

July 14, 2011

The Honorable Stephen T. Kroyer  
Presiding Judge  
Superior Court of the State of California  
County of Napa  
825 Brown Street  
Napa, CA 94559

**FILED**

**JUL 27 2011**

Clerk of the Napa Superior Court

By: C. Bauman  
Deputy

Dear Judge Kroyer:

This letter is written as a joint response from the Napa County Office of Education (NCOE), the Napa Valley Unified School District, the St. Helena Unified School District, and the Calistoga Joint Unified School District to the findings and recommendations provided by the Napa County Grand Jury in its 2010-2011 report, *KEEPING TRACK OF NAPA COUNTY NON-TRADITIONAL OR ALTERNATIVE HIGH SCHOOL STUDENTS*.

**Summary/Background:**

As stated in the opening of the Grand Jury's report, "In order to fulfill the Grand Jury's mandate to investigate all local government agencies, to assure they are being administered efficiently, honestly, and the best interest of Napa County residents, the 2010-2011 Grand Jury investigated the Napa County Office of Education Juvenile Court and Community Schools, sometimes known as alternative schools or non-traditional schools." A joint response to the resulting report has been developed because the focus of the Grand Jury's findings and recommendations deal with information sharing among the agencies named, and the issues raised by the recommendations are the same for all the agencies.

**Responses to the 2010-2011 Grand Jury Findings and Recommendations:**

**Finding F1:**

Napa County school districts provide alternative educational options for high school students.

**Response to F1:** We agree with the finding.

**Finding F2:**

Individual schools within a district, as well as NCOE, only have access to their own district's on-line databases of student records.

**Response to F2:** We disagree partially with the finding. As stated, the finding is correct in that the districts and NCOE do not share access to their respective student information systems with each other. However, access is shared across schools within a given district (and within NCOE) as once a student transfers to a new school within a district, the new school gains access to the students records within the system.

**Recommendation R1:**

All school districts in Napa County provide NCOE with "read-only" access to their individual on-line student databases.

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**Recommendation R2:**

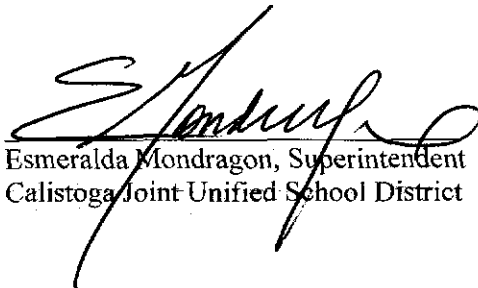
NCOE provide “read-only” access to all school districts in Napa County to their on-line student databases.

**Response to R1 and R2:** The recommendation will not be implemented because it is not warranted. The intent of the recommendations – sharing student records through an online database – is being implemented through the State’s CALPADS initiative. The ability for an individual outside a district to view student information within another district Student Information System (SIS) would require an understanding of the peculiarities of each system, the custom data elements and definitions, assessment data, etc., which are not standard amongst districts. The State California Longitudinal Pupil Achievement Data System (CALPADS) initiative is intended to address these issues and as it develops will enable accurate and timely data transfer among districts. Napa County Local Education Agencies (LEAs) have a strong data-driven culture. The districts and NCOE were early adopters of the California School Information Services (CSIS) program and have been actively participating in the CALPADS initiative since its inception. Napa LEAs continuously strive to balance the interest in high quality, secure data systems with the increasing demands for accessibility, and are guided by the best practices identified through close relationships with the California Department of Education (CDE) and the National Center for Education Statistics (NCES). We believe that CALPADS will give all Napa LEAs “read only” access to each others’ student information.


In terms of the specific recommendations – that Napa LEAs provide each other with “read only” access to their respective student databases, there are several reasons that make the State CALPADS initiative a better response than developing local read only access:

- Napa LEAs are already using CALPADS to access student records related to student enrollment history and past English Language Learner designations. In the future the system will also allow access to student test scores, grades and transcripts.
- The district databases are electronic and stored within a server inside each district’s network. Outside access to this would require opening ports in the network firewall, thereby adding workload and security risks.
- The expansion of access to confidential student information to users outside a district increases the risk of unintended consequences such as privacy violation, and possible violations of legal restrictions such as FERPA.
- Each district has a different version of the student database application, different custom data elements and definitions within the application, and different systems and timelines for upgrades and patches. Synchronizing the various implementations would require identification and standardization of the components and features of the system. This would take time and cost resources to accomplish.
- When a student is transferred to an NCOE alternative school from a district, in addition to data in the district database, there are additional mandatory cover sheets, discipline contracts, incident reports and other narrative documentation which must be included that is not a part of the student database. Currently, everything is faxed to NCOE from the district within one business day from the time of the NCOE request for records. The current process has been found to be effective and thorough by both NCOE and the districts in regard to the student’s alternative school placement interests.


This response is jointly submitted by the Superintendent's of the Napa County Office of Education, the Napa Valley Unified School District, the St. Helena Unified School District, and the Calistoga Joint Unified School District on this 14<sup>th</sup> day of July, 2011.



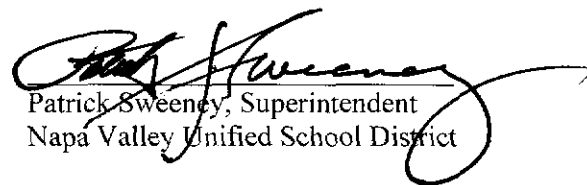
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