



July 2, 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: General Comments - 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. Below we provide feedback on the development of a template for the Learning Continuity Plan and developing a growth model (Item #2).

Learning Continuity Plan Template should ensure that distance learning plans explicitly describe minimum daily synchronous instructional time expectations.

In Item 2, the Board will be receiving a legislative update on the education budget trailer bill (SB 98), which includes a new district planning requirement to substitute for the existing LCAP for the 2020-21 school year. SB 98 requires a Learning Continuity and Attendance Plan template for use by districts to be developed by the SPI in consultation by the Board by August 1, 2020, and requires "distance learning" to include "**daily live interaction with certificated employees and peers for the purposes of instruction, progress monitoring, and maintaining school connectedness**" (Ed Code Section 43503(b)(6)).

Direct synchronous instructional time is critical to learning and was both lacking and highly inequitable during this spring. A recent [Speak UP](#) parent survey in Los Angeles shows that one in three students had contact with their teachers only once a week or less during campus closures this spring, and only 40% of students received any daily live online instruction. African American and Latino students were up to three times less likely to have participated in live classes at least once a week, and up to seven times less likely to have interacted with teachers. In a recent statewide educator survey by Californians Together, 78% of

teachers reported face-to-face instruction of only 3 hours or less a week, and 34% provided face-to-face instruction of 0-1 hours weekly.

These abysmal levels of synchronous instruction and disparities demonstrate inequity in access to the core curriculum. If this level of uneven, unchecked instruction continues into 2020-21, we believe the state will be sanctioning new unconstitutional inequities of opportunity on top of known achievement gaps in clear violation of *Butt v. State of California* (1992).

Whether through distance learning or a hybrid delivery approach, we believe that the state must set clear minimum standards for how much live and synchronous instruction is required instead of delegating that decision entirely to the local level. To ensure that district plans provide detail on how to meet the “daily live” interaction **we recommend the Board direct the SPI to include a statewide minimum requirement in the Learning Continuity plan template and that districts explicitly state what their minimum daily live interaction expectations will be.** We believe that for most grades this interaction should be at least 3 hours per day, and any other proposed level should be explained if addressing age and grade level content variation. It will be important for the template to require a description of the daily live interaction expectations as SB 98 requires districts to specifically “measure participation and assess pupil progress through live contacts and synchronous instructional minutes” (Ed Code Section 43509 (f)(1)(B)(iii)). Without establishing explicit expectations for live instruction, it is impossible to measure participation by all students or student subgroups in the minimum required level of live instruction.

Student Growth Model questions remain unanswered and plans for reporting and communicating about the measure are undisclosed.

We appreciate the forward movement on the student growth model, despite the challenges that will result from the lack of student testing in Spring 2020. While we recognize the gap in assessment data will mean delays in reporting contemporaneous data until 2022, we are pleased that the state will release historical data so that educators and stakeholders can begin to better understand this important tool prior to it going live. However, **we believe it is critical to receive broad stakeholder input prior to making key policy decisions in the use of a residual gain growth model.**

We request the Board provide additional opportunities for public input before taking action to finalize the student growth model. To date, discussion with stakeholders has focused on a theoretical comparison of different growth models, and no data has been shown on how the growth models might report out data using the different growth methodologies. Giving stakeholders access to models with real data will allow for more meaningful engagement, genuine understanding, and feedback critical to this process.

Data presentation along with communication about what the model does and doesn't do, is as important as the choice of the specific statistical model. As we have learned from the multiple iterations of the indicators and displays in the California School Dashboard, the specifics of an indicator calculation, displays, explanations and communication are all important components of any accountability measure.

In particular, if the Board decides to move forward with a residual gain model, we believe there needs to be an opportunity for public input using real data, and details about how different approaches to presenting and explaining the indicator might be considered. Residual gains calculate a difference between a student's actual scale score and an expected scale score. Most educators and the general public have a limited understanding of the scale scores calculated from our statewide summative assessments, let alone the significance of a given score and what it signals. Is a 5-point residual gain important, or only a minor difference from expectation? How will differences across grade and grade ranges be considered?

We expect residual gains will be more spread out in the early grades when year-to-year changes in scale scores are higher. How will this be addressed? Some states and LEAs have converted the raw scale score residual gains to another scale that is more easily understood. For example, the CORE districts convert the raw residual gain scores into a 1-100 rating, with 50 being the mid-point, and then report a 1-10 index score with an associated color rating. They have determined that this is more easily understood by educators and stakeholders than raw residual gain scores. We recommend that the Board and Department consider such a transformation.

In this context, we will be especially interested in promoting and understanding the following:

- **Release historic individual student data in December 2020.** It is unclear whether the planned December release would provide individual students' data to districts. We encourage the Board to release individual student records to districts and schools using 2017-18 and 2018-19 data. Providing district, school, and subgroup data is a great first step, yet the individual student data is what will help educators better understand how the growth measure works and allow them to begin pilot testing it (e.g. using it to take a closer look at past practices, engage in program evaluation and reflect on future local decisions).
- **Consider a 2-year residual gain model for critical 2021 "learning loss" reflection.** In the past months, much academic, policy and economic speculation has been made about the level of learning loss that has occurred because of the COVID-19 pandemic. In addition, the state will be investing billions of dollars targeting the recent learning loss. It is critical to provide a temperature check on the learning loss experience. We ask that the Board direct staff to evaluate the use of a 2-year residual gain measure of growth that students have made from Spring 2019 to Spring 2021, and allow for comparison to past growth (for example from the growth from Spring 2016 to Spring 2018 and the growth from Spring 2017 to Spring 2019). While this data would only be provided once, the value of the analysis would help better understand the loss that individual students have experienced, and for subgroups including low income, English learners, foster youth, special education and racial/ethnic subgroups.
- **Estimated Best Linear Predictor (EBLP) needs more explanation including whether it would delay release of new growth data until fall of 2023.** The concept of the EBLP adjustment to the Residual Gain Model appears promising to improve the year-to-year stability of measures for smaller school and subgroup growth performance. Nonetheless, there is a need for further explanation about how EBLP works before stakeholders can comment on its potential role. Most importantly, in the near term, it will be critical to explain to stakeholders the implications for how the use of EBLP would impact the release timing of future growth data.

We know growth models generally require two years of data to calculate. Given the lack of Spring 2020 data, the earliest new growth data could be provided would be Fall 2022 using Spring 2021 and Spring 2022 data. However, the EBLP requires three years of data. Would the adoption of the EBLP adjustment result in no data being provided based on 2022 data, and instead leave the education community waiting until Spring 2023 for data to become available?

We understand these are unprecedented times and the health and fiscal uncertainties make the work of state policy planning and technical assistance even more challenging. The students, parents, educators and communities represented by our organizations remain strongly committed to provide constructive

feedback and work together to ensure every student enrolled in a California public school, regardless of the modality of instruction, has equitable access to a quality education.

Thank you for your review and consideration of our recommendations.

Respectfully,

Steve Barr
Founder & CEO
Future Is Now

Seth Litt
Executive Director
Parent Revolution

Katie Braude
Executive Director
Speak UP

Bill Lucia
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