



January 12, 2024

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 - January 18, 2024

Item 04: *2025 California Mathematics Instructional Materials Adoption: Approval of the Schedule of Significant Events, Reviewer Application, Adoption Notice, Criteria Map, and Standards Maps.*

Item 08: *Developing an Integrated Local, State, and Federal Accountability and Continuous Improvement System: Recommended Action Regarding the Local Indicator Self-Reflection Tool for Priority 6: School Climate. **Request to remove from consent.***

Item 13: *State Educational Agency Approval of the 2023–24 Local Educational Agency Comprehensive Support and Improvement Plans Authorized Under the Every Student Succeeds Act Section 1111(d). **Request to remove from consent.***

Dear President Darling-Hammond and 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 level. We are committed to ensuring that LCFF lives up to its equity promise to focus resources on helping California’s high-needs 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 informed by a new level of transparency and fiscal accountability in their local schools.

Please consider the following points for Items 04, 08, and 13, to be discussed before the Board on January 18. Our comments are drawn from our many years of experience working with community partners – students, families and other education interest holders.

- I. **Item 04: 2025 California Mathematics Instructional Materials Adoption: Approval of the Schedule of Significant Events, Reviewer Application, Adoption Notice, Criteria Map, and Standards Maps.**

Last year, the Equity Coalition supported adoption of the revised Mathematics Framework, which included principles of equity and strategies to meet the needs of California’s diverse

student population. If implemented properly, the Framework can help to close opportunity gaps in math instruction – making math culturally relevant to students of color and multilingual students and supporting English learners by leveraging their language assets in the classroom.

A robust materials adoption process is an essential step in ensuring the Framework truly addresses those opportunity gaps in math instruction. However, we find that the criteria are very limited, where there should be more of a focus on equity overall. The current map seems to only address issues of equity and the needs of English learners in Category 4: Access and Equity. This should be incorporated throughout the map or should explicitly state that the items in Category 4 must be embedded throughout the regular instructional materials and cannot be included as supplemental resources or in a separate workbook.

On the Draft Application to Serve on the Review Panel

We suggest that the SBE insert stronger language about the expertise of educators in delivering instruction for English learners and students with disabilities in the *Draft Online Application to Serve on the Review Panel*. The current language states that “*At least one such teacher shall have experience in providing instruction to English learners, and at least one such teacher shall have experience in providing instruction to students with disabilities.*” This criteria does not guarantee strong expertise in serving these students. We would expect the majority of educators to have experience in delivering instruction to ELs and students with disabilities, but ensuring that there is strong expertise on the panel on top of experience will be critical.

We request that the language be replaced with “*At least one such teacher shall have extensive experience and expertise in providing designated and integrated ELD instruction to English learners, and at least one such teacher shall have extensive experience and expertise in providing instruction to students with disabilities.*”

Evaluation Criteria Map

We find that an additional level of specificity is needed to both guide and incentivize content developers to incorporate language development. We note that the needs of ELs are primarily limited to *Category 4: Access and Equity*. However, in order to foster a coherent and integrated approach to language, we recommend a stronger throughline across categories. This approach recognizes the central role that language plays in enacting the California Mathematics Framework. Below are some examples to illustrate the value of embedding an intentional focus on language across key categories:

- In *Category 2: Program Organization*, we note the criteria to “*fully integrate content strategically designed opportunities for students to use the mathematical practices.*” **Recommend the addition of a focus on language in the instructional design in order to develop students' capacity to formulate and critique mathematical arguments.**
- In *Category 3: Assessment*, the evaluation criteria already includes “*Assessments integrate mathematics content and the language needed to participate in the Standards for Mathematical Practice*”. This level of guidance can benefit from more specificity. **We propose adding guidance such as: “In addition to assessment of math content, instructional materials will also provide embedded assessments of disciplinary language.”**

- In *Category 4: Access and Equity*, we recommend the following:
 - **Criterion 4.1 should include revised language for scaffolds that specify the interdependency of content and language, such as “...consistent scaffolds that allow for work along “language and content” learning progressions.”**
 - **Criterion 4.3, rather than “adapting” materials (which often implies “dumbing down” materials), should suggest that materials provide teacher guidance for amplifying the language needed to participate meaningfully in content learning.**
- In *Category 5: Instructional Planning and Support*, to avoid the tendency to lower the cognitive demands, we must signal that materials maintain the rigor but attend to varying language levels. **We recommend the following revision to 5.8: “Materials provide examples of student work [at varying levels of English proficiency from emerging to bridging] and representation of possible student strategies to orient teachers to student thinking and help teachers elicit, make sense of, and respond to student thinking.”**

We believe that the evaluation criteria should more explicitly include guidance on intentional language supports in instructional materials to address the needs of multilingual learners. For example, there are rubrics and tools available that should be incorporated, such as Criteria for Review of Instructional Materials’ Success in Addressing MLL Linguistic and Instructional Needs, published by the California Curriculum Collaborative and rubrics and guidelines for instructional materials for English learners from the [English Learner Success Forum](#). More explicit language is also necessary to guide and incentivize content developers to embed language development in tasks, investigations, and assessments.

In addition, the review process is fundamentally flawed in and of itself. Employing a merely pro forma approach, educators are asked to engage in 4 days of training and spend countless hours reviewing the instructional materials - all without pay. We believe that the many evidence-based instructional practices within the Framework can benefit LEAs, schools, and educators. Therefore, we hope that the state provides additional resources and supports to ensure this rich guidance reaches the field and multiple audiences – such as LEA leaders, educators, and families – and includes professional learning opportunities, tools, and resources.

II. Item 08: Developing an Integrated Local, State, and Federal Accountability and Continuous Improvement System: Recommended Action Regarding the Local Indicator Self-Reflection Tool for Priority 6: School Climate. Request to Remove from Consent.

We understand and appreciate the modest amendments proposed for the school climate self reflection tool. We believe, however, that more needs to be done to disaggregate the reporting of school climate data and, in particular, believe it critical that the data be reported on Dashboard at the school level. A positive, inclusive, and equitable school climate is foundational to school and student success, and thus understanding school conditions and climate at the school site level is vital to California’s accountability and continuous improvement system. Disaggregated school-level data about students’ experiences help inform families, educators, advocates, and policymakers whether all students have equal access to education and are treated fairly and appropriately.

Meaningful accountability for improving school climate for students requires that LEAs analyze and report their climate data so that results can be reported and compared across student groups, schools, districts and statewide – all of which is important for ensuring equal educational opportunity, community transparency, and continuous system improvement. *This self-reflection tool must help educators meaningfully address opportunity gaps and disaggregate student impact at the school site level*; it is not for LEAs to merely identify trends.

Thus, we request the addition of the following language to the instructions and Prompt 1, respectively:

- “At a minimum, report school site-level climate data, as identified in California Education Code 52052, when such data is available as part of the local school climate survey.”
- “Describe the local climate survey data, including available data disaggregated by student groups *and at the school site level*.”

Several school sites and districts have already started to gather such data, which is publicly available, understanding the vital need to support students’ physiological, social, and emotional growth in addition to their cognitive development as a part of school climate improvement efforts. It is well known that schools within the same LEA often have much different school environments and offer very different experiences to students, yet by aggregating survey results to the district level, the needs of schools with serious climate issues may be overlooked. *As with the Dashboard Priority 1 Teacher Quality indicator discussed at this Fall’s Board meetings, we urge the Board to rethink its past practice of only reporting local indicators at the LEA-level. Where reliable school-level local indicator data exists, there is no reason to withhold that information from local communities and from the local continuous improvement conversation.*

The Equity Coalition is also heartened to see an elevation in the importance of gathering demographic data with CDE’s proposed revisions; however, the instructions in the self-evaluation tool still allow LEAs great flexibility in deciding what to do with its climate survey and which surveys to use (i.e., those that do not ask for student demographics). The flexibility allowed to LEAs on this indicator is a disservice to students and their families and advocates, and must be addressed as we work to improve students’ experiences of school climate.

III. Item 13: State Educational Agency Approval of the 2023–24 Local Educational Agency Comprehensive Support and Improvement Plans Authorized Under the Every Student Succeeds Act Section 1111(d). Request to Remove from Consent.

The Board is required under the Every Student Succeeds Act (ESSA) to approve **school site** improvement plans for the federal Comprehensive Support and Improvement (CSI) schools. We reiterate our strong concern, as we have expressed every year that this item has appeared on the agenda, that the CSI plans have only received the most cursory of reviews and deserve more oversight and attention. These schools represent the highest-need school sites in the state and have ended up on the CSI list, in part, because they have not received the necessary attention and oversight from their local educational agencies (LEAs).

We strongly recommend that this item be taken off consent, where the Board has a deeper discussion regarding quality review of these plans. This becomes all the more important, given the large overlap of CSI and Equity Multiplier schools, as well as for the new requirement to report on specific actions in the Local Control and Accountability Plan (LCAP) for schools

scoring red on Dashboard indicators like the CSI schools do. In these recent policy changes, the Administration has recognized the need to focus greater attention on our highest-need schools. Ensuring that CSI plans are high quality and aligned with Equity Multiplier and LCAP actions should be a part of that review.

ESSA statutory requirements lay out a set of actions and analyses by the LEA that the state expects to be conducted through the School Plan for Student Achievement Process (SPSA). It is widely understood that the SPSA processes are uneven, at best. In addition, ESSA is clear that the review and oversight of CSI improvement plans should be more than the cursory review by county offices of education (COEs) that a district's LCAP has filled in the prompts in the federal addenda. ESSA requires a more thorough review and monitoring of these plans as opposed to the current, insufficient approach to reviewing CSI plans.

Though the State Board is required by federal law to review and approve school site CSI plans, it is not doing so; nor does it appear that the current approval process provides the necessary level of oversight. The local school board-approved school site plans are only being reviewed by COEs (if that), which themselves provide only a cursory review of a district's summary description of all of the CSI plans for its schools, largely or entirely by merely reviewing and approving an LEA's LCAP.

In the LCAP template, the LEA is required to summarize actions planned for all the CSI school sites and report how the district will monitor and evaluate the plans' implementation. However, these responses can be short and inadequate to ensure that the CSI plans will have the desired impact at these school sites and may represent a summary of many schools' plans, especially in large districts. There is little guidance provided to COEs on the necessary elements in these brief LCAP summaries to meaningfully approve not only the LCAP but, through that LCAP, to also meaningfully review and approve all the district's CSI plans. The approval by the COEs is of the district's LCAP, and not of the actual CSI plans which COEs are not required to actually review as part of the LCAP review. Thus, no external "state educational agency" entity is reviewing actual CSI plans, and the requirements of federal law are not being met.

We urge the Board to update county office LCAP/federal addendum approval rules by (1) providing COEs with objective review and approval criteria and (2) requiring that COEs more directly review and recommend approval/denial by the State Board of Education of individual school CSI improvement plans and (where multiple CSI schools exist) overall LEA CSI coordination according to those criteria. In sum, federal law requires State Board review and approval of these plans which is a much higher expectation than is currently being provided. If the discussion is not to be had at this Board meeting, ***we request a future agenda item to discuss how the system of support is meeting this federal education obligation to our highest-need students.***

We appreciate the hard work of staff in the California Department of Education and look forward to continuing our collaboration with you to address the needs of California's most marginalized students and communities through the LCAP process.

Respectfully,

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