

October 30, 2015

Mike Kirst, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

Via email only (sbe@cde.ca.gov)

*Re: SBE November 2015 Agenda Item #11: Developing a New Accountability System/
Update on the Local Control Funding Formula Evaluation Rubrics*

Dear President Kirst:

We represent a coalition of civil rights, advocacy, community, parent, student and other organizations who have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF). LCFF creates an historic opportunity to focus resources on helping California's neediest students overcome the barriers they face in closing the achievement gap and graduating college and career ready. It also promises a new level of transparency and local engagement for parents, students, and community members in the design of their local schools. As you know, in an effort to give life to these objectives, we have commented jointly multiple times over the last year regarding the State Board of Education's LCFF regulatory proposals and evaluation rubrics/accountability system items.

With these comments, we wish to (a) reiterate our coalition's topline points regarding the current draft WestEd rubric design and (b) provide you with some concrete examples of potential approaches to addressing some of the concerns we have identified.

As an initial matter, we address two overarching points. First, *we were surprised to see the staff memo for this item characterize the State Board as having "endorsed" any aspect of the WestEd draft proposal*, and in particular the three "policy statement" categories around which the rubrics draft is designed (Access & Opportunity; Graduation; College & Career). The entire draft thus far has been presented to the Board as an open, evolving conceptual draft that is no way set in stone. Accordingly, there was no formal action requested of nor taken by the Board concerning endorsement, and counter-proposals for the policy statements such as that presented by the Coalition continue to provide important alternative approaches that should be in the mix of ideas when the Board as a whole actually discusses and decides on key components of the rubrics' design. Importantly, such alternative approaches should also be part of the user-testing process.

Secondly, *we are concerned that the Board is proceeding to abandon the API without first ensuring a new accountability system is in place*. We agree that the current API may not be well-aligned to California's emerging accountability system and that it is appropriate to recommend that the legislature amend the *Education Code* to replace the API. That said, it continues to be important for parents, the public and state and local policymakers to be able to easily assess the quality of their local schools and LEAs. It is also important that all stakeholders understand how that assessment of quality prompts technical assistance or interventions. As such, it is imperative that—within the timeline being contemplated by the SBE for abandoning the API—a new accountability framework (and the significant legislative changes necessary to accomplish this) be identified and adopted.

Recommendations for Changes to the Current Evaluation Rubrics Draft

We reiterate our appreciation for the significant amount of thought and hard work invested into this effort by staff at the SBE, CDE and WestEd and the progress made to date. We offer these recommendations in the spirit of further advancing the conversation.

1. *Restructure the “SBE Policy Statements” to Ensure the School System Drives Students Toward College and Career Readiness and Not Merely Graduation*

As noted in our letter from the September meeting (attached, Section II.A, beginning on page 3), the current WestEd approach identifies three key categories—Access and Opportunity, Graduation, and College and Career Readiness—as “SBE Policy Statements” that will drive the overarching design of the proposed evaluation rubrics and propose a structure for organizing the 8 state priorities and the associated metrics. Those three statements include one about ensuring that students are college and career ready and a separate statement about ensuring that all students graduate from high school.

We think this structuring is problematic for various reasons. Chief among them, it communicates that a key objective of our education system is simply to graduate students *no matter what* knowledge, skills or abilities they may possess. As was [recently shared at an LCFF convening](#) in Los Angeles, some students are concerned that “the[ir] district just wants them to graduate but offers little support in what it takes to get accepted to a good college. **‘It seems like they just want to kick us out of high school, not kick us into college,’** one student said.”

Additionally, this framing conflates the *process* of receiving an education throughout one’s years in schools that prepares one ultimately to graduate college and career ready with the actual *outcome* of graduating college and career ready. Accordingly, we proposed the following revisions to this foundational set of statements:

- All students are provided with access and opportunities that support learning;
- All students are on track to graduate college and career ready, exhibiting early and continuing signs in elementary, middle and high school of college and career readiness;
- All students graduate from high school college and career ready.

Our September letter provides more detail on the benefits of our proposed alternative. Rather than repeating those points here, we refer you to the attached letter. We also attach a sample re-working of the policy statements and the key and associated indicators aligned to them, by way of illustration.

We have yet to hear an adequate explanation for making graduation—regardless of the skills or knowledge imparted to students—an overarching goal of our K-12 system. *We do not understand the rationale for importing a shortcoming of our old system—i.e., the lack of correlation between graduation and college and career readiness—into the core of our new accountability system.* **We hope you will address this question at the upcoming meeting and require that our counter-proposal for the policy statements also be part of the user-testing heading to the field.**

2. *Equity Considerations Should Be Reflected in the Summary Display at the LEA and School Level.*

We believe equity is a critical component of district-level or school-level performance and should therefore be incorporated into the summary display format. Put differently, we believe that “equity” considerations must be incorporated into the high-level reflection of overall performance at the LEA and school level, not simply “outcome” and “improvement”. **No LEA’s overall performance should be**

deemed acceptable or good, etc., if it is masking significant inequities in subgroup outcomes or growth.

We have attached two possible scenarios illustrating how the equity gap-closing could be made a much-needed third dimension (beyond outcome and growth) for judging school quality. We also note that various other states including Texas, Massachusetts, Kentucky and Michigan—all of which more closely resemble California’s diversity than Alberta, Canada—have included equity analyses in some way in their accountability systems.

Note, the attached samples are just an initial attempt at making equity visible and highlighted as a significant aspect of the rubrics. The LCFF Equity Coalition will be meeting in November to recommend some additional modifications to these attachments as well as exploring the development of other possible options to forward to the Board for consideration. Similarly, the Coalition is not endorsing Texas nor any other states’ particular approach at this time; rather we reference them as proof points that states can and do prioritize subgroup gap-closing in their accountability systems. We will be doing further analyses of these other states’ approaches and would be happy to share our thinking about them.

3. Identify Key Indicators/Metrics within Grade Spans that Prompt Further Inquiry through Linkages to Other Indicators/Metrics

We appreciate the work that WestEd and staff have done to map the interrelationship among various metrics and to begin framing a method for presenting data. As noted in our September letter, we were generally supportive of the direction of the conceptual draft, which has not changed materially from the materials distributed for User Acceptance Testing. We recognize the need to narrow or prioritize focus, particularly when it comes to the self-assessment process for LEAs and when identifying areas where technical assistance, support, or intervention should focus, among the many metrics that should ultimately be included in the evaluation rubrics.

Our general support for the framework, however, does not mean we endorse the preliminary identification of which indicators/metrics are “key” and which are associated/related. We continue to believe it is critical that the Board carefully vet the selection of key indicators with the policy stakeholders and affected constituency groups before finalizing those details and look forward to working with you in that process. Moreover, we continue to believe that the key indicators must encompass the full range of the LEA’s education program, i.e., that they are developed to flag issues and identify strengths *at each relevant grade span*, and that the final product include multiple key indicators for a particular grade span that reflect different aspects of what student success looks like. The attached sample re-working of the policy statements referenced in Section II.A, reflects at least one alternate approach that is consistent with our recommendations.

Because this key component of the rubrics remains a work in progress and there were only minor changes from the conceptual draft presented at the September meeting, we do not repeat the full explanation of this concern and possible solutions and instead refer you to our letter for the September meeting (attached, Section II.C, beginning on page 5). We look forward to working with you and staff to refine the framework and the metrics and their summary in the indicators so as to best help guide self-assessment and support for all aspects of LEAs’ educational programs.

4. Where Standards are Locally Determined, They Should be Research-Based, Aligned with SBE-approved Parameters and Set Through Community Stakeholder Processes.

We believe that locally-determined metrics that measure progress on the eight state priorities and are used to satisfy the statutory requirement for district and schoolsite standards in those areas should

meet a uniform standard, both in terms of the types of metrics approved and the process by which they are determined. Specifically, we propose that such metrics should be selected by LEAs from a list of metrics which the SBE has certified for use by LEAs as sufficiently research-based. LEAs, in choosing which metrics to adopt and where to set their performance and growth expectations, should be required to consult with the same set of stakeholders the LEA consults with in developing its LCAP, including Parent Advisory Committees, ELACs and DELACs. Also, LEAs should be required to track performance on their adopted metrics over time and should be required to maintain adopted metrics for a minimum of five years so as to assure that local metrics are not changed out so often as to prove unhelpful and to help build evidence and experience across the state of useful locally-determined metrics. In addition, LEAs may adopt additional metrics to measure progress in priority areas that are entirely at the discretion of the local LEA and local stakeholders.

* * *

Before closing, we wish to express appreciation to staff and WestEd for responding to our concern with the prior conceptual draft's labeling as "acceptable" performance on a quality standard anywhere from the 25th to 75th percentile of the LEA distribution on that indicator. The updated materials distributed for the User Acceptance Testing labels this band of the distribution as "Emerging." We believe this change appropriately ensures that the rubrics and whatever aspects of the broader accountability system build on the rubrics do not communicate that being well below average in performance is acceptable, which would be inconsistent with the goal of encouraging continuous improvement. The change does, however, bring us back to one of our overarching comments above concerning the need to have in place a complete accountability system and not simply the rubrics. It is difficult to assess the value of many of the proposed rubrics components without knowing what consequence will flow from any particular proposal as part of the broader accountability framework. Since we do not yet know what it means to be "Emerging" versus "Acceptable" (or "Concern" or "Issue") and how such districts will be supported to continuously improve or (we hope not) allowed to mask continuing problems, we cannot yet judge the ultimate value of this improvement.

Thank you for the opportunity to comment. We very much appreciate meeting with the two Board members and the staff who were willing to sit down with Coalition members and discuss our concerns. We look forward to continuing working with the State Board of Education to realize the full promise of LCFF.

Sincerely,

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Managing Attorney
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Marvin Andrade
Leadership Development Director
Asian Americans Advancing Justice | Los Angeles

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Bryan Ha
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Taryn Ishida
Executive Director
Californians for Justice

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Dave Sapp
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Alternative to WestEd LCFF Evaluation Rubrics

WestEd's 3 Categories

Access & Opportunity

Graduation

Key Indicators:

- **Graduation rate**
- Attendance rate by grade span (elementary, intermediate and high)

Associated Indicators:

- Middle school dropout
- High school dropout
- Chronic absenteeism
- Expulsion rate
- Suspension rate
- Local measures of graduation

College & Career Readiness

Key Indicators:

- % of 12th graders completing A-G and/or CTE pathway
- % of 3rd grade students reading at grade level
- % of 8th grade students at or meeting grade level math standards

Associated Indicators:

- Early Assessment Program or equivalent
- AP participation and passage
- **School climate survey results**
- **English Learner progress**
- Local measures of College & Career Readiness

Alternative 3 Categories

Access & Opportunity

On Track to Graduate College & Career Ready

Note: Key Indicators listed under the Alternative are just for illustrative purposes to demonstrate how the reorganization could play out, but is not intended to represent a concrete recommendation.

Key Indicators:

- Attendance/Chronic absence
- % of 3rd grade students reading at grade level (*switched categories*)
- % of 8th grade students at or meeting grade level math standards (*switched categories*)
- Suspension rate (*elevated to key indicator*)
- **English Learner progress (*switched categories and elevated to key indicator*)**
- **Parental involvement (*switched categories from Access & Opportunity and elevated to key indicator*)**

Associated Indicators:

- Middle school dropout
- High school dropout
- Expulsion rate
- Local measures of graduation
- **School climate survey results (*switched categories*)**

Graduating College & Career Ready

Key Indicators:

- **Graduation rate (*switched categories*)**
- % of 12th graders completing A-G (*key indicator strengthened*)
- % of 12th graders completing CTE pathway (*key indicator strengthened*)
- **Early Assessment Program equivalent / % of 11th graders meeting standards on 11th grade assessments (*elevated to key indicator*)**

Associated Indicators:

- AP participation and passage
- Local measures of College & Career Readiness

Advantages of Alternative 3 Categories

- ✓ More focus on lower grades
 - Don't dilute "on track" indicators by combining with 12th grade/graduation indicators
 - Inclusion of more "on track" metrics as key indicators
- ✓ No arbitrary distinction between on-track/early graduation vs. college/career readiness related metrics
- ✓ Simply graduating students, regardless of the skills and knowledge they possess, should not be a goal around which the entire system is organized
- ✓ Opportunity to include more key indicators showing college/career readiness
- ✓ Consistent with inputs/process/outcomes approach as articulated by David Conley

**Evaluation Rubric Design Should Foster Equity by Explicitly Incorporating Equity Principles into
The Top-Level Summary Display *and* Including Equity as a Component of Overall LEA Performance**

1. **No LEA's overall performance should be deemed acceptable if it is masking significant inequities in subgroup outcomes or growth.**
 - Equity should be incorporated into the summary display or otherwise incorporated into assessing overall performance along with the dimensions of improving outcomes and growth.
 - Below are two examples of how this could be accomplished in the top-level LEA display.

Option 1

LEA	Results			Improvement	Outcome	Equity	Overall	Aggregate
	1 Year	3-Year Ave	State Ave					
Graduation Rate	88.5%	88.4%	80.8%	Maintained	High	Issue	Acceptable	Acceptable
Attendance -- Elementary	95.0%	95.0%	94.5%	Maintained	Intermediate	Good	Acceptable	
Attendance -- Intermediate	92.5%	93.1%	93.0%	Declined	Intermediate	Good	Issue	
Attendance -- High School	93.5%	93.2%	92.8%	Maintained	High	Issue	Acceptable	

Note: This assumes a “rolled up” aggregate computation or analysis of all relevant subgroups and either ranking relative to other LEAs or rating based on some standard, which could include the statutory standard for COE assistance.

Option 2

LEA	Results			Improvement	Outcome	Overall	Aggregate
	1 Year	3-Year Ave	State Ave				
Graduation Rate	88.5%	88.4%	80.8%	Maintained	High	Good	Acceptable
Attendance -- Elementary	95.0%	95.0%	94.5%	Maintained	Intermediate	Acceptable	
Attendance -- Intermediate	92.5%	93.1%	93.0%	Declined	Intermediate	Issue	
Attendance -- High School	93.5%	93.2%	92.8%	Maintained	High	Good	
Subgroup Analysis	Low-income students, African American students, English learners						

Note: This approach includes a summative prose-based statement of the subgroups for which they are “issues” in the aggregate report generated for each subgroup, which could be accessed through a click-through.

2. **When assessing subgroup performance and gaps, the rubrics should compare [all subgroup A students] vs. [all non-subgroup A students].**
 - The proposed analysis of [all subgroup A student] vs. [all students] double counts subgroup A students and dilutes the true gaps.

August 28, 2015

Mike Kirst, President
California State Board of Education
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Via email only (sbe@cde.ca.gov)

Re: SBE September 2015 Agenda Item #14 – Evaluation Rubrics/Accountability System

Dear President Kirst:

We represent a coalition of civil rights, advocacy, community, parent, student and other organizations who have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF). LCFF creates an historic opportunity to focus resources on helping California's neediest students overcome the barriers they face in closing the achievement gap and graduating college and career ready. It also promises a new level of transparency and local engagement for parents, students, and community members in the design of their local schools. As you know, in an effort to give life to these objectives, we have commented jointly multiple times over the last year regarding the State Board of Education's LCFF regulatory proposals and evaluation rubrics/accountability system items.

With these comments, we wish to (a) reiterate our coalition's design principles for a new public school accountability system consistent with LCFF and its principles of equity, gap-closing for high need elementary, middle and high school students, transparency, local engagement and subsidiarity, (b) comment on the gaps between our principles and the State Board's and (c) respond to the WestEd draft rubric attached to item 14 and propose improvements to the framework reflected in the item and solutions to key challenges that the item has surfaced.

I. LCFF Equity Coalition's Design Principles for Accountability & Perceived Gaps in SBE Principles

We agree that the current API is no longer aligned to California's emerging accountability system and that it is appropriate to recommend that the legislature amend the *Education Code* to replace the API.¹ That said, it continues to be important for parents, the public and state and local policymakers to be able to easily assess the quality of their local schools and LEAs. It is also important that all stakeholders understand how that assessment of quality might trigger technical assistance or interventions.

¹ We note, however, that the agenda item and the August memo appear to undersell this undertaking and the far-reaching implications on other provisions of the Education Code, including entire systems of the existing accountability system, that would flow from repealing the API. As the Board noted only a few months ago, "[b]ecause the API is deeply embedded in many sections of the California *EC* and impacts other programs, such as, open enrollment, charter revocation, and parent empowerment, the transition to a multiple measures accountability system will require subsequent changes in *EC*." SBE March 2015 Meeting Agenda, Item 6. Indeed, although the current agenda item observes that the *Williams* settlement legislation is fully aligned with the new accountability system, it glosses over the fact that schools are selected for county office of education site visits and misassignment monitoring based on their decile ranking, that is, based on the API. In sum, although the staff recommendation to repeal API makes sense in concept, there is much more thought and attention to the implications of such a change that are required before taking such action would be appropriate.

As such, it is imperative that—within the timeline being contemplated by the SBE—the SBE’s proposals for replacing the API and developing and proposing a new accountability framework (and the significant legislative changes necessary to accomplish this) address the following design principles from the LCFF Equity Coalition. Similarly, while we agree with much that is found in the SBE’s design principles, we note below where we perceive real or potential gaps.

The LCFF Equity Coalition’s design principles believe that California’s new public school accountability system should:

1. Establish Uniform and Meaningful Statewide Standards for Both “Performance” and “Expectation for Improvement”
2. Where Standards are Locally Determined, Be Research-Based, Aligned with SBE-approved Parameters, and Set Through Community Stakeholder Processes
3. Maintain an Equity Focus on Closing Achievement Gaps and Addressing Disparities
4. Prompt Reflection and Responsive Action in Ways that Link to Continuous Improvement in Actual Practices reflected in the LCAP Annual Update and Revisions
5. Support Shared-Decisionmaking of all Local Stakeholders, Including Parents and Students, through Information-Sharing, Capacity-Building and Ensuring that Opportunities for Input are Available in a Timely Manner.
6. Be Transparent with Information in a Way that is Both Comprehensive and Accessible
7. Trigger Action in a Timely Manner with Clarity of Who is Responsible for Action, Prioritizing Supports for Low-Performing Districts, Charters, and County Offices.

Coalition Comments on Aspects of the SBE’s Design Principles:

Articulate the state’s expectations for districts, charter schools and county offices of education.

(COMMENT: Good—but the expectations need to be meaningful, not simply affirming the status quo, and where locally established must be aligned to SBE parameters and subject to a local stakeholder engagement process.)

Foster equity. *(COMMENT: We strongly agree. Improved equity performance by LEAs should be a major purpose of the accountability system and will be fostered by a rubric design that honestly identifies achievement gaps and disparities.)*

Provide useful information that helps parents, districts, charter schools, county offices of education and policymakers make important decisions. *(COMMENT: Good—but parents and other stakeholders need more than just information to make important decisions; see next comment.)*

Build capacity and increase support for districts, charter schools and county offices. *(COMMENT: Good—but parents and students and teachers (not just districts, charters, and COEs) need increased capacity and supports to be enabled as true partners in LCFF’s new local decision-making processes.*

Encourage continuous improvement focused on student-level outcomes, using multiple measures for state and local priorities. *(COMMENT: It is not clear at all if technical assistance from the county offices and/or CCEE is all that is meant here or if it is also an SBE priority to ensure that the new accountability system also triggers more serious interventions for seriously low-performing LEAs.)*

Promote system-wide integration and innovation.

II. Solutions for Key Development Issues of the Evaluation Rubrics

We appreciate and acknowledge the significant amount of thought and hard work invested into this effort by staff at the SBE, CDE and WestEd and the progress made to date. We offer these recommendations in the spirit of further advancing the conversation.

A. Restructure the “SBE Policy Statements” that Will Drive the Rubrics Design

In the WestEd attachment, three key categories—Access and Opportunity, Graduation, and College and Career Readiness—are identified as “SBE Policy Statements” that will drive the overarching design of the proposed evaluation rubrics and propose a structure for organizing the 8 state priorities and the associated metrics. Those three statements are:

- All students are provided with access and opportunities that support learning;
- All students are college and career ready, exhibiting early and continuing signs of college and career readiness;
- All students graduate from high school.

We think this structuring is problematic for various reasons. Chief among them, it communicates that a key objective of our education system is simply to graduate students *no matter what* knowledge, skills or abilities they may possess. Secondly, this framing conflates the *process* of receiving an education throughout one’s years in schools that prepares one ultimately to graduate college and career ready with the actual *outcome* of graduating college and career ready.

We proposed the following revisions to this foundational set of statements:

- All students are provided with access and opportunities that support learning;
- All students are on track to graduate college and career ready, exhibiting early and continuing signs in elementary, middle and high school of college and career readiness;
- All students graduate from high school college and career ready.

This restructuring accomplishes the following:

- It avoids communicating that the purpose of our public school system is to simply graduate students, devoid of any connection to possessing a meaningful set of skills and abilities.
 - It signals instead that the standard for graduation is one by which we expect students to graduate college and career ready.
- Organizing on-track/early warning indicators together—rather than dividing them between the graduation and college and career readiness categories—places appropriate emphasis on early warning (and success) signs, particularly at elementary and middle schools, instead of focusing on after-the-fact high school graduation-related indicators (e.g., graduation rate, percentage of graduates who complete A-G requirements or CTE pathways). These latter “lagging” indicators “may be too late to assist with struggling student or schools.”²
 - As the Board materials for the May meeting provided, “The state priorities and identified metrics are overwhelming related to high school. Metrics that focus on elementary and intermediate grades are needed.” Combining on-track/early success and warning

² WestEd and SBE Staff, June 24, 2015 Memorandum, “Research to Inform the Development of Local Control Funding Formula Evaluation Rubrics.”

indicators into a broader category that includes lagging indicators like graduation is unwise because it would dilute the significance of the early indicators.

- Providing a separate category for early indicators while combining graduation and college and career readiness outcomes would avoid arbitrary distinctions between which indicators under both of our proposed categories are related to graduation and which are for college and career readiness.
- This restructuring also aligns with the Conley/Darling-Hammond recognition that accountability must address *inputs*, processes, and outputs.
 - The first policy objective and associated metrics would address key inputs like the *Williams* factors (teacher quality, instructional materials, and facilities) and course access, including at the elementary level.
 - The second policy objective and associated metrics would address the *process and progress* measures needed to assess whether LEAs are on track to eventually graduate students college and career ready. Thus, this objective would include both leading achievement indicators illuminating whether students are on track to graduate college and career ready and key process indicators that indicate whether appropriate supports are in place to produce positive outcomes (e.g., school climate and student engagement indicators such as parental perceptions of safety and receptivity, suspensions and expulsions, attendance, etc.).
 - The final policy objective and associated metrics would focus on the lagging indicators or *outcomes* (e.g., graduation rates, students completing A-G and/or CTE pathways, AP participation and passage, etc.) indicating college and career readiness.

B. Establish Meaningful Performance and Growth Standards that Drive Continuous Improvement Rather than Aspire to the Status Quo.

We have continued to remind the State Board of its statutory obligation to establish “standards for school district and individual schoolsite performance” and standards for district and schoolsite “expectation for improvement.” *Cal. Educ. Code* Sec. 52064.5(c). We are concerned that if the SBE adopts the draft proposal to establish “quality” standards by defining “quality” as simply *average* performance—that the system as a whole will simply regress to the mean. In other words, by building a system that defines as “acceptable” performance as the middle 50% of the distribution (e.g., a graduation rate as low as 83%), then LEAs will become comfortable with maintaining the current status quo, including with respect to sub-group performance.

This would be the antithesis of a continuous improvement model. Instead, consistent with this coalition’s March 6, 2015 SBE letter (and attached February 24, 2015 letter), we believe that **the SBE should establish quality standards that are aspirational yet achievable, i.e., that are above the median level of performance and which will, accordingly, spur LEAs to improve their performance.** As LEAs increasingly achieve the established performance standard—as occurred, for example, with the 800 API—the SBE should periodically recalibrate the standard.³

³ Note, this suggestion is not meant to equate the failure to obtain the aspirational standard with intervention and adverse consequences. The most serious interventions and consequences should be reserved for those LEAs that are the furthest from the quality performance standards and have the most issues of concern for multiple subgroups. The remaining LEAs who have yet to achieve a standard should be focused on what they need to do to improve to attain that level of performance.

C. *Identify Key Indicators/Metrics within Grade Spans that Prompt Further Inquiry through Linkages to Other Indicators/Metrics*

We appreciate the work that WestEd and staff have done to map the interrelationship among various metrics and to begin framing a method for presenting data. The WestEd attachment has labelled certain indicators/metrics as “key indicators;” as distinguished from related or “associated indicators,” a term used by WestEd in a recent presentation to LCFF stakeholders. In the example included in the materials (graduation and attendance as key indicators, and middle school dropout, chronic absence, and suspension and expulsion rates as associated/related indicators), only the “key indicators” are presented in the summary display, relative to the standards, suggesting that the key indicators will be the primary basis for setting standards for performance and expectations for improvement.

Conceptually, we are generally supportive of this approach and recognize the need to narrow or prioritize focus, particularly when it comes to the self-assessment process for LEAs and when identifying areas where technical assistance, support, or intervention should focus, among the many metrics that should ultimately be included in the evaluation rubrics. We believe that developing the rubrics, and the top-level display within the rubrics, to help focus attention within the LEA’s or school’s overall education program is the real value-added that the rubrics can provide, particularly as they interact with the annual LCAP and Annual Update process.

In essence, the key indicators would help flag relative strengths and whether more attention is needed in a particular aspect of the LEA’s program and, in that scenario, connect to related indicators that can help the LEA understand the “why” behind the concern or issue on the key indicator. Because data is insufficient in itself to explain the why, the rubrics would ideally include a narrative inquiry that helps guide the LEA through possible reasons—grounded in the actual practices—as to why the key indicator and one or more associated indicators are what they are.

That said, we do not necessarily agree with the preliminary identification of which indicators/metrics are “key” and which are associated/related. For example, although the item reflects the categorization of only a handful of indicators, the recent WestEd presentation labeled parent involvement as an associated indicator within the “Access and Opportunity” policy statement. The Alberta Model, however, on which the current proposal is largely based, lists parent involvement as a top-line area of focus in its summative data display, which we believe more accurately reflects the importance of this indicator. Similarly, progress toward language proficiency should be in consideration as a key indicator for English learners. There are and will be other such points of difference as to designation of key indicators. We recommend particular attention be paid to vetting the selection of key indicators with the policy stakeholders and affected constituency groups.

Moreover, for this approach to work, we believe that the key indicators must encompass the full range of the LEA’s education program, i.e., that they are developed to flag issues and identify strengths *at each relevant grade span*. Additionally, we believe, consistent with the design principle of a multiple measures system, that the rubrics must include multiple key indicators for a particular grade span and that the key indicators applicable to each grade span measure different aspects of what student success looks like. For example, our proposed category/policy statement “All students are on track to graduate college and career ready” would include additional key indicators beyond the three identified by WestEd in the presentation to LCFF stakeholders—basic attendance rates and 3rd grade reading and 8th grade math assessment scores—such as suspension rates, chronic absence rates, English Learner reclassification rates, dropout rates and/or measures for parental involvement.

In summary, we appreciate the work reflected in the item and believe the conceptual framework being proposed has the potential to make the rubrics a truly useful tool to LEAs and stakeholders to help

understand *why* the outcomes are what they are. We look forward to working with you and staff to refine the framework and the metrics and their summary in the indicators so as to best help guide self-assessment and support for all aspects of LEAs' educational programs.

D. Equity Considerations Should Be Reflected in the Summary Display at the LEA and School Level.

We believe equity is a critical component of district-level or school-level performance and should therefore be incorporated into the summary display format. Put differently, we believe that "equity" considerations must be incorporated into the high-level reflection of overall performance at the LEA and school level, not simply "outcome" and "improvement". **No LEA's overall performance should be deemed acceptable if it is masking significant inequities in subgroup outcomes or growth.**

Some members of our coalition raised this issue following the policy stakeholder input session last week in Sacramento. We understand that WestEd and staff have not completed the analysis for subgroups for the example reflected in the item and therefore could not model the numbers to incorporate them into the example. We appreciate the response and agreement that equity should be reflected in this summary display. Our coalition is working on the possible approaches for doing so and looks forward to sharing those with staff soon.

E. Where Standards are Locally Determined, They Should be Research-Based, Aligned with SBE-approved Parameters and Set Through Community Stakeholder Processes.

We believe that locally-determined metrics that measure progress on the eight state priorities and are used to satisfy the statutory requirement for district and schoolsite standards in those areas should meet a uniform standard, both in terms of the types of metrics approved and the process by which they are determined. Specifically, we propose that such metrics should be selected by LEAs from a list of metrics which the SBE has certified for use by LEAs as sufficiently research-based. LEAs, in choosing which metrics to adopt and where to set their performance and growth expectations, should be required to consult with the same set of stakeholders the LEA consults with in developing its LCAP, including Parent Advisory Committees, ELACs and DELACs. Also, LEAs should be required to track performance on their adopted metrics over time and should be required to maintain adopted metrics for a minimum of five years so as to assure that local metrics are not changed out so often as to prove unhelpful and to help build evidence and experience across the state of useful locally-determined metrics. In addition, LEAs may adopt additional metrics to measure progress in priority areas that are entirely at the discretion of the local LEA and local stakeholders.

* * *

Thank you for the opportunity to comment. We look forward to continue working with the State Board of Education to realize the full promise of LCFF.

Sincerely,

[signatories on following pages]

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