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March 6, 2015

**TO:** Dr. Michael Kirst, President of State Board of Education  
Members, State Board of Education  
Tom Torlakson, State Superintendent of Public Instruction

**FROM:** Sara Bachez, Legislative Advocate  
Association of California School Administrators (ACSA)

**RE:** State Board of Education Agenda Items – March 11-12, 2015

ACSA appreciates the opportunity to provide comments and recommendations on a number of agenda items before the board this month. If you should have any questions regarding our positions please feel to contact me at [sbachez@acsa.org](mailto:sbachez@acsa.org) or 916-329-3811.

**SBE Agenda Item #6 – Developing a New Accountability System**

**Support Multiple Measures.** ACSA fully supports the California Department of Education (CDE) recommendation that the State Board of Education (SBE) approve the PSAA Advisory Committee report and recommendations on options for moving the state accountability system from using a single index to multiple measures to parallel the state priorities and, options for an alternative point scale, and appropriate timing for the release of the next accountability reporting cycle.

**Support the Suspension of the API for an additional year.** ACSA also supports the department's recommendation to suspend the Academic Performance Index (API) for the 2014-15 school year. We recommend the full release of all Smarter Balanced Assessment Consortium (SBAC) data for local purposes this year.

**Release of the Next Accountability Report & Timeframe for Planning.** ACSA encourages the board to establish a realistic timeframe of when the state will implement a new state accountability system. The PSAA Advisory Committee approved the Technical Design Group's recommendation that the earliest a new state accountability report will be available will be fall of 2016. Given all the changes Local Education Agencies (LEAs) are experiencing, it is critical that the state develop a new accountability system with genuine and thoughtful input and consideration of all education stakeholders.

**Evaluation Rubrics.** ACSA would like to commend the hard work of West Ed's staff, the State Board and the Department of Education staff, as they continue to convene stakeholder meetings and review input and feedback from LEAs, educational organizations, social justice groups, and parents and public members. We appreciate their strong commitment to ensuring that the state adopts a holistic, multidimensional assessment tool to assist school districts, charter schools, and County Offices of Education (COEs) in meeting their eight statewide priorities.

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ACSA participated in the discussion regarding the first concept paper of the evaluation rubrics at the January stakeholder meeting. As we review the March draft of the evaluation rubrics, we would like to emphasize that the state avoid creating duplication of reporting requirements. One of the goals the state should consider undertaking is discussions to reduce and streamline the bureaucracy of multiple reporting requirements. We would like to stress the importance of developing an evaluation tool that is supportive and instructive in the progress of meeting the state’s priorities described in subdivision (c) of Section 52060 of the Education Code. In addition, we would like to note that the Local Control Funding Formula is not fully implemented and will not be fully funded until 2020-21, therefore, the expectations of meeting most, if not all, state priorities by the time the evaluation rubrics are in effect will not be realistic.

Understanding that the evaluation rubrics draft is still in concept form, we would like to pose the following questions for clarification and/or request further discussion.

### **Overall Evaluation Rubrics**

- The purpose of the evaluation rubrics is still unclear. The draft indicates that the rubrics is meant to be used to assist local educational agencies and those providing technical assistance to LEAs, however, ACSA is concerned that the data analysis reads similar to a compliance-based audit. We would like to encourage that the evaluation rubrics be informative and provide assistance on how LEAs can improve their strategies to meet their eight state priorities.
- Is the evaluation rubric a tool that measures state and local priorities, as well as locally determined goals that are detailed in LEAs strategic planning reports, improvement-oriented plans, LCAPs, and Annual Updates? Throughout the document the word “plan(s)” is mentioned to be used to evaluate for districts’ strengths and areas in need of improvement based on outcomes and results for ALL students. It is important that there be consistency as to what plans will be evaluated and reviewed as part of the rubrics process to ensure uniformity and consistency.
- Is the purpose of the evaluation rubrics to help inform school districts on their performance and progress of meeting the eight state priorities as detailed on their LCAPs, and to take into consideration locally developed goals, as well? We are concerned that as currently drafted, COEs will interpret the evaluation rubrics differently, which can create confusion and different results in diagnosing school districts’ performance and need for technical assistance.

### **Data Analysis (Page 7-9)**

- The rubrics should only require LEAs to report on significant subgroup data defined by the Education Code.
- The rubrics should allow LEAs the ability to apply the category “Metric Does Not Apply” to metrics such as Advanced Placement Passage, Early Assessment Program, high school drop-out and graduation rate for all years that the information is not applicable, and/or if these categories do not apply to elementary school districts.

- Provide the Education Code definition for each of the metrics using a hover or pop-up box, in addition to a glossary, to ensure standardization of the information being submitted for each metric.
- Under the Basic “Adequate Facilities” metric, consider labeling this metric as locally determined as some districts and LEAs can use the facilities inspection tool (FIT) scores to address this item, but not all.
- What is the rationale for displaying information for 2011-12 and 2012-13? The information during that time period was not linked to any of the state priorities because the LCFF was not implemented until the 2013-14 budget year. We recommend the baseline year be the first year of the LCFF implementation (2013-14).
- Under the Status bar, there are 4 color bars, and it appears that one option (the Metric Does Not Apply) is missing.
- What is the definition of Progressive Improvement? Is that defined in statute? If not, what is the process and timing to discuss and develop?

#### **Outcome Analysis (Page 10-11)**

- What is the definition of reference points? Are reference points an interchangeable term with statewide priorities and locally determined priorities and goals?
- We are optimistic that the outcome analysis could be a useful tool to guide discussion after an LEA reviews its data analysis, however, there are concerns that this information can be used in a punitive manner instead of a tool to diagnose and develop corrective strategies on areas of improvement.
- Establishing state and local standards. At this time, we are unable to provide feedback as we are still reviewing subdivision (c) of 52064.5 of the Education Code to understand the intent of the law. We are interested in direction and discussion that the members of the State Board will provide to staff on how to begin the development of the standards.

#### **Practice Analysis (Page 12-14)**

- We commend the development of this section, as it provides an opportunity for reflection on the practice of utilizing data to assess student outcomes, the identification of goals focused on improving student outcomes with attention to the needs of student subgroups (as defined in statute) that are based on research and evidence, and recognizes the need for plans to identify realistic expectations to achieve desired outcomes. We are still evaluating the categories of developing, emerging, and sustaining. But in general, we support the concept of four solid guiding questions that focus on meeting desired goals to improve achievement outcomes for all our students.

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- This section indicates that this tool could be used to inform an LEA or school site strategic plan, such as the LCAP or Annual Update. We would recommend that the entire evaluation rubrics document maintain consistency on which plans it intends to assess to avoid confusion for our practitioners, those reviewing the rubrics, and for the public. For example, in this section adding a footnote to the word “plan” in Questions 2, 3, and 4 could help describe that this word means all plans upon which LEAs report information tied to the eight state priorities and locally determined priorities.

Thank you for the opportunity to provide you with our initial reaction to the draft concept of the evaluation rubrics. We are committed to ensuring that LEAs have access to resources and tools that will provide assistance and support to begin closing the achievement gap for all of our students.