

July 8, 2016

Dr. Michael W. Kirst, President
California State Board of Education

Tom Torlakson
State Superintendent of Public Instruction
California Department of Education

Via Email Only (sbe@cde.ca.gov)

RE: State Board of Education Board Agenda Item #02 (Developing a New Accountability System: Update on the Local Control Funding Formula)

Gentlemen:

We are writing as members of the Promoting Authentic College, Career, and Civic Readiness Assessment Systems (PACCCRAS) Working Group to offer suggestions regarding the current and future design of California's assessment and continuous improvement system. PACCCRAS is a diverse group of thought leaders representing higher education, K-12 classroom teachers, administrators, and nonprofit leaders.

We want to commend the Governor, State Board of Education (Board), and the California Department of Education (CDE) for their vision and hard work in developing an approach to assessment and accountability that emphasizes the use of information for continuous improvement of K-12 instruction and student outcomes. Adoption of a "multiple measures" model could help guard against an over-emphasis on test scores for judging schools and districts.

It is clear that as we pursue new Common Core and Next Generation standards, and genuine college and career readiness, we must refine the assessments available in the state to capture higher order skills. We must develop and encourage students' abilities to apply their knowledge in solving problems, creating and defending ideas and solutions based on evidence, and addressing new situations with ingenuity and skill. We must also provide assessments that offer deeper diagnostic information to educators so that they can guide student learning successfully.

Since the fall of 2015, the PACCCRAS Working Group has met several times to review the direction of the state's new system, and offer the following central observations and related suggestions:

- **The state should explicitly signal to the field its commitment to refine and perfect the system over time.** In the spirit of continuous improvement, the state should provide clear and unequivocal signals to schools and districts that there are areas of necessary, future development in the assessments, measures of desired student outcomes, and accountability mechanisms.
- **The state should leverage local innovative practices to authentically capture higher order student skills.** Today, there are many schools and districts that are developing innovative and potentially scalable ways to measure the more complex and challenging skills that the Common Core and Next Generation standards demand. The state should embrace such innovations and develop processes at both the state and local levels to pursue that development.

Signaling to the field the state's commitment to refining and perfecting the system

California's new assessment and continuous improvement system is a step forward over previous systems that relied solely on test scores; however, there is much work and study left to do to develop the full range of measures needed. Measures that may take years to develop or refine should be added as they are perfected. We believe that this is the intent of the Board, and suggest that this be clearly stated in Board policy including timelines for adding and/or revising measures in the coming years. In particular, we urge the Board to avoid settling for weaker measures because they are currently available and then sticking with those measures for the sake of measuring trends.

There are several areas where the system needs to be bolstered to paint a fuller picture of student performance and growth and of the conditions that contribute to their improvement. Some of these are additional measures of student academic outcomes while others reflect refinements of state priorities. We discuss several of these additional areas below.

- **Career-Technical Education (CTE):** As many in the state would agree, current measures of CTE opportunities and outcomes need refinement. This may be one area in which local initiative and flexibility may be most fruitful; ultimately, the Board needs to leverage expertise across the state to decide how completion of CTE pathways should be evaluated comparably across the state for rigor including how students are recognized for participation in pathways that combine CTE with college preparatory coursework.
- **College and Career Readiness:** As a new graduation policy is considered in the state, it will be important to develop and assess coursework and assessment strategies designed to support the development of college and career skills. The state should investigate how schools and districts are identifying college and career ready competencies, developing learning opportunities, and creating performance assessments to evaluate the needed knowledge and skills. Attention should be given to how the state can encourage districts to prepare as many students as possible for both college and careers, rather than reverting to old patterns of preparing some students for college and other students for work. Such investigation can inform the state as it considers approaches that will enable students to be well prepared for their futures.
- **Post-Secondary and Workforce Participation:** It is important to align K-12 outcomes to student persistence and performance in higher education by creating a method to follow students into higher education institutions. Similarly, it would be useful to be able to follow students as they enter the workforce, either directly from high school or after completion of higher education. Several states have systems that address both higher education and workforce participation, and it would seem worthwhile for California to explore moving in this direction. Only by seeing what happens to our students once they leave the K-12 system can we evaluate how well we are doing in actually preparing them for college and careers or identify what other measures might be supportive of these goals.
- **Early K-2 Assessments:** The current assessment system has a large gap prior to grade 2. Districts are encouraged to use formative assessments and/or the digital library to bridge this gap, but it is unclear if they have enough resources to do this effectively. Not attending to this gap to ensure that there are strong locally based diagnostic tools for literacy and mathematics risks students falling so far behind that they have little chance to catch up by the end of third grade.

- **Science and Social Science Assessments:** New assessments for science and history/social science/civics will be forthcoming in the next several years based on the State Superintendent's recommendations to the Legislature in March 2016. These assessments should emphasize locally-based performance and project tasks rather than (or in addition to) short-form summative questions. As with the preschool–grade 2 gap, many districts will need considerable assistance in selecting and/or designing authentic assessments in these areas. There also may be value in the state validating assessments so that local results can be aggregated at the state level.
- **School climate/student engagement surveys and measures:** The Board has directed its staff to identify local school climate/student engagement surveys to identify specific indicators for inclusion into the LCFF evaluation rubrics design. Given the high level of local innovation in this arena where validity and reliability of metrics are still in question, careful study and a continuous improvement approach would be especially beneficial for testing out and refining those metrics over time. In addition, given the great variability in local capacity to create or evaluate available measures of school climate and student engagement, a statewide consortium in this area might be particularly helpful.

We support the movement towards designing performance assessments for science at statewide and local levels. With respect to early learning, history and social science/civics, for which appropriate formative or statewide assessments do not currently exist, leveraging local innovative practices may inform such development.

Leveraging local innovative practices to capture authentic and higher order student skills

In each of the areas noted above, we believe that allowing school and district innovations to drive measurement development supplemented by state guidance and support would result in higher quality metrics and tools. The necessity to revise these areas over time calls for adoption of a continuous improvement approach in which initial elements are updated, sharpened, and improved based on systematic feedback from the field and evidence of their impact.

This approach might suggest establishing working groups or leveraging existing state capacity or expertise and/or local consortia around these areas that would include school and district leaders along with researchers, non-profit organizations, state representatives, and other necessary individuals. With potential funding support from the state, the mandate of each group would be to investigate how existing local and state measures in a specific domain could evolve into more sophisticated indicators and identify a path for incorporating those measures into the state's system.

For example, one such working group might be focused on better defining and measuring college and career readiness; another focused on history/social science/civics assessment; and a third on refining measures of school climate and student engagement. Such consortia would reinforce the importance of a state-local partnership around assessment. They would also allow the state to involve large numbers of practicing teachers in the process of evaluating or developing assessments, a practice we know to be effective in producing teacher buy-in to assessment and accountability models. The state's investment in working groups and/or consortia would be larger on the front end, but once assessments were identified, developed and disseminated, the long term cost would drop significantly to the amount needed to provide routine guidance to districts and schools.

We at PACCCRAS are eager to partner and assist the Board and CDE in this important work. We would be happy to meet with whomever you might designate to continue this work.

Sincerely,
PACCCRAS Working Group

PACCCRAS STEERING COMMITTEE:



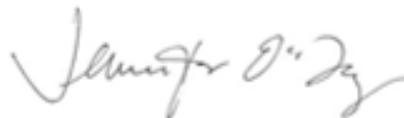
Linda Darling-Hammond
President & CEO, Learning Policy Institute



Chris Steinhauser
Superintendent,
Long Beach Unified School District
On behalf of Long Beach USD



Brad Stam
Vice President/COO
ConnectEd: The California Center for College
and Career



Jennifer O'Day
Chair
California Collaborative on District Reform



David W. Gordon
Sacramento County Superintendent of Schools
916.228.2410
dgordon@scoe.net



Mary L. Perry
Member,
California State PTA Board of Managers
On behalf of California State PTA



Carolina Cardenas
Director, Academic Outreach & Early Assessment
California State University Office of the
Chancellor



Don Daves-Rougeaux
CEO/Founder
Rougeaux, MSC

PACCCRAS MEMBERS:

Soung Bae

Senior Research and Policy Analyst, Stanford
Center for Opportunity Policy in Education
(SCOPE), **On behalf of SCOPE**

Bill Honig

Julie Kessler

Principal, San Francisco International High School



Bob Lenz

Executive Director
Buck Institute for Education
On behalf of Buck Institute



Monica H. Lin, Ph.D.

Associate Director of Undergraduate Admissions
University of California Office of the President

Akili Moses-Israel

California Director, NAF



Rosanna Mucetti, Ed.D.

Deputy Superintendent of Education Services,
San Leandro Unified School District



Raymond Pecheone

Professor of Practice, Stanford University
Executive Director, Stanford Center for
Assessment, Learning, and Equity (SCALE),
On behalf of SCALE



David N. Plank

Professor (Research)
Stanford University



David Rattray

President, UNITE-LA
Los Angeles Area Chamber of Commerce
On behalf of LA Chamber of Commerce



Ryan J. Smith

Executive Director, Ed Trust West
On behalf of Ed Trust West

David Stern

Professor of Education Emeritus, U.C. Berkeley
Co-founder, College & Career Academy Support
Network



Samantha Tran

Senior Managing Director, Education
Children Now
On behalf of Children Now



Gia Truong

Chief Executive Officer, Envision Education
On behalf of Envision



Elliot Washor, Ed.D.

Co-founder, Big Picture Learning
On behalf of Big Picture Learning

ORGANIZATIONAL ENDORSEMENTS:



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