



May 30, 2024

Re: LBUSD's Draft LCAP Fails to Include Equity Gap Closing Actions and Goals

Dear Superintendent Baker, Assistant Superintendent Brown, and Board Members:

We look forward to the release of the district's second draft of the Local Control and Accountability Plan (LCAP) for the 2024-25 school year. In recent years, Long Beach Unified has made significant strides in its approach to the LCAP community engagement process.

We appreciate these changes, which include: beginning the LCAP engagement process earlier in the year, adopting recommendations based on community feedback, and securing programs and services for Black students, English Learners, and other high need students.

As you finalize your second draft of the Local Control and Accountability Plan for the 2024-25 school year, we want to remind you of your obligation to include required actions to close equity gaps in the LCAP, and to create focus goals that address equity gaps and teacher credentialing, subject matter preparation, and retention issues at school sites that receive Equity Multiplier funding (Educational Partnership High and Reid High). The initial draft of the LCAP did not include these important goals and actions.

### **Closing Equity and Opportunity Gaps Through Required Actions**

This year, school districts and other local education agencies are required to include specific actions to address the following equity and opportunity gaps in their LCAPs:

- Any **student subgroup** that has a red Dashboard indicator
- Any **school** that has a red Dashboard indicator; and
- Any **student subgroup within a school** that has a red Dashboard indicator.
- Specific actions for **long term English Learners (LTEL)**, if there are more than 15.

We applaud LBUSD for highlighting student subgroups and schoolsites that face equity gaps and scored "red" in the California School Dashboard indicators last year. [See LBUSD 2024-25 LCAP Draft #1 pp. 6-20](#). We also recognize that many of the focus goals that target student subgroups note were chosen explicitly because they scored in the "red" level on at least one indicator from the California School Dashboard in 2022-23. [See LBUSD 2024-25 LCAP Draft #1 pp. 40, 46, 54, and 58](#). However, none of the actions attached to these goals specifically address the red indicator for the identified subgroup and/or schools. Here are a few examples that are particularly important to families because of our ongoing advocacy to close equity gaps in these areas:

- **Black students in the red on the suspension indicator districtwide.**  
Goal 2 (High Quality Learning: Black Student Achievement) is a focus goal that acknowledges Black students are in the "red" for suspension and have the highest suspension rate of any LBUSD student group. [See LBUSD 2024-25 LCAP Draft #1 p. 40](#).

Yet, metrics for this goal do not capture Black student suspension rates nor do any of the actions appear to be targeted to address this specific equity gap. Goal 7 (Equitable and Liberatory District) includes suspension rate as a metric, but does not include disaggregated suspension rates for Black students, nor do any of its actions address the disproportionate suspension rate of Black students. Thus, the current LCAP draft lacks any required action to address the oversuspension of Black students in LBUSD. An example of a specific action to address this equity gap would be a full-time restorative justice teacher at schools where Black students are red for suspension. Another example would be to have a BSAI counselor at schools with high numbers of Black students, similar to the Black Student Achievement Program (BSAP) staffing in neighboring district LAUSD.

- ***Students with Disabilities in the red on Graduation and English Language Arts districtwide.*** Goal 4 (High Quality Learning: Students with Disabilities) is a focus goal that acknowledges that students with disabilities are in the “red” for both graduation rates and English Language Arts. [See LBUSD 2024-25 LCAP Draft #1 pp. 54.](#) However, none of the actions are designed to address these specific equity gaps. For example, counselors can play an important role in improving graduation rates for students with disabilities, but there is no mention of counselors under this goal (and the counselor action does not mention anything about supporting students with disabilities). In addition, none of the actions under Goal 4 indicate how students with disabilities will be afforded more literacy support. For example, the district could deploy literacy teachers specifically for students with disabilities. The entire rationale for these new required actions is that closing equity gaps is no longer optional and requires targeted support and services -- not a one size fits all approach.
- ***School sites in the red on English Learner Progress.*** Goal 3 (High Quality Learning: EL/LTEs) is a focus goal for English learners and notes that the district is green for English Learner Progress overall, but fails to note that 8 school sites<sup>1</sup> are red on this indicator. [See LBUSD 2024-25 LCAP Draft #1 pp. 47.](#) Under the new LCAP requirements, LBUSD must include a specific action designed to address the lack of English learner progress at these schools. An example of a specific action targeted at these school sites would be providing additional primary language support aides to those schools. The existing actions for EL support are not sufficient because they are not targeted to the school sites that have been struggling more than the district overall.
- ***No Specific Actions for LTEs.*** Although Goal 3 mentions LTEs, there are no specific actions designed for this student group - even though there are 2500 in LBUSD. [See LBUSD 2024-25 LCAP Draft #1 p. 45.](#) There is only one action under Goal 3 and it does not mention anything that is targeted for LTEs in terms of language acquisition or professional development. Examples of specific actions for LTEs include specific interventions and tutoring programs for LTEs, targeted professional development on how to effectively teach LTEs, and bilingual counselors at the secondary levels that are specially trained to support LTEs with reclassification and accessing graduation and A-G requirements while continuing to develop English language proficiency.

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<sup>1</sup> The following school sites are red for English Learner Progress: (1) Bryant Elementary School; (2) Harte Elementary School; (3) Webster Elementary School; (4) Whittier Elementary School; (5) Hoover Middle School; (6) Millikan High School; (7) Wilson High School; and (8) Educational Partnership High School.

## The Important Role of Counselors in Closing Equity and Opportunity Gaps

Counselors play a key role in closing equity and opportunity gaps because they are the only mental health professionals that are equipped to support students with their academic, social-emotional, and college and career readiness goals. For example, counselors can:

- Reduce suspension rates for Black students by working with site staff to implement restorative justice practices, provide culturally responsive counseling, and partner with families and trusted organizations.
- Improve graduation rates for students with disabilities by developing and monitoring IEPs, exploring all pathways after high school, and supporting the students to develop the necessary skills to succeed.
- Support long-term English Learners to reclassify by collaborating with ESL teachers, ensuring students are on-track academically, and creating inclusive spaces to integrate students into the school community.

However, counselors cannot play their crucial role in closing opportunity gaps unless they are able to perform their counseling duties instead of the administrative functions that have been piled on them. Moreover, counselors need to have a reasonable caseload to fulfill their duties effectively - the student to counselor ratios are often double or triple the recommended ratio of 250:1.

Finally, it is crucial that counselors reflect the students with highest needs, so it is important that the district prioritize hiring and retaining Black counselors and bilingual counselors, and place them at the school sites with the highest concentration of those students. For more information, please see our [2022 letter](#) and [other resources](#).

These are just a few examples – LBUSD noted that Black students, English Learners, Foster youth, Homeless youth, and Students with disabilities all scored in the “red” across at least one category districtwide. [See LBUSD 2024-25 LCAP Draft #1 pp. 12-13](#). LBUSD is failing these subgroups of students in academic progress, suspension, and graduation. The District cannot merely acknowledge these subgroups are in the “red”, but it must create specific actions that target the particular equity gaps facing these student groups. In addition, the district must identify how it will close equity gaps between and within schools, which is completely absent from the current draft of the LCAP. Including these specific actions and associated metrics in the next draft before the LCAP public hearing will allow for meaningful community engagement on the district’s efforts to close opportunity gaps in Long Beach. Community engagement requires more than mere recognition and explanation of a new LCAP requirement, but also how its implementation affects the structure and plan for the future.

To summarize, we urge LBUSD to include the following in the next draft of the LCAP to allow for meaningful community engagement on its plan to close opportunity gaps, as required by law:

- Specific actions directed to student subgroups who scored in the “red” at the district level that are designed to address the “red” category
- Specific actions directed to schoolsites who scored in the “red” that are designed to address the “red” category
- Links to School Plans for Student Achievement (SPSAs) for schoolsites that include specific actions for student subgroups who scored in the “red” within the school site

## **Equity Multiplier**

The LCFF Equity Multiplier provides extra funding for districts and other local education agencies to allocate to schoolsites that have high rates of nonstability and socioeconomically disadvantaged students in the previous year. This year's LCAP requires districts to include focus goals that address (1) all site subgroups that scored in the "red" and (2) underlying issues in the credentialing, subject matter preparation, and retention of educators for sites who receive funding from the Equity Multiplier. [See 24-25 LCAP Template Instructions pp. 5-6, 8-10, 12, 25.](#)

Two of LBUSD's schools, Education Partnership High School (EPHS) and Reid High School, generate funding pursuant to the Equity Multiplier in this year's LCAP. [See LBUSD LCAP Draft #1 p. 84.](#) As a recipient of these funds, LBUSD is required to include the aforementioned focus goals and "consult with educational partners at schools generating Equity Multiplier funds in the development of the LCAP". [See LBUSD LCAP Draft #1 p. 23.](#) However, LBUSD has not met these requirements in the first draft of the LCAP.

The first draft only stated the focus goal and referenced the data supporting the goal's inclusion. LBUSD clarified that the metrics and actions for this goal are "coming soon" and we hope they are included in the second draft of the LCAP to allow for meaningful community engagement. [See LBUSD LCAP Draft #1 pp. 85-86.](#) We are also looking forward to projected expenditures for various goals and actions now that the Governor's May Revise Budget has been released.

We recommend that the District include the following in the next draft of the LCAP to ensure compliance with the new LCAP requirements:

- Focus goals for subgroups that scored in the "red", as well as goals, metrics, and actions related to educator preparation and retention<sup>2</sup>
- Describe how the community was consulted in the development of Goal 9 (Accelerated Learning for Students in Alternative or Continuation Schools) in the "Engaging Educational Partners" section and the explanation of the goal itself
- Adequately reflect Equity Multiplier funds in the "Other State Funds" section of the "Total Planned Expenditures" table
- Identify the schools receiving Equity Multiplier funds in the Plan Summary, as required by the LCAP template.

Thank you for your partnership over the years and we strongly urge the District to include these updates in the second draft of the LCAP so educational partners can provide meaningful feedback to the implementation of these new requirements. For additional guidance, you can review the [guidance provided to all superintendents in the state](#) on May 18th.

If you have questions or concerns about the contents of this letter, please contact Michael Ball at [mball@childrensdefense.org](mailto:mball@childrensdefense.org) or Nicole Gon Ochi at [nochi@publicadvocates.org](mailto:nochi@publicadvocates.org).

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<sup>2</sup> Specifically, we would expect to see the following focus goals: (1) For both schools: educator credentialing, subject matter preparation, and education retention; graduation rates for all students, especially Latine and socioeconomically disadvantaged students; (2) For EPHS: English learner progress, English language arts and math for Black students; and (3) For Reid: suspension rates for all students.

Sincerely,

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