

September 6, 2019

President Linda Darling-Hammond and Board Members
California State Board of Education
1430 N Street, Room #5111
Sacramento, CA 95814

RE: Agenda Item #2 – Local Control and Accountability Plan Template

Dear President Darling-Hammond and Board Members:

We write to comment on Agenda Item 2, the proposed revisions to the template for Local Control and Accountability Plans (LCAPs). As the core of the state’s accountability system under the Local Control Funding Formula (LCFF), LCAPs play a critical role in helping to ensure that California’s most vulnerable students are being well-served. As such, the LCAP template that Local Education Agencies (LEAs) utilize is vitally important and could be seriously improved.

First, the LCAP template should prompt LEAs to show that each of the services being funded and administered is principally directed and effective in meeting the needs of unduplicated students. The revised “Increased or Improved Services” section of the prototype invites LEAs to *summarize* the required legal analyses and justifications for its services that contribute to increasing or improving services for unduplicated students – omitting more precise direction that exists in the current template. Inviting LEAs to provide broad summaries of how they are providing LEA-wide or schoolwide services has been found insufficient in the CDE’s own Uniform Complaint Procedure (UCP) decisions. The prototype allows LEAs to pick and choose which LEA-wide or schoolwide services they would like to discuss and will likely lead to substantial omissions of critical LCAP investments. As just one example, in its 2019-20 LCAP, Los Angeles Unified School District attempted to justify its “School Autonomy” action – more than \$880 million of funding for high-need students (over 9% of supplemental and concentration dollars in the whole state) – in just three sentences.

Second, in the revised “Goals, Actions & Services” section, prospective and actual spending should be more transparent. While the prototype asks LEAs to specify the proportion percentage by which they are required to increase/improve services for unduplicated students and whether a service or action contributed to increases/improvements, more information about the nature of funding is critical, including clear identification of the school sites where the dollars are distributed. For example, some districts use grant money or federal funding to increase/improve services. Districts that already provide this level of transparency should be allowed to retain that in the new template. Additionally, LCFF statute requires that the new LCAP template include “an assessment of the effectiveness of the specific actions described in the existing [LCAP] toward

achieving the goals” (Cal. Ed. Code Sec. 52064(b)(7)). Unfortunately, the prototype lumps all actions under each goal and only calls for an assessment of the LEA’s overall progress toward its goals. This is highly concerning, as it does not promote an analysis of each specific action’s contribution toward a goal. The revised prompt should include: “How effective each specific action or service was in making progress toward the goal.”

Additionally, the revised “Stakeholder Engagement” section in the prototype is not an improvement. This section should prompt LEAs to describe the impacts of stakeholder engagement and where they reflected in the LCAP. This transparency is critical to maintaining informed stakeholder engagement that can support ongoing planning and continuous improvement. LEAs should also be prompted to provide a reference to the LCAP numbered action area that was impacted by stakeholder feedback.

Finally, the LCAP template should prompt LEAs to describe services for English learners and foster youth. Without a prompt in the template, we are concerned that LEAs may not communicate critical information on the specific actions regarding language acquisition programs and professional development opportunities to the LCAP reader.

We urge the Board to consider these recommendations and make the LCAP more transparent. California’s kids deserve better.

Respectfully,

Bill Lucia
President and CEO
EdVoice



Seth Litt
Executive Director
Parent Revolution



Katie Braude
Founder & Executive Director
Speak UP



Alma Marquez
Founder & Executive Director
La Comadre

