



May 6, 2016

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 - May 11, 2016

Dear President Kirst and Board Members:

I write regarding agenda Item 2 and developing a new accountability system for California public schools. As the Board engages in its eighth discussion over two years there are still no specific recommendations from the Superintendent, CDE or its contractor for transparency and accountability in California's education system. Agenda items full of information background and questions are not recommendations. It's time for the Board to step up and assume the legislatively delegated authority as the policy making body for K-12 education in California.

The Board must be specific as to the purpose of the accountability system. The priorities of the accountability system must be crystal clear and reflect the State's overall vision and expectation for all schools. EdVoice believes a system of transparency and accountability must help all students to succeed so they can individually make the choice of college or career and not leave the decision to the government bureaucrats at the local district or in Sacramento.

### **Key Indicators Must Be Multiple Meaningful Measures**

- As the proposed indicator of Grade 3 English Language Arts and Grade 8 Math CAASPP scores adds no new information but simply redundantly weights test scores that have already been included (assuming that test scores referred to in the recommendation includes all grades 3-8 and 11 in ELA and math). As proposed, this would simply be a weight, not an additional component metric of multiple meaningful measures. It doesn't give educators or parents any new information to inform changes in practice or educational choices for their children. The Board should not include this indicator only to meet the basic requirement of ESSA but instead identify an indicator of value and develop the plan to institute an indicator that applies to all schools and adds new relevant and holistic information to school and LEA outcomes.
- EdVoice recommends that the Board instead use individual student growth or achievement gap data as the additional indicator, which provide additional meaningful information on students' academic achievement at a school and LEA and by subgroup. In particular this allows the identification of schools and districts that are (or are not) fostering rapid academic achievement progress of students who are starting far below grade level, which is essential if the State is to narrow and close persistent achievement gaps.

### **Process for Annually Reviewing Key Indicators**

- EdVoice recommends requesting legislative authority, or formal rulemaking, to establish the recommended process and expectation for adding indicators to the system, if the current available indicators do not provide measures of what the State values in school and district performance. The Board should direct staff to identify what needs to be done to identify and collect the data that would allow for the indicators they think best reflect the State's priorities and formalize a process for their inclusion in concert with the Legislature.

### **Need Both Support and Assistance Standards AND Ambitious Attainable Goals**

- The agenda item suggests the Board will determine whether the rubrics will include separate standards that reflect ambitious and attainable statewide goals for performance beyond the standards for technical assistance and intervention. EdVoice believes it is critical to set the ambitious yet attainable goals that signal to schools, districts and parents that children are on track to succeed in college and career. If the state sets standards only for support and assistance to identify the lowest performing schools, how will educators, and parents know if all students and subgroups are on track for success in the rest of the state's public schools?

### **Accountability System for Educators and the Broader Public**

- Attachment 5 raises the question whether the evaluation rubrics should include a top-level data display that summarizes LEA- and school-level performance in a manner that is accessible to students, parents, and other stakeholders. **The answer is an emphatic yes!** It is also crucial that it transparently reflects areas of high achievement and significant disparities in performance for student subgroups on indicators. As the core of the State's accountability system, the audience cannot just be bureaucrats at LEAs, counties, or in Sacramento.

We strongly urge the Board to make decisive decisions and give direction in this meeting with an overarching commitment to the belief that every student has the capacity to succeed regardless of ethnicity, income status or zip-code of residence. The Board must demand transparency of outcomes for all students so educators, parents and the public can partner in making sure every public school in California provides every child an equitable opportunity to succeed, and independently make the choice of enrolling in college or a career. The risk of further delays on basic transparency of academic results of all student subgroups at every school, the greater the risk it cannot demonstrate LCFF meets any of its now fading but lofty goals or, at a minimum, protecting the fundamental constitutional right of every student having basic educational equality and opportunity to learn.

Respectfully,

  
Bill Lucia  
President & CEO

Cc: Karen Stapf Walters, Executive Director, California State Board of Education  
Judy Cias, Chief Counsel, California State Board of Education  
Cathy McBride, Deputy Legislative Secretary, Office of Governor Brown  
David Sapp, Deputy Policy Director and Assistant Legal Counsel