April 9, 2020

The Honorable Tony Thurmond
California Superintendent of Public Instruction
Department of Education
1430 N Street
Sacramento, CA 95814-5901

RE: Recommended Guidance During COVID-19 School Closures

Dear Superintendent Thurmond:

Thank you for your leadership, and the guidance issued by the California Department of Education (CDE) thus far to help local education agencies (LEAs) manage in the midst of the COVID-19 pandemic. I am writing on behalf of The Education Trust—West to provide our recommendations on additional guidance that you could offer to help LEAs serve low-income students and students of color during the crisis and avoid exacerbating opportunity and achievement gaps during the crisis.

1) Basic Needs of Students – A recent waiver by the U.S. Department of Agriculture (USDA) permits schools to continue meal programs by requiring children to travel to meal service sites with a parent. While this is a step in the right direction, we have some concerns for students who do not have a parent at home or no way to safely travel to the meal site. Moreover, traveling to a meal site may compromise social distancing and expose students to COVID-19.

We need the CDE to work with the Department of Social Services to follow through on 4 key steps to advance Pandemic-Electronic Benefits Transfer (P-EBT) implementation. First, apply with the USDA to opt-in to the P-EBT supplemental meal service program. Second, work with key stakeholders to craft a detailed plan for implementation. Third, use emergency contracting and rule-setting procedures to expand eligibility for this program, especially to those families/students who are not already Cal-FRESH participants (in some communities, the majority of students are eligible for Free or Reduced-Price Meals so the school meal program is free to all; in these circumstances all families rely on the meal program). Fourth, make outreach a priority by collaborating with organizations who provide application assistance for P-EBT, sustain outreach so long as schools remain closed, and conduct it in multiple languages.

We recently commissioned a statewide representative poll of 1,200 parents with children in the K-12 public schools, and 85 percent of low-income households reported providing ATM-like cards for food would be helpful.

2) Expectations Regarding Equitable Access to Educational Resources and Services -- Missing learning time can be especially costly to students that are already underserved in our schools. At the same time, inequitable access to technology and internet, lack of support for educators to teach via an online medium, and lack of resources for families to support their children’s education can cause many distance learning approaches to widen disparities. Our digital divide map highlights that districts with the largest populations of low-income students, students of color, English Learners, students with disabilities, and students experiencing homelessness are likely to be hardest hit by COVID-19 school closures and the digital divide.
Our recent parent poll underscored these concerns:

- Low-income and Latinx parents are least likely to feel confident about technology.
- Low-income parents who expressed a lack of confidence with distant learning reported access to a computer and a reliable internet connection as their top concerns.

We urge CDE to:

a. **Survey Families’ Access to Technology in Multiple Languages**: Develop a text-message/phone-based survey for districts to use to assess families’ technological resources (e.g., devices available to students), internet access, as well as students’ other responsibilities and available adult supports in the home so as to develop an equitable distance-learning approach. Provide the survey in multiple languages to maximize accessibility.

b. **Ensure Access to Technology**: Partner with businesses and internet providers to offer laptops/tablets and expanded internet service in high-poverty communities to enable all students to access remote learning opportunities.

c. **Provide Resources for Housing-Insecure Students**: Support district leaders in coordinating with homeless shelters and other facilities serving housing-insecure families to ensure children have the space and resources they need to participate in any distance learning initiatives.

d. **Require Detailed Distance Learning Plans**: LEAs are coping with COVID-19 differently, and we believe the state should monitor distance learning to ensure minimum standards to avoid leaving some students further behind. Publication of distance learning plans will allow for this monitoring.

Communicate the expectation that every school district should develop and communicate a detailed plan for distance learning that is shared on district and school websites, distributed electronically to parents, and sent via U.S. mail. The CDE can provide a plan template, that at a minimum, should include:

- Modes and frequency of communication from teachers and school/district leaders
- Grading/feedback expectations and policies
- Universal access to instructional materials and equipment, including technology if online learning is to be utilized
- Universal access to student and parent supports, such as virtual office hours by telephone or by video meetings
- Resources and services aimed to support students’ social-emotional wellness
• Targeted supports for English learners and students with disabilities that are aligned to their education plans, including:
  o Telephone or internet lessons and at-home study and activity packets tailored to student needs. (The CDE should vet and curate remote learning resources for English learners and students with disabilities, that are standards-aligned, and identified for each grade level, subject area, English learner level, and disability type.)
  o Multi-lingual hotlines staffed by special education and English learner experts where families can receive advice about how to best support students at home, and that can connect students with counseling and mental health services if needed.

e. **Provide Clear Guidance on Assessments:** Guide districts in the implementation of a system to monitor student learning and wellness, during distance learning and after the return to on-site learning. LEAs should be encouraged to use formative assessments, such as the California Assessment of Student Performance and Progress (CAASPP) interim assessments, to continue to monitor student learning and progress. In the absence of 2020 CAASPP data, the CDE should increase access to these locally administered assessments and provide support and guidance on administration and analysis of assessment data. In addition, the CDE should provide guidance on effective intervention practices for students, especially those who were most impacted by the disruption in learning.

Provide guidance to districts about flexibility related to their English learner reclassification process, including ensuring that English learners have access to the English Language Proficiency Assessments for California (ELPAC) upon their return to school to assess progress towards reclassification and the assignment of the most appropriate educational program and services. Students who were otherwise on track for reclassification but were unable to take the ELPAC in the spring of 2020, should still have the opportunity for reclassification as soon as possible, and in time to influence course scheduling for the fall of 2020.

3) **Support for Teachers** – Teachers are learning to do their jobs differently through the use of technology, while also coping with the stress of the pandemic and personal issues such as child care. They are on the front lines in the fight to ensure high-quality teaching and learning during the crisis.

We need LEAs to keep the needs of teachers high on their list of priorities. State guidance should recommend providing time, tools, and virtual space to collaborate on planning, co-teaching, and peer support through affinity programs. Ensure that new teachers and teachers in isolated or rural areas have access to these supports, and consider providing flexible schedules and/or consider video recording sessions so that teachers with young children can balance instructional duties with time with their families.
CDE can lean on expertise of schools and institutions that already engage in this practice, such as universities or K-12 public schools with track records of success delivering equitable remote learning.

4) **Longer Term Planning** – We are very concerned about learning loss during the crisis, and the disruptions and stress caused by COVID-19 are likely to impact students even after schools reopen. We recommend that CDE work with district leaders now to plan for these challenges, including how to leverage the summer months and how to structure the 2020-21 school year. These plans should include detailed guidance for how to support students that are struggling academically, as well as how to provide the mental health/counseling supports many will need.

According to our recent statewide poll, parents’ biggest concern is learning loss and having children fall behind.

5) **College and Career Readiness** – We need LEAs to take steps to ensure students stay on track for high school graduation and UC/CSU eligibility. For 12th grade students, require districts to allow students to graduate so long as they meet the state-required graduation requirements, if the district’s requirements exceed state requirements and the student hasn’t met the district’s requirements. For students in grades 9 through 11, adjust the credits required to graduate so the 2019-2020 year does not slow their progress toward graduation.

We recommend that LEAs prioritize actions necessary to continue delivery of A-G courses. Provide students and families information and options of online learning platforms in multiple languages with instructions on how to enroll and the importance of enrolling. Create drive-thru services for students and families to pick up electronic devices and hotspots with the option to ship to students’ homes if they lack transportation. Provide teachers with options, resources, and instructions for supporting online learning. Also provide them with electronic devices and hotspots should they need them.

Thank you for including me in your work groups on these matters. We would like to assist and serve as a resource as much as possible.

Sincerely,

Dr. Elisha Smith Arrillaga
Executive Director

cc: President Linda Darling-Hammond, State Board of Education
Karen Stapf Walters, Executive Director, State Board of Education
Stephanie Gregson, Chief Deputy Superintendent, California Department of Education
Jenny Johnson, Deputy Legislative Secretary, Governor’s Office