May 5, 2016

Dr. Michael W. Kirst
President, State Board of Education
1430 N Street
Sacramento, CA 95814

Subject: Item 2 – LCFF Rubrics

Dear Dr. Kirst:

We appreciate the hard work the State Board has done in striving to develop an implementation system for the Local Control Funding Formula that balances local control and accountability. The challenge of harmonizing state and federal statutes in a manner that avoids a one size fits all approach to education, while ensuring all students have equal access to educational opportunities, is massive. We appreciate the Board taking this challenge head on and working to develop a system that both acknowledges that most school districts, administrators, teachers, other school personnel and parents do their best to meet the needs of our students, while also identifying and assisting districts that need the most support.

As one of your key partners in the development and implementation of the major, transformative and welcome changes underway in our education system—new standards focused on college and career readiness, a new funding formula and decision making structure, and a shift away from the test based API to new, holistic accountability measures—we offer the following concepts for your consideration in the adoption of the Rubrics. Our recommendations and critique of the suggested key indicators included in the most recent staff memorandum are based on the following principles:

- State law and policy is on the right track and should continue to drive efforts for continuous improvement of our education system.

- One size does not fit all. The shift to locally developed priorities, approaches and goals with a focus on outcomes and continuous improvement in state priority areas is wise.

- A holistic review of performance and outcomes cannot occur with an overreliance on tests and quantitative indicators due to their limitations.

- Consistency matters and change takes time. Local efforts need to be given time to bear fruit.

- Assistance, including resource-based intervention, will be needed if over time, local efforts fall short of the continuous improvement of outcomes sought.

- The Local Control and Accountability Plan and Annual Updates are the heart of the new system that focuses on continuous improvement. The Rubrics should guide the related local self-reflection, resource allocation decisions, and establishment of goals and improvement efforts. They should not abandon the holistic approach outlined in the LCFF statutes in order to “fit” with a federally driven system focused on test scores.
The Board should resist the temptation to take the easiest course of action presented, which is to reverse course in the wake of ESSA and adopt an accountability system that is almost completely driven by standardized test scores and the lagging high school graduation rate indicator. While it may take time and effort to, for example, “determine whether or how school districts that do not use the SARC template could input the data” to assess conditions of learning (April 27, 2016 SBE Memo) and conduct “careful analysis and modeling” regarding how to implement the “promising” course taking indicator (May Item 2), the Board should not be dissuaded from these essential tasks. The LCFF rubrics development process has taken too long and involved too much hard work to, in the end, simply fall back on the data that have been used for federal compliance purposes in the past. California became a national leader with the enactment of the LCFF and the implementation of the LCAP process that addresses all the state priorities. The Board can maintain this leadership position by setting an example to integrate the ESSA requirements without being wholly shaped by them.

The Superintendent’s Advisory Task Force on Accountability and Continuous Improvement in which I served as co-chair, working with a diverse set of stakeholders, carefully crafted a report which should be considered and incorporated into your work before adopting any proposal at your meeting scheduled next week. The work of the Task Force worked tirelessly to create a consensus document that is rooted in the principals of performance, equity and improvement. California should remain committed to the concept of multiple measures that is reflected in the work of the Task Force.

An approach that combines quantitative and qualitative indicators to assess school performance is what state law requires. It reflects the move away from the API to a holistic assessment that considers school and career readiness, access and opportunities for student learning, as well as graduation. A holistic system is the better approach to evaluating our schools to identify those that excel and those that need assistance to improve student outcomes. The state should stay the course because it can maximize new flexibility under federal law in aligning the rubrics to ESSA requirements.

We believe the rubrics should include a combination of quantitative and qualitative measures—a holistic approach as outlined in the statute that considers the eight state priority areas. We recognize there are challenges of analyzing qualitative data; however, they are critical for a meaningful approach to a comprehensive whole-child accountability system. We are very concerned that the key indicators suggested in the latest memorandum over emphasize standardized tests, focus almost exclusively on only one of the eight state priority areas—pupil outcomes—and fall woefully short of the innovative, holistic assessment required by law.

Aligned with the ESSA requirements and the LCFF legislation, and informed by the considerable work of the Accountability/Continuous Improvement Task Force, we recommend the following key indicators be included in the Rubrics:

(1) Student test scores, the math and English language arts state assessments conducted in 3-8 grade and once in high school,

(2) High school graduation rates,

(3) Progress of English learners towards English language proficiency,

(4) Implementation of state standards, to meet the ESSA requirement for additional academic indicators for elementary and middle schools. (This data is being collected under LCAP State Priority Area 2.)
(5) A school climate survey that considers breadth and depth of courses offered; social emotional learning; parental involvement; working and learning conditions; access to school nurses, counselors and librarians; school attendance; and the Williams requirements. (Most of this data is currently being collected by the CDE, and is included in LCAPs, the SARC and the California School Climate, Health and Learning Survey.)

(6) Depth and breadth of access to college and career readiness activities and courses, to meet the ESSA requirement of an additional indicator and consistent with the state priority area that focuses on conditions of learning and course access. (This data is being collected under LCAP State Priority Area 7.)

The approach outlined above would rely equally on qualitative and quantitative indicators, and would include both outcome data and critical information about the opportunities being given to kids. It also moves away from too much focus on math and English test scores and the resulting neglect of other subjects as well as consideration of multiple qualitative metrics.

As discussed in the staff memorandum and shown in the Alberta model, qualitative data can be collected in a manner that is consistent across the state, where results can be differentiated and can complement test scores and other quantitative data to achieve a holistic assessment of schools.

As a transition strategy, the state could use the SARC/Williams requirements as a key indicator of conditions of learning. As the April 27th memo notes, the Williams requirements have been in place for more than a decade. They have been integrated into the SARC, which must be completed by all schools, and are included in the SARC template already used by most schools. To facilitate local efforts to integrate the Rubrics and the LCAP, as well as compliance with federal requirements, the state could implement an automated process for districts to upload the relevant SARC data, thus creating a standard for how that data is reported, as the statute demands. While the Williams requirements and SARC data could be used as a key indicator in the Rubrics even without that standardized input, it may ease implementation, facilitate review of the data on a statewide basis and help the state meet the differentiation standard under ESSA.

We believe the approach outlined in the latest memorandum retreats to a failed strategy that primarily relies on test scores, lacks early leading indicators, and includes elements that are subject to manipulation (e.g., suspension rates). It looks more like the API and less like the holistic, innovative accountability structure intended in state law for the LCAP.

It appears the recommended approach is in part based on a narrow definition of how the ESSA “differentiation” standard can be met and potential constraints of readily available data. We believe state and federal law provide more flexibility and the Board can adopt the approach we recommend. First, differentiation does not require data across a spectrum and can be achieved through a binary determination, as is the case in some of the Williams requirements and in the Alberta model. Second, the state is not limited to data that is already collected consistently across the state and available in a statewide database. While the law requires the Board adopt the Rubrics by this fall, it can phase in indicators and data elements during implementation as data becomes available in a manner that meets the Board’s criteria and policy.

**Bottom line: It is more important to get it right, than to do it fast.**

We know from past efforts that once established, systems are likely to remain in place for years. Inertia is a powerful force. Consistency and stability are important – and key to any longitudinal evaluation of outcomes, hence the 7 to 10-year timeline for changes in the Alberta model. We do not think annual
revisions of the Rubrics are appropriate, as they could be disruptive and make it difficult to measure progress over time. Thus, we recommend the board ensure the Rubrics it adopts are holistic and includes a combination of quantitative and qualitative key indicators, even if implementation is phased in as some of those indicators are being developed.

California has the chance to continue leading the nation and chart a course that integrates the ESSA requirements into a holistic, innovative approach to assess our schools and promote continuous improvement. The Board has the time to build on its good work to date and adopt key indicators that include both qualitative and quantitative measures--the type of innovative approach envisioned when the state decided to move away from the API and designed the LCFF and the LCAP. For these reasons, we believe you should delay adoption of the key indicators recommended and not adopt an annual process to update those indicators. Instead, we believe you should consider the early indicators that research supports as being the most promising -- such as data in the California School Climate, Health and Learning Survey; data about access to career readiness skills and courses; and implementation of state standards--and direct staff to develop an approach for your consideration at the July meeting that incorporates these elements within the new accountability system.

We appreciate your consideration of our feedback and remain available to answer any questions or lend any assistance to your efforts.

Sincerely,

Eric C. Heins, President
California Teachers Association

C: Karen Stapf-Walters, Executive Director, State Board of Education