



September 9, 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 #03: Update on the Dashboard Alternative School Status Request for a Waiver Pursuant to Section 8401 of the Elementary and Secondary Education Act of 1965

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

In the spirit of service and partnership, we respectfully submit this letter on behalf of the County Operated Student Programs Committee (formerly known as SPSSC) of the California County Superintendents Educational Services Association (CCSESA). In light of the recent decision by the U.S. Department of Education to deny California's waiver request, we are writing to implore you to maintain the original intention of the Dashboard Alternative School Status in California's Accountability System as we prepare for the return of the Dashboard in 2022 and beyond.

The CCSESA County Operated Student Programs Committee 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). County operated DASS programs serve some of California's most vulnerable and transient students in alternative education settings. Many of our DASS students enter alternative schools after the 9th grade with significant graduation requirement deficiencies and unfinished learning. Careful consideration and a deep understanding of alternative school programs must be used to evaluate DASS student progress in California's Accountability System effectively. Comparing DASS student outcomes to non-DASS student outcomes is invalid, inappropriate, and will not effectively support the improvement of student outcomes. In the following sections, we provide more context as to who our DASS students are and why the previously adopted modified methods for calculating DASS student progress were essential for making systemic changes that would support improvement for our DASS students. Also, our committee members have collaborated closely with the CDE and through the Alternative Schools Taskforce since the DASS Dashboard design discussions began in 2017. Please see the *attachment* to this letter for a comprehensive review and analysis of the development of the DASS modified methods from 2016 to the present.

Why is the Dashboard Alternative School Status So Important?

California's System of Support is grounded in the principles of continuous improvement. County offices have engaged districts in Level 1 and 2 support applying the principles of Improvement Science to assist LEAs in the close examination of meaningful, reliable data to identify areas in need of improvement and to apply change ideas that result in measurable gains that truly target



the areas most important for students to experience success in school and beyond. COEs rely on the Dashboard to provide relevant data to support this process. The Dashboard Alternative School Status has enabled alternative school programs to use actionable and relevant data to apply this process effectively. More importantly, students, parents, and educators can access reliable and meaningful data regarding their school and district/COE. This is critical to DASS schools and their educational partners and must continue.

Who Are California's Dashboard Alternative School Status Students?

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. As mentioned above, many of our DASS students enter alternative schools after the 9th grade with significant graduation requirement deficiencies and unfinished learning. Students in county-operated DASS schools are typically incarcerated, expelled, and/or probation referred. They face substantial barriers to accessing education including experiencing food insecurity, lack of stable and secure housing, significant credit deficiency, and challenges related to maintaining mental wellness. Many DASS students have also experienced ongoing adverse childhood experiences (ACES), which often lead to social-emotional and behavioral concerns and the reactivation of trauma in the school setting and community. Researchers have identified significant disproportionality in the racial and socio-economic status of California's DASS students when compared to non-DASS students. Therefore, alternative methods of measuring progress for students in DASS schools result in students, families, and educators having meaningful and actionable outcome data.

Meaningful Outcomes for 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 for most students in alternative settings. The DASS graduation rate is a powerful metric that enables alternative schools to communicate student outcomes.

As a reminder, 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 effectively



communicating 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. It provides clear and appropriate growth measures for DASS schools to inform instructional practices and professional learning plans.

We are concerned that the U.S. Department of Education's denial of California's waiver request will result in the over-identification of DASS schools for Comprehensive Support and Improvement and result in an endless cycle of improvement efforts that cannot reasonably succeed due to the use of inappropriate metrics that are irrelevant at best and damaging at worst.

* * *

The Dashboard is effective and has an enormous positive impact on students, families, and staff. Maintaining the ability to measure the progress of DASS students in an authentic manner is critical to ensure that DASS school leaders, students, and parents have access to high-quality, meaningful data to inform continuous improvement and support equitable outcomes for DASS students. We must find a way to continue to display modified measures on the Dashboard, not only for the reasons stated above, but also to support effective LCAP development and to ensure meaningful communication with our educational partners.

On behalf of California's 58 County Superintendents, the County Operated Student Programs Committee appreciates the SBE's and CDE's unwavering commitment to maintaining the integrity of DASS programs in California's Accountability System. Publishing valid and reliable data on DASS student progress on the Dashboard is and has been a significant priority of our members. We are here in service and partnership and hope to have continued collaborative conversations with the CDE as we all work toward the common goal of doing what is best for each of California's students served. Should you have any questions or comments, please do not hesitate to contact Derick Lennox, Senior Director, Governmental Relations and Legal Affairs, CCSESA (dlennox@ccsesa.org); Susan Connolly, Assistant Superintendent of Student Services, Placer County Office of Education (sconnolly@placercoe.org); or Gabrielle Marchini, Director of Curriculum, Instruction, Accountability, El Dorado County Office of Education (gmarchini@edcoe.org).

Sincerely,

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Cc: Brooks Allen, Executive Director, State Board of Education
Tony Thurmond, State Superintendent of Public Instruction, CDE
Mary Nicely, Chief Deputy Superintendent, CDE
Cindy Kazanis, Director, CDE
Kimberly Mundhenk, Administrator, CDE
Sara Pietrowski, Policy Director, SBE
Amy Tang-Paterno, Director, CDE
Joseph Saenz, Federal Policy Liason, CDE

**Attachment: Comprehensive Review and Analysis of the Development of the DASS
Modified Methods, CCSESA, County Operated Student Programs Committee (3 pages)**



Attachment: Comprehensive Review and Analysis of the Development of the DASS Modified Methods, CCSESA, County Operated Student Programs Committee

Prior to 2016, California used an accountability model for alternative schools called the “ASAM model.” A report by the LAO in 2015 concluded that this system was ineffective. This came about at the same time that California was redesigning its entire accountability model (ultimately, this led to the California Dashboard Model).

Beginning in 2017, a group called the California Advisory Task Force on Alternative Schools led efforts to examine accountability models for alternative schools. The Task Force had been a project of the John W. Gardner Center for Youth and their Communities at Stanford University and operated in collaboration with the CDE. Our committee, (SPSSC) had several members on this task force over the years. Dr. Jorge Ruiz de Velasco, the lead researcher of the project, provided this explanation of the purpose, “A central Task Force objective is to provide independent advice to the CDE and the State Board of Education (SBE) as they develop an accountability system and performance data dashboard for alternative schools, known as the Dashboard Alternative School Status (DASS). The Task Force also aims to build system knowledge and consensus among policymakers, practitioners, and equity advocates about state and local accountability levers that would best incentivize instructional innovation and improve outcomes for students in alternative schools.”

Between May 24, 2017 and January 24, 2020, the Task Force, or smaller Task Force workgroups, convened on 17 occasions for full-day meetings to consider different metrics and calculation rules for inclusion to the emerging DASS.

Specific recommendations came from the group around multiple accountability issues including the Academic Indicator (performance in ELA and Mathematics) and the Graduation Rate.

In 2018-19, CDE identified more than 1,000 public alternative schools of choice and charter schools (serving more than 355,695 K-12 students) that served high-risk students (DASS schools). DASS schools were required to have at least 70% of the school’s enrollment being composed of high-risk student groups including expelled/suspended students, wards of the court, habitually truant students, credit deficient, students with gaps in enrollment, a high level of transiency, foster youth, or homeless youth. Of the 355,695 K-12 students enrolled in alternative schools in 2018, about 6% were secondary students in grades 6-12.

The workgroup was focused on ensuring that the DASS accountability measures adhered to the same state indicators as those on the regular Dashboard (based on State Priorities). This was accomplished and is still in place - some of the DASS measures vary slightly in terms of parameters around the data to more accurately reflect alternative school characteristics.

Academic Indicator and DASS Schools:



On the 2018 California Dashboard, 93% of DASS schools with reportable ELA results and 96% with reportable math results performed at the “Low” or “Very Low” performance levels using the cut-points for all schools adopted by the SBE. This leads to the following question:

How can this be considered as “meaningful differentiation among schools” so that CDE can meaningfully support improvement (provide targeted assistance) as required by ESSA?

The DASS schools are all grouped together at the bottom of the performance categories which makes differentiation among them highly unlikely.

After examining this result on the 2018 Dashboard, CDE proposed and implemented modified cut-points and growth measures for DASS schools which resulted in a clear picture of which schools needed the most assistance.

Graduation Rate and DASS Schools:

ESSA requires that there be a 4-year adjusted cohort graduation rate measure included as part of the accountability system. In California, for traditional high schools, this is calculated by measuring the number of students who: 1) enroll as 9th graders 2) continue through high school, and 3) graduate within four or five years of that initial 9th-grade enrollment date. If a student moves to another school in that timeframe, the school where the student moves is held accountable for the student graduating within 4-5 years of that first date of 9th-grade enrollment.

A majority of students who enroll in DASS schools are credit-deficient and some of the most at-risk in terms of graduation. By holding DASS schools to the 4-5-year graduation rate, it is nearly impossible to see progress in the graduation rate from year to year. The students are at-risk (which is why they are enrolling in the school) and highly mobile. A current data point provided by DataQuest illustrates this mobility well. The new metric available for review is called the Stability Rate. The data generated through the Stability Rate report indicates the percentage of students who are continuously enrolled (a minimum of 245 consecutive calendar days) at the same school. Looking through this data, it is common to see county-operated (DASS) schools with a stability rate close to zero. Alternative Schools (frequently DASS schools as well) generate a 45% stability rate. The state average in California is 92.3%. If one thinks about examining a 4-5-year graduation rate in a school where there are, at most, 45% of students who attend at least 245 days (a DASS school) and then one uses the same criteria to examine a school with a 92% stability rate, the possibility of a DASS school ever being able to demonstrate growth is slim to none.

In 2018, due to the challenges for DASS schools with highly mobile students, the one-year graduation rate was developed. With this rate, a student who qualifies as a graduate would 1) Be in grade 11 or 12 2) Receive a diploma, pass the CHSPE, pass the GED (or similar), receive an adult ed diploma, or 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 in excess of 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.



The one-year graduation rate provides a more reasonable measure to determine the success of a DASS school by allowing for the reality that students are placed there due to characteristics that traditionally present barriers toward earning a diploma—this is why the DASS schools exist. To eliminate this measure is to eliminate a more realistic picture of a DASS school's success in supporting students to graduate.