



October 28, 2016

President Michael Kirst and Board Members
California State Board of Education
1430 N Street, Room #5111
Sacramento, CA 95814

RE: State Board Agenda Item #4 - November 2, 2016

Dear President Kirst and Board Members:

I write regarding agenda Item 4, the Local Control and Accountability Plan Template. While there has been some improvement, major issues remain that we hope the Board will address before the final version for the next cycle is adopted.

LCAP Template Does Not Address Local Infrastructure to Target Achievement Gaps

The LCFF evaluation rubrics and the LCAP template must serve as the infrastructure that the state provides locals to ensure that every student has their constitutional right to an equal opportunity to learn. But the revisions in the LCAP template undermine this critical function. The key “Performance Gaps” box in the Plan Summary inaccurately defines the intolerable achievement gaps we are trying to address and dilutes oversight of equity. “Performance Gaps” in the Plan Summary (page 2 of 23) should not be defined based on a relative measure of large gaps between the outcomes produced by a given LEA for different student groups but rather an absolute measure of which groups are performing below state standards. As proposed, LEAs with overall orange performance would never identify performance gaps to address and could hide significant equity issues for English learners, disadvantaged students, and ethnic minorities.

Moreover, the Department’s recommended approach undermines the Board’s stated goal of a single, unified, coherent system. The “Performance Gaps” box in the LCAP should align with the Equity Report in the Evaluation Rubrics and identify plans for addressing red or orange performance for *any* subgroup. To do otherwise, as currently proposed, will diminish the extent to which subgroups are identified for attention and action.

LCAP Template Does Not Provide Necessary Fiscal Transparency

If this is the only tool that the State provides local leaders to foster meaningful engagement from all stakeholders and improve planning to address the needs of all students, particularly those historically underserved students to whom additional resources are being directed, it needs to include greater transparency about those resources. The revised LCAP template must provide greater transparency around the receipt and use of Supplemental and Concentration grant funds by LEAs. In order for the public to determine if the proportional spending requirement is being honored, the template must promote transparency on use of the grants. And, if an LEA does not expend all of its required Supplemental and Concentration grant funds in a given year, those funds should be carried over in

subsequent years to benefit the same student groups for whom it was intended. The Budget Summary should clearly break down the total projected LCFF funds for the LCAP year between base and total supplemental and concentration funds.

Ensure the LCAP is a Useful, User-Friendly Document for Parents and Educators

While this proposed revision to the template is a modest improvement on the previous unwieldy version, it still appears to be a bureaucratic compliance document. It is the responsibility of the State Board to continue to watch how these tools are used locally, and if they are not useful to all stakeholders and do not improve engagement and programming of resources as measured by evidence of opportunities and outcomes, the State Board has an obligation to direct the Department to go back to the drawing board and make necessary changes.

If you any questions regarding this input, please don't hesitate to contact me directly.

Respectfully,



Bill Lucia
President, EdVoice

cc: Karen Stapf Walters, Executive Director, California State Board of Education
Judy Cias, Chief Counsel, California State Board of Education
Cathy McBride, Deputy Legislative Secretary, Office of Governor Brown
David Sapp, Deputy Policy Director and Assistant Legal Counsel