

EXHIBIT D

comments; and to hold a public hearing before the Board approves the District's allocation of these funds, as required by Education Code § 52060(c).

II. Explain the \$3.5 Million Decrease in Supplemental and Concentration Funding

The District's Second Interim Budget Report shows that the District received approximately \$3.5 million less than originally projected in supplemental and concentration funding. (Second Interim Budget Report at 3, Jan. 31, 2015.) We would appreciate further clarification on why the District experienced such a sharp funding decrease. We note that enrollment declined by 324 students, but this does not seem sufficient to explain such a significant reduction. In addition, the District seems to have used a different state target gap closure rate—21.76% rather than 29.15%—than the California Department of Education certified in 2014-2015. The LCFE regulations require all LEAs to use the gap closure percentage set by the state. (5 C.C.R. § 15496(a)(4).) Assistant Superintendent Sheri Gamba requested our questions in writing, and we provide them here.

- Why did the District use a different target gap closure rate in the interim report than it did in its original budget projections, especially as the California Department of Finance certified the 29.15% funding rate months before the interim budget report?
- Why did received supplemental and concentration funding decrease by \$3.5 million and base funding decrease by \$2 million (Interim Budget Report at 3), when supplemental and concentration funding is calculated as a percentage of base funding, and the District's base to supplemental/concentration ratio was approximately 88% to 12%?
- By our calculations using the District's numbers, supplemental and concentration funding decreased by \$3.5 million, while base funding decreased by \$2 million, a total decrease of \$5.5 million. Why, then, did the district report a total LCFE funding decrease of only \$800,000? We additionally note a discrepancy between the LCFE total reported to the District in Budget Schedule 1 of the Interim Budget Report and Assistant Superintendent Gamba's presentation to the Board. Both the executive summary and schedule 1 show the District receiving \$216,832,664; the Assistant Superintendent's presentation shows the District receiving \$212,192,619. We would appreciate any explanation the District could provide.

III. Include Base Funding in the LCAP

We reiterate our request that the District revise its LCAP to include LCFE base funding, as stated in our May 11 letter. In an email of June 25, Public Counsel provided examples from other districts that included base funding while maintaining the LCAP's readability. We encourage the District to develop similar practices that will promote the LCAP's comprehensiveness and transparency. With its excellent LCAP Data Dashboard, WCCUSD is ideally positioned to be transparent about its plans for all LCFE dollars, as well as other funding sources.

IV. Clarify How Certain Supplemental and Concentration Expenditures Meet LCFF Regulations

Because WCCUSD has a high concentration of unduplicated students—about 75% of its student population falls into one of the three unduplicated subgroups—the District can more flexibly spend its supplemental and concentration funding on district-wide services. However, per LCFF regulations, it must still justify how district-wide spending is “principally directed” and “effective” in “increasing or improving” services for unduplicated pupils specifically. (5 C.C.R. § 15496.) We have outstanding concerns, which we raised to the District in prior letters and testimony, about whether several action items in the LCAP meet this standard. Specifically, we would call the County’s attention to the following:

- **Section 3 Justifications:** In Section 3, the District must justify why all its supplemental and concentration expenditures meet the LCFF regulation’s “principally directed” and “effective” standard, including actions taken with supplemental and concentration funding for the benefit of “all” students. Currently, Section 3 gives summary explanations of WCCUSD’s goals and how much the district plans to spend, often omitting how an action will benefit unduplicated pupils specifically. The District must provide an explanation for each expenditure of supplemental and concentration funding allocated on a schoolwide or districtwide basis, such as:
 - *Professional development days* (\$2,570,300, p. 14): Parents are particularly concerned about the need for professional development in cultural competency, alternatives to discipline, and prevention and handling of sexual harassment and misconduct complaints at schools. We would appreciate further elaboration on the kinds of professional development provided under this action item to ensure this action is principally directed toward unduplicated pupil goals and effective in meeting those same goals.
 - *Decentralize funding for school-sites* (\$3,000,000, p. 14): Although school-site spending is an appropriate use of LCFF funding, supplemental and concentration funds must nevertheless be spent on increased or improved services for high-needs students. We would appreciate further insight into how WCCUSD’s individual schools will use this \$3 million in supplemental and concentration funding consistent with the aforementioned regulatory requirements. Antioch USD, for example, includes a useful appendix detailing school-site expenditures so that community stakeholders can ensure that individual schools’ supplemental and concentration spending reflects local priorities.
- **Preexisting Actions Newly Funded with Supplemental and Concentration Dollars:** The District has chosen to allocate supplemental and concentration funding to pay for some actions that were funded using other sources in previous years, and we would like an explanation of the choice to use a different source. The change of funding sources poses transparency problems in light of the District’s decision to include only supplemental and concentration funding, as it is unclear whether the District is spending Title I and bond funds in other ways, or whether these revenues have disappeared for 2015-2016. The District is additionally required by the LCFF regulations to explain how supplemental

and concentration funds are increasing or improving these services for high need students, and no such explanation is provided. For example:

- *Whole school intervention model (Stege Elementary)*: The District spent \$400,000 in Title I and \$49,066 in supplemental and concentration funds in 2014-2015 (pp. 25-26) but allocated \$552,255 in supplemental and concentration funds in 2015-2016 (p. 10). (The amount spent in 2015-2016 is likely higher because the District combined two of last year’s actions/services into this action service—the other action/service was “Implement the full-services learning center model” for which the District spent \$91,301 in 2014-2015 (pp. 26-28).)
 - *Expand innovative STEM opportunity – FabLab (located at Kennedy High School)*: The Fab Lab was funded in 2014-2015 by \$167,000 in bond funds (we assume—the District allocated \$750,000 in bond funds and did not explain where the \$167,000 came from) (p. 24) but will use \$300,000 in supplemental and concentration grants in 2015-2016 (p. 10).
- Disconnect Between Expected Outcomes and Actions/Services: Some expected annual measurable outcomes do not seem to bear a close relationship to the planned actions (e.g. Goal 2, p. 14; Goal 5, p. 21). For example, it is not clear how “extending the workday for elementary clerk typists” and “providing an adaptive curriculum for special-needs students” will “increase the percentage of facilities with good/exemplary rating,” one of the expected outcomes under Goal 5 (p. 21). Goal 2, meanwhile, includes money for more professional development, but again it is not clear how that relates to the expected outcome of improving teacher retention (p. 14). Without further information about the fit between the District’s plans and the expected outcome, there is no way to measure whether the actions taken were effective in improving services for high-needs students.
 - Actions/Services Lacking Detail Needed to Ensure Regulatory Compliance and Measure Progress: At present, the LCAP describes these actions in vague or unclear terms, leaving us unsure whether they meet the “principally directed” and “effective” standard or unable to measure the success of such actions as they are implemented. As we stated in our May 11 Letter, actions/services should be stated with sufficient detail to communicate to stakeholders how the fund will be spent and ensure the District’s allocations meet regulatory requirements. We seek clarification of the following actions:
 - *English Language Learner assessments* (\$934,585, p. 10): The action item, “continue to support and improve services for English Language Learner assessment,” does not provide concrete details of the District’s plans for English Learners. Without more information, parents cannot evaluate the District’s actions and hold it accountable for improving outcomes for ELLs.
 - *Restorative justice, BEST, Toolbox & Mindful Life and Selena Jackson practices* (\$416,632, p. 16): We appreciate the District’s commitment to improving school climate, but we would like greater detail on this action item to reflect how much the District will spend on each strategy, whether this is for training or salaries, and at which school each strategy will be implemented. This level of detail is critical for parents to understand what is being done to transform school culture at their

child's school-site and is necessary for the district to monitor whether investment in any particular strategy is adequate to meet the district's goals from year to year.

- *Campus safety officers and psychologists* (\$3,389,265, p. 18): The district will spend \$3,389,265 recruiting more campus police and psychologists. With it, the District intends to improve social-emotional support and student safety. This large sum for services that benefit all students, such as safety officers, raises concerns that the spending is not “principally directed” toward high-needs students. We ask the District to break out the spending to clarify how much will go toward SROs and how much toward psychologists (as Dr. Harter did in his letter of June 2 explaining last year's expenditures), as well as explain how these actions will help the district meet its overarching goal of improving student engagement and climate, and more specifically decrease chronic absenteeism, increase graduation rates, and reduce out-of-school suspensions.
- *Implement the English Language Learner master plan* (\$1,601,840, p. 18): The District should provide more concrete details of how it will go about implementing the master plan, especially for so large an expenditure. For example, will implementation include new staff, new bilingual classrooms, or new standards? Parents need this information in order to evaluate the District progress toward implementation.
- *Augment special education services* (\$3,200,000, p. 18): The District proposes to spend \$3.2 million in supplemental and concentration funding to provide special education services for high-needs students, but it uses vague language to describe its plan (“Augment Special Education services provided to LI, EL, FY”). More clarity on this expenditure is required to understand exactly what actions the District plans to take.

Amending the LCAP to address these concerns would lead to a more inclusive, transparent document. Please send us some dates and times you are available to meet in the next two weeks. We hope this conversation will lay the foundation for a beneficial partnership in the coming year as we work with WCCUSD to improve all students' education.

Sincerely,

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Healthy Richmond Steering Committee

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