



February 28, 2018

Tom Torlakson
State Superintendent of Public Instruction
1430 N Street
Sacramento, CA 95814

Dear Superintendent Torlakson,

As the California Department of Education continues to finetune the new school dashboard, we urge the department to: pursue a residual gain student growth model; and reconsider how chronic absence is being calculated. We have outlined our two recommendations below, and we look forward to further exploring them with the department.

Student growth measure

We appreciate CDE's analysis of potential growth models, and we are not surprised by the findings that a residual gain model works best for California. The CORE Districts have been calculating and using a residual gain growth model for several years, and we recommend the state pursue a model similar to the CORE model that controls both for student prior achievement and for peer effects.

We agree that controlling for student prior level achievement is the most important, but it does not level the playing field based on our analysis. To level the playing field, the CORE model takes into account students' prior test history and their status as economically disadvantaged, with disabilities, English learner, homeless or in foster care, all which may influence growth. Not only are these adjustments made at the student level, but our growth model also adjusts for concentration of these characteristics within the school.

This means that low performing schools, specifically schools that serve lots of low income students, English Learners and other historically disadvantaged groups have an equal chance of showing strong growth as high performing schools with mostly non-poor students. For school improvement and accountability purposes, we strongly believe all schools and students, high and low achieving, should have the opportunity to demonstrate all levels of growth.

If California truly wants to identify which schools and districts are having the greatest impact on improving student academic achievement outcomes, then California should adopt a growth model that controls for various factors outside of the school's control. While concerns may be raised that controlling for various factors could loosen accountability for closing gaps, we do not see it that way. Status data will continue to highlight gaps and whether those gaps are

closing or widening. A well-specified growth model like the CORE model will help educators, stakeholders and parents see who is impacting growth most for our historically underperforming students.

Once a decision about the growth measure is finalized, issues about translating results into public facing data, and addressing error and sample size must be addressed. Using typical statistical approaches to growth, data from a growth model come out generally on a scale for -2 to 2 with 0 being average. There are various ways to transform that information into something more easily comprehensible. At CORE, we translate it to a 0 to 100 scale where 50 is average growth. In addition, other states using residual gain models correct for known error in the test, and they address issues of small sample sizes. These technical issues should be considered by the CDE as soon as possible to ensure California's smooth transition to growth.

Chronic absenteeism measure

We appreciate that CDE made its first set of chronic absence data available via a link to Dataquest from the dashboard in November. The CORE Districts have been comparing the new state calculation on chronic absence with our own, and not surprisingly we have found some differences in the calculation methods.

While some of these differences are relatively more arbitrary choice points, there are a couple of features of the CDE calculation method that may be prone to misinterpretation, and may be worth revisiting. We know we had to struggle with these as we developed the CORE calculation as well. Specifically, these are:

- Students are counted if they have been continuously enrolled for at least 30 days. The concern here is about the small number of absences required to be considered chronically absent (at minimum, 3 days out of 30). A simple cold or brief flu could easily accrue 3 days of absence, and for a student who perhaps re-enrolled in another school and was never absent again for a total of 3 absences in 180 days, the student would be counted as chronically absent at one of their two schools, when in fact, his/her attendance for the year was very strong. We recommend extending the threshold. While there is no magic threshold, the CORE districts have set it at 45 days of enrollment (one academic quarter), requiring at least 5 absences to be considered chronically absent.
- Students are counted at each school with 30+ days of continuous enrollment, theoretically accruing as many as 6 records in a given school year. One student's influence on school records could be six times the influence of another 'single enrollment' student.
 - We recommend counting each student once, and attaching the attendance label to either a) the last school attended in the year, or b) the school at which there was the longest continuous enrollment.
 - We further recommend that the student attendance rate be calculated only once, for the cumulative number of days of enrollment in the year,

and then attached to the school/district/county/state as in the above bullet. This allows the student's attendance label to be assigned based on the whole year, and will reduce false positives (students with good attendance who had a brief enrollment at one school with 3 absences).

As California moves forward with the dashboard, we urge you to consider our recommendations. Together we believe that we can continue to improve this new, broad look at student and school performance.

Sincerely,



Christopher Steinhauser
President, CORE Districts
Superintendent, Long Beach Unified School District

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