<td>1</td>
<td>3,595</td>
<td>2,530</td>
<td>6,125</td>
<td>$10,658</td>
<td>$65,280,250</td>
</tr>
<tr>
<td>Grade 6</td>
<td>1.08</td>
<td>2,451</td>
<td>2,898</td>
<td>5,349</td>
<td>$11,511</td>
<td>$61,570,413</td>
</tr>
<tr>
<td>Grade 7</td>
<td>1.08</td>
<td>2,371</td>
<td>2,676</td>
<td>5,047</td>
<td>$11,511</td>
<td>$58,094,200</td>
</tr>
<tr>
<td>Grade 8</td>
<td>1.08</td>
<td>2,207</td>
<td>2,489</td>
<td>4,696</td>
<td>$11,511</td>
<td>$54,053,965</td>
</tr>
<tr>
<td>Grade 9</td>
<td>1.22</td>
<td>3,462</td>
<td>2,516</td>
<td>5,978</td>
<td>$13,003</td>
<td>$77,730,499</td>
</tr>
<tr>
<td>Grade 10</td>
<td>1.22</td>
<td>2,638</td>
<td>1,894</td>
<td>4,532</td>
<td>$13,003</td>
<td>$58,928,508</td>
</tr>
<tr>
<td>Grade 11</td>
<td>1.22</td>
<td>2,434</td>
<td>1,596</td>
<td>4,030</td>
<td>$13,003</td>
<td>$52,401,123</td>
</tr>
<tr>
<td>Grade 12</td>
<td>1.22</td>
<td>2,320</td>
<td>1,342</td>
<td>3,662</td>
<td>$13,003</td>
<td>$47,616,107</td>
</tr>
<tr>
<td>Alternative</td>
<td>1.44</td>
<td>1,553</td>
<td>880</td>
<td>2,433</td>
<td>$15,348</td>
<td>$37,340,516</td>
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<tr>
<td>Special Education</td>
<td>1.17</td>
<td>143</td>
<td>250</td>
<td>393</td>
<td>$12,470</td>
<td>$4,900,655</td>
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<tr>
<td>Adult</td>
<td>0.89</td>
<td>442</td>
<td>4,045</td>
<td>4,487</td>
<td>$9,486</td>
<td>$42,561,977</td>
</tr>
<tr>
<td>At-Risk</td>
<td>0.219</td>
<td>25,023</td>
<td>19,473</td>
<td>44,496</td>
<td>$2,334</td>
<td>$103,858,203</td>
</tr>
<tr>
<td>English Language Learners</td>
<td>0.49</td>
<td>6,280</td>
<td>3,474</td>
<td>9,754</td>
<td>$5,222</td>
<td>$50,939,485</td>
</tr>
<tr>
<td>General Education</td>
<td></td>
<td>50,243</td>
<td>44,915</td>
<td>95,158</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: multiply the “weight” by the base amount, $10,658 per-student to arrive at the per-student dollar amount for each category.

Source: Fiscal Year 2019 Budget and Financial Plans: [DCPS Budget Books Chapter](#); [PCS Budget Books Chapter](#)
## Table 2. Cont.

<table>
<thead>
<tr>
<th>Category</th>
<th>Weight</th>
<th>Enrollment DCPS</th>
<th>Enrollment PCS</th>
<th>Enrollment Total</th>
<th>Per-Student $ DCPS</th>
<th>Total Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Education 1</td>
<td>0.97</td>
<td>2,799</td>
<td>2,098</td>
<td>4,897</td>
<td>$10,338</td>
<td>$50,626,459</td>
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<tr>
<td>Special Education 2</td>
<td>1.2</td>
<td>2,000</td>
<td>1,882</td>
<td>3,882</td>
<td>$12,790</td>
<td>$49,649,227</td>
</tr>
<tr>
<td>Special Education 3</td>
<td>1.97</td>
<td>648</td>
<td>810</td>
<td>1,458</td>
<td>$20,996</td>
<td>$30,612,547</td>
</tr>
<tr>
<td>Special Education 4</td>
<td>3.49</td>
<td>1,633</td>
<td>1,327</td>
<td>2,960</td>
<td>$37,196</td>
<td>$110,101,403</td>
</tr>
<tr>
<td>Special Education Blackman Jones</td>
<td>0.099</td>
<td>7,080</td>
<td>6,117</td>
<td>13,197</td>
<td>$1,055</td>
<td>$13,924,709</td>
</tr>
<tr>
<td>Special Education Compliance Attorney Fees</td>
<td>0.089</td>
<td>7,080</td>
<td>6,117</td>
<td>13,197</td>
<td>$949</td>
<td>$12,518,173</td>
</tr>
<tr>
<td>Special Education 1 Extended School Yr.</td>
<td>0.063</td>
<td>226</td>
<td>307</td>
<td>533</td>
<td>$671</td>
<td>$357,885</td>
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<tr>
<td>Special Education 2 Extended School Yr.</td>
<td>0.227</td>
<td>262</td>
<td>270</td>
<td>532</td>
<td>$2,419</td>
<td>$1,287,103</td>
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<td>Special Education 3 Extended School Yr.</td>
<td>0.491</td>
<td>107</td>
<td>138</td>
<td>245</td>
<td>$5,233</td>
<td>$1,282,104</td>
</tr>
<tr>
<td>Special Education 4 Extended School Yr.</td>
<td>0.491</td>
<td>612</td>
<td>587</td>
<td>1,199</td>
<td>$5,233</td>
<td>$6,274,461</td>
</tr>
<tr>
<td>Special Education 1 Residential</td>
<td>0.37</td>
<td>30</td>
<td>30</td>
<td>30</td>
<td>$3,943</td>
<td>$118,304</td>
</tr>
<tr>
<td>Special Education 2 Residential</td>
<td>1.34</td>
<td>65</td>
<td>65</td>
<td>128</td>
<td>$14,282</td>
<td>$928,312</td>
</tr>
<tr>
<td>Special Education 3 Residential</td>
<td>2.89</td>
<td>31</td>
<td>31</td>
<td>30</td>
<td>$30,802</td>
<td>$954,850</td>
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<tr>
<td>Special Education 4 Residential</td>
<td>2.89</td>
<td>45</td>
<td>45</td>
<td>90</td>
<td>$30,802</td>
<td>$1,386,073</td>
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<tr>
<td>LEP/NEP Residential</td>
<td>0.67</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>$7,141</td>
<td>$7,141</td>
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<tr>
<td>Residential</td>
<td>1.67</td>
<td>490</td>
<td>490</td>
<td>980</td>
<td>$17,799</td>
<td>$8,721,441</td>
</tr>
</tbody>
</table>

Note: multiply the “weight” by the base amount, $10,658 per-student to arrive at the per-student dollar amount for each category

Source: Fiscal Year 2019 Budget and Financial Plans: DCPS Budget Chapter; PCS Budget Chapter
## APPENDIX A
Example Initial School Budget Worksheet

### Anacostia HS
Fiscal Year 2019 (FY19) Initial Allocation

- $X XM total budget
- -XXXX from prior year
- XXX total enrollment
- -XXX change in enrollment
- XX% ‘at-risk’ %
- $XXX total ‘at-risk’ funds

### Bar Charts Show Each Amount

<table>
<thead>
<tr>
<th>Position</th>
<th># of Required Positions</th>
<th>Expenditure Type</th>
<th>Revenue Fund</th>
<th>Budget Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>School Leadership</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Principal</td>
<td>1</td>
<td>Required</td>
<td>Base Local Funding</td>
<td>$170,000</td>
</tr>
<tr>
<td>Assistant Principal</td>
<td>1</td>
<td>Required</td>
<td>Base Local Funding</td>
<td>$140,000</td>
</tr>
<tr>
<td>Assistant Principal</td>
<td>1.4</td>
<td>Discretionary</td>
<td>At Risk Funding</td>
<td>$193,398</td>
</tr>
<tr>
<td><strong>General Education</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total General Ed</td>
<td>25</td>
<td>Required</td>
<td>Base Local Funding</td>
<td>$2,400,000</td>
</tr>
<tr>
<td><strong>Special Education</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aide</td>
<td>12</td>
<td>Required</td>
<td>SPED Local Funding</td>
<td>$400,000</td>
</tr>
<tr>
<td>Special Education Teacher</td>
<td>21</td>
<td>Required</td>
<td>SPED Local Funding</td>
<td></td>
</tr>
<tr>
<td><strong>English Language Learner</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teacher ELL</td>
<td>.5</td>
<td>Required</td>
<td>ELL Local Funding</td>
<td>$5,000</td>
</tr>
<tr>
<td>Social Worker</td>
<td>4</td>
<td>Required</td>
<td>Base Local Funding</td>
<td>$450,000</td>
</tr>
<tr>
<td>Social Worker</td>
<td>1</td>
<td>Districtwide ‘at-risk’ (Petition-able)</td>
<td>At Risk Funding</td>
<td>$90,000</td>
</tr>
<tr>
<td>Behavioral Technician</td>
<td>3</td>
<td>Districtwide ‘at-risk’ (Petition-able)</td>
<td>At Risk Funding</td>
<td>$135,000</td>
</tr>
<tr>
<td><strong>Schoolwide Instructional Support</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Instructional Coach</td>
<td>1</td>
<td>Required</td>
<td>Federal Title 1</td>
<td>$97,000</td>
</tr>
</tbody>
</table>

### Funding Source

<table>
<thead>
<tr>
<th>Source</th>
<th>Total</th>
<th>Expenditure Type</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Base Funding</td>
<td>XM</td>
<td>Required</td>
<td>XM</td>
</tr>
<tr>
<td>At Risk Funding</td>
<td>XXXX</td>
<td>Districtwide ‘at-risk’ (Petition-able)</td>
<td>XXXX</td>
</tr>
<tr>
<td>Special Education Funding</td>
<td>XXXX</td>
<td>Discretionary</td>
<td>XXXX</td>
</tr>
<tr>
<td>English Language Learner</td>
<td>XXXX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Title 1</td>
<td>XXXX</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1 Deputy Mayor for Education. (2013) “Cost of Student Achievement: Report of the DC Education Adequacy Study
2 Fiscal Year 2019 Budget and Financial Plans: DCPS Budget Books Chapter; PCS Budget Books Chapter
3 Multiply the “weight” by the base amount ($10,658 per-student) to arrive at the per-student dollar amount for each category. Categories like ‘at-risk’ and ‘English Language Learner’ should be added on top of the students grade-based funding.
6 Deputy Mayor for Education. (2013) “Cost of Student Achievement: Report of the DC Education Adequacy Study”
7 The Uniform Per Student Funding Formula (UPSFF) funds students the same amount, whether they attend a DCPS or public charter school, so per-student funding for charter students increased equivalently. Charter schools do not have any responsibility to invest the additional money in teacher compensation. “Fiscal Year 2018 Budget Support Clarification Emergency Amendment Act of 2017.”
8 In FY 2018, one-time funding was retroactively added to the Fiscal Year 2017 UPSFF for both DCPS and public charters, each sector received an additional $27 million to cover spending pressures.
9 $10,447 is a 1.9 percent increase from the adjusted FY 2018 base of $10,257. “Fiscal Year 2018 Budget Support Clarification Emergency Amendment Act of 2017.”
10 Under D.C. Official Code §38-1804.02, OSSE is required to annually collect enrollment counts for students whose tuition or education in schools or programs is paid for with District funds, as of Oct. 5 of each school year. OSSE is then required to verify the accuracy of the local education agencies’ (LEA) and community-based organizations’ (CBO) enrollment counts, as well as to determine the amount of fees and tuition assessed and collected from non-resident students. Office of the State Superintendent for Education (2018) “2017-18 School Year Enrollment Audit Report Data”
11 In 2016, 62 percent of people under 18 lived east of the river, compared to 37 percent west of the river. DC Action for Kids. Kids Count Data.
12 The Fair Student Funding and School Based Budgeting Act of 2013 provided that no school could lose more than 5% of its budget between fiscal years. If a school’s allocation would mean it would lose more than 5% of its budget between one year to the next DCPS allocates additional stabilization funds. Stabilization does not necessarily apply when a major school configuration occurs (for example: a school goes from an education campus to elementary school). “Definitions”, C4DC School Budget Tool
13 These are scores in English Language Arts. 2016-17 PARCC Scores.
14 Analysis by Mary Levy, April 2017
17 “FY 2017 report on the use of at-risk funding in DC public charter schools,” DC Public Charter School Board, February 2018
18 “Title I, Part A (Title I) of the Elementary and Secondary Education Act, as amended (ESEA) provides financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.” US Department of Education.
19 DCPS FY19 Initial School Budget Allocations
21 With a weight of 0.37 as recommended in the 2013 Adequacy Study, qualifying students would have $3,943 in additional ‘at-risk’ funds, or $175.5 million total (based off of a projected ‘at-risk’ subgroup of 44,496. That is $71.6 million more than the current $103.9 million total in at-risk funds.
22 SNAP stands for Supplemental Nutrition Assistance Program, formerly known as food stamps. TANF stands for or Temporary Assistance for Needy Families.
24 DC Public Schools Report for the FY2018 Budget Support Act of 2017, August 2017

DC FISCAL POLICY INSTITUTE
“Mary Levy’s Testimony” (2018) C4DC
26 DCAYA, “#ExpandLearning DC”, June 2016.
28 The Special Education Compliance (referred to as Blackman Jones Compliance in some documents) weight was increased from .069 ($9.7 million) to .099 ($13.9 million). This change results in $4,219,608 investment of new dollars in DCPS and PCS local funding to implement these changes. See the Proposed Fiscal Year 2019 Budget Support Act of 2018, Title IV,Subtitle A, Section 4002(c), at line 679.
30 Office of the State Superintendent for Education, 2016-17 PARCC Scores
31 Out of 1,171 students with disabilities who graduated in 2016, only 386 were employed, participating in college, or enrolled in another postsecondary degree program one year after graduation. Office of the State Superintendent. (2018). Question 46, Fiscal Year 2018 Performance Oversight Hearing Responses. Retrieved from the Committee on Education 2018 Dropbox
32 “The Outcomes of Early Intervention for Infants and Toddlers with Disabilities and Their Families,” National Early Childhood Technical Assistance Center, July 2011
33 Office of the State Superintendent for Education “State of Discipline: 2016 – 2017 School Year”
34 Emma Brown and Alejandra Matos, “Some D.C. high schools are reporting only a fraction of suspensions”, Washington Post (July 17, 2017).
39 Office of the State Superintendent for Education, “Community Schools Incentive Initiative Grantees 2018”
40 Anna Maier, Julia Daniel, Jeannie Oakes, and Livia Lam, “Community Schools as an Effective School Improvement Strategy: A Review of the Evidence,” Learning Policy Institute, Dec 2017
41 Capital Budget for GA0 District of Columbia Public Schools
42 3 § 38-2911. Periodic revision of Formula. (a) (1) Except as provided in paragraph (2) of this subsection, the Mayor and Council, in consultation with representatives of DCPS and of the Public Charter Schools, shall review and revise this Formula within 2 years of its establishment, within 2 years after this initial review and revision, and once every 4 years subsequently. Revisions shall be based upon information and data including study of actual costs of education in the District of Columbia, consideration of performance incentives created by the Formula in practice, research in education and education finance, and public comment. (2) Beginning January 30, 2016, the Mayor shall submit to the Council a report every 2 years that reviews the Formula and includes recommendations for revisions to the Formula based upon a study of actual costs of education in the District of Columbia, research in education and education finance, and public comment. (b) The study of actual costs of education pursuant to subsection (a) of this section shall include but not be limited to the following: (1) The relation of funding levels to student outcomes; (2) Maintenance of effort in specified areas of focus to promote continuity of effective practices; (3) Improved techniques for determining specific levels of funding needed to provide adequate special education services; (4) Improved measures of change in the cost of education; and (5) A review of the costs associated with serving at-risk students and how at-risk students are identified. (c) The Office of the State Superintendent for Education shall be responsible for the development of the report required by subsection (a) of this section and shall convene a working group, which shall be comprised of, at a minimum, representatives from DCPS, public charter schools, and the public, to solicit input and recommendations regarding revisions to the Formula.