



January 6, 2017

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

RE: State Board Agenda Item #2 – January 11, 2017

Dear President Kirst and Board Members:

I write regarding agenda Item 2, “Developing an Integrated Local, State, and Federal Accountability and Continuous Improvement System...”. Superintendent Torlakson’s recommendation on the academic indicator for California’s accountability system at best is incomplete, and worse, could promote the status quo and the continuing failure of the Department to address large and known historical academic achievement gaps bringing into serious question whether the State of California is building any system of accountability or state-local oversight under LCFF that will actually ensure every child has an equitable opportunity to learn.

- **Color coding proposed in this item is a watershed policy decision establishing defacto unconstitutional academic performance standards allowing sustained, state-measured, state-sanctioned, and state-ignored adult failure with all students, and student subgroups in perpetuity at over 1,000 schools. This policy recommendation will legally demonstrate state-intent by sanctioning failure.**
- **The proposed methodology for exclusive use of scale scores, without a vertically scaled instrument across grade levels, is flawed with no attention to spread of scores and failure of assessment to have sufficient items at the low end of performance thereby building in another state-sanctioned masking of massive achievement gaps at aggregate levels and within subgroups; and prevent comparability of performance across schools even within the same district.**

Other Critical Issues to Close Achievement Gaps Remain Unaddressed

EdVoice has raised two key issues over the last several Board meetings that remain unaddressed and that are essential if this system of accountability is actually going to address long-standing inequities of opportunity for California’s neediest children. The accountability system must incorporate **accelerated growth targets for those subgroups of students who are starting farther behind**. Without them, the state is making it clear that it does not actually expect to close achievement gaps.

EdVoice also continues to be concerned by the recommendation to exclude the **Grade 11 academic assessment results as an indicator of high school achievement**. This is especially troubling with the indication that the College and Career Readiness Indicator will not be included

President Kirst and Board Members

January 6, 2017

Page 2

as a state indicator for some time, as it is still being refined. The State Board is sending a clear message that it does not care that over 1,000 high schools, serving almost 1.5 million students are not going to be held accountable for any student academic outcomes except for graduation rates.

Moving Forward

Approval of Superintendent Torlakson's recommendations as proposed would be a dereliction of the State Board's constitutional and statutory responsibility to act as the policy making body over K-12 education and ensure every child, including every English learner, every student in poverty and every foster youth—*which represent 3.9 million students in California*—have an equitable opportunity to access a basic public education.

EdVoice urges the Board to stand firm on its constitutional responsibility for state oversight of the entire system of K-12 public education and take actions to explicitly move beyond talking about equity and provide leadership insisting the Department not overlook persistent failure and fill in the serious gaps in the system architecture with recommendations for action so the state can actually make progress in addressing persistent academic achievement gaps.

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

Respectfully,



Bill Lucia

President, EdVoice

cc: Karen Stapf Walters, Executive Director, California State Board of Education
Judy Cias, Chief Counsel, California State Board of Education
David Sapp, Deputy Policy Director and Assistant Legal Counsel