



## California County Superintendents Educational Services Association

*Promoting, influencing, and advocating for high-quality education.*

June 7, 2022

The Honorable Gavin Newsom  
Governor, State of California  
1021 O Street, Suite 9000  
Sacramento, CA 95814

The Honorable Nancy Skinner  
Chair, Senate Budget and Fiscal Review Committee  
1021 O Street, Suite 8630  
Sacramento, CA 95814

The Honorable Phil Ting  
Chair, Assembly Committee on Budget  
1021 O Street, Suite 8230  
Sacramento, CA 95814

**Re: California County Superintendents' Response to Legislature's Budget Plan and Governor's May Revision (Budget Act of 2022–23)**

Dear Governor Newsom, Senator Skinner, and Assembly Member Ting,

On behalf of the California County Superintendents Educational Services Association (CCSESA), representing the 58 county superintendents of schools, we appreciate the May Revision and legislature's response to the May Revision focus on stabilizing fiscal policies and investments in student wellness and student academic success. Because the May Revision generally includes proposals from the Governor's Budget, we incorporate by reference CCSESA's letter dated February 11, 2022, which addresses investments not referenced here.<sup>1</sup> By way of the following in this letter, we provide for your consideration our recommendations and positions on the proposals outlined in the May Revision and Legislature's response to the May Revision.

### **1. School system fiscal stability for county offices of education.**

#### **Parity for county offices if Local Control Funding Formula (LCFF) is augmented** **Request to modify Legislative Version (Row #1810)**

The legislature proposes to increase LCFF funding for school districts and charter schools by an additional \$4.5 billion beyond the May Revision, for a total base rate increase of 16.2%. We applaud these investments into the LCFF base. Importantly, however, this proposal does not affect county offices of education (COE) funding in an equivalent way. COEs are not entitled to the proposed base increase for school districts and charter schools and COE LCFF funding is structured differently in general. The May Revision provided a proportionate increase through the county office LCFF formula (see below). To the extent the final budget includes an increase to district and charter LCFF, we urge the legislature and administration to provide an equitable augmentation for COEs.

#### **May Revision augmentation for county offices of education (COEs)** **Support May Revision and Legislative Version (Row #1813)**

The May Revision proposes an increase to the LCFF for all school districts, charter schools, and COEs (collectively "local educational agencies" or LEAs). Because county offices offer alternative education programs and other specialized services for LEAs, we strongly support the proposed LCFF funding. Like all local educational agencies, COEs rely on new LCFF investments to address the impacts of rising pension obligations, increased costs for goods and services, staffing shortages, and other operational needs. We urge your support for additional county office LCFF.

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1. California County Superintendents' Response to Governor's 2022–23 Budget (February 11, 2022), <[https://ccsesa.org/?wpfb\\_dl=7931](https://ccsesa.org/?wpfb_dl=7931)>.



**LCFF stabilization in the 2021–22 school year to mitigate COVID-19 effects**

***Support May Revision; Reject Legislative Version (Row #1812)***

Core county office services are impacted by average daily attendance (ADA) in two critical ways: (1) funding for at-promise youth served in alternative education programs and (2) the County Operations Grant that generates most revenue for counties and utilizes countywide ADA. We support the May Revision's proposal to mitigate the fiscal effects of the Delta and Omicron waves of COVID-19 through one-time fiscal protections for classroom-based LEAs.

**Extend to COEs the administration's proposal to stabilize annual changes to ADA**

***Request to modify May Revision and Legislative Version (Row #1811)***

We support the governor's proposal to stabilize the LCFF attendance calculation and urge policymakers to also include the at-promise students served by COEs. County offices directly serve California's at-promise youth. For nearly all these students, the intent is for the students to return to their district of residence, meaning county office enrollment and attendance fluctuates significantly. But county offices must nevertheless staff and operate high-quality educational experiences for these important student groups.

**2. Differentiated Assistance to help close achievement and opportunity gaps.**

**Differentiated Assistance funding to support charter schools and single-district counties**

***Support May Revision and Legislative Version (Rows #1814, 1815)***

Differentiated Assistance, offered since 2017 through the Statewide System of Support, leverages the regional expertise of the 58 county offices of education to aid school districts and the students they serve. Differentiated Assistance is a process where county offices of education provide individually designed assistance to districts and charter schools to address identified performance issues, with an emphasis on significant disparities in performance among student groups.

The May Revision proposes Differentiated Assistance funding to address ongoing disparities in student outcomes at charter schools, which is a requirement for county offices under the Legislature's landmark charter school reform bill, AB 1505 (2019). The May Revision also proposes to provide baseline Differentiated Assistance funding to the seven single-district counties (they are currently omitted from the formula) so they may fully engage in improvement planning and implementation for their students. We support both of these proposals.

**Increase Differentiated Assistance base grant for preventative universal supports in all 58 counties; apply cost-of-living adjustment; and prepare for spike in qualifying LEAs**

***Request to modify***

The COVID-19 pandemic has exacerbated long-standing achievement and opportunity gaps for California's students. To address these growing disparities, we request new investments in Differentiated Assistance to offer greater early intervention and prevention services. 32 assembly members and senators support CCSESA's proposal to do so.<sup>2</sup> To read more about this budget priority, please refer to our fact sheet and attachments.<sup>3</sup>

**3. Expansion of early learning opportunities.**

**\$650 million for Transitional Kindergarten (TK), Full-Day Kindergarten, and preschool facilities**

***Support Legislative Version (Row #1912)***

We support the legislature's proposal to prioritize universal pre-kindergarten (UPK) implementation by adding funding for the TK, Full-Day Kindergarten, and preschool facilities grant. New and modified facilities are urgently needed to implement UPK over the next four years

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2. Letter of Support from Legislature (April 29, 2022), < [https://ccsesa.org/?wpfb\\_dl=8082](https://ccsesa.org/?wpfb_dl=8082)>.

3. Fact sheet and attachments (May 18, 2022),

<[https://drive.google.com/file/d/1\\_bEM7EkdaFDrMiLzLTe3E8cmVqDKkTMA/view?usp=sharing](https://drive.google.com/file/d/1_bEM7EkdaFDrMiLzLTe3E8cmVqDKkTMA/view?usp=sharing)>.



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and this grant's streamlined application process is significantly more responsive to our immediate needs than other school facilities programs.

### **Inclusive Early Education Expansion Program (IEEEP)**

***Request to Modify May Revision and Legislative Version (Row #1761)***

Access to inclusive learning environments is a priority for county superintendents. We support the May Revision's proposal to add new funds to the IEEEP grant. We also request that policy makers consider (1) extending the deadline to spend the first round of IEEEP funds and (2) clarify that LEAs may use the new IEEEP funding for new projects or to help complete projects started with prior IEEEP grants. Building costs have increased by approximately \$200/square foot since the first IEEEP grants were awarded and many original grant recipients have been unable to start or complete projects due to insufficient funds.

#### **4. Serving the whole child within our schools.**

### **California Community Schools Partnership Program (CCSPP) funding, including \$60 million for COE implementation support**

***Support May Revision***

CCSESA appreciates the recognition of the important role that COEs must play to support coordination at the county-level. We commend the \$60 million investment for qualifying COEs to support county-level coordination.

### **\$1.5 billion for CCSPP implementation and program modifications**

***Support May Revision; Reject Legislative Version (Row #1844)***

The CCSPP has the potential to transform schools into "whole child and whole family" hubs of the community, informed by shared decision-making and culturally competent policies. We support the inclusion of the Governor's May Revision to augment CCSPP funding of \$1.5 billion to ensure access to every eligible LEA that opts to apply on behalf of its high-need schools in the coming year. Currently, less than 10% of the eligible LEAs have applied for grant funding and we anticipate there will be a high demand for grant funding in the next round of implementation and planning grant application cycles in the coming school year.

### **Increasing the supply of school-based mental health professionals**

***Support May Revision and Legislative Version (Row #1919)***

We support adding school-based mental health professionals to the Teacher Residency and Golden State Teacher Grants but request that funding also be provided to LEAs for the purpose of meeting supervision requirements. To earn a clear credential or license, behavioral health professionals must obtain up to 3,000 supervised hours, which are subject to greater personnel costs for the supervisor.

### **Expanded Learning Opportunities Program (ELO-P)**

***Support May Revision; Reject Legislative Version (Row #1820)***

CCSESA commends and supports the proposed augmentation of program funding in the May Revision as this amount will provide ample enrichment and wraparound care opportunities for California's low-income students. The legislative budget would approve the amounts in the Governor's Budget, which is lower than the May Revision. We also support the trailer bill language which amends the audit penalties to be proportional, rather than comprehensive, and appreciate that these penalties will not take effect until the 2023-24 school year.

#### ***Support Legislative Version (Row #1820)***

The elements of the legislative budget that we support include (a) addition of \$5 million ongoing funds to support technical assistance; (b) inclusion of the program as a strategy for Differentiated Assistance; and (c) addition of COLA at full implementation.



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### **Request to Modify Legislative Version (Row #1820)**

The legislative proposal would require LEAs to include meals as an ELO-P program requirement. Due to staffing shortages, many of our small, rural, and Frontier sites will not be able to fulfill this requirement. We request that if the provision of meals becomes a program requirement that, similar to all other program requirements, it be fully enforced beginning in 2023-24 and that during the 2022-23 year, the state work closely with expanded learning experts in the field to ensure that all LEAs will have the resources and support needed to provide meals as a program requirement.

### **Reject Legislative Version (Row #1820)**

We oppose the legislative proposal to change the LEA funding based on a tiered system that would fund Tier 1 schools at \$3,000 per unduplicated pupil and Tier 2 schools at \$1,500 per unduplicated pupil. This change would unfairly punish our small, rural, and Frontier schools who are barely able to implement at the current \$2,500 per unduplicated pupil just due to their size and would create an issue of equity based on a child's geographic location. We request the LEA funding formula remain unchanged from May Revision.

### **Special Education Addendum to the LCAP.**

### **Reject May Revision; Support Legislative Version (Row # 1828)**

The May Revision proposes a Special Education Addendum to the Local Control and Accountability Plan (LCAP) intended to support inclusive planning between general and special education. An addendum, however, signals that the needs of students with disabilities are secondary to students without disabilities, that special education is a separate place, and the needs of students with disabilities should continue to be addressed outside of the general education planning process. We request the final budget include students with disabilities in the LCAP process and template to promote a coherent, one-system approach to addressing the persistent inequities facing students with disabilities.

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We thank you for your consideration of our position. To contact CCSESA regarding this letter, please reach out to Derick Lennox ([dlennox@ccsesa.org](mailto:dlennox@ccsesa.org)).

Sincerely,

Derick Lennox  
Senior Director, Governmental Relations and Legal Affairs  
California County Superintendents Educational Services Association

cc: Honorable Anthony Rendon, Assembly Speaker  
Honorable Toni G. Atkins, Senate President pro Tempore  
Members, Assembly Budget Committee  
Members, Senate Committee on Budget and Fiscal Review  
Assembly and Senate Republican Offices of Policy  
Ben Chida, Chief Deputy Cabinet Secretary, Office of Governor Gavin Newsom  
Nichole Munoz-Murillo, Deputy Legislative Secretary, Office of Governor Gavin Newsom  
Brooks Allen, Executive Director, California State Board of Education  
Chris Ferguson, Program Budget Manager, California Department of Finance