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July 7, 2023

Dr. Linda Darling-Hammond, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

RE: LCFF Equity Coalition Comments re SBE Agenda July 12-13, 2023 on:

Item 2: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Addendum to the Continuing Work and Revisions Under Consideration for the 2023 Dashboard Related to the Chronic Absenteeism Indicator.

Item 3: The California Assessment of Student Performance and Progress and the English Language Proficiency Assessments for California: Update on Program Activities.

Item 4: School Accountability Report Card: Approval of the Template for the 2021–22 School Accountability Report Card.

Item 11: Adoption of the 2023 Mathematics Framework for California Public Schools, Kindergarten Through Grade Twelve.

Item 12: California's Bipartisan Safer Communities Act Stronger Connections Grant Program Proposal: Approval of the Criteria to Define High-needs.

Dear President Darling-Hammond and State Board Members:

We represent a coalition of civil rights, advocacy, community, parent, student, educator and other organizations that have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF) and its accountability system, both at the state and local levels. As we reflect on the ten-year anniversary of LCFF, we are committed to ensuring that LCFF lives up to its equity promise to focus resources on helping California's neediest students overcome the barriers they face in graduating college and career ready and accessing a more equitable school system. Our commitment extends to LCFF's foundational principles of meaningful local community engagement informed by a new level of transparency and fiscal accountability in local schools. Please consider our comments below in your review of items 2, 3, 4, 11 and 12.

Item 2: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Addendum to the Continuing Work and Revisions Under Consideration for the 2023 Dashboard Related to the Chronic Absenteeism Indicator.

a. Adjusting Cut Scores

While Item 2 centers on the Chronic Absenteeism indicator on the California School Dashboard (Dashboard), we are concerned with language in the Summary of Issues that, “[T]he SBE ultimately did not approve adjusting cut scores for any state indicators for the 2022 Dashboard.” We remind the Board at the March 2023 meeting, Board members expressed interest in possibly revisiting the methodology for cut scores on all the 2023 Dashboard Indicators, including the English Learner Performance Indicator (ELPI) cut scores for “status.” We were encouraged with staff’s assurance in March that this issue would be addressed in a future agenda but are concerned that it appears now that it will not be until the September meeting when the Board is asked to make decisions on any cut score changes. *We reiterate our strong concern that the current “status” performance levels for English learner proficiency are inconsistent with research findings that even English learners with the lowest initial proficiency should be expected to reach reclassification within 5 to 7 years.* Revisiting the ELPI cut scores would align with the Board’s recently adopted Dashboard *Principle 11: Is subject to continuous revision and improvement*. We believe these “status” performance standards need to be addressed before the Board adopts its color rating 5x5 matrix for “change” at its September 2023 meeting.

In 2019, ELPI performance only identified 20 school districts at the “very low” level and in 2022, only 29 districts (not even one per county) were identified. These results belie the significance of the ELPI and give districts false evidence as to how well their students have progressed in learning English, if the cut scores for “status” are not elevated. Doing so would be a meaningful implementation of *Dashboard Principle 5: Values high performance and growth equally*. We urge the Board to direct this issue be addressed in next month’s information memorandum before the September meeting.

In addition, the June 19, 2023 information memo presents a score distribution suggesting that the distribution is similar for all indicators but the attached chart from the 2019 Dashboard Technical Guide shows that not to be the case. With that in mind we believe that the SBE is in a position to adjust the distribution/cut scores for ELPI. See attachment 1.

b. Chronic Absenteeism Indicator on the Dashboard

We appreciate revisiting the Chronic Absence indicator especially in light of the unforeseen impacts of the COVID-19 pandemic, increase in use of homeschooling, and environmental climate changes that have resulted in school closures. It is a demonstration of the Board’s fidelity to Dashboard *Principle 11: Is subject to continuous revision and improvement* and the need to revisit accountability decisions when results seem inconsistent with past results or evidence. In this case, an overwhelming number of districts and schools identified for additional support in an area where they usually excel, chronic absenteeism.

We appreciate the various options for possible next steps presented by the California Department of Education (CDE) and welcome the conversation. At this time, we support the Board directing CDE to pursue long-term option 2.a.: Modify the Granularity of Information Collected Around Student Absences. We agree it would be important to expand the capacity of CDE and our data

system to understand more precisely the different types of absences present (e.g., excused-sick, excused-vacation, excused-climate-related, etc.) and to see how those absences may vary across schools and districts. We stand ready to work with the Administration, the Legislature and CDE to effectuate the expansion of CDE's data capacity and that of the data system as a whole.

As to the short-term modification options (1a. through 1c), we believe it is too early to implement changes for the 2023 Dashboard. Absences, for whatever reason, constitute missed days of learning and lost educational opportunities. It is important to continue to track the extent of the loss of school days by district and statewide as we continue to emerge from the pandemic. Also, while climate change and the attendant absences caused thereby are likely only to get worse in the foreseeable future, we are hopeful that the many pandemic-related absences will decrease in the near term. Accordingly, at this still early stage, we feel it would be premature to alter the essential infrastructure of the chronic absenteeism indicator until there is a little more passage of time and more information on school attendance. In that way, we can better assess if this year's significant spike in chronic absenteeism is an anomaly or the "new normal."

c. Add the Chronic Absenteeism Indicator for High Schools

We also reiterate our recommendation that the Chronic Absenteeism indicator for high schools be incorporated into the Dashboard to encourage districts to focus on this issue, especially in the use of its resources in its LCAPs. For our alternative education schools (DASS schools), there are challenges with many of the other Dashboard indicators because most students at these schools arrive at the school in their junior or senior year and stay for short periods of time. Chronic absence rates may be the best indicator of school quality for these schools. As part of a multiple measures accountability system, we believe the Dashboard should take advantage of quality data on school outcomes when possible. The state has multiple years of quality data that are relevant to Priority 5 – Student Engagement – for chronic absence rates for high schools. Currently only graduation rates are used for accountability purposes to measure student engagement for high schools. Last year, 42% of Black students in high schools were chronically absent, almost double the pre-pandemic levels. At alternative education schools (DASS schools), even pre-pandemic chronic absence rates exceeded 50% on average statewide. For high schools, addressing chronic absenteeism is a critical step to moving graduation rates and is a leading indicator instead of a lagging one like graduation rates. Therefore, we recommend the Board take steps toward adding HS chronic absence rates to the Dashboard.

Item 3: The California Assessment of Student Performance and Progress and the English Language Proficiency Assessments for California (ELPAC): Update on Program Activities.

We appreciate the Department's work of developing interim assessments for science and the ELPAC. *We note that interim assessments and tools for teachers were developed for English language arts, math and science, but not English language development and believe this omission should be corrected.*

Our community partners are currently reviewing the sample student reports. We would like to see the reports translated into *all* families' home languages, not just the required languages. One

comment we received is that symbols representing Above Standard (star), Near Standard (+/-) and Below Standard (!) are confusing and do not adequately represent their intended meaning. A simpler symbol such as thumbs up or thumbs down might be more meaningful.

Item 4: School Accountability Report Card: Approval of the Template for the 2021–22 School Accountability Report Card (SARC).

We support CDE's recommendation to approve the SARC template for the 2022-23 school year. We want to thank CDE for its previous revisions to tables 6-10 on teacher data in response to prior recommendations. The data on teacher preparation continues to be user-friendly to a wide audience, which is especially significant for students, parents, and community members who are directly impacted by teacher preparedness and can mobilize their communities when more support is needed at schools and/or districts. The year-to-year comparisons are helpful to assess how schools are progressing during this uniquely difficult time of teacher shortage. We appreciate that CDE has included two years of teacher data. We look forward to the return of the three most recent years of data with three years of TAMO data on next year's SARC template.

Item 11: Adoption of the 2023 Mathematics Framework for California Public Schools, Kindergarten Through Grade Twelve.

We thank the Board and Department for listening to the substantial public comments and input in developing the 2023 Mathematics Framework. We are pleased to see that the focus on equity in pedagogical approaches to teaching math remains from the previous version and support CDE's recommendation for approval. *However, we request that language in Chapter 13 around Category 1 for instructional materials' alignment with standards be modified to ensure that instructional materials are aligned to the Mathematics Standards and the English language development (ELD) standards in the same way ELD alignment is expected in the English language arts framework.*

Item 12: California's Bipartisan Safer Communities Act Stronger Connections Grant Program Proposal: Approval of the Criteria to Define High-needs.

We applaud the effort to define high-needs criteria for eligibility in the Bipartisan Safer Communities Act Stronger Connections Grants and for including “a school stability rate lower than the state average” as a measure, but would ask that a mobility measure be established to illuminate disparities among subgroups. While this appears to be a one-time opportunity, *we recommend that a definition be adopted that is consistent with existing identifications for greater support: Comprehensive Support and Improvement (CSI), Equity Multiplier and Community Schools.* The grants were provided in these programs based on the state’s determination of high need and it makes sense to focus new resources on ongoing support efforts.

* * *

Thank you for the opportunity to comment. We look forward to continuing our collaboration with the State Board of Education to realize the full promise of LCFF for our neediest students.

Sincerely,

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Attachment 1. Percentile Rank of the “Status” cut scores based on the statewide LEA-level distribution for each Dashboard Indicator, CDE 2019 California School Dashboard Technical Guide.

CC:

Brooks Allen, Executive Director, State Board of Education (SBE)

Jessica Holmes, Chief Deputy Executive Director, SBE

Sara Pietrowski, Policy Director, SBE

Tony Thurmond, State Superintendent of Public Instruction, CA Dept. of Education (CDE)

Cindy Kazanis, Measurement & Accountability Reporting Division, CDE

LCFF Equity Coalition

July 7, 2023 Comments to SBE

Attachment 1.

Percentile Rank of the “Status” cut scores based on the statewide LEA-level distribution for each Dashboard Indicator

Performance Rating Cut Scores	ELPI	ELA 3-8	ELA HS	Math 3-8	Math HS	CCI	Graduation Rate	Chronic Absence	Suspension (Unified Dist)	Suspension (Elem Dist)	Suspension (HS Dist)
High/Very High Med/High (State Performance Goal) Low/Medium Very Low/Low	93.5	90.5	88.9	91.9	93.6	91.4	65	90	92.8	80	93.9
	74.5	71.7	63.7	78	86.8	75.5	31	75	73.1	61	80
	32.7	61.1	40.5	60.6	58.2	40	11.5	40.6	42	36.1	44
	9.1	5.8	14.1	5	23.8	14.8	5.4	11.1	10.4	11.2	16

Source: CDE 2019 California School Dashboard Technical Guide