

West Contra Costa Unified School District
Office of the Superintendent

Friday Memo
September 25, 2020

Upcoming Events – Matthew Duffy

- September 28: Agenda Setting, 4:30 PM
- September 30: Board/CBOC Joint Meeting, 5:00 PM
- October 1: Board Retreat, 4:00 PM
- October 7: Regular Board Meeting, 6:30 PM
- October 13: Facilities Committee, 3:00 PM
- October 13: DLCAP Meeting, 6:30 PM
- October 15: Governance Committee, 5:30 PM
- October 20: AASAT Meeting, 6:15 PM

Resolutions Supporting Schools and Communities Propositions - Matthew Duffy

At the recent board meeting, Mr. Phillips mentioned that the Board had previously approved a resolution for the Schools and Communities First proposition. Attached you will see [Resolution No. 40-1920](#) that was approved in December 2019 prior to the initiative making it to the election ballot. [Resolution No. 24-2021](#), approved by the Board at its September 23, 2020 meeting is also attached.

Understanding The State Color Coding System & WCCUSD Conditions Necessary Prior to Consideration for Reopening of Schools in Any Capacity - Tony Wold

This is a summary to describe the current status of information from the State of California, Contra Costa County Office of Health, and the Board and Bargaining Unit approved Memorandum of Understanding regarding the conditions necessary to consider a return to in person instruction. The chart below shows the current conditions and how the State colors match up to the District’s criteria.

		Daily New Cases (per 100,000)		% Positive Tests	
State Color	Status and Restrictions	State Criteria	District Criteria	State Range	District Criteria
	Widespread Many non-essential indoor business operations are closed	More than 7	Less than 10 Must be by Zip code in county and in surrounding	More than 8%	
	Substantial Some non-essential indoor business operations are closed	4 - 7		5 - 8 %	
	Moderate Some indoor business operations are open with modifications	1 - 3.9		2 - 4.9%	3% or less Must be by Zip Code in county and surrounding counties

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	Minimal Most indoor business operations are open with modifications	Less than 1	counties where our employees live	Less than 2%	where our employees live
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The District criteria is based upon the data being available by **zip code within Contra Costa County and all zip codes must meet the criteria.** In addition, the District criteria requires that the counties surrounding Contra Costa must also be in compliance with the District policy to consider reopening. This is for the safety of our students and staff as employees in a purple county could not come into work and if they did bring the risk of exposure each day.

While the District criteria of or less cases is actually less strict than the State’s, the sorting by zip code requirement means that even though the county moves tiers, the District would need to monitor that all zip codes also were below the criteria. **The District’s criteria of 3% or less does not occur until the Orange band of the State’s criteria.** Therefore, the District would not be in an area to monitor reopening until Contra Costa County (and all zip codes) as well as our surrounding counties had moved into the Orange tier.

Once all groups enter the Orange tier, the twenty-one day count down would start prior to any consideration and would need to remain in place without any surges. Any surge during this time period would restart this countdown. The twenty-one day criteria would need to be met before the possible reopening discussions would begin. There are other criteria that would also need to be met after obtaining the Orange tier. This includes the access to immediate and available testing, the turnaround in test results, and the contact tracing protocols. Each of these would need to be validated and ensured accurate for considerations.

We plan to provide an update on the District website once the County, and our neighboring counties, enter into the first criteria, Orange, where it may be possible to start our countdown for re-entry. We are confident that our criteria will ensure the safety of our students and staff while we remain committed to providing the best possible educational program in our distance learning model.

Budget Next Steps - Tony Wold

With the approval of the Unaudited Actuals the District **has certified that it will be able to meet its financial obligations** for this current (2020 - 2021) and next school year (2021 - 2022) with the likely need to make reductions for the second out-year (2022 - 2023) due to significant concerns regarding the State of California funding of K-12 Education. This is a significant step for the District and was acknowledged in a [letter](#) (linked) from the Contra Costa County Office of Education which oversees the district’s financial reporting. By making the necessary budget reductions for this year, solidifying position control and maintaining strict budget controls to not allow for spending above what is in the ongoing operational budget and committing reserves for the next two fiscal years the District has become a model for other urban districts across the State and our work was highlighted in the most recent [EdSource article](#) (linked).

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The ongoing WCCUSD budget deficit has been reduced to be similar to those that all other school districts in California are facing due to reduced State funding and can be traced to the loss of a Cost of Living Increase from the State and the increased costs that Districts must pay for retirement (State Teachers Retirement System - STRS and Public Employees Retirement System -PERS) which costs were passed on by the State to District beginning in 2016 - 2017.

- Up until 2016 - 2017 the District had always been required to pay a set percentage:
 - 10.73% of Certificated Salaries for STRS
 - 11.847% of Classified Salaries for PERS

- In the current, 2020 - 2021 school year the District is paying the following percentage
 - 16.15% of Certificated Salaries for STRS
 - 20.70% of Classified Salaries for PERS

In simple mathematical terms the changes in STRS and PERS **additional costs to the District in real expenditures since 2016 - 2017 were over \$46,459,416**. This is real money that was spent that did not provide any additional services or supports. As we built our operational budgets the District always built in the costs of STRS and PERS but the singular move by the State to increase the rates 4 years ago means that today we are spending over **\$20 million more ongoing per year**, every year, to pay for something that is constitutionally a State of California requirement.

As we look to the future, the District must advocate for additional funding, such as Proposition 15. But that will not be enough! We need to look at ways to increase ADA and enrollment, and we must look at our other assets that can generate ongoing income to support the programs and needs that our community has identified to serve our students.

Partners in School Innovation for 2020/2021 school year - Rubén Aurelio & team

We are continuing our work with Partners in School Innovation (Partners) for the 2020/2021 school year and have received generous grants from Silver Giving Foundation, Stone Foundation, San Francisco Foundation, and Hellman Foundation to cover the full cost of \$440,000. Attached is the [MOU](#) between WCCUSD and Partners. To highlight there are two overarching objectives of this work with Partners in School Innovation. They are,

1. To move towards sustainable school transformation by working with school and district leaders to deepen and further systematize the structures and routines that have been built over the past three years.
2. Bring a deep, intentional focus on improving the core instructional program at school sites whether that be via continued distance learning, hybrid teaching, or in-person teaching.

Update on Curricular Flexibility and EL Education - Rubén Aurelio
About the EL Education Curriculum

[EL Education](#) is an Open Educational Resource (OER) K-8 curriculum. The curriculum is comprehensive (phonics, reading, writing, vocabulary development, listening and speaking), research-based, and is being used as the core language arts curriculum in districts across the country.

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EL Education was originally commissioned by the state of New York, and released as EngageNY. (It should be noted that many of our sites use the EngageNY/Eureka Math curriculum in place of the District adopted mathematics curriculum.) In 2017 the second edition was released with the name EL Education.

Components of EL

- **Module Block:** An hour-long content-literacy based time that serves as the anchor of the curriculum. Each grade has four modules, which build content knowledge while being focused on a specific topic related to science, social studies or literature. Throughout each module are rigorous, CCSS writing tasks that are connected to the reading and content from each module. Embedded in the curriculum are performance tasks, and writing projects that are tied to the content of each module. EL’s content-based curriculum allows students to go deep into specific topics. This work is aligned with the District’s commitment to deeper learning. Books by EL’s founder, Ron Berger, include [Learning that Lasts](#), which serves as a practical guide to deeper instruction.
- **Skills Block:** K-2 grades have a daily “Skills Block” which covers the foundational skills necessary to develop proficient readers. Skills Block uses a research-based approach ([Phase Theory of Dr. Linnea Ehri](#)) for structured phonics instruction. Within this block, the Reading Foundations standards are explicitly taught and assessed, as well as some Language standards.
- **ALL Block:** Grades 3-6 have the “Additional Language and Literacy” block which ensures the diverse needs of students are met. The ALL block allows students more time to practice skills and learning introduced in the module lessons. There are five components of the ALL Block -- independent reading, additional work with complex text, reading and speaking fluency, writing practice, and word study and vocabulary.

The [curriculum overview](#) provides more in-depth information on the curriculum.

EL Education is one of the few comprehensive curriculums that is highly rated by [EdReports](#), an independent organization that reviews curriculums and alignment to the Common Core Standards. EL’s content-based literacy approach (organizing their modules around a history or science topic) has received top ratings (32 out of 32) in “Building Knowledge” from EdReports. (EL Education is EdReports’ highest rated ELA K-5 curriculum overall.) At each grade level span that EdReports focuses on (K-2, 3-8) and each individual grade level, EL is “green rated”, the highest ranking EdReports gives curriculum. [Further research](#) and case studies back up the legitimacy of the EL curriculum.

Implementation Process

Five schools have been using EL Education as their ELA curriculum since the 2019/20 school year. The schools are: Nystrom Elementary, Michelle Obama Elementary, Peres Elementary, Verde Elementary and Helms Middle School. Murphy Elementary is in its first year of implementation, while the other sites are in their second year of implementation.

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The process to begin using EL Education at these sites started parallel to the District's adoption of Teachers College in the Spring of 2019. These sites engaged in months of learning and shared inquiry, rooted in curriculum research, the instructional shifts outlined in the Common Core Standards, and looked at several different, highly-rated, and aligned ELA curriculums (Wit and Wisdom and Core Knowledge).

These sites engaged with the Superintendent and the Ed Services team over the course of Spring 2019 to discuss implementation of this curriculum. The Superintendent granted permission for teachers to opt into using the EL curriculum.

During the 2019-20 school year sites engaged in regular professional development (PD) on EL and the Common Core Standards. Teachers were provided with three full days of professional development by [Better Lesson](#), who partners with EL Education to provide professional learning. In addition, site leaders received additional PD from Teaching Lab. This past summer teachers opted into a multi-week "EL Bootcamp" PD led by [Teaching Lab](#) on EL Education. All told, this summer PD neared 20 hours of additional learning opportunities.

Thus far in the 2020-21 school year, sites have partnered with [TNTP](#) to provide PD for teachers, and will continue to during the year. The majority of teachers at each site have attended the [Standards Institute](#), either in person or virtually. Standards Institute is a conference focused on aligning instructional practices with standards and content, through the lens of equity. Sites will also have teams attending the [EL Education Virtual Summit](#) next month. The focus of this conference -- "Racial Justice Quality Curriculum Social-Emotional Learning" -- is aligned with our District's current priority on race and equity.

The EL curriculum, and the professional learning these sites have been engaged with, has focused on the [shifts of the Common Core](#):

- **Complexity:** regular practice with complex text and academic language.
- **Evidence:** Reading, writing and speaking focused on evidence from literary and informational text.
- **Knowledge:** Building knowledge through content-rich nonfiction.

In addition to this, each of these sites are engaged in a Community of Practice that involves school leaders, coaches, and teachers in monthly professional development focused on implementing high quality curriculums (math and ELA), bolstering data driven instruction practices, and race and equity. These CoP meetings are in addition to the regular Friday PDs schools are engaged with each week.

The decision to grant the schools autonomy was rooted in both data and teacher voice. The five elementary sites have shown growth in ELA SBAC scores over the last 4 years (2015/16 - 2018/19).

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Cumulatively, the schools average about 5% growth on SBAC. Over those four years three of these schools are among the four schools showing the most growth (Murphy, Verde, and Nystrom) in ELA. Prior to implementing the EL curriculum, each of these sites had teachers piloting several curriculums, and the Instructional Leadership Team at each site was deeply involved in the process.

Teachers at each of these sites are able to use the Teachers College curriculum if they choose and all have access to the district PD available.

While it should be noted that any curriculum adoption is a multi-year venture deeply steeped in adult learning, these sites have committed to sharing curriculum-embedded assessment data to allow continued evaluation of this pilot.

Charter School Reform Changes and Summit Renewal Submission - Tony Wold (Denise Cifelli)

Two assembly bills went into effect: AB 1505 on July 1, 2020 and AB 1507 on January 1, 2020. These bills were introduced to correct deficiencies and close loopholes brought on by criticism that the law had not been keeping up with charter school operational oversight and the impacts charter schools have on public school districts. We are currently in the process of updating our submission processes to reflect these changes which will be brought to the board for review and approval, then posted to the district's website.

AB 1505 includes the following changes which were effective July 1, 2020:

- **New Petition Approval Criteria** - When considering whether to grant or deny a petition for a [new](#) charter school, a district may consider whether the charter school will serve the interests of the entire community in which the charter school is proposing to locate. Further, if a district meets certain financial criteria, the district may also consider whether or not it is positioned to absorb the fiscal impact of the proposed charter school. This criteria should limit the likelihood of any new charter petitions as well as the option of material revisions for those currently operational in our district boundaries.
- **Increase in Petition Review Timelines from 60 to 90 days** (initial and renewal)
 - A public hearing to consider the level of support for the petition must be held 60 days after the petition is submitted.
 - A second public hearing to act on a petition must be held 90 days after the petition is submitted.
 - Additionally, all staff recommendations and findings must be published at least 15 days before the public hearing where the board either approves or denies the petition.
 - Petitioners must also be given equal time to present their evidence and testimony to the board at the public hearing the petition will be approved or denied.
- **Renewal Criteria** - The new law establishes a three-tier system of charter renewal criteria based on a charter school's performance which is largely based on criteria from the State Dashboard. Under the tiered system:

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- a “high performing” charter school may be renewed for five to seven years
- a “middle performer” may be renewed for five years
- a “low performer”, generally, may not be renewed.
 - However, under certain conditions, a “low performing” charter school may be renewed for a two-year period.
 - Additionally, the requirement to consider increases in pupil academic achievement as the most important factor in determining whether to grant or deny a renewal **has been eliminated**.
- **Appeals Process** – The denial appeals process has been modified at both the county and state levels. For example, a petition submitted on appeal to a county board of education or the State Board of Education (SBE) containing “new or different material terms” will be immediately returned to be reconsidered by the district within 30 days.
 - Districts and county boards of education are required to prepare and submit an administrative record to the SBE upon request of the petitioners.
 - The SBE may only reverse the denial of a petition or renewal if it finds there was an “abuse of discretion” by the county or district, or both.
 - If a petition is approved on appeal to the SBE, either the district or county office of education will be designated as the authorizing authority, effectively eliminating the SBE as a charter school authorizer.
- **Nonclassroom-Based Charters** – A 2-year moratorium to add a new charter school offering nonclassroom-based instruction went into effect January 1, 2020 and runs through January 1, 2022. This will allow advocates time to study issues related to the establishment of nonclassroom-based charter schools, such as their operational practices and performance, and to make further recommendations to ensure students are receiving appropriate instruction.
- **Teacher Credentialing** – Previously, charter school teachers were only required to hold a state-approved credential if teaching a Core course. **Under the new law, all teachers hired after July 1, 2020 must have the appropriate credential for their certificated assignment regardless of whether they teach a core subject.**
 - All teachers employed at a charter school during the 2019-2020 school year without a credential will have until July 1, 2025 to obtain the appropriate credential for their certificated assignment.
 - By July 1, 2020, all charter school teachers must also obtain a certificate of clearance and satisfy the requirements for professional fitness under the Education Code. This means all charter school teachers will be required to submit their fingerprints and information regarding their background to the CTC, and obtain Department of Justice and Federal Bureau of Investigation clearances, through the CTC.

AB 1507 includes the following changes which were effective January 1, 2020:

- **Charter School Location** - Under prior law, a charter school that was unable to locate within the geographic boundaries of its authorizing district was permitted to establish one site outside the

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boundaries of the district, but within the county in which that district is located, if specific requirements were satisfied.

- AB 1507 eliminates this loophole and requires all charter schools to locate within the geographic boundaries of the authorizing district.
- A charter school lawfully established outside the boundaries before January 1, 2020, may continue to operate at the site until the charter school submits a renewal petition.
 - At that time, to continue operating at the same location, the charter school must either obtain written approval from the district where the charter school is operating, or submit a renewal petition to the district in which the charter school is located.
- **Resource Centers** - Under prior law, a nonclassroom-based charter school was able to establish a resource center in a county adjacent to the county in which the charter school was authorized, if certain conditions were met.
 - The new law eliminates the ability of a nonclassroom-based charter school to establish a resource center in an adjacent county.
 - A charter school that was lawfully operating a resource center outside the geographic boundaries of the authorizing district before January 1, 2020, may continue to operate at the site until the charter school submits a renewal petition
 - at which time the charter school must obtain written approval from the district where the resource center is located to continue operations at the same site.

Summit Tamalpais Charter Renewal Process

As previously mentioned, Summit Tamalpais is up for renewal as of June 30, 2021 and submitted their renewal petition today (September 25, 2020). Based on the legal timelines and new petition review criteria the following actions shall be initiated by the District for the Summit Tamalpais renewal:

1. Public hearing for Summit Tamalpais - **November 18, 2020**
 - a. The District's findings and recommendations must be posted by **November 3, 2020**
2. Public hearing and decision hearing - **December 16, 2020**

In addition to the timelines for charter school renewals changing the statutory date that a newly elected board member can take office has changed beginning in 2020. The new law requires that newly elected board members cannot take office until the second Friday in December, which this year is Friday, December 11th. This creates several unique situations where the statutory deadline for approval of the First Interim budget remains December 15th. This change means that for Districts likely will be in a situation where the outgoing board must approve the budget just days before the new board is seated. Due to these changes his renewal will cross over from our current board of education, which will be seated for the public hearing, to our new board configuration for the final decision which will be made the night they are seated as well.

Curriculum, Instruction & Assessment - Rubén Aurelio (Gabriel Chilcott & team)

Assessment (Gabriel Chilcott & Team): We are in the initial assessment window for all grades.

Assessments are a mix of synchronous and asynchronous in order to impact the direct instruction time as

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little as possible. The baseline Social Emotional Learning survey will go out asynchronously to all students in grades 3-12 beginning October 5.

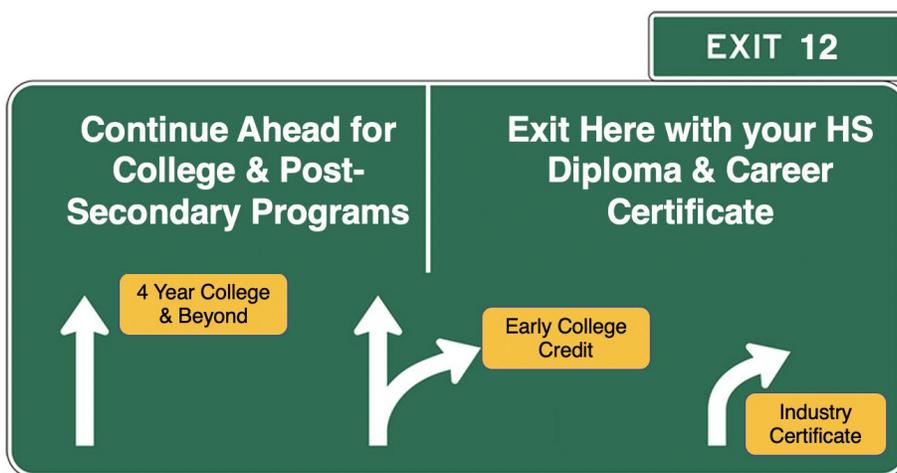
Science (John Iwawaki & Team): The middle school implementation of Amplify Science continues to go well. The STEM coach has been working closely with middle schools and K-8s to maximize the in class instruction and the utilization of the asynchronous resources in order to satisfy the needed minutes of instruction overall.

Math (Mark Lobaco & Team): The Math department is supporting the subject with ongoing Friday presentations such as: [K-12 Distance Learning Considerations for Math](#) and [K-1 Literacy and Math Assessment PD](#). The Math team recently [updated curriculum guides](#) in order to reflect the most important standards during distance learning.

Work Readiness via College and Career Pathways - Rubén Aurelio (Allison Huie & Team)

We often get questions asking if we have any programs that help students to be prepared for employment after graduation. The short answer is “Yes!” All of our College and Career Pathway programs are designed to help students develop work-ready skills and be ready to enter either the workforce or enter into some kind of postsecondary education upon graduation.

In the state's K-14 Pathway model, the goal is for students who exit Pathway programs at the HS level to have skills that would lead them to an entry-level job in their field of study. Those who exit after a 2-year post-secondary program would be able to enter into that industry at a mid-level skills job. We call this providing students multiple "on & off ramps" to career & higher education.



We use the [11 Elements of High Quality CTE](#) as a framework to guide the development and monitoring of each of our Pathway programs. The [CA Standards for Career Ready Practice](#) are embedded in our pathways programs throughout students' academic experience and the [CTE Model Curriculum standards](#)

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set the benchmark for education in the CTE courses. Each of the 17 Pathway programs we offer is representative of one of the [15 Industry Sectors](#) identified by the State of California as being areas of development and investment because there are high-need high-wage jobs within these sectors in our state.

Our goal is for all of our 17 different Pathway programs at our 7 different High Schools to be gold-standard programs featuring all 11 Elements of High-Quality CTE, including **at least one industry-recognized certificate**, and **at least one early college credit class**. This way, the student has (at least) 3 options when they graduate:

1. HS Diploma + Industry Certificate (Straight to Work)
2. HS Diploma + Industry Certificate + Early College Credit (Transition to community college pre-career program, ahead in units)
3. 4-year college & beyond.

This way, the CTE Pathways are preparing students to have the option to go straight to work, while also continuing to give them the opportunity to continue their education. (Or, commonly: use their entry-level job certificate from the pathway, to help them finance their continued education.)

An excellent example of this is the Health Pathway at De Anza High School.

1. **Industry Certificates:** All students receive HIPAA, CPR, & First Aid Training, which are key certificates for entry-level jobs in the health field.
2. **Early College Credit:** 12th graders complete two dual-enrolled courses toward the CCC Medical Assisting degree:
 1. MEDIC 151: Medical Terminology
 2. MEDIC 206: Electronic Health Records
3. Students are also prepared, if they choose, to apply to nursing programs, pre-medical programs, biotechnology programs, and a plethora of other careers in the health sciences that require additional college & graduate degree training.

If you or someone you know might be interested in supporting our College and Career Pathways programs, as a guest speaker, advisory committee member, resume reviewer, or otherwise, please complete this [quick form](#) to indicate your interest. District staff will then match your interests with opportunities in the schools.

State Funding for Career & Technical Education Programs - Rubén Aurelio (Allison Huie & Team)

College and Career Pathways staff submitted the annual application for California's Career and Technical Education grant funding. This program was established as a state education, economic, and workforce development initiative to provide pupils in Kindergarten through grade twelve with the knowledge and skills necessary to transition to employment and postsecondary education. Last year's [award](#) of \$1,093,981 supported CTE teacher salaries, program staff salaries, materials and supplies for students, and teacher professional development.

Hands-on-CTE during Distance Learning - Rubén Aurelio (Allison Huie & Team)

Career and Technical Education classes are known for being very hands-on in nature. One of the challenges that our teacher teams are working tirelessly to address is how to provide these types of

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learning experiences in a virtual learning format. This week’s example comes from Mr. Will Heyward, Lead Teacher in the Health Pathway at Pinole Valley High School. Mr. Heyward says, “In the normal Human Body Systems class, students would be working in the class on a miniature 2-foot tall skeleton adding various tissues and organs to show their understanding of the anatomy they are covering in class. Since they can not do this, I decided to create a laminated skeleton from three angles: front, back, and side.

Students will be asked to show their understanding of the anatomical position and structure of the various tissues and organs by building the organs and tissues from the three different angles. They will then take pictures of the structures and submit those to me for assessment.”

Mr. Heyward’s human anatomy project is just one of the many examples of the incredibly hard work teachers all across our District are doing to create engaging and enriching learning experiences for our students.



Independent Study Options in COVID-19 Era - Tony Wold

The California Department of Education made changes in the parameters for offering *traditional* independent study options for their students this school year, given that the enacted State Budget contemplates how public education will and could be provided in the wake of the coronavirus pandemic.

On Friday, July 31, 2020, the California Department of Education (CDE) added two answers to its list of [Distance Learning Frequently Asked Questions](#) relating to the provision of independent study. Specifically, the CDE added Item 16 under “General Questions” and Item 24 under “Virtual Schools,” as follows:

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Question: Can students avail themselves of an independent study program rather than distance learning in the 2020–21 school year?

Answer: The following requirements would need to be met when offering independent study programs and an LEA will need to ensure that the LEA still meets the statutory distance learning requirements in order to avoid any audit penalties. These requirements include the following:

- Adopt a learning continuity plan and attendance plan that includes plans for the distance learning program
- Track and report daily participation
- Maintain a weekly engagement record for each student documenting synchronous or asynchronous instruction for each whole or partial day of distance learning, verifying daily participation, and tracking assignments
- Schedule students for a minimum days' worth of assignments each day as certified to by a certificated employee
- Develop written procedures for tiered reengagement strategies for all pupils who are absent for more than three school days or 60% of the instructional days in a school week
- Provide either daily live interaction or develop an alternative plan for frequent live interaction

Question: Can a school district open a virtual school or an independent study school to serve all students through distance learning?

Answer: Independent study or virtual programs offered as a form of independent study at school districts should be offered as a program and are not a school type.

- Although for the 2020–21 school year, a school district is able to meet its instructional day requirements through distance learning and the annual instructional time requirements have been temporarily suspended, the requirement that instruction be under the immediate supervision of a certificated employee to be included in instructional day and minute calculations and the requirement that all students be offered specific annual instructional minutes will be back in effect in 2021–22.
- These requirements are both district level and site level requirements, which carry a financial penalty for not meeting them.
- The CDE would advise against opening a virtual or independent study school because school districts can put themselves at risk for potential audit findings and/or fiscal penalties in future years by operating a virtual school.

Summary analysis based upon the conflicts between Senate Bill 98 and previous regulations is that **distance learning and independent study are not interchangeable**. While there is commonality between the two programs, the distance learning requirements established in Part 24.5, of the Education Code beginning with Section 43500 are different from the requirements of independent study. In order to establish an existing independent study program as a distance learning program for 2020–21, that independent study program would need to meet **both independent study requirements and distance learning requirements**.

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Thus, while the options remain available for students and districts, the CDE reminds LEAs that they must continue to meet the distance learning requirements established in Senate Bill 98 (Chapter 24, Statutes of 2020) and that lack of compliance may result in audit penalties. In this case, the key component of Senate Bill 98 is the requirement for daily live interaction with both a teacher and other students, even in the independent study model.

The simple fact is that this year the State of California has been consistently **placing roadblocks to student options** such as maintaining the requirement of immunizations to enroll students, increasing independent study to require other requirements, and requiring 180 days of live instruction each of which will reduce the amount of funding that the State has to provide to schools. We continue to advocate for other options to serve our students within the regulations that the State placed on all school districts in California.