

October 26, 2021

Linda Darling-Hammond, President and
Members of the State Board of Education
State Board of Education
1430 N Street
Sacramento, CA 95814
Via email: SBE@cde.ca.gov

Re: The Local Control and Accountability Plan (LCAP) Template – Adoption of the Revised Local Control and Accountability Plan Template and the Template for the One-Time Supplement to the Annual Update to the 2021 – 22 Local Control and Accountability Plan

Dear President Darling-Hammond and Members of the State Board of Education:

We respectfully submit this letter on behalf of the Curriculum and Instruction Steering Committee (CISC) and Business Administration Steering Committee (BASC) of the California County Superintendents Educational Services Association (CCSESA). We appreciate the opportunity to provide input over the last several months.

Nineteen months into the pandemic, Local Education Agencies (LEAs) are expressing frustration, exhaustion and weariness. They are responsible for implementing COVID protocols, managing contact tracing, hiring and maintaining staffing, the daily operations of their districts, all while ensuring equity and improving academic and social-emotional outcomes for students. It is also important to highlight that 40% of districts and the majority of charter schools have fewer than 1,000 students, leaving the responsibility of multiple plans being developed and implemented as well as instructional leadership in the hands of minimal, and sometimes singular staff. While required by statute, complex changes and additional steps with the 21-22 LCAP Template and Supplement add significant, additional demands to LEAs that ultimately take away from the direct work and support for students and families.

After a year of mixed delivery instructional models including, hybrid, cohorted, concurrent, independent study, distance learning, and more, the focus for LEAs should be on accelerated learning, effective academic interventions, and social-emotional support. Constantly changing templates, additional plans and new requirements mean that far too much time is spent on learning templates, processing instructions, and developing plans that feel compliance-driven rather than in support of strategic planning.

Therefore, we request minimal changes and hope that those that are adopted support students, educational partners, and LEAs without becoming overly burdensome or far-reaching. It is imperative that the revised Template and Supplement include only the components required by statute and only those that are required right now. It is essential that the revisions do not require additional items beyond what is required by statute and that the LCAP continues to be used as a tool for strategic planning in order to best serve students.

LEAs are expressing sincere concern that the focus of the LCAP is moving away from a local accountability document to a compliance document. Ultimately this results in a decreased focus on students and families. For the current LCAP Template and Supplement, we must find a balance between increasing clarity and adding confusing instructions, which may cause more confusion and unsettledness for LEAs.

Based on the fact that the LCAP instructions have the full force of the law and supersede the LCAP prompts we are concerned that the following instructions are not supported by EdCode:

“The percentage of improved services for an action corresponds to the amount of LCFF funding that the LEA estimates it would expend to implement the action if it were funded.”

The written instructions imply that a quality increase can only be described in terms of dollars. This is not only NOT written nor implied in the EdCode but also undermines California’s mutual accountability system and opens the door for a return to categorical funding models that stripped both local control and local accountability from our LEAs. The demonstration of how the action or service will increase or improve services is already required in the action and in the increased and improved services section. There is nothing to imply that such a described qualitative action or service must be quantified in dollars. Instead, it must be described as a percent.

The regulation states that funds apportioned on the basis of the number and concentration of unduplicated pupils shall be used to increase services (grow services in quantity) or improve services (grow services in quality) for unduplicated pupils compared to services provided to all students in the proportion to the increase in funds apportioned on that basis. (5 CCR sections 15495(k) and (l); 15496(a).) As such, there is no spending requirement. Defining quality improvements only in terms of dollars is not a reasonable interpretation of Ed Code, and should not be mandated.

Additionally, it is our desire to maximize the time and opportunity to prepare and deliver thoughtful and comprehensive training as well as ensure statewide calibration as we move towards implementation of the LCAP Template and Supplement. CISC and BASC look forward to partnering with both SBE and CDE to develop comprehensive training and technical assistance to provide clarity around the changes and new requirements. Specifically, it is critical to focus on training and support around increased and improved services so that LEAs have a strong understanding of the types of actions that can be counted as qualitative improvement and how the value is determined and measured.

As county offices of education, our goal is to build trusting relationships with our education partners, including LEAs, students, families, and other organizations. Thank you for your leadership and support for California’s public schools and students. We appreciate your consideration of our comments and look forward to our continued partnership as we work together to train and implement the revised LCAP template.

Sincerely,

A handwritten signature in black ink, appearing to read 'JHicks', followed by a long, horizontal, wavy line.

Jennifer Hicks, Assistant Superintendent, Educational Services
Placer County Office of Education

Chair, CISC

Dean West

Dean West, Associate Superintendent of Business Services
Orange County Department of Education
Chair, BASC

Cc:

Brooks Allen, Executive Director, SBE
Sara Pietrowski, Policy Consultant, SBE
Cheryl Cotton, Deputy Superintendent, CDE
Dr. Daniel Lee, Deputy Superintendent, CDE
Lindsay Tornatore, Director, CDE
Joshua Strong, Administrator, CDE