



July 15, 2020

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

RE: TEMPLATE FOR LEARNING CONTINUITY AND ATTENDANCE PLANS

Dear Superintendent Thurmond:

I am writing on behalf of The Education Trust—West to provide our recommendations regarding the template for local educational agencies (LEAs) to use in completing their Learning Continuity and Attendance Plans. We reviewed the draft of the template released by the California Department of Education on July 13th and recommend adding a requirement for each LEA to define its expectation for synchronous, online instruction by grade level, and modifying sections on “Access to Devices and Connectivity” and “Pupil Engagement and Outreach” as explained below.

1) Synchronous Instruction – Require LEAs to Define Its Expectation for Synchronous, Online Instruction by Grade Level

The final state budget agreement enacted a policy framework (SB 98 Omnibus Education Trailer Bill) for distance learning. Provisions included in the trailer bill require LEAs to confirm students have devices and an internet connection to participate in online instruction, deliver instruction with content that is aligned to grade level standards and provided with a quality and intellectual challenge substantially equivalent to in-person instruction, and provide supports to students who are not performing at grade level, such as English Learners or students with special needs. We support all of these provisions.

We remain concerned, however, about daily, live instruction and whether low-income students and students of color will receive what is needed to learn and thrive. According to trailer bill provisions, when distance learning is required, LEAs must ensure students have daily live interaction with certificated employees, or when this is determined to be infeasible, provide an alternative plan for frequent live interaction that provides a comparable level of service and school connectedness.

We agree with our colleagues in the Equity Coalition who wrote to the State Board of Education on July 2, 2020:

“The State Board has been given the directive under SB 98, *inter alia*, to adopt “distance learning...instructional guidance” for math, English Language Arts and English Language Development. (SB 98 Section 120(g). As an early action under this authority, we urge the State Board to provide immediate guidance around daily synchronous instruction. We believe that for most grades this interaction should be at least 3 hours per day, although lower levels may be age appropriate in early grades. As a further immediate term action, ***we encourage the Board and the SPI to include specific requirements in the Learning Continuity plan template that require districts to define what their minimum daily live interaction expectations will be.*** SB 98 provides that the plan template must require



districts to specifically “measure participation... through live contacts and synchronous instructional minutes” SB 98, Section 34, Ed Code Section 43509 (f)(1)(B)(iii). At a minimum, it will be important for LEA distance learning plans to provide details on how the LEA will meet the “daily live” interaction requirement, including what minimum level of daily live “participation” is being planned.”

Synchronous instruction offers many benefits, such as greater student engagement with the content, as well as opportunities for engagement with teachers and peers. Synchronous instruction also enables students to ask questions and seek support from teachers. Unlike using recorded or one-way instructional methods, synchronous instruction enables teachers to engage in real-time formative assessment, monitor student learning and engagement, and elaborate on concepts or skills as needed. Asynchronous instruction, such as recorded lessons, can supplement live instruction, but is unlikely to provide instruction comparable to the quality of in-person instruction, nor does it nurture student-to-teacher or student-to-student connections and relationships, that are essential for social emotional wellness and connectedness to school. Students who are served only with asynchronous instruction will likely fall behind, and also forego important experiences that occur during instruction, such as inspiration to learn more or motivation to pursue higher education.

We urge you to require every LEA to define its expectation for synchronous online, instruction by grade level in the Learning Continuity and Attendance Plan template. This will provide parents with basic information regarding the level of service to be provided and allow for advocacy at the local level and statewide monitoring.

2) Enhancements to Section titled “Access to Devices and Connectivity”

We recommend that the section titled “Access to Devices and Connectivity” be enhanced to require LEAs to describe how they will: 1) ensure access to devices and connectivity for all pupils (on a 1:1 basis); 2) gather data to monitor the extent to which all pupils have sufficient access and connectivity to participate in online instruction; 3) provide multilingual technology support to pupils and their families to successfully use online learning platforms and instructional resources; and 4) ensure equitable access to the full grade level curriculum for students who still lack access to devices and/or connectivity despite the LEAs best efforts to provide it.

3) Revisions to Section titled “Pupil Engagement and Outreach”

We recommend that the section titled “Pupil Engagement and Outreach” be revised to “Pupil and Family Engagement and Outreach,” and include in the description the strategies LEAs will use to engage and support families as essential partners in distance learning. This engagement should include strategies to ensure pupil participation in meeting compulsory education requirements, but also include strategies to support engagement with the curriculum and student learning. Distance learning presents a unique opportunity for families and teachers to collaborate and mutually support each other to ensure student learning.



The Education Trust–West
Fierce advocates for educational
justice, pre-k through college.

Thank you for considering our views. 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