



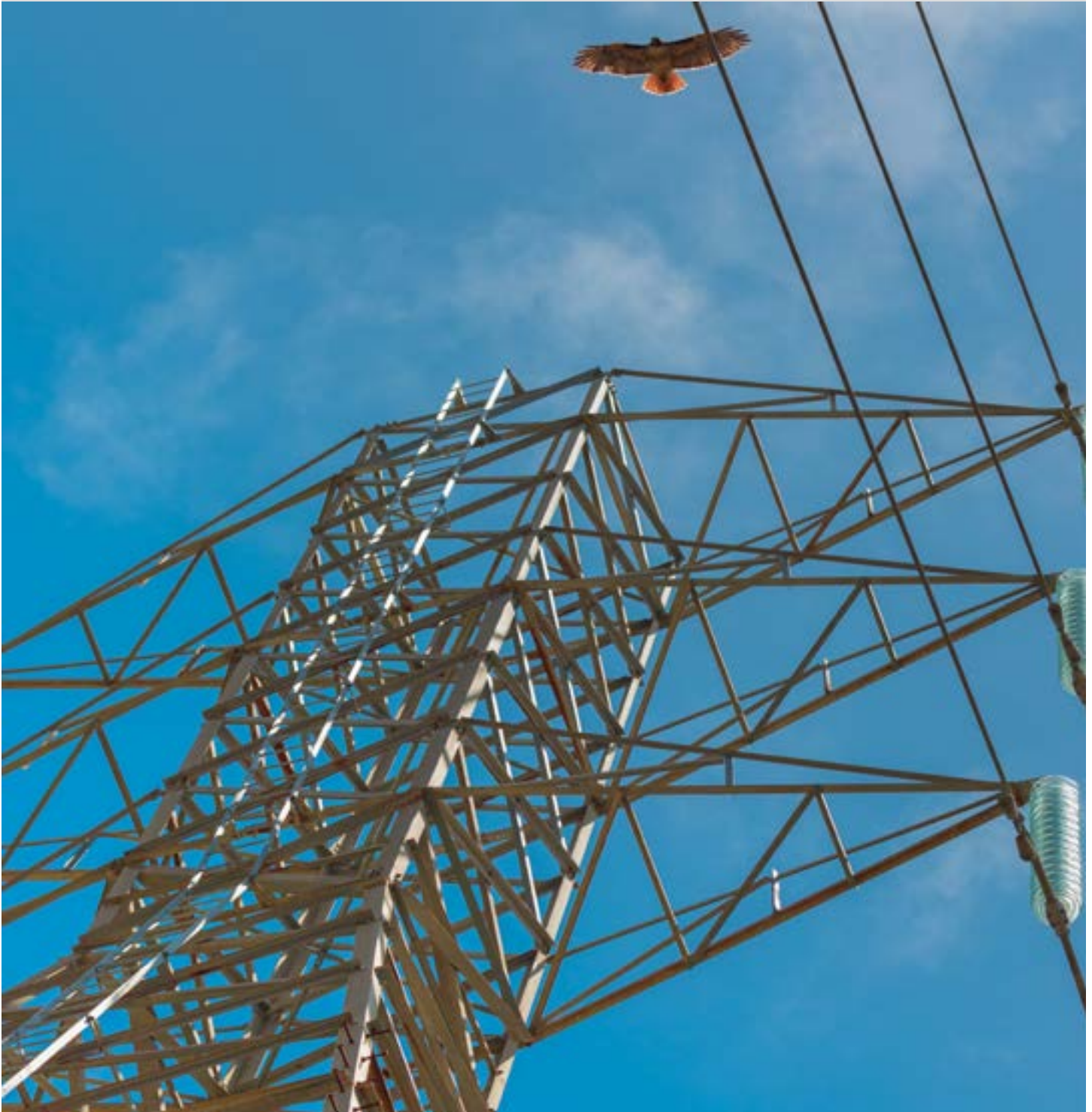
CCSESA

California County Superintendents
Educational Services Association

Public Safety Power Shutoff Annex

FOR CALIFORNIA COUNTY OFFICES OF EDUCATION

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Purpose

Purpose

This planning document outlines planning objectives and procedures to provide guidance for county offices of education (COEs), their member school districts, and coordination with COEs' regional partners in the event of a planned power outage (de-energization of electrical systems), also known as a **Public Safety Power Shutoff (PSPS)**. This is a supporting document or annex to existing CCSESA Emergency Recovery Guide for California County Offices of Education, and the CCSESA Technology Steering Committee Information Technology Disaster Recovery Plan.

Public Safety Power Shutoff Background



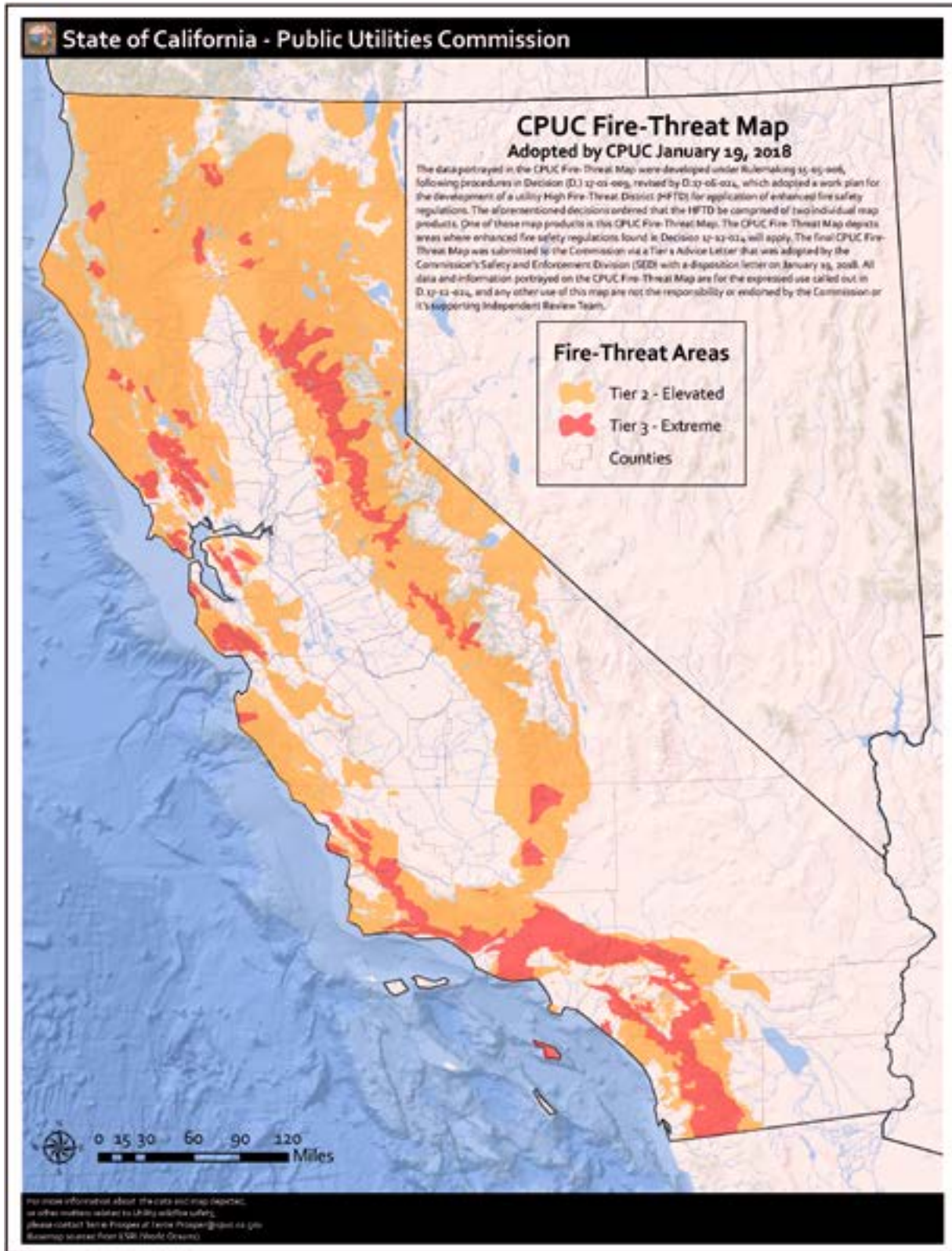
California has experienced unprecedented wildfire activity in recent years. The California Public Utilities Commission (CPUC) adopted de-energization guidelines on June 4, 2018, authorizing Pacific Gas and Electric (PG&E) and Southern California Edison (SCE) to improve community safety by allowing PG&E and SCE to de-energize portions of their electrical systems in cases of significant fire threat. The threat of a PSPS will continue until the PG&E and SCE transmission and distribution grid can be “hardened.”

Although the CPUC gave PG&E and SCE permission to de-energize local distribution lines, the June 4, 2018 guidelines incorporated the de-energization of transmission lines affecting the energy distribution to entire California regions in other parts of the state.

A PSPS will most probably result from weather conditions affecting the electrical system in areas defined by the CPUC as Tier 2 (Elevated) or Tier 3 (Extreme) risk areas (see [map CPUC_Fire-Threat_Map_final.pdf](#)).

The factors considered in a decision to initiate a PSPS include high temperatures, high/gusting winds, and low relative humidity. Any decision to initiate a PSPS could be based on a geographic area well outside of the service area.

Purpose



PSPS Planning Considerations

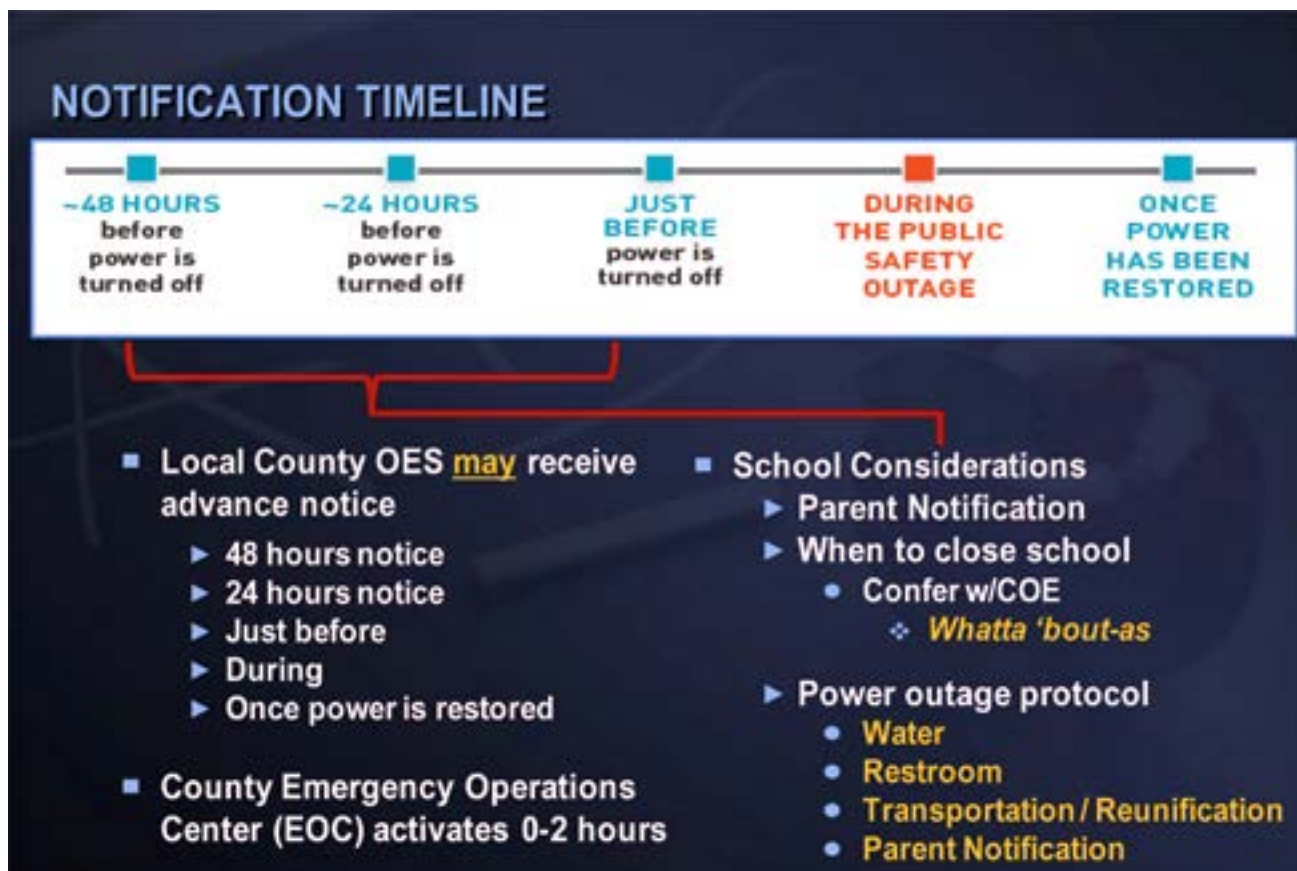
PSPS Planning Considerations

Unlike natural disasters that provide no advance notice, PSPSs are intended to include a notification timeline since the energy companies monitor the qualifying PSPS triggers (Red Flag warning, humidity levels, winds, fuels, real-time observations). A PSPS can last from hours to consecutive days depending on the severity of the triggers. Subsequently, schools should have various contingencies for a prolonged five-plus-day power loss and re-energizing activities. Planning considerations for a prolonged PSPS are the following:

- Contingency plan/protocol for a PSPS called before a school day
- Contingency plan/protocol for a PSPS called during a school day
- Decision matrix for a full-district vs. partial-district closure
- Contingency plan for child nutrition/food service food storage during a PSPS
- Proactive parent notification/communication
- Proactive staff notification/communication
- Mid-PSPS event parent communication
- Mid-PSPS event staff communication
- Contingency plan for continuation of government (payroll processing, purchasing, warehousing)
- Identification of essential vs. nonessential personnel.
- J-13 attendance waiver management

PSPS Notification Timeline Considerations

PSPS Notification Timeline Considerations



Electrical power utilities have indicated that the notification window period can vary from no notice to 48 hours per PSPS. Subsequently, school emergency planners should have the following considerations in place:

24-48 Hours' Notice – Whether to close school:

- ❑ Prepare for a PSPS by developing a decision matrix on whether to keep schools open or closed.
 - The decision matrix should have the following considerations:
 - Decision to close the entire district, or specifically the affected school sites (depending on district size).
 - Determination of whether school is the safest place for students during a PSPS. If so, what type of program to offer (reduced day, regular day).
 - Student safety traveling to/from school in the event of a mid-day PSPS
 - Student transportation during a mid-day PSPS.
 - Student/parent reunification during a mid-day PSPS.
 - Student/parent/staff communication during a mid-day PSPS.
 - Any previous J-13 waivers for ADA and/or instructional minutes.

PSPS Notification Timeline Considerations

- Availability of emergency/disaster days built into the district work calendar (e.g., snow/fog days).
- Consideration for after-school events/programs (ASES, YMCA, sports, etc.).
- ❑ Establish a protocol for no power at 5:30 a.m. on a school day.
 - Staff notification including transportation and food service.
 - Food service supply receiving contingency.
- ❑ Establish a protocol/conduit/method for the district superintendent to communicate with school constituencies via local radio, TV, district website, auto dialer, school-site postings/distribution.
- ❑ Parent notification with contingencies for a no-notification PSPS
 - Auto dialer/auto email scripts written in advance
- ❑ Contingency for food storage
- ❑ Contingency for drop-n-dash students at school sites
- ❑ Self-report on the Schools Emergency Reporting System (SERS)
- ❑ Predetermined developed plans for a no-notice PSPS (below)

No-Notice PSPS – Continuing the School Day:

In the event of a no-notice immediate PSPS affecting multiple school sites, or a power outage affecting one school site, planners should consider the following considerations:

- ❑ Water source: Well pump affected during PSPS or municipal water running from generators.
 - Well water: Open purchase order previously established for portable toilets.
 - Well water: Potable water: bottled water from district central kitchen/locally stored, or Open Purchase Order to a water delivery company.
- ❑ Fire watch*: school site protocol for designating a fire watch employee when fire alarms are not functional/unpredictable without power.
- ❑ Self-report on the Schools Emergency Reporting System (SERS)
- ❑ Transportation notification: Contingency for notifying parents about the bus schedule and reunification contingency.
- ❑ Food service/child nutrition: Breakfast/lunches served depending on time of day.
- ❑ Written communication regarding the following school day (school open/closure contingency, e.g., No power at 0700) printed in advance for distribution

*Fire watch: **Fire watch** is when a person is assigned to keep **watch** on hot work and **fire** hazards in an area that does not have automatic **fire** warning systems or **fire** suppression systems. See US Department of Labor/Occupational Safety and Health Administration requirements for established policy, assignment, and training at <https://www.osha.gov/laws-regs/regulations/standardnumber/1915/1915.504>

** Consult with your local fire agency as local regulations might require different actions.

PSPS Preparation

PSPS – 001 PSPS Preparation – Establishing Contacts

Date Implemented: 1 August 2020 Date Revised: 1 August 2020

Prepare for a PSPS by identifying and establishing key communication contacts **before an event**. During large scale events, COE/district leadership will rely on the energy company and the county office of emergency services (OES) for accurate, sound information during the PSPS. A COE/district should not post/communicate PSPS information that is inconsistent with the county office of emergency services and local power provider public messaging.

- Establish a PSPS contact with the COE’s/district’s energy provider
- Identify circuits in school district
- Create circuit listing (example below)
- Establish contact with the COE’s/district’s county office of emergency services (OES).
- Establish “continuation of government” contact with local county officials/county office of education for procurement and payroll processing.
- Establish contact with CDE’s Emergency Services Team at EmergencyServices@cde.ca.gov / 916-323-5025
- Establish protocols/procedures for superintendent to communicate with affected parties utilizing available platforms:
 - Parents
 - Staff
 - Local radio / TV
 - District website
 - Auto dialer
 - School site posting/distribution

Example School District Circuit Listing:

Customer Name	Site	Serv Acct Address
Goleta Union High School District	Brandon	192 Brandon St.
Goleta Union High School District	District Office	401 N. Fairview Ave.
Goleta Union High School District	El Camino	5020 San Simeon Dr.
Goleta Union High School District	El Rancho	Anacona/Mirano
Goleta Union High School District	Ellwood	7686 Hollister Ave.
Goleta Union High School District	Foothill	711 Ribera Dr.
Goleta Union High School District	Hollister	4950 Anita Ln.
Goleta Union High School District	Isla Vista	6875 El Colegio Rd.
Goleta Union High School District	Kellogg	475 Cambridge Dr.

PSPS Preparation

Date Implemented: 1 August 2020 Date Revised: 1 August 2020

PSPS events are especially difficult because of the obstacles in communicating with students, parents, families and the public without electricity to power COEs/district's normal communication methods. Therefore, notification should be written and communicated before a PSPS by doing the following:

- Writing and distributing a proactive PSPS event letter to parents.
- Writing and distributing a proactive PSPS event letter to staff.
- Preparing and posting proactive PSPS information to the school district's website.

Example Parent Letter

Dear [district] Parents/Guardians,

[Name of energy company] has written a plan to shut off power to our local region when high risk wildfire conditions occur:

- Winds of 25 mph or more with gusts in excess of 45+ mph
- Low humidity
- Dry fuel/vegetation

[Name of energy company] refers to this event as a Public Safety Power Shutoff (PSPS), and it is used to avoid a wildland fire sparked by power lines.

As a school district, student and staff safety are our highest concern. The loss of electrical power will affect our schools. We have developed the following plan for when a local PSPS takes place:

1. **If power is shut down during the school day, the school would remain in session** until the end of the normal school day. After-hours school events that require use of power will be canceled.
2. If/when it becomes known that the next day(s) will be without power, **school will be canceled.**

The factors leading to the decision to cancel school if a known outage will occur:

- Many traffic signals will be out, making bus and vehicle traffic more dangerous.
- Fire alarm systems will lose power after approximately 24 hours.
- Emergency services (police/fire/paramedic) may be strained during these events.
- Maintaining nutrition services will be difficult because of lack of refrigeration.
- Home-school communications will have limitations.

We encourage all families to have reserve food and water supplies, and to follow all guidance and suggestions from [insert energy company name] as well as local authorities.

Finally, on each day of the event, we will make every possible attempt to update our families on the status of school for the following day. It is imperative that the schools have your accurate contact information. Please update your cell number and email address in [district's parent communication system] or contact

PSPS Preparation

your school's secretary if you need help. In addition, please download the [district name's] mobile app from your provider's app store and register for an account; much of our communication during a PSPS will be conveyed by the app.

We will continue to monitor PSPS circumstances and keep you informed.

Sincerely,

[district superintendent signature]

Example Staff Communication

Good morning,

Further clarification about the [name of energy company] potential for a Public Safety Power Shutoff (PSPS).

If/when school is canceled for a full day, staff will not need to report to work. We are reasonably confident that we will be funded through an emergency waiver from the California Department of Education, so we would not need to make up the lost day(s) of school at the end of the year.

This is a new, somewhat fluid state policy. In the future, if we receive word from the state that an emergency waiver is not allowed, we would enter into discussions with CTA and CSEA to deal with that development. For now, there is no reason to develop make-up schedules or expect that we will need to do so.

Example Web Page Text

Emergency Preparedness

[Name of school district] School District continuously plans and prepares for emergencies that could interrupt the school day for students. We want to make sure that you are fully informed of our Emergency Operations Plan.

Emergency Contacts:

IMPORTANT: At the beginning of every school year, you receive a number of forms to complete. The online registration or Homelink account includes your emergency contact information. It is VITAL that we have accurate contact information so you can be reached in case of an emergency.

In the event of an emergency, **DO NOT COME TO THE SCHOOL UNLESS DIRECTED TO DO SO.**

You will be contacted via text, email, phone, and push notification in the [name of district] mobile app. School staff will stay with your child until you, or an adult you previously authorized, can pick up your child. When you arrive at the school, staff will help you properly sign out your student.

Reunification

Students may be moved to another location to provide better and more direct care. The district administration and emergency personnel will make this decision based on current conditions, including building safety and the length of time that students may need to remain in the care of school staff. If relocation is necessary, schools will alert parents, informing you about where your child is being cared for. This information will also be posted on the district's website and provided to the media.

PSPS Preparation

School Site Emergency Plan

School sites plan how to respond and recover from an emergency, disaster or event resulting in the disruption of normal school operations.

The district and our emergency responders work together to conduct districtwide trainings and update every school's safety plan. Your school's emergency plan may be viewed in the school's main office.

If your child has special needs that require additional assistance in an emergency, you can work with school staff to develop an individualized emergency plan.

Example Press Release

FOR IMMEDIATE RELEASE

Date:

Contact: Public Information Officer at ###-###-####, email address

(Insert name of jurisdiction) Responds to [energy company name] Potential Power Shut-Off with Advanced Preparation

[Insert name of jurisdiction] –[Name of energy company] has notified [insert name of jurisdiction] that they may activate their Public Safety Power Shut-Off protocols because of extreme weather, and could initiate a power shutdown in the [city/ unincorporated area of name] of [county name] County within the next 24 hours. [insert name of jurisdiction] is ready to respond to the effects of the power outage; however, only [power company name] decides when to turn *off* the power and manages how quickly it is restored.

The [insert name of jurisdiction] has developed a Public Safety Power Shutoff Contingency Plan that has been put into motion. You can check whether your home is in an area where power may be shut off on the {name of energy company} website: [https:// \[insert URL.com\]](https:// [insert URL.com])

[Insert name of jurisdiction] officials remind residents and visitors that it is important to have a plan. FEMA recommends taking steps to prepare for a power outage, including:

Review your evacuation and communication plan -

- Identify several evacuation routes for your location in case roads are blocked, and tell someone out of the area which routes you plan to use.
- If you will evacuate by car, keep your car fueled and ready to go.
- Make a list of what you'll want to take with you if you leave your home quickly. Consider the five Ps of evacuation:
 - 1) People/pets; 2) Prescriptions; 3) Papers; 4) Personal needs; 5) Priceless items
- Talk to your medical provider about a power outage plan for medical devices that require electricity and refrigerated medicines. Plan for batteries and other alternatives to meet your needs when the power goes out.
- Review the supplies that are available in case of a power outage. Have flashlights with extra batteries for every household member. Have enough nonperishable food and water.
- Use a thermometer in the refrigerator and freezer so that you can know the temperature when the power is restored. Discard food if the temperature is 40 degrees or higher.

PSPS Preparation

- Keep mobile phones and other electric equipment charged and gas tanks full.
- Know how to manually open electric garage doors and gates.

For more information, including what to do during a power outage, visit www.ready.gov.

Make sure you can receive updated information from [energy company name] by updating your contact information at [energy company website]

PSPS Preparation

PSPS – 003 PSPS Preparation – Electronic Communication

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

Many COEs and school districts utilize electronic services for parent and staff communication. Although automated attendance tracking auto-dialers and substitute teacher notification services are not designed for emergency communication, most of these services can be used for mass notification. These services are especially useful during a PSPS because they are physically housed in areas not affected by a local PSPS. The COE or district administrators can access these systems remotely during a PSPS warning period, or during a PSPS outage, making them a valuable communication tool.

- Prepare notification scripts and upload to the COE's/district's parent communication system/auto dialer.
- Prepare district webpage notifications and upload to web server, but hide the page so it can be easily activated remotely during a PSPS warning or PSPS event.

PSPS Preparation

PSPS – 004 PSPS Preparation – Register District in SERS

Date Implemented: 1 March 2022

Date Revised: 1 March 2022

- ❑ Review EM – 008 in the CCSESA Emergency Recovery Guide for registering the district in the California Department of Education’s School Emergency Reporting System (SERS).

SELF REPORTING DISASTERS

Type	Number	Affected Schools	Reported
Wildfire	000000010	4	Feb 22, 2022

- Select “Report New Incident”
- Can be used with any incident affecting schools or closures
- Can be used to communicate with the public



S.E.R.S
Schools Emergency Response System

PSPS Preparation

Date Implemented: 1 August 2020 Date Revised: 1 August 2020

The period between a PSPS warning and a PSPS event could be fraught with indecision regarding whether to continue with a normal school day, or to proactively cancel school. In areas that have numerous factors to consider, many emergency managers use a decision matrix listing various decision points as well as describing the underlying criteria used. Weights are assigned to specific criteria.



Formulate a PSPS school closure decision matrix utilizing the following considerations:

Decision to close the entire district, or specifically the affected school sites (depending on district size).

Determination of whether school is the safest place for students during a PSPS. If so, what type

of program to offer (reduced day, regular day).

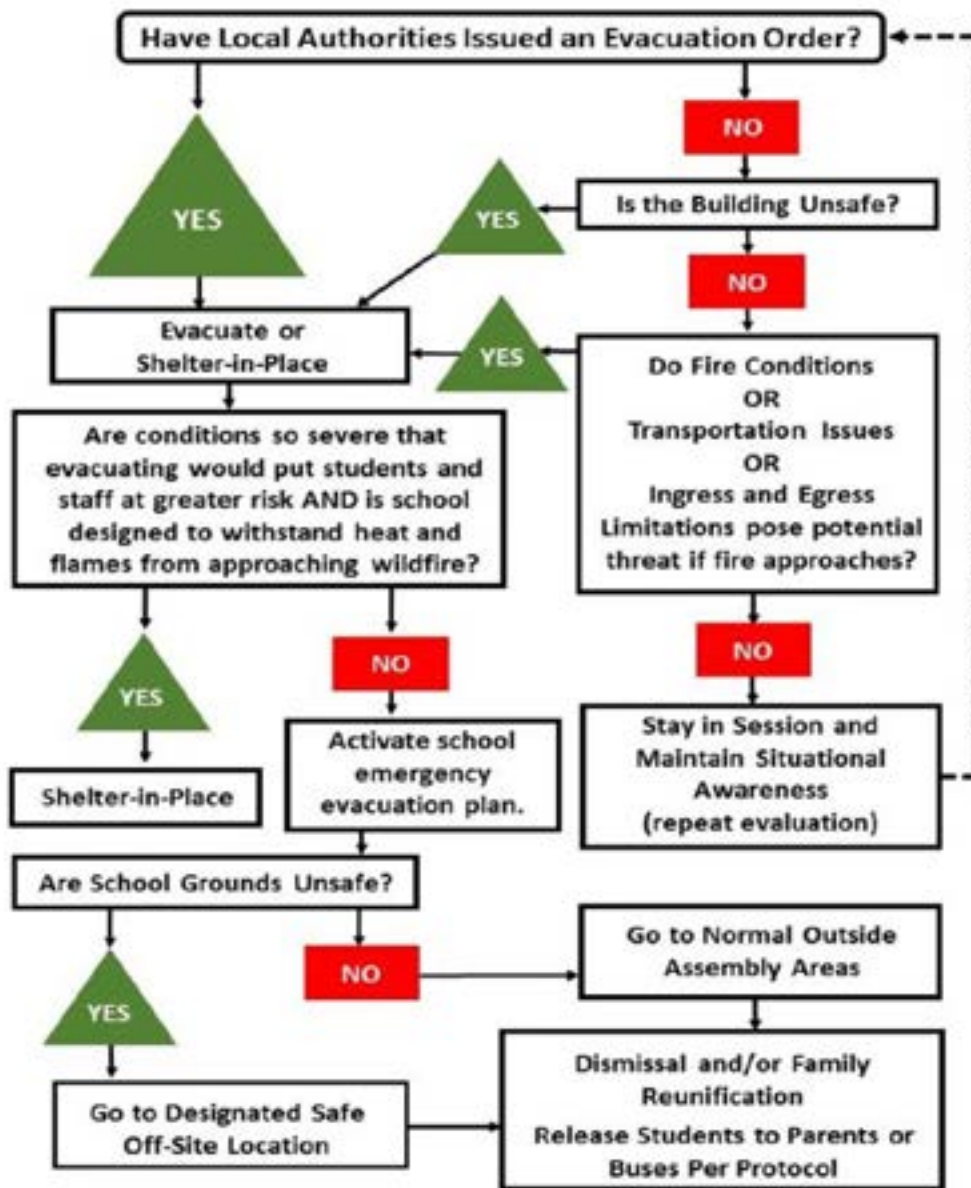
- Student safety traveling to/from school in the event of a mid-day PSPS.
- Student transportation during a mid-day PSPS.
- Student/parent reunification during a mid-day PSPS.
- Student/parent/Staff communication during a mid-day PSPS.
- Any previous J-13 waivers for ADA and/or instructional minutes.
- Availability of “emergency days” in collective bargaining agreements/district calendars.

PSPS Preparation

- Consideration for after-school events/programs (ASES, YMCA, sports, etc.).
- Impacts to fire suppression alarms and water supply system.
- Impacts to water and wastewater systems.
- Include a decision point to contact the county superintendent and the county office of emergency services manager to communicate the district's decision and contingencies.

Example Decision Matrix

Below is an example of a fire-evacuate decision matrix:



PSPS Preparation

PSPS – 006 PSPS Preparation – Continuation of Government Functions*

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

During a PSPS event, certain critical functions driven by statute, deadlines, and/or nature requires specific staff members being on duty despite the lack of electricity.

- Identify mission critical functions during a PSPS:
 - Oversight:
 - Incident commander/incident chief/public information officer
 - Provides oversight and direction during a PSPS
 - Acts as PIO to staff, students, parents, community
 - Primary contact to county office of emergency services
 - Payroll:
 - Finance system access
 - Printer/folder/sealer functionality
 - Continuation of government primary contact access (cell, email, in-person) at the county treasury or county office of education
 - Identified delivery method(s) to county treasury
 - Electrical power delivery from generator (e.g., extension cord management/safety)
 - Purchasing (required supplies, fuel during a PSPS)
 - Vendor maintenance
 - Infrastructure:
 - IT data backup/recovery
 - IP telephony connectivity/functionality (if any)
 - Water (well or municipal)
 - Communication channels (website, social media, auto dialer, etc.)
 - Facilities:
 - Swimming pools
 - Freezer/refrigerator power
 - Generator monitoring/fuel management
 - Building security

PSPS Preparation

- Food/perishables management (relocate perishables drivers)
- Essential personnel safety (lighting, electricity relocation, etc.)
- Student Health
- Refrigerated medicine management
- County office of emergency services (COE only)
 - Communication with school district representatives
- Establish PSPS functions/operations organizational chart
 - Similar to district emergency operations flowchart

** Continuity of Government was developed during WWII in reaction to the Battle of Britain and gained urgency during the nuclear proliferation era. Later changed to the "Continuation of Government," it holds the principle of "establishing defined procedures that allow a government to continue its essential operations during catastrophic events."*

PSPS Preparation

PSPS – 007 PSPS Preparation – Identify Continuation of Government Personnel

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

Identify Continuation of Government* staff before a PSPS since it will make PSPS planning and communication much easier and clarify which employees should report to work during this event.

- Determine district critical staff required for maintaining COE's/district's core mission and safety during a PSPS and who can fill the functions listed in PSPS-005.
 - Payroll processing
 - Facility monitoring (facility security, refrigerators, swimming pools)
 - Child nutrition/food Service (managing frozen stock)
 - Generator monitoring / fuel monitoring
 - Purchasing/procurement
 - IT infrastructure monitoring/data backup restoration
 - General employee safety monitoring since many of these functions might require the use of makeshift processes.
 - Establishment of fire watch** duties for buildings that do not have fire alarm service and are inhabited by employees during a PSPS.
 - County office of emergency services (COE only)
 - COE agency representative(s)
- Notify respective employees who are considered essential staff and must appear to work as identified emergency service workers.
- Notify essential staff to keep vehicle fuel tanks full.



* *Continuity of Government* was developed during WWII in reaction to the Battle of Britain and gained urgency during the nuclear proliferation era. Later changed to the “Continuation of Government,” it holds the principle of “establishing defined procedures that allow a government to continue its essential operations during catastrophic events.”

** **Fire watch:** **Fire watch** is when a person is assigned to keep **watch** on hot work and **fire** hazards in an area that does not have automatic **fire** warning systems or **fire** suppression systems. See US Department of Labor / Occupational Safety and Health Administration requirements for established policy, assignment, and training at <https://www.osha.gov/laws-regs/regulations/standardnumber/1915/1915.504>

PSPS Preparation

PSPS – 008 PSPS Preparation – Purchasing/Vendors

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

During a PSPS, a number of considerations related to purchasing and vendor management require advance planning.

- Establish/maintain an open purchase order for portable toilets in the event of a mid-day local power outage or PSPS.
- Establish/maintain an open purchase order for bottled water (individual and staff room size) for schools that do not have potable water during a power outage.
- Maintain list of primary vendor contacts for stop delivery notifications in the middle of a PSPS (food, perishables, fuel, etc.).

PSPS Preparation

PSPS – 009 PSPS Preparation – Facility Preparation

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

During a PSPS, a number of considerations related to facilities require advance planning.

- Utilize/identify facility closure procedure for summer
- Disable heating, ventilation, air conditioning (HVAC) services in buildings.
- Close windows
- Secure gym and other community use facilities.
- Identify perishable goods location and whether those goods are to be saved, or distributed to families.
- Identify existing generators and their electrical capability.
- Identify portable generators and where they would be located/utilized in a PSPS.
- Prepare any transportation vehicles by keeping fuel tanks at least half-full.
- Create a backup fuel plan utilizing fuel tanks (gasoline, diesel) from available pool vehicles.

PSPS Event

PSPS – 0010 PSPS Event – Coordination & Management

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

During a long term power outage/PSPS, the following activities should be monitored.

- District incident commander establishes a daily check-in with essential staff
- District incident commander establishes a situation status worksheet
- District incident commander establishes with county office of education and/or county office of emergency services schools Agency Representative (AREP).
- District incident commander notifies staff, community, parents regarding school status.

Post PSPS Event

PSPS – 011 PSPS Event – Update SERS and County EOC

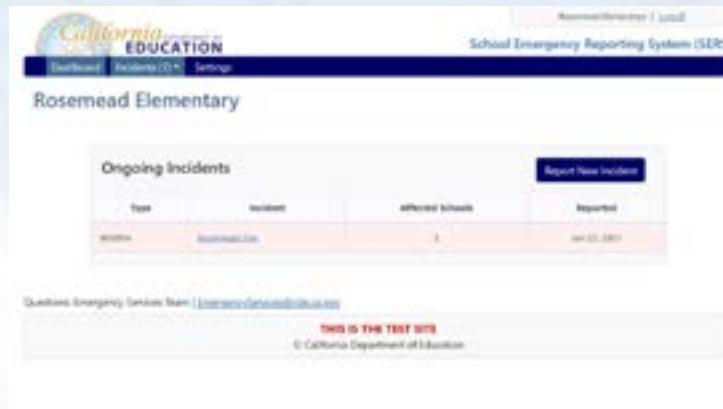
Date Implemented: 1 March 2022

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During a long term power outage/PSPS, the following activities should be monitored.

- Utilize EM – 008, update school/district status in SERS.
- Update CDE’s Emergency Services Team at EmergencyServices@cde.ca.gov / 916-323-5025
- Utilize your county’s method for communication (e.g. WebEOC), update/convey your school/district status with the County Emergency Operation Center (EOC) if the County has stood up the EOC for this PSPS event.

SELF REPORTING DISASTERS



- Select “Report New Incident”
- Can be used with any incident affecting schools or closures
- Can be used to communicate with the public



S.E.R.S
Schools Emergency Response System

Post PSPS Event

PSPS – 012 Post PSPS Event – After Action & Improvement Plan

Date Implemented: 1 August 2020

Date Revised: 1 August 2020

An After Action report is essential to PSPS plan improvement.

- After-action reports are essential; build time for them.
- Conduct after-action briefings or meetings.
- Review response actions.
- Suggest necessary modifications to plans and procedures in the form of improvements rather than deficiencies.
- Identify training gaps.
- Identify infrastructure issues related to PSPS actions.
- Highlight accomplishments.
- Complete an improvement schedule (example below).

An example improvement schedule matrix table in Microsoft Word format, to be performed during and after the after-action report, is available from:

<https://www.calhospitalprepare.org/sites/main/files/resources/Improvement%20Plan%20Matrix.DOC>

Post PSPS Event

Improvement Plan (IP) Matrix

Observation	Recommendation	Corrective Action Description	Capability Element	Primary Responsible Party	Responsible Party POC	Start Date	Completion Date
Capability 1: [Capability Name]							
Observation 1.1.1:	1. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
	2. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
Observation 1.1.2:	3. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
Capability 2: [Capability Name]							
Observation 2.1.1:	1. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
	2. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
Observation 2.1.2:	Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
Capability 3: [Capability Name]							
Observation 3.1.1:	1. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
	2. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date
Observation 3.1.2:	3. Recommendation	1. Corrective Action	Element	Facility/Dept	Position	Date	Date
		2. Corrective Action	Element	Facility/Dept	Position	Date	Date

Post PSPS Event

PSPS – 013 Post PSPS Event - Submit J-13A form to California Department of Education

Date Implemented: 1 August 2020 Date Revised: 1 August 2020

After-action reports are essential to PSPS plan improvement.

- Determine whether affected district(s) are able to submit an Average Daily Attendance (ADA) J-13 form from the California Department of Education.
- Obtain any city or county emergency proclamations associated with the PSPS.
- Have attendance accounting staff review the following CDE websites:
 - Instructional time and attendance accounting <https://www.cde.ca.gov/fg/aa/pa/instructionaltime.asp>
 - Instructional time penalty calculation <https://www.cde.ca.gov/fg/au/ag/statecomp.asp#eaf>
 - Request for Allowance of Attendance Due to Emergency Conditions (Form J-13A)
<https://www.cde.ca.gov/fg/aa/pa/j13a.asp>
 - Education Audit Appeals Panel *Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting* <http://eaap.ca.gov/audit-guide/current-audit-guide-booklet/>

Direct questions to: attendanceaccounting@cde.ca.gov.

Post PSPS Event

School Fiscal Services Division
California Department of Education
March 6, 2019

SCHOOL ATTENDANCE & FUNDING DURING EMERGENCIES

INSTRUCTIONAL TIME REQUIREMENTS IN CALIFORNIA

- The majority of a local educational agency's (LEA) funding is based on average daily attendance (ADA). Funding is allocated through the Local Control Funding Formula (LCFF), which is primarily based on ADA.
- California *Education Code (EC)* establishes instructional time requirements that regulate the calculation of ADA for all LEAs and establishes fiscal penalties if these requirements are not met. Statutory requirements for instructional time include annual number of school days and minute requirements as well as minimum minute per day requirements. Each requirement is distinct with its own fiscal consequence. Attendance and instructional time requirements vary by type of LEA, educational setting, and grade span.
- Daily and annual instructional time requirements are not waivable by the California State Board of Education (SBE); however, statute does provide authority to the SBE to waive fiscal penalties for not meeting annual instructional time requirements if the LEA makes up twice the instructional time they failed to offer.

J-13A WAIVER PROCESS

- In the case of emergencies, statute¹ allows the State Superintendent of Public Instruction to approve credit for instructional time losses in the event of school closures as well as ADA credit for material decreases in ADA. This process is known as the J-13A process. ADA credit restores LEAs to the ADA they would have normally earned.
- The intention of the J-13A process is to mitigate the loss of funding that would otherwise occur as a result of the emergency. As depicted in the table below, the number of J-13A approvals has increased over the past few years. This increase is due to a rise in wildfires, threats of school violence, epidemics, and inclement weather.
- When external auditors audit LEAs for compliance with instructional days and minutes, LEAs provide CDE J-13A approval letters to ensure that they are not penalized for approved closure days. LEAs also use CDE approval letters to substantiate ADA reported based on normal as opposed to actual ADA.

ADDITIONAL RESOURCES

- Instructional Time and Attendance Accounting
<https://www.cde.ca.gov/fg/aa/pa/instructionalttime.asp>
- Instructional Time Penalty Calculation
<https://www.cde.ca.gov/fg/au/ag/statecomp.asp#eaf>
- Request for Allowance of Attendance Due to Emergency Conditions (J-13A)
<https://www.cde.ca.gov/fg/aa/pa/j13a.asp>
- Education Audit Appeals Panel Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting
<http://eaap.ca.gov/audit-guide/current-audit-guide-booklet/>

QUESTIONS: ATTENDANCEACCOUNTING@CDE.CA.GOV

¹ School Closures: EC 41422; Material Decrease: EC 46392 and California Code of Regulations, Title 5, Section 428