

October 31, 2013

To: Members, California State Board of Education

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**RE: *Local Control Funding Formula Regulations and Template.
Item 13. November State Board of Education Meeting***

The California School Boards Association (CSBA) is pleased to provide you with recommendations on the conceptual proposals for the Local Control Funding Formula (LCFF) expenditure regulations and the Local Control and Accountability Plan (LCAP) template. CSBA represents close to 1,000 school districts and county offices of education. Our members are deeply committed to successful LCFF implementation. During the summer and fall, CSBA has provided LCFF trainings to over 25 regional and local convenings of board members and leadership staff. Our recommendations here are based on real world feedback of members as they move forward transitioning to LCFF and on the expertise of CSBA policy, legislative and legal staff. Our goal is to provide comments to ensure the regulations and template reflect the goals of LCFF of local decision and responsible governance to address disparities in education opportunities and improve outcomes for California's public school students.

1) LCFF Regulations Concept honors the key precept of subsidiarity.

LCFF is a major transition to local control and decision-making. The proposed draft regulations recognize the need and provide flexibility for local communities to meet the needs and improve outcomes for students.

Definition of services

We recommend the following revision and addition to the definition of "services":

- "Services" as used in Education Code section 42238.07 may include, but are not limited to, services associated with the delivery of instruction, administration, **student support**, facilities, technology, other general infrastructure necessary to operate and deliver educational instruction and related services, **and anything the governing board considers a service that will entail spending more, providing more and/or achieving more. Services may include providing training and professional development for staff, parents, and**

governing board members to improve the quality of instruction and education provided to students.

Options for LEAs to Demonstrate Increased or Improved Services.

The three approaches of spend more, provide more and achieve more are workable. We appreciate the three options and want to see continued flexibility and a number of options from which LEAs can choose. We provide specific comments on the Provide more and Achieve more language below:

Section XXX3. (a)(2) Provide more.

We recommend the following additions to strengthen the recognition of the value of improving quality of services for unduplicated pupils. (Additional language is in bold and underlined).

Provide more, or improve, services for unduplicated pupils in proportion to the increase in supplemental and concentration grant funds. These services may include, but are not limited to, expanding **and/or improving the quality of** existing services, extending and/or **improving the quality of** learning time, increasing **and/or improving** learning options, or providing professional development opportunities.

The language in the examples for “provide more” should also be revised to include examples of “provide improved.”

Section XXX3. (a)(3) Achieve more.

We recommend providing rationale for the language in the last phrase of the Achieve more (a)(3) which states in part: “including a description of the increase in achievement for unduplicated pupils in proportion to the increase in supplemental and concentration grant funds.”

It will be helpful for LEAs to have more context for the assertion that gains in achievement are expected to be in proportion to the increase in funding. In some instances, the expected gains in achievement and other outcomes may be far more than proportionate to the increase in funding or they may not be in direct proportion to the increase in funding. LEAs and stakeholders may use this as a simple index and would benefit from greater clarity on using it as a meaningful measure of greater achievement.

We additionally recommend that the examples include activities that recognize the robust nature of the state priorities. The priorities represent a holistic approach to improving student outcomes and range from academic performance to include school climate, student engagement and parental involvement. We want to allow and encourage LEAs to demonstrate they are achieving more by improving outcomes for pupils on this wide array of priority areas.

2) LCAP Concept must be simple and accessible for the diversity of California districts and counties and their community stakeholders.

Guiding Principles

The guiding principles should include a principle of alignment with other plans, including and especially, federal program plans and efforts. We recommend adding this to either the guiding principle of “simple” or “transparent.”

LCAP Content Description

As provided in the LCAP statutory provisions of Education Code 52060(c)(1) and (2) and 52066(c)(1) and (2), the LCAP must include descriptions of goals and corresponding actions to improve outcomes for all students and each subgroup of students identified in the state Academic Performance Index. This means that LCAPs must address, in addition to the three categories of unduplicated pupils, significant subgroups of students with disabilities and ethnic subgroups. We recommend that throughout the LCAP, queries are posed to encourage consideration of outcomes for all students and all significant subgroups. The current version of the content focuses queries on the unduplicated categories.

The LCAP template should address and allow for goals and actions that are not solely measured and met by student success. For example, parental involvement goals and progress in meeting them, may be measured in ways not captured by measures of student success. We recommend that the LCAP concept be revised to address and pose queries that recognize these additional types of measures.

- Stakeholder engagement.
 - Instructions and Guiding Questions:
 - Add to the first point:
 - All the entities listed in statute that are to be consulted in development of the LCAP. EC 52060 (g) and EC 52066 (g) include: teachers, principals, administrators, other school personnel, local bargaining units, parents, and pupils.
 - Community based organizations. (CBOs)

Although the statutorily required groups are included in the “Other Considerations” column, in this first year of LCAP we recommend identifying these groups in the instructions and guiding questions to ensure there is explicit consideration of their consultative role.

- Other Considerations
 - We appreciate the inclusion of the question about how other governmental agencies are engaged in partnerships with LEAs. In our work with the City, County, Schools (CCS) initiative and in support of

Community Schools, we are encouraging local education agencies to find ways to collaborate with other governmental agencies and CBOs to better use resources and provide needed services to students and their families. These include school health centers, joint use projects and more.

- We recommend that “Community Based Organizations” be added to this point so that LEAs are encouraged to give explicit consideration to partnering with CBOs to improve student outcomes.

- Needs Analysis
 - Other Considerations
We recommend adding a question to examine what additional data is needed and what are possible sources? This question may be particularly relevant for those priorities for which there are not existing, complete or robust state data sources, e.g., parent involvement and school climate provide an opportunity for considerations of perception data and potential partnerships with other local government agencies and CBOs.

- Budget Information
 - Instructions and Guiding Questions
We recommend adding to the first questions a phrase to encourage explicit consideration of services for other significant subgroups in the LEA, e.g., students with disabilities and ethnic subgroups.

Thank you for the opportunity to provide these comments. Please don't hesitate to contact us if you have questions or would like additional information. We can be reached by phone at (916) 371-4691 or via e-mail at tburns@csba.org and aball@csba.org.