WESTAMERICA BANK

Jennifer J. Johnson
Secretary, Board of Governors
Federal Reserve System
20th street and Constitution, Av. NW
Washington, DC 20551

Regulation BB, Docket No. R-1225 March 23, 2005

Subject: Comments on Proposed Rule Making to the Community Reinvestment Act

Westamerica Bank would like to comment on the proposed rule making. The bank is in a unique position to comment on changes concerning the definition of community development in rural areas, since the majority of its branch offices serve what are called rural communities. The bank has been fortunate enough to have served these areas for a number of years and we believe we have gained an in-depth understanding of their needs. The bank has approximately 89 branch offices serving 22 counties throughout much of Northern and Central California. By far, the majority of these counties are what would be considered rural. For example, the bank serves the Central Valley, which comprises a group of counties that are still largely agriculturally-based. In eight rural areas, we are the only bank available in the community. We have learned frorn years of service to these communities that in many respects their needs are different frorn the needs of more urban communities. More importantly, we have learned that the resources these communities use to meet to the needs of their populations are very different from larger metropolitan communities. The bank would like to assert that there are good reasons to expand the definition of community development in rural America.

The bank agrees with the proposed rule making that the rates of poverty in rural America are frequently understated by simply using median family income figures. In fact, use of these factors frequently distorts the poverty rate in these rural communities. For example, the bank has a significant branch presence in Lake County, California. Lake County is mostly rural, with three towns and a number of unincorporated areas. The county has no significant businesses, and its agricultural base is very limited. Lake County has 12 census tracts. Two are upper-income, six are middle-income, only four are considered moderate- income, and none are considered low-income tracts. At first glance, this community appears to be relatively prosperous. However, these statistics mask the true rate of poverty in the region. According to the 2000 census data, 25% of the households earn less than $14,999, and 43% earn less than $24,999.

What is startling is the fact that Lake County is adjacent to Sonoma County, which is a primary commuter county for the Bay Area. While these counties are geographically similar, there are vast economic differences between the two. While the 2004 median family income in Lake County is $42,700, it is just a little more than half that of Sonoma County, which is $74,600. In Sonoma County, 9.5% of households have children in poverty compared to 29.3% in Lake County (2000 census).

This disparity in poverty has been fueled by the sharp increase in housing prices and housing rental rates throughout the Bay Area. Escalating prices have increased much faster than the incomes of low- and moderate-income households. This has created an economic environment in which LMI households have become economic refugees, forced to move to the rural areas (such as Lake County) to find affordable housing. The end result is a job/housing mismatch. Many of these families simply cannot afford to live in the same community where they can find employment. Lake County has become the low-income community for the region. The plight of those moving to Lake County in search of housing only worsens, because there are many fewer employment opportunities in Lake County.

Communities such as Lake County, as well as others in the Central Valley, have high unemployment. Without employment, these households rely heavily on local social services. We have found many of these counties do not have the school, housing, employment, health or social structures to cope with the increase. Therefore, we feel that any type of loan, investment or service we can provide to these rural counties will be of significant benefit.

The most significant reason to expand the definition of Community Development in rural areas is to recognize that rural counties must utilize alternative services to help the LMI population. Rural communities, such as Lake County, have become resourceful in helping their large LMI populations. But they do so in ways very different than envisioned in the current definition of CRA Services.

For example, local fire districts host public auctions. Individuals and businesses donate items, which are auctioned off in large street fair celebrations. The proceeds help to fund food banks, shelters and after-school activities. Banks frequently serve as catalysts in these fundraising activities, by placing signs, operating the display booths, and soliciting donations. Without such fundraising events, these organizations would not receive the resources they need to sustain their programs. Expanding the definition of community development to include soliciting donations, collecting money at booths, and promoting donation fairs would significantly help these communities.

Similarly, these same organizations host neighborhood cleanups, where people volunteer to renovate and repair senior housing, clean up public areas, and perform other types of volunteer labor. Again, these activities are a significant benefit to the community. Local financial institutions are often instrumental in organizing, publicizing and participating in these events.

Unlike their more fortunate urban and suburban counterparts, rural areas simply do not have well-funded nonprofit organizations that provide resources and services. Funding school programs, shelters and food banks is all done at a grass roots level. For example, a large rural health clinic serving two Northern California rural counties provides the only health services for LMI individuals within a 90-mile radius. A significant portion of its operations is funded by a yearly charity golf tournament. The entire community comes out to sell tickets and promote the event. The bank plays an important role, with many individuals volunteering their services to organize, promote and staff the event. Some agencies would not consider such activities as selling tickets, operating a booth, and soliciting for sponsors as meeting the community

development definition. However, such activities raise the conscience of the entire community and provide funding for a much- needed service.

The quality of schools is an area that provides the most disturbing statistical contrast, when it comes to contrasting rural vs. urban/suburban. Rural schools simply do not have the resources that suburban and urban schools have. Again, rural areas must use innovative techniques to find funding for basic services. For example, one rural school raised funds to buy a school bus by organizing a series of pancake breakfasts sales, sponsored by several banks, a women's club and a hardware store.

The standardized test scores for high school students in California's rural areas are much lower than more urban and suburban areas. For example, 77.1% of the students in Lake County qualify for the compensatory education program for low-income students as compared to 21.5% in Sonoma County (see attached).

By changing the definition of community development to include a wider range of activities, the Board will be opening up new opportunities for all the banks in all the small towns in rural America. More importantly, since Community Development is the CRA's most successful concept, a change in definition will motivate institutions to find and perform even more services. Expanding the definition to include activities to build rural housing, promote job creation and improve social services would encourage all institutions to expand their service to their communities in new ways.

We suggest this change would include all activities designed to promote education and improve the schools. For example, buying a bond to remodel a school in a middle income census tract would help Lake County.

Lastly, Community Development should include activities that assist the non-English-speaking population in gaining access to business, social and civic services. Our bank serves a number of rural Central Valley communities where the majority population is non- English-speaking. In these rural areas, such activities would be of great value.

The bank proposes a simple definition of "rural" which is based on population density. Almost all rural areas have small populations with economies that are driven by a combination of farming and local businesses. We feel the definition should eliminate the concept of "underserved rural." This incorrectly assumes that rural poverty is caused by a lack of financial services in the community. In fact, it is a result of lack of employment opportunities, infrastructure, and wealth in the community. For example, attached is table comparing the ratio of FDIC-insured bank branches to the population of each county. For example, in Lake County, there is one FDIC branch for every 1,844 households, and in Sonoma County this figure is 1,777. As you can see, the number of households per FDIC branch is not significantly lower in affluent counties. Poverty in rural areas is not a result of the lack of financial services; it is the result of a lack of economic opportunities to succeed.

We would suggest the rural definition be based on population density, and exclude only those rural areas that are wealthy resort communities such as Lake Tahoe in California, ski resort

communities in Colorado, coastal Florida towns, and other resort areas that have high concentrations of wealth. These communities are easily identified. They are obviously not representative of the average rural community, and can easily be excluded.

Westamerica Bank fully supports the Federal Reserve Bank's efforts to expand the definition of community development in rural areas. We believe expanding the definition will cause all institutions to increase their involvement and create new ways to help rural America.

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County	Hhlds (2000)	# Businesses	# Branches	# Branches (C)	$ Deposits (mm)	SB Loans (2003)	$ SB Loans (000)	Bus/Branch (C)	HH/Branch (C)	Dep/Branch (all)	HH/Branch (all)	Loans/Bus	2004 MFI
Alameda	523,366	67,985	276	209	26,112	45,641	1,380,681	325.3	2,504.1	94.6	1,896.3	0.671	82200
Colusa	6,097	629	7	7	228	514	16,877	89.9	871.0	32.6	871.0	0.817	47500
Contra Costa	344,129	42,688	212	162	20,950	29,844	739,470	263.5	2,124.3	98.8	1,623.3	0.699	82200
Fresno	252,940	28,555	143	114	7,416	19,316	550,593	250.5	2,218.8	51.9	1,768.8	0.676	45900
Kern	208,652	22,253	95	79	4,272	14,737	377,712	281.7	2,641.2	45.0	2,196.3	0.662	46600
Kings	34,418	2,789	19	16	818	1,916	46,549	174.3	2,151.1	43.1	1,811.5	0.687	43800
Lake	23,974	2,149	15	13	687	1,530	26,797	165.3	1,844.2	45.8	1,598.3	0.712	42700
Madera	36,155	4,236	23	18	877	2,832	51,473	235.3	2,008.6	38.1	1,572.0	0.669	45900
Marin	100,650	18,127	78	60	7,141	14,967	477,219	302.1	1,677.5	91.6	1,290.4	0.826	95000
Mendocino	33,266	4,743	23	20	1,274	3,448	88,249	237.2	1,663.3	55.4	1,446.3	0.727	49200
Merced	63,815	6,225	30	23	1,603	3,678	81,593	270.7	2,774.6	53.4	2,127.2	0.591	43900
Napa	45,402	7,407	40	32	2,337	5,569	200,715	231.5	1,418.8	58.4	1,135.1	0.752	73900
Nevada	36,894	7,081	29	23	1,517	4,455	77,089	307.9	1,604.1	52.3	1,272.2	0.629	63600
Placer	93,382	14,503	92	83	4,386	11,405	272,095	174.7	1,125.1	47.7	1,015.0	0.786	64100
Sacramento	453,602	56,647	193	147	16,689	34,686	902,491	385.4	3,085.7	86.5	2,350.3	0.612	64100
San Francisco	329,700	46,645	242	185	82,825	33,018	1,071,705	252.1	1,782.2	342.3	1,362.4	0.708	95000
Solano	130,403	15,870	62	58	3,110	8,944	198,891	273.6	2,248.3	50.2	2,103.3	0.564	73900
Sonoma	172,403	24,512	119	99	8,392	17,986	454,968	247.6	1,741.4	70.5	1,448.8	0.734	74600
Stanislaus	145,146	17,900	93	75	5,204	10,635	264,188	238.7	1,935.3	56.0	1,560.7	0.594	52000
Tulare	110,385	10,854	64	59	2,831	7,810	190,863	184.0	1,870.9	44.2	1,724.8	0.720	42100
Tuolumne	21,004	3,146	20	16	916	1,775	23,541	196.6	1,312.8	45.8	1,050.2	0.564	51300
Yolo	59,375	7,078	29	26	1,964	4,364	160,550	272.2	2,283.7	67.7	2,047.4	0.617	60200
TOTALS	3,225,158	412,022	1,904	1,524	201,549	279,070	7,654,309	270.4	2,116.2	105.9	1,693.9	0.677	

Businesses = total number of businesses by county, per Centrax (2004)
Branches (C) = number of commercial bank branches by county, per FDIC
Bus/Branch (C) = # Businesses divided by # Branches (C)
HH/Branch (C) = 2000 Households (household count from 2000 census) divided by # Branches (C)
Dep/Branch (all) = $ Deposits (mm)(total FDIC insured deposits in county, per FDIC - 2004) divided by # Branches (all FDIC insured branches in county)
HH/Branch (all) = 2000 Households divided by # Branches (all FDIC insured branches in county)
Loans/Bus = SB Loans (2003)(total small business loans reported in 2003) divided by # Businesses
[NOTE: Loans per branch were not analyzed due to many lenders not having branches in the county]

Special Programs
Lake County, 2003-04

	County		State
	Participants	Percent of Enrollment	Percent of Enrollment
English Learners	786	7.5%	25.4%
Free/Reduced Price Meals	6,112	58.7%	49.0%
CalWORKs[1]	1,720	16.5%	9.3%
Compensatory Education	8,029	77.1%	51.0%

1 California Work Opportunity and Responsibility to Kids (formerly AFDC through 1997-98)

Special Education on DataQuest and CDE Special Education Division

Special Programs definitions

Source: Educational Demographics Office, Language Census (elsch04 9/1/04); School Fiscal Services Division (afdc2003 1/27/05); School Improvement Division (TIswp 11/5/04); School & District Accountability Division (T1y0203 11/8/04)

Special Programs
Sonoma County, 2003-04

	County		State
	Participants	Percent of Enrollment	Percent of Enrollment
English Learners	14,274	19.6%	25.4%
Free/Reduced Price Meals	18,945	26.0%	49.0%
CalWORKs[1]	2,388	3.3%	9.3%
Compensatory Education	15,666	21.5%	51.0%

1 California Work Opportunity and Responsibility to Kids (formerly AFDC through 1997-98)

Special Education on DataQuest and CDE Special Education Division

Special Programs definitions

Source: Educational Demographics Office, Language Census (elsch04 9/1/04); School Fiscal Services Division (afdc2003 1/27/05); School Improvement Division (TIswp 11/5/04); School & District Accountability Division (T1y0203 11/8/04)

Special Programs: Four student counts from several data sources, plus the percent of enrollment.

- **English Learner** (Language Census): Students who are not yet proficient in English. In previous years these students were referred to as Limited English Proficient (LEP).
- **Free /reduced price meals** (CalWORKs Report): Students enrolled in the program for free or reduced price meals. County social service offices for the whole attendance area report the students. Since some may attend private schools or have dropped out of school, the CalWORKs count may be slightly inflated.
- **CalWORKs** (CalWORKs Report): The students ages 5-17 whose families receive CalWORKs payments. This program replaced the former Aid to Families with Dependent Children (AFDC) after 1997-98. County social service offices for the whole attendance area report the students. Since some students may attend private schools or have dropped out of school, the CalWORKs count may be slightly inflated.
- **Compensatory education** (Consolidated Application): The students at the school participating in the federal Title I and/or the state Economic Impact Aid/State Compensatory Education (EIA/SCE) program. Title I is a federal program that provides supplementary services to low-achieving students from low-income families, and EIA/SCE is a state program that provides funds to low-achieving schools with high proportions of transient, low-income or English learner students. The goal of both is to improve student achievement in reading and mathematics.
- **Title I school** (Title I Application File): The profile will have either a "Yes" or a "No" indicating whether or not the school has Title I. Additionally, schools with Title I may have a Schoolwide Program (SWP). Title I is a federal program that provides supplementary services to low-achieving students from low-income families. Title I schools with more than 50 percent of their students from low-income families are eligible to become SWP schools. Title I SWP schools have the flexibility to serve all students at the school and are relieved of requirements to account for time and expenditures by services provided.

California Standardized Testing and Reporting (STAR)

Lake County

All Students

Total Enrollment on First Day of Testing:	**7,935**
Total Number Tested:	**7,880**
Total Number Tested in Selected Subgroup:	**7,880**

County Name:	Lake County
District Name:	----
School Name:	----
CDS Code:	17-00000-0000000

California Standards Test Scores - 2004

Grades

	2	3	4	5	6	7	8	9	10	11	EOC
Reported Enrollment	723	767	744	770	831	860	821	878	817	724	
CST English-Language Arts											
Students Tested	717	758	733	761	813	846	807	863	790	701	
% of Enrollment	99.2 %	98.8 %	98.5 %	98.8 %	97.8 %	98.4 %	98.3 %	98.3 %	96.7 %	96.8 %	
Mean Scaled Score	323.4	313.2	331.9	327.3	323.3	323.9	323.8	327.5	319.5	316.0	
% Advanced	8 %	4 %	11 %	10 %	7 %	7 %	7 %	8 %	11 %	9 %	
% Proficient	22 %	19 %	22 %	23 %	23 %	24 %	22 %	27 %	20 %	22 %	
% Basic	33 %	35 %	41 %	31 %	38 %	34 %	37 %	35 %	30 %	30 %	
% Below Basic	24 %	25 %	19 %	19 %	20 %	21 %	20 %	16 %	24 %	20 %	
% Far Below Basic	13 %	17 %	8 %	17 %	13 %	14 %	13 %	14 %	17 %	20 %	
CST Mathematics											
Students Tested	717	755	732	761	814	843		1			
% of Enrollment	99.2 %	98.4 %	98.4 %	98.8 %	98.0 %	98.0 %		0.1 %			
Mean Scaled Score	351.7	341.3	328.7	309.2	321.8	317.5		*			
% Advanced	18 %	13 %	11 %	5 %	7 %	7 %		*			
% Proficient	29 %	28 %	25 %	19 %	21 %	20 %		*			
% Basic	26 %	30 %	32 %	29 %	34 %	29 %		*			
% Below Basic	22 %	26 %	28 %	31 %	30 %	30 %		*			
% Far Below Basic	4 %	3 %	4 %	17 %	9 %	13 %		*			
CST General Mathematics (Grades **6** & **7** Standards)											
Students Tested							584	368			952
% of Enrollment							71.1 %	41.9 %			

Mean Scaled Score	308.2	298.8			304.6
% Advanced	2 %	1 %			2 %
% Proficient	16 %	13 %			15 %
% Basic	41 %	32 %			37 %
% Below Basic	24 %	27 %			25 %
% Far Below Basic	17 %	26 %			21 %
CST Algebra I					
Students Tested	205	312	238	164	919
% of Enrollment	25.0 %	35.5 %	29.1 %	22.7 %	
Mean Scaled Score	335.6	293.3	280.7	276.9	296.9
% Advanced	3 %	0 %	0 %	0 %	1 %
% Proficient	28 %	6 %	3 %	2 %	10 %
% Basic	50 %	33 %	21 %	17 %	31 %
% Below Basic	17 %	48 %	56 %	52 %	44 %
% Far Below Basic	1 %	12 %	20 %	29 %	15 %
CST Integrated Math 1					
Students Tested		1	1		2
% of Enrollment		0.1 %	0.1 %		
Mean Scaled Score		*	*		*
% Advanced		*	*		*
% Proficient		*	*		*
% Basic		*	*		*
% Below Basic		*	*		*
% Far Below Basic		*	*		*
CST Geometry					
Students Tested		121	167	105	393
% of Enrollment		13.8 %	20.4 %	14.5 %	
Mean Scaled Score		331.2	307.4	303.8	313.8
% Advanced		5 %	2 %	1 %	3 %
% Proficient		27 %	10 %	10 %	15 %
% Basic		42 %	44 %	40 %	42 %
% Below Basic		24 %	38 %	46 %	36 %
% Far Below Basic		3 %	7 %	3 %	4 %
CST Algebra II					
Students Tested		2	90	94	186
% of Enrollment		0.2 %	11.0 %	13.0 %	
Mean Scaled Score		*	286.9	276.6	282.3
% Advanced		*	0 %	0 %	0 %
% Proficient		*	8 %	2 %	5 %
% Basic		*	26 %	15 %	20 %
% Below Basic		*	49 %	57 %	53 %
% Far Below Basic		*	18 %	26 %	22 %

CST Summative High School Mathematics (Grades 9-11)

Students Tested			7	89	96
% of Enrollment			0.9 %	12.3 %	
Mean Scaled Score			*	305.8	308.0
% Advanced			*	4 %	5 %
% Proficient			*	13 %	14 %
% Basic			*	29 %	30 %
% Below Basic			*	45 %	44 %
% Far Below Basic			*	8 %	7 %

CST History - Social Science Grade 8 (Grades 6, 7 & 8 Standards)

Students Tested	800
% of Enrollment	97.4 %
Mean Scaled Score	311.4
% Advanced	4 %
% Proficient	16 %
% Basic	35 %
% Below Basic	26 %
% Far Below Basic	19 %

CST World History

Students Tested		782	
% of Enrollment		95.7 %	
Mean Scaled Score		307.0	
% Advanced		5 %	
% Proficient		15 %	
% Basic		30 %	
% Below Basic		22 %	
% Far Below Basic		28 %	

CST U.S. History

Students Tested			699
% of Enrollment			96.5 %
Mean Scaled Score			318.2
% Advanced			7 %
% Proficient			18 %
% Basic			39 %
% Below Basic			22 %
% Far Below Basic			15 %

CST Science Grade 5 (Grades 4 & 5 Standards)

Students Tested	754
% of Enrollment	97.9 %
Mean Scaled Score	316.8
% Advanced	1 %
% Proficient	21 %

% Basic	41 %				
% Below Basic	26 %				
% Far Below Basic	10 %				
CST Biology/Life Sciences					
Students Tested		115	299	80	494
% of Enrollment		13.1 %	36.6 %	11.0 %	
Mean Scaled Score		360.3	334.9	333.7	340.7
% Advanced		19 %	7 %	13 %	11 %
% Proficient		36 %	23 %	18 %	25 %
% Basic		41 %	54 %	47 %	50 %
% Below Basic		3 %	11 %	14 %	10 %
% Far Below Basic		1 %	5 %	9 %	4 %
CST Chemistry					
Students Tested			45	82	127
% of Enrollment			5.5 %	11.3 %	
Mean Scaled Score			352.0	340.6	344.6
% Advanced			16 %	1 %	6 %
% Proficient			40 %	38 %	39 %
% Basic			27 %	54 %	44 %
% Below Basic			13 %	6 %	9 %
% Far Below Basic			4 %	1 %	2 %
CST Earth Science					
Students Tested		206	2	29	237
% of Enrollment		23.5 %	0.2 %	4.0 %	
Mean Scaled Score		316.8	*	332.0	318.6
% Advanced		4 %	*	3 %	4 %
% Proficient		14 %	*	28 %	16 %
% Basic		47 %	*	52 %	48 %
% Below Basic		25 %	*	17 %	24 %
% Far Below Basic		10 %	*	0 %	9 %
CST Physics					
Students Tested			29	87	116
% of Enrollment			3.5 %	12.0 %	
Mean Scaled Score			321.1	327.2	325.7
% Advanced			0 %	5 %	3 %
% Proficient			14 %	20 %	18 %
% Basic			72 %	49 %	55 %
% Below Basic			3 %	22 %	17 %
% Far Below Basic			10 %	5 %	6 %
CST Integrated/Coordinated Science I					
Students Tested		87	30	37	154
% of Enrollment		9.9 %	3.7 %	5.1 %	

Mean Scaled Score	287.8	283.3	297.7	289.4
% Advanced	0 %	0 %	0 %	0 %
% Proficient	2 %	3 %	5 %	3 %
% Basic	30 %	27 %	41 %	32 %
% Below Basic	37 %	27 %	30 %	33 %
% Far Below Basic	31 %	43 %	24 %	32 %
CST Integrated/Coordinated Science II				
Students Tested		3	1	4
% of Enrollment		0.4 %	0.1 %	
Mean Scaled Score		*	*	*
% Advanced		*	*	*
% Proficient		*	*	*
% Basic		*	*	*
% Below Basic		*	*	*
% Far Below Basic		*	*	*
CST Integrated/Coordinated Science III				
Students Tested		1		1
% of Enrollment		0.1 %		
Mean Scaled Score		*		*
% Advanced		*		*
% Proficient		*		*
% Basic		*		*
% Below Basic		*		*
% Far Below Basic		*		*

California Department of Education

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California Standardized Testing and Reporting (STAR)

Sonoma County

All Students

Total Enrollment on First Day of Testing:	**56,117**
Total Number Tested:	**54,397**
Total Number Tested in Selected Subgroup:	**54,397**

County Name:	Sonoma County
District Name:	----
School Name:	----
CDS Code:	49-00000-0000000

California Standards Test Scores - 2004

Grades

	2	3	4	5	6	7	8	9	10	11	EOC
Reported Enrollment	5219	5276	5412	5497	5679	5865	5931	6105	5825	5308	
CST English-Language Arts											
Students Tested	5120	5172	5301	5403	5564	5767	5792	5750	5278	4540	
% of Enrollment	98.1 %	98.0 %	97.9 %	98.3 %	98.0 %	98.3 %	97.7 %	94.2 %	90.6 %	85.5 %	
Mean Scaled Score	333.7	329.1	346.1	348.4	345.3	342.9	337.7	340.1	335.6	326.7	
% Advanced	14 %	10 %	20 %	21 %	17 %	16 %	16 %	18 %	20 %	15 %	
% Proficient	24 %	25 %	26 %	27 %	29 %	30 %	26 %	28 %	23 %	25 %	
% Basic	30 %	32 %	32 %	29 %	34 %	30 %	33 %	26 %	25 %	25 %	
% Below Basic	21 %	19 %	14 %	12 %	14 %	14 %	15 %	15 %	18 %	14 %	
% Far Below Basic	11 %	14 %	9 %	11 %	7 %	9 %	10 %	13 %	14 %	20 %	
CST Mathematics											
Students Tested	5116	5178	5295	5407	5561	5751	16	2			
% of Enrollment	98.0 %	98.1 %	97.8 %	98.4 %	97.9 %	98.1 %	0.3 %				
Mean Scaled Score	361.1	355.1	345.1	335.4	345.2	336.1	0.0	*			
% Advanced	22 %	20 %	17 %	10 %	14 %	11 %	0 %	*			
% Proficient	30 %	29 %	30 %	27 %	28 %	27 %	0 %	*			
% Basic	27 %	27 %	29 %	30 %	32 %	30 %	0 %	*			
% Below Basic	18 %	20 %	22 %	23 %	21 %	24 %	0 %	*			
% Far Below Basic	3 %	3 %	3 %	10 %	5 %	8 %	100 %	*			
CST General Mathematics (Grades **6 &** 7 Standards)											
Students Tested							4179	2129	3		6311
% of Enrollment							70.5 %	34.9 %	0.1 %		

Mean Scaled Score	328.2	294.2	*		316.8
% Advanced	7 %	1 %	*		5 %
% Proficient	28 %	12 %	*		22 %
% Basic	34 %	29 %	*		32 %
% Below Basic	20 %	31 %	*		24 %
% Far Below Basic	11 %	26 %	*		16 %
CST Algebra I					
Students Tested	1421	2220	1245	564	5450
% of Enrollment	24.0 %	36.4 %	21.4 %	10.6 %	
Mean Scaled Score	371.3	317.6	285.4	279.3	320.6
% Advanced	14 %	1 %	0 %	0 %	4 %
% Proficient	50 %	20 %	5 %	3 %	23 %
% Basic	26 %	42 %	24 %	19 %	31 %
% Below Basic	8 %	32 %	52 %	56 %	33 %
% Far Below Basic	1 %	5 %	19 %	21 %	9 %
CST Integrated Math 1					
Students Tested		51	7	2	60
% of Enrollment		0.8 %	0.1 %		
Mean Scaled Score		298.9	*	*	294.8
% Advanced		0 %	*	*	0 %
% Proficient		16 %	*	*	15 %
% Basic		24 %	*	*	22 %
% Below Basic		47 %	*	*	42 %
% Far Below Basic		14 %	*	*	20 %
CST Geometry					
Students Tested	43	1041	1578	686	3348
% of Enrollment	0.7 %	17.1 %	27.1 %	12.9 %	
Mean Scaled Score	424.5	358.5	311.9	288.4	323.3
% Advanced	51 %	15 %	2 %	0 %	6 %
% Proficient	40 %	41 %	17 %	9 %	23 %
% Basic	9 %	31 %	40 %	28 %	34 %
% Below Basic	0 %	12 %	36 %	49 %	31 %
% Far Below Basic	0 %	1 %	5 %	14 %	5 %
CST Integrated Math 2					
Students Tested		2	45	2	49
% of Enrollment			0.8 %		
Mean Scaled Score		*	306.8	*	308.2
% Advanced		*	4 %	*	6 %
% Proficient		*	9 %	*	10 %
% Basic		*	36 %	*	33 %
% Below Basic		*	44 %	*	41 %
% Far Below **Basic**		*	7 %	*	10 %

CST Algebra II					
Students Tested	1	45	968	1116	2130
% of Enrollment		0.7 %	16.6 %	21.0 %	
Mean Scaled Score	*	380.0	330.6	291.7	311.3
% Advanced	*	27 %	7 %	1 %	4 %
% Proficient	*	49 %	28 %	10 %	19 %
% Basic	*	16 %	35 %	28 %	31 %
% Below Basic	*	2 %	24 %	41 %	32 %
% Far Below Basic	*	7 %	7 %	20 %	14 %
CST Integrated Math 3					
Students Tested			11	15	26
% of Enrollment			0.2 %	0.3 %	
Mean Scaled Score			347.4	271.7	302.0
% Advanced			0 %	0 %	0 %
% Proficient			50 %	0 %	20 %
% Basic			30 %	27 %	28 %
% Below Basic			20 %	47 %	36 %
% Far Below Basic			0 %	27 %	16 %
CST Summative High School Mathematics (Grades 9-11)					
Students Tested		1	55	844	900
% of Enrollment			0.9 %	15.9 %	
Mean Scaled Score		*	392.9	340.7	343.7
% Advanced		*	27 %	10 %	11 %
% Proficient		*	51 %	31 %	32 %
% Basic		*	11 %	32 %	31 %
% Below Basic		*	5 %	25 %	24 %
% Far Below Basic		*	5 %	2 %	3 %
CST History - Social Science Grade 8 (Grades 6, 7 & 8 Standards)					
Students Tested	5749				
% of Enrollment	96.9 %				
Mean Scaled Score	326.3				
% Advanced	11 %				
% Proficient	22 %				
% Basic	32 %				
% Below Basic	20 %				
% Far Below Basic	15 %				
CST World History					
Students Tested			5055		
% of Enrollment			86.8 %		
Mean Scaled Score			323.5		
% Advanced			13 %		
% Proficient			20 %		

% Basic				26 %	
% Below Basic				17 %	
% Far Below Basic				24 %	
CST U.S. History					
Students Tested					4319
% of Enrollment					81.4 %
Mean Scaled Score					331.4
% Advanced					14 %
% Proficient					23 %
% Basic					29 %
% Below Basic					18 %
% Far Below Basic					16 %
CST Science Grade 5 (Grades 4 & 5 Standards)					
Students Tested	5343				
% of Enrollment	97.2 %				
Mean Scaled Score	328.9				
% Advanced	4 %				
% Proficient	28 %				
% Basic	43 %				
% Below Basic	19 %				
% Far Below Basic	6 %				
CST Biology/Life Sciences					
Students Tested		1089	3123	526	4738
% of Enrollment		17.8 %	53.6 %	9.9 %	
Mean Scaled Score		334.1	334.1	332.2	333.9
% Advanced		10 %	10 %	12 %	10 %
% Proficient		26 %	26 %	22 %	25 %
% Basic		39 %	37 %	33 %	37 %
% Below Basic		15 %	16 %	20 %	16 %
% Far Below Basic		10 %	11 %	14 %	11 %
CST Chemistry					
Students Tested		2	343	1284	1629
% of Enrollment			5.9 %	24.2 %	
Mean Scaled Score		*	355.9	344.0	346.4
% Advanced		*	20 %	12 %	14 %
% Proficient		*	32 %	31 %	31 %
% Basic		*	39 %	42 %	41 %
% Below Basic		*	6 %	10 %	9 %
% Far Below Basic		*	3 %	5 %	5 %
CST Earth Science					
Students Tested		745	109	102	956
% of Enrollment		12.2 %	1.9 %	1.9 %	

Mean Scaled Score	321.1	292.9	297.2	315.4
% Advanced	7 %	0 %	1 %	5 %
% Proficient	22 %	8 %	9 %	19 %
% Basic	35 %	29 %	33 %	34 %
% Below Basic	18 %	25 %	30 %	20 %
% Far Below Basic	18 %	38 %	28 %	21 %
CST Physics				
Students Tested	20	18	271	309
% of Enrollment	0.3 %	0.3 %	5.1 %	
Mean Scaled Score	249.3	345.2	349.0	342.3
% Advanced	0 %	11 %	16 %	15 %
% Proficient	0 %	39 %	33 %	31 %
% Basic	5 %	33 %	36 %	34 %
% Below Basic	5 %	6 %	9 %	8 %
% Far Below Basic	90 %	11 %	6 %	12 %
CST Integrated/Coordinated Science I				
Students Tested	2271	211	270	2752
% of Enrollment	37.2 %	3.6 %	5.1 %	
Mean Scaled Score	305.7	296.4	297.7	304.2
% Advanced	1 %	0 %	0 %	1 %
% Proficient	12 %	9 %	6 %	11 %
% Basic	41 %	37 %	39 %	40 %
% Below Basic	26 %	22 %	33 %	27 %
% Far Below Basic	19 %	31 %	22 %	20 %
CST Integrated/Coordinated Science II				
Students Tested	2	56		58
% of Enrollment		1.0 %		
Mean Scaled Score	*	334.8		331.9
% Advanced	*	5 %		5 %
% Proficient	*	39 %		38 %
% Basic	*	29 %		28 %
% Below Basic	*	20 %		19 %
% Far Below Basic	*	7 %		10 %
CST Integrated/Coordinated Science III				
Students Tested			1	1
% of Enrollment				
Mean Scaled Score			*	*
% Advanced			*	*
% Proficient			*	*
% Basic			*	*
% Below Basic			*	*
% Far Below Basic			*	*

CST Integrated/Coordinated Science IV				
Students Tested	1	1	23	25
% of Enrollment			0.4 %	
Mean Scaled Score	*	*	355.9	346.4
% Advanced	*	*	17 %	16 %
% Proficient	*	*	48 %	44 %
% Basic	*	*	30 %	28 %
% Below Basic	*	*	0 %	4 %
% Far Below Basic	*	*	4 %	8 %

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