



KEEPING THE PROMISE OF LCFF:

Key Findings & Recommendations

After Two Years of LCFF Implementation

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I. INTRODUCTION

“Today, I’m signing a bill that is truly revolutionary. We are bringing government closer to the people, to the classroom where real decisions are made and directing the money where the need and the challenge is greatest. This is a good day for California, it’s a good day for school kids and it’s a good day for our future.”

Gov. Jerry Brown, July 1, 2013 on signing LCFF

Students, parents and advocates in California organized for nearly a decade to make a more equitable student funding formula — one based on student need — a reality. Signed into law by Governor Jerry Brown in July 2013, the Local Control Funding Formula (LCFF) places California at the forefront in implementing a school funding formula weighted to student need. Now, after two full years of implementation in which Public Advocates staff have worked intensely in collaboration with students and parents engaging in development of their school district’s Local Control Accountability Plans (LCAPs), we pause to share some key lessons, challenges and opportunities that are emerging in district LCAP development.

Over the past two years, Public Advocates teamed up with youth leadership organization Californians for Justice to analyze LCAPs in several districts across the state and then led in-depth review sessions with students, parents and other stakeholders to evaluate the quality of information and strategies in the local plans.¹ In addition, our staff has been embedded in a number of districts throughout the state to support capacity building of students, parents and also district staff to understand the opportunities and legal obligations of the district and incorporate community voice in the LCAP process. Finally, we have also reviewed LCAPs for additional districts, some in collaboration with the ACLU of California, with an eye especially towards understanding whether districts are meeting the minimal legal obligations of the new law, especially when it comes to increasing and improving

services for high-need students.² Based on these reviews, we have also engaged with school districts and county offices of education (COEs) directly about LCAP requirements and, in some instances, helped lead trainings of county and district LCAP leaders. This report draws on lessons learned from analyzing dozens of LCAPs in these multiple contexts.

The intent of LCFF is that the LCAP serve as a living, breathing, continuously improving “comprehensive planning tool.”³ Local educational agencies (LEAs) must develop and implement these plans with active involvement of school community. Yet ongoing, strategic planning and effective community engagement are two things school districts have not historically been asked to do. Faced with these new expectations, it is easier to treat the LCAP as an exercise in filling in boxes and checking off stakeholder compliance. Instead, all those committed to transforming our educational system to serve our high-need students must invest the time to figure out how to make the new law work as it was intended to fulfill the promise of equity, transparency, local accountability and meaningful community engagement.

At the heart of the new law is a basic bargain that in exchange for flexibility, districts would be transparent and accountable to local stakeholders through a rigorous community process. Districts and other LEAs have just been relieved of a slew of bureaucratic compliance mandates tied to dozens of old state categorical programs. Those mandates required hours of accounting, tracking, reporting and

general “bean-counting” of dollars spent. They limited district spending to the multiple, mostly narrow confines of the various restricted funds called categorical and carried, as well, the threat of losing funds if someone bean-counted wrongly. Now districts can meld the old pots together to spend the funds much more flexibly, free from the strict and complex prerogatives of Sacramento. The deal was that in exchange for dropping all of that work and for having all this new flexibility, districts would be fully transparent around their spending, direct increased resources to high-need students, and engage community stakeholders in spending decisions.

Unfortunately, many districts are still continuing to approach the exercise of developing their local plans as one of compliance instead of continuous improvement. As a result, district LCAPs are falling short of their promise to bring local

transparency and accountability to public education. More concerning is the very real possibility that students will miss out on the equity promise at the heart of the new funding law because districts continue to spend funds the same way they always have with minimal reflection on how they are making a difference for high-need students and scant local input.

With that said, we see some sure signs of hope. For those districts making a serious investment in shifting the culture of their schools and district operations to incorporate meaningful community engagement and candid reflection, transformative change may be possible. It will be years until we can truly assess whether the strategies adopted in the last two years will bear fruit, but these green shoots deserve recognition and celebration.

II. KEY FINDINGS ON LCAP CHALLENGES & OPPORTUNITIES

A. Districts are not providing the level of transparency promised in exchange for increased spending flexibility. Most districts are missing the opportunity to use the LCAP as a comprehensive planning tool for continuous improvement.

B. Many districts and LEAs are not yet fulfilling the equity promise of LCFF:

1. Districts are not properly justifying their use of supplemental and concentration funds by describing how they are *principally directed* and *effective* to serve the high-need students who generate those dollars. Low concentration districts are not explaining how districtwide uses of funds are the *most effective use* for high-need students.
2. Many districts fail to clearly explain how they are meeting their minimum obligation to *increase and improve services for high-need students* as compared to all students in proportion to the additional funds these students generate.
3. Some districts appear to significantly underspend supplemental and concentration dollars in the LCAP year compared to promised spending without explanation and appear to fail to carry over that obligation to subsequent years.
4. LCAPs generally fail to capture how supplemental and concentration dollars are being spent at school sites.
5. Charter schools appear to be spending supplemental and/or concentration funds without any oversight whatsoever.

- C. Districts varied as to whether they adopted robust annual measurable outcomes, and some omitted legally required metrics to show how they are performing in the eight state priorities.
- D. Most Annual Updates we reviewed lacked the transparency necessary to serve as a robust tool for reflection and continuous improvement.
- E. Too many districts approach LCAP community engagement as a checkbox, instead of a meaningful exercise in shared decisionmaking. But those districts that invested resources and partnered with community-based organizations are sowing seeds of real cultural transformation that can lead to increased student achievement.

III. RECOMMENDATIONS

For state actors, including the State Board of Education, the California Department of Education, the California Collaborative for Educational Excellence, the Governor and the Legislature:

- 1) For “local control” to work, the state must **invest to build capacity of school districts and stakeholders** to make real the promise of local accountability **and meaningful community engagement**.

 - a) We especially support more resources focused towards community engagement for LCAP development at both the district and school site.
 - b) We also encourage stronger guidance on substantive measures of parent engagement that demonstrate efforts at shared decisionmaking and engaging parents in programs for high-need students as the Parental Involvement state priority requires.
 - c) The state should provide more guidance in terms of best practices and model engagement timelines that promote meaningful stakeholder input and engagement.
 - d) The state should also make clear that school districts are obligated to provide translation and interpretation for engagement of non-English speaking parents and caregivers in LCAP development not just in light of the Education Code but also federal civil rights guidance and the requirement for community engagement and consultation.
 - e) The Legislature should clarify that districts must post their LCAP and relevant summaries in languages other than English that 15% or more of their students speak at home and the state must determine ways to support districts of differing capacities to meet the unique translation and interpretation needs of their stakeholders to ensure meaningful engagement.
- 2) The State Board of Education should **issue guidance to** County Offices of Education and Local Educational Agencies that will **facilitate fiscal transparency and local accountability** by:

- a) Clarifying that an LCAP is not acceptable under LCFF if it does not capture all the district's actions and expenditures for all students on the eight state priorities and thus reflect nearly all LCFF funds the district receives.
 - b) Clarifying section 3A and 3B requirements in the form of model sections, hypothetical examples, and clear instructions for reviewing and approving Section 3 of the LCAP, which plays a critical role in ensuring LEAs meet their minimum proportional spending obligation to high-need students.⁴
 - c) Clarifying that LEAs that fail to carry out the promised actions and services necessary to meet their Minimum Proportionality Percentage in the LCAP year must carry forward the unspent supplemental and concentration funds into the following fiscal year to make up for the LEA's failure to meet its minimum obligation to increase or improve services for high-need students in proportion to the funds generated by those students.
 - d) Encouraging adoption of the best practice among districts to institute internal resource codes to facilitate accurate reporting of supplemental and concentration spending especially for purposes of calculating their Minimum Proportionality Percentage obligation.
 - e) Providing model examples of Annual Updates and LCAP narrative summaries that can supplement the LCAP, including an executive summary and summaries specific to student subgroups. (The California Collaborative for Educational Excellence should also support this effort.)
 - f) Sharing best practices for supporting school site governance, shared decisionmaking and models for reporting in the LCAP and Annual Update on site-level supplemental and concentration spending.
- 3) The State Board of Education should adopt common sense **revisions to the LCAP Template** that clarify the obligations of Local Educational Agencies while improving the accessibility and transparency of information for community stakeholders. Such revisions should include:
- a) **For Section 1: Stakeholder engagement**
 - i) To facilitate understanding of how stakeholder input impacted district planning, where the district reports in Section 1 that stakeholder input impacted an action, there should be a reference — or a hyperlink in an electronic format — to locate that action in Section 2 of the LCAP.
 - b) **For Section 2: Annual Update**
 - i) Include a box in the Annual Update section or Section 3 indicating the total amount of supplemental and concentration funding the district needs to spend in the next year as a result of failing to fulfill its Minimum Proportionality Percentage obligation to its high-need students.
 - ii) The current template makes it difficult to see how an action is developing from one year to the next. Move the Annual Update ahead of the actions for LCAP Year 1 and/or consider a design that would integrate on the same page the development of a strategy from year to year, starting with the Annual Update, up through years 1, 2 and 3. An electronic design with expandable links would be necessary to facilitate this. To enable such understanding in a hard copy LCAP and help reduce length, the Annual Update could be integrated on the same page with Year 1, while actions for Year 2 and 3 could be reported together on the same page.
 - iii) Allow for charts or other graphic depictions of data to show expected versus actual annual measurable outcomes in the Annual Update, as well as future target outcomes for LCAP Year 1.
 - c) **For Section 2: Goals, Actions & Expenditures**
 - i) Clear instructions in Section 2 of the LCAP that districts should distinguish between the use of LCFF Base versus Supplemental and Concentration funds.

- ii) Require districts to indicate where an action is new or merely continuing from prior years to facilitate clearer reporting of how the district is increasing or improving services for high-need students and all students.⁵ *(See also recommendation 3.b.ii above regarding integrating reporting on Annual Update through LCAP Year 3.)*



- iii) Require an appendix spreadsheet of LCAP spending by goal and action item to facilitate fiscal transparency. Ideally, the district could post an electronic format of this spreadsheet so that it is operable by stakeholders to sort for relevant information.⁶
- iv) In an electronic format:
- (1) Under each goal provide a concisely worded list of hyperlinked actions and expenditures, which expand for more information on each action.
 - (2) Code actions so that stakeholders can sort them by student subgroup and applicable state priority.
 - (3) Facilitate fiscal transparency, making it easy for stakeholders to see how all funds in the LCAP are being spent across a range of relevant categories, including:
 - (a) Base, Supplemental and Concentration, and any other resources that are funding actions in the LCAP;
 - (b) By LCAP goals, by actions specific to student subgroups, including English learners, foster youth, students with disabilities and other significant subgroups.
 - (c) For supplemental and concentration dollars, sorting by districtwide and schoolwide expenditures, with school-level expenditures further described by school.
 - (4) The current PDF requires manual input of the numbers across pages of actions and services to sum up the spending. An electronic template should have capacity in Section 2 and the Annual Update to sum up and categorize spending and actions within goals or for particular student subgroups, and compare total planned versus total estimated actual spending in the Annual Update as well as show how proposed expenditures change year over year. This is a critical fiscal transparency mechanism that is currently lacking.⁷

d) For Section 3: Use of Supplemental & Concentration Grant Funds & Proportionality

- i) In Section 3A on supplemental and concentration spending, the template should be revised to explicitly state the applicable regulatory requirement for each separate districtwide and schoolwide use of supplemental and concentration funds (rather than referring obliquely to legal code provisions). As such, the template should clearly state that districts must identify each proposed use and justify:

- (1) How those funded actions are *principally directed* to meet the district's goals for high need students, and
- (2) How those funded actions are *effective* to meet those goals, or for districts or schools below the concentration threshold, how those funded actions are *the most effective use of funds and the basis for that determination*.

A best practice that we observed in some LCAPs was the use of a table or spreadsheet to list each action in a way that made it easy to reference where the schoolwide/districtwide action appeared in section 2 and then separately justify each expenditure.

- ii) In an electronic format, automatically populate each districtwide/schoolwide action supported by supplemental and concentration funds from Section 2 into Section 3 to facilitate clear explanation on each of these actions.
- iii) *See recommendation 3.b.i above.*

e) **Summaries, Appendices and Navigation of the Document**

- i) Provide a plain language glossary of terms that steers away from technical jargon and explains any key district programs that may be abbreviated in the LCAP.
 - ii) Require a table of contents that summarizes the content of the LCAP.
 - iii) In an electronic format:
 - (1) Include an interactive table of contents and/or index to help understand the structure of the LCAP and top-line goals and strategies with progressive layers of links to more detail for the more interested and engaged reader.
 - (2) Provide for seamless alignment and connection of the various sections of LCAP through hyperlinks. Ideally, the electronic template should eliminate stakeholders' need to page/scroll through a long LCAP to find information. (*See recommendations 3.a.i and 3.b.ii above.*)
- 4) The state should support the development of **improved budgeting systems** and tools to help districts transition from their pre-LCFF accounting systems to one that enables them to link their budget line items to the specific actions in their LCAPs and share model tools in this regard. The SBE and/or CCEE should survey the work that is already being done on this front by individual districts, advocacy organizations and third party consultants to identify best practices.
 - 5) We recommend that the state Legislature and the SBE encourage school districts to **update the data and its target annual measurable outcomes** in the Annual Update and LCAP in the fall after districts have new data on the measures. This would assist districts to act in response to key outcomes and plan as a part of a cycle of continuous improvement.
 - 6) The state should revise the current architecture for **charter school LCAP review** to clarify how charter schools will receive the necessary support to develop LCAPs and how the state will ensure that the significant supplemental and concentration funds being sent directly to charter schools are being properly spent in service of high-need students consistent with the law. The state will also have to invest in the capacity of charter authorizers to review charter school LCAPs and use the evaluation rubric to provide support to underperforming charter schools as the law requires.
 - 7) The State should consider **authorizing County Offices to disapprove a portion of the LCAP** and the corresponding LEA budget inasmuch as the current "all or nothing" approval option has made COEs reluctant to fully enforce LCFF requirements. With "line item" disapproval authority, COEs could more effectively correct significant LCAP shortcomings that nonetheless do not warrant wholesale rejection of a

district's operating budget. As an initial interim measure, COEs should have express authority to disapprove LCAPs that reflect less than 50% of LCFF funds.

For County Offices of Education, which are the primary source of support and oversight to school districts in LCAP development and approval:

- 1) Ensure that school districts are showing their full education program as it relates to the eight state priorities for all students. Where an LCAP contains very little of the district's overall education spending, and especially LCFF funding, the COE should support the district to improve.
- 2) Actively review supplemental and concentration spending and whether it is properly justified under LCFF regulations. Require justifications of principally directed, effective or most effective uses as applicable.⁸
- 3) Closely scrutinize vague descriptions of school-site spending and push for more clarity in how these funds are being spent in the LCAP and the Annual Update.
- 4) Engage in stronger support and monitoring of LCAP implementation to ensure that districts are leveraging their LCAP as a tool for continuous improvement, sharing data with staff, partners and stakeholders early on and seeking to implement the actions as planned. In addition, COEs should pay closer attention to the quality of reporting and explanation in the Annual Updates, especially regarding significant deviations in planned actions or spending.⁹
- 5) Inquire where you see significant discrepancies in planned versus actual spending, especially of supplemental and concentration dollars, without explanation, to determine whether the LEA has met its minimum proportionality obligation. Where that minimum obligation has not been met for the LCAP year, instruct districts to carry forward unspent supplemental and concentration dollars into the following fiscal year as part of its ongoing minimum obligation to high-need students.
- 6) To promote transparency and accountability, post questions for clarifications to and responses from districts as part of the LCAP approval process.
- 7) Partner with community-based organizations and advocates to provide training to districts on LCAP-related topics including best practices in meaningful stakeholder engagement, minimum legal requirements and high-leverage strategies to serve high-need students.
- 8) Provide opportunities for school districts to learn best practices from one another in training spaces.
- 9) Post LCAPs for charter schools in your county, which are otherwise not generally available, and invite charter schools to participate in trainings on LCAP development.

For Districts and other Local Educational Agencies:

- 1) Promote partnership with students and parents in site and district-level decisionmaking, including designating staff to engage students and parents at school and district levels and offering high quality training on what meaningful engagement looks like that brings school leaders together with parents and students.¹⁰
- 2) To maximize the LCAP as a comprehensive planning tool, update the LCAP with newly available data, closely tracking implementation and impact of actions and services throughout the year, and sharing this information out to stakeholders and your Board.
- 3) Provide clear guidance and training for school leaders and communities on the proper use of supplemental and concentration funds and high-leverage strategies for serving high-need students.

- 4) To facilitate fiscal transparency, ensure that you are identifying the funding source for budgeted expenditures, including distinguishing LCFF Base and Supplemental and Concentration funds.
- 5) Adopt the best practice of using internal resource codes for supplemental and concentration dollars to be able to provide more accurate accounting of this spending, especially for purposes of the Annual Update and calculation of next year's Minimum Proportionality Percentage.
- 6) To facilitate accessibility, pay greater attention to using plain language over technical jargon and providing a clear definition of terms through a glossary.
- 7) Develop a strong plan for publicizing the LCAP engagement process and encouraging broad participation throughout the year.
- 8) Invest resources in interpretation and translation of materials for non-English-speaking stakeholders to fully participate at engagement meetings.
- 9) Plan in advance for a process that includes stakeholder input to address any additional May Revise funds that the district may learn of close in time to the LCAP public hearing and adoption.
- 10) To promote transparency and accountability, school districts should post any responses, clarifications or revisions made to its adopted LCAP in response to the COE LCAP approval process and must comply with their public hearing and adoption obligations for revised LCAPs.
- 11) Where a school district wishes after adoption of its LCAP to commit to significant current-year spending of LCFF funds (for example, through a bargained salary increase or other major new current-year expenditure commitment), the school district must meet stakeholder consultation and county approval obligations to revise its LCAP through the statutorily-mandated public process.

For Philanthropy:

- Invest in capacity building of grassroots organizations that are committed to bringing student, parent and caregiver voice to the table. These voices are critical to ensuring the promise of LCFF is fulfilled. We have seen that the involvement of community-based organizations in partnership with school districts makes a huge difference to the quality of community engagement, district and school-site planning that is integral to improving student achievement.



For Students, Families and Community Stakeholders:

- 1) Get engaged; learn more about the new funding law and your district or charter school's LCAP.¹¹
- 2) Join your school site council and/or attend districtwide engagements on LCAP and budget development, or request LCAP engagement meetings in your community.
- 3) Connect to community-based organizations in your area that are supporting capacity of students, parents and community to participate in the LCAP process.
- 4) Learn how to follow the money for high-need students. Ask these five questions about how your school district is spending supplemental and concentration funds: http://bit.ly/5_Questions_on_SC_Funds.



IV. ANALYSIS OF LCAP CHALLENGES & OPPORTUNITIES

A. Districts Are Not Providing the Level of Transparency Promised in Exchange for Increased Spending Flexibility.

The “LCAP is intended to be a comprehensive planning tool,” as the introduction to the revised LCAP template states.¹² Yet we have found that many districts are missing the opportunity to engage with their LCAP as a comprehensive planning document, one that contains the breadth of information necessary to guide districtwide strategic planning and continuous improvement. Instead, many districts treat the LCAP as a mere compliance document on the periphery of their education planning that addresses just a fraction of their programs and spending — sometimes just supplemental and concentration funds. Many districts choose not to describe how they are using almost all LCFF funds or provide very vague descriptions of actions and expenditures. Yet such approaches betray a bargain central to the new funding law — that in exchange for increased spending flexibility, including the elimination of more than one hundred restricted funding streams, LEAs would provide increased fiscal

transparency, engagement and accountability with respect to their spending.

The LCAP cannot be a useful comprehensive planning tool — nor can stakeholder engagement be meaningful — if a majority of a district’s education program is not even disclosed. Moreover, this lack of transparency around what districts are doing for all students makes it impossible to tell whether school districts are fulfilling their obligation to proportionally increase or improve services for high-need students as compared to all students, as the law requires.

The law is clear that a district must list *all actions* to meet its LCAP goals for *all* students in each of the eight state priorities.¹³ As the State Board has explained, “[t]he state priorities broadly cover an LEA’s work to support its students and achieve outcomes; therefore, *almost all LEA expenditures* will likely be listed and described [in the LCAP] as a consequence of being tied to the actions that support an LEA’s goals for each of the state priorities.”¹⁴ As the comprehensive educational plan for the district, the LCAP should account for nearly all education-related spending, including all supplemental and concentration — and most base — funding.¹⁵

Yet many of the LCAPs we reviewed only account for a sliver of their total budgets. A number of 2015-16 LCAPs accounted for less than half of the district's general fund spending (the primary operating budget for the district), and in some cases less than 10%. One school district backtracked on its prior year LCAP by affirmatively choosing to only include supplemental and concentration grant funds. And even then, its LCAP only reflected \$31.2 million in supplemental and concentration funds out of \$36.3 million received. Our findings are consistent with the testimony of State Board of Education President Michael Kirst to the Senate Education Committee in which he noted a "great deal of inconsistency around how much of the [LEA's] overall budget is reflected in the LCAP" as well as a "general lack of connection between the information on the LCAP and the [LEA's] underlying budget."¹⁶

School Districts	% General Fund Spending in 2015-16 LCAP ¹⁷
Berkeley Unified	7%
East Side Union High School	8%
West Contra Costa County Unified	10%
Franklin-McKinley Elementary	21%
Antioch Unified	22%
Fresno Unified	84%
Alum Rock Union	85%
Long Beach Unified	86%
Sacramento City Unified	87%
Oakland Unified	88%

For districts that did invest the time and resources into bringing their LCAP to the center of strategic and budgetary planning, we see tangible benefits in terms of transparency and coherence of the plan. Take a look for example at the breadth of actions and services addressed in Oakland Unified's 2015-16 LCAP, which reflects some 88% of the district's general fund spending and nearly 67% of the total district budget.¹⁸ To help summarize the actions funded by supplemental and concentration dollars, the district also included an appendix spreadsheet of just those particular actions across its goals.¹⁹ The district further provided a comprehensive spreadsheet of all the

"There's a great deal of inconsistency around how much of the [LEA's] overall budget is reflected in the LCAP"

SBE President Michael Kirst to the Senate Education Committee, Feb. 2016.

actions and spending in its LCAP that one could sort by goal or funding source, and that clearly referenced back to actions in the LCAP.²⁰ Making such a document part of the appendix would be a best practice.

While we sympathize that document length and accessibility of the LCAP, especially for students and parents, are issues that must be addressed, full transparency and accountability should not be the tradeoff for accessibility.²¹ Indeed when we met with parents, students and community members to review district LCAPs and showed them pie charts in districts where considerable spending was not in the LCAPs, one of the first questions was inevitably: What is the district doing with the rest of the money?

➤ **Recommendation:** The State Board should advise COEs that LCAPs are not acceptable unless they reflect nearly all education program spending in relation to the eight state priorities, including almost all LCFF funds. As an initial interim measure, COEs should have express authority to disapprove LCAPs that reflect less than 50% of LCFF funds.

Readability can be solved with executive summaries, tables of contents, better technical and graphic LCAP design, electronic templates, and progressive layers of links to more detail for the more interested and engaged reader. Accessibility can also be improved with increased use of definitions of terms and greater attention to using plain language over technical jargon.

For example, including the Annual Update, the current template is essentially four year-long plans presented one after the other.

➤ **Recommendation:** Length could be reduced significantly — as would coherence of the planning — if the Annual Update section (i.e., whether you did what you said you were going to do this year)



were integrated into the same section as the LCAP plan for Year 1. Likewise, the reporting for Years 2 and 3 could be integrated on the same page (similar to the multiple columns of the Annual Update). Eventually, an online LCAP with expandable weblinks should ideally allow a reader to see an action's development across all four years, from the Annual Update through Year 3 without the visual overwhelm of a hard copy document.

Interactive hyperlinks could yet further promote full transparency and avoid the urge to oversimplify information. West Contra Costa County Unified has designed an online "interactive" LCAP dashboard that provides one example.²² Likewise a true "electronic" template that allows for interactivity as a member of the public would be a welcome and necessary change.²³ We were encouraged to see the State Board of Education recently issue a challenge to the tech industry to harness the power of technology to solve these accessibility and transparency issues.

We also look forward to the development of improved budgeting systems and tools to help districts better link their pre-LCFF accounting systems to the goals and strategies in the post-LCAP world. The state and COEs should provide support to LEAs to help identify the most effective systems for integrating LCAP strategic planning to LEA budgets.

While we support improvements to the design of the LCAP, we caution strongly against moving away from requiring school districts to provide full transparency around their educational program and spending. To do so would controvert the very intention of the new law by elevating simplification and

flexibility over the transparency and accountability central to LCFF.

"Equal treatment for children in unequal situations is not justice." Gov. Jerry Brown

B. Many Districts and LEAs Are Not Yet Fulfilling the Equity Promise of LCFF.

One of the primary purposes behind LCFF's passage was to make school funding more equitable by providing greater resources to students who for too long have been underserved in our schools. Key to fulfilling this purpose are LCFF's rules around the proper use of supplemental and concentration funds to increase and improve services for high-need students. This new concept, known as "proportionality" strikes a balance between overly prescriptive spending rules under the categorical of the past and the total local discretion in spending some argued for as LCFF took shape. Proportionality establishes a new third way for LEAs to flexibly use weighted student dollars but requires that they actually increase or improve services for high-need students by defined increments — rather than just pay lip service to that key obligation.

Across the state, LEAs struggled especially with the reporting and justification requirements for these supplemental and concentration funds in Section 3 of the LCAP. Indeed LEA confusion regarding how to explain spending of supplemental and concentration funds in their LCAPs was such a widespread concern that the Sacramento County Office of Education invited Public Advocates to collaborate to train districts in their county on how to approach this section to meet the requirements of the law while upholding principles of equity and transparency. In January, we reprised this presentation for more than 40 COEs because of the near universal agreement that this was an area where districts really need more guidance and practice.²⁴

➤ **Recommendation:** SBE should issue guidance clarifying section 3A and 3B requirements in the

form of model sections, hypothetical examples, and clear instructions for reviewing and approving Section 3 of the LCAP, which plays a critical role in ensuring that LEA's minimum obligation to grow services for high-need students is met.

1. Districts are not properly justifying their use of supplemental and concentration funds as *principally directed* and *effective* to serve the high-need students who generate those dollars.

Our greatest concern in reviewing LCAPs was the near universal failure to clearly identify and justify the use of the supplemental and concentration funds generated by high-need students as required by the law. This lack of transparency threatens to undermine the equity promise at the very heart of the new funding formula.

In November 2014, after significant community input, the State Board adopted permanent LCFF regulations to guide the spending of these targeted funds. At the urging of the LCFF Equity Coalition, among others, the Board adopted language that requires districts to describe how districtwide and schoolwide spending of these funds is "principally directed" to the districts goals for high-need students and will be "effective" towards those goals.

The addition of the word "principally" to the permanent regulations resulted from a concerted effort to focus the use of these funds primarily on the goals for high-need students who generate them — that means as *a forethought*, not an afterthought or an equal thought to all other students.

Yet our review of the portions of district LCAPs where justifications for the use of millions of these supplemental dollars were supposed to appear revealed that most districts struggled to understand the new regulatory standard.

Perhaps one reason for this confusion is that the LCAP template instructions themselves are not very clear:

Describe how the LEA is expending these funds in the LCAP year. Include a description of, and justification for, the use of any funds in a districtwide, schoolwide, countywide, or charter-

wide manner as specified in 5 CCR 15496.²⁵

"[A]s specified in 5 CCR 15496" the instructions state, referencing the regulation that contains the critical language for such a justification but leaving it to districts to look up the law and figure out how to apply it. Moreover, we believe many districts have simply copied the LCAP justification format they used in the initial 2014-15 year when emergency LCFF expenditure regulations were in place. Those regulations were more vague as to what justification was needed for supplemental and concentration spending, requiring simply that LEAs demonstrate how the funded services "are directed towards meeting the district's goals for" high-need students rather than the more refined requirement in the permanent regulations, which call for how the funds are *principally directed* and *effective* in addressing those goals.

➤ **Recommendation:** The template should be revised to leave out the guesswork for LEAs and make clear that all districtwide and schoolwide uses of supplemental and concentration funds must explain for each use of funds:

1. How those funded actions are *principally directed* to meet the district's goals for high need students, and
2. How those funded actions are *effective* to meet those goals.

In many instances, Section 3A was such a high-level summary that it was hard to tell what strategies districts were supporting with supplemental and concentration funds. We reviewed LCAPs that merely recapped their broad goals for all students in Section 3A without any meaningful identification of specific actions and a corresponding justification. Some districts took a blanket approach to justifications with an across-the-board claim that because most of their low-achieving students or most of their students were high-need students, any districtwide action was primarily serving their needs.

As a result, districts with higher concentrations appeared to approach this section as though *any* type of program rendered it *principally directed* to targeted groups regardless of whether the service being offered

was part of its core educational program for all students.²⁶ In many cases, the goal for high-need students appeared to be an afterthought, rather than a forethought, in supplemental and concentration spending. For example, one section 3A included “\$11.4 million to improve student achievement for all students and accelerate student learning increases for ELL and low income students” and “\$1 million to provide basic services to all students, including facilities, access to materials and technology.”

Districtwide actions were not clear as to how they were “principally directed” to goals for high-need students. In the absence of robust justifications, we saw numerous instances of districtwide spending of supplemental and concentration dollars that raised questions that went unanswered while the LCAPs were approved. By way of just one example, one LCAP — which passed the county approval process — discusses some \$85 million of districtwide and schoolwide supplemental and concentration spending on a single page. It is only able to do so because it refers very generally to spending actions — like “college and career readiness efforts,” “technology infrastructure and support,” “foster youth services” — without ever explaining exactly what that spending is, how much it is or why it is principally and effectively directed to serve high-need students as the law requires. Another district discusses in one line item in Section 2, \$3.4 million for “psychologists, [School Resource Officers], Campus Safety Officers, Safe, Supporting Schools Program” without distinguishing among these varied strategies or explaining in Section 3 how these actions are principally directed and effective.

Other examples of questionable spending that did not appear designed with high-need students as a forethought include \$6 million on facilities improvement, \$415,000 for Maintenance, Operations and Transportation, \$1.2 million for professional development and curriculum aligned to common core to “ensure all students, including [high-need students] achieve at a high level,” \$7 million in K-3 class-size reduction to meet LCFF 24:1 teacher-to-student goal, \$1.3 million for technology upgrades, nearly \$12 million in support for students with disabilities’ Individual Education Plans,²⁷ \$9 million for teacher pension benefits, \$3.6 million for school security officers that had been paid in prior years from base funds, and \$4.6 million for districtwide class size



reduction in a district that is 54% high-need students, without explanation of how it is principally directed toward the needs of high-need students.

Districts largely failed to address “effectiveness” of districtwide or schoolwide supplemental and concentration spending. While the principally directed justifications were less than robust, most districts did seem to grasp that supplemental and concentration funds must be linked to the needs of targeted students. In contrast, any explanation of “effectiveness” of the proposed spending — as the law also requires — was severely lacking across the LCAPs we reviewed. We saw millions of dollars in supplemental and concentration spending across a range of actions from teacher recruitment and retention to Common Core implementation to private security services, without any explanation of how the district planned to assess whether these strategies are effective. Indeed, we are still searching for examples of robust explanations of “effectiveness.”

Without a focus on effectiveness — and how it will be measured — stakeholders will have limited ability to assess the impact of district services, especially when districts report back on their implementation in the Annual Update. Districts should link their funded actions and services — especially those districtwide and schoolwide uses of precious supplemental and concentration dollars — to annual measurable outcomes of effectiveness so that an honest evaluation can be made of their impact and whether resources should continue to be devoted to these actions.²⁸

Non-concentrated districts generally fail to explain how proposed districtwide uses of supplemental and concentration funds are the most

effective for serving high-need students. In addition, not enough attention is being paid to the distinct requirement for districts and schools with lower concentrations of high-need students to further justify supplemental spending as the “most effective use” in meeting its goals for high-need students. We recently completed a review of 15 of these “non-concentrated” districts and were alarmed to discover that the vast majority in our sample (9) fail to articulate *any* determination regarding the effectiveness of the proposed action or service — let alone why that action is “most effective.” Of those that provided some explanation of effectiveness, most did not explain how the service was “most effective” for high-need student goals. As a result, these districts also fail to articulate the basis in research, theory or experience for their determination that a districtwide use of funds — as opposed to a more targeted approach — is most effective or the alternatives considered, as required by LCFF regulations.²⁹ This raises a genuine concern that funds intended to benefit high-need students and close achievement gaps are being diluted through dispersion across districts and to schools that are serving very few such students.³⁰

Our analysis of dozens of LCAPs at Public Advocates mirrors that of others including the ACLU, the Legislative Analyst’s Office and Californians Together in revealing these significant shortcomings regarding the explanation of districtwide and schoolwide supplemental and concentration spending.³¹ No matter how much an LCAP template might be improved upon, design improvements are no substitute for clear guidance to LEAs and COEs that bring to life the equitable spending plans LCFF promised. Our recent collaboration with the Sacramento County Office of Education and discussion with other county offices that are working diligently to develop sample Section 3s and provide more hands-on support to districts, gives us some reason to hope that next year’s plans will be better. But based on last year’s LCAPs, we still have a long way to go to provide the level of transparency necessary to understand how precious funds generated by high-need students are being spent for their benefit.

➤ **Best Practice:** A best practice that we observed in some LCAPs was the use of a table or spreadsheet to list each action in a way that made it easy to

reference where the schoolwide/districtwide action appeared in section 2 and then separately justify each expenditure.³²

- **Recommendation:** In an electronic format, automatically populate each districtwide/schoolwide expenditure from Section 2 into Section 3A to facilitate clear explanation of each of these actions.
- **Recommendation:** The state should consider authorizing COEs to disapprove a portion of the LCAP and the corresponding LEA budget inasmuch as the current “all or nothing” approval option has made COEs reluctant to fully enforce LCFF spending requirements. With “line-item” disapproval authority, COEs could more effectively correct significant LCAP shortcomings that nonetheless do not warrant wholesale rejection of a district’s budget and spending plan.

2. Many districts fail to clearly explain how they are meeting their obligation to increase and improve services for high-need students as compared to all students in proportion to the additional funds these students generate.

Many districts fail to clearly explain how they are meeting their obligation to increase and improve services for high-need students as compared to all students in proportion to the additional funds these students generate. This urgent concern with LCAP implementation goes to the heart of whether districts are meeting the equity promise of the new funding law. The new formula ensures more resources for traditionally underserved students by imposing what is called the “minimum proportionality obligation.” To meet this obligation, districts must “increase or improve services” for high-need students “as compared to” the services provided to all students in proportion to the additional supplemental and concentration funds high-need students generate for the district. To increase or improve services means to “grow” services in either “quantity” or “quality.”³³

As part of the LCAP process, districts must calculate what’s called the “minimum proportionality percentage.” This percentage derives from the ratio of the supplemental and concentration dollars a district receives for each high-need student served versus the

base dollars generated by all students.³⁴ Districts must state that percentage and explain how it is growing services for high-need students as compared to all students by that amount in Section 3B of the LCAP.

- **Best Practice:** For full fiscal transparency, one best practice is for LEAs to include their 7-step Minimum Proportionality Percentage calculation in an appendix to the LCAP. The calculation contains critical information on what the LEA reports spending for high-need students in the prior year, how the LEA determined the amount of supplemental and concentration spending it will receive in the LCAP year, and how much additional effort it must make for high need students over and above the amount of effort it expends on its base program.

From the explanations provided in nearly all LCAPs we reviewed, we could not tell whether districts are truly meeting their proportionality obligation to high-need students. Our findings are consistent with testimony from State Board of Education President Michael Kirst, who told the Senate Education Committee that “Section 3 of the LCAP rarely provides clear and specific information of how services are being increased or improved for low-income students.”³⁵

These are just some examples of the challenges we encountered in analyzing whether districts were genuinely growing services for high-need students:³⁶

- In many cases districts fail to reference actions with enough specificity to locate them in Section 2 of the LCAP. One district listed several actions, such as a newcomers program and a support team for foster youth, as targeted increased services for high-need students, but then these actions did not appear in Section 2 of the LCAP.
- In some cases, the actions listed did not appear to fund any type of service for students, let alone increased or improved services for high-need students, as in the case of \$9 million in supplemental and concentration funds to pay for higher cost teacher pension benefits.
- Some districts failed to explain in Section 3B how services in the LCAP that were clearly being provided to “all students” represent growth for



high-need students “as compared to” services provided to all students. For example, one LCAP allocates “\$1 million to provide basic services to all students, including facilities, access to materials and technology;” another uses these funds for basic operating expenses, including \$396,000 to “Restore routine maintenance to improve cleanliness and maintenance of our schools,” \$81,000 for “Administrative Support,” and \$152,000 for “Clerical Support.”

- In most cases, districts do not clarify when a service is new for high-need students, as opposed to the same level of service provided in previous years. The lack of detail in prior year LCAPs makes it nearly impossible to tell whether a service is growing year to year or in comparison to what is provided to all students (that is, whether it is supported by prior year expenditures captured in 5 C.C.R. § 15946(a)(2) or by new LCAP year growth in supplemental and concentration funds captured in 5 C.C.R. § 15946(a)(4)). We are especially concerned that districts may be paying for services previously funded from base dollars out of supplemental and concentration dollars. For example, one district described a \$3.6 million expenditure for school security officers as an “improved” service for high-need students although those positions appear to have been funded in the prior year with other general fund dollars.
- **Recommendation:** LEAs should be required in Section 2 to clearly indicate where an action is new and/or improved or merely continuing from prior years.³⁷

- Districts that did not have a robust process for inclusion of significant May Revise supplemental and concentration dollars in their LCAPs fail to demonstrate how they are meeting their proportionality obligation — for example, one such district held more than \$4 million out of \$36 million in supplemental and concentration funds in its general fund reserve without reporting that funding or related proposed actions related in its LCAP.
 - For districts that have limited their description of actions and services in Section 2 just to services funded by supplemental and concentration dollars, there is no basis for comparison to understand what the district is doing for high-need students as compared to all students.
 - In many cases, districts fail to provide the monetary investment associated with actions and services that would enable a reader to assess whether the district is meeting its obligation to increase or improve services quantitatively even though the district is relying on a quantitative method for meeting its proportionality obligation.
- **Best Practice:** The San Mateo COE has prepared a sample Section 2 of the LCAP for its districts that first describes under each goal actions that comprise the “base program” for all students and then separately discusses increased and improved services targeted to high-need students. First describing the core program being provided to all students provides useful context for understanding how in comparison the district is growing services for high-need students.

Given the confusion around what constitutes a meaningful explanation of increasing and improving services, we encourage the State Board to develop strong exemplars for this section that illustrate how an LEA might meet its minimum obligation quantitatively or qualitatively.³⁸ Failing to act to clarify this critical requirement endangers the equity promise at the heart of the new funding law.

3. Some districts appear to significantly underspend supplemental and concentration dollars in the LCAP year compared to promised spending without explanation and appear to fail to carry over that obligation to subsequent years.

Some districts do not appear to be spending significant portions of the supplemental and concentration funding they reported receiving in their prior year LCAP. We observed significant deviations in planned versus estimated actual spending in reviewing the Annual Updates and Minimum Proportionality Percentage calculations. Combined with a failure to explain where those missing dollars for high-need students were actually invested, we are concerned that students who most need support are losing out on critical new or improved services. This loss will snowball over the years as the lower supplemental and concentration spending will deflate the district’s calculation of those funds in future years until we reach full implementation.

Across the board we saw some troubling underspending or underreporting of supplemental and concentration spending. For example, we saw LCAPs where supplemental and concentration expenditures overall fell short by \$1.2 million out of \$37.5 million, or for specific actions by \$4.4 million out of \$4.5 million, and \$1.6 million out of \$1.9 million, without explanation of the change in spending and the differences in planned versus implemented actions.

In one extreme example, a district’s proportionality calculation only showed some \$13 million in estimated prior year spending out of more than \$27 million in supplemental and concentration funds that the district received from the state. This indicated a \$14 million shortfall in 2014-15 spending for high-need students. In addition, because a key factor in how much supplemental and concentration funds a district must spend in the coming LCAP year is how much the district spent in the prior year, the district’s lower spending resulted in some \$7 million less in projected total supplemental and concentration spending for 2015-16 than our estimate had the district met its 2014-15 obligation.

When pressed to explain the discrepancy, the district responded that to meet their proportionality obligation did not require accounting for all their

supplemental and concentration spending. Even more troubling, the district believed that it had no obligation to meet its minimum proportionality obligation in the fiscal year until LCFF is fully implemented. This understanding contradicts the precise language of the regulations, which clearly state that “an LEA shall determine the percentage by which services for [high-need students] *must be increased or improved above services provided to all pupils in the fiscal year*”³⁹

While we understand there may be good reason that a district was unable to spend as planned, or may choose to change course in spending supplemental and concentration dollars, Annual Updates rarely acknowledged or provided explanation for significant underspending. The Annual Update is precisely the space where the district should provide explanations of deviations in spending, as discussed further below.

Where a district has failed to spend the supplemental and concentration dollars it received, it raises serious questions about whether the district has met its mandatory obligation to proportionally increase and improve services for high-need students in that fiscal year, as the law requires.⁴⁰ It also begs the question as to whether the district spent dollars targeted for high-need students without regard for those parameters. Districts that fail to meet their minimum proportionality obligation either quantitatively or qualitatively have an ongoing obligation that does not disappear.

- **Recommendation:** Those districts should be required to clearly report their unspent supplemental and concentration funds and carry forward the unspent money and/or its corresponding qualitative effort into the following fiscal year to make up for the services high-need students were entitled to receive. Otherwise, the districts fail to meet their proportionality obligation.
- **Recommendation:** COEs must take a more proactive role in monitoring the implementation of LCAPs and whether districts are truly meeting their state proportionality obligation to increase and improve services for high-need students.



Likewise, we saw that many districts struggled to report their supplemental and concentration spending in the Annual Update because they lacked an accurate system for tracking those dollars. In the absence of accounting codes for supplemental and concentration dollars, which is not required by the current law, many districts opted not to track those dollars. As a result, they were at a loss for how the money was spent when required to account for it in the spring.

- **Recommendation:** The state and COE should encourage districts to institute internal resource codes for their supplemental and concentration dollars for this purpose. We have seen that in the past year, many districts have made that move on their own, and we expect more accurate reporting in the upcoming round of Annual Updates.
- **Recommendation:** A revised LCAP template should have a box in the Annual Update or Section 3 for districts to note how much of their unmet obligation to increase or improve services from the expiring LCAP year they will need to spend in the next LCAP year to fulfill their minimum obligation to high-need students.

4. LCAPs generally fail to capture how supplemental and concentration dollars are being spent at school sites.

We generally support and encourage a district strategy of sending more funds to school sites for local school communities to prioritize needs and spending. We are concerned, however, that we saw few

examples of school districts that transparently explained in their LCAPs how school districts plan to spend supplemental and concentration funds in ways that are principally directed toward and effective in meeting the goals for high-need students.

In a review of six urban school district LCAPs, all sent significant sums of supplemental and concentration funds to school sites (ranging from \$1.8 million to \$18.5 million) but did not describe with any specificity how the money would be spent. Often, large value line items are described generically as “supplemental supports” to high-need student groups without further explanation about what supports and what schools. We saw this same problem in the Annual Update.

Most districts explained that funds were distributed according to the concentration of high-need students, and several provided appendices with the amount of funding, although not the specific actions funded. In one instance, the LCAP referenced the school site plans as containing further information. In the absence of more, we are concerned that these funds are being passed down to school sites without adequate guidance on how they should be spent in service of high-need students. This concern appears to be founded based on feedback from stakeholders on school site councils and school leaders who are often unfamiliar with the district LCAP and requirements around supplemental and concentration spending and their ability to weigh in on the school site use of these funds.

➤ **Recommendation:** The State Board should share best practices for supporting school site governance and shared decisionmaking and develop models for reporting in the LCAP and Annual Update on site-level spending. COEs should more closely scrutinize vague descriptions of school site spending to push for greater clarity in how these funds are being spent both in the forward-looking LCAP and the Annual Update. In addition, districts should provide clear guidance and training for school leaders and communities on the proper use of supplemental and concentration funds and high-leverage strategies for serving high-need students.

5. Charter schools appear to be spending supplemental and/or concentration funds without any oversight whatsoever.

While Public Advocates has not conducted an exhaustive review of charter school LCAPs, a preliminary look at several charter plans that were available online gives reason for concern and points to the need for closer scrutiny and support for the charter sector with respect to LCFF monitoring.⁴¹

From conversations with charter school operators, authorizers and COEs, we observed a gaping hole when it comes to charter school compliance with the new funding law. No official entity at the state or local level is responsible for reviewing and approving charter school LCAPs other than the charter school’s own board. While charter schools must develop and approve local plans, once the charter school board adopts the plan — which does not have to take place in a public hearing — the plan is merely submitted to the charter authorizer and county office of education. Unlike school districts, COEs do not review or approve charter school LCAPs. Neither do charter school authorizers, except as pertains to the LCAP measurable pupil outcomes, which must be incorporated into the charter petition upon renewal or submission of a new charter. Even with respect to measurable pupil outcomes, the only check comes several years down the road in that authorizers must provide technical assistance when a charter fails to improve measurable outcomes for three student subgroups or more in three out of four LCAP years.

Yet charter schools, like school districts, receive supplemental and concentration funds and are subject to the same equitable spending regulations. In section 3 of the LCAP template, charter schools must explain how each schoolwide expenditure of these funds is *principally directed* and *effective* towards the charter school’s goals for high-need students. Likewise, the charter school must calculate and explain its obligation to increase and improve services for high-need students in proportion to the supplemental and concentration dollars it receives.⁴²

A preliminary review of Section 3 for many charter schools raised serious concerns that the sector lacks basic understanding about their obligations and could use more support on how to complete not just Section 3 but the entire LCAP template.⁴³ In general,



most of the charter schools we reviewed failed to identify and explain spending of supplemental and concentration funds according to the regulatory standard. Likewise, the LCAPs we reviewed lacked a clear explanation of how the charter school was increasing and improving services for high-need students as compared to all students. In one glaring instance, a charter school left Section 3 of the LCAP entirely blank.

- **Recommendation:** The state should revisit the current architecture for oversight of charter school LCAPs to fill in the blanks on how charter schools will receive the necessary support to develop LCAPs and how the state will ensure that the significant supplemental and concentration funds being sent to charter schools are being properly spent in service of high-need students.

C. Districts Varied as to Whether They Adopted Robust Annual Measurable Outcomes, and Some Omitted Legally Required Metrics to Show How They Are Performing in the Eight State Priorities.

We observed broad variation in LCAPs as to whether all required metrics were included, as well as the robustness of expected annual measurable outcomes. In the LCAP, districts must adopt goals related to the eight state priorities, and annual measurable outcomes to indicate progress towards those goals for all students and for each student subgroup. Districts are responsible for reporting on 20+ state-required metrics and are encouraged to set local metrics for local priorities as well as state priorities that lack mandated measurements like

“parent involvement.” We all know that what gets measured matters in terms of how resource and investment decisions are made, so it is critical for continuous improvement that every district sets meaningful and transparent measurable outcomes across the range of state and local priority areas in the LCAP.

While most districts are tracking all required metrics, we did observe some notable exceptions. For example, one high school district failed to include graduation rates and completion of required courses for college eligibility (known as “A-G courses”). We found that in year two, COEs appeared to be on top of correcting such obvious deficiencies.

*One notable area where districts seemed especially at a loss was **identifying meaningful local measures of “parental involvement.”*** Parental involvement includes “efforts the school district makes to seek parent input in making decisions for the school district and each individual schoolsite” and “how the school district will promote parental participation in programs for [high-need students] and individuals with exceptional needs.”⁴⁴ Where districts included measures of parental involvement, very few focused on these specific aspects of engagement: (1) input on decisionmaking, and (2) participation in programs for high-needs students and students with exceptional needs. For example, one district focused on increasing school participation rates in a parent survey, but had no measurement focused on the quality of responses to the survey. Another discusses a 10% increase in parent engagement opportunities across the district, without explaining what these are and how it will be measured. A third talks about increasing parent School Culture and Climate Survey results by 1%. While we encourage the use of parent surveys, this measurement is vague and unclear as to what survey results, as well as modest in terms of progress.

- **Recommendation:** The state should issue guidance on substantive measures of parent engagement that demonstrate efforts at shared decisionmaking and engaging parents in programs for high-need students as the Parental Involvement state priority requires.⁴⁵

*Another common problem we have seen is districts **omitting baseline data and/or a clear target***

for expected annual measurable outcomes. Absent baseline and target data, it is impossible to assess the robustness of the measure itself and ultimately the effectiveness of the LEA's LCAP actions. For example, one district sets outcomes such as "Increase the number of ELs achieving proficiency in English" and "Improve attendance rate" without providing baseline data for how students did in the prior year or a target for how much progress the district expects to make in the next year.

We saw districts propose heavy investments without setting corresponding annual measurable outcomes to track the strategy's effectiveness. For example, one district allocates significant resources, especially supplemental and concentration funds to teacher recruitment and retention with a focus on recruitment of a diverse teaching force, but lacks any corresponding measures in its LCAP as to how it will measure the effectiveness of these funds. As noted above in our concerns regarding equitable spending, this is particularly concerning where a district is spending supplemental and concentration funds districtwide or schoolwide as it hinders the public's ability to weigh in on the district's chosen strategies and ultimately may render the investment invalid if its effectiveness cannot be established over time.

We were pleasantly surprised to see some districts embracing innovative local measures in areas where the state has not mandated metrics. For example, Fresno Unified has a range of creative measures of early grade college and career readiness, including the percentage of 3rd graders who have a career experience at a school site, as well as the number of 4th graders who visit a local business, 6th graders who visit a community college, and 8th graders who visit a California State University campus. And Sacramento City Unified incorporates qualitative school climate data from the California Healthy Kids Survey with a focus on improving responses in areas of school environment, school connectedness, school safety, and peer relationships.

Some districts omit disaggregated data and measurable outcomes specific to student subgroups. As a result, the LCAP fails to capture opportunity and achievement gaps, especially for high-need students who should be at the heart of the district plan. One district that has a strong focus on disaggregated data is Oakland Unified. For example, in addition to setting a

target chronic absence rate for all students, OUSD has set specific targets for improving chronic absence rate for African-American, Native American, Pacific Islander and Foster Youth students who have higher rates of chronic absenteeism than the general student population.⁴⁶

In an era of uncertainty regarding the state's new accountability system and how districts and schools will be held responsible for performance, we also observed that districts were reluctant to set ambitious targets out of a concern that failure to meet those targets would lead to a loss of funding or autonomy. Thus, progress on a given measure for all students or student subgroups were often pegged at increments of 1% or less.

Absent clear, specific information about district performance across the eight state priority areas and corresponding meaningful targets for annual progress, stakeholders will struggle to assess whether district and school strategies are driving significant continuous improvement or should be revised. We are hopeful that the upcoming State Board of Education adoption of LCFF Evaluation Rubrics with "ambitious, yet attainable" performance standards will promote some level of consistency across districts.⁴⁷

➤ **Recommendation:** Even after adoption of the Rubrics by the State Board, districts will need guidance on setting clear, ambitious and attainable measurable outcomes to drive improvement across all priorities, including parental involvement, school climate and student engagement.

D. Most Annual Updates We Reviewed Lacked the Transparency Necessary to Serve as a Robust Tool for Reflection and Continuous Improvement.

The Annual Update of the LCAP can fulfill its role as a key tool for community accountability and continuous improvement only if districts transparently disclose implementation of planned actions, accurate spending of resources and the actual estimated outcomes. Most importantly, districts must candidly reflect on their progress or lack of progress to inform the following year's approach. As the first year that districts had to do an Annual Update, and possibly the first time that many districts had to report in a

comprehensive way on the impact of their strategies and the actual spending as compared to their budgets, the results for 2014-15 were mixed.

We found **inconsistency in the quality of explanations and reflections in the Annual Update**. As mentioned above, in some cases, district estimated actual spending in the Annual Update deviated significantly from planned spending for 2014-15. Often, districts failed to explain these discrepancies.⁴⁸ As discussed above in Section IV.B.3, where underspending of supplemental and concentration funds is significant, this raises serious concerns about whether the district met its minimum proportionality obligation to high-need students for the fiscal year.

- **Recommendation:** COEs should provide stronger support and monitoring of LCAP implementation to ensure that districts are leveraging their LCAP as a tool for continuous improvement, sharing data with staff, partners and stakeholders early on and seeking to implement the actions as planned. In addition, COEs should pay closer attention to the quality of reporting and explanation in the Annual Updates, especially regarding significant deviations in planned actions or spending.⁴⁹

Districts were challenged by the kind of accounting both for funds but also for implementation of actions that the Annual Update requires. For example, one district acknowledged its difficulty in reporting on implementation of an action to hire a set number of positions, stating “[w]ithout a proper tracking system in place for 2014-15, we were not able to identify the positions specifically reference[d] in the LCAP.” After having been through one round of the Annual Update, our expectation is that districts will implement their LCAPs with better systems in place to track what actually happened and what resources were spent.

- **Best Practice:** If the LCAP is truly to serve as a comprehensive planning tool, the district should be closely tracking implementation and impact of actions and services throughout the year and sharing this information out to stakeholders and staff on a regular basis.

For the most part, district reflection was limited. Districts reported that they would stay the course and continue the same strategies, concluding that it is too soon to tell whether interventions are working. The districts that did reflect candidly on preliminary results stood out to us from the crowd. It was refreshing to see one district, for example, state plainly that reading proficiency scores were “unacceptable” and then discuss the investments to be made to change that outcome.

Overall, it was challenging to see the through lines from the actions described in the Annual Update to what actions were included in the 2015-16 plan.

- **Recommendation:** It would be helpful for districts to cross reference actions in the upcoming LCAP year so that one could tell how actions in the prior year plan were continuing, evolving or being discontinued. Annual Updates did not provide the level of detail to be able to understand this change over time. An electronic template would be well suited to this function. Alternatively, length of a hard copy LCAP could be further reduced significantly if the Annual Update section were integrated into the same section as the district’s plan for the coming LCAP year. This would also promote better understanding of how a school district’s strategies and actions are developing over time.

For many measurements, at the time the Annual Update was drafted, districts lacked even one current year of data as to the impact of actions and services. One of the common challenges districts faced is that much of the data for measurable outcomes is a year behind (e.g., cohort graduation rates and student test scores). It will take time to see whether the strategies in the LCAP are working to improve outcomes for students.

- **Recommendation:** We recommend that districts refresh their Annual Updates in the fall with newly available data to share the most accurate information on the impact of their strategies and update their targeted outcomes for the current-year LCAP.

E. Too Many Districts Approach LCAP Community Engagement as a Checkbox, Instead of a Meaningful Exercise in Shared Decisionmaking. But Districts That Invested Resources and Partnered with Community-Based Organizations, Are Sowing Seeds of Real Cultural Transformation.



“We have to engage more parents so that our schools can thrive.”

Eleazar Cuenca, Parent Leader with Bay Area PLAN

A major promise of LCFF is the dawn of a new era of partnership among district- and school-level decisionmakers with community stakeholders, especially students, parents and educators. Unfortunately, whether due to lack of capacity, know-how or an unwillingness to break with traditional top-down structures, many districts and schools are missing the opportunity to shift boldly to a culture that authentically values student and parent voice. Too often districts and school sites continue to approach such engagement with a compliance mentality. Parent speaker after speaker at the March 2016 State Board of Education meeting reinforced their frustration with local efforts to engage parents in LCAP development that treated such engagement as little more than a checkbox.

While districts have appeared to increase stakeholder outreach efforts as a result of LCFF and generally did well to summarize those LCAP

development efforts in Section 1, feedback from parents and students participating in the LCAP review days we hosted with Californians for Justice revealed that districts need support to diversify their outreach and ensure that engagement is meaningful. Absent eyes and ears on the ground, it can be hard to assess whether the involvement of parents, students and other stakeholders reported in the LCAP development process was truly authentic and impactful. Aside from a handful of actions and services, **parents and students struggled to understand how their input was valued and incorporated into district plans.**

➤ **Recommendation:** To facilitate understanding of how stakeholder input impacted district planning, where the district reports in Section 1 of the LCAP that stakeholder input impacted an action, there should be a reference — or a hyperlink in an electronic format — to locate that action in Section 2 of the LCAP.

In our experience supporting parent and student organizations and participating in school district engagement meetings, we saw how **challenging it was for school district leaders to structure spaces for meaningful feedback.** Comments on post-it notes raised questions that went unanswered. And meetings that were poorly attended nonetheless resulted in official recommendations to the school board. In many instances, the actual draft LCAP and Annual Update was only made available weeks if not days before the final public hearing, which provided minimal time to make meaningful recommendations on actions and spending. Often parents and students were asked to provide input on multiple actions and services that they were only seeing for the first time at a meeting. Many districts made decisions to spend significant sums of money, including supplemental and concentration dollars, that did not appear in their LCAP at all, or that were not presented and discussed with parent and student advisory committees.

➤ **Recommendation:** Districts must promote authentic partnership with students and parents in site and district-level decisionmaking, including designating staff to engage students and parents at school and district levels and offering high quality

training on what meaningful engagement looks like that brings school leaders together with parents and students. The state should provide more guidance in terms of best practices and model engagement timelines that promote strong stakeholder input and engagement.⁵⁰

School districts struggled to provide appropriate **language interpretation and translation** throughout the process. In particular, the production of the LCAPs taxed district capacity and left minimal time for translation of draft documents for non-English speakers. Many school districts still have not translated their final LCAP documents or summaries for significant non-English speaking populations.

- **Recommendation:** The state should also make clear that school districts are obligated to provide translation and interpretation for engagement of non-English speaking parents and caregivers in LCAP development not just in light of the Education Code but also federal civil rights guidance and the requirement for community engagement and consultation.

We also observed multiple school districts where there is **no distinct Parent Advisory Committee** to the LCAP in which parents are a majority, as the LCFF regulations require. While it is fine for school districts to assemble advisory committees with a broader range of stakeholders, the law requires that there be an advisory committee in which parents and/or caregivers have a majority voice.

As a recent report from Families in Schools concluded, while school leaders appreciate the value of parent engagement, “most of them readily admit to not doing it consistently, authentically, and meaningfully.”⁵¹ To flip this storyline, districts and school sites need much greater support to build their capacity to engage families meaningfully in shared decisionmaking and promoting student success.

- **Recommendation:** For “local control” to work, the state must **invest to build capacity of school districts and stakeholders** to make real the promise of local accountability **and meaningful community engagement**. We especially support more resources focused towards community

engagement for LCAP development at both the district and school site.

That means the State will need to improve the quality of the planning, the depth and reach of the engagement, the readability of the LCAP, and the ability of local communities to understand what they find there. We must develop better models to engage students, parents and other stakeholders on the broad range of actions and services in LCAPs and obtain meaningful feedback.

- **Recommendation:** The state — in collaboration with school districts, COEs and stakeholders — must develop a larger bank of exemplary LCAP summaries and other tools to address the readability and accessibility of the LCAP. Revising the LCAP Template and creating a truly electronic and interactive LCAP would go a long way.⁵²

As discussed in Section IV.C above, **few districts provided substantive measures of parental involvement** although it is a required state priority. The state priority on “parental involvement” requires districts to measure the “efforts the school district makes to seek parent input in making decisions for the school district and each individual schoolsite,” and “how the school district will promote parental participation in programs for [high-need] pupils and individuals with exceptional needs.”⁵³ Sheer quantity — whether through the number of meetings, attendance at those meetings or responses to a survey — do not necessarily signify quality engagement regarding decisionmaking input and participation in programs for high-need students.

Community-based organizations have stepped up significantly to support meaningful implementation of LCFF’s community engagement requirements. Their partnership has been critical in supporting turnout of diverse students and parents for districtwide meetings. For example, in East Side Union High School District, youth leadership organization Californians for Justice partnered with the district to organize student LCAP forums. In Oakland Unified School District, grassroots organizations like PICO-affiliate Oakland Community Organizations, Bay Area PLAN and CFJ support parent and student leaders to co-construct meeting agendas with community engagement staff. We have seen that the involvement

of community-based organizations in partnership with school districts makes a huge difference to the quality of stakeholder engagement and district and school-site planning that is integral to improving student achievement.

➤ **Recommendation:** We urge foundations and philanthropy to invest in capacity building of grassroots organizations that are committed to bringing student, parent and caregiver voice to the table. These voices are critical to ensuring the promise of LCFF is fulfilled.

We saw the most promising signs of change in districts that partnered actively with parent and student leadership organizations to turn out diverse parents and students and construct student- and parent-friendly spaces for discussion of LCAP goals, actions and spending. In these districts, community stakeholders and the district invested time in collaborating to improve the LCAP public participation process each year.

As a result, the LCAPs reflected progress from Year 1 to Year 2 in the impact of community voices, although that impact may have been limited to specific priority actions or a subset of funding. For example, in Alum Rock Union School District, parents from Somos Mayfair, a San Jose community organization, were able to persuade the school district to invest over \$1 million in supplemental and concentration dollars to fund a bilingual family liaison at every school site in the district.

In Oakland Unified, members of the Parent Student Advisory Committee had a direct impact in convincing district staff to change course when it came to the proposed spending of more than \$4 million of supplemental and concentration dollars that became available after the Governor's May Revise budget proposal. The parents and students on the committee made a concerted effort to encourage the district to send the bulk of this funding directly to school sites based on the concentration of high-need students for school communities and to have the site-level use of those funds determined through a public shared decisionmaking process. In addition, the committee members supported and won increased staffing to support capacity-building of parents and students for engaging in LCAP and school site planning, as well as

targeted supports for foster youth.⁵⁴

We hope to see in future years increased investment and progress in meaningful engagement of students and parents as part of a year-long and holistic LCAP development process. Through sincere efforts at community engagement, we are beginning to see LCFF's great promise for lasting transformation — a transformation that will not only shift strategies, but alter school culture and eventually drive greater student achievement.



“What gives me hope is that I can really see that the district, and the parents, and the students are really trying for what’s best for our education. Everyone’s giving ideas and building on each other — just collaborating as a community, which is really the point of LCAP.”

Naudika Williams, Student Member of Oakland Unified LCAP Advisory Committee, Californians for Justice leader

V. CONCLUSION

While we have seen growth and progress in the quality of LCAP development over the past two years, many districts are still continuing to approach the exercise of developing their local plans as one of compliance instead of continuous improvement. As a result, district LCAPs are falling short of their promise to bring local transparency and accountability to public education.

More concerning is the very real possibility that students will miss out on the equity promise at the heart of the new funding law because many

LEAs, including districts and charter schools, do not appear to be proportionally increasing or improving services for high-need students or, if they are, not in ways that are transparent, justified and capable of being judged for effectiveness over time.

With that said, we see some sure signs of hope. For those districts making a serious investment in shifting the culture of their schools and district operations to incorporate meaningful community engagement and candid reflection, transformative change may be possible. It will be years until we can truly assess whether the strategies adopted in the last two years will bear fruit, but these green shoots deserve recognition and celebration.

VI. END NOTES

¹ Public Advocates' LCAP summaries for 2015-16 are available at <http://bit.ly/PA2015LCAPSummaries>.

² In this report, the term "high-need students" refers to low-income, English language learner and foster youth students. Under LCFF, these categories of students are called "unduplicated pupils" for whom districts receive additional "supplemental" and/or "concentration" funds. See June 2015 Public Advocates-ACLU Letter to all State and County Superintendents re: Minimum Legal Requirements in LCAPs at <http://bit.ly/1L13RDY>.

³ See LCAP Template, page 1.

⁴ See Public Advocates' joint training materials with Sacramento County Office of Education on Section 3 of the LCAP. For more information on this training and to access the materials, visit Public Advocates' website at http://bit.ly/PA_Sec3_Training and Sacramento County Office of Education website at <https://www.scoe.net/lcap/training/Pages/default.aspx>. See also One-Pager on Section 3 Requirements at http://bit.ly/LCAP3A_3B_1-pager and Public Advocates' Guiding Questions on the Use of Supplemental & Concentration Funds at http://bit.ly/5_Questions_on_SC_Funds.

⁵ This recommendation aligns with that of the Legislative Analyst's Office, "Review of School District's 2014-15 Local Control and Accountability Plans," (Dec. 2015) at p.4, available at <http://bit.ly/22g38Fg> ("LAO Report").

⁶ Oakland Unified School District prepared such a comprehensive spreadsheet for 2015-16 LCAP spending, although it was not an appendix to the LCAP. The spreadsheet is available as Attachment 2 at http://bit.ly/PA_LCAP_KeyFindings.

⁷ It will also help LEAs to better fulfill their statutory obligation to identify and classify expenditures according to the California School Accounting Manual as per Education Code § 52061(b) as well as follow the LCAP Template instructions for "Budgeted Expenditures."

⁸ See Public Advocates and Sacramento County Office of Education joint training materials referenced above, *supra* note 4. This information was presented to more than 40 COEs in January 2016.

⁹ This advice is consistent with CCSA's LCAP Guide that emphasizes COEs' important role in supporting LCAP implementation.

¹⁰ See, e.g., PICO California *et al.*, "Best Practices in LCFF Implementation: Developing a Culture of Authentic Parent Engagement and Shared Decisionmaking," at <http://bit.ly/LCFFparents>.

¹¹ Find background resources on LCFF at www.publicadvocates.org/LCFF and learn "7 Steps to Size Up Your School District's LCAP" at <http://bit.ly/7StepsLCAP>.

¹² LCAP Template, p.1: "Accordingly, in developing goals, specific actions, and expenditures, LEAs should carefully consider how to reflect the services and related expenses for their basic instructional program in relationship to the state priorities."

¹³ See Educ. Code §§ 52060(c)(1) & (2). Section 52064(b)(1) further instructs the State Board to create a mandatory LCAP template that requires a listing of expenditures for all actions implementing the priorities (without limitation as to subgroup of students or type of funds). The LCAP Template, Section 2 Instructions state that the LCAP must include a "description of the annual goals, for all pupils and each subgroup of pupils to be achieved for each of the state priorities." LEAs must further identify "all annual actions to be performed and services provided to meet the described goal" and the "budgeted expenditures" for each action.

¹⁴ See WestEd, Developing a Quality Local Control and Accountability Plan (2014), at p.7, available at <http://lcff.wested.org/wp-content/uploads/2014/03/Developing-a-Quality-Local-Control-and-Accountability-Plan.pdf> (emphasis added).

¹⁵ To emphasize this point, the State Board added further language to the LCAP Template instructions emphasizing the importance of “reflect[ing] the services and related expenses for [the] basic instructional program in relationship to the state priorities” in “developing goals, specific actions, and expenditures.”

¹⁶ Michael Kirst Testimony, Cal. Senate Educ. Committee Info. Hearing, Feb. 24, 2016, archived video at: <http://senate.ca.gov/media-archive#> at 00:24:37.

¹⁷ Rounded to the nearest %.

¹⁸ See Oakland Unified School District Summary of Goals, Actions Areas & Measurable Outcomes, 2015-16 LCAP at <http://bit.ly/1XfvEFV>.

¹⁹ Oakland Unified School District LCAP Summary (June 26, 2015), Attachment 1 at http://bit.ly/PA_LCAP_KeyFindings.

²⁰ Oakland Unified School District LCAP Spending Spreadsheet, Attachment 2 at http://bit.ly/PA_LCAP_KeyFindings.

²¹ See John Affeldt, “In Exchange for Flexibility, Local Plans Will Require Work,” *EdSource* (Nov. 23, 2015) at <http://bit.ly/1PX3dGF>.

²² See West Contra Costa County Unified School District 2015-16 Interactive LCAP at <http://www.wccusd.net/Page/5292>.

²³ We were disappointed to learn at the November State Board meeting that the new “electronic template” was only “electronic” for LEAs filling it in. This will make the process easier for LEAs to complete but does nothing for community readers who will see exactly the same analog pdf document.

²⁴ See *supra* note 4 regarding joint Section 3 training materials with Sacramento County Office of Education.

²⁵ See instructions for Section 3 of the LCAP Template on the “Use of Supplemental and Concentration Grant Funds and Proportionality.”

²⁶ While one could conceive of a regulatory provision that permitted very high-concentration districts (e.g., over 90% high need) the flexibility to increase base programming with supplemental and concentration funds, there is no such law currently in place. Rather, every LEA with 55% or more high need pupils must similarly justify each action supported by supplemental and concentration funds as “principally directed” and “effective” in addressing high need pupil goals, i.e., as more targeted uses for services which are “in addition to” and “as compared to” base-funded services. 5 C.C.R. §§ 15496(a), (a)(2), (a)(7), (b).

²⁷ The LCAP listed nearly \$30 million in combined supplemental and concentration and base spending. The district later clarified that approximately \$12 million of this amount was supplemental and concentration funds, although this is not apparent from the LCAP.

²⁸ We are also concerned that some COEs and districts are approaching the “effective” requirement as a question of efficiency rather than efficacy. As one COE explained to us, in districts with concentrations above 55%, Section 3B need only provide a general summary of services provided, without specific justifications according to the regulations, because delivering that service districtwide would be more “effective” than delivering the services in a targeted manner. This apparent substitution of “efficiency” for a genuine assessment of “effectiveness” is troubling. SBE should make clear to COEs that no LEA is exempt from the requirements of section 15496(b) regardless of its concentration of high-need students.

²⁹ 5 C.C.R. §§ 15496(b)(2)(C) & (b)(4)(C).

³⁰ A study by the Public Policy Institute of California highlighted this concern in examining numerous districts with large differences between the district’s share of high-need students versus individual schools where high-need students may be concentrated in certain sites as opposed to dispersed evenly across a district. See L. Hill & I. Ugo, Public Policy Institute of California, “Implementing California’s School Funding Formula: Will High-Need Students Benefit?” (March 2015) at http://www.pplic.org/main/publication_quick.asp?i=1127.

³¹ See David Sapp, “Making the Local Control Funding Formula Work” (Aug. 2015) at <http://bit.ly/22g35t9>; LAO Report at <http://bit.ly/22g38Fg> (“few districts provide clear or compelling rationales for using their supplemental and concentration funds on a districtwide and schoolwide basis); Elvira Armas *et al.*, “Falling Short on the Promise to English Learners: A Report on Year One LCAPs,” (Apr. 22, 2015) at p.5, available at <http://bit.ly/1PlpuYK>.

³² Some examples of best practices in Section 3As are featured in our joint training with the Sacramento COE at http://bit.ly/PA_Sec3_Training; see *supra* note 4.

³³ 5 CCR §§ 15495(k) & (l).

³⁴ See the seven-step formula at 5 CCR § 15495(a)(1)-(7).

³⁵ Michael Kirst Testimony, Cal. Senate Educ. Committee Info. Hearing (Feb. 24, 2016) archived video at <http://senate.ca.gov/media-archive#> at 00:25:21; see also The Education Trust-West, “Building a More Equitable & Participatory School System in California: The Local Control Funding Formula’s First Year” (Dec. 2014) at p.17, available at <http://bit.ly/1UG8QBC> (“It is not clear how supplemental and concentration grants will ‘increase or improve’ services for high-need students.”).

³⁶ Some of these examples come directly from LCAP Sections 3B; others are based on actions funded with supplemental and concentration dollars that appear in other sections of the LCAP.

³⁷ This recommendation aligns with one in the December 2015 LAO Report, at p.4, available at <http://bit.ly/22g38Fg>.

³⁸ Public Advocates included some positive Section 3B examples in our training materials at http://bit.ly/PA_Sec3_Training.

³⁹ 5 CCR § 15496(a) (emphases added).

⁴⁰ 5 CCR § 15496(a).

⁴¹ While we understand that charter schools submit their LCAPs to their charter authorizers and COEs, neither the charter, the authorizer, nor the county office has an obligation to review or post these plans publicly. The California Department of Education only posts LCAPs for school districts. As a result, we were only able to find a handful of charter school LCAPs through COE websites.

⁴² See 5 CCR § 15496(b)(5).

⁴³ Charter school LCAPs also lacked clarity with respect to annual measurable outcomes, which will eventually need to be incorporated into the charter petition. Many charter LCAPs lacked specific data and targets for student subgroups. Yet this information is supposed to serve as the trigger for intervention from the charter authorizer.

⁴⁴ Educ. Code § 52060(d)(3).

⁴⁵ See Families In Schools, “Ready or Not: How California School Districts are Reimagining Parent Engagement in the Era of Local Control Funding Formula,” (Feb. 2016) at p.5 (“Families In Schools Report”), available at http://bit.ly/FIS_LCFF.

⁴⁶ Expected Annual Measurable Outcomes, Goal 5.3, Oakland Unified School District 2015-16 LCAP, at p.184.

⁴⁷ State Board of Education March 2016 Agenda, Item 23 Memo, “Developing a New Accountability System: Update on the Local Control Funding Formula,” Attachment 2, available at <http://www.cde.ca.gov/be/ag/ag/yr16/agenda201603.asp>.

⁴⁸ Conversely, one district claimed to have spent almost exactly what was allocated for all but one expenditure, amounting to just a \$5,000 discrepancy. This raises questions about how accurately the district reflected its actual estimated spending in the LCAP.

⁴⁹ This advice is consistent with CCSESA’s LCAP Guide that emphasizes COEs’ important role in supporting LCAP implementation.

⁵⁰ See, e.g., PICO California *et al.*, “Best Practices in LCFF Implementation: Developing a Culture of Authentic Parent Engagement and Shared Decisionmaking,” at <http://bit.ly/LCFFparents>.

⁵¹ Families In Schools Report, http://bit.ly/FIS_LCFF, at p.4; see also J. Koppich *et al.*, “Two Years of California’s Local Control Funding Formula: Time to Reaffirm the Grand Vision” (December 2015) (noting that stakeholder engagement is “very much a work-in-progress”).

⁵² See, e.g., WCCUSD 2015-16 Interactive LCAP <http://www.wccusd.net/Page/5292>.

⁵³ Educ. Code § 52060(d)(3).

⁵⁴ See F. Yao & M. Sellers, “Learning a Lesson on Empowerment from Oakland Students,” (July 21, 2015) at <http://bit.ly/1VBHnzx>.

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