



July 3, 2015

Dr. Michael W. Kirst, President  
State Board of Education  
1430 N Street, Suite #5111  
Sacramento, CA 95814

**RE: State Board of Education Agenda Item #20 – California Educator Equity Plan**

Dear President Kirst:

As organizations working to close opportunity and achievement gaps for low-income students, students of color, and English learners, we write in coalition to suggest further improvements to the California Department of Education’s (CDE) draft Educator Equity Plan before you consider its final adoption.

We reviewed and provided feedback on a May 2015 version of this plan and are pleased to see that the CDE has considerably improved the draft since then. In particular, it includes data on existing teacher gaps, explores root causes of inequitable access to experienced and qualified teachers, and lays out a series of specific strategies for preparing teacher candidates and for supporting educators through induction and professional development—along with a much clearer timeline for this work. We are also glad to see a plan for annually engaging stakeholders, sharing data, and updating the plan.

**Still, more can be done to improve this plan.** The CDE should develop an inclusive and ongoing stakeholder engagement process. It should include more and better data to describe the extent and nature of educator inequities. As part of this, the state should define and monitor access to effective educators, as most other states have done. The state should address strategies for repairing California’s fast-leaking teacher pipeline and must do more to address inequitable access to inexperienced, unqualified, out-of-field, and effective teachers. In addition, the state should build systems for tracking and sharing data about California’s teachers. We address each of these recommendations in further detail below.

- 1. Increase stakeholder engagement.** Since May 2015, the CDE has taken limited steps to consult with stakeholders, as required by the U.S. Department of Education. Over three separate occasions, the CDE met with or convened individuals representing civil rights organizations, parent organizations, higher education, research organizations, and members of the education coalition. The two June meetings called by CDE were not broadly publicized and did not include outreach to communities beyond the usual suspects in Sacramento, including professional and community organizations with expertise in serving English learners. Indeed, the first we heard of these meetings was when we read about them in this June 2015 version of the plan. However, there is still an

opportunity for the CDE to conduct more extensive stakeholder engagement with a broader group of individuals across the state, particularly parents, students, and individuals representing community-based organizations. We urge the CDE to conduct more engagement than the single annual stakeholder meeting proposed in the plan. In addition, we urge the CDE to make this plan and future plans accessible to the public. This could mean annually creating a two-page community-friendly version of this 63 page plan that summarizes the data, root causes, strategies, and timeline.

2. **Include more and better definitions of teacher quality to describe the extent and nature of educator inequities.** The data presented understates the extent of the inequitable access to prepared and effective educators in California. For example, the plan defines “out-of-field” teachers as only those teachers holding a Limited Assignment Permit, a definition which excludes the significant number of teachers who are “misassigned”—32,075 out of the 339,152 assignments monitored by the CCTC between 2007-2011.<sup>1</sup> The plan also excludes intern teachers from the definition of “unqualified” teachers, even though these teachers are not fully credentialed. The plan should recommend that California state board regulations adopt a definition of a qualified teacher that, as in other states like Connecticut, does not include intern teachers who are still in the process of becoming fully qualified to teach, and the plan’s analyses of inequity should be based on that revised definition. Yet even with these limited definitions, the data are stark:
  1. Students in high-minority schools are *twice as likely* to be taught by an unqualified teacher as students in low-minority schools.
  2. Students in high-minority schools are *nearly five times more likely* to be taught by an intern teacher as those in low-minority schools.
  3. Students in high-poverty schools are *nearly three times more likely* to be taught by an intern as those in low-poverty schools.

In addition, the plan should include data on the extent to which English learners and students with disabilities are less likely to be taught by fully-prepared, experienced, or effective educators, as we know that nearly 60% of intern teachers are teaching in special education settings.<sup>2</sup> Further, the plan should include data on the number of credentials issued to bilingually certified teachers. Research finds that English learners are negatively impacted by shortages of bilingual teachers and teachers with specific capacity to instruct English learners.<sup>3</sup>

3. **Define and monitor access to effective educators.** Even if a teacher possesses an appropriate credential, that does not mean he or she is necessarily effective in improving student achievement, engaging students in learning, and helping children thrive in school. We urge the state to more deliberately and directly take up the issue of how it defines and measures teacher effectiveness. This includes replacing the outdated and ineffective Stull Act with a new teacher evaluation policy framework that helps districts both identify effective teachers using multiple measures, with indicators sensitive to the effective instruction for the various student groups, and identify and support teachers to improve who are not yet effective. This system should yield data on teacher effectiveness using at least three, and ideally four, categories of performance (i.e. not just “satisfactory” and

“unsatisfactory”). Further, we urge the state to monitor access to effective teachers, by performance evaluation category.

4. **Identify root causes and strategies for boosting the pipeline of well-trained teachers.** The plan highlights the frightening data around the fast-leaking teacher pipeline but does not propose specific actions to address it. The state especially needs to address shortage areas like special education, bilingual capacity, math and science, and it needs a plan for how it will recruit candidates of color and those with multiple language skills. Actions might include re-funding successful recruitment programs that California has used in the past, such as the Governor’s Teaching Fellowships, the California Paraprofessional Teacher Training Program, and the APLE loan forgiveness program. In the interim, the CDE can lift up best practices of districts working to improve the pipeline in their communities, such as residency programs, “Grow Your Own” programs, and salary incentives for National Board Certified-teachers to teach in hard-to-staff schools.
5. **Identify additional statewide strategies for ensuring equitable access to qualified and effective teachers.** The plan includes clear descriptions of statewide strategies for preparing teacher candidates, improving the credentialing process, supporting educators through induction, and delivering professional development. However, it falls short when it comes to addressing challenging working conditions in high-need schools, and for attracting educators to teach at these schools. The plan theorizes that by providing high-need schools with more funding via the Local Control Funding Formula, they will be able to improve working conditions to attract and retain high quality educators, lessening educator turnover and inequitable access to excellent teachers. This is certainly an important part of the solution and is part of the value proposition of “local control” and LCFF. However, the plan should identify what additional *statewide* strategies will be used to improve working conditions, attract qualified and effective educators to high-need schools, and develop the specific skills and competencies of educators that will allow them to thrive in schools serving high concentrations of students of color, English learners, and low-income students. We know, for example, that salaries affect districts’ ability to recruit and retain a fully-prepared teacher workforce.<sup>4</sup> California, with its current low level of overall per-pupil-spending relative to other states, needs to analyze and address the extent to which its underinvestment in public education fuels inequitable access to fully prepared and effective educators in the neediest schools and districts.
6. **Build better systems for tracking and reporting data about California’s teachers.** In 2011, the State eliminated the emerging CALTIDES teacher database. The lack of a comprehensive teacher information system severely undercuts the state’s ability to track teachers from preparation program through employment, assess the quality of its teaching force as a whole, spot trends that require state or local policy responses, and develop professional development programming. It has also reverted public education officials to relying on a laborious paper process for monitoring and correcting out-of-field and under-qualified teacher misassignments. As a consequence, corrections to misassignments often happen late or not at all during the actual period of the teaching assignment. The state should present a plan for resurrecting work on CALTIDES or building an alternate teacher database. Further, the state should develop a plan for reporting data on equitable

access to qualified and effective teachers at both the state and district levels on an ongoing basis.

Although the plan is considerably improved and meets the minimum guidelines set forth by the U.S. Department of Education, we urge the SBE to request these substantive changes before the plan is submitted. We are committed to working closely with CDE and SBE to ensure that California's students, including low-income students and students of color, have access to teachers and school leaders who enter the profession well-prepared to succeed and who prove themselves effective once there.

Sincerely,

Ryan J. Smith  
Executive Director  
The Education Trust – West

John T. Affeldt  
Managing Attorney/Education Program Director  
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Jan Gustafson Corea  
Chief Executive Officer  
California Association for Bilingual Education (CABE)

cc: Members of the California State Board of Education  
Karen Stapf Walters, Executive Director, California State Board of Education

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<sup>1</sup> <http://www.ctc.ca.gov/reports/AM-2007-2011.pdf>

<sup>2</sup> <http://www.ctc.ca.gov/commission/agendas/2011-11/2011-11-5A.pdf>

<sup>3</sup> Maxwell-Jolly, J. & Gandara, P. (2012). *Teaching All Our Children Well: Teachers and Teaching to Close the Achievement Gap*, and Timar, T.B. & Maxwell-Jolly, J., (Eds.) *Narrowing the Achievement Gap: Perspectives and Strategies for Challenging Times* (pp.163-186), Harvard Education Press, Cambridge MA.

<sup>4</sup> State Superintendent of Public Instruction Tom Torlakson's Task Force on Educator Excellence, *Greatness by Design: Supporting Outstanding Teaching to Sustain a Golden State*, at 20 (Sept. 2012); Adamson, F. & Darling-Hammond, L. (2011). *Speaking of Salaries: What It Will Take to Get Qualified, Effective Teachers in All Communities*. Washington, DC: Center for American Progress. This study was cited in *Greatness by Design*, but its data is from the 2008-2009 school year.