



Oxford Elementary School

1222 University Ave • Berkeley • 5106446300 • Grades K-5

Beth Rhine, Principal
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2019-20 School Accountability Report Card Published During the 2020-21 School Year



Berkeley Unified School District

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Brent Stephens, Ed.D.
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School Description

Oxford Elementary School moved to its new site on 1222 University Avenue in the Fall of 2020. Oxford is a small school and has created a tight-knit community where children feel cared for and supported, academically and emotionally. We have approximately 260 students, K-5, with two classes per grade level. Our talented staff is dedicated to the academic achievement, social and emotional growth, and general health of every child. In addition to a strong classroom curriculum, students enjoy a weekly library visit for selecting books to read at home. We strive to offer a well-rounded program for all of our students. We are committed to recognizing and celebrating the diversity of our community by having multicultural performances, music assemblies, the Annual Martin Luther King Jr. Oratorical Event, class plays, and more.

Our highly trained teachers work collaboratively to provide a challenging, engaging, and equitable learning environment for all students and are skilled at bringing out the best in everyone. In addition to our core program of reading, writing, mathematics, science and social studies, we also provide art, music, physical education, and gardening. All students in grades three, four, and five have personal chrome books to use throughout the year. Students use their chrome books to practice keyboarding, create stories, write essays and reports, and practice and enrich their language arts and math skills with programs such as Khan Academy, ZEARN, Flocabulary, NewsELA, and RAZ Kids. All students in the school have access to listening to books online with our Tales2Go program. Students have access to all of these programs at home through our Oxford Library Website.

At Oxford, there is an intervention team, or RTI team, that meets weekly to look at the unique needs of every individual student in the school, academically and emotionally. We provide services to many students with help from our special education teachers, literacy coach/teacher, math coach, speech pathologist, counselor, UC Berkeley tutors and mentors. In addition to reading, writing and math intervention, the intervention team also discusses ways to build in academic challenge opportunities for students who are at or above grade level. Our after school program, LEARNS, serves up to two thirds of our school population, providing homework help, in addition to various enrichment classes like cooking, chess, organized sports and drama. Oxford holds bi-monthly community meetings, where we talk about the Toolbox and School Rules, have class performances and songs, and celebrate our community with Ally Awards!

We have very strong parent and community involvement in our classrooms and throughout the school. Our active PTA sponsors community events and fundraisers such as the Harvest Fair, Winter Fair, Read-a-thon, Caregiver Fundraising Party, Raffle and Spring Dance, and Talent Show. Parent and community volunteers work in the classroom, garden, cafeteria, and schoolyard. There are other ways for parents/guardians to get involved, too. We have an active ELAC (English Language Advisory Committee), as well as an SSC (School Site Council).

Beth Rhine,
Principal

About the SARC

By February 1 of each year, every school in California is required by state law to publish a School Accountability Report Card (SARC). The SARC contains information about the condition and performance of each California public school. Under the Local Control Funding Formula (LCFF) all local educational agencies (LEAs) are required to prepare a Local Control and Accountability Plan (LCAP), which describes how they intend to meet annual school-specific goals for all pupils, with specific activities to address state and local priorities. Additionally, data reported in an LCAP is to be consistent with data reported in the SARC.

- For more information about SARC requirements and access to prior year reports, see the California Department of Education (CDE) SARC web page at <https://www.cde.ca.gov/ta/ac/sa/>.
- For more information about the LCFF or the LCAP, see the CDE LCFF webpage at <https://www.cde.ca.gov/fg/aa/lc/>.
- For additional information about the school, parents/guardians and community members should contact the school principal or the district office.

2019-20 Student Enrollment by Grade Level

Grade Level	Number of Students
Kindergarten	41
Grade 1	44
Grade 2	35
Grade 3	40
Grade 4	57
Grade 5	46
Total Enrollment	263

2019-20 Student Enrollment by Group

Group	Percent of Total Enrollment
Black or African American	17.5
Asian	6.1
Filipino	1.1
Hispanic or Latino	17.1
Native Hawaiian or Pacific Islander	0.4
White	39.9
Two or More Races	17.9
Socioeconomically Disadvantaged	30.4
English Learners	9.5
Students with Disabilities	11
Homeless	2.3

A. Conditions of Learning

State Priority: Basic

The SARC provides the following information relevant to the State priority: Basic (Priority 1):

- Degree to which teachers are appropriately assigned and fully credentialed in the subject area and for the pupils they are teaching;
- Pupils have access to standards-aligned instructional materials; and
- School facilities are maintained in good repair

Teacher Credentials for Oxford Elementary	18-19	19-20	20-21
With Full Credential	20	19	25
Without Full Credential	1	0	0
Teaching Outside Subject Area of Competence	0	0	0

Teacher Credentials for Berkeley Unified	18-19	19-20	20-21
With Full Credential	♦	♦	797
Without Full Credential	♦	♦	56
Teaching Outside Subject Area of Competence	♦	♦	0

Teacher Misassignments and Vacant Teacher Positions at Oxford Elementary School

Indicator	18-19	19-20	20-21
Teachers of English Learners	0	0	
Total Teacher Misassignments*	0	0	
Vacant Teacher Positions	0	0	

Note: "Misassignments" refers to the number of positions filled by teachers who lack legal authorization to teach that grade level, subject area, student group, etc.
*Total Teacher Misassignments includes the number of Misassignments of Teachers of English Learners.

Quality, Currency, Availability of Textbooks and Instructional Materials (School Year 2020-21)

Williams legislation calls for the schools to have enough books in core classes for all students and asks districts to reveal whether those books are presenting information outlined in the California content standards. Textbook materials are adopted by the school board following a rotating adoption cycle for subject specific state adopted textbooks and instructional materials.

Textbooks and Instructional Materials

Year and month in which data were collected: January 2021

Core Curriculum Area	Textbooks and Instructional Materials/Year of Adoption
Reading/Language Arts	Teachers College Reading and Writing Project Adopted 2011, Fast Track Phonics Adopted 2018 The textbooks listed are from most recent adoption: Yes Percent of students lacking their own assigned textbook: 0%
Mathematics	A Story of Units (Eureka Math) Adopted 2013 The textbooks listed are from most recent adoption: Yes Percent of students lacking their own assigned textbook: 0%
Science	Full Option Science Sysytem (FOSS) (Foss Delta Education) Adopted in 2007; NGSS FOSS kits 2019 The textbooks listed are from most recent adoption: Yes Percent of students lacking their own assigned textbook: 0%
History-Social Science	TCI History Curriculum Pilot 2020-21 The textbooks listed are from most recent adoption: Yes Percent of students lacking their own assigned textbook: 0%

Note: Cells with N/A values do not require data.

School Facility Conditions and Planned Improvements (Most Recent Year)

The district administers a scheduled maintenance program to ensure that all classrooms and facilities are well maintained and in good repair. A work order process alerts district personnel of any maintenance needed to be performed and ensures that emergencies are given the highest priority.

Safety issues are the top priority for Maintenance and Operations. District maintenance supervisors inspect school sites continually and complete repairs in a timely manner. They use a work order process to ensure an efficient, prioritized repair process. The district maintenance staff has indicated that 100% of all toilets on school grounds are in working order.

To determine the condition of our facilities, our district sent experts from our facilities team to perform an inspection using a survey called the Facilities Inspection Tool, which is issued by the Office of Public School Construction.

Based on that survey, we've answered the questions you see on this report. Please note that the information reflects the condition of our buildings as of the date of the report. Since that time, those conditions may have changed.

Date of Last Inspection: August 20, 2020

School Facility Good Repair Status (Most Recent Year)

Using the **most recently collected** FIT data (or equivalent), provide the following:

- Determination of repair status for systems listed
- Description of any needed maintenance to ensure good repair
- The year and month in which the data were collected
- The rate for each system inspected
- The overall rating

Year and month in which data were collected: September 2020

System Inspected	Repair Status	Repair Needed and Action Taken or Planned
Systems: Gas Leaks, Mechanical/HVAC, Sewer	Good	No apparent problems
Interior: Interior Surfaces	Good	No apparent problems
Cleanliness: Overall Cleanliness, Pest/ Vermin Infestation	Good	No apparent problems

System Inspected	Repair Status	Repair Needed and Action Taken or Planned
Electrical: Electrical	Good	No apparent problems
Restrooms/Fountains: Restrooms, Sinks/ Fountains	Good	No apparent problems
Safety: Fire Safety, Hazardous Materials	Good	No apparent problems
Structural: Structural Damage, Roofs	Good	No apparent problems
External: Playground/School Grounds, Windows/ Doors/Gates/Fences	Good	No apparent problems
Overall Rating	Good	

B. Pupil Outcomes

State Priority: Pupil Achievement

The SARC provides the following information relevant to the State priority: Pupil Achievement (Priority 4):

- **Statewide assessments** (i.e., California Assessment of Student Performance and Progress [CAASPP] System, which includes the Smarter Balanced Summative Assessments for students in the general education population and the California Alternate Assessments [CAAs] for English language arts/literacy [ELA] and mathematics given in grades three through eight and grade eleven. Only eligible students may participate in the administration of the CAAs. CAAs items are aligned with alternate achievement standards, which are linked with the Common Core State Standards [CCSS] for students with the most significant cognitive disabilities); and
- The percentage of students who have successfully completed courses that satisfy the requirements for entrance to the University of California and the California State University, or career technical education sequences or programs of study.

CAASPP Test Results in ELA and Mathematics for All Students Grades Three through Eight and Grade Eleven Percentage of Students Meeting or Exceeding the State Standard

Subject	School 18-19	School 19-20	District 18-19	District 19-20	State 18-19	State 19-20
ELA	61	N/A	65	N/A	50	N/A
Math	62	N/A	60	N/A	39	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-30-20 was issued which waived the requirement for statewide testing for the 2019-2020 school year.

Note: Percentages are not calculated when the number of students tested is ten or less, either because the number of students in this category is too small for statistical accuracy or to protect student privacy.

Note: ELA and mathematics test results include the Smarter Balanced Summative Assessment and the CAA. The "Percent Met or Exceeded" is calculated by taking the total number of students who met or exceeded the standard on the Smarter Balanced Summative Assessment plus the total number of students who met the standard (i.e., achieved Level 3-Alternate) on the CAAs divided by the total number of students who participated in both assessments.

CAASPP Test Results in Science for All Students Grades Five, Eight, and High School Percentage of Students Meeting or Exceeding the State Standard

Subject	School 18-19	School 19-20	District 18-19	District 19-20	State 18-19	State 19-20
Science	40	N/A	47	N/A	30	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-30-20 was issued which waived the requirement for statewide testing for the 2019-2020 school year.

Note: The new California Science Test (CAST) was first administered operationally in the 2018-2019 school year.

State Priority: Other Pupil Outcomes

The SARC provides the following information relevant to the State priority: Other Pupil Outcomes (Priority 8):

- Pupil outcomes in the subject areas of physical education.

2019-20 Percent of Students Meeting Fitness Standards

Grade Level	4 of 6	5 of 6	6 of 6
5	N/A	N/A	N/A
7	N/A	N/A	N/A
9	N/A	N/A	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-56-20 was issued which waived the requirement to administer the physical fitness performance test for the 2019-2020 school year.

CAASPP Test Results in Science by Student Group
Grades Three through Eight and Grade Eleven (School Year 2019-2020)

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
All Students	N/A	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A	N/A
Black or African American	N/A	N/A	N/A	N/A	N/A
American Indian or Alaska Native	N/A	N/A	N/A	N/A	N/A
Asian	N/A	N/A	N/A	N/A	N/A
Filipino	N/A	N/A	N/A	N/A	N/A
Hispanic or Latino	N/A	N/A	N/A	N/A	N/A
Native Hawaiian or Pacific Islander	N/A	N/A	N/A	N/A	N/A
White	N/A	N/A	N/A	N/A	N/A
Two or More Races	N/A	N/A	N/A	N/A	N/A
Socioeconomically Disadvantaged	N/A	N/A	N/A	N/A	N/A
English Learners	N/A	N/A	N/A	N/A	N/A
Students with Disabilities	N/A	N/A	N/A	N/A	N/A
Students Receiving Migrant Education Services	N/A	N/A	N/A	N/A	N/A
Foster Youth	N/A	N/A	N/A	N/A	N/A
Homeless	N/A	N/A	N/A	N/A	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-30-20 was issued which waived the requirement for statewide testing for the 2019-2020 school year.

CAASPP Test Results in ELA by Student Group
Grades Three through Eight and Grade Eleven (School Year 2019-2020)

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
All Students	N/A	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A	N/A
Black or African American	N/A	N/A	N/A	N/A	N/A
American Indian or Alaska Native	N/A	N/A	N/A	N/A	N/A
Asian	N/A	N/A	N/A	N/A	N/A
Filipino	N/A	N/A	N/A	N/A	N/A
Hispanic or Latino	N/A	N/A	N/A	N/A	N/A
Native Hawaiian or Pacific Islander	N/A	N/A	N/A	N/A	N/A
White	N/A	N/A	N/A	N/A	N/A
Two or More Races	N/A	N/A	N/A	N/A	N/A
Socioeconomically Disadvantaged	N/A	N/A	N/A	N/A	N/A
English Learners	N/A	N/A	N/A	N/A	N/A
Students with Disabilities	N/A	N/A	N/A	N/A	N/A
Students Receiving Migrant Education Services	N/A	N/A	N/A	N/A	N/A
Foster Youth	N/A	N/A	N/A	N/A	N/A
Homeless	N/A	N/A	N/A	N/A	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-30-20 was issued which waived the requirement for statewide testing for the 2019-2020 school year.

**CAASPP Test Results in Mathematics by Student Group
Grades Three through Eight and Grade Eleven (School Year 2019-2020)**

Student Group	Total Enrollment	Number Tested	Percent Tested	Percent Not Tested	Percent Met or Exceeded
All Students	N/A	N/A	N/A	N/A	N/A
Male	N/A	N/A	N/A	N/A	N/A
Female	N/A	N/A	N/A	N/A	N/A
Black or African American	N/A	N/A	N/A	N/A	N/A
American Indian or Alaska Native	N/A	N/A	N/A	N/A	N/A
Asian	N/A	N/A	N/A	N/A	N/A
Filipino	N/A	N/A	N/A	N/A	N/A
Hispanic or Latino	N/A	N/A	N/A	N/A	N/A
Native Hawaiian or Pacific Islander	N/A	N/A	N/A	N/A	N/A
White	N/A	N/A	N/A	N/A	N/A
Two or More Races	N/A	N/A	N/A	N/A	N/A
Socioeconomically Disadvantaged	N/A	N/A	N/A	N/A	N/A
English Learners	N/A	N/A	N/A	N/A	N/A
Students with Disabilities	N/A	N/A	N/A	N/A	N/A
Students Receiving Migrant Education Services	N/A	N/A	N/A	N/A	N/A
Foster Youth	N/A	N/A	N/A	N/A	N/A
Homeless	N/A	N/A	N/A	N/A	N/A

Note: Cells with N/A values do not require data.

Note: The 2019-2020 data are not available. Due to the COVID-19 pandemic, Executive Order N-30-20 was issued which waived the requirement for statewide testing for the 2019-2020 school year.

C. Engagement

State Priority: Parental Involvement

The SARC provides the following information relevant to the State priority: Parental Involvement (Priority 3):

- Efforts the school district makes to seek parent input in making decisions for the school district and each school site

Opportunities for Parental Involvement (School Year 2020-21)

Parents/caregivers are welcomed partners at Oxford Elementary School. We have an active School Site Council, SSC, that meets every month. Parents/caregivers also serve on the English Learner Advisory Committee, the PTA, and represent our school on district advisory committees. We encourage parents/caregivers to volunteer in classrooms. Volunteers can tutor and read with students, provide additional homework assistance, and support the classroom teachers. Parents/caregivers can volunteer on the schoolyard, office, cafeteria, school garden, art class, and science class. They are welcome to attend all school performances and events including community meetings, and chaperone field trips. Our involved parents/caregivers raise funds to support enrichment classes, classroom aide support, a counseling program, art classes, classroom supplies, school-wide events and more. Our Office of Family Engagement and Equity provides parent/caregiver support and interaction that contributes to a wonderful partnership between home and school, benefiting the children at Oxford Elementary. We encourage parents/caregivers who are interested in volunteering to notify the classroom teacher or the principal. Interested volunteers can also contact our Office of Family Engagement and Equity Specialist, Carol Perez, at 510-849-7396/ carolynperez@berkeley.net to learn about more opportunities to get involved.

State Priority: School Climate

The SARC provides the following information relevant to the State priority: School Climate (Priority 6):

- Pupil suspension rates;
- Pupil expulsion rates; and
- Other local measures on the sense of safety.

School Safety Plan (School Year 2020-2021)

Oxford moved to 1222 University Avenue after recognizing the safety concerns at the original site, in the case of a major seismic event. The new Oxford site (previously REALM Charter School and Berkeley High West Campus) was completely renovated and remodeled to be an elementary school. Facilities include 14 permanent classrooms, one library, two staff rooms, one multipurpose room, two teacher resource rooms, a counseling room, three small offices, and a reading intervention room. The facility strongly supports teaching and learning through its classroom and playground space.

The safety of students and staff is our primary concern. During lunch, recesses, and before-and-after school, staff members, administrators, and instructional aides supervise students and school grounds to ensure an orderly, safe environment. The school is always fully compliant with all rules, laws, and regulations concerning state earthquake standards and hazardous materials. Earthquake and fire drills are held monthly, and intruder drills are held at least twice a year.

We have an active Safety Committee at Oxford. The Safety Committee is working to support our emergency preparedness by inventorying the emergency bin, updating procedures and organizing a school-wide earthquake drill to be held in the Spring 2022. The City of Berkeley Emergency has been involved in providing training to staff related to emergency planning and earthquake drills.

Safety procedures, including elements of our Comprehensive Safe School Plan, are reviewed with school and district staff at the start of each school year. The plan was last updated and reviewed with school staff in February 2021.

Suspensions and Expulsions

(data collected between July through June, each full school year respectively)

Rate	School 2017-18	School 2018-19	District 2017-18	District 2018-19	State 2017-18	State 2018-19
Suspensions	0.0	0.0	1.9	1.4	3.5	3.5
Expulsions	0.0	0.0	0.0	0.0	0.1	0.1

Suspensions and Expulsions for School Year 2019-2020 Only

(data collected between July through February, partial school year due to the COVID-19 pandemic)

Rate	School 2019-20	District 2019-20	State 2019-20
Suspensions			0.4
Expulsions			0.1

Note: The 2019-2020 suspensions and expulsions rate data are not comparable to prior year data because the 2019-2020 school year is a partial school year due to the COVID-19 crisis. As such, it would be inappropriate to make any comparisons in rates of suspensions and expulsions in the 2019-2020 school year compared to prior years.

D. Other SARC Information

The information in this section is required to be in the SARC but is not included in the state priorities for LCFF.

Ratio of Pupils to Academic Counselor (School Year 2019-2020)

Title	Ratio
Academic Counselor*	0

*One full time equivalent (FTE) equals one staff member working full time; one FTE could also represent two staff members who each work 50 percent of full time.

Student Support Services Staff (School Year 2019-2020)

Title	Number of Full-Time Equivalent (FTE)
Counselor (Social/Behavioral or Career Development)	
Library Media Teacher (Librarian)	
Library Media Services Staff (Paraprofessional)	
Psychologist	
Social Worker	
Nurse	
Speech/Language/Hearing Specialist	0.2
Resource Specialist (non-teaching)	
Other	3.6

*One Full Time Equivalent (FTE) equals one staff member working full time; one FTE could also represent two staff members who each work 50 percent of full time.

Average Class Size and Class Size Distribution (Elementary)

Grade Level	2017-18	2017-18	2017-18	2017-18	2018-19	2018-19	2018-19	2018-19	2019-20	2019-20	2019-20	2019-20
	Average Class Size	# of Classes* Size 1-20	# of Classes* Size 21-32	# of Classes* Size 33+	Average Class Size	# of Classes* Size 1-20	# of Classes* Size 21-32	# of Classes* Size 33+	Average Class Size	# of Classes* Size 1-20	# of Classes* Size 21-32	# of Classes* Size 33+
K	21		2		23		2		21	1	1	
1	20	2			21	1	1		22		2	
2	19	3			21	1	1		18	2		
3	21		4		29	3		1	20	2		
4	38		2	1	26	2		1	29		2	
5	35	2	2	1	35	5	2	1	23		2	
Other**												

*Number of classes indicates how many classes fall into each size category (a range of total students per class).

** "Other" category is for multi-grade level classes.

Professional Development (Most Recent Three Years)

Measure	2018-19	2019-20	2020-21
Number of school days dedicated to Staff Development and Continuous Improvement	3	3	3

TK-8 teachers participated in an optional two weeks of professional development during the summer (July-August 2020). The sessions were geared towards preparing teachers for distance learning. Additionally, teachers engaged in 3 full days of professional development during the 2020-21 school year. TK-8 teachers participate in dedicated collaboration 5 partial day professional development, each session 2 hours in length. Every TK-8 site has a Literacy Coach Equity Lead, and a Math Teacher Leader to support teachers in reflecting and improving math and literacy teaching skills through co-teaching and direct professional development at staff meetings. Professional development in TK-8 has explicitly focused on best practices to engage and empower students via distance learning and abolitionist and culturally responsive teaching. New teachers participate in a rigorous District Teacher Induction program. Teacher-initiated professional development is supported through local funds earmarked for this purpose and through school site funds, as well.

FY 2018-19 Teacher and Administrative Salaries

Category	District Amount	State Average for Districts In Same Category
Beginning Teacher Salary	\$43,769	\$49,782
Mid-Range Teacher Salary	\$73,321	\$76,851
Highest Teacher Salary	\$90,981	\$97,722
Average Principal Salary (ES)	\$120,906	\$121,304
Average Principal Salary (MS)	\$126,902	\$128,629
Average Principal Salary (HS)	\$145,855	\$141,235
Superintendent Salary	\$248,416	\$233,396

Percent of District Budget	District Amount	State Average for Districts In Same Category
Teacher Salaries	32.0	33.0
Administrative Salaries	6.0	6.0

* For detailed information on salaries, see the CDE Certificated Salaries & Benefits webpage at www.cde.ca.gov/ds/fd/cs/.

Types of Services Funded

The Berkeley Unified School District has used federal funding to provide supplemental alternative services and supplemental instructional materials provided to the Title I schools that support and assist Title I students. Alternative support includes tutoring, intervention curriculum and supplemental instructional supplies for targeted Title I students to close the achievement gap.

DataQuest

DataQuest is an online data tool located on the CDE DataQuest web page at <https://dq.cde.ca.gov/dataquest/> that contains additional information about this school and comparisons of the school to the district and the county. Specifically, DataQuest is a dynamic system that provides reports for accountability (e.g., test data, enrollment, high school graduates, dropouts, course enrollments, staffing, and data regarding English learners).

California School Dashboard

The California School Dashboard (Dashboard) <https://www.caschooldashboard.org/> reflects California's new accountability and continuous improvement system and provides information about how LEAs and schools are meeting the needs of California's diverse student population. The Dashboard contains reports that display the performance of LEAs, schools, and student groups on a set of state and local measures to assist in identifying strengths, challenges, and areas in need of improvement.

FY 2018-19 Expenditures Per Pupil and School Site Teacher Salaries

Level	Total	Restricted	Unrestricted	Average Teacher Salary
School Site	\$11845.13	\$3189.40	\$8655.73	\$84136.76
District	N/A	N/A	\$11211.76	\$76,974
State	N/A	N/A	\$7,750	\$79,209

Percent Differences	Unrestricted	Average Teacher Salary
School Site/District	-25.7	8.9
School Site/ State	11.0	6.0

Note: Cells with N/A values do not require data.