

January 9, 2015

Mike 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: SBE January 2015 Agenda Item #4 – Evaluation Rubrics*

Dear President Kirst:

We represent a coalition of civil rights, advocacy, community, parent, student and other organizations who have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF). LCFF creates a historic opportunity to focus resources on helping California's neediest students overcome the barriers they face in closing the achievement gap and graduating college and career ready. It also promises a new level of transparency and local engagement for parents, students, and community members in the design of their local schools. As you know, in an effort to give life to these objectives, we have commented jointly multiple times over the last year regarding the State Board of Education's LCFF regulatory proposals.

With these comments, we wish to convey to the State Board a set of design requirements and animating principles that we believe should guide development of the evaluation rubrics required under LCFF. We hope that the Board and the individuals responsible for developing the rubrics fully employ this recommended architecture and incorporate these recommended design principles so that the rubrics can serve their intended purpose of driving continuous improvement while closing the achievement gaps experienced by our neediest students.

Overarching Architecture for Design of Rubrics:

- **Measure Statewide Performance Outcomes:** The rubrics should ultimately measure *performance outcomes* in the eight state priority areas and do so *relative to statewide standards based on the metrics required by statute*.<sup>1</sup> The rubrics should not serve merely to assess the ability of local LEAs to meet locally established performance targets on locally-developed goals or only the quality of the LCAP itself. Anything less than uniform statewide standards would undercut, if not irreparably impair, meaningful accountability for ensuring equality of educational opportunity, improving student outcomes and closing the achievement gap for all students.
- **Establish Uniform Statewide Standards for Both “Performance” and “Expectation for Improvement”:** The State Board is responsible for establishing for use in the evaluation rubrics two types of standards in each of the eight state priority areas: “standards for school district and individual schoolsite *performance*” and standards for district and schoolsite “*expectation for improvement*.” *Cal. Educ. Code Sec. 52064.5(c)* (emphases added). The rubrics should thus define meaningful minimum “performance” standards that define baseline acceptable and unacceptable performance for districts in the eight state priority areas and along the statutorily required metrics. For these same priority areas and statutory metrics, the Board also needs to establish “expectation for improvement” standards. Doing so will promote continuous improvement among the great majority of districts that meet the minimum expectations but still

---

<sup>1</sup> *Cal. Educ. Code § 52064.5(c)*.

have room for continued growth. These two sets of standards are also necessary to fulfill LCFF's requirement that districts merely in need of improvement be identified for technical assistance from county offices of education and/or the California Collaborative on Educational Excellence and that unacceptably performing districts in greater need be identified for assistance and, ultimately, if necessary, directive intervention from the State Superintendent.<sup>2</sup>

- **Maintain an Equity Focus on Closing Achievement Gaps:** Performance for all student subgroups should be reviewed and measured, and the equitable educational outcomes behind LCFF should be maintained in the design of the rubrics. Accordingly, the rubrics should ensure that performance targets and improvement targets include an element focused on closing achievement gaps. Differing levels of expectation for improvement should be set for the unduplicated student groups and other numerically significant student subgroups to produce a closing of the achievement gap.
- **Link to the LCAP When Targets Not Met:** The rubrics should include a clear linkage to the underlying LCAP that is triggered when LEAs do not meet performance or improvement targets. As such, the LCAP should both be utilized to assist with the assessment of why the LEA is not performing at an optimal level and to articulate the LEA's plan for improving its outcomes (which should then be reflected in a revised LCAP or annual update).
- **Trigger Action in a Timely Manner with Clarity of Who Is Responsible for Action:** When performance issues are identified, the rubrics should ensure a prompt, clear protocol of response that identifies which entity (LEA, COE, Collaborative, SPI, or other body) is available or required to act and what level of support, assistance or intervention is appropriate by when.
- **Integrate the Revised API with the Evaluation Rubrics:** To ensure California will have in place a single coherent system of support, assistance, and intervention, a new multiple-measures API based on college and career readiness should be adopted this year and, as required by the LCFF statute,<sup>3</sup> integrated with the evaluation rubrics. Give the rubrics' inclusion of performance and improvement standards, it is essential to ensure alignment between the rubrics and new API so that they are mutually reinforcing, rather than distinct, and potentially conflicting, approaches.

### Critical Design Principles

- **Linked to Best Practices and Focused on Improving Actual Practices:** The rubrics should measure against or point toward recognized best practices and professional standards, with an emphasis on understanding and improving actual practices within the LEA in service of the eight state priorities and any locally identified priorities (including around parent, student and stakeholder engagement broadly speaking). The best practices should be specific and research-based and should include specific best practices related to educating unduplicated pupils and other numerically significant student subgroups who are not meeting district targets. The SBE and/or Collaborative should develop resources that can support improved practice and be linked to or embedded in the rubrics, with resources specific to each state priority area and for addressing outcomes for specific student subgroups, as appropriate.
- **Supportive of Student, Parent, and Stakeholder Engagement:** Consistent with the LCFF design principle of "engagement," the rubrics should require and facilitate public engagement in

---

<sup>2</sup> Cal. Educ. Code § 52074.

<sup>3</sup> Cal. Educ. Code §§ 52064.5(b); 52060(d)(4)(B).

the evaluation and reflection process, rather than being something that is effectuated solely between LEA staff internally and state actors externally.

- **Comprehensive, Yet Accessible:** Taken as a whole, the rubrics should provide a “holistic, multidimensional assessment of school district and individual schoolsite performance and [should] include all of the state priorities.”<sup>4</sup> At the same time, to facilitate accessibility for parents, students, and stakeholders, each rubric should be relatively short and objective, and, where appropriate, may support narrative descriptors. Numerous check boxes and jargon should be avoided. This balance can be achieved if the rubrics provide both a top-level snapshot and the ability to review more detailed information supporting the top-level indicators, if desired.
- **Transparent:** The process for employing rubrics and the evaluation process, as well as the results of any self-assessment or external evaluation (*e.g.*, by a COE or technical assistance provider), should be publicly available and readily accessible to the public, including in languages other than English.
- **Inquiry-Prompting:** To promote effective reflection and continuous improvement, the rubrics should facilitate discussions about why outcomes have or have not been met for all students and for specific subgroups or schools, and why the LEA has made specific choices in its program and/or LCAP approach.

\* \* \*

Thank you for the opportunity to comment. We look forward to continue working with the State Board of Education to realize the full promise of LCFF.

Sincerely,

John Affeldt  
*Managing Attorney and Education Program Director*  
**Public Advocates Inc.**

Khydeeja Alam Javid  
*Manager of Governmental Relations*  
**Advancement Project**

Marvin Andrade  
*Director of Leadership Development*  
**Asian Americans Advancing Justice | Los Angeles**

Edgar Campos  
*Director of Organizing and Policy*  
**Californians for Justice**

Oscar E. Cruz  
*President & CEO*  
**Families In Schools**

---

<sup>4</sup> *Cal. Educ. Code* § 52064.5(b).

Annie Fox  
*Education Policy Lead*  
**PICO California**

Melia Franklin  
*Executive Director*  
**Bay Area Parent Leadership Action Network (PLAN)**

Jan Gustafson-Corea  
*Chief Executive Office*  
**California Association for Bilingual Education**

Helen L. Hutchison  
*President*  
**League of Women Voters of California**

Akua C. Jackson  
*Executive Director*  
**Youth Together**

Jonathan Klein  
*Executive Director*  
**GO Public Schools Leadership Center**

Bill Lucia  
*President and CEO*  
**EdVoice**

Brian Lee, J.D.  
*State Director*  
**Fight Crime: Invest in Kids California**

Luis Santana  
*Executive Director*  
**Reading and Beyond**

David Sapp  
*Director of Education Advocacy*  
**ACLU of California**

Gloria Scoggins  
*President*  
**The BlackBoard of West Contra Costa**

Travis Silva  
*Equal Justice Works Emerson Fellow*  
**Lawyers' Committee for Civil Rights of the San Francisco Bay Area**

Araceli Simeon-Luna  
*Project Director*  
**Parent Organization Network**

Ryan J. Smith  
*Executive Director*  
**The Education Trust-West**

Shelly Spiegel-Coleman  
*Executive Director*  
**Californians Together**

David Valladolid  
*President and CEO*  
**Parent Institute for Quality Education (PIQE)**

Debra Watkins  
*President and Executive Director*  
**California Alliance of African American Educators (CAAAE)**

Jackie Thu-Huong Wong, MSW  
*Director, FosterEd: California*  
**National Center for Youth Law**

Matt Yagyagan  
*Education Policy Advocate*  
**Alliance San Diego**

Arturo Ybarra  
*Executive Director*  
**Watts/Century Latino Organization**

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  
Brooks Allen, Deputy Policy Director and Assistant Legal Counsel, California State Board of Education  
Christine Swenson, Director of Improvement and Accountability, California Department of Education  
Nick Schweizer, Department of Finance  
Cathy McBride, Governor's Office  
Jannelle Kubinec, Director of National, State and Special Projects, WestEd