Local Control Funding Formula Regulations Feedback and Response

At the State Board of Education's November 6-7, 2013 meeting a preliminary draft of Local Control Funding Formula (LCFF) spending regulations and a concept for the Local Control and Accountability Plan (LCAP) were shared and time during and following the meeting was provided for extensive public input and comments. These comments included statements of support for the approach taken with the spending regulations and LCAP as well as several ideas for improvement. The revised regulations and LCAP will reflect significant changes based on the provided input. This document summarizes key issues identified from the public comment with responses to such feedback.

Key Issue	Response/Potential Change
LEAs should both be spending and providing more as it pertains to demonstrating increased or improved services for unduplicated pupils. A methodology for calculating proportionality should be defined.	Clarify that LEAs must demonstrate increased or improved services by both describing increased or improved services and spending. Add definitions for "increased or improved services." Allow for local options to demonstrate a proportional increase or improvement in services. Require that LEAs include with the Local Control and Accountability Plan (LCAP) an explanation of how the selection option fulfills the standards of proportionality.
Achieve more should be reconsidered for a variety of reasons: • The overall goal of the Local Control Funding Formula is achievement and it does not seem an appropriate measurement of proportional services for unduplicated pupils. • There are too many options for "achieve more" and some may not be a valid standard against which to demonstrate increased or improved services for unduplicated pupils.	Recognize within the scope section of the regulations the intent of LCFF to include and address achievement. In addition, the LCAP clearly relates resources to performance expectations through state priorities.
If the initial LCAP (planning for 2014-15) references prior year, LEAs may not be able to recognize services added in 2013-14 as increased and/or improved.	Consider whether changes are necessary to accommodate practical implementation needs.
Schoolwide, districtwide, countywide charterwide lacks specificity.	Clarify definition of these terms with regards to funding use and require that when such designations are made that an explanation be included in the LCAP that meets specific requirements.

Key Issue	Response/Potential Change
The flexibility afforded to charter schools under the former funding structure (i.e., charter school block grants) should not be diminished under LCFF.	The statute requires that charter schools be treated similarly to districts and county offices of educations. The flexibility previously in place for charter schools will be considered when developing regulations.
The LCAP should require LEAs to report data and goals for each school site and subgroup.	The LCAP requests that LEAs identify specific school and subgroup level goals and data that reflect unique needs and circumstances. The LCAP would support simplicity and transparency by allowing LEAs to aggregate data and goals that are the same for multiple school sites, but specify any data and goals that are unique to a school site.
School-level expenditures should be tracked through the LCAP.	The LCAP captures LEA-level information and may include, but does not require school-level expenditure details. Sites will continue to prepare Single Plans for Student Achievement to capture site-level plans and expenditures as required by federal law.
Evidence of stakeholder engagement (e.g., events/meetings, training, etc.) should be included within the LCAP.	The LCAP requests LEAs to identify specific actions taken to engage stakeholders and the impact such engagement has had upon the development of the LCAP. The LCAP would support simplicity and transparency by allowing LEAs to determine essential versus non-essential information.
The LCAP should include separate sections for all significant subgroups (e.g., low income, English Learners, foster youth, African American, students with disabilities, etc.).	The LCAP must include details regarding how the needs of all students, including those within significant subgroups, are met through a description of goals, services, and expenses. To aid in the coherent sharing of information and avoid duplication, LEAs will be allowed to organize this information in a manner that meets local communication needs. However, it is expected and required that the LCAP of each LEA address all significant subgroups.