



The Education Trust–West



November 3, 2023

Dr. Linda Darling-Hammond, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

RE: LCFF Equity Coalition Comments re SBE Agenda - November 8-9, 2023

Item 08: *Revision of Performance Standards of Local Indicators within the California School Dashboard and Recommended Action Regarding the Local Indicator Self-Reflection Tool for Priority 1: Basic Services and Conditions.*

Item 09: *Approval of the Recommended Observation Protocol for Teachers of English Learners to Satisfy Criterion 2 (Teacher Evaluation of English Learner Students) and Criterion 3 (Parent Opinion and Consultation) for Reclassification, per the requirements of Education Code Sections 313 and 313.3.*

Item 16: *California Community Schools Partnership Program Update. Presentations by the CCSPP State Transformative Assistance Center and the Southern Inland Regional Transformative Assistance Center.*

Dear Dr. Darling-Hammond & State Board Members:

We represent a coalition of civil rights, advocacy, community, family, student, educator and other organizations that have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF) and its accountability system, both at the state and local levels. We are committed to ensuring that LCFF lives up to its equity promise to focus resources on helping California's neediest students overcome the barriers they face in graduating college and career ready and accessing a more equitable school system.

Please consider the following points for Items 08, 09, and 16, to be discussed before the Board on November 8-9. The Equity Coalition has also submitted a separate letter on Item 07.

Item 08: *Revision of Performance Standards of Local Indicators within the California School Dashboard and Recommended Action Regarding the Local Indicator Self-Reflection Tool for Priority 1: Basic Services and Conditions.*

A. The Progress and the Work Still Ahead for Priority 1

Firstly, we extend our appreciation to the Department and the Board for the dedicated work and collaboration with our coalition and other stakeholders to develop and adopt the objective criteria for reporting the teacher component of Priority 1 at the September State Board meeting. As we noted then, we look forward to building on that work to improve the teacher quality Priority 1 local indicator next year by adding the required school-level data to the school pages of the CA School Dashboard. Since reliable school-level data is also available in the Teaching Assignment Monitoring Outcomes (TAMO) dataset, school-level Priority 1 teacher information must also be reported in the Dashboard per the education code (Ed. Code section 52064.5(c): "...No later than January 31, 2021, local indicators shall reflect school-level data to the extent the department collects or otherwise has access to relevant and reliable school-level data for all schools statewide" (emphasis added).). The legislature clearly intends that, where local indicator data is valid and reliable down to the school level, the Dashboard report on both district-level and school-level performance.

We are also eager to work together next year to develop an equity component to the teacher indicator. The education code also calls for local indicators with reliable school level data to include "the extent of any disparities across the schoolsites within school districts" (Ed. Code section 52064.5(e)(2)). We suggested a simple intra-district gap analysis to show the disparity between the school with the highest and lowest percentages of Clear teaching assignments within a district. Or a bar graph comparing schools' percentages of Clear teaching assignments for stakeholders to visually compare the disparities among schools in a district. The Education Trust - West recently launched a data mapping tool—the [TAMO Data Dashboard](#)—that serves as a powerful example of the many possible visualizations of this data at the state, county, district, and school levels. The equity component we envision must also provide information on the equitable access to Clear teachers by student race/ethnicity and income.

B. There should be holistic integration of the Objective Criteria for Reporting the Teacher Component of Priority 1 and the Revised Local Indicator Self-Reflection Tool for Priority 1: Basic Services and Conditions.

We appreciate that this is the first effort at incorporating statewide, objective criteria into a local Dashboard indicator. We are concerned that there may be confusion in the field among community interest holders, LCAP committees and local school board members on the two strands of Priority 1 data being presented, i.e., the objective Clear teacher data and the local self-reflection data from the SARC on the *Williams* basic services and conditions. Accordingly, we urge the Board to give direction to CDE to provide clear directions and guidance to LEAs to incorporate and present together both strands of information on teachers, instructional materials and facility quality to community stakeholders and the local board as they engage in their local LCAP development and adoption conversations. For example, in addition to instructing LEAs to "report the results as part of a non-consent item at the same public meeting of the local governing board/body at which the LCAP is adopted" (per this item's memo), LEAs could be instructed to update its board on the new objective criteria for reporting the teacher component for Priority 1 and show how this local indicator will appear in the CA School Dashboard. LEAs should encourage school board and community members to look at the TAMO data *with* the self-reflection tools to assess how the district is making progress toward ensuring basic services and conditions.

C. There is no actual need at this time to reduce the teacher quality information on vacancies and EL misassignments found in the self-reflection tool.

The current self-reflection tool contains *districtwide* information on the number of vacancies and English Learner (EL) teacher misassignments gathered from the LEA's SARCs. This data is publicly reported nowhere else. The Department appears to believe that adoption of the objective criteria on Clear teacher assignments requires a removal of teacher data from the self-reflection tool, but we see no statutory requirement in Ed. Code 52064.5 that compels that result. Especially, as the Priority 1 teacher indicator is rolling out with objective criteria and not yet fully aligned to the robust local indicator envisioned by the legislature (see A., above), we believe it appropriate to continue the self-reflection reporting of teacher data as well at this time.

D. Revise the performance standard for Priority 1.

The SBE [adopted a standard](#) by which LEAs measure their progress in meeting *Williams* basic services at its September 2016 meeting. This standard must be updated by the Department and the Board now that this local indicator is a hybrid comprising objective criteria for teacher quality from the TAMO database and self-reflection tools using data drawn from SARCs. The existing standard is that an LEA "annually measures its progress in meeting the *Williams* settlement requirements at 100% at all of its school sites;" and the Department proposed the following measures at that time: number/percentage of misassignments of teachers of English learners, total teacher misassignments, and vacant teacher positions. As we noted above, we suggest you keep those measures in place, and it will still be necessary to add to the performance standard to account for the new teacher component of Priority 1. We strongly recommend that the revised performance standard require LEAs to certify their Teaching Assignment Monitoring Outcomes data in CALPADS for 100% of its school sites. Therefore, LEAs that do not certify their TAMO data would be identified as not meeting the standard. This is consistent with the Board's 2016 decision to require LEAs report teacher-related data for every school site.

Item 09: Approval of the Recommended Observation Protocol for Teachers of English Learners to Satisfy Criterion 2 (Teacher Evaluation of English Learner Students) and Criterion 3 (Parent Opinion and Consultation) for Reclassification, per the requirements of Education Code Sections 313 and 313.3.

We want to thank CDE and the SBE for the continued work on the OPTTEL and the presentation on the Validation Study Report by WestEd. The LCFF Equity Coalition is also pleased to see that the Validation Study Report supports the adoption of the OPTTEL for use by teachers during the reclassification process. We also note WestEd's finding of data showing multiple areas of only moderate alignment between OPTTEL results and ELPAC results as well as between OPTTEL results and teacher perceptions of student readiness for reclassification.

We agree that the use of the OPTTEL will help to standardize Criteria 2 and 3 for reclassification. We strongly recommend that districts use the OPTTEL across the state to bring standardization to the two elements of the reclassification criteria and understand that requiring its use would need legislative authority. The coalition also strongly supports WestEd's recommendation that such discontinuities indicate the "need to provide guidance and supports for educators to implement the OPTTEL tool in a way that ensures it is being used consistently."

As for the fourth criteria for reclassification, *Comparison of student performance in basic skills against an empirically established range of performance in basic skills based on the performance of English proficient students of the same age*, we are encouraged that the Department is interested in discussing the possibility of doing a comparability study to determine

if level 4 on the ELPAC is predictable of EL students being able to demonstrate basic skills on the CAASPP leading to a possible standardization of the fourth criteria.

We appreciate the inclusion of the narrative field that allows teachers to describe accommodations included in a student's IEP that may have had an impact on their rating. In order to ensure that students' disabilities, or the teachers' perception of such, are not unreasonably precluding them from reclassification, we request clarity on what adjustments may be appropriate to include in this section.

Finally, in an attempt to make parent consultation an accessible, meaningful, and realistic component of the reclassification process, it should be made clear that digital signatures from parents are allowed, in the case of Zoom or telephone consultation, or other provisions if a parent is unable to be present in person for a consultation.

Item 16: California Community Schools Partnership Program Update. Presentations by the CCSPP State Transformative Assistance Center and the Southern Inland Regional Transformative Assistance Center.

In the upcoming RFA review, we ask CDE to ensure equitable access for schools with the greatest need to this transformative program, including rural schools and schools serving the lowest-performing students by considering all areas of priority in addition to the UPP. On the forthcoming Cohort 3 Implementation Grant process, the memo for Item 16 on community schools states that "the CDE anticipates the unduplicated pupil percentage (UPP) cut off range for future cohorts will be for school sites serving between 70% and 75% unduplicated pupils" because of a shortage of funding. In the most recent round of grants, the cut off UPP for prioritized schools was 68% for all schools, and 58% for small and rural schools, and CDE stressed in the RFA that all areas of priority would be considered. This approach provided greater program access for schools serving the lowest-performing students, including Black students and students with disabilities.

Rural schools, however, have been disproportionately excluded from the CCSPP. In every SBE meeting to date, concerns have been raised by rural applicants and advocates about the participation of rural LEAs in the program. [Research](#) shows that this is due to the UPP cut off for prioritized applicants being too high for many rural LEAs. Increasing the UPP cut off even more in this round could result in even less rural schools being prioritized. Going forward, if the CDE wants to be more inclusive of rural schools, new approaches to increasing participation should be considered. Perhaps more weight could be given to rural LEA classification in the scoring rubric compared to the other priorities. A few rural LEAs that were awarded planning grants in round one managed to secure implementation grants in round two—Regional Technical Assistance Centers should make a concerted effort to assist the remaining 67 rural LEAs with planning grants in applying for future rounds of implementation grants, including by partnering with community-based organizations to reach students, families and educators to strengthen outreach for Round 3 Implementation Grants to ensure a diverse and robust number of LEAs and school sites apply. Or perhaps special carve outs for rural schools need to be added to the CCSPP, like the Title V, Part B programs in the Every Student Succeeds Act (ESSA) specifically available for small and rural schools.

Also, allocations have gone out to county offices of education for the coordination of partnerships between county government agencies and nonprofit organizations to support

community schools. The counties will receive at least \$200,000 and up to \$500,000 annually, for seven years and the first two rounds of allocations have already gone out, with almost all counties receiving allocations. However, the legislation offers little detail on how the allocations should be spent and how guidance will be provided to support alignment with the CA Community schools Framework. Examples of county level children's cabinets in LACOE and through AB2083 should be used as models for how to use the resources from coordination allocations. Effective integrated support systems include joint leadership, collective goals, shared data, aligned funding, community engagement, and coordinated services. The resources could be used to hire a full time staff member to manage the county level integrated support system. The CDE and S-TAC must determine who will provide guidance and technical assistance to counties on how to effectively use the coordination allocations in alignment with the CA Community Schools Framework. And these efforts should not be separate from existing California efforts to integrate systems through AB2083, SB-75, the California Child Welfare Council, California Interagency Coordinating Council on Early Intervention, Cradle to Career Data System, First 5 California, and the Children and Youth Behavioral Health Initiative.

Further, a wealth of knowledge on community schools exists throughout the state. The state must continue to ensure that all layers of the systems of support, the S-TAC, R-TACs, COEs with coordination allocations, and the LEA grantees themselves, live into the cornerstone commitment to shared power and collaborative decision making by tapping into the invaluable expertise across our system, including among community partners and non-profit organizations that have dedicated their efforts to school transformation and community schools for years. We look forward to the upcoming S-TAC webinars and communities of transformative practice spaces. We expect the S-TAC to partner with and feature the expertise of those, including students, families, educators and community partners, who have deep expertise in school transformation. Similarly, we expect RTACs to do the same in their regional learning spaces. We also look forward to hearing in the first year evaluation about the work of the S-TAC, RTACs and COEs that received coordination allocations to leverage the expertise that exists across our state.

Lastly, given the transformative nature of this investment and the need to coordinate and align planning and spending, the S-TAC, R-TACs, COEs that received coordination allocations and CDE should direct LEAs to reflect their community schools actions and spending, including from the CCSPP, in their LCAPs. A [2023 report by Public Advocates](#) revealed that less than half of the 49 districts that received CCSPP Implementation Grant awards mention community schools in their LCAP. And less than one-third (15 out of 49) included a community schools action in their LCAPs. This undermines the utility of the LCAP as a comprehensive strategic planning document and hinders coherent, sustainable planning.¹

We appreciate the hard work of staff at the California Department of Education as we work together to revise and improve state accountability processes and share our collective experiences in California's continuous improvement experiment. The LCFF Equity Coalition looks forward to continuing our collaboration with you to address the needs of California's most marginalized students and communities.

¹ ["Realizing the Promise of LCFF: Recommendations from the First Ten Years,"](#) Public Advocates, at p.27.

Respectfully,

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