



May 1, 2020

Dr. Linda Darling-Hammond, President
State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814
Via email only (sbe@cde.ca.gov)

RE: Item 2: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System

Dear President Darling-Hammond:

We represent 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 write to request that you reject the proposed 5x5 grid stabilization methodology in Item 2 because it would ignore and therefore reinforce known structural inequities, lacks continuity, and would act to reduce investments that provide critical assistance for continuous improvement in schools that have been rated red and orange for years.

The proposed matrix artificially elevates outcomes and disqualifies districts and schools recently (pre-COVID-19) identified as eligible for technical assistance to improve equity of opportunity for tens of thousands of students. Instead, we recommend that the Board direct the Department to provide other options for the Board to consider moving forward in a post-COVID-19 world that do not lower expectations for LEA performance and weaken the likelihood

of students benefiting from the System of Support in districts and schools that need extra help, particularly among disadvantaged subgroups.

With more than a year to consider more equitable courses of action for the 2021 Dashboard, there is no reason to rush this decision. California should take the time to get a full sense of the “new normal” and challenges to learning before making any changes to ensure a consistent and fair accountability tool.

While the proposed methodology purports to be a minor, technical adjustment to the school performance rating system, it actually represents a drastic detrimental change. Specifically, if approved, this methodology will lower the number of schools with red and orange ratings substantially and increase the number of schools with yellow and green ratings when using the same student outcomes data (see below for the impact that the new methodology would have on suspension rates). A similar pattern of color changes would happen for the other indicators as well.

In practice, that means that many LEAs would fail to qualify for Differentiated Assistance (assuming the 2019 student outcomes remain constant). This proposed change produces harmful, and clearly unintended adverse consequences for the entire System of Support.

Proposed Methodology’s Impact on Color Ratings for Suspension Rates:

Color Rating	Current Methodology	Proposed Methodology	Change	% Change
Red	733	546	-187	-26%
Orange	2102	1109	-993	-47%
Yellow	1508	2279	771	51%
Green	2300	2710	410	18%
Blue	2851	2851	0	0%

Further, the item provides no analysis of the proposal’s effect on subgroup performance indicators. This is particularly alarming in the current circumstance when we expect drastic setbacks in learning and widening achievement gaps for students who did not receive equitable learning opportunities during COVID-19 school closures. Subgroup analysis must be part of the public deliberation for any changes to the methodology.

We recognize that stability may be an issue for a select number of indicators. However, given the most recent federal waiver of assessments, there is more time to consider alternative courses of action that do not undermine support for California’s neediest schools and students. It is important to emphasize that color ratings are designed to identify schools in the *system of support* -- not punishment -- and that changing mindsets about the purpose of this accountability tool matters more than ever. Parents, educators, and students need

decisionmakers to step up and support interventions and speedy timelines to close achievement gaps, not create new and disjointed school performance parameters that further obscure schools' issues related to equity of opportunity, college readiness, chronic absenteeism, graduation rates, and suspension rates.

Finally -- notwithstanding the assessment waivers -- transparency and accountability for all student outcomes, including academic learning, remains critical. Accordingly, we support the Board's continued commitment to pushing toward the implementation of a growth model. Now more than ever, we need to understand the trajectory of learning at each district and school (including each subgroup) to ensure equity of opportunity. We recommend the Board continue to place a high priority on moving forward with the growth model planning for implementation as soon as it is feasible. We also support the publishing of historical growth data in an expeditious manner so that stakeholders can better understand school performance pre-COVID-19 and compare it with student growth post-COVID-19 to support learning recovery efforts in the future.

Thank you for your consideration.

Respectfully,

Vanessa Aramayo
Executive Director
Alliance for a Better Community

Seth Litt
Executive Director
Parent Revolution

Katie Braude
Founder & Executive Director
Speak UP

Bill Lucia
President
EdVoice

Kirk Clark
Executive Vice President
California Business Roundtable

Rob Manwaring
Senior Policy & Fiscal Advisor
Children Now

Drew Furedi
Executive Director
Para Los Niños

Desiree Martinez
Manager of Organizing, Los Angeles
Our Turn

Jonathan Klein
Executive Director
GO Public Schools

Ana Ponce
Executive Director
Great Public Schools Now

Sarah Lillis
Executive Director
Teach Plus – California