

November 3, 2017

Dr. Michael Kirst, President  
California State Board of Education  
1430 N Street, Suite 5111  
Sacramento, CA 95814

Via email only ([sbe@cde.ca.gov](mailto:sbe@cde.ca.gov)) Re:

*Item 3: Accountability and Continuous Improvement System*

Dear President Kirst:

Item 3 of this month's Board agenda continues the progress the Board and its partners have made in building the state accountability system, while revealing the great complexity of issues before us and the need to continuously evolve and improve the dashboard and other parts of that system. We at Children Now stand ready to be thought partners as the Board continues to design key elements of the new system and build out those components already under way.

In that spirit, and as a result of our review the latest proposed developments to the California School Dashboard, we offer below an array of suggestions that we urge the Board to consider and act on as it deliberates the next steps to evolve this mechanism for incorporating multiple measures meaningfully and effectively within a comprehensive school and district accountability system.

**Issue 1. The Proposed Changes to the Academic Indicator**

The Board is being asked to make major changes to a core component of the state's accountability system at the last minute, only weeks away from the release of the 2017-18 Dashboard. Moving in this expedited fashion leaves little room for public input, and significant opportunity to make mistakes. We strongly urge the Board to slow down and deeply consider the significant policy changes that the Board is being asked to make.

**1.a. Process concerns – Technical Design Group completely lacking in transparency; no meaningful public input into a major Board action.** The proposed changes in the academic indicator accountability measure are significant; yet, they are being brought to the Board at the last minute and were made behind closed doors, without any public input. The Board is set to release the 2017 California Dashboard later this month, and would need to at least partially delay that release to even consider alternatives (or substantial modifications) to the one being considered as per the Board agenda. Making such major changes to the academic indicator at the last minute leaves little to no room for the Board to meaningfully consider and incorporate public input to the process.

The recommendation of these changes is being made by the Technical Design Group (TDG). The mode of operation employed by TDG at this point is deeply troubling. At present, the members of the TDG

are not publicly known; TDG members are prohibited from talking with stakeholders about the work that the group is doing; and the entire deliberation is inaccessible to the public. This lack of transparency is the complete antithesis of the open and collaborative process that the State is recommending that districts use in the LCFF process. *We urge the Board to reconsider how the TDG operates.* At a minimum: (1) the membership of the group should be known; even if meetings are going to be held in a non-public manner, (2) the dates of meetings and the topics that the group is going to discuss should be public knowledge, and (3) there should be a method to at least provide members of the public to submit written materials to the members of the TDG for their consideration; and (4) the Board’s consideration of TDG recommendations should be scheduled in a manner that allows for the realistic possibility of substantive alternatives being considered.

**1.b. Changes to Academic Indicator “Status” and “Change” standards reasonable.** The TDG proposes changing the cut scores for both the “Status” (rows) and the “Change” columns in the 5 x 5 matrix. These changes seem reasonable. For the Status, the adjustment is made to the math indicator by adjusting the cut point between the “High” and “Medium” status. Basically, under the newly proposed standards, a district would need to have its average student score at least at Level 3 in order to attain the “High” performance level; this improves on the current version, wherein a school could have an average performance level as much as 5 scale points below level 3 and still be considered “High”. Since the Board has identified within the state’s ESSA plan “maintaining” the “High” performance level as the state’s goal, it makes sense for the goal to be at least the average student scoring at Level 3, which is the State’s definition of proficiency for the test.

We also consider the modifications to the “Change” standards to be appropriate. As you can see in the charts below, the proposal makes two adjustments. First, it centers the “Maintained” change column on zero change, plus or minus 3 scale points; by contrast, in the current version, the “Maintained” column is skewed to the positive. Since “maintained” generally means to stay the same, these changes make sense. The proposal also standardizes what it means to increase or decline significantly to be a 15 scale-point gain or decline. This standardization and centering, seen below, also seems appropriate.

**English Language Arts**

	Declined significantly	Declined	Maintained	Increased	Increase Significantly
Current	-15 or more	-15 to -1	-1 to +7	+7 to +20	+20 or more
Proposed	-15 or more	-15 to -3	-3 to +3	+3 to +15	+15 or more

**Math**

	Declined significantly	Declined	Maintained	Increased	Increase Significantly
Current	-10 or more	-10 to -1	-1 to +5	+5 to +15	+15 or more
Proposed	-15 or more	-15 to -3	-3 to +3	+3 to +15	+15 or more

**1.c. Proposed changes to the color coding of the 5 x 5 accountability matrix is dramatic and constitutes a questionable shift in foundation of the new accountability system.** The TDG proposes to redefine 8 of the 25 cells in the 5 x 5 performance/change accountability matrix, as illustrated in Figure 1. In 6 of these 8 instances, a district’s average student score could decline and yet be upgraded from the color rating it would assigned in the current matrix. These proposed changes raise two fundamental questions: (1) Why would these proposed changes make sense for this indicator and not the other ones (what is the theory of change)? and (2) Why isn’t there a need to signal schools/districts that are declining significantly with a change in color ratings?

**Figure 1. Proposal Would Change the Color Rating of 8 Cells in the 5 x 5 Color Matrix**

(Change in color from current color rating to proposed color rating)

	Decline Significantly	Declined	Maintained	Increased	Increased Significantly
Very High	Yellow to Green				
High	Orange to Green	Yellow to Green			
Medium	Orange to Yellow	Orange to Yellow			
Low	Red to Orange		Yellow to Orange		
Very Low					Yellow to Orange

**1.d. If a district is “Declining Significantly”, there should be an accountability signal that tells that some additional attention is needed for this indicator.** If a district, school or subgroup is declining significantly, we believe that the accountability system should signal that such a large amount of decline is occurring and should encourage local reflection, analysis, and response. As such, Children Now has concern with the Proposal to change the color coding for the “Declined Significantly” column in the accountability 5 x 5 matrix (as highlighted in Figure 1, above). The proposed changes diminish the role that “Change” plays in the rating system, and we think that is headed in the wrong policy direction. A key factor in understanding the implications of this policy shift is understanding what it means to have an average student in a district to Decline Significantly – or, what does it mean to have a 15 scale score point fall in performance on the Smarter Balanced test. Since dealing with scale scores is something new for many of us, it is somewhat challenging to answer the question of how significant is 15 scale point, or basically, how “significant” is it to “Decline Significantly”. Attachment 1 attempts to shed light on what 15 scale points means. From our perspective, **a 15 point drop in the average scale score is significant -- often constituting one half of one grade level in performance** – and the state’s accountability system should signal such a change by changing the color in the school rating system. At the same time, we believe that there should be some protection for smaller schools, subgroups or districts, so that we are certain that the significant decline is indeed a meaningful and significant decline and not just a reflection of random variation. (See recommendation below).

**1.d. Standardization of the Color 5 x 5 Matrix Across Indicators Makes Sense.** Up until this point in time, the color ratings for the various state indicators have been generally the same.<sup>1</sup> We believe that standardizing the 5 x 5 color matrix across indicators is good policy in that it suggests a consistent level of concern and urgency associated with a specific level of performance and change. The color coding is a signal to school leaders and the public about whether there is a need for urgency (Red) or concern (Orange) about the performance for a specific sub-group, school or district, or whether performance is going well (Green) or very well (Blue). Having some standardization helps both with the basic ability to explain to the public and educators what is happening and what is being signaled, and in identifying areas that need attention.

***Alternative Recommendation – Apply the “Safety Net Methodology” to the Academic Indicator to protect small schools, subgroups and districts.*** Recall that at its September meeting, the Board took action to create a revised accountability matrix for smaller schools for the other state indicators of graduation rates and suspension rates. If a school has fewer than 150 students for a specific indicator, then the 5 x 5 accountability matrix would be compressed to a 3 x 5 matrix, with the “Declined Significantly” and “Increased Significantly” columns being shifted inward. The rationale for this policy change was that smaller group sizes might create unnecessary volatility in the indicator that could result in smaller schools, districts and subgroups ending up in these ‘significant change’ columns. However, the Board decided to not apply this Safety Net Methodology to the Academic Indicator. We recommend that the Board reconsider this policy decision, and apply the Safety Net Methodology to the Academic Indicator as an alternative to redefining the color coding in the matrix.

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<sup>1</sup> There are only two deviations in the color ratings across indicators. The first is for graduation rates because the entire “Very Low” performance row is rated Red to align with the federal requirements that all schools with graduation rates less than 66 percent receive support. The second deviation is for the academic indicator where the “Maintained” “Low” performing cell is Yellow, whereas that cell is Orange for all the other indicators. Children Now and its equity partners have on numerous occasions raised concerns with this difference because of its policy implications. Namely, this sends the signal that maintained low performance is acceptable. Given that the low performance level can be up to 3 grade levels behind, we believe that maintaining such low performance shouldn’t be given a pass in terms of needing to address it in an LCAP by labeling it Yellow instead of Orange.

**Table 1: Proposed Three-by-Five Grid for Small Student Populations for Suspension Rates**

		Change				
Level		Increased Significantly	Increased	Maintained	Declined	Declined Significantly
Status	Very Low	Gray	Green	Blue	Blue	Blue
	Low	Gray	Yellow	Green	Green	Blue
	Medium	Orange	Orange	Yellow	Green	Green
	High	Red	Orange	Orange	Yellow	Yellow
	Very High	Red	Red	Red	Orange	Yellow

**Alternative Recommendation** – Increase the scale score point change amount beyond 15 for the Declined or Increase Significantly if these amounts aren’t “significant” enough. If the Board believes that a change of 15 scale score points isn’t significant enough to merit attention in terms of changing the color rating for the Academic Indicator, then perhaps the Board should consider increasing the scale score change for the “Declined Significantly” and “Increased Significantly” columns so that it is large enough to merit acknowledgement that there should be a change in the color rating for the indicator.

**Issue 2. Chronic Absenteeism Rate Data Reporting**

Data on chronic absenteeism has been collected by the state for the first time for the 2016-17 school year, and is now available to report. The staff is proposing that instead of putting this data in the California Dashboard, that the dashboard would provide a link to the Data Quest data tool, from which interested parties can then access the chronic absenteeism data.

We recommend that the Board not pursue this direction, and **instead include the chronic absenteeism data in the dashboard**. Since only one year of data is available at this point, the state is not yet in a position to set standards for the indicator. At the same time, we believe that educators, parents, and stakeholders will be very interested in seeing this new data in the dashboard. The Board has a precedent of providing the data in dashboard for other indicators when it wasn’t ready to set standards: it has done this for 11<sup>th</sup> grade assessment results and other components of the College and Career Readiness indicator. We recommend that the Board take a similar approach and provide the chronic absenteeism data in this fall’s dashboard.

### **Issue 3. Student, Parent and Teacher Surveys – Make them annual, standardize a limited number of questions, and report results at the school and subgroup level.**

The School Conditions and Climate Working Group (CCWG) has been working for the last year to improve the measurement and tools that are available to inform schools and districts about their culture and climate. We believe that a student feeling safe and connected to their school is a prerequisite for their being able to learn and thrive. Having annual check-ins on the conditions and climate can be a powerful tool in identifying and continuously addressing and school climate issues so that they don't impede a student's education, and instead fully support the learning process. The current approach, and even the approach proposed by the CCWG, doesn't go far enough. We believe that the Board should move forward on this issue, and are willing to work with the Board and staff to improve the measures in this area. We recommend the Board take the following steps.

- ***Move to annual surveys of students, teachers and parents.*** Surveys are a relatively cheap reform tool that can support major improvements at a school. But it is not just the thoughts of students that matter; it is important that teachers and parents also be engaged. Education doesn't happen without well supported and engaged teachers. Knowing how a school's staff feels about key issues can improve teacher satisfaction and engagement, improve retention, and improve the quality of instruction. Given the growing teacher shortage, ensuring a good school climate can only help meet educator and student needs. Similarly, the opinions of parents matters, which is one of the reasons that parental involvement and engagement is a state priority.
- ***Request funding for districts in next spring's budget discussions to support surveys.*** While surveys are a relatively cheap reform, they do take some resources and staff time. We will be encouraging the Legislature to provide resources to support expansion of surveys, and encourage the Board to work with the Administration on this.
- ***Standardize some questions, and allow for local flexibility.*** Schools and districts should have some flexibility in which surveys they use, but there should be a limited number of questions regarding climate, safety and connectedness that are standardized statewide. Thus, we encourage the Board to support flexibility in which surveys to use, but develop a core set of standard questions that would need to be included in all surveys.
- ***Provide tools to support districts' analysis and use of survey results to make changes.*** As impactful as quality survey results can be, districts may need support to be able to fully leverage the results from an assessment and the tracking of results over time. The state should begin to invest in additional tools to fill this need.
- ***Use surveys to support work on other state priorities.*** As recognized by the CCWG, surveys can be a tool to support the other state priority areas, especially those for which the system currently has very limited information. In developing parameters for what needs to be included in this survey tool, the state should provide better information to address how other state indicators should be incorporated into an appropriate survey.
- ***Over time, develop a state indicator incorporating survey results.*** We believe that the results from the limited number of standardized survey questions regarding climate, safety and connectedness can be compared across schools and support improvements in school climate. Thus, we believe that the Board should eventually pursue adding a state indicator that usefully captures survey results.

#### **Issue 4. Broad Course Access – Measure at the School and Subgroup Level**

We are encouraged that the Board is beginning to consider the impact that access to a board course of study can have on student's opportunities. Children Now has submitted a separate coalition letter on this issue, and encourages the Board to consider a much more comprehensive approach to measuring broad course access, including examining school and subgroup level information, as well as district data, and considering approaches to measure access at the elementary level. Achievement gaps start early, and lack of access to STEM, arts, PE and other material at the elementary level creates the foundation for a well-balanced quality education. We look forward to working with the Board and staff as progress is made on support broad course access.

As always, please do not hesitate to contact me if I may be assistance in further illuminating any of the points described in this letter, or in assisting the board in addressing any matters related to the development of the dashboard or other accountability issues.

Sincerely,



Samantha Tran  
Senior Managing Director, Education

#### Attachments

cc: Members, California State Board of Education  
Karen Stapf Walters, Executive Director, California State Board of Education  
Judy Cias, Chief Counsel, California State Board of Education  
David Sapp, Deputy Policy Director and Assistant Legal Counsel, California State Board of Education  
Glen Price, Chief Deputy Superintendents of Public Instruction, California Department of Education  
Debra Brown, Director, Governmental Affairs Division, California Department of Education

## Attachment 1. What Does a 15 Scale Point Decline Mean?, and Is It “Significant”? – The Answer is Yes

The Smarter Balanced assessment is designed with something called an underlying “vertical scale” that allows for performance to be compared across grade levels in a meaningful way. This is a critical property of an assessment that supports states designing student growth models that measure an individual students’ growth from one year to the next. California is working to consider a student growth model for inclusion in the fall 2018 dashboard. The Smarter Balance vertical scale places student performance on a scale ranging from 2000 to 3000 scale points with scale scores with each individual grade ranging over somewhere around a 400 point range from the lowest possible point total for a grade, although this varies by grade.

One way to get your head around the meaning of 15 scale points is to look at the scale score that defines performance for Level 3 on the test, which in general terms is meeting standards or on grade level performance. As Figure 1 shows, the average scale score increases around 30 points per grade level. So, one way to view a 15 scale score point change is that it is roughly a half of a grade level’s performance. It would be a higher proportion for the middle school grades and a lower proportion for the elementary school grades.

**Figure 1. Scale Scores for Level 3 and How they Change Across Grades**

Grade	Math		English Language Arts	
	Grade level Performance - (Level 3 Scale Score)	Scale Point Change between Grades	Grade level Performance - (Level 3 Scale Score)	Scale Point Change between Grades
3	2436		2432	
4	2485	49	2473	41
5	2528	43	2502	29
6	2552	24	2531	29
7	2567	15	2552	21
8	2586	19	2567	15
<b>Average Change</b>		<b>30</b>		<b>27</b>

A second way to consider what a 15 scale point shift would mean is to consider the distribution of the academic indicator for districts. Figure 2 shows the current “distance from level 3” score range by deciles for the English Language Arts exam. A district in the 10<sup>th</sup> percentile in the state was 58 points below level 3, while a district at the 90<sup>th</sup> percentile would score at the 41 points above level 3. How much a 15 scale point decline would result in a school falling in the performance distribution for the state would depend on the starting point for the district.

**Figure 2. LEA Performance on the Smarter Balanced English Language Arts (Performance – Distance from Level 3 by Deciles)**

	10 <sup>th</sup> %	20 <sup>th</sup> %	30 <sup>th</sup> %	40 <sup>th</sup> %	50 <sup>th</sup> %	60 <sup>th</sup> %	70 <sup>th</sup> %	80 <sup>th</sup> %	90 <sup>th</sup> %
Distance from Level 3	-58.2	-45.7	-35.1	-25.3	-16.6	-6.7	5.2	19.7	41.3

If for example, a district in the prior year performed at the level of the state median for district -16.6 scale score points below level 3, and then fell 15 scale score points, that school would fall from the 50<sup>th</sup> percentile district to the 34<sup>th</sup> percentile in the state. So, in terms of the old accountability system, a 15

scale score point decline might be the equivalent of falling 2 decile ratings in the API. That would be considered a significant decline.