



CCSESA

California County Superintendents Educational Services Association

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April 10, 2015

Senator Lamar Alexander

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Senate HELP Committee

455 Dirksen Senate Office Building

Washington, D.C. 20510

Senator Patty Murray

Ranking Member

Senate HELP Committee

154 Russell Senate Office Building

Washington, D.C. 20510

Dear Senators Alexander and Murray:

On behalf of the California County Superintendents Educational Services Association (CCSESA), a statewide association representing all California county superintendents of schools, I am writing to express our enthusiastic support for reauthorization of the Elementary and Secondary Education Act (ESEA) and to provide comments on the Every Child Achieves Act of 2015. CCSESA applauds the Senate HELP Committee's efforts to construct a bi-partisan bill that incorporates flexibility and local control, and urges the Senate to continue to work collaboratively to achieve much-needed comprehensive reforms.

CCSESA supports the adoption of state-developed accountability systems.

California is engaged in a comprehensive restructuring of its school accountability system, developing multiple measures of achievement based on eight state priorities. It is critically important that federal and state accountability systems are aligned, and that federal legislation allows for measures that reflect the priorities established in a state's accountability system.

CCSESA believes that decisions regarding school intervention are best left to state and local education agencies (LEAs).

While we agree that struggling schools should have access to additional supports, we reject the notion of a one-size-fits-all approach to intervention. LEAs should have the flexibility to tailor intervention methods to address the specific needs of a struggling school. Thus, we strongly support the Senate's plan to limit federal mandates that dictate intervention steps and methods.

CCSESA strongly opposes “portability” which would remove local discretion over the Title I funds. As the oversight agency closest to the school level and most familiar with the characteristics of the local student population, LEAs must maintain the flexibility to distribute funds to schools with the highest needs and fewest resources. We greatly appreciate the response to our concerns regarding “portability” and praise the Senate HELP Committee’s decision to strike this language from the bill.

CCSESA strongly supports the elimination of the AYP. Given the incredible diversity among states, we believe that each state should be allowed to adopt metrics to identify low-performing schools in need of additional assistance. Furthermore, we know that requiring states to identify and penalize a minimum number of low-performing schools is neither advantageous to student and staff morale, nor has it shown to be effective in increasing student achievement.

CCSESA opposes federal testing mandates that would conflict with state assessments. California is currently in the process of implementing an innovative computer-based state assessment that aligns with the state’s challenging new academic standards. While we support the use of assessments for the purpose of measuring student progress, we would oppose a federal mandate that requires states to administer tests in a manner inconsistent with their accountability model.

CCSESA supports the Senate’s plan to incorporate inclusive accountability measures. As educators of high-need and at-risk pupils, we believe that a limited list of permissible accountability measures cannot accurately quantify the accomplishments of our unique student populations. We applaud the Senate’s plan to allow additional measures of performance in order to provide parents and stakeholders with a well-rounded and more accurate understanding of a school’s strengths and weaknesses.

CCSESA is concerned about the Senate’s plan to retain the 1% cap on alternative assessments. We believe that students with moderate to severe cognitive disabilities should have access to appropriate assessments that measure their academic growth and that students’ participation in such assessments should not be limited by an arbitrary cap. We ask that the Senate reconsider whether placing a hard cap on alternative assessments is appropriate.

CCSESA supports amendments to the “supplement/supplant” rule. As currently written, these compliance regulations are overly burdensome and may prevent the effective use of Title I funds. CCSESA would support amendments that help to alleviate the administrative burdens associated with this rule.

CCSESA strongly supports full funding authorization for Title I Part A. CCSESA believes the Senate must prioritize formula-funded programs that are consistent with the original intent and purpose of ESEA – to meet the education needs of low-achieving children in the Nation’s highest poverty schools – before funding competitive grant programs.



CCSESA urges the Senate to reconsider aspects of the formulas that lead to disparate outcomes in funding. Every year, California educates more than 6 million students, nearly 60% of which are from low-income households. However, California receives significantly less Title I funds per pupil than other similarly situated states. CCSESA asks the Senate to reevaluate the rationale behind the Title I formulas and to adopt a more equitable funding scheme.

Thank you for your bipartisan leadership in working to reauthorize this critically important legislation. If you have any questions regarding our comments or would like additional input, please do not hesitate to contact me directly.

Sincerely,

Peter Birdsall
Executive Director

cc: Senator Barbara Boxer
Senator Diane Feinstein