

May 5, 2021

Linda Darling-Hammond, President and  
Members of the State Board of Education  
State Board of Education  
1430 N Street  
Sacramento, CA 95814  
Via email: [SBE@cde.ca.gov](mailto:SBE@cde.ca.gov)

Re: Item #4: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System

Dear President Darling-Hammond and Members of the State Board of Education:

We respectfully submit this letter on behalf of the Curriculum and Instruction Steering Committee (CISC) of the California County Superintendents Educational Services Association (CCSESA). We value and appreciate the work of the California Department of Education (CDE) and State Board of Education (SBE) to design and implement an integrated local, state and federal accountability and continuous improvement system.

Student Growth Model and Communication

Tremendous work has gone into the development and refinement of the student growth model. We would like to express deep gratitude for the relentless pursuit and unwavering perseverance to find, create, test, and validate a growth model as part of the promise for meaningful accountability tools.

As we begin to think about how this model will be implemented and communicated, there are concerns regarding the level of complexity of the model and challenges around ensuring that it is understood by parents, community members, and other stakeholders. County Offices of Education will be tasked with providing technical assistance and support around this model as well as integrating it into our differentiated assistance support process. In anticipation of this, we offer the following recommendations:

1. Before rolling out a communications plan, provide clarity describing what the student growth model actually measures and communicates, and what it does not.
  - It must be clear that this is **not** a new set of data nor the incorporation of a new instrument to measure student learning. No other indicators or measures of student learning were incorporated in this measure. It is based solely on the same standardized assessments.
  - It is a different way to cut and analyze the same California Assessment of Student Performance and Progress (CAASPP) standardized test data which we already report two other ways at the aggregate level (percentage of students scoring at each of the four achievement levels and average distance above or below standard).

- Provide a simple one sentence definition to explain what a score of 42.1 or 126.8 means. What does it quantify in terms of aggregate student growth? What question does it answer?
  - Provide a simple and valid explanation of how this type of analysis supports our understanding of the data.
2. Be forward thinking in identifying and considering ways that misunderstanding of the model could lead to misuse and potentially undo progress we have made to develop meaningful multiple measures for internal and external accountability.
  3. Develop guidance related to the practical application and use of the results so that we ensure that it positively impacts students. Make clear connections to instruction and how it can be used to guide instruction in a Multi Tiered System of Support.

#### Ineffective and Out-of-Field Teachers

We have significant concerns about the current definition of Out of Field Teacher, which includes those on local assignment options, and the disproportionate impact it could have for both rural schools as well as county office operated alternative education programs. According to education code, alternative education teachers are not required to be credentialed in all of the content areas they teach. As currently defined, the Out of Field Teacher would label a vast majority of our teachers as misassigned. This has broad implications including the notification of misalignment to parents and a negative perception of our programs by stakeholders. As we strive to provide high-quality alternative education programs, increase rigor and program accountability, this perception negates that effort in every way.

Thank you for your leadership and support for California's public schools and students. We appreciate your consideration of our comments and look forward to our continued partnership.

Sincerely,



Jennifer Hicks, Assistant Superintendent Educational Services, Placer County Office of Education  
Chair, CISC

Cc:

Brooks Allen, Executive Director, SBE  
Sara Pietrowski, Policy Consultant, SBE  
Stephanie Gregson, Chief Deputy Superintendent of Public Instruction, California Department of Education (CDE)  
Rachael Maves, Deputy Superintendent of Public Instruction, CDE