



California County Superintendents Educational Services Association

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March 3, 2022

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 #04: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: 2020–21 Data Release, 2022 Accountability Considerations, Continuing Development Work for Future California School Dashboards, California’s Dashboard Alternative School Status Program, and the 2021–2022 Addendum Template for the Elementary and Secondary Education Act Consolidated State Plan.

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).

SPSSC represents county-operated student programs, including but not limited to alternative education programs, regional special education programs, and juvenile court schools. These programs qualify for Dashboard Alternative School Status (DASS). DASS schools represent about 10 percent of the total number of schools in California (1,044 out of approximately 10,000 comprehensive schools). DASS students represent about 2.5 percent of the total number of students in California schools. There are 151,000 DASS students out of 6 million total students.

County-operated programs serve some of California's most vulnerable and transient students in alternative education settings that require unique measures to effectively evaluate student progress. SPSSC members rely heavily on the CA Dashboard to transparently demonstrate and communicate appropriate student outcomes in a meaningful way to all educational partners.

Graduation Rate and Academic Achievement in DASS Schools:

Communicating outcomes for students in alternative settings is challenging, primarily due to the high transiency rate of the student population. Four and five-year graduation rate calculations assume that students enter our schools in their freshman year and continue with their cohort. That is not the reality of most students in alternative settings.

The DASS graduation rate is a powerful metric that enables alternative schools to communicate student outcomes.

The one-year graduation rate was developed for DASS schools to ensure the graduation outcomes of students in alternative educational settings are measured appropriately. Because of this rate, any DASS school student in eleventh or twelfth grade may qualify as a graduate if they receive a diploma, pass the California High School Proficiency Exam, earn a High School Equivalency Certificate, or earn a Certificate of Completion. In addition, the student would need to be enrolled at the DASS school for at least 90 consecutive days (with no gaps in enrollment over 30 days) OR graduate in July, August, or September OR be a graduate enrolled for at least 30 days and be a Foster Youth, Homeless Youth, or 11th grader.

Our DASS school students typically enroll in alternative settings after the 9th grade and remain enrolled for one year or less. One-year graduation rate calculations are critical in our ability to effectively communicate students' progress to students, parents, and the community in a tangible and relevant way. Including these most vulnerable students in the DASS graduation rate calculations is an accurate and fair representation of how LEAs (Local Education Agencies) and schools perform.

In an effort to provide a clearer picture of which DASS schools need the most assistance, the CDE proposed and implemented modified cut-points and growth measures for DASS schools. SPSSC supports the revised academic indicator cut scores for "Low" and "Very Low" because we believe they more fairly evaluate students' academic progress in alternative settings.

If modified methods are not applied for the 2022 Dashboard, an over-identification of DASS schools for Comprehensive Support and Improvement will likely occur.

Areas of Consideration:

In a letter dated January 12, 2022, the U.S. Department of Education denied the SBE-approved amended ESSA State Plan and the use of modified methods for DASS schools. In response, the CDE is seeking a waiver to maintain the current DASS system, including the use of modified methodologies for the Graduation Rate and Academic Achievement Indicators.

The California Dashboard is effective and has an enormous positive impact on students, families, and staff. Maintaining the modified methodologies for DASS schools is critical to ensure high-quality, measurable data to inform continuous improvement and support equitable outcomes for our most vulnerable students.

SPSSC strongly supports the SBE and CDE's commitment to maintaining the integrity of DASS. SPSSC also supports the CDE's recommendation to pursue a waiver of ESSA statute to allow California to maintain DASS modified methodologies and keep the current DASS system in place.

Thank you,

A handwritten signature in black ink that reads "Susan J. Connolly". The signature is written in a cursive style with a large, stylized "S" and "C".

Susan Connolly

Assistant Superintendent – Student Services

Placer County Office of Education

Chair, SPSSC

Cc:

Brooks Allen, Executive Director, SBE

Sara Pietrowski, Policy Consultant, SBE

Mary Nicely, Chief Deputy Superintendent, CDE

Cindy Kazanis, Director, CDE