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May 3, 2024

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

Via email: [sbe@cde.ca.gov](mailto:sbe@cde.ca.gov)

**RE: LCFF Equity Coalition Comments re: SBE Agenda, Items 2, 3 and 4 – May 8, 2024**

*Item 02: California Community Schools Partnership Program: Approval of Cohort 3 Implementation Grantees.*

*Item 03: The California Assessment of Student Performance and Progress and the English Language Proficiency Assessments for California: Approval of the 2023–24 Apportionment Rates and Updates on Program Activities.*

*Item 04: Reading Difficulties Risk Screener Selection Panel (RDRSSP): Recommendation of Review Process, Review Elements and Evaluation Criteria, and Rubric for Evaluating and Approving Screening Instruments.*

Dear President Darling-Hammond and State Board Members:

We represent a coalition of civil rights, advocacy, community, parent, student, educator, and other organizations that have worked diligently on the 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 the 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. Our commitment extends to LCFF's foundational principles of meaningful local engagement, which are informed by a new level of transparency and accountability in their local schools.

For the last decade, our coalition has advocated for strengthening and broadening the state's accountability system to reflect how it currently operates and how it should operate to support LCFF's goal of continuous improvement. We share our comments regarding Items 2, 3, and 4 on the SBE May agenda.

- I. **Item 02: California Community Schools Partnership Program: Approval of Cohort 3 Implementation Grantees**

The LCFF Equity Coalition supports the CA Partnership for the Future of Learning's comments on this item.

We applaud the Department's proposal to award 995 Implementation Grants in Cohort 3, nearly doubling the number of schools embracing this transformative whole-child approach to creating optimal learning environments. We urge the state to expedite the distribution of these funds to schools. Across our network, we are witnessing the profound impact of these transformative school investments on students and families.

While we support prioritizing Planning Grantees in this next round of Implementation Grants, we are concerned about the possibility of limiting this final cohort solely to schools in current Planning Grantee LEAs. There are still high-need school communities within existing Implementation Grant districts that have not yet applied for funds but serve historically marginalized populations far exceeding existing thresholds used by CDE for prior cohorts. Often, the most impacted communities lacked the resources to apply in prior rounds. This underscores the importance of preserving funding for the final round of this program *and* seeking ways to move beyond a time-bound initiative. We must collaborate to ensure that the funding for this equity-driven program is preserved, expanded, and made permanent beyond the sunset of this initiative.

Given the transformative nature of this investment and the need to coordinate and align planning and spending, the S-TAC, R-TACs, and CDE should direct LEAs to reflect their community schools' actions and spending, including from the CCSPP, in their LCAPs. This will enable communities to understand this critical strategy in the context of the district's comprehensive education plan.

## **II. Item 03: The California Assessment of Student Performance and Progress and the English Language Proficiency Assessments for California: Approval of the 2023-24 Apportionment Rates and Updates on Program Activities.**

State Board of Education staff are planning to write an informational memo in June on the English Language Proficiency Assessments for California (ELPAC) in transitional kindergarten (TK) and are looking for input from the Board on what should be considered in writing this memo. We are encouraged that the Board and the Department of Education (CDE) are taking a deeper look at this issue and provide these comments to support the Board members in providing direction to staff on the June memo. We understand that CDE staff and several members of our coalition have been meeting to discuss this issue. Since the assessment was initially designed for kindergarten students, it is an open question whether all of the domains of the assessment (reading, writing, listening, and speaking) as it's currently administered are valid and reliable in designating the language status as we expanded universal TK to younger populations of four-year-old students. We are encouraged by the efforts to seek a solution to address possible unintended consequences and find an alternative that is developmentally and age-appropriate for the initial identification of English learners and the summative

administration. In particular, we have an interest in learning more about the validity/reliability of the reading and writing domains for four-year-olds. In addition, we encourage the memo to investigate what guidance could be provided to the field of the administration of the assessment for our TK classrooms and the timeline for the development and dissemination of such guidance.

**III. Item 04: Reading Difficulties Risk Screener Selection Panel (RDRSSP): Recommendation of Review Process, Review Elements and Evaluation Criteria, and Rubric for Evaluating and Approving Screening Instruments.**

We appreciate the references and consideration for English learners in the elements and evaluation criteria. We offer the following language to be included in the final draft which addresses the issue of screening in the English learner's home language and the language of instruction for students in dual language programs being taught literacy in a language other than English.

EC Section 53008(g)(1)(A)–(E). There is research and much agreement in the field that for screeners of young English learners, it is important to screen in their home language and English. If you are only screening in English (including the oral directions), many students will present as having difficulties. However, having results in English and the home language gives a much more comprehensive picture of what they know and are able to demonstrate. In addition, for students in dual language programs who are learning to read in a language other than English, they too should be assessed in both languages.

Suggested revision to (B):

Measurement of domains that may predict dyslexia and other reading disorders, including, but not limited to, measures of oral language, phonological and phonemic awareness, decoding skills, letter-sound knowledge, knowledge of letter names, rapid automatized naming, visual attention, reading fluency, vocabulary, and language comprehension in **both English and the home language for English learners and students who are learning to read in a language other than English.**

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Thank you for the opportunity to comment. We look forward to your discussion of these items and to continue our collaboration to realize the full promise of LCFF-- and especially to address the needs of California's most marginalized students and communities.

Respectfully,

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