



January 12, 2018

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

Agenda Item #5: California State Plan for the Every Student Succeeds Act (ESSA)

Dear President Kirst and Board Members:

We write to comment on California's ESSA plan and proposed meaningless responses. The U.S. Department of Education (ED) sent feedback describing California's failure to comply with the law, signed by President Barack Obama in 2015. The analysis by ED reiterated multiple concerns that EdVoice has previously identified. However, to date, the response by the California Department of Education (CDE) has not produced any meaningful changes. As such, our concerns with California's plan remain exactly the same. Specifically:

- ***California is failing high school students.*** "CDE did not provide in its State plan academic achievement long-term goals that include high school." This is an explicit requirement of ESSA. Rather than proposing to follow the law and include a stand-alone measure for high school academic achievement (for example, the 11th grade Smarter Balanced test), the CDE has not attempted to correct this flaw.
- ***California is failing English learners and low-income students.*** California's plan "did not provide" measurements of interim progress toward academic long-term goals for all students and student subgroups, a requirement of ESSA so states better identify and address achievement gaps. The plan instead creates over 1,000 different targets by allowing districts to determine, on their own, measurements necessary to meet the statewide long-term goal. This relies on tepid goals that will never put all schools on track to reach "Green" or close achievement gaps, and certainly not in seven years.
- ***California is failing to ensure every child has a great teacher.*** California's plan does not explain the extent to which low-income and minority children are served at a disproportionate rate by "ineffective, unqualified, and out-of-field teachers," as required by ESSA. The State's response: It will figure out how to do that by Spring 2019. That's nearly 4 years after President Obama signed the law.

The failure of the California Department of Education to address substantive, meaningful feedback is not only a missed opportunity to address persistent achievement gaps, it's a dereliction of the duty laid out in the California Constitution and President Obama's Every Student Succeeds Act to ensure every child has an equitable opportunity to learn. EdVoice urges the Board to reject the hollow "revisions" to the plan recommended by the Superintendent and take action to ensure California's ESSA plan responds to the letter of the law signed by President Obama in a way that makes authentic use of extra federal resources to help ensure English learners, migrant students, and low-income students have an equitable opportunity to learn in every California public school.

If you have 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