



August 28, 2015

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

RE: Agenda Item #14

Dear President Kirst and Board Members:

I write regarding the update on a new “accountability” system, proposed evaluation rubrics, and materials presented this summer to stakeholders related to the attachments in the agenda item.

As proposed, the rubrics omit critical data and limit the authority of policy makers to exercise new authorities to identify schools in need of improvement and intervene when a school district has academically failed its children. The proposed work plan ignores the actual academic achievement of millions of students and pedals backward on accountability. Instead, California should be moving forward toward authentic state-local partnership with all stakeholders promoting transparency, continuous improvement, and accountability for every public school and district. That is the only way for every child to have an equitable opportunity to learn and receive a basic education guaranteed by the state constitution.

Without explicit mention in the rubric, pursuant to Education Code 52072(b)(2)(B) the omission of academic outcomes estops any legal authority from using the available data on persistent academic failure to initiate intervention, essentially repealing any notion of accountability for actual academic outcomes.

Grade level academic achievement and problem solving is bedrock to a basic education. The ability to master academic English and core content in every grade is what parents, higher education segments, and employers all expect from K-12 public schools. However, the recommended accountability system ignores nearly all the objective summative data on basic educational outcomes. And, data on equity-persistent achievement gaps and subpar subgroup academic attainment—available from the state’s new testing program is not used as a metric for any indicator.

As proposed in narrative and tables in this item and related stakeholder materials, available state data on actual academic attainment of millions of students in 12 out of 14 grade levels and content areas from state tests are entirely omitted from consideration of progress toward key indicators. Instead the new “accountability” system emphasizes inquiry into process, inputs, and more mind-numbing acronym-filled micro-management from Sacramento—antithesis to local control and focus on actual outcomes and student performance.

There are over 30 permutations of grade spans in California public schools:

- 14 elementary with up to 2,300 schools in each category
- 6 middle with up to 810 schools in each category
- 4 grade specific - 12th spans with up to 108 schools in each category
- 6 high school with up to 884 schools in each category

As proposed the system of “accountability” ignores academic achievement data and data on achievement gaps. English learner, poverty and Foster Care subgroups are summarily ignored in thousands of schools. Furthermore, mandatory inspection of test scores only twice is too little too late to promote improvement and actionable accountability.

The end of third grade is too late to inquire if all children are reading at grade level to inform discreet system change. Those students not able to read by the end of 3rd grade are more likely to go to state prison than CSU. Similarly, gauging attainment in math only at the end of grade eight is too late to know if the specific schools and districts prior to that grade are preparing every student and student subgroup for grade level math mastery so they can actually succeed in grade eight, and be on a path to enroll and succeed in A-G, STEM, higher education and careers.

The college and career readiness key indicator has no proposed use of high school state testing data as a metric. Tens of thousands of regularly admitted first time CSU freshmen representing the top one-third of California high school graduates require remediation and are not capable of taking exclusively credit bearing college course work. In 2014, over 50% of African American students needed remediation in Math, and over 44% needed remediation in English; and, over 35% of Latino students needed remediation in Math and over 39% in English. These levels are double the national average in data reported to the NCES. The state knows what schools these students attended yet it has no plan to connect the dots and hold the K-12 system accountable.

Taxpayers are investing billions of dollars in California public schools and expect basic accountability to reliably gauge actual student academic achievement. By failing to include all available and relevant objective data, the proposed draft systemically hides achievement gaps and protects persistently failing schools so the adults will never be held accountable. This approach does not fulfill the promise of a new way forward under LCFF/LCAP to establish a structure that values parental and community involvement in partnering with the state and local school districts to promote continuous improvement and ensure resources are spent so every child has an equal opportunity to succeed.

Moving forward as proposed will result in a system-promoted obfuscation of available data on the actual academic achievement of California students and student subgroups in schools, districts and statewide. This will not improve the public’s opinion of the insufficient and unresponsive system of public education in California. The result will be depressed community and parental involvement—not transparency, not continuous improvement, not accountability. And it will lead to more districtwide allocation of supplemental and concentration grants to support the full employment of adults defending the status quo rather than targeting extra help to support the educational attainment of students that need it the most.

Respectfully,



Bill Lucia
President

Cc: Karen Stapf Walters, Executive Director
Judy Cias, Chief Counsel
Brooks Allen, Deputy Policy Director, Assistant Legal Counsel