



July 7, 2023

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

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

RE: Item 2 – Integrated State and Federal Accountability System

Dear President Darling-Hammond and State Board Members:

The Alliance for Student Success consists of organizations that advocate on behalf of students, parents, community members, and educators in our state's public schools. We are united by a common belief that all schools and districts must address long-standing inequities of opportunity and should offer every student an excellent education that prepares them for college, career, and civic life. We offer comments on Item 2 with the aim of informing the Board's continuous improvement process for the integrated local, state, and federal accountability system.

Potential Changes to the Chronic Absence Indicator – Stay the Course and Add Chronic Absence for High School Students

While we appreciate the Board reviewing the Chronic Absence Data, the Alliance for Student Success believes the Board should maintain chronic absenteeism as a Dashboard indicator and maintain the current calculation methodology. Attendance is a leading indicator of future academic performance and eventual graduation. By focusing on students who are at risk of becoming chronically absent, districts can head off potential academic and socio-emotional issues before they become detrimental to a student's future academic success.

While any absence, whether excused or unexcused, has a negative impact on a student's academic learning, the recently released PACE (Policy Analysis for California Education) report provides some new insights into the impact district attendance policies (over which LEAs have broad discretion) can have on individual students and merits a closer look. The report highlights that specific racial/ethnic groups have much higher proportions of students with unexcused absences. Research shows unexcused absences can have negative consequences on students' grades and result in the potential loss of credits which ultimately reduces the probability of students graduating on time.

"Two students are sick. Both miss five days of school. One student has a family physician, and their parents are familiar with school policies. This student returns to school with a doctor's note, and their five absences are excused. The other student's family cannot afford to see a doctor. This second student returns to school without a doctor's note, and their five absences are unexcused. The family receives a letter stating that their child is truant and they may be taken to court if the absenteeism continues." (PACE Report)

In this scenario, a family's access to health care makes the difference on whether or not an absence is excused and if the student can make up work or receive credits for the time absent. We would encourage the Board to explore **Option 2a: Modify the Granularity of Information Collected Around Student Absences** to look at additional reporting details on unexcused absences.

Further, we recommend the Board seek options from the California Department of Education (CDE) and Board staff on how they might **add high school chronic absence as a state indicator on the Dashboard**. The main barrier to adding high school chronic absence as an indicator on the Dashboard is how to treat an additional indicator from the perspective of federal law, which places restrictions on the balance between academic and non-academic indicators. Adding state indicators to the Dashboard is an issue the Board will need to address if it wants to consider adding indicators on teacher assignment, science assessment results, growth model, school climate, or other areas. Consequently, we recommend the Board request an information memo on options on how the SBE may add state indicators to the Dashboard while remaining in compliance with federal law.

Last year, 42% of Black students in high schools were chronically absent, almost double the pre-pandemic levels. For alternative education schools (Dashboard Alternative School Status schools), even pre-pandemic chronic absence rates exceeded 50% on average statewide. For high schools, addressing chronic absenteeism is a critical step to improving graduation rates and is a leading indicator rather than a lagging one like graduation rates. Therefore, we recommend the Board take steps toward adding high school chronic absence rates to the Dashboard.

Board Should Review Performance Standards for the ELPI (English Learner Progress Indicator) As Part of Adopting the Color Matrix for the Indicator in September

Item 2 describes the setting of performance standards for indicators as part of the integrated state and federal accountability system, and the decision to stay the course on previously set performance standards. We encourage the Board to reconsider this approach for the English Learner Progress Indicator (ELPI) for the following reasons – (1) the Board has varied its approach to standard setting significantly across Dashboard indicators, (2) the current standards allow too many English learners (ELs) to end up becoming long-term English learners (LTEs) even in “high” performing districts, and (3) the inflated performance ratings influence the level of investments (in Local Control Accountability Plans) in EL services and number of districts receiving supports for their EL programs.

Board Standard Setting Process has Wide Variation Across Indicators. The Board must identify four cut points to establish the five performance levels for a Dashboard indicator. A recent Board memo suggested there is a standardized approach across indicators in setting those standards based on the distribution of the prior performance of districts on a specific indicator. The data shows significant variation across indicators. Figure 1 shows the percentile rank of the local education agency (LEA) distribution where the Board has set the cut score for various indicators based on CDE's 2019 technical memo on the indicators (we use 2019 data to not confuse the standard setting process with the recent impact of the pandemic). The cut point between very low and low performance ratings is an important one because it impacts which districts and subgroups receive additional assistance through the System of Support. Those cut scores range widely across the percentile distribution of the indicators. For example, for grade 3-8 math, the low/very low cut score is at the 5th percentile. For high school math, the cut score is at the 23.8th percentile. So, while for one group only 5 percent are considered very low

performing, for others 23.8% are considered very low performing. Similarly, for setting the “state performance goal” standard for an indicator (the cut point between medium performance and high performance), the percentile ranking varies from the 31st percentile to the 86.8th percentile. Attachment 1 shows the cut score percentiles for each Dashboard indicator. This wide range of performance thresholds suggests the Board considered additional factors beyond the distribution in the standard setting process. Those additional factors have varied by Dashboard indicator. For example, the standards for graduation rates reflect past statewide goals.

Figure 1. Board Has Used Broad Discretion Beyond Distributional Factors in Setting Performance Cut Scores
(Percentile Ranks of the Cut Scores for Dashboard Indicators)

	MINIMUM PERCENTILE RANK	ELPI	MAXIMUM PERCENTILE RANK
HIGH/VERY HIGH	65	93.5	93.9
MED/HIGH (STATE PERFORMANCE GOAL)	31	74.5	86.8
LOW/MEDIUM	11.5	32.7	61.1
VERY LOW/LOW	5	9.1	23.8

Current ELPI Standards are Too Low and Do Not Align with Research-Based Expectations

We believe the Board should align the ELPI standards and State Performance Goal with research expectations around how quickly an EL should reach reclassification. If the ELPI standards are too low, then districts could end up with sizable portions of their students being designated as LTELs when the ELPI suggests their EL supports are helping students in meeting state standards. This is what the data shows. By way of example, there is a school district in Sonoma County with a rating of “high” on the ELPI performance indicator, yet 85% of the districts’ 6th graders are designated LTELs. By combining data on LTELs and ELPI data, we found that 18% of school districts rated either “high” or “very high” on their ELPI performance have over half of their 6th grade students designated as LTELs. In our view, districts have let down any student that is designated as LTEL.

The slow progress of ELs on the path to reclassification suggests the problem of EL progress is chronic across the state. The first summative data that we have on English learners comes at the end of the kindergarten year. Currently, just 18.5% of kindergarten students with an EL classification score within the level 1 range on the English Language Proficiency Assessments for California (ELPAC) at the end of kindergarten. Research suggests as a best practice that these students should make annual progress on their proficiency progress annually and at a rate such that they achieve reclassification within five to seven years. For the remaining 81.5% of ELs in kindergarten, the expectation for reclassification should be less than five to seven years as they are starting at a higher level of proficiency. Yet, statewide, almost half of ELs starting school in kindergarten become LTELs in sixth grade. (There are almost 72,000 new 6th grade LTELs per year.) This aggregate data suggests almost no ELs starting at either Level 1 or Level 2 on the ELPAC reach reclassification by 6th grade.

Consequences of the Low ELPI Performance Standards - Few Districts Focus on ELs in their LCAPS and Few Districts Identified for Support Based on EL Performance

The reason the ELPI performance standards matter so much is that they are a signal to districts on where to focus their efforts in their Local Control Accountability Plans (LCAPs) and which districts receive support to help strengthen their EL programs. The theory of action underpinning the Local Control Funding Formula (LCFF) is that districts should use their Dashboard data to determine where they should focus their attention. Even though LEAs are receiving \$13 billion annually in LCFF Supplemental and Concentration (S&C) grants, based on their number and percentage of ELs, low income and foster youth students, few districts are investing their LCFF S&C funds on English learner programs. A study of districts with substantial number of ELs conducted by Californians Together found that only 15% of the LCAPs reviewed in their study had set a goal (and related actions) for English Learners or English Language Development. Additionally, CDE data shows that only 41 districts were identified for Differentiated Assistance (DA) in the System of Support prior to the pandemic (2019), and the number in DA has only grown slightly to 46 districts under the temporary criteria used for 2022. We believe that the low expectations of the ELPI standards are the main cause of this lack of focus on ELs in terms of goal setting, use of LCFF S&C funds and external support.

For these reasons, we believe the Board should review its performance standards as part of establishing its color ratings for the ELPI this fall. In reviewing those performance standards, we encourage the Board to align its standards with the research expectations for a student to make sufficient annual progress to be reclassified with five to seven years when starting at the lowest initial performance level.

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.

Sincerely,

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Sara Pietrowski, Policy Director, SBE
Tony Thurmond, State Superintendent of Public Instruction, CA Dept. of Education (CDE)
Cindy Kazanis, Measurement & Accountability Reporting Division, CDE

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	93.5	90.5	88.9	91.9	93.6	91.4	65	90	92.8	80	93.9
Med/High (State Performance Goal)	74.5	71.7	63.7	78	86.8	75.5	31	75	73.1	61	80
Low/Medium	32.7	61.1	40.5	60.6	58.2	40	11.5	40.6	42	36.1	44
Very Low/Low	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