December 17, 2015

Mike Kirst, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

Via email only (sbe@cde.ca.gov)

Re: Coalition Comments re: Developing a New Accountability System/
LCFF Evaluation Rubrics/Every Student Succeeds Act

Dear President Kirst:

We represent a coalition of civil rights, advocacy, community, parent, student and other organizations who have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF). LCFF creates an historic opportunity to focus resources on helping California’s neediest students overcome the barriers they face in closing the achievement gap and graduating college and career ready. It also promises a new level of transparency and local engagement for parents, students, and community members in the design of their local schools. As you know, in an effort to give life to these objectives, we have commented jointly multiple times over the last year regarding the State Board of Education’s LCFF regulatory proposals and evaluation rubrics/accountability system items.

Since the last Board meeting, we have been hard at work trying to develop consensus recommendations for moving forward with key aspects of the Evaluation Rubrics. We have made considerable progress in that regard. At the same time, we, like the Board, have been confronted with the recent passage of the federal Every Student Succeeds Act (ESSA) and its demands on state accountability systems. This development has further refined our thinking. Accordingly, we write to:

(1) Express our belief that California should adopt a coherent state/federal accountability system that integrates both LCFF and ESSA requirements and avoids the dual system of accountability experienced under the prior API/AYP systems.

(2) Share consensus recommendations of our organizations including:

(a) a preferred subset of key and associated indicators that achieve both LCFF and ESSA coherence;

(b) a top-level Evaluation Rubrics display that incorporates equity into the overall assessment of an LEA or school; and,

(c) the need for a streamlined set of performance labels throughout the rubrics.

I. Key & Associated Indicators Aligned to LCFF & ESSA

As you will see from the attached, in an effort to merge LCFF and ESSA requirements we propose the five Key Indicators set forth below (as opposed to the current proposed seven). As an initial matter, we recommend the Key Indicators themselves be the organizing principle for the Evaluation Rubrics and that the Rubrics not be organized and displayed under three (or more) policy statements. We feel that drilling down from Policy Statements to Key Indicators to Metrics adds an extra layer that is unnecessarily cumbersome. With only five Key Indicators, we do not believe the Rubrics display would be unduly complicated or hard to understand. If the Board wishes to retain the Policy Statement layer,
then we recommend grouping these five Key Indicators under the three overarching policy statements we have previously proposed to the Board (namely, Access & Opportunity; On Track for Graduating College & Career Ready; and Graduating College & Career Ready).\footnote{Note, we may have additional edits to our list of indicators and metrics as we further ponder the implications of ESSA and gather further input from stakeholders.}

Our proposed five Key Indicators are:

- Access & Opportunity
- Academic Achievement
- English Learner Proficiency
- School Climate & Engagement
- Graduating College & Career Ready

Access and Opportunity is required by LCFF’s first state priority and the Williams legislation and by the “course access” state priority. Academic Achievement and EL Proficiency are required by ESSA (and LCFF). School Climate and Engagement is an LCFF-inspired articulation of ESSA’s “other school quality” indicator. Graduating College and Career ready is a merging of ESSA’s required graduation indicator with LCFF’s similar indicator and its call for college and career readiness for California graduates.

The proposed metrics for measuring each of the Key Indicators are set forth in the Indicators attachment. Of note, the composite outcome scores in English language arts, math, and science denote more complete illustration of student achievement performance across grade spans rather than the unduly narrow metrics of simply third grade reading or eighth grade math as currently proposed. Also, we feel it important to add an additional metric of growth in both ELA and math that reflects cohort growth scores over time across grade spans, an element entirely missing from the current proposal before the Board.

II. Top-Level Evaluation Rubrics Display Incorporating Equity

Our proposed top-level Evaluation Rubrics display (attached) illustrates the Overall performance assessment earned by an LEA or school for each of the five Key Indicators and would clearly illustrate whether or not meaningful equity gaps exist. We recommend that the Overall assessment represent a composite of Outcome, Improvement, and Equity. Further, the flag would identify any subgroups that were particularly problematic for the district or school on this metric or Key Indicator.

By bringing equity into the top-level Rubrics display in this way, we believe that the intents and purposes of LCFF are more fully realized. That is, accountability attention is paid to both overall continuous improvement and to closing achievement and other equity gaps. And no school or district is judged excellent if it has large gaps and disparities between subgroups.

The second proposed display is intended to model the first “drill down” below the top-level Rubrics display. It captures the performance of the LEA or school, and for each subgroup, on each of the metrics that contribute to the Key Indicator Overall assessment. This drill down is meant to be experienced through an interactive online portal. As such, users may not choose to look at all of these metrics for all of the Key Indicators at once. However, in the event they do, we think the information should fit on one screen or one piece of paper as illustrated.

III. Aligning Performance Labels in the Rubrics
As a final matter, we note that the latest draft of the Evaluation Rubrics from WestEd contain 3 different sets of performance labels—one set for outcome performance (Very High, High, Intermediate, Low, Very Low), one for growth performance (Improved Significantly, Improved, Maintained, Declined, Declined Significantly), and one for overall performance (Excellent, Good, Emerging, Issue, Concern). While no set by itself is problematic, taken together, having 3 different sets of labels for a total of 15 different possible performance characterizations unnecessarily adds complexity and confuses matters. We would urge that a single or streamlined set of performance labels be adopted to apply across the various dimensions by which performance will be judged.

IV. Displaying Sub-Group Performance

Finally, we have also considered ways to display the next level of “drill down,” specifically, subgroup performance on the Key and associated Indicators. One approach would be to replicate the first drill down chart discussed above but with a focus on a particular subgroup. Another (see attachment, with and without color coding) would be to have an alternative display for subgroup performance that captures the cycle of inputs, processes, and outcomes experienced by the subgroup at a school or district level.

Thank you for the opportunity to comment. We look forward to continuing working with the State Board of Education to realize the full promise of LCFF.

Sincerely,

John T. Affeldt
Managing Attorney
Public Advocates Inc.

Oscar E. Cruz
President and CEO
Families In Schools

Jesse Hahnel
Executive Director
National Center for Youth Law

Taryn Ishida
Executive Director
Californians for Justice

Brian Lee
California State Director
Fight Crime: Invest in Kids

Sarah Lillis
Director
EdVoice Institute for Research and Education and COO

Katy Nunez-Adler
OCO Organizer
PICO California
Nayna Gupta  
Racial Justice Fellow/Staff Attorney  
ACLU of California

Araceli Simeon-Luna  
Project Director  
Parent Organization Network

Ryan J Smith  
Executive Director  
The Education Trust - West

Shelly Spiegel-Coleman  
Executive Director  
Californians Together

cc: Members, California State Board of Education  
Karen Stapf Walters, Executive Director, California State Board of Education  
Judy Cias, Chief Counsel, California State Board of Education  
Nancy Brownell, Senior Fellow, Local Control and Accountability  
Michelle Magyar, Local Control Funding Formula  
Jeff Bell, Department of Finance  
Cathy McBride, Governor’s Office  
Jannelle Kubinec, Director of National, State and Special Projects, WestEd
New Key Indicators/Metrics:
- Added a School Climate and Engagement key indicator as reflected in ESSEA
- High School Composite of Readiness (Replaces 11th Gr CAASP/EAP and moved up to Key Indicator)
- Suspension Rate (Moved up as metric under Key Indicator)
- Parent Involvement in School Activities (Moved up as metric under Key Indicator)
- A-G Enrollment, K-8 Course Access by grade span, % in Alt. Ed. (Moved up as metrics under Key Indicators)
- Added Scores-Growth Composite (Science)*

Swapped/Replaced Key Indicators/Metrics:
- Composite Reading and Math Scores (Replace 3rd Gr Reading & 8th Gr Math)
- Chronic Absence (Swapped with Attendance Rate by Grade Span)
- EL Lang Proficiency Growth (Replaces EL Composite)
- % LTEL (Replaces EL Reclassification Rate by Grade Span)

*** This composite score would be a combination of multiple criteria that measure preparedness for college-level coursework including: Early Assessment Program (11th grade testing), SAT, ACT, AP, and Dual Enrollment-Community College.
# EVALUATION RUBRIC - EQUITY DISPLAY MOCKUPS – Updated 12/16/15

## Top Level Display

<table>
<thead>
<tr>
<th>Key Indicator</th>
<th>Overall</th>
<th>Flags</th>
<th>Improvement</th>
<th>Outcome</th>
<th>Equity</th>
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<tr>
<td>ACCESS AND OPPORTUNITY</td>
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<td>LI, EL, AA, FY</td>
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<td>3</td>
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<td>ACADEMIC ACHIEVEMENT</td>
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<td>ENGLISH LANGUAGE LEARNERS’ PERFORMANCE AND PROGRESS</td>
<td>Concern</td>
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<td>1</td>
<td>N/A</td>
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<tr>
<td>SCHOOL CLIMATE AND ENGAGEMENT</td>
<td>Excellent</td>
<td>AA, FY, EL</td>
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<td>5</td>
<td>4</td>
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<tr>
<td>GRADUATING COLLEGE AND CAREER READY</td>
<td>Concern</td>
<td>EL, LI, AA, Native American, FY, SPED, Native American</td>
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## Legend

<table>
<thead>
<tr>
<th>Number</th>
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<td>Concern</td>
<td>Significantly Declined</td>
<td>Very Low</td>
<td>Very Large Gaps</td>
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<td>2</td>
<td>Issue</td>
<td>Declined</td>
<td>Low</td>
<td>Large Gaps</td>
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<td>3</td>
<td>Emerging</td>
<td>Maintained</td>
<td>Intermediate</td>
<td>Moderate Gaps</td>
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<td>Good</td>
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<td>High</td>
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<tr>
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<td>Excellent</td>
<td>Improved Significantly</td>
<td>Very High</td>
<td>No Gaps</td>
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## Drill Down

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<td>Williams – instructional materials</td>
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<td>Williams – Teachers</td>
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<tr>
<td>Williams – Facilities</td>
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<td>5</td>
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<tr>
<td>A-G Enrollment</td>
<td>Issue</td>
<td>EL, AA</td>
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<td>K-8 Course Access, by grade span</td>
<td>Concern</td>
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<td>% Students in Alt. Ed.</td>
<td>Concern</td>
<td>FY, AA</td>
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<thead>
<tr>
<th>ACADEMIC ACHIEVEMENT</th>
<th>EMERGING</th>
<th>AA, SPED, LI, FY, Native Hawaiian</th>
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<td>ELA SBAC Performance (Composite)</td>
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<tr>
<td>ELA SBAC Growth (Composite)</td>
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<tr>
<td>Math SBAC Growth (Composite)</td>
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<table>
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<tr>
<th>ENGLISH LANGUAGE LEARNERS' PERFORMANCE AND PROGRESS</th>
<th>CONCERN</th>
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<td>Concern</td>
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<table>
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<tr>
<th>SCHOOL CLIMATE AND ENGAGEMENT</th>
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<th>AA, FY, EL</th>
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<tr>
<td>Chronic Absence Rate</td>
<td>Good</td>
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</tr>
<tr>
<td>Suspension Rate</td>
<td>Good</td>
<td>AA, FY, EL</td>
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<td>School Climate Surveys</td>
<td>Excellent</td>
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<td>5</td>
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<td>5</td>
</tr>
<tr>
<td>Parent Involvement in School</td>
<td>Excellent</td>
<td>N/A</td>
<td>5</td>
<td>5</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>GRADUATING COLLEGE AND CAREER READY</th>
<th>CONCERN</th>
<th>EL, LI, AA, Native American, FY, SPED, Native American</th>
<th>3</th>
<th>1</th>
<th>1</th>
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<td>Cohort Grad Rate</td>
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<td>High School Composite</td>
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</tr>
<tr>
<td>Complete A-G</td>
<td>Concern</td>
<td>SPED, EL, FY</td>
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<td>CTE Pathway rate</td>
<td>Issue</td>
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</table>
Equity Rubric Model

- Williams Requirements
- % of Students Enrolled in an Alternative School
- % of 3rd Grade Students Reading at Grade Level
- High School Cohort
- % of 8th Grade Students Meeting or Exceeding Grade Level Mathematics Standards
- % of 12th Grade Students Completing A-G and/or CTE Pathway
- Reclassification
- Graduating High School College and Career Ready
- Attendance Rate by Grade Span
- Long Term English Learners (LTEL)
- Other English Learners Specific Measures
- Bilingual Program Access
- Seal of Biliteracy
- % Receiving ELD
- % of English Learners in Special Education
- On Track Early Indicators to Graduate College and Career
- % Receiving College and Career Ready
- Access and Opportunity That Support Learning

English Learners
Williams Requirements

% of Students Enrolled in an Alternative School

% of 3rd Grade Students Reading at Grade Level

High School Cohort

% of 8th Grade Students Meeting or Exceeding Grade Level Mathematics Standards

Graduating High School College and Career Ready

% of 12th Grade Students Completing A-G and/or CTE Pathway

Access and Opportunity That Support Learning

On Track Early Indicators to Graduate College and Career

Attendence Rate by Grade Span

Other English Learners Specific Measures

% of English Learners in Special Education

Seal of Biliteracy

Reclassification

% Receiving ELD

Long Term English Learners (LTEL)

Biliteracy Program Access

Graduating High School College and Career and Career Ready

Biliteracy Program Access

Seal of Biliteracy

Reclassification

% Receiving ELD

Long Term English Learners (LTEL)