



March 1, 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 and 3 - March 6, 2024**

***Item 02:** Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Review of the 2023 California School Dashboard and 2022–23 Data Release and 2024 Accountability Workplan.*

***Item 03:** Developing an Integrated Local, State, and Federal Accountability and Continuous Improvement System: Update Regarding Exploring the Feasibility of Adding a Subset of Standardized Questions for Inclusion in School Climate Surveys for Reporting Results in the Local Indicator Self-Reflection Tool for Priority 6: School Climate.*

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 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 informed by a new level of transparency and fiscal accountability in their local schools.

For the last decade, our coalition has advocated to strengthen and broaden 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 in relation to Items 2 and 3 on the SBE March agenda.

We urge you to consider the following points:

- *When considering English learner (EL) progress, disaggregate data to ensure separate consideration for various EL profiles, review cut scores for status on ELPI, and incorporate principles of the EL Roadmap into the System of Support.*

- Consider identification of districts and/or schools for Differentiated Assistance (DA) or Comprehensive Support and Improvement when incorporating science assessment results onto the Dashboard.
- Adhere to California Education Code Section 313.1 in defining LTELs and use the 15-student threshold for both districts and schools for LCAP reporting purposes – and extend that threshold to foster and homeless youth.
- Collect and report on TK student group data across state indicators.
- The College/Career Indicator (CCI) should integrate data capture of both college and career opportunities. The Board should clarify the intent that this indicator is for **both** college **and** career preparation.
- Incorporation of student-level growth model data cannot wait, and we urge the state to start its work planning process now.
- The Priority 1 teacher indicator must add both a school-level reporting and an equity component.
- Include data on multilingualism for teachers in Dataquest.
- Recalibrate weight of Dashboard Indicators to better capture academic outcomes and uplift overall accountability, in discussion with the Coalition.
- Strengthen reporting of disaggregated data at the school site level for Priority 6, and timely move forward the process.

Please also accept our extended comments below to be discussed during the March 6 SBE meeting:

**I. Item 02: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Review of the 2023 California School Dashboard and 2022–23 Data Release and 2024 Accountability Workplan.**

**A. When considering English learner (EL) progress, disaggregate data to ensure separate consideration for various EL profiles, review cut scores for status for ELPI, and incorporate principles of the EL Roadmap into the System of Support.**

The Equity Coalition strongly believes that English learner (EL) progress must be disaggregated, where current data capture masks the results for EL only (ELO) students as well as the various EL profiles (long term English learners (LTELs), newcomers, etc.), including:

- **Academic Indicators:** For English Language Arts, there are more districts than the previous years scoring at the lowest performance level (red) on the California Dashboard. The aggregate of ELs and RFEPs identifies 255 districts, constituting approximately 39% of eligible districts; but when disaggregating for ELs only, 427 districts are identified as red. That is 71% of districts having a red performance level for their current ELs only and 11 districts or 2% for their RFEPs. Disaggregating the two student groups for next year's Dashboard will increase transparency and high expectations.
- **English Learner Progress Indicator (ELPI):** Only 60 districts received a red rating on ELPI this year. That is very close to just one district per county. What is more concerning is that these 60 districts only enroll 33,598 English learners – just 3% of the state's English learners. At the November 2023 SBE meeting, board members suggested that a session be set at a future board meeting to review the issue of ELPI accountability. Now that the ELPI is complete, we urge the Board to schedule a session to review the cut

scores for “status” that create a very low level of expectation and aspiration for progress toward English proficiency.

- **Differentiated Assistance:** The aforementioned issues directly affect whether districts will be eligible for support through Differentiated Assistance. Only 152 districts qualify for Differentiated Assistance for EL performance. The indicator only captures a small number of districts - where there are even fewer that receive differentiated status on the basis of the ELPI. Of that number, only 28 districts were red for ELPI qualifying for Differentiated Assistance, enrolling just 12,035 English learners. The significance of the ELPI is diminished and gives districts false evidence as to how well their students have progressed in learning English if the cut scores for “status” are not elevated.
  - For those few districts that will be eligible for DA, we recommend the System of Support incorporate the English Learner Roadmap as a framework for identifying the root cause and plan for continuous improvement. The principles of the EL Roadmap – the SBE adopted English learner policy – address all aspects of the education of English learners and would provide targeted guidance for improvement.

**B. Consider identification of districts and/or schools for Differentiated Assistance (DA) or Comprehensive Support and Improvement when incorporating science assessment results onto the Dashboard.**

The Equity Coalition is heartened to see forward movement on fully incorporating student science performance into the accountability system. Science has not been included in the state’s multiple measures accountability system, following the adoption of new science standards. As CPAG and the SBE develop a longer-term plan to fully add science as a state-level indicator to the Dashboard, we urge you to consider identification of schools and/or districts for Differentiated Assistance (DA) eligibility.

**C. New Student Populations: Transitional Kindergartners (TK) and Long-Term English Learners (LTEL)**

As CPAG and the SBE consider data capture on TKs and LTELs for accountability purposes, we urge the following considerations:

1. **Long-Term English Learners: Adhere to EC Section 313.1 in defining LTELs and use the 15-student threshold for LCAP purposes – not only for LTELs, but also for foster and homeless youth.**

The Coalition appreciates the recommendation that LTELs be separate from the total EL student group for ELPI for the state indicators. We recommend that after identifying the LTEL group for accountability on the Dashboard, districts use the state definition in California Education Code Section 313.1, which is more detailed in defining the actual needs of LTELs. In addition, it would be helpful if CDE released guidance that addressing students at risk of becoming LTELs should be a part of the goals, actions and services to prevent students from becoming LTELs.

We understand that California Education Code Section 52052(a)(3)(B) defines long-term English learner as a numerically significant subgroup at 15 students at the district level, as opposed to ESSA, which federally defines the threshold size at the school site level at 30 students. We thus recommend that the SBE amend the State ESSA Plan, so that 15 is the threshold for both district and school site accountability. If necessary, we recommend asking the US Department of Education for a waiver.

We also strongly recommend extending this threshold to foster and homeless youth, to help create parity.

## **2. Transitional Kindergartners (TK): Collect and report on TK student group data across state indicators.**

The Equity Coalition is glad to see the inclusion of the TK student population, reported separately from kindergarten students, in the Dashboard in 2024 pursuant to the requirements in California Education Code Section 60900(d)(4)(A). We are pleased to see that data is currently, for the 2023-2024 school year, being collected for chronic absenteeism and suspension rates. This data will be essential in understanding how much of their TK education students are currently accessing and provide some of the information about why they are unable to access their education (e.g., whether students are being excluded from school for disciplinary reasons or are unable to attend for other reasons).

It is important to collect and report on TK student group data *across state indicators*. There are a variety of state indicators that would not be relevant for the TK student population (e.g., academic testing, high school graduation, and college and career ready rates) but there are other state indicators that we believe are very important to collect and report data on:

- **Expulsion Rates:** Studies show that the [youngest children](#)—and disproportionately the youngest black children—are the most likely to be expelled or pushed out of school due to behavioral problems. Exclusionary discipline and criminalization practices are developmentally inappropriate and ineffective, and they disproportionately marginalize children of color, Native children, and children with disabilities and delays. We know that these behavioral problems do not magically disappear when a child transitions from preschool to TK. We strongly recommend that expulsion data be collected and reported for this very vulnerable student population.
- **One-Year Drop Out Rate and/or Lost Transfer Rate:** In preschool and TK, it is commonly reported by parents that they are told their children can no longer attend a school. They are not formally expelled and do not receive any of the due process protections that they have a right to, yet they are still barred from attending school. For this reason, we believe adopting a One-Year Drop Out Rate and/or a Lost Transfer Rate for TK students will bring to light the extent of school push out experienced by these students. We also stress that this addition is in line with Dashboard Principles 8 (measures are valid and reliable) and 11 (subject to continuous revision and improvement) to ensure we understand the extent that informal school pushout is impacting TK students.
- **Stability Rates:** Looking at the stability rates, and conversely the instability, of TK students is another important data point to understand their ability to access their education.
- **Staff Data:** There have also been reports of nationwide early education staffing shortages. [FACT SHEET: The U.S. Department of Education Announces Partnerships Across States, School Districts, and Colleges of Education to Meet Secretary Cardona's Call to Action to Address the Teacher Shortage | U.S. Department of Education](#) Measuring the number and percentage of TK students taught by fully-credentialed teachers is significant to understand the significance of the early educator shortage in California, as well as the quality of education that TK students are receiving.

We also strongly recommend that all the TK data be made available on both the Dashboard and Dataquest. This is important as it is another avenue for the public to access the data. Additionally, reporting on DataQuest allows for looking at the intersectional nature of the data. For example, looking at TK suspensions and expulsions by race, disability, and/or foster care status tells a much richer story than without those additional data points.

As with all data, having reliable data helps everyone understand what barriers are currently facing students and it is the first step in better meeting student needs. Ensuring that the Dashboard and DataQuest reports all relevant state indicators for TK students will fulfill the mandate created by California Education Code Section 60900(d)(4)(A).<sup>1</sup>

**D. The College/Career Indicator (CCI) should integrate data capture of both college and career opportunities and the Board should clarify this intent.**

The LCFF Equity Coalition has continuously advocated that the CCI is a measure of both college **and** career, not one or the other, to ensure that our state's goal is for all students to have equal opportunities to succeed in college and career readiness. The Board has engaged in robust and lengthy discussions on this topic and CDE staff indicated that when state-level data is available for both college and career opportunities, the intent is that the CCI will measure both, but that currently it does not. We urge the Board and the Department to make clear that the State's goal, whether long- or short-term, is to measure the ability of our schools to prepare students to be prepared for postsecondary life. In today's economic and social environment, this demands post-secondary education **and** career preparation, not one or the other.

**E. Incorporation of student-level growth model data cannot wait.**

Student growth is the gold standard of school accountability and is part of state accountability systems in 48 other states. It is a more "fair" indicator of a school's support of its students as each student has the opportunity to make strong growth regardless of prior performance.

While we are heartened to see reporting of CAASPP summative assessment score for the 2021-22, 22-23, 23-24 school years, we believe that CDE cannot wait to develop a work plan with the full incorporation of the indicator into the Dashboard. We believe that a student growth model should be a component of the Dashboard, and that the work plan should reflect the need to determine how and when to incorporate it into the Dashboard. Such options include: 1) combining a school's current academic indicator and data from the growth model to create a new composite academic indicator, or 2) have the growth model become a stand-alone indicator.

In addition, since the growth model is structured using matched student results, we recommend that the current ELs and RFEPs be reported separately in the growth model to see the trajectory

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<sup>1</sup> California Education Code section 60900(a) (4) To provide an efficient, flexible, and secure means of maintaining longitudinal statewide pupil level data between and among the state's educational segments and operational tools, as defined in Section 10861, including, but not limited to, all of the following:

(A) Pupil level data from all grade levels, **inclusive of transitional kindergarten programs**, as described in Section 48000, that shall be collected separately from kindergarten pupil data, in elementary and secondary schools, including, but not limited to, juvenile court schools, alternative schools, continuation schools, special education schools, and adult educational programs offering a high school diploma or equivalency. [emphasis added]

of growth for each group. If EL students reclassify during the period of reporting, their scores should be included in the EL group for that year to show the growth to proficiency. Growth to RFEP status is exactly what we want to incentivize – not immediately ding the district for reclassifying the student and then removing all their growth from the EL group.

The Board should direct the CDE to run simulations of different options using historical data to decide an approach, and convene an advisory group. Student growth can be measured using two years' data, and this data is valuable for school districts to evaluate programs locally.

#### **F. Plan for future improvements to the Priority 1 teacher quality indicator**

It is critical that the general public, particularly students and families, have reliable access to data that show when and where students are being taught by teachers who are fully credentialed and properly assigned to their grade level(s), subject area(s), and student subgroup(s), that is, access to Clear teachers, by school site, as well as how their experience compares within their district and statewide. We appreciate the SBE's recent adoption of an objective criteria and updates to the self reflection tool for the Priority 1 teacher indicator on the Dashboard. This is the first year since LCFF was instituted that the data sources can truly support authentic, local conversations on how to address teacher shortages.

Building on this important progress, SBE must add **both school-level reporting and an equity component to the Priority 1 teacher indicator** on the CA School Dashboard during the next opportunity to make improvements to the Dashboard. Reliable school-level data is available for this local indicator in the Teaching Assignment Monitoring Outcomes (TAMO) dataset, therefore, school-level Priority 1 teacher information must also be reported in the Dashboard per the education code (California Education 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"). Currently a stakeholder looking up their school site in the Dashboard would not see information on teacher quality even though school level data is available. They would need to visit their LEA page that contains a link to the DataQuest TAMO report with a district listing of each school's data on Clear teaching assignments. This falls short of fully integrating school-level data into the Dashboard. We acknowledge this is a shift and requires the Department to add a local indicator to the Dashboard's school pages, but it is a necessary change for the Dashboard to become a more publicly accessible and user-friendly data system for students, families, community members, advocates, decision-makers, and other stakeholders.

We also look forward to developing an equity component for the Priority 1 teacher quality 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)). Last fall we suggested a simple intra-district gap analysis to show the disparity between the schools 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 created a series of visualizations that serve as a great example for an equity component by pairing TAMO and student enrollment data in their [TAMO Data Dashboard](#). An equity component must provide information on the equitable access to Clear teachers by student race/ethnicity, income, and multilingual learner status. Data on disparities is crucial because we know districts in low-income communities across California that serve predominantly students of color, multilingual learners, students with disabilities and other

historically underserved students are less likely to have experienced, fully qualified, and appropriately assigned teachers in classrooms.

Lastly, and related, the Equity Coalition is grateful that CDE is resuming its publication of teacher demographic data this year. We must be able to track the racial/ethnic diversity of our teacher workforce in order to improve the recruitment and retention of teachers of color, and ultimately reflect the racial/ethnic diversity of our student population.

**G. Recalibrate weight of Dashboard Indicators to better capture academic outcomes and uplift overall accountability, in discussion with the LCFF Equity Coalition.**

The weighting in the state’s Dashboard Indicators is currently imbalanced, where we are concerned that the academic indicators have less weight than non-academic indicators.

Priority 4	Priority 5	Priority 6
Math English Language Arts (ELA) English Development Progress  <i>Possible future additional indicators</i> Science Math Student Growth ELA Student Growth	Chronic Absences	Suspensions

As seen above, relating to elementary districts, these indicators do not have equal weight in helping to identify which districts might need support and differentiated assistance. Rather, the state has decided to weight each state priority equally but not each indicator.

Thus, when there are multiple indicators in the same state priority, those indicators have less weight. A district could be red in English learner progress, math performance and ELA performance, and when combined these three indicators would have equal weight as having a red rating for chronic absenteeism. Thus, the relative importance of academic indicators is less than for other indicators. And, if other recommendations in this letter are eventually adopted (adding science assessment and growth models to the Dashboard), the weighting imbalance will get even worse. We believe that this undervalues the importance of academic performance relative to the other indicators. This imbalance is particularly important for English learners when a LEA is English Development and Academic performance, yet the LEA is not identified for DA.

The state uses a different weighting scheme for federal law purposes for identifying schools for support and assistance. The federal model (ESSA) weighs each indicator equally. We believe that it is confusing to have two different weighting schemes – one for state purposes and one for federal purposes and believe that at least equal weight should be provided for the academic indicators.

The Equity Coalition would like to engage in further discussions with relevant CDE and SBE stakeholders, including potential exploration of statutory changes as needed. We are concerned

that the current weighting system subverts the overall intent of LCFF by undervaluing student achievement and avoiding, thereby, needed assistance from the System of Support.

**II. *Item 03: Developing an Integrated Local, State, and Federal Accountability and Continuous Improvement System: Update Regarding Exploring the Feasibility of Adding a Subset of Standardized Questions for Inclusion in School Climate Surveys for Reporting Results in the Local Indicator Self-Reflection Tool for Priority 6: School Climate.***

The Coalition understands and appreciates the modest updates relating to the school climate self-reflection tool. We are heartened to see further exploration of a standard set of questions by CDE. We agree that 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 are important for ensuring equal educational opportunity, community transparency, and continuous system improvement.

However, more needs to be done to mandate the reporting of disaggregated school climate data. 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. Relating to the SBE's January 2024 discussion relating to Priority 6, 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), and the report attached to Item 03 further elucidates the need to mandate disaggregated data reporting across the board. 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.

In addition, the Priority 6 indicator 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, it is 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.

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.

Lastly, we appreciate survey vendors' recommendations for getting comparable survey information, but are concerned that commissioning an entire psychometric assessment will further delay this Priority 6 survey from making it to the field. Given the acknowledged next fiscal year and assumed subsequent fiscal year financial constraints, we request that the Board explore with CDE how the Priority 6 survey could be deployed more immediately.



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

Respectfully,

John T. Affeldt, Managing Attorney  
Connie Choi, Senior Legislative Counsel  
**Public Advocates**

Steven Almazán  
Director of Policy and Partnerships  
**EdVoice Institute**

Bryan Becker  
Director Public Policy & Advocacy  
**Parent Organization Network**

Martha Hernandez  
Executive Director  
**Californians Together**

Yasmine-Imani McMorris  
Director of Education Equity  
**Children's Defense Fund CA**

Edgar Lampkin, Ed.D.  
Chief Executive Officer  
**California Association for Bilingual Education**

Sarah Lillis  
Executive Director  
**Teach Plus California**

Magaly Lavadenz  
Leavey Presidential Endowed Chair in  
Ethics and Moral Leadership,  
Executive Director  
**Center for Equity for English Learners,  
School of Education, Loyola Marymount  
University**

Ileana Lopez  
VP of External Relations  
**Parent Institute for Quality Education**

Robert Manwaring  
Senior Policy and Fiscal Advisor  
**Children Now**

Kristin Power  
Vice President, Policy & Advocacy  
**Alliance for Children's Rights**

Natalie Wheatfall-Lum  
Director of TK-12 Policy  
**The Education Trust-West**

CC:

Brooks Allen, Executive Director, State Board of Education (SBE), [brallen@sbe.ca.gov](mailto:brallen@sbe.ca.gov)  
Sara Pietrowski, Policy Director, SBE, [SPietrowski@sbe.ca.gov](mailto:SPietrowski@sbe.ca.gov)  
William McGee, Director, CDE - Student Achievement & Support Division, [wmcgee@cde.ca.gov](mailto:wmcgee@cde.ca.gov)  
Nancy Kim-Portillo, Chief Deputy Superintendent of Public Instruction, [NKPortillo@cde.ca.gov](mailto:NKPortillo@cde.ca.gov)  
Joshua Strong, Administrator, Local Agency Systems Support Division, [JStrong@cde.ca.gov](mailto:JStrong@cde.ca.gov)  
Cindy Kazanis, Director - Analysis, Measurement & Accountability Reporting Division,  
CDE, [CKazanis@cde.ca.gov](mailto:CKazanis@cde.ca.gov)