California Department of Education

Executive Office

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# MEMORANDUM

**DATE:** February 7, 2022

**TO:** MEMBERS, California Practitioners Advisory Group

**FROM:** STAFF, California Department of Education

**SUBJECT:** Item 1: Information Item Related to California’s State and Federal Accountability System: The 2022 Accountability Work Plan and Future Considerations.

## Summary of Key Issues

For the past two school years, many state and federal accountability requirements were waived or adjusted due to the impact of the 2019 novel coronavirus disease (COVID-19) pandemic on local educational agencies (LEAs), schools, and students. During this time, the California Department of Education (CDE) published multiple reports to adhere to state law requiring the reporting of valid and reliable data. A summary of these reports is referenced on the COVID-19 Data and Reporting web page at <https://www.cde.ca.gov/ds/ad/coviddatareporting.asp> and the 2021 Data Release: Data Files and Record Layout web page at ~~https://www.cde.ca.gov/ta/ac/cm/datafiles2021.asp~~ [the preceding link is no longer available].

Beginning with the 2021–22 school year, state and federal accountability requirements will be restarted. This restart in accountability is the core topic that the CDE will present to the State Board of Education (SBE) at the March 2022 meeting as part of its annual accountability update (i.e., work plan). The update typically informs of any upcoming necessary changes to the state and local indicators and performance standards that are reported through the California School Dashboard (Dashboard) based on newly available data, recent research, and/or stakeholder feedback and work related to the state’s accountability system. Attachment 1 contains an overview of the work plan.

Because the CDE requests the California Practitioners Advisory Group (CPAG) members’ input on specific items in the work plan, the information within Attachment 1 is organized so that the items requiring feedback are presented first followed by the remaining work plan items for consideration. Specifically, the items for feedback are:

* The restart of reporting state indicators on the 2022 Dashboard and the use of Status only,
* The U.S. Department of Education’s (ED’s) rejection of the state’s use of the Dashboard Alternative School Status (DASS) as an alternative accountability system (Note: this topic will also be discussed during Item 2), and
* The review of the eligibility criteria for support for schools and LEAs.

Note that for 2022, the ED is allowing one-year and longer-term changes of certain accountability requirements through the “2021–22 Template for Addendum to the Every Student Succeeds Act Consolidated State Plan due to the COVID-19 National Emergency.” This Addendum will be discussed during Item 3 and will include the CDE’s request to the SBE to submit a waiver for the modified methods used in the Dashboard Alternative School Status (DASS) program. If the 2022 Dashboard work plan is adjusted based on action from ED, the CDE will follow up with the CPAG at future meetings as needed to prepare for the 2022 Dashboard release in December 2022.

## Attachments

Attachment 1: 2022 Accountability Work Plan (10 pages)

## 2022 Accountability Work Plan

### Items Requiring Feedback from the California Practitioners Advisory Group

#### Reporting of Status Only

Pursuant to Assembly Bill (AB) 130 (Chapter 44, Statutes of 2021), the CDE is restricted to only reporting performance data on the state (i.e., Status only) and local indicators using data from the 2021–22 school year for purposes of identifying local educational agencies (LEAs) for technical assistance or intervention (note: this is also referred to as eligibility for support). While the California School Dashboard (Dashboard) typically also reports Change (i.e., the difference from prior year data) and performance level colors, these data will not be reported on the Dashboard due to the restrictions imposed by AB 130.

With the reporting of Status only, the Dashboard will display, for each state indicator, five Status levels of performance (i.e., Very High, High, Medium, Low, and Very Low). These five levels are based on the cut scores that were set and approved by the State Board of Education (SBE) for each state indicator. The California Department of Education (CDE) engaged in a discussion with the Technical Design Group (TDG) on whether it would be appropriate to adjust the Status cut scores for the 2022 Dashboard. After a robust discussion, the TDG members did not support adjusting the cut scores and indicated that doing so in light of the pandemic may cause the system to lose credibility. The TDG members remained firm that cut points be changed as infrequently as possible.

#### Dashboard Alternative School Status Program

In October 2020, the CDE received a letter from the U.S. Department of Education (ED) that raised concerns about California’s use of Dashboard Alternative School Status (DASS) “modified” measures on the Academic Indicator and the Graduation Rate Indicator. The CDE developed these modifications, with feedback from the California Practitioners Advisory Group (CPAG) and other interest groups, to fairly evaluate the more than 1,000 alternative schools that mainly serve the state’s “at risk” or vulnerable populations. Without modified measures that directly address the needs of this unique population, DASS schools may be over-identified when compiling the list of schools eligible for support.

The modification made to the Academic Indicator is through the application of a different set of cut scores for measuring academic achievement. In September 2019, the SBE approved an adjustment to the cut scores for the Low and Very Low Status levels, thus increasing the number of DASS schools in the Low level and decreasing the number in the Very Low level.

The modification to the Graduation Rate Indicator is through the development of a one-year DASS graduation rate (approved by the SBE in November 2018) that is based on students in grade twelve. In this rate, students are counted as graduates if they earned a traditional high school diploma, received a high school equivalency certificate, passed the California High School Proficiency Exam, or earned a Special Education Certificate of Completion. Additionally, students must also meet specific enrollment requirements to be included in the denominator of this rate. Because most students who enroll at DASS schools are not on track to graduate within four years after entering grade nine, continued production of a modified graduation rate would fairly and appropriately evaluate a DASS school’s impact on their students.

In response to ED’s October 2020 letter, in January 2021, the SBE adopted amendments to the Every Student Succeeds Act (ESSA) State Plan, which included a description of the proposed modifications made to the Academic Indicator cut scores for DASS schools and the one-year graduation rate that was developed for DASS schools. In January 2022, the ED denied the proposed amendments to the consolidated State Plan. As a result, the next proposed step is to submit a waiver to the ED to request the continued use of an alternative accountability system for DASS schools, which will be discussed separately during Item 2 of the February 2022 CPAG meeting.

#### Eligibility for Support: Comprehensive Support and Improvement

States are required under the ESSA to determine which schools were eligible for Comprehensive Support and Improvement (CSI) based on the criteria in their State Plan. Such determinations typically must occur at least once every three years. ESSA also requires that states determine which schools are eligible for Targeted Support and Improvement (TSI), based on student group performance. Under California’s ESSA Plan, schools that are not eligible for CSI will be eligible for TSI regardless of their Title I funding status if they have one or more student groups(s) that, for two consecutive years, meet the criteria applied to determine at least the lowest performing 5 percent of Title I schools. The last time schools were identified for CSI and ATSI was based on data from the 2019 Dashboard.

Due to the COVID-19 pandemic, California received a federal accountability waiver of identification of schools in 2019 and 2020. As a result, schools designated as eligible for CSI and ATSI in 2018–19 remained in place through 2020–21 with the exception of those schools with a three-year school-wide average graduation rate at or above 68 percent for the 2017–18, 2018–19, and 2019–20 school years which exited the CSI – Low Graduation Rate Schools category. A current list of schools eligible for support is available on the ESSA Assistance Status Data Files webpage at <https://www.cde.ca.gov/sp/sw/t1/essaassistdatafiles.asp>.

The 2021 wavier from ED requires the state to determine eligibility for CSI and ATSI based on 2022 Dashboard results. Additionally, through the COVID-19 State Plan Addendum (Item 3) the CDE is considering a modification for both entry and exit criteria based on the 2022 Dashboard results. The CDE will work closely with the SBE, the ED, CPAG, and various stakeholders to determine the appropriated modifications for the entry and exit criteria.

#### Eligibility for Support: Differentiated Assistance

Under the LCFF, LEAs including districts, county offices of education (COEs), and charter schools are eligible for differentiated assistance (DA) based on their performance on the Dashboard. The last time LEAs were determined eligible for differentiated assistance was based on results from the 2019 Dashboard. Due to the COVID-19 pandemic, LEAs that were determined eligible based on the 2019 Dashboard have remained in DA due to the lack of state indicators on the 2020 and 2021 Dashboards.

AB 130 requires the restart of DA eligibility based on data from the 2022 Dashboard. Additionally, per AB 130, prior year Dashboard data (i.e., 2018, 2019, 2022) will be used to determine those LEAs eligible for level 3 support. Moving forward, the CDE will work closely the SBE and various educational partners to determine, if needed, modifications to the differentiated assistance criteria.

#### Remaining Work Plan Items for Consideration

##### State Indicators

In 2020 and 2021, California’s accountability system was put on pause in response to the federal waiver of accountability requirements and accompanying state law that provided relief from these requirements. As a result, the last reporting of state indicators was within the 2019 Dashboard where Status, Change, and performance level color results were displayed. In the absence of reporting state indicators on the 2020 and 2021 Dashboards, data related to the Graduation Rate Indicator and the College/Career Indicator (CCI) were reported through the CDE School Dashboard Additional Reports web page, which typically provides detailed data beyond what is reported on the Dashboard. As mentioned earlier, the CDE also published valid and reliable data that would have been reported on the Dashboard through DataQuest (such as the suspension rates and chronic absenteeism rates).

With the reporting of state indicators resuming with the 2022 Dashboard, the following identifies changes to the Academic Indicator and updated information for the CCI and ELPI. (No changes are anticipated for the Chronic Absenteeism Rate Indicator, the Graduation Rate Indicator, and the Suspension Rate Indicator.)

##### Academic Indicator

The Academic Indicator is based on student performance on the Smarter Balanced Summative Assessments and the California Alternate Assessments in English language arts/literacy (ELA) and mathematics. Both content areas are reported separately in the Dashboard using the data obtained from the testing vendor, Educational Testing Service. The results are calculated using two factors: (1) meeting the federal 95 percent participation rate target and (2) calculating the distance in student scale scores from Level 3 (Standard Met), which is also known as the Distance from Standard (DFS).

The 2022 reporting will apply the new ED participation rate penalty requirement to assign the Lowest Obtainable Scale Score (LOSS) to each student needed to bring the participate rate of each school, district, and student group up to 95 percent. Since this new methodology could result in LEAs and schools receiving a much lower Status level than in prior years, the CDE had begun notifying educational partners and LEAs on this new federal requirement. Over the next few months, the CDE will actively reach out to LEAs so that they can appropriately plan for the spring 2022 testing administration. For more information on this federal requirement, please refer to the participation rate flyer available on the CDE Dashboard Flyers web page at <https://www.cde.ca.gov/ta/ac/cm/dashboardflyers.asp>.

##### College/Career Indicator

The CCI is a high school indicator that reflects how many students graduate from high school prepared for college or a career. It includes a variety of college and career preparedness measures, such as course completion, college-level exams, and pre-apprenticeships. It was designed to encourage high schools to provide all students with a rigorous broad course of study that prepares them to leave high school with the ability to pursue college or a career.

At the end of the 2020–21 school year, the CDE collected (for the first time) data on four new measures: student internship, student-led enterprise, simulated work-based learning, and the Armed Services Vocational Aptitude Battery (ASVAB). Prior to making any recommendations to the SBE on these measures, the CDE will review the data with the CPAG and other interest groups to obtain feedback on the immediate inclusion of these measures for accountability given the continued challenges and disruptions schools have faced due to the COVID-19 health crisis.

As noted at the February 2021 CPAG meeting, the CDE has been working on the development of two new career measures for potential inclusion in the CCI: a civic engagement measure and an industry certification measure. In the past year, the CDE continued to meet virtually with the Civic Engagement Work Group to discuss placement criteria (i.e., Prepared and Approaching Prepared) proposals along with the data collection. During this time, the Analysis, Measure, and Accountability Reporting Division and the Career and College Transition Division also held conversations on the development of industry certifications as a potential measure for the CCI.

While the data collection for both the civic engagement measure and the industry certification measure were planned for the 2021–22 school year, this was suspended to allow the California Longitudinal Pupil Achievement Data System (CALPADS) to undergo a re-architecture of its infrastructure. This re-architecture has provided the CDE a unique opportunity to explore other modes of data collection. For instance, having a dedicated data collection for CCI career measures could help LEAs and the CDE better track and assess progress and outcomes of coursework, exams, and seals. Building a dedicated data collection could also allow the CDE to tighten the descriptions of the data being collected and ensuring that only essential data are being collected. The CDE will use this year to discuss the various data collection options, leveraging the architecture of CALPADS, and its resources, as well as meet with interest groups to discuss next steps for these two measures.

When the 2022 Dashboard is released this fall, the CDE proposes to not report the CCI on the Dashboard. Due to the flexibility given to LEAs to administer local assessments when the administration of the Smarter Balanced Assessments was not the most viable option, statewide results of the 2021 Smarter Balanced Assessments are not widely available to use for the CCI. Because the Smarter Balanced Assessments is both a standalone measure and a part of other compound measures in the CCI, determinations for Prepared, Approaching Prepared, and Not Prepared cannot be made and a CCI cannot be calculated. This proposal to not report on the CCI or use it to identify schools for support will be discussed during Item 3 of the CPAG February 2022 meeting.

##### English Learner Progress Indicator

The English Learner Progress Indicator (ELPI) measures the rate English Learner (EL) students are progressing towards English language proficiency. The ELPI is based on results from the English Language Proficiency Assessments for California (ELPAC) and at least two years of ELPAC Summative results are required to create Status. In 2019, the ELPI reported on Status using two years of ELPAC data. This data was also used to identify schools eligible for support under federal ESSA requirements.

Following the close of the administration of the 2022 ELPAC, the CDE will work closely with the ELPI Workgroup, who advises the CDE on this indicator, and the TDG in planning, developing, and reporting the ELPI Status for the 2022 Dashboard. The CDE will bring updates of this work to future CPAG meetings.

#### District of Special Education Accountability

With the release of the 2022 Dashboard, the CDE will apply the district of special education accountability (DSEA) rule to all available state indicators. Originally applied to the Academic Indicator since the release of the 2017 Dashboard, this rule “sends back” SWDs who receive special education services at another district or county office of education to the sending LEA (i.e., district of special education accountability). This ensures that the LEA that receives federal funding for a student—under the Individuals with Disabilities Education Act—will be held accountable for the outcomes of that student. (Note that this rule only applies to LEAs. Schools that serve SWDs are held accountable for all their SWDs, regardless if they were sent by another institution.)

In 2020, the DSEA rule was expanded (for the first time) to the graduation rates and the CCI data that were reported for informational purposes on the CDE School Dashboard Additional Reports web page. Beginning from 2022, the rule will be factored in for the first time to the Suspension Rate Indicator, the Chronic Absenteeism Indicator, and the English Learner Progress Indicator, and it will continue to be applied to the Academic Indicator, the Graduation Rate Indicator, and the CCI. For further details on this rule, please refer to the CDE Dashboard Flyers web page at <https://www.cde.ca.gov/ta/ac/cm/dashboardflyers.asp>.

#### Dashboard Alternative School Status Program: Additional Items

##### At the February 2021 CPAG meeting, the CDE shared with CPAG members on the ongoing work with the review of enrollment patterns and the positive transition rate for DASS schools. The following provides an update to these topics:

##### Enrollment Patterns: Due to SBE concerns that the modified one-year DASS graduation rate could potentially increase student transfers from non-alternative high schools into DASS high schools, since 2019, the CDE has annually provided analyses of the enrollment patterns and whether the patterns warranted any changes to the calculation of the one-year DASS graduation rate. To date, the trend data in student transfers remain relatively stable (except during the months immediately following the COVID-19 school closures). Although there is uncertainty as to whether California can continue the use of the one-year DASS graduation rate in the Dashboard, the CDE is committed to reviewing the enrollment patterns and providing this information to the SBE and will be reporting the next enrollment patterns for the 2020–21 school year in an April SBE Information Memorandum.

##### Positive Transition Rate: In November 2020, the Alternative Schools Task Force presented a report and recommendations to the SBE. One recommendation was to develop a positive transition rate that could be a new local indicator for DASS schools. Because the inclusion of a new local indicator on the Dashboard would require a change in current statute, an alternative option is for the CDE to report this data through the School Dashboard Additional Reports.

Regardless of the ED’s decision on the DASS, reporting this data for informational purposes within the School Dashboard Additional Reports may provide valuable insight in the efforts made by DASS schools to the state’s most vulnerable youth. It could also provide additional data that may not always be available for these schools on the Dashboard due to small *n-*sizes and the limits placed on reporting small numbers for student privacy reasons.

The CDE will continue to fine-tune the business rules used to calculate this rate by taking the feedback received from the CPAG at the February 2021 meeting, along with the input from the Alternative Schools Task Force and other stakeholders. The CDE will bring updates of this work to the CPAG at future meetings.

#### Local Indicators

The SBE adopted local indicators for those LCFF state priority areas where statewide data is not available. The SBE-adopted local indicators include performance standards for LEAs and self-reflection tools that LEAs use to report progress. LEAs are responsible for annually completing the local indicator self-reflection tools based on an assessment of locally collected data and input from educational partners, reporting progress to the local governing board or body of the LEA and uploading the results to the Dashboard. An LEA that meets the SBE-adopted performance standards will receive a status of Met in the Dashboard; an LEA that does not meet the SBE-adopted performance standards will receive a status of Not Met or Not Met for Two or More Years, as applicable.

The SBE adopted local indicators for the following state priorities:

* Basic Services and Conditions – Appropriately Assigned Teachers, Access to Curriculum-Aligned Instructional Materials, and Safe, Clean and Functional School Facilities (Priority 1)
* Implementation of State Academic Standards (Priority 2)
* Parent Involvement and Family Engagement (Priority 3)
* School Climate, specifically the sense of safety and school connectedness of students, parents, and teachers (Priority 6)
* Access to a Broad Course of Study (Priority 7)
* Coordination of Services for Expelled Students (Priority 9; for COEs only)
* Coordination of Services for Foster Youth (Priority 10; for COEs only)

LEAs last reported performance levels for local indicators in 2019. In 2020, state legislation suspended the requirement to report local indicators and in 2021, the requirement to report on local indicators resumed for informational purposes on the 2021 Dashboard.

#### Overview and Implementation of Senate Bill 75

Senate Bill (SB) 75 (Chapter 51, Statutes of 2019) requires that “no later than January 31, 2021, local indicators shall reflect school-level data to the extent the department collects or otherwise has access to relevant and reliable school-level data for all schools statewide.” Based on this language, the CDE reviewed the local indicators and one data point from Priority 1, related to the assignment of teachers, met the criteria outlined in SB 75.

The CDE annually collects staffing information through CALPADS. This data is matched with data collected by the Commission on Teacher Credentialing, which allows the CDE to meet the necessary reporting requirements in California’s ESSA State Plan. In 2018, the CDE and the CTC signed a data sharing memorandum of understanding (MOU) to formally exchange teacher and credential data. Since that time, the parties have worked on developing an expanded data exchange to allow the CDE to begin reporting on misassignment data at the state, LEA, and school levels. The CDE is completing the processing of these data with the appropriate definitions applied for reporting in Spring 2022.

Accordingly, for the first time the CDE will prepopulate the 2022 Dashboard with teacher assignment data for Priority Area 1 of the local indicators for informational purposes from the most recent matched set of data from CTC. Additionally, the CDE plans to work with educational partners to develop objective criteria. This work will be done to determine the feasibility of these criteria considering that teacher assignment data represent only one of the three component pieces included within Priority Area 1 in order to accurately and appropriately report these data in future Dashboards.

### 2023 Dashboard and Beyond

While it is difficult to predict future reporting due to continuation of the pandemic, the CDE anticipates reporting Status, Change, and performance level colors for all the state indicators, except for the CCI, in the 2023 Dashboard. We also anticipate reporting Status only for the CCI in the 2023 Dashboard, and reporting Status, Change and performance level colors for the CCI beginning with the 2024 Dashboard. The following are other metrics that the CDE is actively monitoring for potential inclusion in future Dashboards.

#### California Science Test

In February 2020, the CDE presented to the CPAG on the potential use of the California Science Test (CAST) for the 2022 Dashboard. After the first operational CAST was administered in 2018–19, the 2019–20 administration yielded a limited number of students completing the test prior to the Governor’s Executive Order to suspend the administration of the California Assessment of Student Performance and Progress (CAASPP) due to the COVID-19 pandemic. In 2020–21, the administration of the CAST resulted in 16.4 percent of eligible students taking the test and 35 percent of eligible students taking the California Alternate Assessment for Science.

This year, the 2021–22 administration of the CAST will be based on a revised blueprint that the SBE approved in January 2020. With the revised blueprint in place, students will receive a shortened-test, which will contain fewer test questions and at least three Performance Tasks, one from each science domain (i.e., Earth and Space Sciences, Life Sciences, and Physical Science). Each Performance Task will have at least one constructed-response item. If no other changes to the CAST blueprint are made in the future, the 2021–22 administration may be the first data point that could potentially be used for accountability purposes. However, prior to incorporating this test in the Dashboard and making any accountability judgements, the CDE must consider the following:

* When Status and Change are determined for state indicators, two years of data are used to set the cut scores. The results used to set the cut scores are based on full statewide population of students (and not a small portion) to ensure that the standards are fairly set. Given the low participation rate of the CAST in 2020–21, along with the continued uncertainty of the COVID-19 pandemic, it remains to be seen if test participation will increase for the 2021–22 administration so that it can potentially be used as the first data point.
* Prior to including the CAST into the Dashboard, the CDE will need to begin conversations with the ED on the inclusion of this new state indicator in California’s ESSA Consolidated State Plan. ED’s approval of the accountability system is contingent on maintaining a balance between academic and non-academic indicators. It is important to verify with the ED that the inclusion of CAST will not generate an imbalance of indicators. However, before any information can be shared with the ED, the CDE will need to be able to review and analyze the results of a full statewide administration of the CAST.

Because of the difficulty to predict the participation rates of the CAST, the CDE will continue to carefully assess when this test may be used for accountability and will continue to bring this topic to the CPAG at future meetings.

#### Student-Level Growth Model

The SBE approved a student growth model methodology in May 2021 to measure the academic growth for students in grade four through eight. The methodology for these aggregated growth scores requires assessment results from three consecutive years of Smarter Balanced Assessments in ELA and Mathematics. With the resumption of statewide Smarter Balanced testing in Spring 2022, CDE anticipates that the next set of aggregated student growth data will be available in late Fall 2024. This set of growth data will be based on the 2021–22, 2022–23, 2023–24 Smarter Balanced Assessments administrations.

Prior to the next release of data in 2024, CDE intends to continue to build on the foundation of understanding established with the release of the historical student growth data in September 2021. CDE will work with LEAs and the public to develop best practices for communication, data use and data visualization strategies with regards to student growth and the aggregate student growth data scores. Additionally, CDE will report on the reliability, validity and comparability of the growth scores as the calculations are completed. At a minimum, CDE will update the SBE and CPAG annually, through 2024, on the progress and status of these additional tasks.

The SBE has not taken any action as to include upcoming student growth data, when available, either on the Dashboard or within the accountability system. If the SBE has a desire to incorporate the growth scores into an existing indicator, or add it as an additional indicator to the Dashboard, this change may require additional SBE decisions to modify either the ESSA State Plan, the eligibility determinations for differentiated assistance under LCFF, or both.