

July 3, 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 July 2015 Agenda Item #1 – Evaluation Rubrics & Accountability System Update

Dear President Kirst:

We represent a coalition of civil rights, advocacy, community, parent, student, educator, 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 implementation of LCFF.

We appreciate the efforts that Board staff and WestEd have made to advance the substantive discussion around the LCFF evaluation rubrics and, more recently, how they interact with the broader state accountability system. We also appreciated the discussion at the most recent State Board meeting, which reflected the most significant substantive discussion we have heard to date about these issues that are critical to whether LCFF's equity promise is realized. Finally, we understand—and some of members of our coalition actively supported—the recent statutory change that provides the State Board with an additional year to adopt LCFF evaluation rubrics and appreciate the attempt in the agenda item to provide some clarity around how the State Board, Board staff, and WestEd will use the additional time.

As you may recall, our coalition has consistently endorsed, since January 2015, design principles that we believe should animate the development of the evaluation rubrics, including:

- Establish Uniform Statewide Standards for Both “Performance” and “Expectation for Improvement”
- Maintain an Equity Focus on Closing Achievement Gaps
- Be Supportive of Student, Parent, and Stakeholder Engagement; Comprehensive, Yet Accessible; and Transparent
- Trigger Action in a Timely Manner with Clarity of Who is Responsible for Action
- Be Inquiry-Prompting in Support of Continuous Improvement

More detail on each principle is included in our past letters.

With the context of the past six months' work by the Board, Board staff, and all stakeholders and our prior input on the direction of the LCFF evaluation rubrics and broader accountability discussion in mind, we write to share several observations, concerns, and recommended next steps based on our review of the agenda item and its various attachments.

1. Desire to see more details about opportunities for stakeholder input throughout the remaining development of the rubrics and the broader accountability system.

We were surprised and disappointed that the item provides little-to-no details on how the State board intends to solicit and incorporate input from parents, students, advocacy and other key stakeholder groups at the key decisions points over the additional year that the State Board now has to develop the evaluation rubrics. Given past efforts to broadly solicit input, we expect and hope that staff will be provide more details on this important issue as part of the presentation at the upcoming board meeting. If not, however, we request that the Board direct staff to develop and communicate details about when and how such stakeholders can engage in the proposed process constructively.

Specifically, neither section of Attachment 4 about Communication and Outreach plan nor the table reflecting the revised proposed timeline explicitly address how the Board anticipates soliciting and processing feedback and input at the key decision points reflected in the proposed timeline from the broad set of stakeholders that have expressed interest in this critical issue to date.

For example, the communication plan identified multiple avenues and mechanisms through which the Board and WestEd will share information with the public and stakeholders. But, aside from noting that there will be “public comment opportunities” at SBE meetings, there is no vision for how and when all interested stakeholders will be able provide input at key junctures to enable Board members, Board staff, and WestEd to give that input meaningful consideration. Similarly, although the proposed timeline references explicitly several points and processes through which LEAs will provide feedback, the timeline is nearly silent on opportunities for other stakeholders. The one reference to other stakeholders, however, suggests that this input will be valued less: the timeline entry for May 2016 notes that the evaluation rubrics will be finalized based on guidance from the State Board, “feedback from LEAs, COEs, and as appropriate input from stakeholders.”

LEA and COE feedback is, of course, important. But in keeping with the “guiding principles” of the accountability system, we also need to ensure that feedback on the initial concept, design features, and initial drafts includes strong representation from parents, students, and community groups with expertise on engaging parents and students; equity advocates; and groups representing student subgroups.

In closing, we appreciate the past efforts by the Board and staff to solicit input and convey how that input was considered in reaching a final decision. This made the absence of details about when and how members of our coalition can engage constructively over the next year particularly striking and surprising. More generally, it is unclear from the item when the Board will make decisions about each of the key issues identified, which again makes it nearly impossible to tell when and how stakeholders can engage constructively and on a timely basis. We look forward to learning more details about when and how we can provide input to inform each key stage of the process over the next year.

2. Request for clarity about how the parent and student stakeholder input on parent involvement, student engagement, and school climate that has recently been conveyed to WestEd and the SBE from regional and state convenings will be reflected in the Board’s process.

Over the past month, parent, student, and community groups have partnered with WestEd, as well as CDE and SBE staff to hold two important stakeholder input sessions: An outreach session on May 30 with 100 parents, students, and community members in four locations around the state to get input on both the design and content of the rubric; and an outreach session involving 19 parent/caregiver organizations from around the state focused specifically on the parent involvement priority area. These

efforts have generated important feedback on the metrics and engaged a broad cross-section of parents in the rubric and broader accountability system.

This engagement is critical to the local accountability envisioned as central to success of the Local Control Funding Formula. We therefore think it is important that the State Board share how it plans to integrate the recommendations of these groups into the rubric and accountability conversation.

We also join with parent groups around the state in supporting the recommendation, coming out of the June 10 stakeholder session, that a parent/caregiver working group be established to provide ongoing feedback and ensure consistent stakeholder input around the development of the metrics and ongoing accountability discussion related to the parent involvement priority area.

3. Lack of clarity about how the proposed alternative approach to the rubric design will accommodate the LCFF statute’s requirement that SBE adopt statewide standards for performance and growth for each of the 8 state priority areas as part of the rubrics and for intervention protocols.

The clustering of indicators makes intuitive sense and could lend itself to an accountability framework that is accessible to the public and clearly articulates the state’s expectations for college and career readiness. We are, however, somewhat confused about how the approach laid out in the agenda item will be reconciled with the statutory requirement to establish performance standards and expectations for improvement within each state priority area. As noted above, we believe this statutory requirement is essential to ensuring that the rubrics are useful tools for continuous improvement and for informing when LCFF’s accountability provisions—county office technical assistance and the more intensive state intervention authorized under Education Code 52071 and 52072—should come into play.

On the one hand, we were pleased to see the final paragraph of Attachment 1 and the timeline (for September 2015) reference this critical issue. On the other hand, we struggled to see clearly how the new framework for the rubrics proposed in Attachment 1 (which proposed clustering indicators around certain outcomes) and policy frame (which focus on certain outcome statements) will be reconciled with the underlying statutory requirements for standard-setting and for assistance and intervention. This discussion was largely silent on certain state priority areas that many of our coalition’s member believe are critical, such as parent involvement and school climate.

The item describes the framework and policy frame as examples, and we hope that the use of those examples is just that, examples to illustrate the concept. But we are concerned that the item is not clear, and also does not identify an overarching framework for incorporating indicators relevant to all eight state priority areas, notwithstanding the affirmation of the statutory requirement to set standards relevant to all eight priority areas. Accordingly, we look forward to hearing more details on this point and hope to see greater clarity on these issues in the very near future.

4. Request for greater clarity on when and how the SBE will be defining the permissible parameters for local districts when they develop “locally determined metrics” for the evaluation rubrics.

Attachment 2 of the agenda item, discussing the proposed LCFF evaluation rubric design principles continues to suggest that at least some metrics incorporated into the evaluation rubrics may be “locally determined.” Based on our review of the proposed timeline and the balance of the item, it was not clear when the Board would determine whether, in what circumstances, and within what parameters LEAs would determine a local metric.

We recommend clarifying how this important question fits into the proposed timeline and, based on our initial review of the timeline, recommend that it be included among the issues analyzed from July 2015 through September 2015 and be expressly listed as a topic for discussion at the September 2015 meeting.

5. Recommendation to explicitly incorporate equity analysis in each of the topics identified as benefiting from further research.

In reference to “Research to Inform Evaluation Rubrics Designs” included in Attachment 1 page 2 of 3, we are encouraged by the willingness to look at further research to identify “future items and/or memoranda to the SBE.” We recommend, however, that the proposed questions be modified to ensure that the results of this research analyzes outcomes for all the relevant student subgroups. Consistent with the LCFF design principle of promoting equity, we offer for your consideration examples of edits that could be made to the proposed research questions to make equity considerations more prominent (see italicized wording).

- Are there demonstrated relationships between participation in career pathway programs and high school graduation *disaggregated by subgroups*?
- What is the correlation or relationship among state priority metrics and specific college and career readiness metrics (e.g., graduation rate, California High School Exit Examination passage, A-G completion, and Advanced Placement passage, *school stability (Priority 10), eligibility for the State Seal of Biliteracy*) for students from low-income families, English learners, and foster youth?
- What, if any, early indicators can be validated as indicators of secondary outcomes? [For example, research has shown that reading by grade three *in English or the student’s primary language*, meeting grade level expectations in mathematics at grade eight, and chronic absenteeism are potential early indicators of on time graduation *which should be reported and disaggregated by student subgroups*].
- Is there a correlation between students that repeat courses in a mathematics or ELA sequence in intermediate and/or middle grade levels, *replication of the 9th grade because of missing credits* and their graduation rates *disaggregated by student subgroups*?

In addition to our recommendations for possible enhancement of the four identified research questions to include an explicit focus on equity considerations, we believe that additional questions should be included among the research topics, and offer the following as a few examples:

- Is there a relationship between level of bilingualism and high school completion and college going rate? (see research “Bilinguals in the US and College Enrollment,” Santibanez and Zarets, *The Bilingual Advantage: Language Literacy and the US Labor Market*, Multilingual Matters Press, 2014)
- Is there a relationship between level of English proficiency, primary language literacy and grade 3 level of reading?
- Is there a relationship between high school completion and students who receive the State Seal of Biliteracy?
- Is there a relationship between rate of transfers at the elementary, middle, and high school levels and the high school completion and college going rate?
- Is there a relationship between being overage and under-credit at each of the high school grades and the high school completion and college going rate?

We also want to call to your attention the publication, “Seizing the Opportunity to Narrow the Achievement Gap for English Learners: Research-based Recommendations for the Use of LCFF Funds.” Authored by Drs. Patricia Gandara and Maria Estela Zarate for the UCLA Civil Rights Project, the report’s recommendations are organized by the state’s 8 LCFF priorities and are culled from the research

on English Learners. They should be a resource for further questions and provide support for the additional ones contained in this letter.

In addition, we call your attention to the publications that highlight the foster youth educational experience in California, including “Foster Youth and Early Implementation of the Local Control Funding Formula: Not Yet Making the grade” by Daniel C. Humphrey and Julia E. Koppich; “The Invisible Achievement Gap, Part One: Education Outcomes of Students in Foster Care in California’s Public Schools” by Vanessa X. Barrat and BethAnn Berliner; and “The Invisible Achievement Gap, Part Two: How the Foster Care Experiences of California’s Public School Students are Associated with their Education Outcomes” by Wendy Wiegmann, Emily Putnam-Hornstein, Vanessa X. Barrat, Joseph Magruder, and Barbara Needell. These publications offer useful research and highlight critical indicators, which can make the evaluation rubrics meaningful for districts as they meet the unique educational needs of their foster youth populations.

Lastly, if the State Board continues to ask WestEd to convene research assessment and policy specialists, we would like to submit names of experts from both arenas to participate in these conversations and consultations.

6. Recommendation to give central prominence to Equity, i.e., closing achievement gaps within districts, in the rubrics.

We appreciate and strongly support the inclusion of Equity in the proposed design principles for the LCFF evaluation rubrics (Attachment 2). We agree that promoting success for all students, including students from high-need or traditional disadvantaged backgrounds is critical to ensuring that the evaluation rubrics are tools that support the ability of LEAs and the state to achieve LCFF’s equity promise. Accordingly, we agree that continuing “to disaggregate data by student subgroup for both reporting and accountability purposes” is an essential feature for advancing the Equity principle.

As noted above, however, the proposed research questions could more directly advance this design principle. Similarly, the proposed timeline provides little detail about how equity considerations will maintain appropriate prominence at each of the key decision points for the LCFF evaluation rubrics and the broader accountability discussion. We hope to hear more details on this front during the presentation and discussion of this item at the upcoming Board meeting. Additionally, we encourage the Board to give central prominence to the importance of closing achievement gaps at each stage of the upcoming process.

7. Need for a clear explanation of how the state will gather, maintain, and make available to the public the district and school-level data discussed in the current rubrics framework attachment.

We were pleased to see the continued emphasis on gathering data on multiple indicators and making that information accessible and actionable to users. We believe that this is essential to ensuring the evaluation rubrics are useful and achieve many of the Board’s articulated design principles.

We noted, however, that there was no discussion about capacity or the underlying architecture for collecting and processing the data in formats that are helpful to all relevant users. In light of the apparent challenge that WestEd had in obtaining data about the statutory metrics to conduct a meaningful analysis to inform the Board’s deliberations in May, we think this is an issue that merits more explicit consideration.

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We appreciate the opportunity to comment. We hope to hear more details about the issues highlighted above at the upcoming Board meeting and look forward to continue working with the State Board, WestEd, and other stakeholders to realize the full promise of LCFF.

Sincerely,

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