



November 3, 2017

President Michael Kirst and Board Members
California State Board of Education
1430 N Street, Room #5111
Sacramento, CA 95814

**Agenda Item #3: Developing an Integrated Local, State and Federal Accountability System -
Approval of the Recommended Revisions to the Academic Indicator**

Dear President Kirst and Board Members:

I write in response to agenda item 3, which recommends new color designations for the five-by-five Academic Indicator grid as a direct response to the latest release of Smarter Balanced test scores. We oppose the policy of responding to disappointing test results and huge achievement gaps by lowering the bar. This is a dangerous precedent and undermines any confidence the public may have in the LCAP scheme to help improve schools, improve equity of opportunity and educational outcomes. EdVoice urges the Board to reject the recommendation to shift the colors and lower academic expectations of schools and districts in the state's accountability system.

Changing the colors (of an already complicated indicator) raises three major concerns. The first concern is that of precedent: If Smarter Balanced test scores in the future are similarly stagnant, is California simply going to alter the grid colors to better accommodate those scores? This would be a dangerous precedent to set – and one that defies basic tenets of educational measurement and accountability. The item expresses a commitment to “continuous improvement” – but if the colors are repeatedly altered, any authentic “improvement” would be obscured.

The second concern is the message this change would send to students, families and educators. By changing the grid color designations, the implication is clear: We didn't like the test scores, so we'll lower the standards to ensure more LEAs and schools are classified as “green” and less are “red.” For example, under the current five-by-five grid, based on 2017 Smarter Balanced ELA scores, 169 (10.4%) of LEAs are classified as red and 248 (15.3%) as green. Under the newly-proposed grid, just 64 (4.0%) of LEAs would be classified as red and 391 (24.1%) as green. Additionally, under the newly-proposed grid, a school can decline by more than 15 points (over half a grade level) and still be labeled “green.” A decline of over half a grade in achievement should not be awarded the second highest color rating. While the language put forth is “changing the colors,” the underlying message is obvious: The bar has simply been lowered.

Any discussion of specific subgroups of students, additionally, was wholly omitted from this portion of the item (nearly 30 pages long), which is our third concern. The mysterious Technical Design Group, in proposing new color designations for the grid, failed to mention potential effects this change could have on subgroups of students and achievement gaps. The role of equity in this

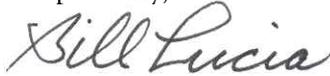
Academic Indicator recommendation reveals the state's disregard for equity of opportunity; at best it is some kind of afterthought.

Indeed, on the heels of 3 years of disappointing data and delays in the public release of statewide test data, this proposal brands "continuous improvement" as state-sanctioned tolerance for failure of achievement and failure of equity of opportunity—forever.

We urge the Board to reject the Superintendent and Department's recommendations. A lowered bar in response to stagnant and abysmal Smarter Balanced scores, particularly for low-income and minority students is no way to design a system that supports genuine progress in achieving positive academic outcomes for all California's students. No accountability research supports a theory of action to propose that students and school systems rise to lowered or ambiguous expectations.

If you any questions, please don't hesitate to contact me directly.

Respectfully,

A handwritten signature in cursive script that reads "Bill Lucia".

Bill Lucia
President & CEO

cc: Karen Stapf Walters, Executive Director, California State Board of Education
Judy Cias, Chief Counsel, California State Board of Education