

**Testimony of Qubilah Huddleston, Education Policy Analyst
At the Hearing on the
Critical Risk Rate School Funding Designation Act of 2019
Committee of the Whole and Committee on Education
March 10, 2020**

Chairperson Mendelson, Grosso, and other members of the committee, thank you for the opportunity to testify. My name is Qubilah Huddleston and I am a Policy Analyst at the DC Fiscal Policy Institute (DCFPI). DCFPI is a non-profit organization that promotes budget choices to address DC's racial and economic inequities through independent research and policy recommendations.

I'm here today to speak about the Critical Risk Rate School Funding Designation Act of 2019 (Critical Risk Rate Act). DCFPI applauds Councilmember Trayon White for introducing this bill, as it has the potential to lead to educational equity in our city. This bill would create an additional "at-risk" weight to provide additional resources to DC Public Schools (DCPS) and public charter schools where at least 70 percent of students are considered at risk of academic failure.

The spirit of this bill is laudable; however, we have several recommendations to ensure that resources are meaningfully targeted to the students we know need additional support the most:

- Before moving this bill forward, the Committee on Education should wait for the Deputy Mayor for Education (DME) to publicly share the results of the 2020 Uniform Per Student Funding Formula (UPSFF) evaluating the effect of adding a school-level at-risk concentration weight to the existing formula.
- Policymakers should explore the viability of a tiered weight, which would acknowledge that schools with lesser, but still high, concentrations of at-risk students also need additional support.
- Policymakers should consider the proposed legislation as part of, not separate from, other at-risk funding reform efforts given the existing challenges within our at-risk funding system.

The Current Landscape of Concentrated At-Risk Student Enrollment in the District

We are in the middle of a school year in which DCPS schools with the highest percentages of at-risk students—most of them in predominantly Black neighborhoods in Wards 7 and 8, where poverty is concentrated—are doing their best in the aftermath of FY 2020 budget cuts.¹ In addition, we know that the District is shortchanging at-risk students in both DCPS and public charter schools by not fully funding the at-risk UPSFF weight at the level school finance experts recommended in the 2013 DC Adequacy Study (Adequacy Study).²

There are currently 45 schools across both sectors that would meet the 70 percent criterion of the Critical Risk Rate Act, based on the Office of State Superintendent's 2018-2019 audited enrollment report (*see appendix*).³ Thirty of these schools are DCPS schools and the remaining 15 are public charter schools. Strikingly, nearly 80 percent of these

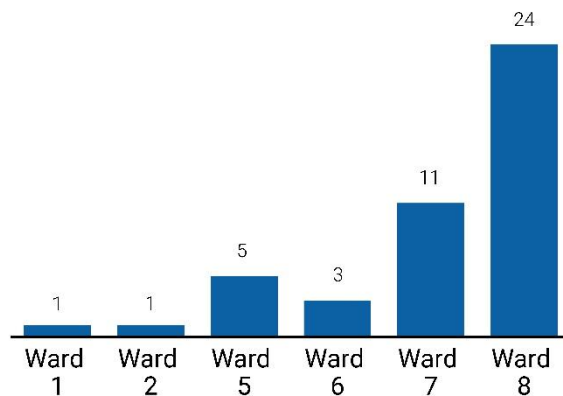
schools are in Wards 7 and 8—a reflection of the ongoing racial and economic segregation that is perpetuating a separate, and unequal education system in DC (*see chart*).

Policymakers Should Use an Evidence-Based Approach to Determine the Design of an At-Risk Concentration Weight

The DME is currently examining the at-risk UPSFF weight, including evaluating the effect of adding a school-level at-risk concentration weight to the existing formula. The Council should wait to move the Critical Risk Rate Act forward until the findings of the DME’s study are published to better ensure that the proposed at-risk concentration weight is designed with the latest evidence to best improve student outcomes.

Schools with 70% or More At-Risk Student Enrollment are Concentrated in Wards 7 and 8

Number of Public Charters and DC Public Schools, School Year 2018-2019



Source: Office of the State Superintendent, 2018-2019 School Year Annual Audit Report Supplemental Tables

DC FISCAL POLICY INSTITUTE | DC-FPI.ORG

In its study, the DME is analyzing several important questions that I also believe policymakers should consider before moving the Critical Risk Rate Act forward:

- What should the “tipping point” or “thresholds” of at-risk concentration be? Should there be multiple tipping points or thresholds?
- What is the impact on schools that fall just below the tipping point(s)?
- Are there potential unintended consequences to implementing a school-level at-risk concentration weight, specifically any that may exacerbate at-risk concentration?
- What are the benefits and deterrents of various implementation mechanisms for the additional funding?

The first question deserves this committee’s attention because despite the large body of research we have about the negative effects of concentrated poverty and other at-risk measures on student outcomes, there is less robust evidence that a singular tipping point for school poverty—that is, a level of school poverty at which there are sharp declines in student outcomes—exists.⁴ For example, researchers in a study on elementary schools in Fairfax County Public Schools (FCPS) in Virginia found evidence of multiple tipping points for which school-level poverty was associated with declines in the number of schools that met state standards in reading.⁵

Researchers first observed declines in the number of FCPS schools meeting state standards beginning at 20 percent school-level poverty. They further found that once schools reached 40 to 45 percent poverty, they were considerably more unlikely to meet state standards, with nearly every school that had a poverty rate of 45 percent or greater failing to meet standards. These tipping points are lower than the threshold proposed in the bill and provide some evidence that a 70 percent threshold might not be the appropriate or only threshold to address the negative effects of concentrated poverty on student achievement.

The question about schools that fall just below the tipping point is also important because under the proposed legislation, schools with an at-risk student population of 69 percent would be ineligible to receive additional funding, although they are likely similar in needs and challenges to schools at the proposed tipping point of 70 percent. Further, without proper provisions, high-at-risk schools that experience minor year-to-year fluctuations in their at-risk enrollment would be vulnerable to seesaw funding even though their needs and challenges are unlikely to change that much on a yearly basis.

As we wait for the DME's findings, policymakers should explore the viability of a **tiered at-risk concentration weight**. A tiered weight would acknowledge that concentrated poverty harms students at different thresholds or within ranges of school-level poverty rather than at one specific level. Under this design, schools with the highest concentrations would still receive the highest amount of additional funds, while allowing other schools with lesser, but still large at-risk student populations, to receive additional support. A tiered weight would also reduce the extent of cliff effects where small year-to-year decreases in the percentage of at-risk students would cause schools to experience abrupt losses in funding.

The District Needs Broader At-Risk Funding Reform to Better Promote Educational Equity

Policymakers should consider an at-risk concentration weight as part of, not separate from, other at-risk funding reform efforts given the existing challenges within our at-risk funding system. Issues within the broader reform include the underfunding of the existing at-risk UPSFF weight, DCPS' routine misallocation of its at-risk funds, lack of budget transparency, and the need for outcomes-based accountability and tracking.⁶

The current at-risk weight is inadequate: The District currently provides an additional \$2,470 per at-risk student in DC's public education budget—40 percent below the level recommended in the Adequacy Study.

DCPS routinely misallocates its at-risk funds: Under an inadequately funded budget, DCPS has routinely diverted its at-risk funds for other purposes, such as core staffing positions, instead of allocating these funds to schools so they can invest in targeted supports for low-income and other students facing barriers. By law, DCPS is required to supplement (add to), not supplant (replace) base funding in school budgets.

School funding lacks transparency: Parents and the public currently are unable to discern basic information about how money allocated for public schools is being spent, especially when it comes to at-risk funding. There is proposed legislation that, if passed by the Council, would be an important step forward toward increasing transparency in both sectors.⁷

Outcomes-based accountability and tracking: There is a lack of consistency in how DCPS and public charter school local education agencies budget their at-risk funds, contributing to the lack of a District-wide systematic review of existing at-risk funded programs or services and their associated outcomes.⁸ This lack of transparency complicates the choices available to school leaders looking to invest in interventions that are proven to boost academic outcomes for students who face significant barriers in and out of the classroom.

Without policymakers committing to a more holistic plan for improving our at-risk funding system, an at-risk concentration weight alone will fall short of meaningfully addressing the needs of our most vulnerable students.

Thank you for the opportunity to testify and I am happy to answer any questions.

Appendix: List of Schools with 70% or More At-Risk Student Enrollment in SY 2018-2019*

*This estimate includes alternative schools or schools that serve adults, which upon further thought, do not receive at-risk funds. Therefore, the number of schools that would qualify under the proposed legislation is slightly smaller.

School Name	Sector	Ward
Washington Metropolitan High School	DCPS	1
Goodwill Excel Center PCS	Charter	2
The Children's Guild PCS	Charter	5
Youth Services Center	DCPS	5
Wheatley Education Campus	Charter	5
Browne Education Campus	Charter	5
Luke C. Moore High School	DCPS	5
Kingsman Academy PCS	Charter	6
Monument Academy PCS	Charter	6
Walker-Jones Education Campus	DCPS	6
Maya Angelou PCS - High School	Charter	7
Friendship PCS - Blow Pierce Elementary School	Charter	7
Cesar Chavez PCS for Public Policy - Parkside Middle School	Charter	7
Friendship PCS - Blow Pierce Middle School	Charter	7
Drew Elementary School	DCPS	7
Aiton Elementary School	DCPS	7
C.W. Harris Elementary School	DCPS	7
Sousa Middle School	DCPS	7
Plummer Elementary School	DCPS	7
Kimball Elementary School @ Davis	DCPS	7
Thomas Elementary School	DCPS	7
AppleTree Early Learning Center PCS - Douglas Knoll	Charter	8
Rocketship DC PCS - Rise Academy	Charter	8
Democracy Prep Congress Heights PCS	Charter	8
National Collegiate Preparatory PCHS	Charter	8
Friendship PCS - Southeast Elementary School	Charter	8
Somerset Preparatory Academy PCS	Charter	8
Early Childhood Academy PCS	Charter	8
Kramer Middle School	DCPS	8
Malcolm X Elementary School @ Green	DCPS	8
Johnson Middle School	DCPS	8
Savoy Elementary School	DCPS	8
Garfield Elementary School	DCPS	8
Ketcham Elementary School	DCPS	8
King Elementary School	DCPS	8
Anacostia High School	DCPS	8
Moten Elementary School	DCPS	8
Hart Middle School	DCPS	8
Excel Academy	DCPS	8
Hendley Elementary School	DCPS	8

¹ Ed Lazere, “What’s in the Approved Fiscal Year 2020 Budget for PreK-12 Education?,” DC Fiscal Policy Institute, October 25, 2019, <https://www.dcfpi.org/all/whats-in-the-approved-fiscal-year-2020-budget-for-prek-12-education/>.

² Alyssa Noth, “Educational Equity Requires an Adequate School Budget,” DC Fiscal Policy Institute, December 2, 2019, <https://www.dcfpi.org/all/educational-equity-requires-an-adequate-school-budget/>.

³ Office of the State Superintendent, 2018-2019 School Year Annual Audit Report Data Supplemental Tables, <https://osse.dc.gov/node/1390091>.

⁴ Roslyn Arlin Mickelson, “Is There Systematic Meaningful Evidence of School Poverty Thresholds?,” The National Coalition on School Diversity, Research Brief, September 2018, https://school-diversity.org/wp-content/uploads/2018/09/NCSD_Brief14.pdf.

⁵ Fairfax County Public Schools, “Socio-Economic Tipping Point Study of Elementary Schools,” July 2013, [https://www.boarddocs.com/vsba/fairfax/Board.nsf/files/9DG4KP71B0DB/\\$file/fcps_tipping-point.pdf](https://www.boarddocs.com/vsba/fairfax/Board.nsf/files/9DG4KP71B0DB/$file/fcps_tipping-point.pdf).

⁶ Qubilah Huddleston, “Money Matters: Adequate and Targeted Education Funding Can Boost Student Outcomes, Reduce Opportunity Gaps, DCFPI, February 26, 2020, <https://www.dcfpi.org/all/money-matters/>; Alyssa Noth and Qubilah Huddleston, “Ensuring Lawmakers Fully Fund DC Schools This Budget Season: 4 Facts You Need to Know,” DCFPI, February 19, 2020, <https://www.dcfpi.org/all/ensuring-lawmakers-fully-fund-all-dc-schools-this-budget-season-4-facts-you-need-to-know/>.

⁷ B3-0239, School Based Budgeting and Transparency Amendment Act of 2019, <http://lims.dccouncil.us/Legislation/B23-0239?FromSearchResults=true>.

⁸ Office of the DC Auditor, “DC Schools Shortchange At-Risk Students,” June 26, 2019, <http://dcauditor.org/report/d-c-schools-shortchange-at-risk-students/>.