

September 2, 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

Re: Item #4: New Targets for State Performance Indicators in the Annual Performance Report for Part B of the Individuals with Disabilities Education Act of 2004, covering program years 2020-21 through 2025-26.

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

We respectfully submit this letter on behalf of the Student Programs and Services Steering Committee (SPSSC) of the California County Superintendents Educational Services Association (CCSESA).

We appreciate the opportunity to provide input on the new targets for the performance indicators for the next six-year State Performance Plan and the efforts of the CDE to align accountability and continuous improvement efforts for students with disabilities across the requirements of IDEA and LCFF as much as possible.

We support the ongoing efforts to consult and partner with educators, parents, families, school and district administrators, policy advisors, school psychologists, Family Empowerment Centers, early education, advocacy groups, and state advisory board members. CDE has provided ample opportunities for stakeholders to help inform the development of a new set of rigorous state targets for the next six-year State performance Plan cycle.

The new targets are attainable, set appropriate expectations, and have captured much of the stakeholder feedback.

Area of Consideration

SPSSC members are concerned that the new Targets for Indicator 5a (the percentage of students aged five who are enrolled in kindergarten and aged six to twenty-two with disabilities served inside the regular class 80 percent or more of the day) will be difficult to attain even with the most ambitious plans and integrated technical assistance.

Indicator 5	2020	2021	2022	2023	2024	2025
5a Target	58%	60%	62%	64%	67%	70%

The new 5a Target range begins with 58% in 2020 and aims for 70% in 2025. For reference, between 2013 and 2019, the percentage of students who met this target fluctuated between 53.3% and 58.3%. While stakeholders believe more ambitious targets would encourage better placement and earlier interventions for students with disabilities, 12% percent growth over six years may be unattainable.

LEAs will need assistance to reach this Target. The CDE may want to examine the technical help provided to support LEAs to improve policies and practices in this area.

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 a continued partnership.

Sincerely,

Susan Connolly

Susan J. Connolly
Assistant Superintendent Student Services, Placer County Office of Education
Chair, SPSSC