

August 31, 2018

Dr. Michael W. Kirst, President  
State Board of Education  
1430 N Street, Suite #5111  
Sacramento, CA 95814

**RE: September 2018 Agenda Item #1: DASS One-Year Graduation Rate**

Dear President Kirst:

As organizations advocating for equitable opportunities for marginalized students, including students of color, low-income students, and English learners, we write to comment on the modified one-year graduation rate indicator for Dashboard Alternative School Status (DASS) schools.

1. **Number of DASS schools without a rating.** While we are excited to see progress in the development of the one-year graduation rate for DASS schools, we are concerned that almost half of these schools will not receive a color rating due to having less than 30 students counted in the graduation rate calculation. At the May 2018 State Board of Education (SBE) meeting, the board approved the one-year grad rate, with an n-size of 15. However, based on the September 2018 agenda item, it appears the decision to have an n-size of 30 was made behind closed doors. The lack of a dashboard rating for so many schools as a result of this decision creates ambiguity and confusion for stakeholders in understanding how well schools are doing at graduating students. While there are provisions in the ESSA state plan to use an alternate methodology to identify schools that don't receive a color rating, we urge the board to reconsider the n-size necessary to receive a rating for this indicator. At a minimum, we hope that graduation rate information will still be available on the dashboard for these schools. It is important that this outcome information is still transparent for stakeholders, even in the absence of a color rating.
2. **Public reporting of transfer monitoring.** We also understand that the implementation of the one-year graduation rate could create an incentive to transfer students from comprehensive high schools to alternative schools when it may not be necessary. This concerns us because, while alternative schools are the best option for some students, comprehensive high schools often have more academically rigorous graduation requirements. It is important that schools are not incentivized to unnecessarily transfer students away from a program that provides better preparation for college and career to improve its graduation rates. We are happy to hear that California Department of Education (CDE) staff plan to monitor comprehensive-to-alternative school transfers to determine whether transfer trends change after the implementation of the one-year graduation rate. We urge staff to publicly share the findings of this monitoring so that stakeholders have a full understanding of these trends if they arise.
3. **Encouraged by DASS progress, would like to see more.** Finally, kudos to CDE and State Board of Education (SBE) staff and the board on the progress made on the one-year graduation

rate. We know that there are modified measures being considered for the college and career indicator, and some potential local measures to capture how successfully students are attaining credits in DASS schools and other outcomes. We urge the board and staff to make steady progress on implementing these and other modified measures, with a sense of urgency. While the one-year graduation rate is a step in the right direction, there is much more to be done to ensure DASS schools are providing quality educational opportunities to their students.

Thank you for the opportunity to comment. We stand ready to collaborate with CDE and SBE staff to implement meaningful measures that surface the unique needs of alternative schools. It is critical that these needs are met to ensure traditionally underserved students receive equitable opportunities to succeed.

Sincerely



Ryan J. Smith  
Executive Director  
The Education Trust—West



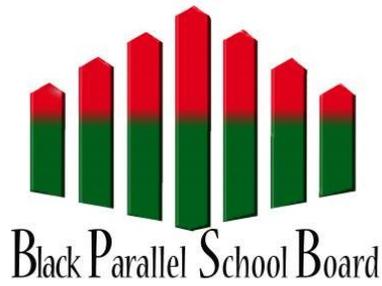
**The Education Trust—West**



**Asian Americans Advancing  
Justice – Los Angeles**



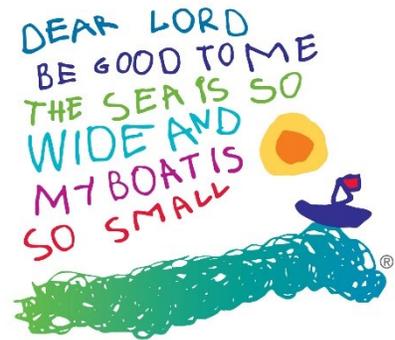
**Barrio Logan College Institute**



**Black Parallel School Board**



**California Latino School Boards Association**



**Children's Defense Fund  
CALIFORNIA**



**Congregations Organized for Prophetic Engagement**



**Innovate Public Schools**



**Kid City Hope Place – Urban Foundation**



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**Parent Institute for Quality Education (PIQE)**



**SBCUSD African American Advisory Council**



**Somos Mayfair**

cc: Members of the California State Board of Education  
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Judy Cias, Chief Counsel, California State Board of Education  
David Sapp, Deputy Policy Director and Assistant Legal Counsel  
Amber Alexander, Local Control Funding Formula  
Jeff Breshears, Director of the Local Agency Systems Support Office, CDE  
Barbara Murchison, State Lead, ESSA State Plan Office, CDE  
Jeff Bell, Program Budget Manager, Department of Finance