



November 3, 2023

Dr. Linda Darling-Hammond, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

RE: LCFF Equity Coalition Comments re SBE Agenda - November 8-9, 2023

Item 07: The Local Control and Accountability Plan Template – Adoption of the Revised Local Control and Accountability Plan Template, Consistent with California Education Code Section 52064.

Dear Dr. Darling-Hammond & State Board Members:

We represent a coalition of civil rights, advocacy, community, family, student, educator and other organizations that have worked diligently on passage and implementation of the Local Control Funding Formula (LCFF) and its accountability system, both at the state and local levels. We are committed to ensuring that LCFF lives up to its equity promise to focus resources on helping California’s neediest students overcome the barriers they face in graduating college and career ready and accessing a more equitable school system. Our commitment extends to LCFF’s foundational principles of meaningful local engagement informed by a new level of transparency and fiscal accountability in their local schools.

The Local Control Accountability Plan (LCAP) is critical in LCFF’s system of accountability and continuous improvement. Members of the LCFF Equity Coalition have worked in partnership with community based organizations, LEAs and other education interest holders on the LCAP since its initial introduction and development in 2012.

Please consider the following points for Item 07, to be discussed before the Board on November 8. The Equity Coalition has also submitted a separate letter on Items 8, 9, and 16.

- I. The LCAP must center informed community engagement to encourage accountability that is grounded in equity.**

Meaningful community engagement is a core principle, mandated by statute, that undergirds the LCAP. The LCAP is fundamentally an accountability document, and students, parents and families must be intricately involved throughout the entire process to uplift the needs of students.

- A. Require engagement of Parent Action Committees (PAC), District English Learner Advisory Committees (DELAC), and applicable Student Advisory**

Committees (SAC) not only for LCAP adoption, but also LCAP development.

The Equity Coalition is increasingly concerned with the California Department of Education's (CDE) stance that distinguishes between educational partners that must be engaged during the *development* process, as opposed to LCAP *adoption*. Specifically, during an October 30, 2023 meeting with Josh Strong and other CDE staff, Mr. Strong stated that PACs, DELACs, and SACs need only be involved in the adoption of LCAP, not its development. Citing Cal.Educ. Code §52060(g) and §52066(g), which enumerates that "teachers, principals, administrators, other school personnel, local bargaining units of the school district, parents, and pupils" must be engaged in developing a LCAP, CDE staff inferred that because these committees were not specifically cited in these statutory sections, that they are not essential partners to be meaningfully engaged with during the LCAP *development* process, but only thereafter as a rubber stamp to finalization before LCAP approval and adoption.

However, Cal.Educ. Code §52063 and §52069, which govern engagement with these educational partners, *requires* these committees be established "to provide advice to the governing board of the school district and the superintendent of the school district regarding the requirements of this article," meaning all the LCAP development provisions in ARTICLE 4.5. Local Control and Accountability Plans and the Statewide System of Support [Sections 52059.5 - 52077]. Moreover, legislative intent under Senate Bill 997 (Pan), which most recently added Student Advisory Committees (SACs) for a district serving middle or high school students alongside PACs and DELACs and which will become operable on July 1, 2024, further emphasizes that their engagement is not merely for the LCAP adoption process which in some LEAs does not occur until end of May or even until June.

Section 1(b) for SB 997 emphasizes that "[t]he local control and accountability plan is centered on the idea that meaningful engagement of educational partners, especially pupils, is essential to gaining insight about the programs and services that are critical to a local educational agency's strategic planning for the support of all pupils." Moreover, the [Assembly Committee on Education's analysis](#) of SB 997 explicitly summarizes the bill as "requir[ing] school districts serving middle or high school students to either include two students on an existing parent advisory committee or establish a student advisory committee for **purposes of developing and adopting** the Local Control and Accountability Plan (LCAP)." (emphasis added).

Therefore, the Coalition believes that PACs, DELACs and SACs cannot be omitted from the development process because the "requirements of this Article" include consultation not only for the purposes of LCAP adoption, but during LCAP development. These groups should not be relegated to the end of the LCAP process, but rather should be part of the ideation of programs and processes that aim to meet student needs.

Under "Engaging Educational Partners," the template and instructions must thereby include prompts for all required entities - PACs, DELACs and SACs (for a district serving middle or high school students) - that must be engaged during LCAP development and adoption. These groups should be explicitly listed in the prompts, and language should clearly articulate that LEAs must engage with these groups not only during LCAP development, but also LCAP adoption and approval. Please remove any distinction between LCAP development and LCAP adoption in the template and instructions to remove confusion for LEAs.

Moving in the direction proposed by CDE is a step backward. CDE's interpretation runs contrary to the spirit of the LCAP, which is to encourage holistic engagement of educational partners,

particularly families and students, throughout the entire LCAP process.

B. Ensure that the LCAP centers readability and understanding by students, parents and families by reinstating LCAP Highlights and including Dashboard links.

The template and instructions should ensure that the LEA clearly reports developments to families, students, and other community interest holders, so that they can easily understand, track and participate in an informed way in shared decision making. Providing an executive summary is particularly important to community partners who might have difficulty understanding all of the nuanced and technical sections of the LCAP, but will be able to understand the main focus of the LEA's plan to drive continuous improvement.

The Equity Coalition recommends the following amendments:

- **Reinstitute “LCAP Highlights” from the Plan Summary, but with character word limits to show its intent to be an executive summary of the LEA’s overall strategy.** This prompt is the clearest amalgamation of the LEA’s overall strategy to respond to the needs of students in their district, where community members can easily reference and track the most salient developments and outcomes of the LEA’s plan. LCAPs can be lengthy, and the Highlights section provides LEAs the opportunity to succinctly communicate key components of the LCAP.
- **Require that links to the Dashboard be incorporated into the LCAP Template.** This action would improve transparency by making this information more accessible to students, families, and communities, thereby increasing the likelihood of community engagement in the LCAP development process. It would also complement recently enacted legislation, SB 609 (Caballero), which requires LEAs to post the current school year’s adopted LCAP on the performance overview portion of the California School Dashboard. This would align with CDE’s requirement to notify LEAs of this new requirement which takes effect at the same time as the new LCAP. Cal.Educ. Code § 52065(c).

C. Ensure that students, parents and families are heard by including a summary of educational partner feedback and broadening language to include “parents and families.”

The LCAP should signal to education partners, particularly families, that they are equal partners in this process and that LEAs want to engage with them in a meaningful and understandable way.

Moreover, it is required by law. Cal.Educ. Code §52064(b)(10) requires that the LCAP template calls for: “A summary of the stakeholder engagement process, including stakeholders at schools generating funding pursuant to Section 42238.024, and how stakeholder engagement influenced the development of the adopted local control and accountability plan and annual update to the local control and accountability plan.”

The Equity Coalition recommends the following amendments:

- **Under “Engaging Educational Partners,” include an additional column that requires summary of partner feedback.** Asking for a *description of how* the adopted LCAP was influenced by the feedback is regressive. It is important to understand all of

the feedback received by partners, not just a self-serving statement that input was considered or the cherry-picked feedback that the LEAs chose to include.

- Alternatively, in the prompt where LEAs are asked to describe how the LCAP was influenced by partner feedback, the response should not be a narrative prompt, but rather a table where LEAs should have to identify each partner that they are required to engage with and describe how each partner influenced the plan.
- **Broaden inclusivity by changing “parents” to “parents and families” in the Table under “Engaging Educational Partners.** This will signal an understanding that families come in many configurations.

The LCFF Equity Coalition, along with students and families, fought hard for the ability of families, students and community members to be heard in the LCAP process and the State Board of Education (SBE) agreed. As early as the 2014-15 LCAP, the Board provided guiding questions to LEAs about what was then called “stakeholder” engagement. The Board approved these guiding questions in response to the overwhelming outpouring from hundreds of parents, students and community advocates, including the Equity Coalition, that excluding the feedback received during the LCAP engagement and consultation process was disrespectful and a huge disincentive to participate. The Board approved the LCAP, including these Guiding Questions, even though it was not statutorily required.

“Guiding Questions from 2019-20 LCAP Template:

- 1) How have parents, community members, pupils, local bargaining units, and other stakeholders (e.g., LEA personnel, county child welfare agencies, county office of education foster youth services programs, court--appointed special advocates, foster youth, foster parents, education rights holders and other foster youth stakeholders, English learner parents, community organizations representing English learners, and others as appropriate) been engaged and involved in developing, reviewing, and supporting implementation of the LCAP?
- 2) How have stakeholders been included in the LEA’s process in a timely manner to allow for engagement in the development of the LCAP?
- 3) What information (e.g., quantitative and qualitative data/metrics) was made available to stakeholders related to the state priorities and used by the LEA to inform the LCAP goal setting process?
- 4) What changes, if any, were made in the LCAP prior to adoption as a result of written comments or other feedback received by the LEA through any of the LEA’s engagement processes?
- 5) What specific actions were taken to meet statutory requirements for stakeholder engagement pursuant to Education Code sections 52062, 52068, and 47606.5, including engagement with representative parents of pupils identified in Education Code section 42238.01?
- 6) In the annual update, how has the involvement of these stakeholders supported improved outcomes for pupils related to the state priorities?”

Since then, the LCAP template prompts have shrunk and this is very concerning and a turn-around from prior Board direction to *show* community partners that their engagement matters. Restoring this instruction will help LEAs meaningfully include their educational partners and demonstrate that the engagement activities are not simply compliance boxes to check and that they take educational partners’ input seriously.

II. The LCAP template and instructions should clearly support Local Education Agencies (LEAs) in meaningfully addressing disparities in opportunities and outcomes between student groups.

Cal.Educ. Code §52064(e) requires LEAs to address and reduce disparities in opportunities and outcomes between pupil groups indicated by the California School Dashboard and any state or locally identified priorities through meaningful engagement with local education interest holders. Rather than a permissive, recommended approach (i.e., “encouraged” or “should”), the LCAP now *requires* the closing of gaps in student opportunities and outcomes. This is a new requirement and should be called out as such for all–drafters and readers of the LCAP so they know it is different from prior LCAPs.

A. Ensure that specific, focused actions are explicitly reported by LEAs along 3 dimensions: red by district, red by school, and red by student subgroup(s) at a school site.

Pursuant to this summer’s Budget Act, Cal.Educ. Code § 52064(e)(6) now requires LEAs to identify specific LCAP actions addressing instances where a school, student subgroup, or student subgroup within a school, received a red on one or more more state indicators on the Dashboard the year prior to the adoption of the LCAP. LEAs must now demonstrate an overall plan and that specific action steps are being taken to close performance gaps. This applies for the duration of the 3-year LCAP period.

Under “Reflections: Annual Performance,” the instructions should indicate that LEAs **must, and are not encouraged to**, highlight how they are addressing the identified needs of student groups, and/or schools within the LCAP as part of their response. Thus, we request that the word "are encouraged to" be deleted on Page 24 on Attachment 3, and be replaced with "must" in highlighting how LEAs are addressing the identified needs of student groups, and/or schools within the LCAP as part of their response.

In addition, The Equity Coalition strongly believes that the requirements outlined in Cal.Educ. Code § 52054(e)(6) can best be reflected in the form of a table, not a narrative. The Equity Coalition recommends incorporation of a table similar to our suggestions below into the revised LCAP template. We believe that this will help LEAs by: 1) better prompting districts to more clearly outline which student group(s) and/or schoolsite(s) are the focus of an action, and 2) helping LEAs to “track and report their progress annually on all state priorities” for each group pursuant to Cal.Educ. Code § 52064(e)(2).

SPECIFIC ACTIONS TABLE

“RED” STUDENT GROUP AND/OR SCHOOL	STATE INDICATOR(S)	ACTION NUMBER	TARGETED ACTION(S)
Students w/ Disabilities	ELA proficiency Suspension Chronic Absenteeism		
ABC High School	College & Career Readiness		

Black students @ ABC High School	College & Career Readiness Suspension		
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We also recommend the following changes to the Total Planned Expenditures Table:

- **Add a column labeled "Required Action (Y/N)."** The instructions for filling out this table should make clear that this column should be checked if a specific action is designed to address a red performance issue, with the student subgroup and/or school clearly indicated in the table under "student group(s)" column and "location."
- **Include a "Type of Action" column.** This column will enable LEAs to enter one or more of the following types of actions: 1) Focus actions; 2) Equity Multiplier actions (linked to an Equity Multiplier focus goal), Technical Assistance actions, 4) Contributing actions, and 5) Actions related to Concentration Grant Add-on funds.

In addition, the Equity Coalition recommends that for student groups with small sample sizes at the school site level, that the LCAP particularly support LEAs in tracking these groups at the district level (e.g., youth in foster care). This will help community-serving organizations and agencies to better understand the disparities and challenges that they face, and develop programming and services that address their needs.

These amendments will ensure that the lowest-performing groups are explicitly addressed in the LCAP.

B. For LEAs receiving Equity Multiplier (EM) funding, help LEAs be accountable and streamline LEA reporting.

With EM funding and EM schools as new additions, CDE must clearly communicate the fund’s purpose in the LCAP. Families, students, and educators should be able to easily identify if their schools and districts are receiving these additional funds, how much they are receiving, what the focus goal(s) are, etc.

1. Ensure that LEAs are accountable for properly using EM funds and following the “supplement not supplant” requirement.

Cal.Educ. Code § 42238.024 requires that EM funding should “supplement not supplant” other tranches of funds received by the LEA. As stated by Governor Newsom, this new funding is intended to magnify the impact of base, supplemental and concentration funding (and, conversely, not limit the scope of focus goals and actions to EM grant amounts) to “[accelerate learning gains and close opportunity gaps](#)...using a more targeted methodology than the existing supplemental grant eligibility.” EM funds provide LEAs with a key opportunity to target student groups and schools that are not part of the increased/improved services analysis, and ultimately lead to school transformation. The LCAP should help LEAs implement this new requirement as they make their plans with educational partners and should direct LEAs to be transparent about it. The document is properly named *Accountability Plan*, and that includes being accountable for the supplement not supplant requirements of EM grants.

2. Adopt an addendum that allows for clear outlining and explanation of the LEA’s focused goals, actions and spending.

Cal.Educ. § 52054(e)(7) requires that LEAs receiving EM funding shall include focused goals for each school receiving funding that addresses red student subgroups and any underlying issues in the credentialing, subject matter preparation, and retention of the school’s educators.

While we appreciate that the LCAP template and instructions incorporate EM requirements in various parts of the template, particularly the new section on “Required Focus Goal(s) for LEAs Receiving Equity Multiplier Funding,” the current format is very confusing because so much is outlined in the instructions, yet very little is reflected in the template.

As a result, the Equity Coalition recommends consolidation of all EM requirements in an [EM addendum](#), which addresses a number of statutory requirements outlined in Cal.Educ. § 52054(e)(7), to allow for ease of reading. This would be especially helpful for those LEAs that do not receive EM funding and those LEAs with many sites receiving EM funding.

This addendum will improve transparency and accountability by:

- Clearly requiring focus goal differentiation per school site and student subgroup for EM schools.
- Allowing for the listing of specific school sites receiving EM funds.
- Signaling to families and students, as well as LEAs, that their engagement is required to help define EM goals and actions, so that they know that they have the right to weigh in on the identification of needs and use of these funds and other LCFF funds to address the reasons for EM eligibility.
- Providing clarity regarding how much each school site received as well as how those funds are being used.
- Allowing the LEA to demonstrate its compliance with the “supplement not supplant” requirement as reflected in Cal.Educ. Code § 42238.024, as opposed to combining EM Funds under “Other State Funds” in the Total Planned Expenditure Table, which does not allow for differentiation from other tranches of funds that also fit into this category (E-LOP, CCSP, etc.).

Alternatively, if the SBE is not inclined to adopt an EM addendum, we recommend the following changes:

- **Reference in the template under Plan Summary, not merely the instructions, that EM school sites must be listed.** While instructions can be more technical and need not meet the user-friendly requirement, more is needed in the template itself to ensure community partners are informed. Community partners should not have to read the Instructions to realize that their specific EM school sites are to be identified in the LCAP.
- **Create a disaggregated LCFF column in the Total Planned Expenditures Table** listing base, supplemental, concentration and concentration add-on, and EM funds separately. This will complement the appreciated changes made by CDE requiring separate prompts on LEA-wide and schoolwide actions, limited actions, and concentration grant add-ons under the “Increased or Improved Services” section.

These recommendations will improve transparency and support LEAs in aligning school site and district-level goals while also increasing the chance that educational partners can be more informed in their engagement.

III. The LCAP should support LEAs in developing the skills needed for thoughtful analysis of the effectiveness of their actions to address student needs, or lack thereof, and to change plans accordingly.

Cal.Educ. Code § 52064(b)(7) states that the LCAP template must include an assessment of the effectiveness, or lack thereof, of the specific actions described in the LCAP toward achieving the goals. As a result of the 2023 Budget Act and SB 114, Cal.Educ. § 52064(e)(8) now requires the instructions make clear that LEAs *are mandated to change actions that have not proven effective* over a three-year period, providing reasons for lack of progress and how any changes to the action will result in a new or strengthened approach. Thus, an effectiveness analysis and response, and *not mere determination* of ineffectiveness, must be part of the LCAP process. To comply with this new explicit mandate for revision of ineffective actions, we recommend:

A. Under “Goals and Analysis,” require an ineffectiveness analysis in the template, not just the instructions.

The prior prompt merely asks for identification of ineffective specific actions, not how an LEA will improve their actions and amend their strategies accordingly. As a result, the last prompt under “Goals and Analysis” should explicitly require an ineffectiveness analysis, and not just in the instructions. We recommend the following additional language: “A description of any changes made to the planned goal, metrics, desired outcomes, or actions for the coming year that resulted from reflections on prior practice. *This should include the reasons for ineffectiveness (if any), and how changes to the action(s) will result in a new or strengthened approach.*” This will more strongly prompt reflection and lift up the importance of continuous improvement.

B. Under “Increased or Improved Services,” require LEAs to reflect on the effectiveness of their actions.

As aforementioned, the Equity Coalition was especially heartened to see separate prompts on LEA-wide and schoolwide actions, limited actions, and concentration grant add-ons under the “Increased or Improved Services” section. Thank you also for mandating that metrics be identified. This will improve transparency and accountability in the LCAP process, and ensure that educational partners may clearly identify which specific metrics are connected to which contributing actions.

While these are welcome improvements, LEAs must also *analyze* effectiveness of LEA-wide and school-wide actions, as well as Limited Actions, in the tables. **We recommend an additional column that analyzes the effectiveness, or lack thereof, of the action since the specific metric was identified or prompts the final column to both identify the relevant metric and assess effectiveness.**

IV. Help LEAs comply with publication and mid-year reporting requirements and communicate to educational partners these basics as well.

The Equity Coalition recommends a chart on the LCAP on page 1, outlining the dates of public hearings, date of adoption, date of LCAP approval, weblinks to the LCAP and the mid-year update. This chart not only aligns with statutory requirements, e.g., where the annual update must include implementation data, it will also improve useability for *all* LCAP readers, including community members, advocates, and other educational interest holders, in better understanding the LCAP process and in showing that the conversation about school improvement with the community is ongoing and connected.

This chart would also satisfy Cal.Educ. § 52065, which requires that Board-adopted and COE-approved LCAP must be prominently posted on the homepage of the district website, and Cal.Educ. § 52062(a)(6), which mandates that midyear outcome data related to LCAP metrics and midyear expenditure and implementation data on LCAP actions be publicly reported on or before February 28 of each year and to any applicable advisory committee. LEAs need support with these basic transparency requirements.

Furthermore, this chart would help to ease the challenges faced by the public to track the LCAP process and plans. Unfortunately, LCAP information and data is often difficult to locate and in some instances are buried deep within a COE's website, making this vital information nearly impossible to find despite existing reporting requirements.

Public Advocates' [2023 LCFF Report](#), in which 72 district LCAPs were reviewed, found that 39 either did not post their LCAPs online at all or posted incomplete LCAPs after district board approval. Additionally, of the districts that posted their LCAPs online, only 37 of 67 districts (55%) clearly posted their LCAPs on their homepages or on their dedicated LCAP webpages. The remaining 45% of districts only posted their LCAPs in district board meeting agendas. As such, community members lacked access to LCAP drafts until meeting agendas were posted – and even then, the documents were buried in agenda portals and archives, making it difficult for community members to find them both during and after the LCAP development and public hearing process.

Lastly, please also refer to our embedded comments in the [draft LCAP Template and Instructions](#), as well as our [Equity Multiplier addendum](#) to increase transparency.

We appreciate the hard work of staff at the California Department of Education as we work together to revise and improve the LCAP according to SB 114 and our collective experiences in California's continuous improvement experiment. The LCFF Equity Coalition looks forward to continuing our collaboration to address the needs of California's most marginalized students and communities through the LCAP process.

Respectfully,

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Attachment: [Draft 2023 Template & Instructions \(with embedded comments\)](#)
[Addendum & Rationale: EM Transparency and Accountability](#)

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