



July 7, 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

Subject: SBE Agenda Item #5: School Accountability Report Card: Approval of the Template for the 2020–2021 School Accountability Report Card.

Dear State Board of Education,

I am the chairperson-elect for the Student Programs and Services Steering Committee (SPSSC) under the California County Superintendents' Educational Services Association (CCSESA). In this role, I represent county-operated student programs, including but not limited to regional special education programs, alternative education programs, juvenile court schools, and independent study programs. County-operated programs serve some of California's most vulnerable K-12 students in unique educational settings. This letter requests your support with reconsidering the issue of the current definition of Teacher Equity under California's Consolidated State Plan Under ESSA.

In May, our committee submitted a letter for the board's consideration outlining the potential issues that would arise from identifying teachers assigned through the Local Assignment Option (LAO) as "out-of-field." We are disappointed to see that this identification would remain and therefore need to reiterate the disproportionate effect this will have on alternative education programs offered through our County Offices of Education.

The identification of LAO teachers as "out-of-field" is inconsistent with the intention of Education Code 44865 specifically provides for LAO for juvenile, court, and community schools. This takes into consideration that these teachers provide instruction in a certificated position and are legally authorized to do so by statute. Further, this identification is misleading to the public since it presents an inaccurate picture of alternative education schools staffed by underqualified educators. The more accurate picture is that our County Offices use the LAO to staff some of the most hard-to-fill positions in education with fully credentialed educators who teach in self-contained, multiple-subject classrooms.. There is no viable remedy offered for this identification short of providing a fiscally unsustainable number of staff, or requiring staff to go back out and get multiple credentials.

This definition harkens back to the era of No Child Left Behind, which sought to shame and punish districts into school improvement. This identification will lead to similar results with finding our schools being harder to staff and in a consistent public relations struggle to defend our programs rather than celebrating our unique position in a continuum of service for students for whom traditional K12 educational models are not sufficient.

We therefore ask that the board reconsider this decision and support our students, staff, teachers, and schools by supporting the LAO for our teachers as within field and necessary to ensure the provision high-quality educational options for all students.

Thank you,

A handwritten signature in black ink, appearing to read "Micah Studer", with a long horizontal flourish extending to the right.

Micah Studer, Ed. D., Chair-Elect

Student Programs and Services Steering Committee

California County Superintendents Educational Services Association