



California County Superintendents Educational Services Association

Promoting, influencing, and advocating for high-quality education.

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 #02: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Eligibility Criteria for Differentiated Assistance, Connecting the Dashboard to the Teacher Assignment Data and Science Test Results, California School Dashboard Principles, and Information on the English Learner Student Group for the Academic Indicators

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:

We respectfully submit this letter on behalf of the Curriculum and Instruction Steering Committee (CISC) of the California County Superintendents Educational Services Association (CCSESA) to provide our support and requests related to California's Accountability System on the topics that will be discussed during Items #02 and #03.

Item #02: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Eligibility Criteria for Differentiated Assistance, Connecting the Dashboard to the Teacher Assignment Data and Science Test Results, California School Dashboard Principles, and Information on the English Learner Student Group for the Academic Indicators

We support the CDE's three recommendations for board action found on page 2 of Item #02. We believe that each of the three recommendations will support California's return to accountability in a transparent and meaningful way that will inform our LEAs' continuous improvement journeys.

As county offices, we find the Dashboard to be one of the most helpful tools in assisting our LEAs in identifying areas in need of improvement. As such, we have greatly valued opportunities to engage with the CDE to provide recommendations so that the data reported in the Dashboard provides the most accurate picture of student performance. As newly collected data are incorporated into the Dashboard, we are committed to collaborating with the CDE to ensure that these data are included in relevant ways that protect the validity and reliability of the Dashboard. For example, we have greatly appreciated the opportunity to participate in the Ad-Hoc Priority 1 Teacher Assignment Data Workgroup and look forward to continued discussions to collectively develop objective criteria and recommend the inclusion methodology of these criteria for the board's consideration in the coming months. Additionally, we have been following the SBE's discussion regarding the definition of the English Learner student group for the Academic Indicator. From the practitioner's perspective, we believe that including English Learners who have been reclassified for four years or less provides a holistic picture of an LEA's entire EL program- from initial designation through successful reclassification. Through the improvement coaching we facilitate with districts we continuously



observe that improvement work takes time and even though a student may be reclassified- or if a district is no longer eligible for differentiated assistance support- the work needs to continue. Therefore, including ELs for the four years after they are reclassified helps LEAs evaluate the effectiveness of their EL program to ensure that when reclassified, every English Learner will continuously demonstrate the knowledge and skills needed to succeed through graduation and beyond. We respectfully request that the CDE and SBE continue to provide ample opportunities for LEA input before changes are made to the Dashboard.

As California's schools emerge from two years of disruption caused by the COVID-19 pandemic, county offices are stepping up to meet the needs of support from our students and local educational agencies. In tracking our local data, we anticipate that more LEAs than ever will become eligible for Differentiated Assistance, many for the first time. We appreciated the concern that was raised during the August 2022 California Practitioners Advisory Group Meeting about the capacity for county offices to provide the required support necessary to LEAs if/when the need for support increases dramatically. Our county office colleagues have already begun to unpack their local data to identify where support and capacity building are going to be needed. We are deeply engaged in the work of the Statewide System of Support and look forward to continuing to be a part of the work of developing more coherence, communication, and alignment among districts, schools, county offices, and community and state agency partners. An example of increased coherence and communication is the CDE's Dashboard Communications Toolkit. We would like to thank the CDE for developing this valuable guidance for the field. We request additional resources be added to explain the identification criteria for Differentiated Assistance for the 2022-23 school year once this methodology is approved. Please do not hesitate to let us know how we might be able to partner and support this work.

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

We were very disappointed with the U.S. Department of Education's decision to deny California's waiver request to maintain Dashboard Alternative School Status (DASS) modified methods business rules for calculating the Academic Achievement and Graduation Rate Indicators.

Alternative educational settings serve our students who have been expelled, incarcerated, are on probation, are habitually truant, behaviorally challenged, and/or are severely credit deficient. As such, learning environments, wrap-around services, and social and emotional support are thoughtfully designed to address the unique needs of our DASS school students. California's alternative accountability system for our DASS schools reflected this thoughtful and intentional design and provided a valid depiction of DASS school student performance. We believe that the modified methods have fairly evaluated the more than 1,000 alternative schools that serve some of California's most vulnerable students. We are concerned that simply changing or removing the modified methods will portray an inaccurate picture of our DASS school students' outcomes as well as result in an overidentification of DASS schools for Comprehensive Support and Improvement. We are very appreciative of the CDE's short-term and long-term options to mitigate these concerns and are eager to learn more about each of these options as well as work alongside all of you to solve this new and unexpected problem. For these reasons, we implore you to maintain the spirit of the Dashboard Alternative School Status in California's Accountability System as we prepare for the return of the Dashboard in 2022 and beyond.



California County Superintendents Educational Services Association

Promoting, influencing, and advocating for high-quality education.

* * *

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); Jennie Snyder, Chair, Curriculum Instruction Steering Committee, Deputy Superintendent, Sonoma County Office of Education (jsnyder@scoe.org).

Sincerely,

Jennie Snyder

Jennie Snyder
Jennie Snyder, Ed.D.
CISC Chair, CCSESA
Deputy Superintendent, Educational Support Services
Sonoma County Office of Education

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