



California
Charter Schools
Association

January 3, 2020

Dr. Linda Darling-Hammond, President

State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

Via email only (sbe@cde.ca.gov)

RE: Item 2: General Comments – Revisions to the Local Control and Accountability Plan Template and Instructions

Dear President Darling-Hammond:

We represent organizations that advocate on behalf of students, parents, community members, and educators in our state's public schools. We are united by a common belief that all schools and districts must address long-standing inequities of opportunity and offer every student an excellent education that prepares them for college, career, and civic life. **We write to you today to encourage you to further amend the language in the LCAP template instructions to more specifically reflect a key recommendation from the California State Auditor regarding how an action is “principally directed” towards and effective in meeting the LEA’s goals for unduplicated students when expenditures occur on a “districtwide” basis.**

In its November 2019 report, the California State Auditor reported that the information in the reviewed LCAPs was not sufficient to determine whether the **“districtwide”** services on which they planned to spend supplemental and concentration funds would principally benefit intended students. When districts fail to clearly explain in their LCAPs how they plan to use supplemental and concentration funds on **“districtwide”** services to benefit intended student groups, they limit transparency and accountability. This undermines stakeholders’ ability to provide meaningful input into the LCAP development and partner with LEAs to ensure the use of supplemental and concentration grants meet the intended goal of being used to close opportunity and achievement gaps.

To address this lack of clarity, the State Auditor recommended that the State Board revise the instructions for the LCAP template to include, as best practices, key information from CDE’s stakeholder complaint decisions about how districts and other local educational agencies can successfully demonstrate that they have “principally directed” districtwide spending for services toward intended student groups.

We recognize that the staff recommendations in response to the State Auditor’s report indeed include additional instructions that reflect helpful information from the CDE’s Uniform Complaint Procedure (UCP) appeal decisions related to LCAPs. However, we believe the template being considered should include more specific instructions and examples of how LEAs can justify and explain how “districtwide” spending will principally benefit the unduplicated students.

We agree that illustrative and actual examples from resolved UCP complaints provide much more specific guidance for LEAs in meeting the letter and spirit of LCFF, and avoid future UCP complaints. To that end, with respect to proposed “districtwide” expenditures, we recommend instructions direct required justification for services on a districtwide basis distinguish between services directed toward intended student groups and services available to all students without regard to their status. For example, roaming math tutors or math coaches funded from a central unit in district headquarters and principally directed to help close math achievement gaps in targeted groups as opposed to districtwide salary increases.

In its response to the State Auditor, the State Board also stated that Board staff will work with the CDE to include this information on the “Frequently Asked Questions” section of CDE’s website related to LCFF and the LCAP, and to include relevant information from any future UCP appeal determinations. We appreciate this response and believe it will be helpful but should be serving as a complement to and expansion of the explicit directions in the LCAP template.

We request that the Board direct staff to make further adjustments to instructions on districtwide expenditures before adopting the final modified template and instructions. Thank you for your consideration.

Respectfully,

Ana Ponce
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Great Public Schools Now

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Senior Advisor
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