



November 1, 2013

President Michael Kirst and Board Members  
California State Board of Education  
1430 N Street, Room #5111  
Sacramento, CA 95814

RE: State Board Agenda Item #13 – November 7, 2013

Dear President Kirst and Board Members:

As you know, EdVoice has advocated for a rational and fair K-12 school funding system for many years. We applauded Governor Brown's leadership in picking up where his predecessors fell short in fighting the defenders of the status quo willing to blatantly ignore the systemic inequities that have persisted for decades in California's system of public school finance. Indeed, Governor Brown has championed and signed into law the most significant school funding legislation in a generation, promising to correct decades of inequity.

EdVoice was hopeful that the LCFF and companion LCAP scheme would fulfill the Governor's promises to provide extra help to the disadvantaged, English Learners, and foster care students, truly bringing the guarantee of the fundamental right to a basic education and equitable opportunity to learn in the California Constitution to every child in California Schools. Unfortunately, the proposed regulations and template in Item #13 fall far short of the Governor's promise and don't satisfy the protections of all students guaranteed by the Constitution.

Performance data of California's student achievement from any metric demonstrates California has not been able thus far to guarantee every child a public education opportunity that will ensure every student is prepared to succeed in college or a career. The objective evidence of outcomes for children from low-income families, English learners and foster youth, demonstrates they have been systematically failed by many school districts. Addressing the way schools are funded is important but only one piece of a systemic solution to ensure opportunities are changed for all the children of California.

EdVoice believes the recommendations before you on how to oversee implementation of the new funding system and its intersection with outcome goals fall short in ensuring the equity of opportunity for a quality public education that the governor promised. Instead, the package as a whole overemphasizes the finance shift toward greater flexibility but loses sight of the state's critical role in meeting the fundamental purpose for the change – to ensure every student has an equal opportunity to learn. Local flexibility is good but it isn't an excuse for the state to abdicate its responsibility in providing oversight and accountability for how districts serve their students.

EdVoice recommends additional focus on outcomes, greater specificity and uniformity on transparency on the minimally required information to be in legal compliance as critical to providing county superintendents and the state with actionable criteria to monitor and hold districts and schools accountable for meeting goals for student outcomes and parent engagement. Explicit guidance on these outcomes in the LCAP template and within the statewide accountability system can serve this purpose. But the proposed regulations associated with “Achieve more” standard, which was not even in the statute, do not ensure districts are addressing the historical abuses of inequitable opportunities to learn that have prevented so many students from achieving their full potential, nor does it meet the law’s requirement to “increase or improve services for unduplicated pupils in proportion to the increase in funds apportioned.” The path forward cannot go back to an absurd statewide standard of a one point increase to satisfy growth targets.

EdVoice also has significant concerns about how the state will ensure districts have helped all subgroups of students to achieve more. The proposal lacks clear measurable outcomes in most of the eight state priorities – particularly as there will be no data from statewide academic assessments in the 2013-14 school year. Without consistent state level measures and the outcomes being locally defined, it is critically important to provide guidance and credible accountability that those local measures be meaningful and consistent with the Governor’s promise.

Furthermore, when it comes to the extra resources for disadvantaged students, whether using a “spending more” or “providing more” scale, the regulations should provide more explicit guidance, particularly as it relates to transparency of how funds are spent to close achievement gaps and allowable school-wide and district-wide activities. By leaving it to the LEAs to define for themselves, there is significant potential for abuses in districts where the neediest students, with disenfranchised parents or no parents, who have generated the resources, will not benefit from them.

If the Local Control and Accountability Plan (LCAP) template is to reaffirm Governor Brown’s message, it shouldn’t ask IF a district has defined specific goals to address the unique needs of low income, English learners and foster youth but WHAT are its goals. Omissions of mandatory statutory provisions must be grounds for automatic denial by county superintendents. The language on performance must be stronger – requiring measurable improvements rather than the current “noticeable” improvements. And many of the “Other Considerations,” which highlight concerns about underserved students central to the Governor’s promise, must be equally weighted, rather than an after-thought.

Furthermore, the proposed template does not provide guidance on necessary transparency about site-specific needs, goals, services or performance. Any thoughtful district plan would incorporate the different needs at specific schools based on the proportion of disadvantaged students. Including disaggregated data in the LCAP template accordingly, including the budget, by school and program expenditures targeted to address the needs of disadvantaged subgroups would allow parents and local stakeholders to assess the progress of district actions and promote parent and community engagement, which is mandated by the enabling legislation.

Michael Kirst, President

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EdVoice encourages the state to integrate this effort with the updating the SACS and CalPADS systems. It is critical that there is consistent and meaningful information for policymakers and the public.

EdVoice believes there is still opportunity to fulfill the Governor's promise to change the landscape of educational opportunities for California's neediest students but it is going to take more leadership from you to direct substantive changes to this first proposed draft of rules in order to realize his promise. If you have any questions regarding our concerns or would like to discuss our recommendations, please don't hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Bill Lucia".

Bill Lucia  
President & CEO