



October 30, 2020

Dr. Linda Darling-Hammond, President, and Members,  
California State Board of Education (SBE)  
1430 N Street, Room 5111  
Sacramento, CA 95814

Subject: Item 14 - Verifiable Data – Recommendations to the State Board of Education

Dear President Darling-Hammond and State Board Members,

The California Charter Authorizing Professionals (CCAP) appreciates the opportunity to provide this input regarding Item 14 (Verified Data) on the SBE's November 6, 2020 agenda. CCAP is a nonprofit 501(c)(3) organization dedicated to strengthening charter school authorizing in California. The mission of CCAP is to "advance quality public education for all students by providing professionals with the support, resources, and collective voice necessary to foster high-performing, fiscally sound, autonomous, and accountable charter schools."

California has the largest number of authorizers in the country at more than 330. A number of these authorizers have sizable portfolios of charter schools and are among the most capable and sophisticated authorizers in the country. CCAP and California as a whole benefit greatly from their expertise. At the same time, the overwhelming majority of California's authorizers are small authorizers, and they authorize the majority of charter schools in our state. Ninety-two percent are small authorizers, defined as school districts or county offices of education that authorize six or fewer charters.

This context is important because small authorizers typically do not have enough funding from charter school oversight fees to employ even one full-time staff person to be responsible for charter school authorizing and oversight. Due to this lack of funding and dedicated staffing, these authorizers need significant support and guidance for effectively and efficiently meeting their responsibilities. A major focus of our comments today reflects our concern that the decisions the State Board of Education makes regarding verifiable data support the needs of small authorizers.

Specific Recommendations and Comments

Include California Assessment of Student Performance and Progress (CAASPP) Data as Verified Data:

CAASPP data is a primary source of academic achievement data statewide and for every district and school in California. It meets the state's high standards for validity. While CAASPP data is used in the Dashboard, it is important to recognize that the usefulness of the CAASPP data goes beyond the Dashboard. It is also the assessment with which authorizers (and charter schools) are most familiar, and there is a substantial body of technical and user support documents for its use.

Supports Needed for All Verifiable Data Sources: The data sources being recommended by WestEd and any additional sources that are included in the final action by the SBE need to be accompanied by the technical resources and guidance to ensure their appropriate and reliable use. None of these assessments were originally created to be used as a crucial source of data to support high-stakes authorizing decisions. While authorizers are committed to meeting their difficult responsibilities, it is important that they have the support they need to ensure they can use these and other data sources in an appropriate and defensible manner.

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CCAP is a California non-profit corporation:  
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Include the CORE multiple-measure school accountability system: The CORE accountability index is a sophisticated and fully documented accountability system specifically designed for the California context. It also provides student growth, school climate, and student SEL data in an organized and coherent manner. It is appropriate to allow authorizers to choose to utilize this data source/accountability system, especially if they already are familiar with it because they are using it for their own district schools.

Include an Expansive Definition of College: A definition of college that allows authorizers to consider a range of aspirational post-secondary preparation and options will afford them more options for developing a complete view of a school's performance. Adopting a too restrictive definition or too narrowly limiting the data sources an authorizer may consider will limit their options at a difficult time. This is especially important in the evaluation of schools providing dropout recovery and similar programs.

Appropriate Implementation Timeframe: The decision to renew or not renew a charter should be based on the charter's performance from the date of its approval or last renewal and is typically five years. Requiring authorizers to use, or limiting them to using, student assessment data for high-stakes decisions that have not previously been contemplated as part of the ongoing oversight and renewal process, with little or no notice, risks setting them up for disruption and difficulty they can ill afford now.

Recognize the Need for Ongoing Flexibility for Authorizers: There is language in the proposal that limits and restricts an authorizer's ability to use data: for example, mandating 100% student participation and limiting comparability to only statewide or districtwide comparisons. For some schools and in some situations, this can be too restrictive. Authorizers need the flexibility to determine if an assessment is valid in the school's context, and serves its program and population.

In summary, CCAP recommends that SBE's criteria incorporate flexibility throughout for authorizers in recognition that the ongoing impact of COVID-19 on learning is serious and long-term for all public schools. The entire K-12 education system needs the courage to do things differently, creatively, and with the flexibility to address student learning loss and accelerate learning.

Thank you for the opportunity to provide input. We are happy to provide any additional information and further assist the SBE in this work.

Sincerely,

*David Patterson*

David Patterson  
President  
Board of Directors



Tom Hutton  
Executive Director

Attachment: CCAP: Advancing Equity and Access Through Quality Authorizing

## ***CA2.0 - Advancing Equity and Access Through Quality Authorizing***

Three million students attend charter schools across the country, one in five of them are in California. In 1992, California became the second state to pass a [charter school law](#) and today, more than 675,374 students — one in ten — are enrolled in 1,303 charter schools, according to California's [Education Data Partnership](#).

With rapid growth came growing pains. Many charter schools are recognized for their excellence, but some fall short of realizing the intent of the charter school legislation to improve student learning, encouraging innovative teaching methods and implementing measurable accountability systems.

In 2014, a group of charter school authorizing professionals, dedicated to the belief that effective authorizing is fundamental to improving charter school quality, founded the nonprofit [California Charter Authorizing Professionals](#) (CCAP).

In an innovative new project, CCAP is partnering with [WestEd](#) on ***CA2.0 – Advancing Equity and Access Through Quality Authorizing*** to develop a comprehensive set of actionable tools and resources that meet the varied needs of California authorizers, with a special focus on access and serving English learners and underserved students effectively.

“High-quality authorizing is at the heart of equity,” said David Patterson, president of CCAP’s board of directors. “It empowers educators and parents to provide all children the excellent education they deserve and that a more just society demands.”

CCAP’s accomplishments make it uniquely qualified to meet this challenge.

- Conducted the first state-wide survey of California authorizers
- Providing high-quality webinars, resources, and ongoing training for authorizers, guidance on COVID-19.
- Creating Authorizer Toolkits in partnership with WestEd, which will provide powerful new resources for charter review and oversight.
- Partnering with the [California Small School Districts’ Association](#) (SSDA) to address their unique challenges as small authorizers.
- Partnering with the [Colorado Association of Charter School Authorizers](#) (CACSA) and the [Florida Association of Charter School Authorizers](#) (FACSA) to create the [Tri-State Alliance to Improve District-Led Charter Authorizing](#).

To learn more about CCAP and to access our Resource Library visit [www.calauthorizers.org](http://www.calauthorizers.org).