



California County Superintendents Educational Services Association

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July 28, 2014

Debra Thacker, Regulations Coordinator

Legal, Audits and Compliance Branch

Administrative Supports and Regulations Adoption Unit

California Department of Education

1430 N Street, Suite 5319

Sacramento, CA 95814

Re: Comments and Recommendations on the Proposed LCFF Regulations and LCAP Template

Dear Ms. Thacker:

On behalf of the California County Superintendents Educational Services Association (CCSESA), representing California's county superintendents of schools, I am writing to provide our comments in response to the **15-Day Notice of Modifications to Text of Proposed Regulations regarding Local Control Funding Formula (LCFF) Spending Requirements for Supplemental and Concentration Grants and the Local Control and Accountability Plan (LCAP) Template.**

Overall the proposed regulations reflect the appropriate balance of accountability and flexibility. Pursuant to state law, the regulations focus on the state priorities and how local education agencies (LEAs) will address each of those priorities. Also pursuant to state law, the regulations allow LEAs the flexibility to match their resources to those priorities without restriction to the traditional categorical designations.

While CCSESA supports the overall proposed regulations, there are important revisions that are necessary to maintain the LCAP's focus on the actions taken and the outcomes achieved.

Comments and Recommendations on the Proposed LCFF Regulations and LCAP Template:

- ***Strongly Recommend*** that the proposed new column "Actual Expenditures" be removed. This column can be found on page 10 under Section 15498 (Local Control and Accountability Plan and Annual Update Template). This column in the Annual Update section of the template will inevitably lead LEAs to try to track LCAP expenditures in their financial systems, and as a result will turn every LCAP action into a de facto categorical program. We know from long experience in California that accounting-based accountability mechanisms have failed, often producing rigid and inflexible educational programs that do not meet the needs of pupils.

A core tenet of LCFF is to give communities the flexibility to decide how to best allocate resources to get results in their local context. LEAs will need that flexibility if they are to succeed in improving educational outcomes for all students. Local flexibility will continue to be critical for LEAs in making changes to their LCAP action plans in response to these varying outcomes, and local communities will demand such changes if progress is not achieved. Turning the LCAP into a complex general ledger tracking exercise will inhibit the

ability of local communities to dynamically adjust programs and priorities to meet the needs of their students.

The Annual Update should be focused on the actions actually undertaken and the outcomes achieved. The "Actual Expenditures" column would compromise the intent of the statute and move the LCAP away from being a catalyst for improved pupil outcomes as a result of the actions/services provided, and closer to an expenditure report of those services.

- **Support** the addition of the proposed section 15495(g) that defines "Required Metric." This addition will help provide clarity for the LEAs when they are determining the different metrics for each of their goals as aligned to the state priorities. This addition will also enhance the review of the LCAPs by the county offices of education, as the "required metric" will be a key component of each LEA's plan.
- **Recommend** that the terminology and verbiage used in proposed section 15498 (LCAP Template) be aligned to the Proposed Regulations for LCFF. Currently there is incoherence between the two that will lead to confusion in the field. An example of this can be found on page seven of the LCAP Template in which question 12 outlines "performance indicators" as opposed to the "required metric" description outlined in the regulations.

Only now are county superintendents reviewing the first round of school district LCAPs. As needed refinements to the new system emerge, there are several mechanisms to address those concerns. First and foremost is the reliance on local accountability. The state can also address concerns through the evaluation rubrics that are to be adopted, through the identification and sharing of best practices by the California Collaborative for Educational Excellence, and ultimately through changes to regulations or law, as necessary.

We urge the State Board of Education to apply the above comments and recommendations to the proposed regulations, which are consistent with state law and support a coherent and innovative approach to school funding and accountability.

Sincerely,



Peter Birdsall, Executive Director
California County Superintendents Educational Services Association (CCSESA)

cc: Members, California State Board of Education
Karen Stapf Walters, Executive Director, California State Board of Education