New York City Department of Education

Regulatory Task Force Report on Academic Policy

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Regulatory Task Force on Academic Policy

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Table of Contents

Background

The Regulatory Task Force on Academic Policy was formed in August 2015 to ensure that schools implement State and City regulations with fidelity so that students receive the academic programs to which they are entitled. The Task Force drives this work by shaping the development of oversight, training, and support strategies to build schools' capacity to understand and apply these policies. The Task Force also informs the development and revision of local academic policy to further support high quality academic programs across the New York City Department of Education (DOE). The DOE's Office of Academic Policy and Systems (OAPS) within the Division of Teaching and Learning oversees these policies.

In conducting the efforts described in this report, the DOE used its two main student data systems: ATS and STARS. Schools use ATS to manage student biographical data, enrollment, attendance, and grade promotion. Schools use STARS to produce official academic records, such as report cards and transcripts. All district DOE schools must enter and maintain accurate student data in these systems. OAPS uses data from ATS and STARS to conduct the oversight efforts described in this report.

OAPS has expanded its policy oversight and support strategies for 2015-16 to further reinforce high- quality policy implementation across the DOE. These strategies include the following components:

- **Oversight.** OAPS reviewed student data for alignment to academic policy in the areas of credit recovery and online learning. Findings were used to inform interventions at schools.
- **Support and intervention.** Dedicated content experts in Borough Field Support Centers (BFSCs) assist schools in implementing academic policy effectively.
- **Supervision.** Superintendents reinforce policy expectations and ensure that principals attend mandatory professional development.
- **Professional development for principals.** All principals must attend academic policy trainings.
- **Policy and systems assessment.** Based on findings from monitoring and intervention, OAPS issues revised guidance on key policies and procedures.

This report describes the efforts conducted between July 2015 and January 2016 in alignment with the above strategies to ensure that schools have a thorough understanding of academic policy expectations.

Oversight

For 2015-16, OAPS has expanded efforts to monitor academic data in real time. The goal of this monitoring is to address policy misunderstandings before they result in negative outcomes for students. OAPS prepares and shares student-level reports with BFSCs in order to target academic policy support, notify schools of instances where their practices may not align with academic policy, and identify areas in which schools need additional intervention. The Task Force will report any misconduct that is uncovered through this oversight.

Oversight conducted in the fall of 2015-16 focused on the areas of credit recovery and online learning.

Credit Recovery

When high school students fail required courses, New York State policy allows schools to provide make- up opportunities in two ways: students may repeat the course they have failed in a subsequent semester, or they may participate in targeted credit recovery. Credit recovery is appropriate only in cases where a student has failed to master specific units, assignments, or assessments from the failed course. The student works on his or her deficiencies under the supervision of a subject-certified teacher and receives credit if he or she successfully masters the required content.

Since credit recovery is a highly individualized learning experience, the DOE introduced strict policies in February 2012 to ensure that credit recovery is offered appropriately. Concurrently, the use of credit recovery has dropped over tenfold; in 2014-15, credit recovery accounted for only 0.15% of total credits earned, compared to 1.7% in 2011-12.

To ensure that students participating in credit recovery receive appropriate instructional experiences, OAPS reviewed student- and course-level data to identify schools that use credit recovery significantly or where the data indicates potential misalignment to policy. Criteria for selecting schools for this review included the following:

- The school appears to have more than 5% of students enrolled in a credit recovery course, or
- The school has at least one credit recovery section without a teacher assigned in STARS, or
- The school has at least one student scheduled to earn more than three core credits in credit recovery.

Eight percent of district DOE high schools (39 schools) met at least one of the criteria above. For these schools, BFSCs collected qualitative information about the procedures for designing credit recovery programs and offering them to individual students. OAPS also reviewed the certifications of the teachers assigned to these courses. This review uncovered the following findings for these schools:

- No further action was required with respect to credit recovery in more than half of these schools (22 schools) based on the following:
  - The credit recovery processes aligned to DOE policy expectations for determining whether to offer these courses to individual students; or
  - The identified courses were not credit recovery. Non-credit recovery courses were incorrectly labeled with codes that are intended for credit recovery. These schools will receive support to code courses correctly in the next term. OAPS will review schedules to confirm that courses are being coded correctly.

- Additional action may be required for the credit recovery programs in the remaining identified schools (17 schools) due to the following:
  o There are apparent gaps in the schools' procedures for determining student eligibility. These schools will receive targeted support and intervention from their BFSCs to correct their procedures when necessary. Schools without adequate credit recovery eligibility procedures after additional intervention will not be permitted to continue their credit recovery programs; and/or
  o At least one credit recovery course was apparently taught by a teacher who was not certified in the subject area. These schools will receive targeted support to correct their credit recovery programs; schools unable to assign a certified teacher to credit recovery courses will not be permitted to continue credit recovery programs in those subjects.

Online Learning

Online courses incorporate digital learning into traditional classroom experiences. Schools may choose to offer online learning to provide more individualized, self-paced instruction to their students. In DOE schools, online learning is governed by specific State and City policies designed to ensure that these courses are comparable to traditional credit-bearing courses. For example, these courses must be overseen by a subject-certified teacher who interacts with students and assesses their progress frequently throughout the course. Online courses without teacher interaction are not permitted.

To ensure that online learning is implemented in alignment with DOE policies, OAPS reviewed student- and course-level data to identify schools that use online learning significantly or where the data indicates potential misalignment to policy. Criteria for selecting schools for this review included the following:

- The school has scheduled at least 10% of students for credit-bearing, online courses, or
- The school has at least one credit recovery section without a teacher assigned in STARS, or
- The school has at least one student scheduled for four or more credits in online courses.

Ten percent of district DOE high schools (50 schools) met at least one of the criteria above. For these schools, BFSCs collected qualitative information about the procedures for designing online programs. OAPS also reviewed the certifications of the teachers assigned to these courses. This review uncovered the following findings for these schools:

- No further action was required with respect to online learning in more than half of these schools (31 schools) based on the following:
  o The online learning programs aligned to DOE expectations with respect to instructional time; or
  o The identified courses were not online courses. Non-online courses were incorrectly labeled with codes that are intended for online courses. The BFSC will provide support to code courses correctly in the next term, and OAPS will review schedules for alignment to coding expectations.
- Additional action is required for the online programs in the remaining identified schools (19 schools) due to the following:
  o There were apparent gaps in the schools' procedures for designing online learning experiences that are comparable to traditional courses and incorporate substantial

student-teacher interaction. These schools will receive targeted support and intervention from their BFSCs to correct their procedures when necessary. Schools without adequate course time or teacher interaction will not be permitted to continue their online programs; and/or

o   At least one online course was apparently taught by a teacher who was not certified in the subject area. These schools will receive targeted support to correct their online programs. Schools that are unable to assign a certified teacher to their online courses will not be permitted to continue those courses.

Support and Intervention

Borough Field Support Centers

In addition to conducting the targeted oversight described above, BFSCs provide ongoing support to schools in all areas of academic policy. For the first time in 2015-16, each BFSC has dedicated staff— academic policy and systems leads—who serve as content experts. As of January 2016, 56 academic policy and systems leads work across the BFSCs.

Academic policy and systems leads in BFSCs support schools in the following ways:

- BFSCs review and provide recommendations in response to schools' questions about academic policies and systems. These questions include general inquiries about graduation and programming policies and specific inquiries about individual students.
- BFSCs provide mandatory professional development to principals and deliver supplementary professional development to administrators, guidance counselors, programmers, and other staff based on their schools' needs.
- BFSCs monitor the completion of required tasks throughout the school year, including programming, grade entry, and graduation.
- Where needed, BFSCs support schools in implementing changes to their programs and practices, engaging Superintendents as necessary.

OAPS provides full-day professional development to BFSC leads several times throughout the school year. These trainings build BFSCs' capacity to understand and apply academic policy equitably across the different contexts of their schools. These trainings also provide BFSCs with opportunities to develop their expertise of ATS and STARS so they can support schools in managing student data. Professional development is facilitated by policy and systems experts in OAPS.

Between July 2015 and January 2016, OAPS conducted four full-day trainings for academic policy and systems leads in BFSCs. Training topics for the year include the following:

- High school graduation requirements
- Programming requirements
- Awarding high school course credit
- Making up course credit
- Grade entry and student report cards

- Managing student data in ATS and STARS
- Graduation certification
- Student promotion
- Updating student transcripts
- Transcript evaluation for transfer students
- Documenting course content

In addition to this professional development, OAPS provides ongoing support to BFSC leads through a dedicated helpdesk, bi-weekly meetings, office hours, and an online repository of resources to assist BFSCs in supporting their schools.

Intervention

For the first time in 2015-16, schools with policy implementation challenges or discrepancies in student data will complete targeted intervention plans with the support of their BFSCs to ensure that they have adequate procedures in place. As part of this process, OAPS prescribes a set of intervention standards tailored to the needs of schools based on concerns identified through data monitoring and other activities.

The intervention process is designed to identify and address the root problems leading to discrepancies in schools' data and practices. As the first step in any intervention, BFSCs analyze the prevalence of the academic policy concerns identified at the school. Based on their findings, the BFSC provides the school with a tiered set of interventions designed to prevent the recurrence of these issues. These interventions may include, but are not limited to, the following actions:

- School staff members—including administrators, programmers, guidance counselors, and others as appropriate—receive training from their BFSC regarding specific policies and procedures.
- The BFSC reviews the school's existing procedures for managing academic data and collaborates with school staff to identify and implement steps to improve these structures.
- The BFSC reviews the school's STARS data, such as their master schedule, to ensure that the school's course offerings align to academic requirements.
- In specific cases, the BFSC requires schools to use specific forms and procedures and signs off on certain data transactions before they are entered into the data systems.

An example of the intervention process is provided in Appendix A – Sample Intervention Plan.

Supervision

Superintendents reinforce the expectation that principals and their administrative staff familiarize themselves with the available academic policy resources and understand the importance of adhering to the policies. In August 2015, all Superintendents overseeing high schools and secondary schools received professional development from OAPS to understand the policies pertaining to graduation, programming, and grading. Additionally, in September 2015, Superintendents attested to ensuring that each principal under his or her supervision will participate in all mandatory academic policy professional development throughout 2015-16.

Superintendents' teams work in partnership with BFSCs on an ongoing basis in cases where specific schools need intensive, targeted support improving their alignment to policy.

In addition to targeted support, OAPS provides communications through two weekly publications for both principals and field support staff, *Principals' Weekly* and *Field Support for Schools*, respectively. Thus far in the 2015-16 school year, OAPS published announcements that included the following topics:

- Policies pertaining to special student populations
- Reviewing staff access to student data systems
- Regents exam eligibility requirements
- Middle school testing requirements
- Supporting students who are returning from court-ordered settings
- Completion of required scheduling in STARS
- Policies on student records requests
- Student promotion policy

Professional Development for Principals

For the first time in 2015-16, all principals must attend mandatory academic policy and systems professional development. This professional development is hosted by Superintendents and facilitated by BFSCs. BFSC presenters use a standardized set of materials and activities provided by OAPS to ensure that schools have a shared understanding of the State and City policies related to academic requirements.

Principals serving high school grades will attend four trainings, and principals serving elementary and middle school grades will attend one training. As of January 2016, 94% of high school principals attended the first of four mandatory academic policy trainings. New principals and principals who do not attend any of the required sessions must attend makeup sessions provided by BFSCs.

To reinforce the importance of this professional development, attendance at the mandatory trainings has been added to the Compliance Checklist overseen by the DOE's Office of Compliance Services. As an arm of the Office of the General Counsel, the Office of Compliance Services supports principals, schools, and program offices across the DOE to ensure compliance with Federal and State laws, Chancellor's Regulations, and DOE policies. Principals' compliance in attending the required trainings will be shared with Superintendents to inform supervision, and a final compliance rate will be issued to all principals after the end of the school year.

Policy and Systems Assessment

The academic policy oversight efforts described in this report assist OAPS in assessing whether schools need improved guidance on policies and procedures in order to implement academic policy effectively. Between September 2015 and January 2016, OAPS has focused on clarifying the policy expectations in the areas of transcript updates and online courses.

Policy Development: Transcript Updates

Students' transcripts contain their final grades in all the courses they have taken throughout high school. In certain circumstances, school staff members are permitted to update student transcripts to reflect additions or corrections. These updates may include adding transfer credits from other school districts,

correcting grades that were entered incorrectly, and updating grades of "incomplete" upon the completion of outstanding work.

Outreach and feedback from schools throughout 2014-15 surfaced a need for greater standardization of school-based processes for performing transcript updates. In developing their own transcript update forms, schools sometimes omit key pieces of information to support the update. School staff may also be unclear as to the specific supporting documentation required and whether or not documentation is necessary based on the type of transcript update.

For 2015-16, OAPS has designed the following policy and systems updates to support higher-quality transcript updates at high schools:

- **Mandatory transcript update form:** Starting February 2, 2016, OAPS will require schools to use a standardized transcript update form. This form clearly outlines the supplementary documentation required to support each transcript update, which must be attached to the form. For example, each transcript update associated with a grade calculation error must be supported by a copy of the teacher's grade book. This form is provided in Appendix B –Transcript Update Form (Front).
- **Enhanced STARS functionality:** OAPS has updated the transcript update functionality in STARS to align directly with the data contained on the standard transcript update form. Schools are required to enter specific information about the transcript update into STARS before it is approved by a school administrator.

These efforts improve OAPS's ability to monitor transcript updates and encourage greater accuracy in student records.

Policy Clarification and Support: Online Learning

Based on the monitoring described in this report, feedback from BFSCs, questions received from schools during professional development, and ongoing policy support to schools, OAPS has observed that schools sometimes misinterpret the online learning policies described in State and City guidance. Specifically, schools request clarification on how frequently teachers and students should interact and how to ensure that the course content is comparable to that provided in a traditional course. As a result, OAPS has strengthened existing policy guidance on online learning and identified examples of best practices for implementation from schools currently offering these programs. Revised policy guidance will be communicated to principals, Superintendents, and BFSCs in February 2016.

Future Work

Throughout the spring of 2015-16, OAPS will continue to expand upon the efforts described in this report in the following ways:

Oversight. In addition to continuing to monitor the aforementioned topics, OAPS will review data on the completion of graduation requirements, transcripts updates, programming, and graduation appeals.

Support and intervention. BFSCs and Superintendents will continue to ensure that schools are supported in implementing academic policy successfully. BFSCs will have ongoing access to training, resources, and

direct support from OAPS. Schools with evidence of misalignment to policy will continue to receive targeted intervention plans from their BFSCs.

Supervision. Superintendents will maintain policy expectations and ensure that principals attend mandatory professional development.

Professional development for principals. Principals will attend the remaining lessons of the mandatory academic policy professional development series. Compliance with training expectations will be assessed on the Compliance Checklist.

Policy and systems assessment. OAPS will evaluate the need to develop additional policy guidance in specific policy areas as evidence indicates a need.

Appendix A – Sample Intervention Plan

Tasks	Timing
• **Analyze the prevalence of the concern** ○ The BFSC will review the school's Progress to Graduation Tracker, a small subset of other transcripts, and the school's master schedule to determine if the issue was student-specific or if it reveals a broader, school-wide challenge, and will investigate further within the same subject area.	• During this term
• **Remind schools of the relevant policies** ○ The BFSC will give the principal, assistant principals, guidance counselors, programmers, and others at the school related policy training (or, if appropriate, share the resources, tools, and FAQs via email or phone). Topics might include graduation requirements, crediting and coding rules, use of override codes in GRDT and DISC, and any specific policies related to the school's audit failure (e.g., physical education). This will help ensure the school understands any policies that may have led to the failure in the past.	• During this term
• **Review current course codes and titles** ○ The BFSC will review the current offerings at the school to make sure that course codes and titles are aligned.	• By beginning of next term, following schools' course offering decisions

• **If course coding misalignment is a broad, school-wide issue, require use of the course accreditation form for affected courses or subject areas**
  ○ The BFSC may choose to require the use of the accreditation committee course approval form.
  ○ For schools where the audit revealed a misalignment between the course, syllabus, and the standards taught, the Borough Instructional Leads may offer support to ensure students are receiving required content in the exception subject area.
	• At the beginning of next term

• **If graduates not meeting minimum requirements is a broad, school-wide issue, BFSC and school must review, document, and sign off on school certification procedures** ○ The BFSC may choose to, at their discretion, work with the school to strengthen their graduation certification process, including walking through the certification guide and requiring the school to detail exactly who signs off on graduates.	• At the beginning of next term
• **If this is a broad, school-wide issue, OAPS may share additional data with BFSCs as needed** ○ e.g., OAPS may provide data to indicate if select seniors are programmed appropriately.	• At the beginning of next term

Appendix B –Transcript Update Form (Front)

TRANSCRIPT UPDATE FORM

Student name: _____ Student ID#: _____ Date: _____

Requester name: _____ Requester title: _____

Reason for Transcript Update		Required Documentation
This form is incomplete without the supporting documentation listed and the principal's signature. Attach originals or photocopies to this form and retain permanently for future reference.		
Add a new course	☐ Transfer Credit(s) from another school or program	☐ (1) Official transcript from student's previous school/institution (translated into English if in another language) AND ☐ (2) Transfer credit equivalency form
	☐ LOTE credit(s) for documented residence and school attendance in an "other-than-English-speaking" environment	☐ Record of student residency and school attendance (e.g. the transcript from the previous school, report card, or letter of enrollment)
	☐ Credit-by-examination	☐ Documentation of completed project or oral exam (e.g. rubric, copy of assignments)
	☐ Participation in PSAL or other school-based team or physical activity for PE credit, in accordance with New York State and City PE policy	☐ (1) Student log of practice hours AND ☐ (2) Roster signed by coach
	☐ Service hours documenting student's progress toward the service seal	☐ Service hours worksheet
Change an existing grade	☐ Annualization update	☐ Written grading policy explaining when annualization is appropriate
	☐ Grade calculation/entry error	☐ Teacher's grade book (photocopy or printout is sufficient)
	☐ Grade update based on completion of outstanding coursework (marks of incomplete ['NX'] or recent admit ['NL'] only; this may not be used for credit recovery)	☐ (1) Teacher's grade book AND ☐ (2) Written grading policy explaining school's policy for use of these marks
	☐ Principal change in accordance with contract	☐ Rationale for grade change from principal
Add or Change exam	☐ 11th or 12th grade new admit waiver for Global History & Geography Regents or 12th grade new admit waiver for science Regents ['WA']	The student's admission and discharge history in ATS serves as evidence; therefore no additional documentation is required.
	☐ Regents exam completed at a non-DOE school in New York State	☐ Student's Regents exam cover sheet OR official transcript from the New York State school with the Regents exam grade
	☐ New York State-approved alternative to a Regents exam ['WX']	☐ Student's exam score report
	☐ Performance-Based Assessment Task (PBAT) for approved schools	☐ PBAT cover sheet or rubric with final score
	☐ Successful appeal to graduate with a low score on a Regents exam ['WG']	Superintendent approval of these appeals is documented via the RQSA screen in ATS; therefore no additional documentation is required.
Remove an exam or course	☐ Remove an exam due to duplication or error ☐ Remove a course due to duplication or error	☐ Rationale and explanation

Appendix B – Transcript Update Form (Back)

Term	Year	Course Code	Course Title	Original Grade/Score (if applicable)	New Grade or Score (if applicable)

For School Office use (optional)	Date Entered in STARS:
Entered by name/title ("requester"):	
Approved by name/title ("approver"):	

Required signature

Principal name: _____   Principal signature: _____

Date: _____