



# REALIZING THE PROMISE OF LCFF

RECOMMENDATIONS FROM  
THE FIRST TEN YEARS

MARCH 2023

## ACKNOWLEDGMENTS

This report was authored by Alice Li, Nicole Gon Ochi, Karissa Provenza, and Victor Leung. We would like to thank the many staff and interns at Public Advocates and ACLU Southern California who contributed to the research, editing, and publishing of this report, including:

John Affeldt	Yaritza Gonzalez	Lindsey Lopez
Erin Apte	Liz Guillen	Shilpa Ram
Sumeet Bal	Adriana Hardwicke	Kate Walford
Angelica Félix-D'Egidio	Fatema Jaffer	Isaiah Zeavin-Moss
	Angelica Jongco	

## DEDICATION

We dedicate this report to our many partners who organize, educate, and empower their local communities to engage with the LCAP process, including, but not limited to:

- **Building Healthy Communities - Monterey County (BHC - Monterey County)**
- **Californians for Justice (CFJ)**
- **Community Coalition (CoCo)**
- **Congregations Organized for Prophetic Engagement (COPE)**
- **Gente Organizada**
- **Long Beach Education Connection**
- **Parent Organizing Network (PON)**
- **PICO California**
- and our partners in the **LCFF Defend and Mend Coalition and Equity Coalition**

Their work demonstrates that community members can create transformational change through the LCAP and inspires us all to make the promise of LCFF real.

## ABOUT

Public Advocates Inc. is a nonprofit law firm and advocacy organization that challenges the systemic causes of poverty and racial discrimination by strengthening community voices in public policy and achieving tangible legal victories advancing education, housing, transportation equity, and climate justice.

The American Civil Liberties Union of Southern California (ACLU SoCal) works to defend and promote civil liberties and social justice for all Californians. The organization is committed to ensuring that all students receive an excellent education, particularly Black, Indigenous, and disabled students, and other students who traditionally have been marginalized. Specifically, ACLU SoCal performs litigation, legislative advocacy, and policy advocacy to achieve equitable student funding, reform school discipline, and advance racial justice for California youth, among other priorities.



# TABLE OF CONTENTS

- Executive Summary ..... 4**
- Introduction ..... 11**
- How Does LCFF Work? ..... 13**
- Methodology ..... 16**
- Accountability for Equity Requirements ..... 18**
  - Missing Pieces: Incomplete LCAPs ..... 18**
  - Inconsistencies within LCAPs..... 18**
  - Undermining Equity: Problems with Proportionality, Carryover, and Contributing Actions ..... 19**
  - Results of County Review ..... 22**
  - Recommendations ..... 23**
- Comprehensive Strategic Planning: Goal Setting and Achievement Based on the State Priorities ..... 25**
  - A Fraction of the Big Picture: Excluded Programs and Expenditures ..... 26**
  - A Clouded View of the Strategic Plan: Vagueness, Bundling, and School Site Allocations..... 29**
  - Recommendations ..... 34**
- Meaningful Engagement ..... 37**
  - A Floor and Not a Ceiling: Community Engagement Efforts ..... 38**
  - District Implementation of Community Feedback ..... 42**
  - Recommendations ..... 45**
- Conclusion ..... 49**
- Appendix A: Districts ..... 50**
- Appendix B: Carryover ..... 55**
- Appendix C: Community Schools Implementation Grantees ..... 58**
- Endnotes ..... 62**



# EXECUTIVE SUMMARY

Established in 2013, the Local Control Funding Formula (LCFF) is a set of funding reforms that transformed public education in California. Instead of a complex, inefficient, and punitive categorical funding approach, LCFF ushered in a new era of local funding flexibility. In exchange, LCFF established new requirements for transparency, equitable distribution of resources to high-need students, and meaningful engagement with students, families, and communities. Under LCFF, every school district<sup>1</sup> is required to collaborate with their community to create a strategic action and spending plan called the Local Control Accountability Plan (LCAP). The LCAP is designed to be a constantly evolving, comprehensive strategic planning tool that supports collaborative decision-making with communities. It is also intended to serve as a mechanism to hold districts accountable for their equity and engagement obligations.

By establishing a new, more flexible and progressive way to fund schools and support their continuous improvement, the promise of LCFF was to improve student outcomes through greater equity, transparency, local accountability, and meaningful community engagement. Over the past decade, it has fundamentally transformed how public schools are funded and held accountable.<sup>1</sup> However, the potential of the LCAP process to close long-standing opportunity gaps and create a culture of continuous improvement and collaborative decision-making with communities too often remains a promise unfulfilled. Although bright spots exist, by and large, our review of recently approved 2022-2023 LCAPs in 72 districts throughout the state suggests that significant innovation is needed to strengthen the LCAP as a tool for comprehensive strategic planning, engagement, and accountability.<sup>2</sup>

## ACCOUNTABILITY FOR EQUITY REQUIREMENTS

School districts must adopt LCAPs by July 1 to submit to county offices of education. However, districts frequently produced incomplete, inconsistent, and non-compliant LCAPs by the deadline, thereby undermining districts' equity obligations.

- 39 of 72 districts posted either an incomplete LCAP or no LCAP at all by the deadline.
- Only one district had completely consistent figures across all sections.
- Three districts reported discrepancies greater than \$10 million in their total funding for high-need students between their Budget Overview for Parents and their Action Tables.

To promote equity, districts must increase or improve services for low-income students, English learners, and foster youth<sup>3</sup> in proportion to the amount of additional funding (supplemental and concentration funding) they receive. Districts should use all of these funds in the year they received them, and any unspent supplemental and concentration funding must be carried over to the next year and remain committed to high-need students. However, many districts' LCAPs fell short of meeting their obligations to high-need students.

<sup>1</sup> LCFF governs school districts, county offices of education, and charter schools, which are collectively known as local education agencies (LEAs). To simplify, we refer to LEAs as "districts" throughout.

<sup>2</sup> Some analyses included all 72 districts, while others included a smaller subset.

<sup>3</sup> Low-income students, English learners, and foster youth are collectively labeled "unduplicated" students under LCFF. We will refer to these three student groups together as "high-need students" throughout this report.

**Example:** District X has 10,000 students. Of these students, 60% are high-need (low-income, English learner, and foster youth). In year YYYY, the base grant amount is \$8,000.

**The Formula**

<b>Concentration</b>
<b>Supplemental</b>
<b>Base</b>

40% of the students are not high-need. These 4,000 students each generate **base funding**.



**Non-high-need student**  
Base grant only (\$8,000)  
=\$8,000/student

60% of the students are high-need. These 6,000 students each generate **base funding** and **supplemental funding**. The district has 5% more high-need students than the 55% threshold. These 500 students each generate additional **concentration funding**.



**High-need student up to 55%**  
Base grant (\$8,000)  
+20% Supplemental Grant (\$1,600)  
=\$9,600/student



**High-need student over 55%**  
Base grant (\$8,000)  
+20% Supplemental Grant (\$1,600)  
+50% Concentration Grant (\$4,000)  
=\$13,600/student

- 23% budgeted less funding for services for high-need students than the amount of funding they received to support those students, thus failing to meet their equity obligations. After factoring in carryover obligations, more than 40% failed to meet their equity obligations.
- 52% failed to utilize all of their funding for high-need students and needed to carry funds over to the next year. 16 districts carried over more than \$5 million.
- Many districts improperly categorized services for all students as services for high-need students, resulting in high-need students losing out on critical directed services.
- Less than 20% of districts clearly explained how they used their concentration add-on grant funding, a new funding source designed to increase staffing levels at high-need schools.

County offices of education (COEs) review all district LCAPs after July 1 and have a duty to intervene if LCAPs are incomplete, inaccurate, or violate the law. However, County reviews failed to fix many of the problems we identified.

- After COE review, 24 of 72 districts still had incomplete LCAPs.
- Similarly, all 72 district LCAPs had inconsistencies in the figures reported by the different LCAP sections. Even the one LCAP that was completely consistent prior to COE review was revised to include inconsistencies. In some cases, discrepancies were greater than \$30 million.
- COEs approved LCAPs with contributing actions that did not actually increase or improve services for high-need students and/or allowed districts to arbitrarily inflate expenditures of contributing actions to meet proportionality on paper only.

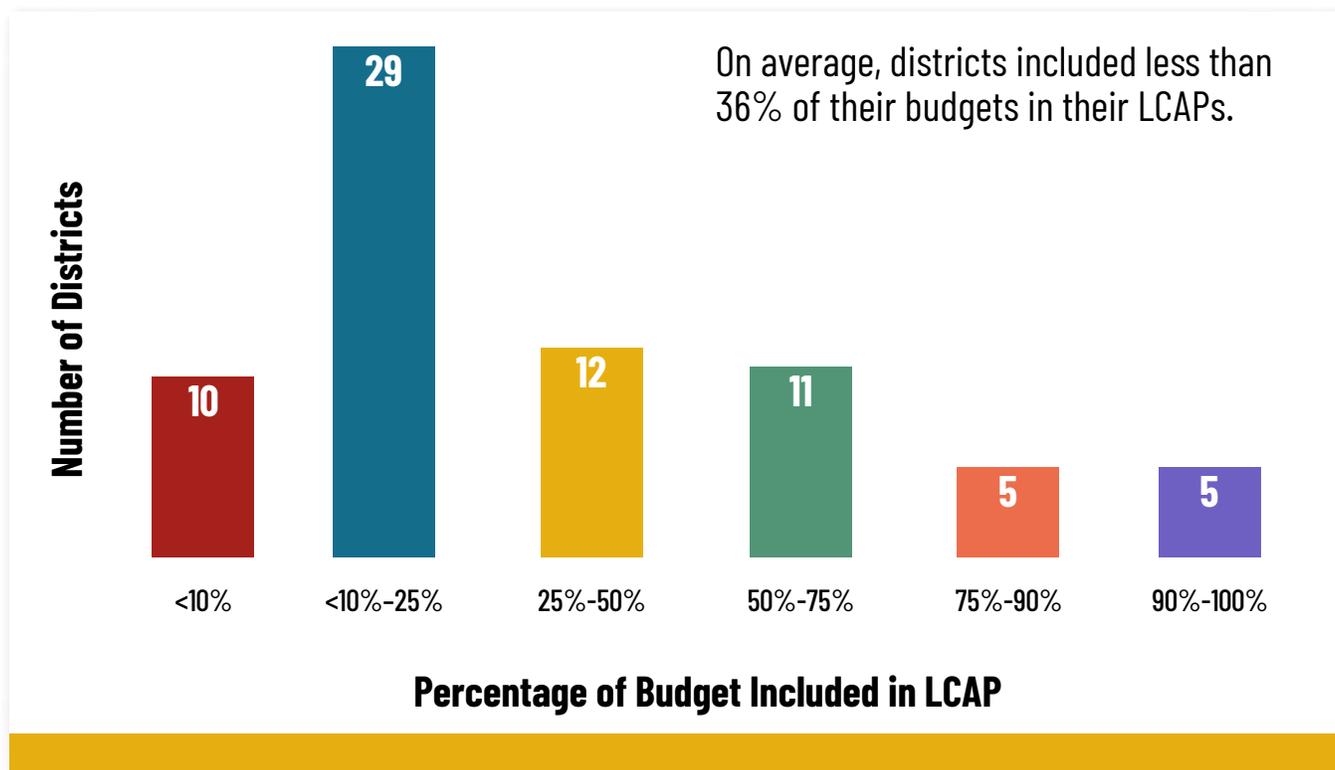


## RECOMMENDATIONS FOR STATE ACTION

- Mandate the use of an electronic LCAP template that 1) automatically populates information to address consistency issues, 2) tracks changes between LCAP drafts, and 3) prevents submission of LCAPs that are incomplete or do not demonstrate proportionality.
- Increase support for and regularly audit COEs to evaluate whether they are fulfilling their review, support, and accountability duties under LCFF; increase oversight for COEs that routinely approve inadequate LCAPs.
- If a district is found to have not met their equity obligation – through UCP complaints, audits, or other means – require them to amend their current LCAP to account for any shortfalls retroactively discovered.

## COMPREHENSIVE STRATEGIC PLANNING

We found that most districts exclude significant programs and expenditures from their LCAPs, include only a fraction of their budgets, and fail to describe actions – including discretionary school site allocations – with enough detail for communities to understand what districts are doing or monitor whether programs and services are implemented and effective.<sup>11</sup>





- 51 districts (71%) included less than 50% of their budget in the LCAP.
- Less than half of the districts that received a California Community School Partnership Program implementation grant mentioned community schools in their LCAP.
- Many of the largest districts in California omitted billions of dollars of COVID relief funding from their LCAP.

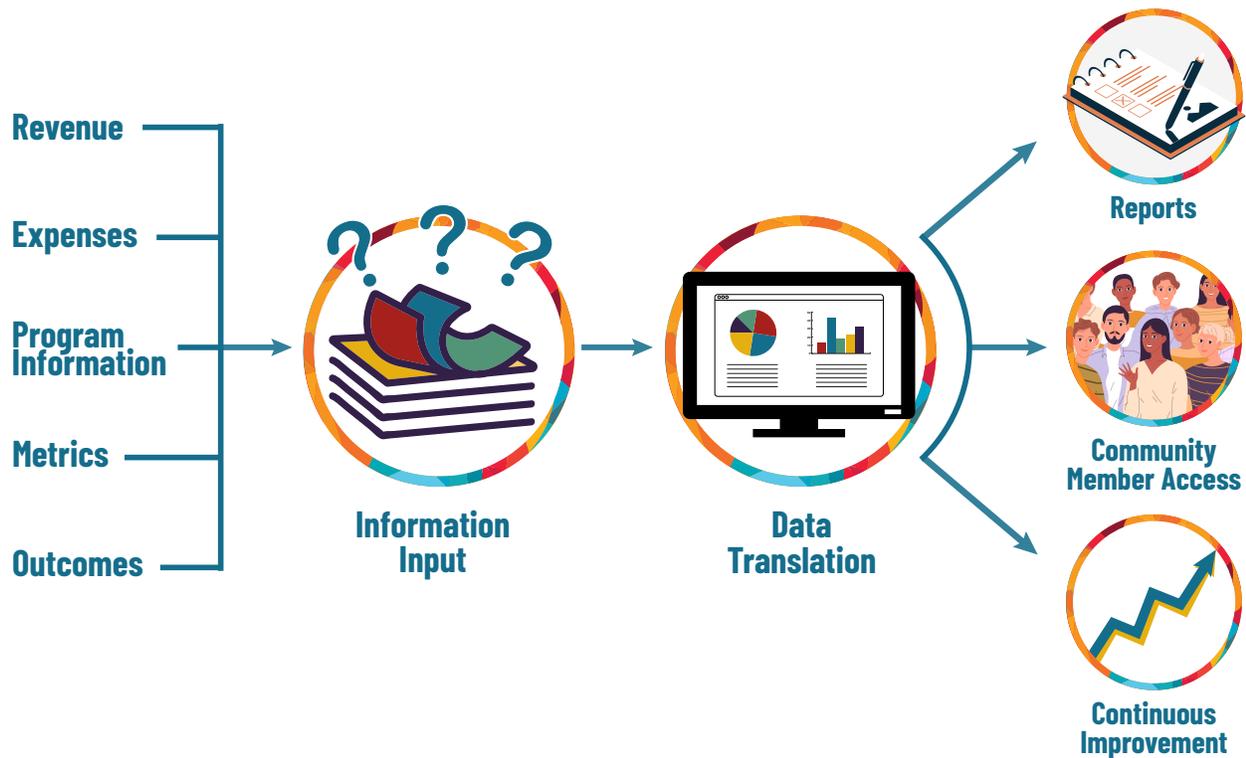
In addition to excluding key programs and services from their LCAPs, districts often provided inadequate descriptions of the programs and services that they *did* include. Descriptions were often so vague or general (bundling together a host of different programs) that it was impossible to understand what districts were doing, why they were doing it, or how specific programs and services were moving them toward their equity goals. These types of blanket services – like “additional support services for students” that cover everything from bus drivers to library technicians – obscure vital information from community members around funding, implementation, and results.

Similarly, two-thirds of the district LCAPs we reviewed in-depth included at least one fully discretionary school site action involving supplemental and concentration funds, meaning that the district provided these funds to school sites to spend however the site administrators chose. Such allocations, however, remain subject to LCFF legal requirements that they be used to increase or improve services for high-need pupils. Yet districts typically did not provide any description in their LCAPs about how these funds were spent or any other indication that they are directed towards high-need students. While more local control of LCFF funding at the site level is crucial, such flexibility must be accompanied by transparency so that COEs and the public can ensure that the legal requirements are met and, more generally, so that they can understand, impact, and monitor the effectiveness of school funding decisions.

## RECOMMENDATIONS FOR STATE ACTION

- Require districts to include in the LCAP all actions and expenditures that are designed to make progress on LCAP goals, regardless of funding source, including Expanded Learning Opportunities Program allocations, Learning Recovery Emergency Block Grant funds, Educator Effectiveness funds, and California Community Schools Partnership Program grant funds.
- Provide clear guidance and support to districts on creating and describing specific actions (as opposed to vague or bundled actions) and empower county offices of education to reject LCAPs that do not meet this standard.
- Require districts to align School Plan for Student Achievement (SPSA) templates with their LCAP, post SPSAs on districts’ LCAP webpages, and instruct schools to include any school site discretionary funding (regardless of funding source) in their SPSAs. Add a provision to the LCAP that requires districts to explain their methodology for allocating school site discretionary funds and how these funds will meet the legal requirements for uses of supplemental and concentration funding, including engagement at the site level.
- Invest in an innovative, web-based comprehensive planning platform (beyond the current “back-end” electronic LCAP template for districts) that integrates LCAP and other budgetary information with data, visual aids, and sorting, filtering, and comparison features.

## COMPREHENSIVE ONLINE STRATEGIC PLANNING PLATFORM



## MEANINGFUL COMMUNITY ENGAGEMENT AND DECISION-MAKING

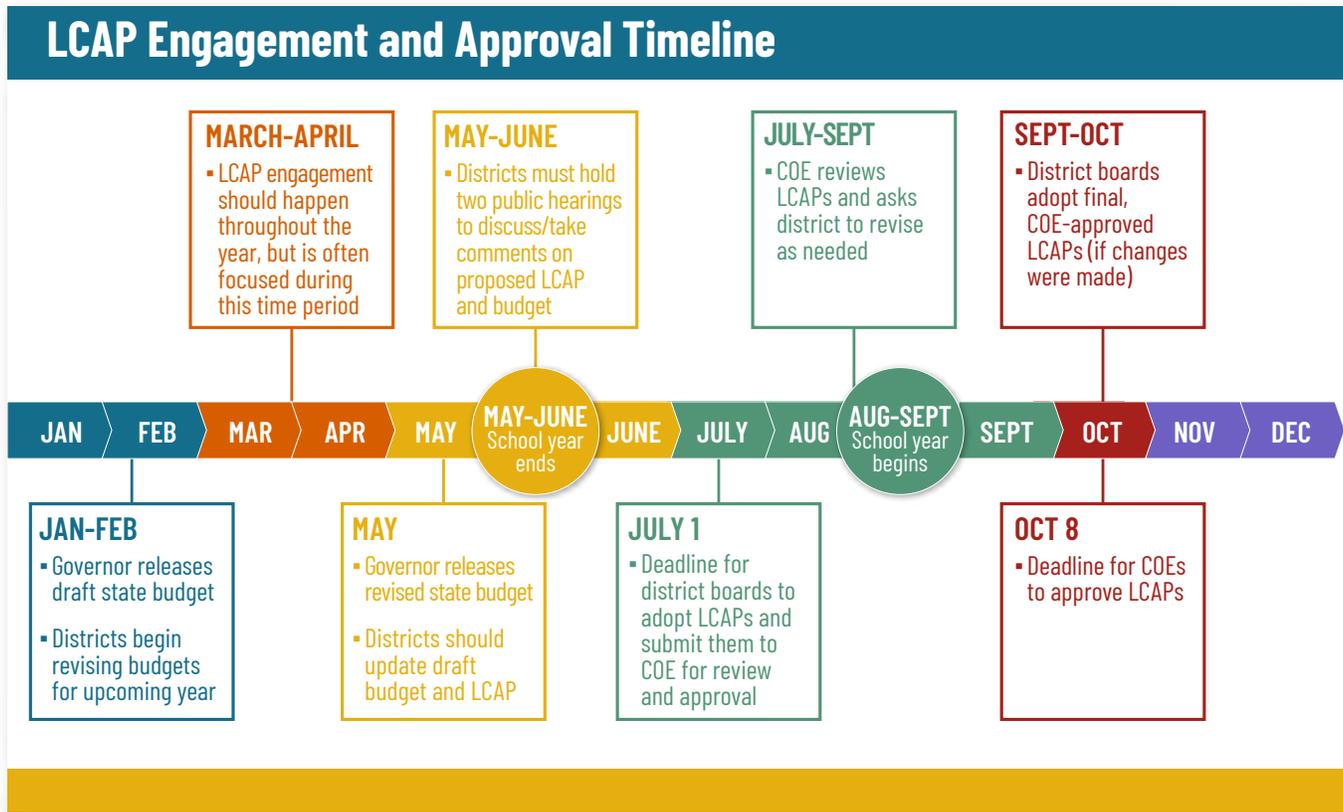
Effective community engagement and shared decision-making are cornerstones of LCFF’s enhanced local control. Still, many districts are failing to engage students and families in an inclusive and authentic manner, and communities across the state are still calling for more accessible and meaningful engagement. Eighty-five percent (85%) of districts we reviewed in-depth received feedback that engagement was not accessible enough.

LCFF requires districts to convene a Parent Advisory Committee and, if the district has a certain number of English learners, a District English Learner Advisory Committee. However, only 40% of districts mentioned presenting the LCAP to the required parent committees, and only 25% of districts mentioned providing responses to parent committee feedback as required by law.

In addition to those two parent committees, districts may form additional advisory committees that reflect community needs. However, few districts took that extra step to perform targeted outreach to traditionally marginalized or hard-to-reach communities.

- Only 25% of districts mentioned engagement with a Black advisory committee, and only 45% mentioned engagement focused on racial justice.
- Only 10% created advisory groups focused on foster youth and/or unhoused students.

LCFF also requires consultation with students, but 40% of districts performed only the bare minimum for student consultation, seeking feedback solely through surveys without pursuing further dialogue or offering other opportunities for engagement.



Districts must conduct two public hearings to introduce and then approve the LCAP. LCAPs are complex documents that can be hundreds of pages, but districts failed to provide community members (and likely their own board members) with adequate time to review the drafts and provided even less time for districts to digest and incorporate community suggestions.

- 90% of districts did not hold a first hearing until June.
- 36% of districts adopted the LCAP a week or less after the first public hearing, and 10% held public hearings only one or two days apart, providing essentially no opportunity for districts to incorporate any input received during the first hearing.

In the LCAP itself, districts are required to share a summary of the feedback they received through the LCAP engagement process. However, many districts lumped together all the feedback they received, selectively chose feedback to highlight, and/or failed to incorporate the feedback into their LCAPs. In some cases, districts decreased funding in areas prioritized by the community or simply failed to show whether concrete suggestions had been implemented.

## THEMES FROM COMMUNITY INPUT ACROSS THE STATE



### Mental Health and Social Emotional Health Resources

Psychologists  
Counselors  
On-Campus Mental Health Services  
Trauma-Informed Practices  
Race-Based Trauma Support



### Well-Rounded Educational Opportunities

Arts Education  
Music  
Field Trips  
Ethnic Studies Classes  
Sports  
Science Camps



### Academic Support for Black Students and English Learners

College Preparedness Resources  
Intervention Programs  
Mentors  
Tutors



### School Climate and Reimagining Safety

Bullying Prevention  
Restorative Justice  
Culturally Relevant Training  
Improving Crisis Response Protocols

## RECOMMENDATIONS FOR STATE AND LOCAL ACTION

- Amend the LCAP engagement timeline to allow more time for community and board members to review and provide input. Specifically, require districts to publish a draft LCAP by the end of April and hold their first public hearing before the governor's May Revise budget proposal. Further, require districts to publish a revised draft LCAP in June that incorporates feedback provided at the public hearing and updated state budget estimates, and then adopt the LCAP at the next public meeting no less than two weeks after the first hearing. Require districts to engage educational partners on how to prioritize spending if there are significant changes to budget assumptions after the LCAP is adopted.
- Districts should invest in building their capacity to meaningfully engage with students and families by 1) participating in the Community Engagement Initiative, 2) investing more resources in community engagement, including specialized staff and trainings for students, families, and staff at the site level, and 3) implementing research-based practices to improve dialogue between the district and community members.
- The state should improve accountability over districts' engagement efforts by updating the LCAP engagement prompts, integrating meaningful engagement into differentiated assistance support, establishing uniform data on engagement, and empowering county offices of education to monitor engagement requirements.

# INTRODUCTION

**B**efore 2013, California maintained an extremely complicated school funding system. Districts received funding for specific, restricted purposes through more than 100 different funding streams. The system made it difficult for districts to have enough flexibility to address unique local needs and failed to address districts' varying levels of student need. It also made it impossible for students, families, school staff, and other community members to understand or give input on highly-restricted district budgets and budget decisions.



ACLU SoCal

In 2013, after nearly a decade of organizing, students, families, and advocates successfully worked with the state to pass the LCFF, which now governs how most of California's public schools are funded.<sup>11</sup> LCFF gave districts the flexibility to decide how they would spend their funding, with two guiding principles:

- Spending decisions must be made in partnership with community members, who are invested in and critical to student success.
- Spending decisions must be designed to address systemic and continuing inequities that create barriers to student success, including, but not limited to, increasing/improving services to high-need students.

LCFF transformed how public schools are funded *and* how they are held accountable. The prior accountability system included a "test and punish" approach that measured student success solely through standardized testing scores and penalized schools accordingly. In a marked departure from that system, LCFF provides school districts not only with funding flexibility in exchange for equity and community accountability but also broadens the measurements of student and school success to include evaluations of conditions beyond test scores, including school climate and engagement.

The vision of LCFF was threefold:

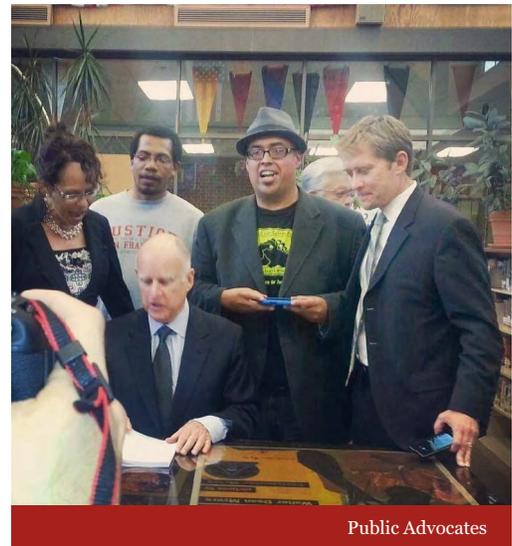
- 1. Equity:** providing more funding for students who need it most.
- 2. Multiple Measures:** understanding student success as more than just test scores.
- 3. Meaningful Engagement:** making local spending decisions in partnership with students, families, educators, and other community members.

To realize this vision, LCFF created the LCAP development and approval process.

### **THE LCAP PROCESS WAS MEANT TO ENSURE THREE THINGS:<sup>iv</sup>**

- 1. Accountability with LCFF Equity Requirements.**
- 2. Goal-Setting and Multiple Measures Achievement Based on State Priority Areas.**
- 3. Shared Decision-making with Communities through Meaningful Engagement.**

It has been 10 years since California started using LCFF to allocate the bulk of state funding for K-12 education. Much has changed over the past decade, both in the education funding landscape and world at large. A global pandemic continues to ravage communities, disrupt schools, and exacerbate societal inequities. We continue to confront the deep racial injustices that pervade our education system and society, and schools have begun making greater efforts to address those issues. These shifts have inspired federal and state governments to make historic investments in education, including increases to LCFF, pandemic relief funding, community schools grants, and other new programmatic funding.<sup>v</sup> The state has also continued to amend the LCAP template to reflect the evolving need for transparency and accountability. Given all of these shifts and the 10-year anniversary of LCFF, it is an opportune time to examine the impact of the LCAP process thus far and how the process might be improved to more fully realize the promise of LCFF.<sup>vi</sup>



# HOW DOES LCFF WORK?

At the heart of LCFF is a commitment to equity. Under LCFF, districts receive three types of grants: base, supplemental, and concentration grants. Base grants are a fixed amount of money that school districts receive for each student enrolled in their schools based on grade level. Because students with greater needs require more resources, LCFF also provides additional supplemental and concentration grants to support certain groups of high-need students. Although many groups of students could be considered “high-need,” the law specifically grants additional funding for three high-need student groups: students who are low-income, English learners, and foster youth. For each student who falls into one or more of these categories, school districts receive an additional “supplemental grant,” and districts with 55% or more high-need students also receive “concentration grants.” Beginning in 2021-2022, concentrated districts also receive “concentration add-on” funding to increase staffing at schools with 55% or more high-need students.

Districts must increase or improve services for high-need students in proportion to the amount of supplemental and concentration grants that they receive. These services must be designed to meet the particular needs of low-income students, English learners, and/or foster youth. This equity obligation, or “proportionality” requirement, can be fulfilled entirely quantitatively (by budgeting an amount equal to or greater than the amount of LCFF supplemental and concentration funds received for programs and services that are principally directed and effective toward high-need students). Alternatively, the proportionality requirement can be met through a mixture of quantitative and qualitative improvements (by increasing or improving services for high-need students in an amount equal to or greater than the proportion of a district’s total LCFF allocation comprising supplemental and concentration grants).<sup>vii</sup> Districts are required to identify services that count toward meeting this obligation as “contributing actions” in their LCAPs.<sup>viii</sup> Additionally, if a district has any unspent supplemental and/or concentration funds at the end of a school year, those funds must be rolled over to the following year as part of the district’s proportionality requirement.<sup>ix</sup>

**Example:** District X has 10,000 students. Of these students, 60% are high-need (low-income, English learner, and foster youth). In year YYYY, the base grant amount is \$8,000.

## The Formula

Concentration
Supplemental
Base

40% of the students are not high-need. These 4,000 students each generate **base funding**.



**Non-high-need student**  
Base grant only (\$8,000)  
=\$8,000/student

60% of the students are high-need. These 6,000 students each generate **base funding** and **supplemental funding**. The district has 5% more high-need students than the 55% threshold. These 500 students each generate additional **concentration funding**.



**High-need student up to 55%**  
Base grant (\$8,000)  
+20% Supplemental Grant (\$1,600)  
=\$9,600/student



**High-need student over 55%**  
Base grant (\$8,000)  
+20% Supplemental Grant (\$1,600)  
+50% Concentration Grant (\$4,000)  
=\$13,600/student



## WHAT ABOUT BLACK STUDENTS?

**B**lack students are not one of the three identified high-need LCFF student groups, in part because Proposition 209 precludes using race or ethnicity as a criterion in state public education programs. Some school districts have interpreted the omission of racial subgroups from LCFF as a prohibition on convening race-focused committees or creating goals or actions for students that address gaps in opportunities and outcomes experienced by Black students or other historically marginalized racial groups. This is a misconception. California law requires LCAPs to include goals for all students and numerically significant student subgroups, including racial and ethnic subgroups, and to address racial disparities in educational outcomes.<sup>xi</sup> Therefore, it is not only permissible but essential to address racial disparities in the LCAP, which can mean creating targeted goals, actions, and services. It also means that districts should be actively creating engagement opportunities for Black students and their families when developing strategies to address opportunity gaps experienced by Black students. Many districts, including Long Beach Unified School District, Oakland Unified School District, Sacramento City Unified School District, San Bernardino City Unified School District, and West Contra Costa Unified School District, have intentionally convened committees comprising Black parents to provide more meaningful opportunities to give input during the community engagement process. Other districts, such as Los Angeles Unified School District, have created initiatives like the Black Student Achievement Plan, to attempt to make progress toward closing opportunity gaps. All districts are obligated to redress racial disparities in opportunities and outcomes that exist within their midst. Particularly, where racial subgroups are among the lowest-performing in a district or school and such disparities have been long-standing, it is imperative that districts undertake new more focused goals, actions, and funding to redress those harms.

Recognizing the invaluable role that students, families, and other community members play in both identifying needs and investing in solutions, LCFF also created accountability for the shared decision-making now required in districts' use of their new local flexibility. School districts must create and update an LCAP each year to share their goals, their planned budget investments in staff, programs, or services to meet these goals (known as "actions"), and their progress toward achieving these goals. To develop these LCAPs, districts must engage their communities to understand their unique concerns. At a minimum, districts must "consult with teachers, principals, administrators, other school personnel, local bargaining units of the school district, parents, and pupils" in developing their LCAPs.<sup>x</sup> In addition, all districts must have a Parent Advisory Committee (PAC) to review and give feedback on their LCAP; districts with 15% or more English learner students must establish a District English Learner Advisory Committee (DELAC) to do the same.<sup>xi</sup> Although student engagement may differ among



Public Advocates

districts, all districts must also develop a process for students to review and comment on their LCAPs.<sup>4</sup> These community engagement processes and feedback must be documented in district LCAPs. Additionally, district boards must hold at least two separate public hearings to allow community feedback on the LCAP, one to present a proposed LCAP and the second to vote on the adoption of the LCAP.<sup>xiii</sup> These engagement requirements are designed to create greater communication, accountability, and transparency between districts and their community members.

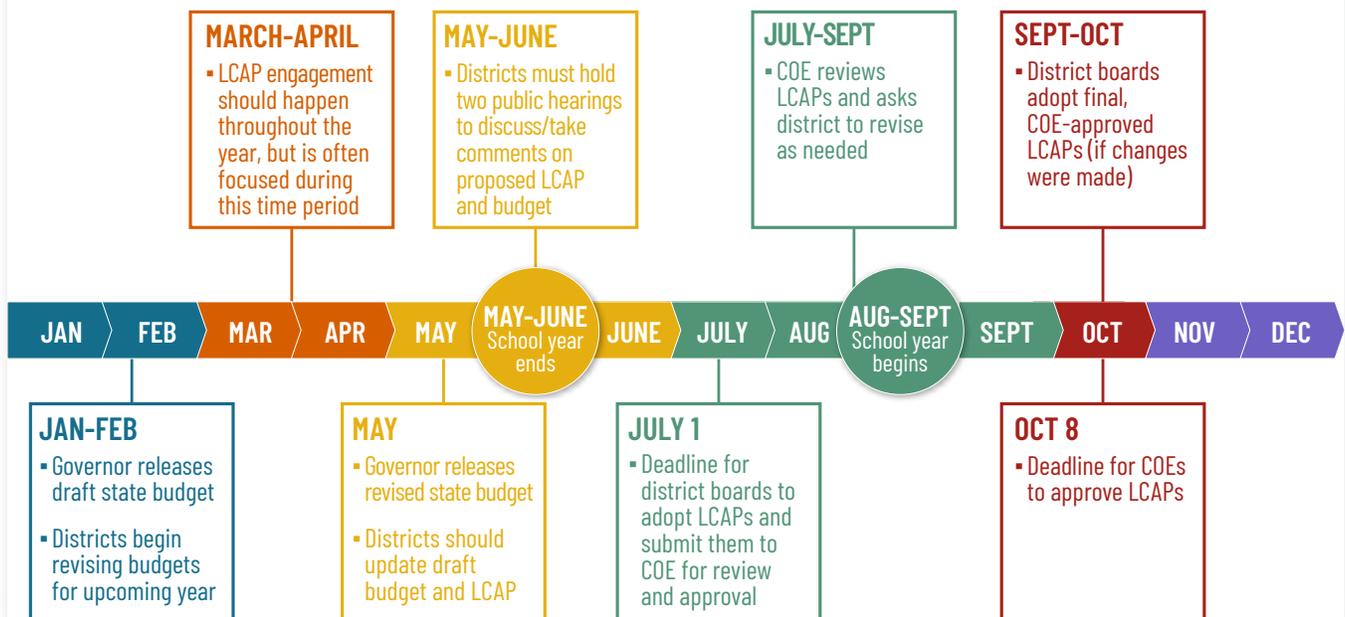
<sup>4</sup> Cal. Educ. Code § 52063 (2019) (amended 2022). S.B. 997 recently strengthened student input in the LCAP process. Beginning July 1, 2024, school districts serving middle school or high school students must include at least 2 students as full members of the parent advisory committee or establish a separate student advisory committee. School districts must make a particular effort to reach out to at-risk or disadvantaged students to serve in an advisory capacity. See Ch. 922, S.B. No. 997, 2021-22 Reg. Sess. (Cal. 2022).

# METHODOLOGY

For this analysis, we reviewed 2022-2023 LCAPs in 72 school districts across California.<sup>5</sup> Initially, we chose 20 districts based on current and historical advocacy in which we and/or our grassroots community partners were engaged. We also considered geographic diversity – spanning northern, central, and southern California and including both urban and rural districts – and district size – including small, medium, and large districts. Later, our review expanded to include all of the districts in two particular counties: Monterey County (24 districts total, 20 of which had not been included in the original 20) and San Bernardino County (33 districts total, 32 of which had not been included in the original 20).

The LCAP approval process has two major checkpoints. First, district boards must approve and adopt what they view as their complete LCAP by July 1 of each year.<sup>xiv</sup> This district board-approved LCAP is then submitted to COEs, which must work with districts to address any issues before granting final approval by October 8.<sup>xv</sup>

## LCAP Engagement and Approval Timeline



The first section of this report, [Accountability for Equity Requirements](#), is based on an analysis of LCAPs in the full 72 districts at two different points: after district board adoption and after final COE approval. Unless otherwise noted, the second and third sections, [Comprehensive Strategic Planning: Goal Setting and Achievement Based on the State Priorities](#) and [Meaningful Engagement](#), are based on an in-depth review of 20 of the 72 LCAPs after COE approval. We chose these 20 LCAPs for closer examination based on geographic, size, and demographic diversity, and also prioritized districts for

<sup>5</sup> See [Appendix A](#) for the full list of districts.



in-depth review where we and our partners are actively working on LCAP implementation. More detailed descriptions of our evaluation process can be found in each respective section.

In the districts where we and our partners were actively working, we reviewed multiple LCAP drafts and engaged directly with districts before, around, and after the board adoption deadline to raise concerns and point out deficiencies. We also communicated with both the Monterey County Office of Education and the San Bernardino County Office of Education prior to the October approval deadline to advocate for oversight and support around remaining issues in board-adopted LCAPs in those counties. However, the fact that these issues persist *despite* our interventions demonstrates greater systemic challenges.

# ACCOUNTABILITY FOR EQUITY REQUIREMENTS

## MISSING PIECES: INCOMPLETE LCAPS

For all intents and purposes, the LCAP approved by district boards operates as final, even if it may change after COE review. Districts hire and prepare for the school year based on the budgets outlined in their district-board approved LCAPs. These LCAPs are usually also the last version that community members can review and give feedback on during a public hearing.<sup>6</sup> Therefore, it is critical that the LCAPs adopted by district boards are complete, accurate, and reflect districts' best efforts to close equity gaps.

Our review began with 72 school districts across California. We looked at each district's website – including the district homepage, any LCAP-related webpages, and district board agendas – to try to locate their 2022-2023 LCAPs. Ideally, districts should post drafts of their LCAPs throughout the development and approval process so that community members can easily access them, but at a minimum, they are required by law to post their LCAPs “prominently...on the homepage” of their websites after the plans are adopted by district boards.<sup>xvi</sup>

We checked district websites multiple times after the July 1 deadline for districts to adopt their LCAPs but found missing or incomplete LCAPs in many districts. Out of 72 districts, 39 either did not post their LCAPs online at all or posted incomplete LCAPs after district board approval.

**OUT OF 72 DISTRICTS, 39 (MORE THAN HALF) EITHER DID NOT POST THEIR LCAPS ONLINE AT ALL OR POSTED INCOMPLETE LCAPS AFTER DISTRICT BOARD APPROVAL.**

- Five districts out of 72 did not post their LCAPs online at all; we were unable to do any further analysis of those districts.<sup>xvii</sup>
- Of the remaining 67 districts, three did not post their Budget Overview for Parents, making it impossible to understand the total budget in those districts.<sup>xviii</sup>
- 18 districts out of 67 had incomplete or missing expenditure tables, including 11 that had incomplete carryover tables.
- 18 out of 67 had incomplete concentration add-on grant information (amounts, descriptions, and staff-to-student ratios).

Additionally, of the districts that posted their LCAPs online, only 37 of 67 districts (55%) clearly posted their LCAPs on their homepages or on their dedicated LCAP webpages. The remaining 45% of districts only posted their LCAPs in district board meeting agendas. As such, community members lacked access to LCAP drafts until meeting agendas were posted – and even then, the documents were buried in agenda portals and archives, making it difficult for community members to find them both during and after the public hearing process.

<sup>6</sup> If a COE requests changes to a district's LCAP before granting approval, the district is required to share that information at a public meeting. Cal. Educ. Code § 52070(c)(2021). However, in practice, these revisions are often glossed over in public hearings and sometimes not mentioned at all. We discuss these transparency issues further under [Public Hearings](#).

## INCONSISTENCIES WITHIN LCAPS

We also found multiple substantive inconsistencies in district board-approved LCAPs, particularly between Budget Overviews for Parents and Action Tables. The purpose of the Budget Overview for Parents is to make district budget information accessible to families and other community members. It is the only place in the LCAP that includes information about a district’s entire budget – encompassing revenue and expenses that are not detailed in the rest of the LCAP.<sup>xx</sup> Action Tables are meant to complement the Budget Overview for Parents by providing a detailed breakdown of the revenue and expenses that *are* included in the LCAP. When these sections contradict each other, the inconsistencies cause confusion for everyone involved in the LCAP process and make community-based accountability nearly impossible.

- Only one of the 64 districts had completely consistent numbers across their Budget Overview for Parents and their Action Tables.<sup>xx</sup>
- Three districts reported total supplemental and concentration funding amounts that had greater than \$10 million discrepancies between their Budget Overview for Parents and their Action Tables.

**ONLY ONE DISTRICT HAD COMPLETELY CONSISTENT NUMBERS ACROSS THEIR BUDGET OVERVIEW FOR PARENTS AND THEIR ACTION TABLES.**

In addition, eight out of 20 districts that we reviewed closely had inconsistencies between their Goals and Actions section and Action Tables in terms of the services they are purportedly directing towards high-need students.

All of these inconsistencies within the LCAP undermine public trust in the accuracy of any of these documents and make it impossible to track whether districts are meeting their equity obligations.

## UNDERMINING EQUITY: PROBLEMS WITH PROPORTIONALITY, CARRYOVER, AND CONTRIBUTING ACTIONS

Districts must increase or improve services for high-need students in proportion to the additional supplemental and concentration funding they receive; any unspent funds for high-need students must be carried over to the next year and remain committed to high-need students. This concept, also called “proportionality,” is the heart of LCFF’s commitment to equity. Each district’s proportionality requirement for the 2022-2023 school year includes not only their supplemental and concentration grants for 2022-2023, but also any “carryover” supplemental and concentration grants they may have retained from 2021-2022.<sup>7</sup>



Public Advocates

<sup>7</sup> Although this “carryover” requirement always existed, 2022-2023 was the first year that districts were specifically required to document the amount of unspent funds in their LCAP. See Cal. Educ. Code § 42238.07 (2013); 2022-2023 LCAP Template Instructions at 12-13.



## PROPORTIONALITY AND CARRYOVER

Our analysis of districts’ proportionality obligations continued to be clouded by the incompleteness and inconsistency issues outlined previously. Additionally, several districts reported incorrect or inconsistent amounts of carryover funds. These challenges made it impossible to evaluate proportionality accurately. However, based on the information provided,<sup>8</sup> we concluded the following:

### **41% OF THE LCAPS APPROVED BY DISTRICT BOARDS DID NOT MEET PROPORTIONALITY REQUIREMENTS**

---

- 15 out of 66 districts (23%) budgeted less funding for contributing actions than they expected to receive in supplemental and concentration grants for the 2022-2023 school year.
- 32 out of 61 districts (52%) reported carryover, and in 16 of those districts, the carryover exceeded \$5 million,<sup>9</sup> which demonstrates a substantial and troubling failure to implement equitable investments in a timely manner.
- After factoring in carryover obligations, a total of 27 districts out of 66 did not budget enough funding for contributing actions to meet their total equity obligation – that is to say, 41% of the LCAPs approved by district boards did not meet proportionality requirements.
- In the district with the highest proportionality shortfall percentage,<sup>xxi</sup> the shortfall was slightly more than 63%, meaning that the district met less than 40% of their equity obligation.
- In the district with the biggest dollar amount shortfall,<sup>xxii</sup> the district failed to account for almost \$40 million of money earmarked for high-need students.

## IMPROPER CONTRIBUTING ACTIONS

Moreover, we found that districts improperly categorized general services and staff as contributing to their obligations to high-need students. For example, Salinas City Elementary School District counted \$1.4 million in school maintenance/custodial/machine operator hours and positions as contributing to proportionality.<sup>xxiii</sup> However, the district did not identify a specific need that high-need students have for these services (as opposed to the general student population). They also did not articulate a targeted distribution of these services to high-need students or schools. As such, these services seem to be both across-the-board – that is, provided to all students and schools without consideration of the specific needs of low-income students, English learners, and/or foster youth – and fundamental to the district’s basic day-to-day operations. Similarly, King City Union School District counted \$10.7 million for “provid[ing a] high quality base program for all students” as contributing.<sup>xxiv</sup> This action also described across-the-board services that did not identify specific needs for high-need students or a targeted distribution of services or staff to high-need students or schools. Absent compelling justification, actions like these cannot and should not be counted towards districts’ equity obligations, since they are integral to providing basic education for all students but are not designed to improve outcomes specifically for high-need students.

<sup>8</sup> We based all calculations on the data provided in each district’s Action Tables unless data were missing or clearly inaccurate.

<sup>9</sup> See [Appendix B](#) for more information on reported carryover.

## CONCENTRATION GRANT ADD-ON FUNDING

Starting in 2022-2023, districts with high-need student populations of more than 55% also received additional concentration grant add-on funding to support staffing at high-concentration schools (where high-need students make up more than 55% of the student population). The LCAP requires districts to identify whether or not they are receiving a concentration add-on grant, how much they expect to receive, how they plan to use the money to increase or retain staff at high-concentration schools, and what the student-to-staff ratios will be at high-concentration schools as compared to non-concentrated schools.<sup>xxv</sup>



Public Advocates

Despite these requirements, it was difficult to track how school districts spent these millions of dollars of additional funding. Out of 67 districts, 54 received additional concentration funds for high-need students. Only 10 of the districts – less than 20% – clearly explained how they were using the funds.

**LESS THAN 20% OF DISTRICTS CLEARLY EXPLAINED HOW THEY USED THEIR CONCENTRATION ADD-ON GRANT FUNDING.**

In addition, we saw myriad issues with the information that districts did provide. Some districts planned to use concentration add-on funding on staff that were not included in any LCAP actions. Anaheim Union High School District, for example, planned to use concentration grant add-on funding for custodians, facilities workers, and bilingual office staff, all of whom were not part of any LCAP actions.<sup>xxvi</sup> Other districts did not account for all of their concentration grant add-on funding. For example, in San Bernardino City Unified School District, concentration grant add-on funding was allocated only to class size reduction staff, which left at least \$2 million of funding unaccounted for in 2022-23.<sup>xxvii</sup> These issues make it difficult to ensure that districts are actually using concentration grant add-on funding to put more staff in the schools that need them most.



## RESULTS OF COUNTY REVIEW

In October, after COEs approved all district LCAPs, we attempted to review each district’s final LCAP. While many of the basic completeness and consistency issues were addressed by COE review (potentially due to our direct intervention), some issues remained.

Three COEs did not post final approved LCAPs on their websites, and 26 out of 72 districts did not post their final, COE-approved LCAP on their district homepages or LCAP webpages,<sup>10</sup> making it difficult to locate and confirm final versions of LCAPs.<sup>11</sup>

Out of 72 districts:

- 24 districts still had incomplete expenditure tables and/or concentration grant information.
- Four districts calculated carryover incorrectly or reported inconsistent amounts of carryover.
- Two districts still had significant proportionality shortfalls.

### **EVERY SINGLE DISTRICT STILL HAD INCONSISTENCIES IN THEIR FINAL, COE-APPROVED LCAP.**

Every single district’s LCAP still had at least one inconsistency between their Budget Overview for Parents and their Action Tables, even the one district that had previously approved a consistent LCAP. Some of these inconsistencies were extremely significant – for example, four districts reported total LCFF funding amounts that had greater than \$30 million discrepancies between their Budget Overview for Parents and their Action Tables.

Additionally, although most districts seemed to resolve their proportionality shortfalls, COE review appeared to be shallow at best, leaving deeper issues around equitable budgeting unaddressed.

- COEs approved across-the-board contributing actions like the ones previously mentioned in the Salinas City Elementary School District and King City Union School District LCAPs, demonstrating a lack of rigorous analysis of whether actions listed as contributing actually increase or improve services for high-need students.<sup>xxviii</sup>
- To superficially meet proportionality, some districts reclassified non-contributing, across-the-board actions as contributing<sup>12</sup> and others arbitrarily inflated expenditures of contributing actions,<sup>13</sup> all without facing serious scrutiny from COEs.
- Although concentration add-on grant funding descriptions were improved, they still lacked enough specificity to determine where and how districts allocated new staffing.

<sup>10</sup> As of October 25, 2022.

<sup>11</sup> Districts and COEs are both required to post COE-approved LCAPs on their websites. Cal. Educ. Code § 52065.

<sup>12</sup> Compare 2022-2023 [Barstow Unified School District District LCAP](#) at 15, with the COE-Approved 2023-2023 [Barstow Unified School District LCAP](#) at 33 (demonstrating that Barstow Unified School District reclassified an across-the-board class size reduction from “non-contributing” to “contributing,” with little change to the language and no indication that this action was principally directed towards high-need students).

<sup>13</sup> As a stark example of this, in Hesperia Unified School District, the district doubled the funding for counselors—increasing the budget by more than \$3 million—but maintained the same number of counselors. Compare the district board-adopted [2022-2023 Hesperia Unified School District LCAP](#) at 42, with the COE-approved [2022-2023 Hesperia Unified School District LCAP](#) at 43. In addition, Morongo Unified School District increased expenditures for three contributing actions by millions of dollars without changing the descriptions at all. Compare the district board-adopted [2022-2023 Morongo Unified School District LCAP](#) at 36-37, 38, 54, with the COE-approved [2022-2023 Morongo Unified School District LCAP](#) at 40, 41, 58.



- Some COEs allowed districts to remove information from their LCAPs in order to shirk community accountability. For example, when we raised concerns that some San Bernardino County districts were using supplemental and concentration funding inappropriately to fund law enforcement, districts were able to secure COE approval by merely removing the word “probation” from their LCAP action titles or descriptions while leaving expenditures and descriptions unchanged.<sup>xxix</sup>

***ALARMINGLY, COES ALLOWED DISTRICTS TO ARBITRARILY INFLATE EXPENDITURES OF CONTRIBUTING ACTIONS TO MEET PROPORTIONALITY REQUIREMENTS.***

All of these issues contribute to an overall lack of transparency, equity, and accountability that undermine the purpose and spirit of LCFF.

## RECOMMENDATIONS

COE review is the main mechanism within LCFF to ensure that district LCAPs fulfill their purposes of equity, comprehensive strategic planning, and authentic community engagement. However, it is clear that COEs are often preoccupied with checking for surface-level consistency, completeness, and accuracy – and even then, they frequently fail to identify all deficiencies. This focus on basic compliance dilutes COEs’ abilities to closely examine and support districts on more complex issues around equity, shared decision-making, and continuous improvement.

### ***Mandate an Electronic LCAP Template***

A partial solution to this problem would be to **mandate the use of a robust electronic LCAP template**. Ideally, the electronic template would be able to do the following:

- Automatically populate numbers across different sections of the LCAP so that any numbers that are entered or updated stay consistent across the Budget Overview for Parents, the Goals and Actions section, the Increased or Improved Services section, and the Action Tables;
- Track changes between drafts so that community members can easily see how a district’s LCAP drafts have been revised in response to budget updates and community feedback; and
- Reject LCAP submissions for district board approval and COE review if sections are not complete or if proportionality is not met.

The California Department of Education (CDE) currently offers an LCAP eTemplate. However, use of the eTemplate is optional. We recommend integrating the above functionalities into the existing eTemplate and transitioning all districts to the electronic system to streamline basic compliance checks.

### ***Provide Additional Oversight and Support for County Offices of Education***

COEs routinely fall short of their duties by approving LCAPs that do not adhere to the LCAP template or the expenditure regulations.<sup>xxx</sup> The state should provide additional capacity-building and training to all COEs so that they can better understand and execute their responsibilities around not just LCAP review, but also their broader responsibilities around capacity-building and support for districts. We also recommend that the state **regularly audit** COEs to evaluate whether they are fulfilling their accountability function under LCFF and expand the System of Support to provide **additional oversight and support for COEs** that routinely approve inadequate LCAPs. Any



COE found to be struggling with their basic review, support, and accountability duties – through Uniform Complaint Procedure (UCP) findings, audits, or other reviews – should receive increased oversight by state agencies to monitor their progress in addressing any identified issues.

### ***Clarify Obligation to Fix Past Mistakes***

Additionally, the state should clarify that if a district is retroactively found – through UCP findings, audits, or other reviews – to have improperly spent supplemental and concentration funding on actions that did not increase or improve services for high-need students, they must **amend their current LCAP** to include that shortfall as carryover.<sup>14</sup> The district would then have to engage with students, families, and staff to determine how to use this carryover to properly address equity gaps. For example, if a district’s LCAP received COE approval, but a subsequent review through an audit or UCP complaint found that the district improperly spent \$2 million of supplemental and concentration funding on school police in the previous year – staffing that does not benefit and rather actively harms high-need students<sup>xxx</sup> – the district should be required to amend their current LCAP to add \$2 million to their proportionality obligation. This would ensure that high-need students get the benefit of funding that is intended to meet their needs and encourage districts to pay closer attention to whether the actions they propose are truly increasing or improving services for those students.

<sup>14</sup> Ideally, COE review would ensure that all planned contributing actions meet the increased or improved services requirement and that any improperly designated actions from the prior year are counted as carryover. Unfortunately, as our review demonstrates, COE review often fails to catch these issues, which deprives high-need students of millions of dollars of services that they are entitled to receive.

# COMPREHENSIVE STRATEGIC PLANNING: GOAL SETTING AND ACHIEVEMENT BASED ON THE STATE PRIORITIES

LCFF shifted California away from its prior, narrow “test and punish” philosophy to a multiple-measures accountability system that compelled every school district to address eight state priorities.<sup>xxiii</sup> The LCAP is designed to be a comprehensive strategic planning document that reflects how each district will achieve these eight state priorities along with any local goals.<sup>15</sup>

**At a minimum, districts must explain in their LCAPs how they plan to achieve 8 state priorities:**

<p><b>1 Basic Services</b></p> <ul style="list-style-type: none"> <li>▪ Properly assigned and fully credentialed teachers</li> <li>▪ Access to instructional materials</li> <li>▪ Properly maintained facilities</li> </ul>	<p><b>2 Implementing State Standards</b></p> <ul style="list-style-type: none"> <li>▪ Access to common core academic content and English language development for all students, especially English Learners</li> </ul>
<p><b>3 Family Engagement</b></p> <ul style="list-style-type: none"> <li>▪ Family participation in district and school decision-making processes</li> <li>▪ Promoting family participation in schools</li> </ul>	<p><b>4 Student Achievement</b></p> <ul style="list-style-type: none"> <li>▪ Standardized test scores</li> <li>▪ Advanced placement test scores</li> <li>▪ English learning proficiency and reclassification rates</li> <li>▪ College and career readiness</li> </ul>
<p><b>5 Student Engagement</b></p> <ul style="list-style-type: none"> <li>▪ Attendance rates</li> <li>▪ Middle and high school dropout rates</li> <li>▪ Graduation rates</li> <li>▪ Chronic absenteeism rates</li> </ul>	<p><b>6 School Climate</b></p> <ul style="list-style-type: none"> <li>▪ Suspension rates</li> <li>▪ Expulsion rates</li> <li>▪ Students and educators’ feelings around safety and connectedness (measured by school climate surveys)</li> </ul>
<p><b>7 Well-Rounded Curriculum</b></p> <ul style="list-style-type: none"> <li>▪ Access to and enrollment in a variety of classes, including core academic subjects (science, technology, engineering, and math), world languages, arts, health, career technical education, and physical education</li> </ul>	<p><b>8 Other Student Outcomes</b></p> <ul style="list-style-type: none"> <li>▪ Student outcomes in non-standardized assessments and metrics</li> </ul>

<sup>15</sup> See Cal. Educ. Code § 52064(e) (2022) (“The process of developing and annually updating the local control and accountability plan should support school districts, county offices of education, and charter schools in comprehensive strategic planning, accountability, and improvement across the state priorities and any locally identified priorities through meaningful engagement with local stakeholders.”) The LCAP Template instructions describe the LCAP process as “an annual planning process to evaluate [district] progress within eight state priority areas encompassing all statutory metrics,” and define “comprehensive strategic planning” as a process that “connects budgetary decisions to teaching and learning performance data” and allows districts to “continually evaluate the hard choices they make about the use of limited resources to meet student and community need.” See [2022-2023 LCAP Template Instructions](#) at 1.

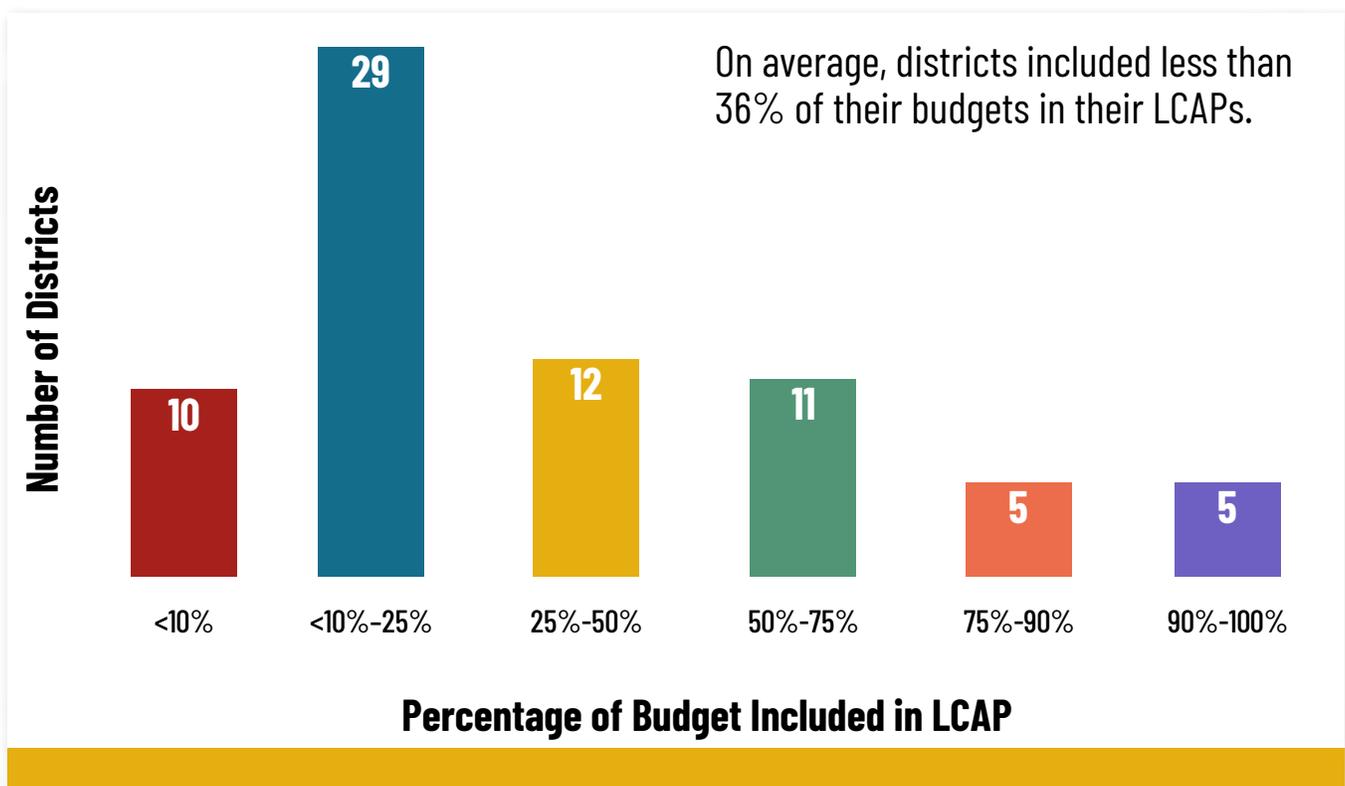
As a comprehensive strategic planning document, the LCAP is meant to illustrate the big picture of how a district plans to invest in programs, staff, and services to meet student and community needs. This helps districts articulate their vision, goals, and progress toward school and student success to their communities. However, in practice, districts include far too little of their budgets in the LCAP and do not clearly identify what they are doing, why they are doing it, or how their investments are moving them toward their goals, making it difficult to demonstrate and track the effectiveness of their efforts to meet student and community needs.

## A FRACTION OF THE BIG PICTURE: EXCLUDED PROGRAMS AND EXPENDITURES

California law is clear that LCAPs are a comprehensive strategic planning document that should include all of the programs, services, and expenditures related to achieving the district’s state priority-related goals, in addition to any locally identified priorities.<sup>xxxiii</sup> However, COEs are not providing the accountability to ensure that the information included in the LCAP is actually comprehensive.

In our review of 72 Budget Overviews for Parents approved by COEs, we analyzed the percentage of total revenue accounted for in the LCAP<sup>xxxiv</sup> and found the following:

- 51 districts (71%) included less than 50% of their budget in the LCAP.
- 39 districts (54%) included less than 25% of their budget in their LCAP.
- 10 districts (14%) included less than 10% of their budget in their LCAP.
- On average, districts included less than 36% of their budgets in their LCAPs.





The LCAP cannot be a comprehensive strategic planning document if it only includes a fraction of the district’s budget and plans. LCAPs must explain how districts will achieve the eight state priorities and any local priorities. In almost all cases, districts must use the majority of their resources to make progress toward these comprehensive goals. The fact that an overwhelming majority of the districts in this review included less than half of their budgets in their LCAPs points to huge gaps in strategic planning and a system-wide failure to use LCAPs as comprehensive planning documents.

The omission of important actions and expenditures from the LCAP has become increasingly problematic as more significant and transformative categorical funding programs become available to districts, such as the \$4.1 billion investment in school transformation through the California Community Schools Partnership Program (CCSPP), the ongoing multi-billion dollar investment in after school and summer school enrichment programs through the Expanded Learning Opportunities Program, the \$1.5 billion investment in Educator Effectiveness, and various COVID-relief initiatives, including the most recent \$8 billion investment in learning recovery through the 2027-2028 school year.

## COMMUNITY SCHOOLS

Community schools are a strategy to transform schools by, among other things, improving student outcomes, increasing family and student engagement, and creating the basic conditions for learning – all of which are state priorities that must be reflected in the LCAP. In May, approximately one month before districts adopted their 2022-2023 LCAPs, CDE announced the first cohort funding results for the CCSPP, a multi-billion dollar initiative to transform schools in California. Forty-nine (49) districts that already had a community schools strategy received CCSPP implementation grants.<sup>16</sup> As part of the grant, districts were tasked with integrating grant funding with other funding sources like LCFF to develop a sustainable funding model and were also encouraged to use planning tools like the LCAP to ensure alignment with existing initiatives and goals.<sup>17</sup> However, only 15 districts out of the 49 (less than one-third) that received implementation funding – and thus are clearly prioritizing the development and resourcing of community schools – included a community school action in their LCAP. An additional nine districts mentioned community schools, but did not have a specific related action in their LCAP. For instance, some districts mention the “community school approach” or the “coordinated community schools-based support model” in their LCAPs, but do not include any specific actions or expenditures. In total, less than half of the districts that are clearly prioritizing community schools as a strategy even mention community schools in their LCAP.

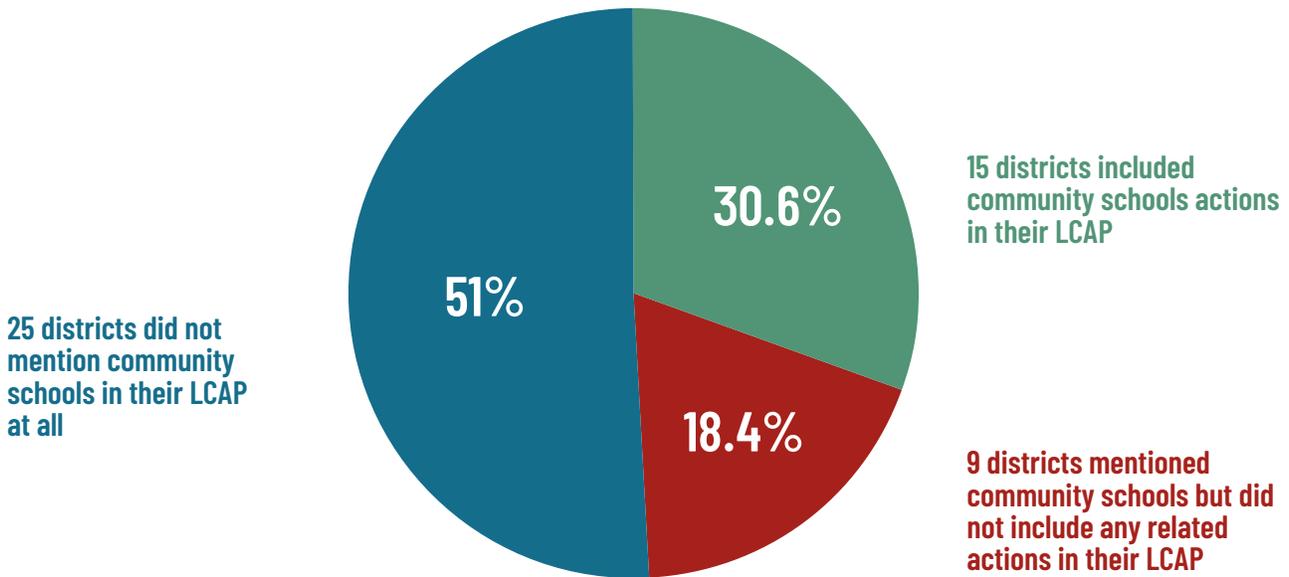
---

<sup>16</sup> In total, 50 school districts received a community schools implementation grant in the first cohort. Additional LEAs, such as charter schools and county offices of education, also received implementation grants, but we did not review the LCAPs for those entities. (For the full list of implementation grantees and grant amounts, see CAL. DEPT. OF EDUC., *Funding Results: California Community Schools Partnership Program: Implementation Grant* (last reviewed Aug. 10, 2022), <https://www.cde.ca.gov/fg/fo/r17/ccsppimp21results.asp>.) One of the districts, Lakeport Unified School District, did not have a 2022-2023 LCAP available online for public review as of Dec. 19, 2022. Therefore, the analysis is focused on the 49 districts where 2022-2023 LCAPs were available online. For the most part, we reviewed the final version of the LCAP approved by COEs, except in nine districts where COE-approved versions were not available online as of Dec. 19, 2022. For those nine districts, we used the most recent LCAP version on the district’s website. For additional detail on our community schools analysis, see [Appendix C](#).

<sup>17</sup> Cal. Educ. Code § 8902(m)(2)(C)(2022) (stating that CCSPP grantees will be evaluated for “evidence of best practices and successful strategies for integrating multiple funding sources to meet a local educational agency’s school improvement goals identified in their local control and accountability plan.”).



## Out of 49 CCSPP implementation grantees...



Of the 15 districts that included one or more community school actions in their LCAP, the majority did not appear to include the CCSPP funding in their LCAP – including the five districts that received the most funding.

As a comprehensive strategic planning document, the LCAP should reflect LCFF funds, CCSPP grant funds, and any other related funds being used to create full-service community schools. Otherwise, communities would not have the information they need to evaluate implementation, assess the effectiveness of actions, or identify the need for more resources.

## BRIGHT SPOTS IN COMMUNITY SCHOOL IMPLEMENTATION

**G**uerneville School District in Sonoma County integrated their community schools approach into their LCAP by identifying actions that fall under each community school pillar. Their primary community school action braids LCFF, CCSPP, and federal COVID relief funding and describes their community school implementation plan with specificity so that community members can easily track and evaluate implementation<sup>xxxv</sup>

Sausalito Marin City School District in Marin County included an LCAP goal integrating the community school model with their school climate initiatives. The LCAP reflects community feedback to deepen the community school model and identifies which actions will be funded using CCSPP grant funds<sup>xxxvi</sup>

## COVID-RELIEF FUNDING

Districts have also invested hundreds of millions of COVID-relief dollars in new or enhanced programs, services, and staff that are central to addressing the district’s LCAP goals. However, districts omitted many of these investments from their LCAPs. Many of the largest districts in California – which received the most funding – omitted all COVID-relief funding from their LCAPs, including Los Angeles Unified School District, Long Beach Unified School District, and San Bernardino City Unified School District.<sup>18</sup> This lack of transparent budgeting makes it difficult for community members to understand and hold districts accountable for how the money is spent.

For example, Long Beach Unified School District planned to spend \$8 million in federal COVID-relief funds in the 2022-2023 school year on intervention coordinators,<sup>xxxvii</sup> but they included none of those funds in their LCAP. The intervention coordinators are key to achieving Goal 3 in the district’s LCAP (student academic progress on the Common Core State Standards),<sup>xxxviii</sup> but because these positions are not included in the LCAP, they are omitted from the goal analysis, meaning there will be no public analysis of the effectiveness of this huge investment in academic support staff. This undermines the LCAP as a comprehensive strategic planning document and deprives community members of important information that they need to monitor implementation. Long Beach Unified School District and other school districts should not make this same mistake as they use the \$8 billion Learning Recovery Emergency Block Grant funds that will be available for the next 5 years. It is crucial to include those funds in the LCAP to show how they are funding actions and services designed to make progress toward the eight state priorities.



## A CLOUDED VIEW OF THE STRATEGIC PLAN: VAGUENESS, BUNDLING, AND SCHOOL SITE ALLOCATIONS

In many districts, the LCAP is not only an incomplete picture – it is also a clouded view of the district’s strategic budget decisions. Apart from all the actions that are *missing* from the LCAP, the actions that *are* included in the LCAP are often so vague or bundled that it is impossible to understand what districts are doing, why they are doing it, or how programs and services are moving them towards their goals.

<sup>18</sup> To determine if a district omitted COVID relief funds entirely from their LCAP, we reviewed the 2022-2023 Total Planned Expenditures Table. If the district did not include any funding under “Other State Funds” or “Federal Funds,” we concluded that they did not include any COVID relief funding in their LCAP. Many districts included some funding under these categories, but still omitted the majority of their budget from the LCAP. In these cases, it was not possible to isolate whether COVID-funding had been included or not.



## VAGUENESS

Although districts are required to describe “specific” actions in their LCAPs, many provided only vague descriptions. This excerpt from the Anaheim Union High School District LCAP is illustrative:<sup>xxxix</sup>

- **Action 1.7** Instructional options: District staff and teachers will implement non-traditional instructional options to address the multi-tiered academic needs of students in order to reach graduation and post-secondary goals. (Planned expenditures: \$6,587,500)
- **Action 2.1** Increase parent engagement: School and district staff will increase engagement, communication, and support for parents by establishing, expanding, or refining resources that are available at all schools to ensure families and students can meaningfully engage. (Planned expenditures: \$8,903,000)
- **Action 3.2** Mental and physical health: Staff will implement programs and systems to support the mental, physical, behavioral and emotional health of vulnerable students to reduce student suspensions, improve student learning, and promote well-being. (Planned expenditures: \$15,936,000)

The plain language of the term “specific action” requires identification of each discrete activity or service that the district intends to carry out in support of their state and local goals and their high-need students. CDE has clarified that actions must be described with sufficient specificity so that a district and their educational partners can assess the overall implementation and effectiveness of the actions.<sup>xl</sup> In the example above, it is not clear what “non-traditional instructional options” are available in Action 1.7, what parent engagement “resources” are offered in Action 2.1, or what “programs and systems” are available to support student mental and physical health in Action 3.2, which makes it impossible for students, families, and staff to evaluate the implementation and effectiveness of these actions.

This is not an isolated issue. Californians Together recently found that the majority of district LCAPs described professional learning in such generalized and non-specific terms that they could find little evidence of professional development for educators of English learners, even though this is legally required.<sup>xli</sup> Without descriptions of specific programs, services, or staff, it is impossible to determine what actions actually include, whether the actions were implemented or effective, or whether an action identified as increasing or improving services for high-need students actually does so.

## BUNDLING

Many districts continue to combine disparate programs, services, and positions into single actions with one large line item, despite the fact that CDE has made clear that such “bundling” is impermissible.<sup>xlii</sup> For example, Alum Rock Union Elementary School District combines health support (licensed vocational nurses, registered nurses, and contracted nursing agencies), school office assistants, bus drivers, transportation services, library technicians, and custodial support into one contributing action, “Additional Support Services for Students.”<sup>xliii</sup> This single action has a budget of \$5.4 million, which accounts for 20% of the district’s supplemental and concentration funds. However, the bundling of all these programs and staff obscures how much the district is investing in each individual area (e.g. custodial support versus nursing services) or whether these individual programs or services should actually be counted towards their increased or improved services requirement (some positions appear to be

justified while others do not). Moreover, the bundling of requested actions with non-requested actions makes it impossible to determine whether investments in community priorities actually increased.

Similarly, in Long Beach Unified School District (LBUSD), community members advocated for ethnic studies, including Khmer history. LBUSD claimed that they had integrated this feedback into their action around “College and Career Readiness.”<sup>XLIV</sup> However, the “College and Career Readiness” action includes a wide range of programs – from college visits to summer school – most of which have nothing to do with ethnic studies. In fact, the only reference to ethnic studies in this action is “[d]ual enrollment opportunities such as the Ethnic Studies Program with the California State University, Long Beach.”<sup>XLV</sup> The action does not mention any ethnic studies courses provided by LBUSD educators, nor does it reference Khmer history. This bundling and resulting lack of detail make it very difficult to ascertain whether LBUSD actually implemented community feedback.

## SCHOOL SITE ALLOCATIONS

Many districts allocate funding to school sites to use at their discretion. In our in-depth review of 20 district LCAPs across the state, two-thirds included at least one discretionary school site action.<sup>19</sup> All of these actions came out of supplemental and concentration funding and were thus meant to be used to increase or improve services for high-need students. The median amount of supplemental and concentration funds allocated through discretionary school site allocations in these districts was 8%; in Los Angeles Unified School District, which was an outlier, it was almost 65%. Although some districts allocated funding to schools based on high-need student enrollment or other equity-based methodologies, at least half do not appear to have any equitable methodology for distributing funding to school sites.

Greater funding flexibility at the school site level is crucial, as it allows students, families, and staff within school communities to make decisions informed by local needs and context, which vary from school to school within a district. Such allocations, however, remain subject to LCFF legal

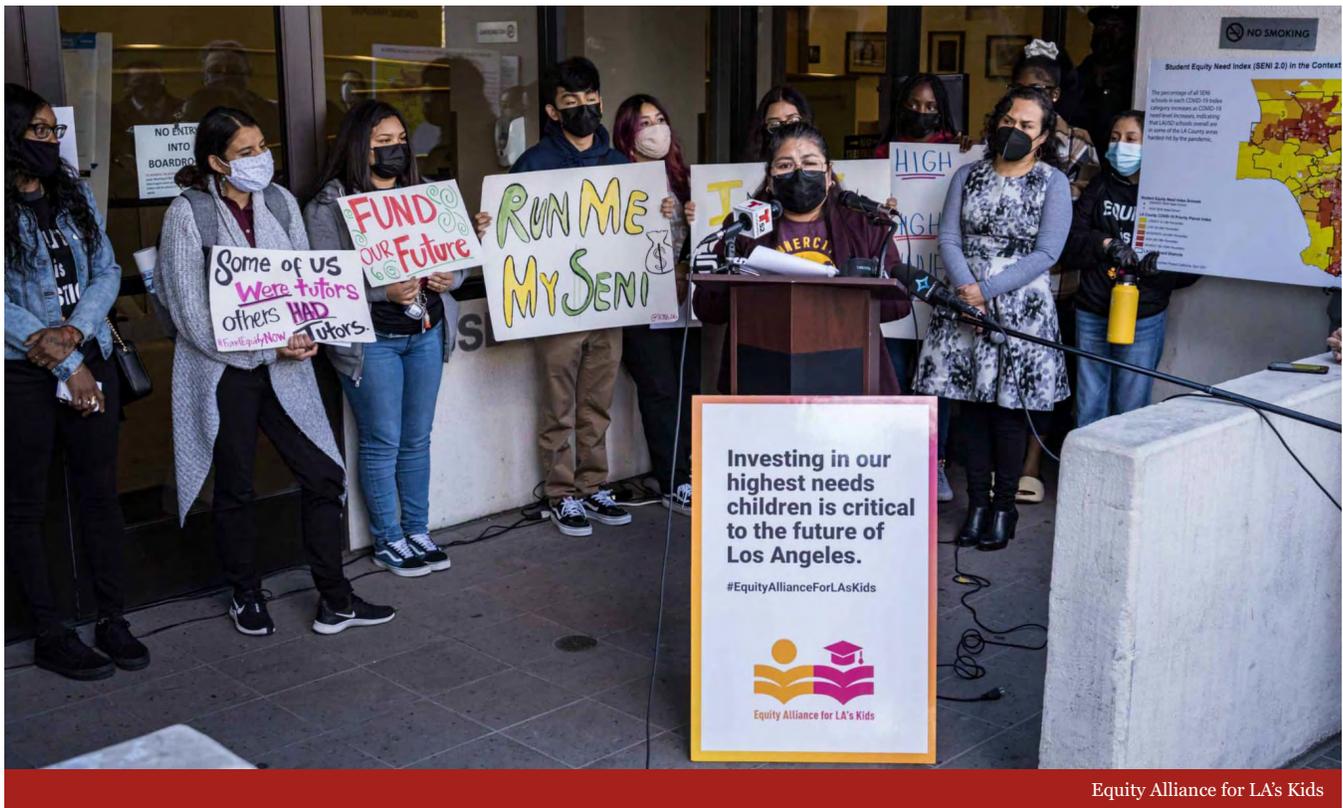


Equity Alliance for LA's Kids

<sup>19</sup> One of the LCAPs we reviewed in depth was a single school district, so we omitted that district from our analysis. Of the remaining 19 LCAPs, 13 had one or more school site discretionary allocations. We identified an action as a “discretionary school site allocation” if the action description indicated that the school site had authority to decide how to use the funds.

requirements that they be used to increase or improve services for high-need students. Thus, such flexibility must be accompanied by transparency, accountability, and oversight to ensure that investments are legal, equitable, and responsive to community needs. Often, school site allocations lack transparency because there is no description of how the money will actually be spent nor assurances that they were used to serve each school's high-need student population as required.<sup>20</sup>

Although schools may include discretionary LCFF school site allocations in their School Plans for Student Achievement (SPSA),<sup>21</sup> it is usually very difficult to match up LCAP actions with SPSA actions, and SPSAs are often not easily accessible online. The \$24.7 million discretionary school site action in San Bernardino City Unified School District's LCAP, for example, states that site-based resources will be provided based on the needs outlined in the SPSAs, but there is no link to the SPSAs online or in the LCAP.<sup>xlvi</sup> Therefore, practically speaking, it is not possible to determine how schools are spending these funds, much less whether they are effective, informed by community feedback, and in compliance with legal requirements.



Equity Alliance for LA's Kids

Engagement with students, families, and community is an essential component of LCFF that applies to school site discretionary actions. However, it is unclear whether districts ensure that schools engage with all the relevant community members when deciding how to use their discretionary allocation. School Site Councils (SSCs) should be part of any decision-making processes around school site allocations, and districts have an obligation to ensure that these councils are more than rubber-stamping entities with

<sup>20</sup> For example, school site allocations for academic acceleration in Salinas City Elementary School District can be used "as needed for [each school's] student population," but there is no description in the LCAP of how those funds are actually used. See [2022-2023 Salinas City Elementary School District LCAP](#) at 43.

<sup>21</sup> A School Plan for Student Achievement (SPSA) is a tool to create a budget and plan of action to meet the educational and social-emotional needs of students. It maps out the school's goals, strategies, actions, services, and proposed expenditures. All schools receiving Title I funding or that are identified as needing additional support or assistance under federal law must complete a SPSA.



cookie-cutter agendas. Districts should ensure that SSCs are spaces for meaningful dialogue, shared decision-making, and leadership development for all participants. Schools should also ensure that students and the broader school community, especially the highest need families and students, have an opportunity to provide feedback and recommendations on how to use LCFF school site allocations.

Without greater transparency, neither district staff nor community members can assess whether schools are actually using these funding allocations to increase or improve services for low-income students, English learners, and foster youth, making it impossible to hold schools accountable for equity.

## BRIGHT SPOTS IN SCHOOL SITE ALLOCATIONS

**L**os Angeles Unified School District (LAUSD) in Los Angeles County allocates approximately 65% of their supplemental and concentration funds to school sites. Instead of using high-need student enrollment to allocate discretionary funding to schools, as most districts do, LAUSD uses the Student Equity Needs Index (SENI), an index that uses academic and community indicators to target funding to schools that need it most. This index was developed by the Equity Alliance, a coalition of community organizations. SENI provides more sophisticated targeting by combining student enrollment data with student outcome data (such as suspension and absenteeism rates and test scores) and community indicators (such as asthma severity and non-fatal gunshot injuries).<sup>XLVII</sup> Each goal in LAUSD’s LCAP has a SENI action (disaggregating funding by purpose) and each school site creates a Targeted Student Population plan, which describes how the school intends to use their SENI funding.<sup>XLVIII</sup>

**Sacramento City Unified School District** in Sacramento County has a SPSA planning timeline that allows for alignment between the school site plan and the LCAP. All school site plans are linked on the district’s LCAP webpage.<sup>XLIX</sup> In addition, the discretionary school site allocations in their LCAP are not lumped together in one mega-action, but are instead split into different actions based on purpose, including school climate, English learner progress, and more.<sup>L</sup> This allows community members to understand and track the different types of funding available at their schools.

The LCAP cannot serve as a comprehensive strategic planning document if it only includes a fraction of a district’s budget and omits key actions, expenditures, and descriptions necessary to achieve their goals. If the goal of comprehensive strategic planning is to “evaluate the hard choices [districts] must make about the use of limited resources to meet student and community needs,”<sup>LI</sup> all actions and expenditures that contribute towards state priority goals in the LCAP should be included, regardless of funding source. Community accountability is only possible when the LCAP provides a comprehensive picture of districts’ visions, goals, and progress. If communities do not know what their districts are doing and cannot track implementation or hold their districts accountable for meeting student needs, they will disengage from their districts. As a result, districts lose the most vital component of their continuous improvement process – feedback and recommendations from the individuals who are directly impacted by their decisions.

## RECOMMENDATIONS

### *Clarifying Guidance on Being Comprehensive*

To realize the vision of the LCAP as a comprehensive strategic planning document, we recommend that the state do the following:

- Require districts to **include all actions and expenditures** that are designed to make progress on state priorities in the LCAP, **regardless of funding source** (including Expanded Learning Opportunities Program allocations, Learning Recovery Emergency Block Grant funds, Educator Effectiveness, and CCSPP grant funds).
- Provide **clear guidance** and support to districts on creating and describing specific actions (as opposed to vague or bundled actions) and **empower county offices of education to reject LCAPs** that do not meet this standard.
- Require districts to **align SPSA templates** with their LCAPs, post SPSAs on district LCAP webpages, and instruct schools to include any school site discretionary funding (regardless of funding source) in their SPSAs.<sup>22</sup>
- Add a provision to the LCAP template instructions that requires districts to **explain their methodology** for allocating school site discretionary funding to schools and requires districts to meet the legal requirements for uses of supplemental and concentration funds through school site allocations, including **engagement at the school site level**.

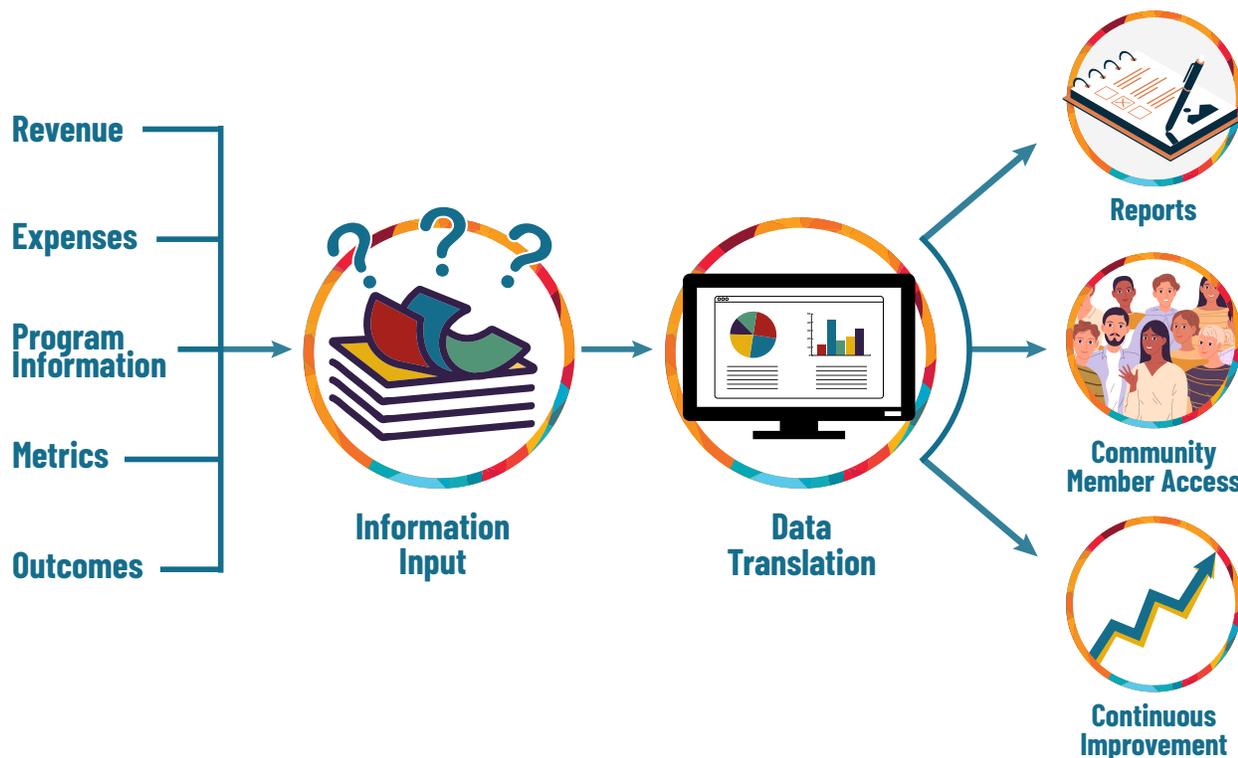
### *Creating an Integrated Web-Based Strategic Planning Platform*

Although these recommendations will improve the utility of the LCAP as a comprehensive strategic planning document, California ultimately needs a bigger and bolder shift to realize the vision of LCFF. Specifically, we recommend that California invests in the development of an **integrated, interactive, and accessible web-based platform** that combines data with budgetary information, including the information that is included in LCAPs, SPSA, SARCs, SELPAs, and other expenditure plans. This would go beyond the previously discussed LCAP eTemplate – which would automate basic compliance checks – to create a web-based platform that allows districts to input strategic planning information on the back end and “translates” the information for members of the public on the front end. Such a platform would become a “one-stop shop” for strategic planning, making it possible to identify actions and expenditures across the eight state priorities, standard substantive categories (such as mental health, arts, and family engagement), years, and districts, and to evaluate effectiveness by linking actions with associated metrics. The interface would need to be simple and user-friendly, similar to the California Dashboard and Ed-Data. It would include data visualization tools, options to view more data, and functionality to compare information within districts (both year-to-year and between school sites) and between districts and statewide averages. Additionally, school site administrators, LCAP administrators, COE staff, and CDE staff would be able to use this platform to generate a multitude of compliance reports and strategic plans, including LCAPs, budget reports, and community school grant reports, among others. This bold and

<sup>22</sup> CDE has emphasized the need to integrate SPSAs with LCAPs – see CAL. DEPT. OF EDUC., *Planning for the LCAP and School Plan*, (last reviewed Sep. 16, 2022), <https://www.cde.ca.gov/re/lc/planninglcapschoolplan.asp>.

innovative approach to comprehensive strategic planning would make compliance more efficient, create opportunities for more robust and informed community engagement, and allow for better tracking of the effectiveness of actions to improve student outcomes.

## COMPREHENSIVE ONLINE STRATEGIC PLANNING PLATFORM



Having an integrated, web-based platform would streamline strategic planning processes and make information much more accessible for all community members:

- **School level:** If students, families, and/or school staff were interested in a particular issue, like arts education, they would be able to review their school's investments in arts over several years and compare the data against arts investments and programs at other schools in the district. If investments at their school had decreased over time or were significantly lower than in other schools, they could determine that their school's arts program was being underfunded. Looking at other schools' plans could also reveal new or creative ways to leverage funding or community partnerships to expand their school's arts program.
- **District level:** When districts are making decisions about how to invest resources, community members would be able to use the platform to identify and evaluate needs. For example, a community organizer, district administrator, and/or board member could identify where to target new funding for mental health resources if they could easily review investments in mental health supports across all funding sources at the district and school site level alongside school climate and student outcome data.



- **State level:** State policymakers, agency staff, and policy advocates would be able to compare data and investments across different districts to identify trends in funding, analyze correlations between investments and outcomes, and identify the need to target state funding or resources in particular areas.

The development process must combine community knowledge from students, families, educators, administrators, and other educational partners with technical expertise so that the platform is truly accessible to all audiences. A project of this size and scope would require a significant investment of time and resources from the state, the technological industry, and community members. However, this shift from a multitude of compliance-based spending plans to a comprehensive, web-based strategic planning platform for school districts has the potential to transform the transparency of and community engagement with the public school system in California.

# MEANINGFUL ENGAGEMENT

“Local control” is about giving decision-making power back to local communities. Local control is not limited to district boards and officials; it is also meant to provide some measure of control to community members – students, families, school staff, and others – so that they can influence decisions from the district level to the school level. Students, families, school staff, and other community members are most often in the best position to understand student and school needs. They are also invaluable partners in identifying and investing in solutions. The LCAP process is meant to tap into that knowledge by creating a formal structure for districts to engage in shared decision-making with community members. Recognizing that engagement can and should vary in different communities, the LCAP process sets minimum requirements for community engagement instead of dictating uniform procedures.

Districts must:

1. Convene a Parent Advisory Committee and (if applicable) a District English Learner Advisory Committee, present their LCAPs to these committee(s) for review and feedback, and respond in writing to any comments from these committee(s).<sup>LII</sup>
2. Establish a process for students to review and comment on the development of the LCAP.<sup>23</sup>
3. Consult with school staff and unions on the development of their LCAPs.<sup>LIII</sup>
4. Hold a public hearing for their proposed LCAP “to solicit the recommendations and comments of members of the public” and then approve and adopt the LCAP at a second public hearing that must be held “after, but not on the same day” as the first public hearing.<sup>LIV</sup>



Gente Organizada

<sup>23</sup> Cal. Educ. Code § 52063 (2023); see also CAL. DEPT. OF EDUC., *Local Control and Accountability Plan (LCAP)* (last reviewed Jan 12., 2023), <https://www.cde.ca.gov/re/lc/> (defining the phrase “consult with pupils,” “as used in *Educ. Code* §§ 52060, 52066, and 47606.5, means a process to enable pupils, including unduplicated pupils and other numerically significant pupil subgroups, to review and comment on the development of the LCAP. This process may include surveys of pupils, forums with pupils, pupil advisory committees, or meetings with pupil government bodies or other groups representing pupils.”) S.B. 997 recently strengthened student input in the LCAP process. Beginning July 1, 2024, school districts serving middle school or high school students must include at least 2 students as full members of the parent advisory committee or establish a separate student advisory committee. School districts must make a particular effort to reach out to at-risk or disadvantaged students to serve in an advisory capacity. See Ch. 922, S.B. No. 997, 2021-22 Reg. Sess. (Cal. 2022).

These requirements are a floor that districts are meant to build upon, not a ceiling that prevents them from doing more.

## A FLOOR, NOT A CEILING: COMMUNITY ENGAGEMENT EFFORTS

To evaluate how districts engaged with their communities, we reviewed LCAPs in 20 districts across the state. Our review focused primarily on the “Engaging Educational Partners” section of each LCAP, where districts identified how they attempted to engage their communities, whom they reached and the timelines in which they did it. We then reviewed a larger group of 70 districts to assess district implementation of LCFF’s public hearing requirements.

**85% OF DISTRICTS REPORTED RECEIVING FEEDBACK THAT ENGAGEMENT WAS NOT ACCESSIBLE ENOUGH.**

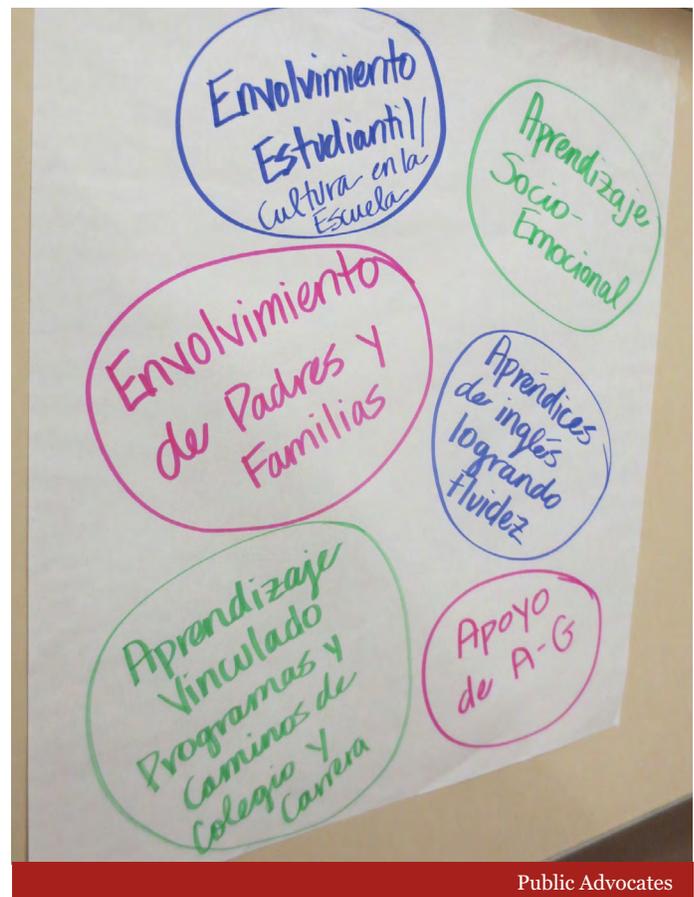
Most districts complied with the letter of the law (with the exception of the back-and-forth communication required between parent committees and district superintendents), but fell far short of the spirit of the law. Although a number of promising practices and bright spots emerged, by and large, communities were dissatisfied with districts’ engagement efforts, and 17 out of 20 districts (85%) reported receiving feedback that engagement was not accessible enough, evincing a widespread failure among districts to engage their communities meaningfully.

### FAMILY ENGAGEMENT

As discussed above, LCFF mandates two parent committees, PACs and DELACs, to be engaged in the LCAP process. All the districts we reviewed had a PAC and DELAC, but there was little evidence of authentic dialogue between the districts and these committees.

- Only eight out of 20 districts (40%) explicitly mentioned presenting the draft LCAP to PACs and DELACs. Two of these eight districts stated that the committees had no comments or feedback, which seems unlikely and suggests a significant breakdown in the LCAP engagement process.
- Only five districts (25%) mentioned providing responses to parent committee feedback as required by law.

In our review, we found that some districts formed additional advisory committees that reflected their communities and needs. However, most did not.





- Only five out of 20 districts (25%) mentioned engagement with advisory committees comprising Black community members, despite Black students often being both highest need and most historically disenfranchised by the education system.
- Less than half of the districts (45%) mentioned advisory groups focused on specific racial groups (usually Black or Indigenous families) or dedicated to racial justice more broadly (such as an independent citizens oversight committee on racial justice).
- Only two out of 20 districts (10%) created advisory groups focused on foster youth and/or unhoused students.

Given the persistent disparities in outcomes for historically marginalized students that exist in many districts and the critical role that these students and families play in forming solutions, *all* districts should prioritize and target engagement to families that have been served least well by our public school system.

Moreover, language access is a crucial component of effective family engagement. State and federal law require schools and districts to communicate information to multilingual families in a language they can understand.<sup>24</sup> However, the LCAP does not require districts to describe how they provided language access for engagement, which makes it difficult to assess whether districts are effectively communicating with students and families whose primary languages are not English. Half of the districts we reviewed (10 out of 20) did not provide any evidence that they conducted multilingual community engagement. The other half of the districts we reviewed described language access efforts in at least one language beyond English, and six provided interpretation in more than two languages.

## BRIGHT SPOTS IN LANGUAGE ACCESS

**S**an Diego Unified School District in San Diego County provided interpretation in seven languages at their board workshop to present their LCAP to their community.<sup>LV</sup>

Sacramento City Unified School District in Sacramento County held a series of five listening sessions to seek input on how to best support students with the highest needs. Each session offered simultaneous translation in Spanish, Hmong, Chinese, and Vietnamese.<sup>LVI</sup>

While most other districts either did not mention translation or only mentioned translation of select materials and resources, Pomona Unified School District in Los Angeles County translated every aspect of their LCAP engagement process into Spanish, including surveys, LCAP resources, and superintendent responses to committee questions and comments.<sup>LVII</sup>

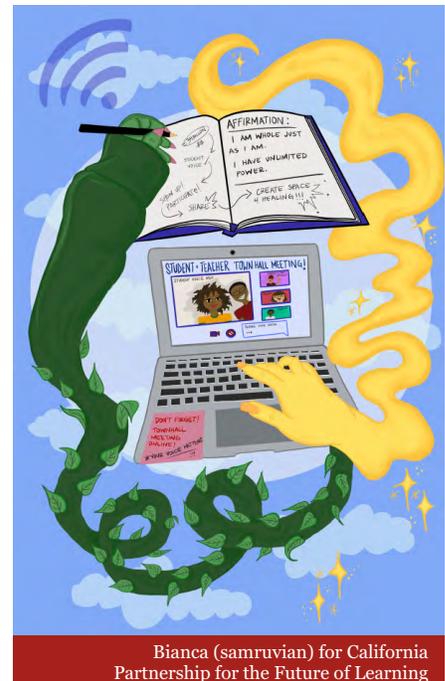
<sup>24</sup> See Cal. Educ. Code § 48985 (requiring translation of materials provided to parents into any language that is spoken by 15 percent or more of pupils enrolled in a particular school); 20 U.S.C. 6311(b)(2)(B)(x) (requiring academic assessment reports to be provided in a language that parents can understand, to the extent practicable); 20 U.S.C. 1703(f) (requiring districts to “take appropriate action to overcome language barriers that impede equal participation by its students in its instructional programs”); see also U.S. DEPT. OF JUST. & U.S. DEPT. OF EDUC., *Information for Limited English Proficient (LEP) Parents and Guardians and for Schools and School Districts that Communicate with Them* (last accessed Feb. 6, 2023), <https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-lep-parents-201501.pdf>.

## STUDENT ENGAGEMENT

All districts included some consultation with students, but the degree of consultation varied widely.

- Eight out of the 20 districts (40%) only performed the bare minimum for student consultation, seeking feedback solely through surveys without pursuing any further dialogue or direct conversations with students to better understand their responses or broader experiences.
- Approximately 40% of districts formed a student advisory group, although these groups did not necessarily focus on the LCAP. Only three districts – Alum Rock Union Elementary School District, Anaheim Union High School District, and Oakland Unified School District – included students on their multistakeholder LCAP advisory committees.

Additionally, two districts engaged directly with grassroots youth organizations: Californians for Justice, a statewide youth organization, had a dedicated engagement session with East Side Union High School District in Santa Clara County,<sup>LVIII</sup> and La Cosecha, a youth-led group in Monterey County, held three meetings with Salinas Union High School District in Monterey County.<sup>LIX</sup> However, these engagement sessions seemed to be initiated by the grassroots groups and not by the districts. Ideally, districts should affirmatively reach out to grassroots youth groups for input and also leverage these organizations' expertise to support the district in engaging with all students.



## BRIGHT SPOTS IN STUDENT ENGAGEMENT

**S**alinas Union High School District in Monterey County provided designated time in some classrooms during the school day for students to fill out their student survey.<sup>LX</sup> As a result, they received more than 8,000 student survey responses, accounting for approximately half of the students in the district.<sup>LXI</sup> This is particularly impressive when compared to much larger districts that reported significantly lower response rates to surveys.<sup>25</sup> Standardizing classroom time to provide information about the LCAP and administer surveys would yield even higher response rates.

Some districts used innovative methods to engage students: **Los Angeles Unified School District** in Los Angeles County conducted a series of focus groups with targeted student groups;<sup>LXII</sup> **Long Beach Unified School District** in Los Angeles County offered classroom lessons designed to gather feedback;<sup>LXIII</sup> **Fresno Unified School District** in Fresno County provided student lunchtime booths;<sup>LXIV</sup> and **Sacramento City Unified School District** in Sacramento County held LCAP drop-in sessions for students.<sup>LXV</sup>

<sup>25</sup> For example, only 167 students participated in the LAUSD ThoughtExchange survey out of approximately 575,000 students. See [2022-2023 Los Angeles Unified School District LCAP](#) at 28.

## PUBLIC HEARINGS

The LCAP public hearing requirements are meant to allow the public an opportunity to provide feedback on the LCAP that the district can take into account before adopting a final plan at their second public hearing. Depending on the timing of these hearings and districts' other community engagement efforts, public hearings can be both the first and last time that community members can provide feedback on a full draft of the LCAP. Usually, community members only have 72 hours to review LCAP drafts prior to the public hearing, which is not sufficient time to digest hundreds of pages of dense information.

We were able to track public hearing dates in 70 out of 72 districts and found:

- 63 out of 70 districts (90%) did not hold a first hearing until June.
- 25 out of 70 districts (36%) adopted the LCAP a week or less after the public hearing, and seven<sup>LXVI</sup> out of 70 (10%) held their public hearings only one or two days apart.

Though these short timelines technically comply with the law, they undermine the *spirit* of the law, which intends for public hearings to be one of the most important avenues for community engagement and dialogue. It is impossible for districts to incorporate community feedback into their draft LCAPs and still comply with the 72-hour posting requirement under the Brown Act<sup>LXVII</sup> when the public hearings are only a day or two apart. Such truncated timelines offer little to no opportunity for districts to thoughtfully review, consider, and incorporate community feedback in the draft LCAPs they present to their boards for approval.

**SEVEN DISTRICTS  
HELD THEIR PUBLIC  
HEARINGS ONLY ONE  
OR TWO DAYS APART.**





During the next phase of the LCAP process, if a COE requests changes to a district's LCAP before granting approval, the district is required to share that information at a public meeting.<sup>LXVIII</sup> In our review, some districts included "information updates" on COE review that seemed to focus on COE approval and glossed over revisions. In others (almost half of the districts we reviewed), it was unclear whether district staff presented the amended LCAP to their board at all, which leaves community members in the dark as to how their districts' strategic plans have changed, or whether the districts have changed their strategic plans at all.

Public hearings are a critical avenue to ensure that districts share their most up-to-date strategic plans and receive feedback on those plans from community members. Approaching these hearings as checkboxes does a disservice to districts and community members alike by limiting opportunities for authentic engagement and clouding efforts at transparency.

## **BRIGHT SPOTS IN COMMUNITY ENGAGEMENT**

**O**akland Unified School District in Alameda County demonstrated an impressive degree of shared leadership and community capacity-building in their LCAP engagement process. Their LCAP detailed the extensive planning meetings that committee members held to plan, prepare, study, and build relationships, which suggests that these committees are operating through a collaborative leadership model rather than acting as compliance bodies directed by district staff.<sup>LXIX</sup> Oakland Unified is also the only district we reviewed that was transparent about the membership of each of their committees, which is important to assess whether the committees are representative of the school community.<sup>LXX</sup>

Eight out of 20 districts (40%) reflected engagement with community organizations in their LCAP. Los Angeles Unified School District in Los Angeles County holds regular meetings with community organizations that provide regular opportunities to share feedback and receive updates on LCAP programs and development.<sup>LXXI</sup> Meanwhile, San Diego Unified School District in San Diego County partnered with the National Center on Education and the Economy, a nonprofit education research center, to facilitate 34 community input series between July and September 2021, create a report to inform the district's LCAP, and brief the district's incoming superintendent on the community's highest priority issues.<sup>LXXII</sup>

School site engagement on the LCAP is crucial to align school and district goals and actions and to meet students and families where they are. Eight out of 20 districts (40%) reflected specific school-based family engagement around the LCAP. Del Norte Unified School District in Del Norte County even engaged students, families, and community members at each community of schools multiple times.<sup>LXXIII</sup>

## DISTRICT IMPLEMENTATION OF COMMUNITY FEEDBACK

Even the best efforts to collect feedback are meaningless if districts do not authentically consider and implement the feedback. To assess the implementation of community feedback, we reviewed the “Goals and Actions” and “Expenditure Tables” sections of 20 district LCAPs to determine whether districts increased or decreased program investments based on community input. Unfortunately, many districts lumped together all the feedback they received, making it difficult, if not impossible, to determine where the feedback came from and whether districts were hearing from and listening to the most disenfranchised members of their communities. Additionally, some districts only relied on limited data to summarize feedback, effectively ignoring feedback from other sources.

## THEMES FROM COMMUNITY INPUT ACROSS THE STATE



### Mental Health and Social Emotional Health Resources

Psychologists  
Counselors  
On-Campus Mental Health Services  
Trauma-Informed Practices  
Race-Based Trauma Support



### Well-Rounded Educational Opportunities

Arts Education  
Music  
Field Trips  
Ethnic Studies Classes  
Sports  
Science Camps



### Academic Support for Black Students and English Learners

College Preparedness Resources  
Intervention Programs  
Mentors  
Tutors



### School Climate and Reimagining Safety

Bullying Prevention  
Restorative Justice  
Culturally Relevant Training  
Improving Crisis Response Protocols

Despite requests from the community to increase investments and/or expand programs and services in priority areas, some districts either made no changes or actually decreased investments in those areas. For example:

- In Sacramento City Unified School District, students and families pressed for culturally relevant professional development for staff, anti-racism training, and more diverse educators.<sup>LXXIV</sup> However, the district cut funding for “Anti-bias/Anti-racism Professional Learning” by almost 80%, decreasing the \$2.2 million budget from the 2021-2022 school year to \$500,000 for the 2022-2023 school year.<sup>LXXV</sup>
- Pomona Unified School District made broad and unsupported generalizations about how their LCAP was influenced by specific input from community members. The district stated that “the requests of educational partners were prioritized based on the success and challenges with implementing [the

district’s] current actions,” but never identified specific changes made to the LCAP in response to community feedback.<sup>LXXVI</sup> The one concrete priority that was described, tutoring,<sup>LXXVII</sup> was not reflected in the LCAP at all.<sup>26</sup>

In some cases, districts were responsive to recommendations, but only outside of the LCAP. For example, San Bernardino City Unified School District partnered with the African American Task Force and Congregations Organized for Prophetic Engagement (COPE), a local community-based organization, to create a District African American Advisory Council (DAAAC). DAAAC provides a regular meeting space for Black parents to be informed about district priorities and to provide input about the needs of their community, such as the need for tutoring. After DAAAC communicated the need for tutoring and other support to address opportunity gaps for Black students and specified their preferred provider, the district initiated a tutoring contract with that provider for all students. In addition, the district responded to DAAAC’s feedback by providing equity counselors and increasing access to the Sankofa program, which provides culturally relevant classroom settings, by providing transportation and designating it as a magnet program. However, the district did not memorialize any of these recommendations or investments in their LCAP. They even removed mentions of services designed to close opportunity gaps for Black students that had been included in their past LCAPs. In addition, the district did not include a summary of feedback from DAAAC in their LCAP, effectively erasing the contributions of this important group. It is critical for districts to not only be intentional about engaging with specific communities, but also to memorialize engagement and resulting actions in their LCAPs so that families feel valued, have ownership over the new programs, and understand how they influenced decision-making.



COPE

<sup>26</sup> There is no tutoring action. The only references to tutoring in the LCAP are in the foster youth action (Action 4.11) and the AVID action (Action 4.1).



## BRIGHT SPOTS IN IMPLEMENTING FEEDBACK

**S**ome districts made efforts to not only increase funding but also expand and add programs to better reflect feedback.

**Anaheim Union High School Unified School District** in Orange County responded to their community's highest priority request for more psychologists, counselors, social workers, and trauma-informed practices by increasing investments in mental health from \$10.1 million to nearly \$16 million.<sup>LXXVIII</sup> Investments were used to add temporary and permanent support staff (counselors, social workers, and psychologists) and a mental health screening tool for all ninth-grade students.<sup>LXXIX</sup>

**Los Angeles Unified School District** in Los Angeles County responded to feedback from Black students and other community members around expanding the Black Student Achievement Plan (BSAP) by establishing a new LCAP goal that increases transparency around BSAP program implementation. Although the district's implementation of BSAP has lagged behind, the new goal includes development of a culturally responsive unit, student needs assessment, African-American Studies coursework, and community-based safety pilots, while also allowing community members to track progress and hold the district accountable for developing discrete pieces of the plan.<sup>LXXX</sup>

## RECOMMENDATIONS

It is clear that more needs to be done to strengthen community engagement practices so that the LCAP process can realize its full potential as a feedback loop between students, families, staff, and districts.

### *Improving the LCAP Engagement Timeline*

To account for the state budget development timeline and create more meaningful opportunities for community input and accountability, we recommend that the state update the LCAP engagement requirements:

- Require districts to **publish a draft LCAP by the end of April** and **hold their first public hearing before the governor's May Revise budget proposal**, while they are still making decisions about their budget priorities and strategic plans. The draft LCAP should be available at least **10 days prior to the public hearing** to allow sufficient time for the public to review the document prior to providing recommendations.
- Require districts to **publish a revised draft LCAP in June** that incorporates feedback provided at the public hearing and incorporates estimates from the Governor's May budget revision. The second public meeting to adopt the LCAP should happen no less than two weeks (and ideally, according to our proposed timeline, a month) after the first public hearing to give districts enough time to truly consider and incorporate community feedback before district boards adopt the LCAP.

- Require districts to **engage students, families, and staff** on how to **prioritize spending** if there are **significant changes after the Governor’s May budget revision is released**. Priorities should be documented in the LCAP, which will likely require adding a prompt to the engagement section of the LCAP.

### **Building Capacity for Meaningful Engagement**

As discussed above, districts must build their capacity to meaningfully engage with students and families, particularly multilingual learners and other historically marginalized student groups. We recommend that districts:

- Participate in the **Community Engagement Initiative (CEI)** – a statewide effort to build the capacity of school districts to implement effective, equitable, and culturally responsive community engagement practices through a peer learning model – or other opportunities to build engagement capacity.<sup>LXXXI</sup>
- **Invest resources in meaningful engagement**, such as hiring designated staff to engage students and families at the school and district level, contracting with community-based organizations to support engagement and capacity building, and providing stipends for parents and students to develop their leadership skills and co-facilitate engagement spaces and training. School site staff that run parent committees, as well as families, students, teachers, and principals, should be prioritized for training and capacity-building. Districts should also prioritize **investing in high-quality interpretation and translation** to enable multilingual learners and their families to participate fully in engagement processes.
- **Implement research-based practices** to ensure engagement is a meaningful dialogue and targeted to highest need groups.<sup>LXXXII</sup>





- **Implement community-based recommendations** gathered during the LCAP process. In our review, we consistently saw requests for:
  - Expanded services like parent and family workshops to build partnerships between families and schools;
  - Family empowerment strategies with a focus on technology, academics, expanded resources for family members to participate in advisory committees, and building capacity for families to best support their children;
  - Clear and easy access to information for families on how to get involved in their children’s education; and
  - Communications across multiple avenues, including targeting communications to students directly as opposed to only including parents and guardians.

## **Strengthening Accountability for Meaningful Engagement**

To support districts in building their capacity for meaningful engagement, the state must improve its accountability mechanisms for meaningful engagement.

### **Updating LCAP Engagement Prompts**

- The LCAP template should be amended to require districts to provide more transparency around their engagement efforts and implementation of feedback. Specifically, the LCAP engagement prompts should require districts to disaggregate feedback received by different groups and to be transparent about whether the feedback was implemented. If feedback was not implemented, districts should provide a reasonable explanation. These additions will allow community members to monitor if, when, and how their input is being implemented, increasing accountability and trust between administrators, students, families, and staff.
- To ensure accountability with language access requirements and encourage the participation of diverse families, the LCAP should include an additional template prompt for districts to describe how they have addressed language access needs in their engagement efforts. In addition, language access laws should be cited in the LCAP template instructions.

### **Integrating Engagement with Differentiated Assistance**

- Meaningful engagement is particularly important to close opportunity and outcome gaps for students whom the districts are not serving well. Any district that is eligible for differentiated assistance<sup>27</sup> and/or required to include a specific goal in their LCAP<sup>28</sup> should include directly impacted students and families in any conversations and efforts with COEs to improve outcomes. Districts and their technical assistance providers should also consider engagement (or lack

<sup>27</sup> A district is eligible for differentiated assistance if one or more student subgroups (such as students with disabilities, Black students, foster youth, English learners, etc.) demonstrate a need for more support in two or more state priority areas (i.e. red on the graduation rate and red on suspension rate). The purpose of differentiated assistance is to improve student outcomes through the LCAP process, which includes deciding how to use resources provided through LCFF and other funding sources. For a list of districts currently in differentiated assistance, see CAL. DEPT. OF EDUC., *2022 LCFF Eligibility File Record Layout* (Feb. 2023), <https://www.cde.ca.gov/fg/aa/lc/documents/assistancestatus22.xlsx&sa=D&source=docs&ust=1675821149340942&usq=A0vVaw3cSLBnOFZMTOPHMciTus>.

<sup>28</sup> If a district is eligible for Differentiated Assistance for three or more consecutive years based on their failure to adequately serve the same student group(s), they are required to include a goal in the LCAP to improve performance of that student sub-group. For a list of districts that are required to include a goal for specific student subgroups, see CAL. DEPT. OF EDUC., *LEAs per Education Code 52064(e)(5)* (Dec. 2021), <https://www.cde.ca.gov/fg/aa/lc/documents/leasperc52064.xlsx&sa=D&source=docs&ust=1675821289886573&usq=A0vVaw2NLf35ksbpQKNrokWzUkVS>.



thereof) in their analysis of why the district is consistently failing to adequately support specific student groups. Any improvement plan that does not include directly impacted students and families is likely to fail. Thus, districts should also be required to provide targeted outreach and intensive engagement to the particular student subgroup(s) and families that meet the criteria for differentiated assistance. Districts should document these efforts in the LCAP under a new prompt in the engagement section.

### **Establishing Uniform Engagement Data**

- California has already identified parent and family engagement as a state priority, acknowledging how critical engagement is to school and student success. However, no state-level data is collected on engagement. Instead, accountability for engagement is left to districts, who independently report on their own performance without any involvement or oversight from their communities or COEs. The state must develop objective, comparable data based on students' and families' experiences with district engagement efforts rather than accepting districts' self-evaluations.

### **Empowering County Offices of Education to Monitor Engagement**

- Currently, there is no accountability system to ensure that districts are adhering to engagement requirements outside of the UCP complaint process. County offices of education should be empowered to monitor, intervene, and even reject LCAPs when districts fail to adhere to their statutory engagement requirements (such as publicly posting LCAP documents, holding public hearings, convening and holding regular meetings with PACs and DELACs, and meaningfully engaging with students, families, and staff).



## CONCLUSION

Ten years ago, the state of California committed to implementing a public school funding system that prioritized local control, transparency, community engagement, and, most importantly, equity. Recognizing historic disinvestments for certain student groups and communities, LCFF directed billions of dollars of additional resources to many of the students who need it most. In the ensuing years, LCFF has closed some opportunity gaps and encouraged thousands of community members to become more involved in school district decision-making. Through LCFF, communities have demanded – and school districts have implemented – community schools, mental health resources, ethnic studies, and a host of other critical programs.

LCFF was always meant to be a work in progress predicated on continuous improvement. It was a bold step in the right direction, but only the first one. The state must continue revising the system to ensure that it reaches its full potential. Accordingly, we hope that state and local leaders in education will incorporate the recommendations we provided in this report and refine the system to ensure that all students in California receive the resources they need and deserve.

# APPENDIX A: DISTRICTS REVIEWED

The twenty districts denoted with an asterisk (\*) were included in our in-depth review and analyses.

DISTRICT	COUNTY	BOARD ADOPTED LCAP	COE-APPROVED LCAP
Adelanto Elementary School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Alisal Union School District*	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Alta Loma School District	San Bernardino	No longer available online	<a href="#">COE Approved LCAP</a>
Alum Rock Union Elementary School District*	Santa Clara	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Anaheim Union High School District*	Orange	<a href="#">District Board Adopted LCAP</a> (starts p. 179)	<a href="#">COE Approved LCAP</a>
Antelope Valley Union High School District*	Los Angeles	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Apple Valley Unified School District	San Bernardino	<a href="#">District Board Adopted Budget Overview for Parents</a> <a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Baker Valley Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a> <a href="#">District Board Adopted Budget Overview for Parents</a> <a href="#">District Board Adopted Action Tables</a> <a href="#">District Board Adopted Annual Update Action Tables</a>	<a href="#">COE Approved LCAP</a>
Barstow Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Bear Valley Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Big Sur Unified School District	Monterey	Not found	<a href="#">COE Approved LCAP</a>
Bradley Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a> (starts p. 118)	<a href="#">COE Approved LCAP</a>
Carmel Unified School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Central School District	San Bernardino	<a href="#">District Board Adopted LCAP</a> (LCAP starts p. 14, BOP starts p. 126)	<a href="#">COE Approved LCAP</a>
Chaffey Joint Union High School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Chino Valley Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Chualar Union School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>

DISTRICT	COUNTY	BOARD ADOPTED LCAP	COE-APPROVED LCAP
Colton Joint Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Cucamonga School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Del Norte Unified School District*	Del Norte	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
East Side Union High School District*	Santa Clara	No longer available online	<a href="#">COE Approved LCAP</a>
Etiwanda School District	San Bernardino	<a href="#">District Board Adopted LCAP</a> (starts p. 27)	<a href="#">COE Approved LCAP</a>
Fontana Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Fresno Unified School District*	Fresno	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Gonzales Unified School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Graves Elementary School District	Monterey	Not found	<a href="#">COE Approved LCAP</a>
Greenfield Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Helendale School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Hesperia Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
King City Union School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Lagunita Elementary School District	Monterey	No longer available online	<a href="#">COE Approved LCAP</a>
Los Angeles Unified School District*	Los Angeles	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Long Beach Unified School District*	Los Angeles	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>

DISTRICT	COUNTY	BOARD ADOPTED LCAP	COE-APPROVED LCAP
Loleta Union Elementary School District*	Humboldt	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Lucerne Valley Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP (starts p. 32)</a>	<a href="#">COE Approved LCAP</a>
Mission Union Elementary School District	Monterey	Not found	<a href="#">COE Approved LCAP</a>
Monterey Peninsula Unified School District*	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Morongo Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Mountain View School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Mt. Baldy Joint School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Needles Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
North Monterey County Unified School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Oakland Unified School District*	Alameda	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Ontario-Montclair School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Oro Grande School District	San Bernardino	Not found	<a href="#">COE Approved LCAP</a>
Pacific Grove Unified School District	Monterey	<a href="#">District Board Adopted LCAP (starts p. 292)</a>	<a href="#">COE Approved LCAP</a>
Pomona Unified School District*	Los Angeles	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Redlands Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Rialto Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>

DISTRICT	COUNTY	BOARD ADOPTED LCAP	COE-APPROVED LCAP
Rim of the World Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Sacramento City Unified School District*	Sacramento	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Salinas City Elementary School District*	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Salinas Union High School District*	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
San Antonio Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
San Ardo Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
San Bernardino City Unified School District*	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
San Diego Unified School District*	San Diego	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
San Lucas Union Elementary School District	Monterey	Not found	<a href="#">COE Approved LCAP</a>
Santa Rita Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Saugus Union School District*	Los Angeles	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Silver Valley Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Snowline Joint Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Soledad Unified School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
South Monterey County Joint Union High School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Spreckels Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>



DISTRICT	COUNTY	BOARD ADOPTED LCAP	COE-APPROVED LCAP
Trona Joint Unified School District	San Bernardino	No longer available online	<a href="#">COE Approved LCAP</a>
Upland Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Victor Elementary School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Victor Valley Union High School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Washington Union Elementary School District	Monterey	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
West Contra Costa Unified School District*	Contra Costa	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>
Yucaipa-Calimesa Joint Unified School District	San Bernardino	<a href="#">District Board Adopted LCAP</a>	<a href="#">COE Approved LCAP</a>

# APPENDIX B: IMPLEMENTATION OF NEW CARRYOVER REQUIREMENT (2022-2023)

One asterisk (\*) indicates that carryover amounts were inconsistent between the district's Increased or Improved Services section and Action Tables.

Two asterisks (\*\*) indicate that carryover was calculated incorrectly in the district's LCAP and recalculated based on the information provided in their Carryover Table or Annual Update Tables.

DISTRICT	COUNTY	CARRYOVER IN DISTRICT BOARD-APPROVED LCAP	CARRYOVER IN COE-APPROVED LCAP
Adelanto Elementary School District	San Bernardino	\$7,274,198*	\$6,060,120
Alisal Union School District	Monterey	\$8,727,321	\$0
Alta Loma School District	San Bernardino	\$0	\$0
Alum Rock Union Elementary School District	Santa Clara	\$0	\$0
Anaheim Union High School District	Orange	\$2,696,298	\$2,696,298
Antelope Valley Union High School District	Los Angeles	\$6,957,507	\$7,180,234
Apple Valley Unified School District	San Bernardino	\$6,292,259*	\$5,927,561
Baker Valley Unified School District	San Bernardino	\$61,385	\$61,385
Barstow Unified School District	San Bernardino	\$3,998,895*	\$1,848,757
Bear Valley Unified School District	San Bernardino	\$104,352*	\$0
Big Sur Unified School District	Monterey	(LCAP not found)	\$0
Bradley Union Elementary School District	Monterey	\$0	\$0
Carmel Unified School District	Monterey	\$0	\$0
Central School District	San Bernardino	\$2,634,093	\$2,592,343
Chaffey Joint Union High School District	San Bernardino	\$0	\$0
Chino Valley Unified School District	San Bernardino	(Carryover information not provided)	\$0
Chualar Union School District	Monterey	\$1,023,822**	\$0
Colton Joint Unified School District	San Bernardino	\$0	\$0
Cucamonga School District	San Bernardino	\$302,058	\$0
Del Norte Unified School District	Del Norte	\$0	\$0
East Side Union High School District	Santa Clara	\$0	\$0

DISTRICT	COUNTY	CARRYOVER IN DISTRICT BOARD-APPROVED LCAP	CARRYOVER IN COE-APPROVED LCAP
Etiwanda School District	San Bernardino	\$0	\$0
Fontana Unified School District	San Bernardino	(Carryover information not provided)	\$0
Fresno Unified School District	Fresno	\$30,000,000	\$30,000,000
Gonzales Unified School District	Monterey	\$0	\$0
Graves Elementary School District	Monterey	(LCAP not found)	\$0
Greenfield Union Elementary School District	Monterey	\$4,044,340	\$4,044,340
Helendale School District	San Bernardino	\$0	\$0
Hesperia Unified School District	San Bernardino	\$21,804,471	\$21,804,471
King City Union School District	Monterey	\$0	\$0
Lagunita Elementary School District	Monterey	\$0	\$0
Loleta Union Elementary School District	Humboldt	\$0	\$0
Long Beach Unified School District	Los Angeles	(Carryover information not provided)	\$0
Los Angeles Unified School District	Los Angeles	\$214,524,479	\$214,524,479
Lucerne Valley Unified School District	San Bernardino	\$0	\$0
Mission Union Elementary School District	Monterey	(LCAP not found)	\$0
Monterey Peninsula Unified School District	Monterey	\$0	\$0
Morongo Unified School District	San Bernardino	\$6,645,370**	\$241,192
Mountain View School District	San Bernardino	\$0	\$0
Mt. Baldy Joint School District	San Bernardino	\$0	\$0
Needles Unified School District	San Bernardino	\$332,289	\$0*
North Monterey County Unified School District	Monterey	\$0**	\$0**
Oakland Unified School District	Alameda	\$17,296,053	\$17,296,053
Ontario-Montclair School District	San Bernardino	\$0	\$0
Oro Grande School District	San Bernardino	(LCAP not found)	\$14,344*
Pacific Grove Unified School District	Monterey	\$0	\$0
Pomona Unified School District	Los Angeles	\$15,885,985	\$15,885,985
Redlands Unified School District	San Bernardino	\$0	\$0
Rialto Unified School District	San Bernardino	\$9,631,725	\$9,631,725

DISTRICT	COUNTY	CARRYOVER IN DISTRICT BOARD-APPROVED LCAP	CARRYOVER IN COE-APPROVED LCAP
Rim of the World Unified School District	San Bernardino	\$0	\$0
Sacramento City Unified School District	Sacramento	\$6,875,281	\$6,875,281
Salinas City Elementary School District	Monterey	\$7,412,969**	\$3,950,108
Salinas Union High School District	Monterey	\$19,433,405**	\$15,405,610
San Antonio Union Elementary School District	Monterey	(Carryover information not provided)	\$0
San Ardo Union Elementary School District	Monterey	\$0	\$0
San Bernardino City Unified School District	San Bernardino	\$32,020,052	\$37,452,109
San Diego Unified School District	San Diego	\$0	\$0
San Lucas Union Elementary School District	Monterey	(LCAP not found)	\$0
Santa Rita Union Elementary School District	Monterey	\$0	\$0
Saugus Union School District	Los Angeles	\$1,156,954	\$1,156,954
Silver Valley Unified School District	San Bernardino	(Carryover information not provided)	\$0
Snowline Joint Unified School District	San Bernardino	\$1,624,633	\$0
Soledad Unified School District	Monterey	\$2,501,358**	\$2,612,272
South Monterey County Joint Union High School District	Monterey	\$979,969**	\$979,969**
Spreckels Union Elementary School District	Monterey	\$17,876**	\$0
Trona Joint Unified School District	San Bernardino	\$0	\$0
Upland Unified School District	San Bernardino	\$2,900,710	\$2,900,710
Victor Elementary School District	San Bernardino	\$7,556,758	\$7,555,692
Victor Valley Union High School District	San Bernardino	\$0	\$0
Washington Union Elementary School District	Monterey	(Carryover information not provided)	\$0
West Contra Costa Unified School District	Contra Costa	\$0	\$0
Yucaipa-Calimesa Joint Unified School District	San Bernardino	\$1,415,827**	\$1,414,868

# APPENDIX C: LCAPS & COMMUNITY SCHOOLS IMPLEMENTATION GRANTEEES

An asterisk (\*) denotes districts where we were unable to clearly identify a COE-approved LCAP. For these districts, we either used the most recent LCAP available on the districts' websites or excluded the district from our analysis.

DISTRICT	COUNTY	LCAP	DOES LCAP INCLUDE COMMUNITY SCHOOLS?	RELATED LCAP ACTION(S)	IMPLEMENTATION GRANT AMOUNT
Anaheim Elementary School District	Orange	<a href="#">COE-Approved LCAP</a>	No	None	\$2,850,000
Anaheim Union High School District	Orange	<a href="#">COE-Approved LCAP</a>	Yes, includes community schools action	Action 2.1: Increase parent engagement (\$8,903,000) Action 2.2: FACE Support for English Learners (\$2,333,000)	\$23,275,000
Azusa Unified School District	Los Angeles	<a href="#">COE-Approved LCAP</a>	Yes, includes reference to community schools	None	\$14,725,000
Bakersfield City School District	Kern	<a href="#">COE-Approved LCAP</a>	No	None	\$5,700,000
Buttonwillow Union Elementary School District	Kern	<a href="#">COE-Approved LCAP</a>	Yes, includes reference to community schools	None	\$1,187,500
Calistoga Joint Unified School District	Napa	<a href="#">COE-Approved LCAP</a>	Yes, includes community schools action	Action 2.1: Provide systems of support for the social-emotional and physical well-being of students (\$977,544)	\$2,612,500
Campbell Union School District	Santa Clara	<a href="#">COE-Approved LCAP</a>	Yes, includes reference to community schools	None	\$1,187,500
Centralia Elementary School District	Orange	<a href="#">COE-Approved LCAP</a>	Yes, includes reference to community schools	None	\$4,275,000
Compton Unified School District	Los Angeles	<a href="#">COE-Approved LCAP</a>	No	None	\$6,650,000
Delano Union Elementary School District	Kern	<a href="#">COE-Approved LCAP</a>	No	None	\$13,775,000

DISTRICT	COUNTY	LCAP	DOES LCAP INCLUDE COMMUNITY SCHOOLS?	RELATED LCAP ACTION(S)	IMPLEMENTATION GRANT AMOUNT
Edison Elementary School District	Kern	<a href="#">COE-Approved LCAP</a>	Yes, includes community schools action	Action 3.9: Hire Full-Time Community Services Coordinator (\$143,500)	\$2,850,000
El Nido Elementary School District*	Merced	<a href="#">District LCAP</a>	No	None	\$1,187,500
Eureka City Schools	Humboldt	<a href="#">COE-approved LCAP</a>	No	None	\$3,562,500
Firebaugh-Las Deltas Unified School District	Fresno	<a href="#">COE-approved LCAP</a>	No	None	\$5,700,000
Fortuna Elementary School District	Humboldt	<a href="#">COE-approved LCAP</a>	No	None	\$2,375,000
Fullerton Elementary School District	Orange	<a href="#">COE-approved LCAP</a>	Yes, includes reference to community schools	None	\$7,837,500
Guerneville Elementary School District	Sonoma	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.3: Community-Based Schools (\$1,181,639)	\$1,187,500
Hayward Unified School District	Alameda	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 2.1: Coordination of Services to Support the Whole Student (\$2,035,000)	\$19,475,000
Jurupa Unified School District	Riverside	<a href="#">COE-approved LCAP</a>	No	None	\$9,025,000
Kernville Union Elementary School District	Kern	<a href="#">COE-approved LCAP</a>	No	None	\$3,325,000
Lakeport Unified School District	Lake	LCAP not found	No	None	\$16,150,000
Lamont Elementary School District	Kern	<a href="#">COE-approved LCAP</a>	No	None	\$3,325,000
Loleta Union Elementary School District	Humboldt	<a href="#">COE-approved LCAP</a>	No	None	\$712,500
Los Angeles Unified School District	Los Angeles	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.9: Community Schools Initiative (\$9,704,257)	\$44,412,500
Lost Hills Union Elementary School District	Kern	<a href="#">COE-approved LCAP</a>	Yes, includes reference to community schools	None	\$9,500,000
Madera Unified School District*	Madera	<a href="#">District LCAP</a>	No	None	\$11,400,000

DISTRICT	COUNTY	LCAP	DOES LCAP INCLUDE COMMUNITY SCHOOLS?	RELATED LCAP ACTION(S)	IMPLEMENTATION GRANT AMOUNT
McFarland Unified School District	Kern	<a href="#">COE-approved LCAP</a>	No	None	\$7,125,000
Merced Union High School District*	Merced	<a href="#">District LCAP</a>	No	None	\$3,800,000
Napa Valley Unified School District*	Napa	<a href="#">District LCAP</a>	No	None	\$5,225,000
Oakland Unified School District	Alameda	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.1: Positive School Culture & Climate (\$17,006,089)	\$66,737,500
Oceanside Unified School District	San Diego	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.10: Community Schools (\$450,000)	\$8,312,500
Ontario-Montclair School District	San Bernardino	<a href="#">COE-approved LCAP</a>	No	None	\$39,662,500
Orange Unified School District*	Orange	<a href="#">District LCAP</a>	No	None	\$15,200,000
Pasadena Unified School District	Los Angeles	<a href="#">COE-approved LCAP</a>	Yes, includes reference to community schools	None	\$9,737,500
Pittsburg Unified School District*	Contra Costa	<a href="#">District LCAP</a>	Yes, includes community schools action	Action 3.4: Full Service Community School Initiative (\$295,916)	\$2,850,000
Ravenswood City Elementary School District	San Mateo	<a href="#">COE-approved LCAP</a>	No	None	\$4,987,500
Reef-Sunset Unified School District	Kings	<a href="#">COE-approved LCAP</a>	No	None	\$2,612,500
Sacramento City Unified School District	Sacramento	<a href="#">COE-approved LCAP</a>	No	None	\$9,500,000
San Diego Unified School District	San Diego	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 1.4.f: Expand Wellness Services/ Opportunities for Children, Youth & Adults by Establishing Community Schools (\$13,438,212)	\$12,825,000
San Francisco Unified School District*	San Francisco	<a href="#">District LCAP</a>	Yes, includes reference to community schools	None	\$33,725,000
San Lorenzo Unified School District	Alameda	<a href="#">COE-approved LCAP</a>	No	None	\$4,512,500
Sanger Unified School District	Fresno	<a href="#">COE-approved LCAP</a>	No	None	\$8,787,500

DISTRICT	COUNTY	LCAP	DOES LCAP INCLUDE COMMUNITY SCHOOLS?	RELATED LCAP ACTION(S)	IMPLEMENTATION GRANT AMOUNT
Santa Ana Unified School District	Orange	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 2.2: School-based Community Wellness Centers ( \$700,121) Action 3.3: Wellness Network of Support ( \$10,514,810)	\$5,700,000
Sausalito Marin City School District*	Marin	<a href="#">District LCAP</a>	Yes, includes community schools action	Action 4.1: Provide Community School Leadership (\$134,057)	\$712,500
Southern Kern Unified School District	Kern	<a href="#">COE-approved LCAP</a>	Yes, includes reference to community schools	None	\$7,125,000
Standard Elementary School District	Kern	<a href="#">COE-approved LCAP</a>	No	None	\$5,700,000
Vallecitos Elementary School District	San Diego	<a href="#">COE-approved LCAP</a>	No	None	\$1,187,500
Vista Unified School District	San Diego	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.11: Community School Program (\$630,000)	\$6,175,000
West Contra Costa Unified School District	Contra Costa	<a href="#">COE-approved LCAP</a>	Yes, includes community schools action	Action 3.6: Full Service Community Schools (\$2,054,231)	\$29,450,000
Wheatland Union High School District*	Yuba	<a href="#">District LCAP</a>	Yes, includes community schools action	Action 1.1: Increase Certificated Staff (includes Director of Community Schools) (\$986,165) Action 1.2: Increase Classified Staff (includes Community Schools Coordinator) (\$725,770) Action 1.6: College Going Culture (includes parent institutes planned with CCSPP grant) (\$40,000)	\$2,612,500

## ENDNOTES

- I** See Joonho Lee, Bruce Fuller, and Sophia Rabe-Hesketh, *How Finance Reform May Alter Teacher and School Quality: California’s \$23 Billion Initiative*, 58 AM. EDUC. RSCH. J., 1225-1269 (2021); Julien Lafortune, *Targeted K-12 Funding and Student Outcomes: Evaluating the Local Control Funding Formula*, PUB. POL’Y INST. OF CAL. (Oct. 2021), <https://www.ppic.org/publication/targeted-k-12-funding-and-student-outcomes/>; Carrie Hahnel and Daniel C. Humphrey, *What’s Next for the Local Control Funding Formula?*, POL’Y ANALYSIS FOR CAL. EDUC. (Nov. 2021), [https://edpolicyinca.org/sites/default/files/2021-11/r\\_hahnel\\_nov21.pdf](https://edpolicyinca.org/sites/default/files/2021-11/r_hahnel_nov21.pdf).
- II** We identified similar concerns in 2016. See Angelica K. Jongco, *Keeping the Promise of LCFF: Key Findings and Recommendations After Two Years of LCFF Implementation*, PUB. ADOCS. (Apr. 2016).
- III** For a full history on the passage of the LCFF, see Roberta C. Furger, Laura E. Hernández, and Linda Darling-Hammond, *The California Way: The Golden State’s Quest to Build an Equitable and Excellent Education System*, LEARNING POL’Y INST. 4-21 (Sep. 23, 2019), <https://learningpolicyinstitute.org/media/367/download?inline&file=California Way Equitable Excellent Education System REPORT.pdf>.
- IV** *Introduction to the Local Control Funding Formula*, CAL. DEPT. OF EDUC. (Nov. 30, 2021), <https://www.cde.ca.gov/fg/aa/lc/documents/tues2introlcff113021.pptx>.
- V** Julien Lafortune and Joseph Herrera, *Financing California’s Public Schools*, PUB. POL’Y INST. OF CAL. (Sep. 2022), <https://www.ppic.org/publication/financing-californias-public-schools/>.
- VI** For earlier reports on LCFF implementation, see Angelica K. Jongco, *Keeping the Promise of LCFF: Key Findings and Recommendations After Two Years of LCFF Implementation*, PUB. ADOCS. (Apr. 2016), [https://www.publicadvocates.org/wp-content/uploads/report\\_public\\_advocates\\_keeping\\_the\\_promise\\_of\\_lcff.pdf](https://www.publicadvocates.org/wp-content/uploads/report_public_advocates_keeping_the_promise_of_lcff.pdf); Roxanne H. Alejandre & Rigel S. Mossaro, *Keeping the Promise of LCFF: In Districts Serving Less than 55% High-Need Students*, PUB. ADOCS. (May 2016), [https://www.publicadvocates.org/wp-content/uploads/non-concentrated\\_district\\_report\\_UPDATED.pdf](https://www.publicadvocates.org/wp-content/uploads/non-concentrated_district_report_UPDATED.pdf); and Nicole Gon Ochi, Victor Leung, Ariana Rodriguez, et al., *Our Right to Resources: School Districts are Cheating High-Need Students by Funding Law Enforcement* (ACLU of S. Cal., Los Angeles, CA), 24-32, last accessed Jan. 19, 2023, [https://publicadvocates.org/wp-content/uploads/our-right-to-resources\\_final1.pdf](https://publicadvocates.org/wp-content/uploads/our-right-to-resources_final1.pdf).
- VII** 5 Cal. Code of Regs. Tit. 5 § 15496(a).
- VIII** *Local Control and Accountability Plan Instructions*, CAL. DEPT. OF EDUC. 15 (accessed Jan. 11, 2023), <https://www.cde.ca.gov/re/lc/documents/adoptedlcaptemplate.docx> [hereinafter *2022-2023 LCAP Template Instructions*].
- IX** Cal. Educ. Code § 42238.07 (2013); [2022-2023 LCAP Template Instructions](#) at 12-13.
- X** Cal. Educ. Code § 52060(g) (2018); *Stakeholder Engagement Requirements Under the Local Control Funding Formula*, PUB. ADOCS. & S. CAL. ACLU (2016), <https://www.publicadvocates.org/wp-content/uploads/ACLU-PA-Stakeholder-Engagement-Requirements.pdf>.
- XI** Cal. Educ. Code §§ 52063(a)-(b) (2019) (amended 2022).
- XII** See Cal. Educ. Code § 52064(b)(1) (requiring the LCAP template to include “[a] description of the annual goals, for all pupils and each subgroup of pupils identified pursuant to Section 52052, to be achieved for each of the state priorities . . .”); § 52052(a)(2)(A) (defining “numerically significant pupil subgroups” to include ethnic subgroups).
- XIII** Cal. Educ. Code § 52062 (2018).
- XIV** Cal. Educ. Code § 52060(b) (2020).
- XV** Cal. Educ. Code § 52070(d) (2021).
- XVI** Cal. Educ. Code § 52065 (2022).
- XVII** Big Sur Unified School District, Graves Elementary School District, Mission Union Elementary School District, Oro Grande School District, and San Lucas Union Elementary School District.
- XVIII** Barstow Unified School District, Rim of the World Unified School District, and San Antonio Union Elementary School District.
- XIX** For more on the Budget Overview for Parents, see *How to Read the LCFF Budget Overview for Parents*, PUB. ADOCS. (last accessed Jan. 25, 2023), <https://www.publicadvocates.org/wp-content/uploads/2021/05/eng-how-to-read-the-budget-overview-for-parents-1.pdf>.
- XX** Rialto Unified School District.
- XXI** Lagunita Elementary School District.

- XXII** Fresno Unified School District.
- XXIII** [2022-2023 Salinas City Elementary School District LCAP](#) at 52.
- XXIV** [2022-2023 King City Union School District LCAP](#) at 193-199, 229-230.
- XXV** [2022-2023 LCAP Template Instructions](#) at 17.
- XXVI** [2022-2023 Anaheim Union High School District LCAP](#) at 45.
- XXVII** [2022-2023 San Bernardino City Unified School District LCAP](#) at 42, 73, 101.
- XXVIII** [2022-2023 Salinas City Elementary School District LCAP](#) at 53 (Action 2.16); [2022-2023 King City Union School District LCAP](#) at 23 (Action 1.1.1).
- XXIX** Compare the district board-approved [2022-2023 Chino Valley Unified School District LCAP](#) at 57, 118 with the COE-approved [2022-2023 Chino Valley Unified School District LCAP](#) at 57, 116; compare the district-board approved [2022-2023 Rialto Unified School District LCAP](#) at 83 with the COE-approved [2022-2023 Rialto Unified School District LCAP](#) at 84.
- XXX** See also Cal. Dept. of Edu. Decision re: San Bernardino County Office of Education (June 18, 2021) at 9 (on file with Pub. Advoc.), [https://www.publicadvocates.org/wp-content/uploads/2021/11/6.18.21\\_2021-01259-final\\_cde-decision-sbcoe.pdf](https://www.publicadvocates.org/wp-content/uploads/2021/11/6.18.21_2021-01259-final_cde-decision-sbcoe.pdf).
- XXXI** See Nicole Gon Ochi, Victor Leung, Ariana Rodriguez, et al., *Our Right to Resources: School Districts are Cheating High-Need Students by Funding Law Enforcement* (ACLU of S. Cal., Los Angeles, CA), 24-32, last accessed Jan. 19, 2023, [https://publicadvocates.org/wp-content/uploads/our-right-to-resources\\_final1.pdf](https://publicadvocates.org/wp-content/uploads/our-right-to-resources_final1.pdf).
- XXXII** Furger, et al., *The California Way: The Golden State’s Quest to Build an Equitable and Excellent Education System*, LEARNING POLY INST. (Feb. 21, 2019), <https://learningpolicyinstitute.org/product/california-way-equitable-excellent-education-system-report>.
- XXXIII** See Cal. Educ. Code § 52064(e).
- XXXIV** To determine the percentage of the district’s budget in the LCAP, we divided the “total budgeted expenditures in the LCAP” by the “total revenue projected”. Both of these numbers are found in the Budget Overview for Parents. Note that the amounts for “total budgeted expenditures in the LCAP” were not always consistent across districts’ Budget Overview for Parents and their Action Tables.
- XXXV** [2022-2023 Guerneville School District LCAP](#) at 47-48 (Action 3.3).
- XXXVI** [2022-2023 Sausalito Marin City School District LCAP](#) at 40 (Goal 4).
- XXXVII** [Long Beach Unified School District 2022-2023 Learning Acceleration and Support Plan](#) at 7.
- XXXVIII** [2022-2023 Long Beach Unified School District LCAP](#) at 48.
- XXXIX** [2022-2023 Anaheim Union High School District LCAP](#) at 28, 33, 38.
- XL** See Cal. Dept. of Edu. Decision re: L.A. Unified Sch. Dist. (July 30, 2020) at 18, [https://www.publicadvocates.org/wp-content/uploads/2020/08/2020\\_07\\_30\\_cde-decision\\_laUSD.pdf](https://www.publicadvocates.org/wp-content/uploads/2020/08/2020_07_30_cde-decision_laUSD.pdf). (2020 CDE Decision re: LAUSD).
- XLI** Magaly Lavadenz, Alvira G. Armas, and Sylvia Jáuregui Hodge. *In Search of Equity for English Learners: A Review of the 2021-2024 Local Control and Accountability Plans (LCAPs)*, 25-26. CALIFORNIANS TOGETHER, 2022. Accessed January 12, 2023, <https://californiantogether.org/wp-content/uploads/2022/09/21024-LCAP-2022-Report-FINAL.pdf>; see also [2022-2023 LCAP Template Instructions](#) at 11 (requiring LEAs that have a numerically significant English learner student subgroup to include “specific actions in the LCAP related to, at a minimum...professional development activities specific to English Learners”).
- XLII** See 2020 CDE Decision re: LAUSD at 15, [https://publicadvocates.org/wp-content/uploads/2020/08/2020\\_07\\_30\\_cde-decision\\_laUSD.pdf](https://publicadvocates.org/wp-content/uploads/2020/08/2020_07_30_cde-decision_laUSD.pdf).
- XLIII** [2022-2023 Alum Rock Union Elementary School District LCAP](#) at 60.
- XLIV** [2022-2023 Long Beach Unified School District LCAP](#) at 33, 35, 72.
- XLV** [2022-2023 Long Beach Unified School District LCAP](#) at 72.
- XLVI** [2022-2023 San Bernardino City Unified School District LCAP](#) at 48.
- XLVII** See *Local Control and Accountability Plan: SENI Documents*, LOS ANGELES UNIFIED SCHOOL DISTRICT (last visited Jan. 19, 2023), <https://achieve.lausd.net/Page/17238>.
- XLVIII** [2022-2023 Los Angeles Unified School District LCAP](#) at 78-80, 161-164, 242-244, 273-275, 299-301, 403-411. See also *SENI Funds for 2022-23: 2022-23 TSP Plans*, LOS ANGELES UNIFIED SCHOOL DISTRICT (last visited Feb. 6, 2023).

- XLIX** *Local Control and Accountability Plan*, SACRAMENTO CITY UNIFIED SCHOOL DISTRICT, <https://www.scusd.edu/local-control-and-accountability-plan-lcap-resources> (last visited Jan. 12, 2023).
- L** [2022-2023 Sacramento City Unified School District LCAP](#) at 73, 98-99, 120, 134, 146.
- LI** [2022-2023 LCAP Template Instructions](#) at 1 (defining comprehensive strategic planning).
- LII** Cal. Educ. Code § 52063 (2023).
- LIH** Cal. Educ. Code § 52060(g) (2020).
- LIV** Cal. Educ. Code § 52062 (2018).
- LV** [2022-2023 San Diego Unified School District LCAP](#) at 24.
- LVI** [2022-2023 Sacramento City Unified School District LCAP](#) at 42-43.
- LVII** [2022-2023 Pomona Unified School District LCAP](#) at 6-7.
- LVIII** [2022-2023 East Side Union High School District LCAP](#) at 11-12.
- LIX** [2022-2023 Salinas Union High School District LCAP](#) at 22.
- LX** [2022-2023 Salinas Union High School District LCAP](#) at 21.
- LXI** *Id.*
- LXII** [2022-2023 Los Angeles Unified School District LCAP](#) at 28.
- LXIII** [2022-2023 Long Beach Unified School District LCAP](#) at 27.
- LXIV** [2022-2023 Fresno Unified School District LCAP](#) at 3.
- LXV** [2022-2023 Sacramento City Unified School District LCAP](#) at 43.
- LXVI** Bear Valley Unified School District, Big Sur Unified School District, Chaffey Joint Union High School District, Graves Elementary School District, Helendale School District, Lucerne Valley Unified School District, and Oro Grande School District.
- LXVII** Cal. Govt. Code § 54957.5.
- LXVIII** Cal. Educ. Code § 52070(c).
- LXIX** 2022-2023 Oakland Unified School District LCAP at 30-31.
- LXX** *Id.* at 34-35, 38-40, 44.
- LXXI** 2022-2023 Los Angeles Unified School District LCAP at 30-31.
- LXXII** 2022-2023 San Diego Unified School District LCAP at 22-23.
- LXXIII** 2022-2023 Del Norte Unified School District LCAP at 22-23.
- LXXIV** [2022-2023 Sacramento Unified School District LCAP](#) at 44, 47, 50.
- LXXV** Compare Action 4.4 in the 2022-2023 Total Expenditures Table with the same action in the 2021-2022 Annual Update Table in the [2022-2023 Sacramento Unified School District LCAP](#).
- LXXVI** [2022-2023 Pomona Unified School District LCAP](#) at 8.
- LXXVII** *Id.* at 7-8.
- LXXVIII** [2022-2023 Anaheim Union High School District LCAP](#) at 21, 48, 52.
- LXXIX** [2022-2023 Anaheim Union High School District LCAP](#) at 44.
- LXXX** [2022-2023 Los Angeles Unified School District LCAP](#) at 357-378.
- LXXXI** See Community Engagement Initiative, *Background*, <https://californiaengage.org/about/#background> (last visited Feb. 7, 2023).
- LXXXII** See Karen L. Mapp, et al., *Everyone Wins!: The Evidence for Family-School Partnerships and Implications for Practices* (2022). See also Dr. Eyal Bergaman, [Unlocking the “How:” Designing Family Engagement Strategies that Lead to School Success](#), *LEARNING HEROES* (Mar. 2022); Public Advocates, et al., [Best Practices in Local Control Funding Formula Implementation: Developing a Culture of Authentic Parent Engagement and Shared Decision-making](#) (last accessed Feb. 7, 2023).
- LXXXIII** For CDE’s self-reflection engagement tool, see CAL. DEPT. OF EDUC., *Local Control Funding Formula (LCFF) Priority 3 Self-Reflections Tool* (Jan. 2022), <https://www.cde.ca.gov/ta/ac/cm/documents/pri3selfreftools2022.docx&sa=D&source=docs&ust=1675821544779247&usg=AOvVaw0Blnj-7kqnOI2SLIzF6Ye2>.