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October 23, 2019

Ms. Jo Ann Isken, Chair
Dr. Ilene Straus, Liaison to the State Board of Education
California Practitioners Advisory Group
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

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

Re: Revisions to the Local Control and Accountability Plan Template and Instructions

Dear Ms. Isken and Dr. Straus:

We thank the Board and CDE staff for sharing interim drafts of the Local Control and Accountability Plan (LCAP) Template Revision Prototype and instructions to get feedback from interested stakeholders. Additionally, we appreciate that the LCAP Template and instructions adoption will be delayed until January 2020. At this point we believe providing the extra time for input from stakeholders will result in an improved template. We continue to have the same concerns which we raised with the Board at its September 2019 meeting, as well as additional comments focused mainly on the initial draft of the template instructions that were not available prior to the September Board meeting.

Below we highlight in detail three key pieces of feedback on the template and instructions, that reflect our strongest concerns. This letter will then identify numerous additional areas where specific improvements could be made to the template.

THREE CRITICAL DEFICIENCIES
Major Progress on "Increased and Improved: Services Requirements" (and related instructions)
The improvements to this section are significant. The change in the prompt makes it clear that the use of local educational agency (LEA)-wide or school-wide flexibility must ensure that the justification of the use of this flexibility, and the related actions, will ultimately be principally directed to meeting the needs of Low-income students, Foster Youth and English Learners (ELs). We encourage the Board to maintain these changes and suggest the following additional edits which would ensure that not only were the needs of these populations considered, but they were prioritized, and the actions were directed to support these groups.

> "**For each action being provided to an entire school, or across the entire school district or county office of education, provide an** explanation of how the needs of English learners, foster youth, and low-income students were **prioritized** ~~considered first before selecting~~ each action ~~being provided to an entire school, or across the entire school district or county office of education~~, and how these actions will be effective in meeting the goals for these students."

While the instructions for this prompt are very clear that this justification must be provided "for each action," the template prompt could help districts make sure they meet this requirement for each action by creating additional cells in the prompt.

Action #. [Provide Description here]
Action #. [Provide Description here]
Action #. [Provide Description here]

To date, districts have done a poor job of providing this justification for each action in their LCAPs, which has been a sticking point for the equity community. The proposed delineation also would help to focus the attention of the county offices of education (COEs) as they review their district's LCAPs.

"Goals: Measuring and Reporting Results"
We encourage the CPAG members to consider the timing of the LCAP adoption (May/June annually), and the timing of the release of data for the state indicators (Fall to December annually). These recommendations apply to both Option A and Option B.

- **Clarify Baseline.** The "Baseline" instructions should clarify that the most recently available data should be reported (in most cases for the June 2020 LCAP, this will be 2018-19 data and not 2019-20 data – as currently appears in the instructions).
- **Add Column "Actual Outcome for 2019-20."** We recommend including an additional column that would be reported as part of the annual update for the June 2021 LCAP update and reflect actual outcomes. In June 2021 (the first LCAP update), districts won't yet of have any data for the "Actual Outcome for 2020-21", so there will be no data reported in the update as it currently stands. The 2020-21 actuals will be available for the second LCAP update in June 2022. Thus, for the first LCAP update, we recommend adding a data reporting column "Actual Outcome for 2019-20" that can be used to inform any adjustments that a district would make to its action or implementation plan.

"Goals: Actions" – Add Separate English Learner Prompt
Consistent with the *2018 Budget Trailer Bill* requirements, the proposed instructions state that all LCAPs with a numerically significant EL subgroup must include specific actions in the LCAP. The instructions are unclear in the guidance for how a district would let stakeholders know which specific actions are meeting this requirement. We believe it would be cleaner to create a separate prompt in the LCAP template to address this requirement instead of having it separated in the "Goals: Actions" instructions. Under the current approach, a parent or stakeholder interested in actions targeted for ELs would have to review the details of every action to try to figure out whether the requirement for ELs had been met and how it was met. If a separate prompt were created, a concerned parent could determine this much quicker and have a more holistic perspective on the proposed actions.

Two approaches could be used to effectively meet this statutory requirement:

- Approach 1. In the "Focus Goal(s)" section, add an additional subsection:
  "**Actions Supporting Language Acquisition Programs and English Learner Related Professional Development**" - Include Action "#, Title, Description, Total funds, Contributing" prompt boxes for this subsection
- Approach 2. In the "Actions" subsection add an additional prompt similar to the "Contributing (Y/N)" prompt **"Language Acquisition Programs and English Learner Related Professional Development (Y/N)"**

Additionally, we recommend that the SBE add prompts that can be framed as "LEAs are encouraged to" around specific actions and services that are being providing to Foster Youth and similarly for Low Income Students. We believe this is warranted given the requirement to "Increase and/or Improve Services" for these unduplicated student groups and that it will allow LEAs to receive credit for work they are doing to support these students.

SECONDARY CONCERNS WITH THE DRAFT TEMPLATE & INSTRUCTIONS
Below we offer additional comments, which follow the order in which they appear in the template and accompanying instructions.

"Plan Summary" Section
"Reflection: Identified Need"
For this section, we encourage edits to the instructions to do two things:

- The current instructions focus only on areas with red/orange performance or achievement gaps as defined. We hope that over time, fewer districts will have very low performance or achievement gaps. At the same time, every district should be able to identify some area that it has identified as an area of need that will then be reflected later in the LCAP document as the focus of its goal setting and actions. For those districts that don't have very low performance or achievement gaps, we recommend adding an instruction such as **"If your LEA doesn't meet any of the criteria above, please describe the areas that your LEA has identified as its area of need and the steps the LEA is planning to take to address those needs."**

- The section should link to the district support and assistance process. It should let the plan reader know if a district is receiving support and assistance from its county office of education, for how many years it has been receiving assistance, and for which subgroups and what indicators. We recommend adding the following instructions to prompt: **"If your LEA has been identified for district differentiated support, indicate the number of years the district has been receiving support, and identify the subgroups and indicators that have led to this identification."**

"Comprehensive Support and Improvement (CSI)"

- **"Schools Identified":** The instructions should require that along with identifying which schools qualify for CSI, the LEA should additionally report the indicators that led to its identification (red/orange designations for which indicators). We recommend amending the instructions as follows: "Schools Identified: Identify the schools within the LEA that have been identified for CSI, **and the indicators and Dashboard color ratings that resulted in the schools being identified**.

- **"Support for Identified Schools":** The instructions provide an opportunity to integrate the CSI planning process and the LCAP planning process. Ideally, actions delineated in the LCAP should support these CSI schools. We recommend adding the following to the instructions. **"What actions in the LCAP support the CSI plans?"**

"Increased or Improved Services" Section
"Increased Apportionment"
The revised template states "Increased Apportionment based on the enrollment of Foster Youth, English Learners and Low-income students". It is unclear what this is in reference to: does this "Increased Apportionment" refer to the _increase_ in Supplemental and Concentration grant funding from the prior year, or does it reflect the _total_ Supplemental and Concentration grant amounts? This section could be rephrased to clarify the meaning. A suggested rephrasing would be to simply state **"Total Supplemental Grant and Concentration Grant Apportionment based on …."** or **"Total Apportionment based on the enrollment of…"**

Additional LCAP Requirement
Require LCAP to Be Machine Readable PDF
In past LCAPs, some districts have converted their LCAP plans into a non-readable format, which means that parents who were interested in a specific issue were not able to perform a key-word search, but instead needed to read the entire document to find what they were looking for. If the document were required to be machine readable, then a stakeholder could easily search the document for specific areas of interest, for example, searching for English learners or restorative justice.

In closing, we note that the LCAP is seen one of the central communication tools between a district and its stakeholders; as such, the work of drafting the template appropriately is of great importance. Thank you for undertaking this work and considering the input of interested stakeholders in the revision process.

Sincerely,

Robert Manwaring
Senior Policy and Fiscal Advisor

cc: Members, California Practitioners Advisory Group
        Members, State Board of Education
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