Review of School Districts' 2014-15 Local Control and Accountability Plans

LAO

EXECUTIVE SUMMARY

New System of School Funding, Support, and Intervention Recently Established. The *2013-14 Budget Act* and associated legislation created a new school funding formula—the Local Control Funding Formula (LCFF). The LCFF provides districts with base funding tied to four grade spans; supplemental funding for English learner, low-income, and foster youth (EL/LI) students; and concentration funding for districts with relatively high proportions of EL/LI students. The legislation also created a new system of planning and support. The new plans—called Local Control Accountability Plans (LCAPs)—require districts to set goals and describe the actions they plan to take to achieve those goals. The plans also require districts to describe the enhanced services they will provide to support EL/LI students given the higher funding rates provided for them. The new system of support is centered around performance evaluations, known as rubrics, that are intended to assess districts' performance and guide county offices of education, the California Collaborative for Educational Excellence (a newly authorized network of educational specialists), and the Superintendent of Public Instruction in providing assistance when districts fail to improve.

Report Reviews First Year of LCAP Development, Assesses Usefulness of New Plans. This report examines 50 LCAPs to evaluate their compliance with statutory requirements and determine whether LCAPs overall reflected thoughtful strategic planning by districts. To select 39 of the districts for our sample, we created categories of large, mid-size, and small districts based on total enrollment and then, within each of these size categories, we selected some districts that had high, average, and low EL/LI enrollment. We added the state's 11 largest districts to round out our sample. Our sample contains districts from many geographic areas of the state.

Findings and Assessment

Statute Sets Ambitious Requirements for LCAPs. One of our most significant findings relates to the overarching design of the LCAP. The statute governing the components of the LCAP requires districts to set goals in eight state priority areas, identify and describe actions to reach those goals, and track progress using 24 state-identified metrics (plus any local metrics). In addition, the statute instructs districts to set specific goals and identify actions for 12 student subgroups and each of the districts' schools for all the priority areas. Fulfilling all of these requirements is a challenging undertaking for districts to accomplish and accomplish well. Though most of the LCAPs we reviewed attempted to comply with many of the statutory LCAP requirements, none complied with every statutory requirement.

Districts Rarely Differentiate Between New and Ongoing Actions. In most LCAPs, we found that districts are not distinguishing between actions that are a continuation of efforts from the prior year and those that are new for the upcoming school year. Without such differentiation, we could not determine whether districts were using the new funding generated under LCFF to pursue new actions to improve performance or to continue or expand prior activities.

Districts Often Fail To Provide Sufficient Information on EL/LI Student Services. Often, districts' descriptions of services for EL/LI students consist only of recapping the actions they

will pursue on behalf of all students and indicating those actions also will benefit EL/LI students. In addition, few districts provide clear or compelling rationales for using their supplemental and concentration funds on a districtwide and schoolwide basis.

Recommendations

Emphasize Clear, Strategic Plans Over Detailed, Comprehensive Plans. Despite the complexity of the LCAP requirements, we believe the LCAP can be a useful tool for helping districts develop strategic plans. To help ensure that LCAPs can evolve into meaningful plans, we recommend the Legislature allow all districts to focus their plans on their highest-priority areas rather than require them to address all eight state-specified priority areas. For the smaller set of high-priority areas, we recommend the Legislature continue to require districts to identify the actions they plan to take to improve their performance and track their outcomes. To ensure districts address areas of poor performance, we recommend the Legislature require districts to include in their LCAPs their most critical areas in need of improvement, as identified by the evaluation rubrics. While moving from comprehensive to focused plans would reduce the amount of information available in districts' LCAPs, the evaluation rubrics will provide comprehensive assessments of districts' performance across all priority areas, metrics, and subgroups. Moreover, most of the metrics currently required in the LCAP are publicly available through the state's existing data systems.

Require Districts To Indicate Whether Actions Are New or Ongoing. For any priority areas contained in a particular LCAP, we recommend the Legislature require the district to distinguish between new and ongoing actions. This distinction will provide clarity on where districts are making new investments and help identify which particular strategies may be affecting student outcomes.

Monitor Quality of Information Regarding EL/LI Students. We encourage the Legislature to monitor districts' EL/LI information over the next few years to determine if districts' descriptions of EL/LI services improve. To this end, we recommend the Legislature conduct an informational hearing during fall 2016 to solicit feedback from school districts, county offices of education, and community groups about the quality of this information. In the meantime, we recommend the Legislature enact several more modest changes to statute to improve the quality of information districts provide.

Disseminate Information on Key Ingredients of Effective Strategic Plans. We recommend the Legislature direct the California Department of Education to disseminate examples of model LCAPs to districts. These model LCAPs could help guide districts in developing more thoughtful plans in the years to come.

INTRODUCTION

This report reviews first-year Local Control and Accountability Plans (LCAPs) to evaluate their compliance with statutory requirements and determine whether the plans are a useful approach for improving school districts' performance. First, we discuss the development of the Local Control Funding Formula (LCFF), LCAPs, and the new system of school district support and intervention. Second, we describe our method for selecting and analyzing a sample of 50 LCAPs. Third, we lay out our findings and assessment of the LCAPs we reviewed. Lastly, we provide recommendations for adjustments to the LCAP to enhance its role as a strategic planning tool for districts.

BACKGROUND

New Funding Formula Based on Student Characteristics. Legislation enacted in 2013-14 made major changes to the way the state allocates funding to school districts. Previously, more than 40 state categorical programs constrained districts' spending choices—providing restricted state dollars that districts could use for only certain activities. By enacting LCFF, the state replaced the historical revenue limit and categorical funding system with a student-oriented, formula-based funding system. As displayed in Figure 1, the LCFF provides districts with base funding tied to four grade spans; supplemental funding for English learner, low-income, and foster youth (EL/LI) students; and concentration funding for districts with relatively high proportions of EL/LI students. Under the LCFF model, districts serving the same number of students in the same grade spans with the same characteristics receive the same amount of funding.

New System To Improve Student Outcomes. In conjunction with establishing the new funding formula, the state adopted a new system of support and intervention for school districts. The new system is founded on annual plans and performance evaluations, known as rubrics. The plans—the LCAPs—require districts annually to develop and adopt three-year plans to improve student achievement. The evaluation rubrics allow districts, county offices of education (COEs), and the Superintendent of Public Instruction to assess districts' progress towards improving student outcomes. Under the new system, districts then use those assessments to guide future plans and actions. Figure 2 (see next page) reflects the iterative improvement process underlying the new system.

Figure 1

Per-Student Funding Under LCFF

Grade Spans	Base Rates[a]	Supplemental Funding[b]	Concentration Funding[c]
K-3	$7,741	$1,548	$3,870
4-6	7,116	1,423	3,558
7-8	7,328	1,466	3,664
9-12	8,711	1,742	4,356

[a] Reflect 2014-15 target rates. These target rates are adjusted annually by the K-12 inflationary index. We estimate that on average the state funded 80 percent of these rates in 2014-15.

[b] Equals 20 percent of the associated grade-span base rate. Applies to all English learner, low-income, and foster youth (EL/LI) students.

[c] Equals 50 percent of the associated grade-span base rate. Applies to districts in which EL/LI enrollment is above 55 percent of total enrollment. Only generated by students above the threshold.

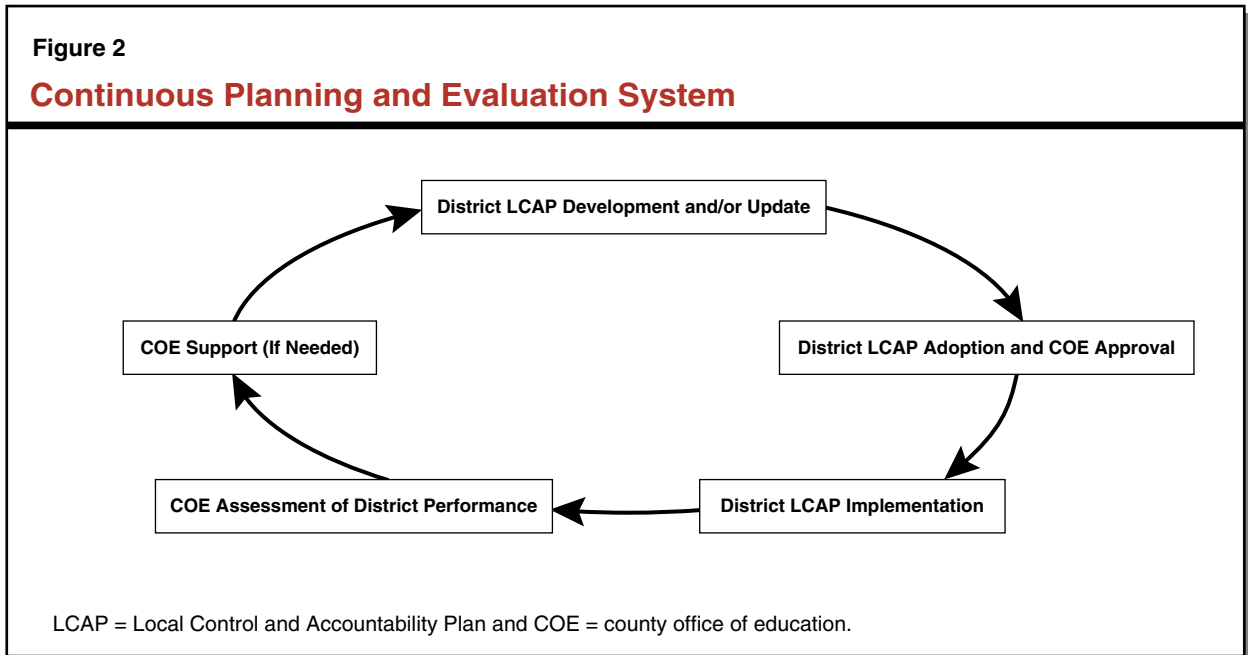LCFF = Local Control Funding Formula.

State Requires Districts to Develop Plans

Statute Requires Districts To Set Goals and Identify Related Actions and Funding. The legislation enacting LCFF laid out the framework for LCAPs. The framework is centered around districts' goals and the process for districts to develop and adopt those three-year plans. Specifically, statute requires districts to set goals and to describe the actions they plan to take to achieve those goals. Statute further requires districts to identify the associated funding supporting each planned action and align their LCAPs with their budgets to demonstrate that sufficient funding is allocated to support all of the planned actions. (For example, a school district could specify that it intends to provide tutors to all EL students below grade level to improve its reclassification rate. To ensure the LCAP and adopted budget are aligned, the school district must include sufficient funding for tutors in its adopted budget.)

Statute Establishes Eight Priority Areas and 24 Performance Indicators. For each goal a district sets, statute requires that districts align the goal with one or more of eight state priority areas. As shown in Figure 3, the priority areas span from student achievement and engagement to parental involvement and basic services (such as teachers and textbooks). For each state priority area, statute specifies certain performance indicators intended to monitor districts' performance. Statute lists a total of 24 performance metrics (see Figure 3). The priority area with the greatest number of associated performance metrics (8 of the 24) is the student achievement area. Metrics in this area include student performance on standardized tests, English Learner reclassification rates, and the share of students that pass Advanced Placement exams with a score of 3 or higher. In addition to addressing the state priority areas, statute allows districts' LCAPs to include locally developed metrics.

Statute Requires Districts To Establish Performance Targets. For each of the 24 performance metrics and any locally developed metrics, statute requires districts to establish performance targets for all students and student subgroups and schools. (Statute identifies 12 student subgroups—eight student racial and

Figure 2

Continuous Planning and Evaluation System

District LCAP Development and/or Update

District LCAP Adoption and COE Approval

District LCAP Implementation

COE Assessment of District Performance

COE Support (If Needed)

LCAP = Local Control and Accountability Plan and COE = county office of education.
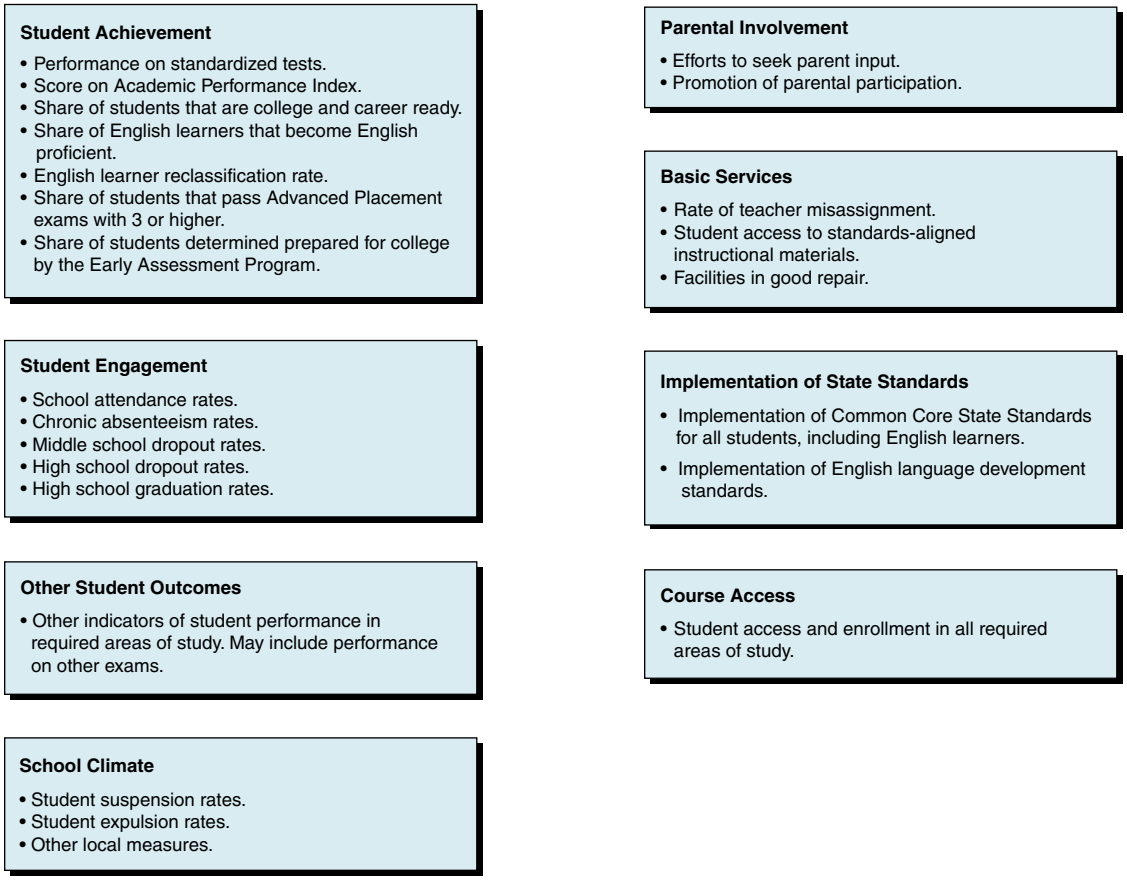
ethnic groups as well as English Learners, low-income students, foster youth, and students with disabilities.) Statute requires that districts establish these targets for the coming school year as well as the next two years. Figure 4 (see next page) provides a simplified illustration of the relationship among goals, priority areas, actions, metrics, and targets.

Statute and Regulations Contain Additional Set of Requirements for EL/LI Services. Statute specifies that a district must "increase or improve services" for EL/LI students "in proportion to the increase" in its LCFF supplemental and concentration funding. Statute also allows

districts to use supplemental and concentration funding on a districtwide or schoolwide basis. Statute directs the State Board of Education (SBE) to develop regulations implementing these provisions. Regulations allow districts to reflect their increase or improvement in services in various ways. Districts demonstrate adherence with the regulations through their LCAPs. In their LCAPs, districts must report the total amount of supplemental and concentration funding they expect to receive. They also must report the result of a complicated formula known as the "minimum proportionality percentage." This formula is intended to link the proportional increase in

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Figure 3

The Eight State Priority Areas and Associated Metrics

Student Achievement

• Performance on standardized tests.
• Score on Academic Performance Index.
• Share of students that are college and career ready.
• Share of English learners that become English proficient.
• English learner reclassification rate.
• Share of students that pass Advanced Placement exams with 3 or higher.
• Share of students determined prepared for college by the Early Assessment Program.

Student Engagement

• School attendance rates.
• Chronic absenteeism rates.
• Middle school dropout rates.
• High school dropout rates.
• High school graduation rates.

Other Student Outcomes

• Other indicators of student performance in required areas of study. May include performance on other exams.

School Climate

• Student suspension rates.
• Student expulsion rates.
• Other local measures.

Parental Involvement

• Efforts to seek parent input.
• Promotion of parental participation.

Basic Services

• Rate of teacher misassignment.
• Student access to standards-aligned instructional materials.
• Facilities in good repair.

Implementation of State Standards

• Implementation of Common Core State Standards for all students, including English learners.
• Implementation of English language development standards.

Course Access

• Student access and enrollment in all required areas of study.

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funding with the proportional increase in services, but it does not explicitly require a certain level of EL/LI spending. In addition, districts must describe how they plan to use their supplemental and concentration funding for the benefit of EL/LI students. Districts' LCAPs also must contain justifications if supplemental and concentration funding is not targeted to services specifically for EL/LI students, with higher justification for those with low shares of EL/LI students.

Districts Must Use LCAP Template Created by SBE. Statute creating the LCAP directed SBE to develop an LCAP template. The template is designed to cover all the statutory LCAP elements (goals, actions, funding, alignment with priority areas, performance indicators, and targets) and create some consistency across districts' LCAPs. The template contains some guidance for districts on how to develop their plans but does not prescribe any particular actions districts must take. The template provides space for districts to differentiate between services for all students and those for EL/LI students. The first iteration of the LCAP template was created in the spring of 2014 for LCAPs covering the 2014-15 school year.

For the 2015-16 LCAPs, the SBE adopted an updated template.

Districts Required To Solicit Input From Stakeholders in Developing LCAPs. The LCAP legislation also laid out the process by which districts were to develop and adopt their plans. Statute requires that districts involve various local community groups in plan development. Specifically, statute requires that districts consult with teachers, principals, administrators, parents, and students to determine what strategies they believe will improve student outcomes. Districts have some flexibility in determining how best to engage these groups. To ensure parents are involved in the LCAP process, statute requires that districts present the LCAP to the district parent advisory committee and the English learner parent advisory committee (if applicable). In addition, the district must provide the opportunity for public comment on the plan and hold at least one public hearing to solicit recommendations and comments from members of the public. School districts' boards must approve their LCAPs annually by July 1. Boards approved their first round of LCAPs by July 1, 2014.

Figure 4

Simplified Illustration of Goals, Priority Areas, Actions, Metrics, and Targets
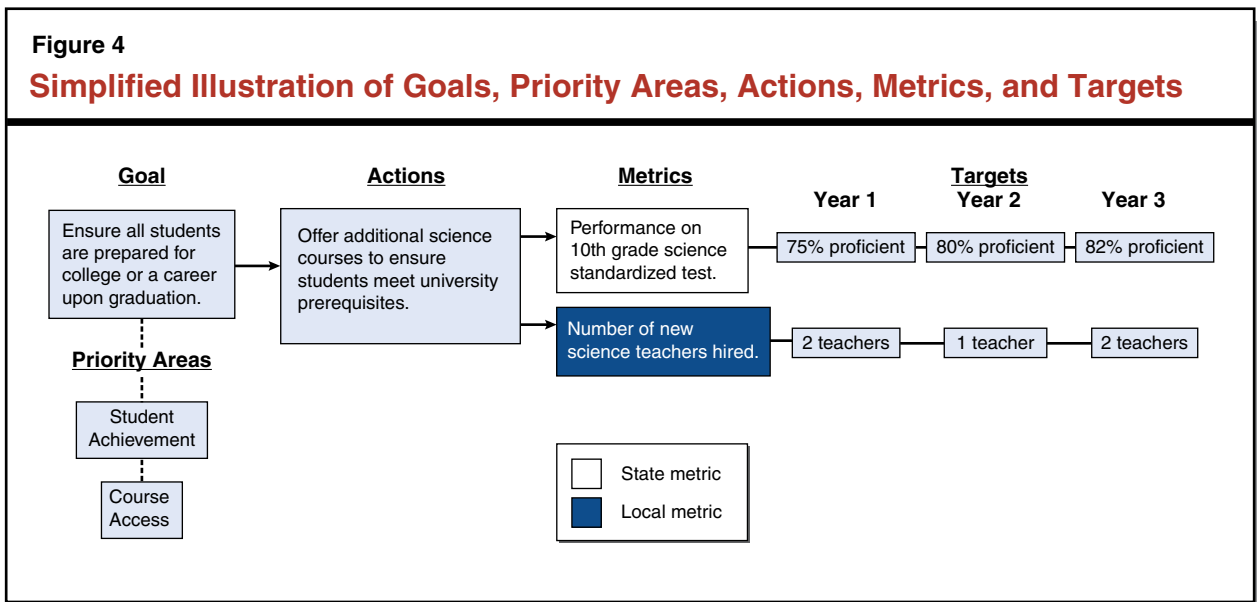
COEs Must Review District Plans and May Suggest Changes

COEs Can Ask for Clarification and Make Recommendations To Improve Districts' Plans. Each district must submit its LCAP to its COE for review. The COE can then seek clarification from the district about the contents of its LCAP. If a COE seeks such clarification, a district must respond in writing. Based on a district's response, the COE can submit recommendations for amendments to the LCAP back to the district. The district must consider any COE recommendations at a public hearing, but the district is not required to make changes to its plan. The COE must approve a district's LCAP if it determines that (1) the LCAP adheres to the SBE template, (2) the district's budgeted expenditures are sufficient to implement the strategies outlined in the LCAP, and (3) the LCAP adheres to the expenditure requirements for supplemental and concentration funding. Districts and COEs went through the first LCAP review process in the summer of 2014. The annual deadline for approval or rejection of a district's LCAP by a COE is October 8. For the 2014-15 school year, COEs approved the vast majority of LCAPs submitted by districts by the deadline. Our understanding is a handful of districts required technical support from COEs in order to have their LCAPs approved.

SBE Developing Criteria for Identifying Struggling Districts

Struggling Districts To Be Identified and Supported. The SBE is developing rubrics to evaluate districts' performance. The evaluation rubrics will serve two functions—allow districts to evaluate their strengths and weaknesses and allow COEs and the Superintendent of Public Instruction to gauge whether districts are improving outcomes for students. The rubrics are to be comprehensive and consider multiple measures of district and school performance. In addition, statute requires the rubrics to set state-level expectations for improvement in each of the eight state priority areas. These expectations are the basis for determining whether districts require support or intervention from COEs, the California Collaborative on Educational Excellence, the Superintendent of Public Instruction, or other external advisors.

Components of Rubrics To Be Developed by SBE. Within the guidelines laid out above, statute gives the SBE discretion over the content and design of the rubrics. Of particular note is the SBE's latitude in setting state-level expectations for improvement, thereby affecting which districts and how frequently districts are identified for additional support. The SBE must adopt evaluation rubrics by October 1, 2015. Districts' 2015-16 data likely will serve as the baseline for determining if districts are meeting the state-level expectations set forth by SBE in the rubrics. (Districts begin receiving support after they have failed to improve outcomes in at least one state priority area.)

ANALYSIS OF 2014-15 LCAPS

Reviewed 50 LCAPs. Our review aimed to summarize the content of a sample of LCAPs—including districts' goals, actions, metrics, and uses of supplemental and concentration funding—and identify common themes among the plans. As part of this review, we examined whether the LCAPs

overall reflected thoughtful strategic planning by districts. We did not aim to critique the specific program decisions made by particular districts, but rather explored the fundamental usefulness of LCAPs as implemented by districts in 2014-15. We read and catalogued 50 LCAPs representing a diverse set of districts.

Sample Included Districts of Different Sizes and EL/LI Enrollment. To select the bulk (39) of districts for our sample, we created categories of large, mid-size, and small districts based on total enrollment. Within each of these size categories, we selected some districts that had high, average, and low EL/LI enrollment. Using this stratification method, we selected 21 large districts (with enrollment between 10,000 and 50,000 students), 9 mid-size districts (with enrollment between 5,000 and 10,000), and 9 small districts (with enrollment under 5,000 students). We then added the state's 11 largest districts to round out our sample. These 11 districts alone comprise 18 percent of enrollment in the state. Our entire sample covers 26 percent of enrollment across the state. In selecting specific districts for our sample, we also ensured geographic diversity. Our sample contains districts from 24 (of 58) counties, as displayed in Figure 5.

Interviewed Some COE and District Staff. To better understand the LCAP development and review process, we spoke to several COEs and districts about how the process worked for them. Our questions for districts focused on how they engaged their communities, who within the districts worked on LCAP development, and what impact the LCAP process had on districts' plans for the school year. We asked COEs about their processes for reviewing districts' LCAPs, focusing on how COEs supported districts through the process. These interviews provided helpful context that enriched our LCAP analysis. Figure 6 (see page 12) summarizes our major findings and assessment, which we discuss in more detail next.
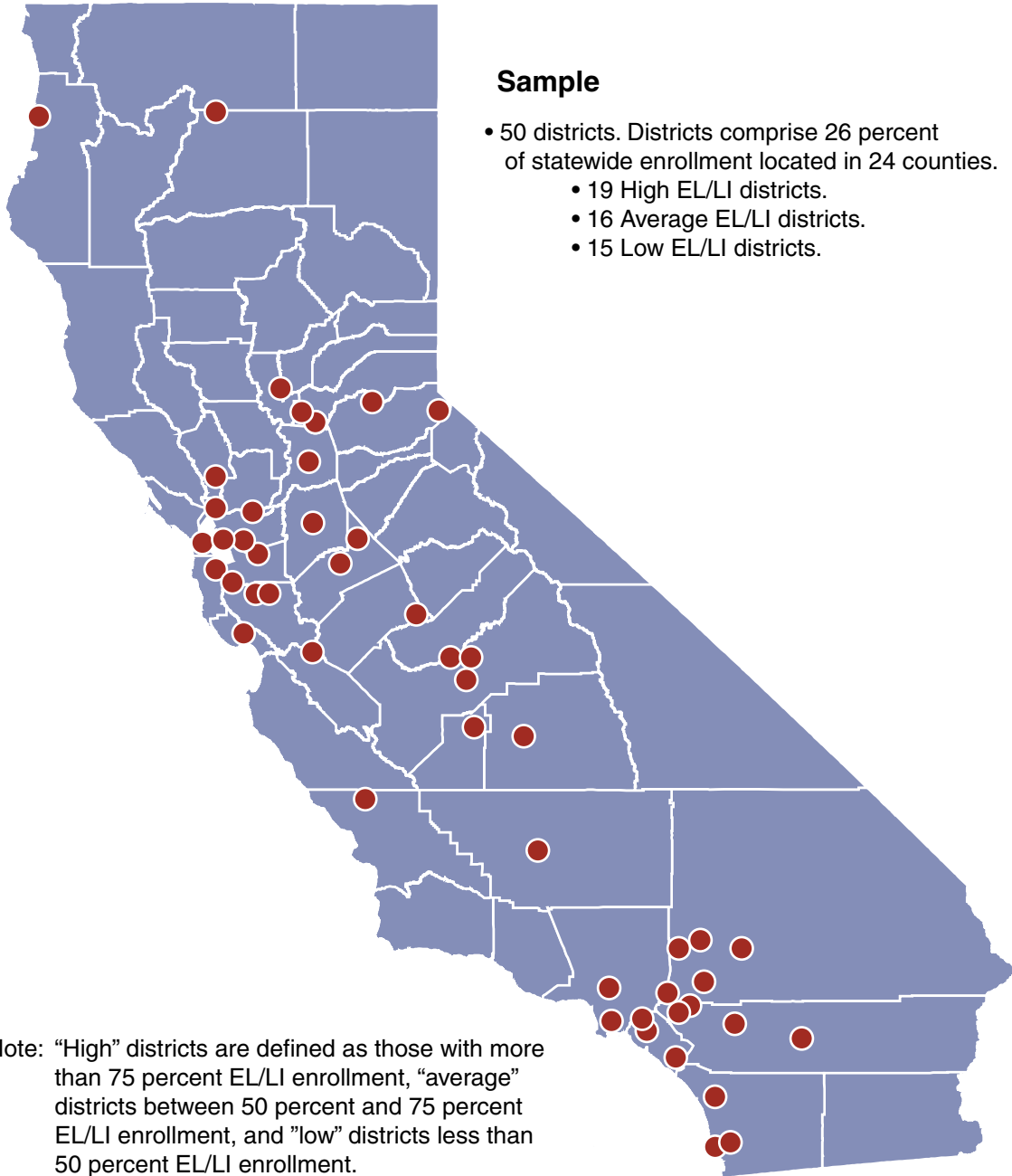
LCAP Design

Statute Establishes Ambitious Set of Requirements. The statute governing the components of the LCAP requires districts to set goals in all eight state priority areas, identify and describe actions to reach those goals, and track progress using 24 metrics (plus any local metrics). In addition, the statute instructs districts to set specific goals and identify actions for 12 student subgroups and each of their schools for all the priority areas. Taken together, these requirements are a daunting undertaking for districts to accomplish and accomplish well. Though most of the LCAPs we reviewed attempted to comply with many of the statutory LCAP requirements, none compiled with every statutory requirement.

First SBE Template Very Complex. The organization of the first SBE template separated districts' actions from their associated metrics. This disjointed template design created challenges for districts to develop coherent strategies that aligned their goals, actions, and metrics. In some cases, we also found that districts listed metrics that were not measuring the impact of the actions they chose to pursue. This made tracking the impact of districts' actions on student outcomes particularly challenging.

New Template Organizes Information in More Useful Way. The new template recently adopted by SBE groups all of the relevant information associated with a particular goal together. This organizational change will not condense required information, but it will ensure that all related information is in the same section. As a result, readers will be able to identify which area of improvement each goal is addressing, the actions to be taken to address the goal, and the metrics the district will use to measure progress towards meeting the goal. Moreover, the new template should help districts better establish the relationship between their areas in need of

Figure 5

Districts Included in Our Sample

Sample

- 50 districts. Districts comprise 26 percent of statewide enrollment located in 24 counties.
    - 19 High EL/LI districts.
    - 16 Average EL/LI districts.
    - 15 Low EL/LI districts.

Note: "High" districts are defined as those with more than 75 percent EL/LI enrollment, "average" districts between 50 percent and 75 percent EL/LI enrollment, and "low" districts less than 50 percent EL/LI enrollment.

EL/LI = English learner, low-income and foster youth students.

improvement, goals, and actions, which should result in better plans.

LCAP Has Potential as Strategic Plan. Though the first LCAP template had notable shortcomings, we believe the revised LCAP template has overcome some of those issues and is a more useful framework for helping districts develop coherent plans. Despite the refinements to the template, however, the fundamental challenge for districts in developing clear LCAPs remains the tension between being comprehensive versus focusing on the areas in greatest need of improvement.

Goals

Some Districts Lack Overarching Goals. Whereas some districts' LCAPs focus on a few, key overarching goals (such as improving college and career readiness), other districts set many narrow goals (such as reducing the dropout rate by 5 percent, decreasing the teacher misassignment rate to 2 percent, and increasing the number of science courses offered). When districts set numerous, narrow goals without any broader ones, the overall direction and emphasis of those districts can be more difficult to follow.

Figure 6

Summary of Major Findings and Assessment

	Findings	Assessment
LCAP Design	• Statute establishes ambitious set of requirements, including requiring districts to set goals for 12 student subgroups and each of their schools.	• LCAP has potential as a strategic plan if refined to be more focused on districts' key performance issues.
Goals and Priority Areas	• Some districts lack overarching goals. • Statute appears to emphasize eight state priority areas equally. Districts are prioritizing among them.	• Districts' goals not targeted to areas in greatest need of improvement. • In some cases, districts do not appear to be carefully considering which priority areas to align with their goals.
Actions	• Districts pursuing relatively similar actions. • Detail of districts' actions varies widely. Some provide step-by-step information, while others only provide general information. • Districts vary in extent to which they link funding with actions.	• Districts rarely differentiate between new and ongoing actions, making understanding new strategies difficult. • Districts vary in which funding sources they include, thereby omitting some actions supported with non-LCFF funding.
Metrics and Targets	• Districts include some, but not all metrics and targets in their LCAPs. • Most districts set single target for all students. • Many metrics do not apply to elementary school districts.	• Districts rarely include baseline data for metrics, making targets less meaningful.
EL/LI Services	• Districts' information on EL/LI services varies.	• Difficult to determine if and how districts are improving services. • Districts often fail to justify rationale for providing districtwide or schoolwide services.

LCAP = Local Control and Accountability Plan; SBE = State Board of Education; LCFF = Local Control Funding Formula; COEs = county offices of education; and EL/LI = English learner, low-income and foster youth.

In Many Cases, Districts' Goals Not Well Aligned to State Priority Areas. Few districts' goals focus on a single priority area. Instead, districts set goals and then align priority areas to those goals. As a result, each priority area often is attributed to multiple goals. In some cases, districts attribute all priority areas to all their goals even when little connection between the goals and priority areas exists. In these cases, districts do not appear to be carefully considering which priority areas align with their goals. Districts may have set goals first and then aligned the priority areas to those goals due to the template design. The template first asked a district to set goals and then asked what priority area each goal covered.

Eight State Priority Areas

Statute Appears To Emphasize Eight State Priority Areas Equally, Districts Are Prioritizing Among Them. Both current law and the original and revised LCAP template enumerate the eight state priority areas without any indication that one priority area should receive greater attention than another. As a result, the state is indicating to districts that all priority areas are of equal value. Despite the apparent equal weighting among the priority areas in statute, districts do not appear to be emphasizing them equally. In most cases, districts are setting goals that span multiple priority areas, with some priority areas appearing more frequently than others. For example, the student achievement priority area commonly is aligned with districts' goals whereas the parental involvement priority area is less commonly aligned to goals. Districts also emphasize particular state priority areas through the actions they choose to pursue and the resources allocated to those actions.

Having To Address All State Priority Areas Detracts From Focus on Areas in Need of Greatest Improvement. As noted above, the state provides no guidance for how districts should weight the priority areas. Consequently, districts must speak to all of the priority areas regardless of whether the districts face challenges in all of them. For instance, some districts already have high levels of parent involvement, low expulsion rates, and extensive course access. As a result, some districts are spending time and effort on addressing nonissues or relatively low-priority issues given their local context. This seemingly wasted time and effort might be better spent on high-priority issues that those districts do face.

Actions

Districts Pursuing Relatively Similar Actions. Districts most frequently cite specific professional development as an action they will undertake to help achieve one or more of their goals for all students as well as EL/LI students. The particular type and focus of professional development varies across districts, but districts frequently reference Common Core State Standards-related training in their actions. The next most commonly cited activities across LCAPs are expanding community engagement efforts, purchasing additional materials (textbooks and consumables), enhancing technology (hardware and software), implementing or expanding differentiated instruction, updating or improving facilities, and hiring additional counselors. Parent engagement, new materials, and differentiated instruction are particularly common actions districts identify for supporting EL/LI students.

Detail of Districts' Actions Varies Widely. Some districts provide step-by-step information for the actions they plan to take to achieve their goals, while other districts provide very general information about the activities they plan to implement. For instance, in a very detailed LCAP, if a district's goal were to achieve a one-to-one student-to-device ratio, that district might include information about the purchase of the

technology, installation of software, purchase of supporting equipment (for example, computer carts), professional development plans for staff, and distribution of devices across classrooms. In contrast, in a less detailed LCAP, the district might only include how many devices it plans to purchase each year. Each approach can have shortcomings. Very detailed LCAPs sometimes provide so much information that the overall objective can be obscured by the details of implementation. The LCAPs with more general information, on the other hand, might not provide sufficient detail for the reader to understand how districts are going to implement their actions, or worse, districts may not yet have fully planned their actions.

Districts Rarely Differentiate Between New and Ongoing Actions. Understanding which actions are a continuation of efforts from the prior year versus those that will be new in the upcoming school year is not possible in the majority of LCAPs. In a few cases, districts indicate an action is ongoing by including language like, "*continue* to offer tutoring for students reading below grade level," but this is infrequent. Without a clear indication of ongoing activities, the reader cannot determine which strategies are new for the district or how the district is using the additional funding it is receiving under LCFF. (As discussed more below, this is particularly an issue when trying to understand changes in supplemental services for EL/LI students.)

Districts Vary in Extent to Which They Link Funding With Actions. All LCAPs provide some information about the funding supporting their actions. Some districts, however, provide detailed information about the amount of funding they are dedicating to each action included in their LCAPs. In contrast, other districts only identify total funding for particular goals and groups of related actions. When districts identify only the total amount of funding provided for a particular goal,

the reader has more difficulty determining which action will receive the most funding, attention, and priority. For example, one district's goal could be to decrease the number of fifth graders reading at the far below basic level. To accomplish that goal, the district could plan to provide tutors, introduce a literacy program in earlier grades, and increase professional development for teachers. If the district only gives the aggregate amount of funding earmarked to support that goal, the reader cannot determine which activity the district believes is most critical for achieving its goal.

Districts Also Vary in Which Funding Sources They Include. Some districts report actions supported by all funding sources—LCFF, state categorical programs, federal grants, and private grants. By including all of the funding sources available to the districts, these LCAPs provide comprehensive information about the resources the districts are dedicating to improving student outcomes. Other districts only identify LCFF funding (base, supplemental, and concentration) in their LCAPs. Districts that only include LCFF funding either are not including actions supported by other fund sources or are underrepresenting the resources dedicated to actions described in their LCAPs. Another group of districts' LCAPs include an amount of funding provided to support each action but do not identify if the funding is from their LCFF allocation, federal grants, or local sources. For these LCAPs, readers can have great difficulty knowing if the activities outlined are intended to be comprehensive.

Metrics and Targets

Districts Include Some, but Not All, Metrics and Targets in Their LCAPs. While the majority of districts' LCAPs include some metrics and targets associated with their goals, few LCAPs include every metric listed in statute. In particular, districts frequently lack clear

metrics and targets for the following three priority areas—implementation of state standards, parent involvement, and course access. This likely is due to statute having few metrics and somewhat unclear metrics for these priority areas. In addition, some of the metrics listed in statute require data that districts currently do not collect. Some districts indicate that they will determine how to measure progress in these particular areas over the course of next year, but other districts have no plan for measuring progress in these areas.

Districts Often Include Local Metrics. Most districts go beyond the statutorily required metrics and include a number of local metrics and targets to measure progress towards achieving their goals. Districts often use locally developed metrics to measure process goals like access to technology. Other common local metrics include interim student test results and teacher participation in specific professional development activities. These local benchmarks appear to provide additional, useful information about how districts are tracking the impact of their actions.

Most Districts Set Single Target for All Students. Districts often do not set targets for student subgroups or schools. The vast majority of targets set by districts are for all students in the district. For example, most districts set a single graduation rate target that applies to all their students rather than setting separate targets for each subgroup or particular schools. The one common exception is for EL students, for whom districts set specific targets for reclassification and passing the California English Learner Development Test.

Districts Rarely Include Baseline Data for Metrics, Making Targets Less Meaningful. In most cases, districts do not provide current-year or prior-year data for their metrics. As a result, readers are unable to identify districts' existing

performance. Without information on current performance, readers cannot judge whether districts' targets are reasonable or might be questionably high or low given their starting points. (Targets also are less meaningful if districts change their measurement methods over time. The LCAP template does not explicitly require districts to use the same measurement methods year over year. For example, if a district uses a cohort graduation rate method one year and changes to a twelfth grade graduation rate method the next year, its corresponding targets would not be comparable year over year.)

Many Metrics Do Not Apply to Elementary School Districts. A number of the metrics listed in law—including career and college readiness and graduation rates—apply only to high schools, not to elementary and middle schools. Our sample included a few elementary school districts, none of which included those high school-oriented metrics, but often these districts included other local metrics to capture elementary-appropriate outcomes. These local measures vary greatly across districts, however, with no statewide measures for elementary school-specific outcomes, such as kindergarten readiness and proficiency in reading by third grade.

Supplemental Services for EL/LI Students

Difficult To Determine If and How Districts Are Improving Services. The variation in the level of detail about districts' actions, as described above, also applies to districts' descriptions of their services for EL/LI students. Some districts give detailed descriptions of EL/LI services, others provide general information. In a few cases, districts merely restate the actions described for all students. In those cases, districts' LCAPs do not provide information on any targeted supplemental services for EL/LI students. As with actions for all students, most districts do not

differentiate between new and ongoing actions, making it difficult to understand how EL/LI services are increasing or improving.

Districts' Information on EL/LI Funding Varies. Some districts' LCAPs identify their year-to-year growth in EL/LI funding, while others only include the total amount of EL/LI funding generated for that year. Some districts provide both amounts. By only providing the total amount of EL/LI funding, districts are not providing information on the relative growth in services that should be expected in that year. This makes understanding what services are increasing or improving even more challenging.

Districts Often Fail To Justify Rationale for Not Targeting EL/LI Services. Often, districts' justifications of districtwide and schoolwide services consist only of recapping the actions they will pursue on behalf of all students and indicating those actions also will benefit EL/LI students. Though few districts provided clear or compelling rationales for using their supplemental and concentration funds on a districtwide and schoolwide basis, this lack of clarity seems most problematic for districts with relatively low proportions of EL/LI students—districts for

whom targeted services generally would be more appropriate.

LCAP Review

COEs Approach LCAP Reviews Differently. Statute allows but does not require COEs to support districts in developing their LCAPs. (As noted previously, statute requires COEs to approve districts' LCAPs if they meet three conditions of approval—adhering to the template, providing sufficient resources to implement actions, and meeting the regulations for supplemental services. Statute does not authorize COEs to require districts to include particular actions in their LCAPs.) Some COEs offered to review draft LCAPs and provide feedback on districts' plans. The advantage of this more proactive approach is that it provided an opportunity for COEs to help districts build better plans and ensure districts would meet the conditions of approval prior to final submission. These LCAP reviews also may be helpful for avoiding performance issues down the road. Other COEs did not provide the same level of support. These COEs might have missed an opportunity to support districts and help guide them in how to develop strategic plans.

RECOMMENDATIONS

Overall, we believe LCAPs show promise as strategic plans but would be more useful if districts were allowed to focus on their key performance challenges. Figure 7 summarizes our recommendations, which we discuss in more detail below.

Emphasize Clear, Strategic Plans Over Detailed, Comprehensive Plans. Requiring districts to cover every priority area—regardless of local conditions—reduces the time and energy districts can spend on areas in need of most

attention. To help ensure that LCAPs can evolve into meaningful, strategic plans, we recommend the Legislature allow all districts to focus their plans on their highest-priority areas rather than require them to address all eight state-specified priority areas. For the smaller set of high-priority areas, we recommend the Legislature continue to require districts to identify the actions they plan to take to improve their performance and track their outcomes. To ensure districts address areas of poor performance, we recommend the Legislature

require districts to include in their LCAPs the most critical state priority areas identified by the COE evaluation as areas in need of improvement.

While moving from comprehensive to focused plans would reduce the amount of information available in districts' LCAPs, the LCAP is not the sole means of evaluating districts' performance. By law, the evaluations rubrics will be used to conduct comprehensive assessments of districts' performance across all priority areas, metrics, and subgroups. In addition, most of the metrics currently required in the LCAP are publicly available through the state's existing data system, which can be accessed online, and in numerous other reports required by state and federal law. For a few metrics, the state currently does not collect data. Moving forward, the Legislature could consider the value of having these metrics centrally reported too.

Allow Districts To Focus on Key Metrics. We recommend allowing districts' LCAPs to only include metrics (and targets) for those key areas in need of greatest improvement. We also recommend that districts not be required to include every statutory metric in their key areas if they meet state-level expectations in those specific metrics as set by the SBE in the evaluation metrics.

Clarify Metrics in Some Areas To Help Monitor Performance. We also recommend the Legislature consider replacing and/or clarifying existing statutory metrics designed to measure implementation of state standards, parental involvement, and course access, as no established statewide measures exist in these priority areas. In

addition, we recommend the Legislature clarify in statute which metrics apply to elementary districts and consider identifying new elementary-specific student performance metrics. Improved metrics for elementary districts and in the priority areas above would help districts that need associated improvement to more meaningfully track progress over time.

Require Districts To Indicate Whether Actions Are New or Ongoing. For any priority areas contained in a particular LCAP, we recommend the Legislature require the district to distinguish between new and ongoing actions. This distinction will provide clarity on where districts are making new investments and help identify which particular strategies may be affecting student outcomes. Distinguishing between new and ongoing actions will be particularly helpful in assessing the impact of funding increases in future years.

Monitor Quality of Information Regarding EL/LI Students, Make Minor Statutory Changes. As we discussed previously, some districts provide limited information regarding the actions they will take and the funding they will provide to serve EL/LI students. In addition, districts often fail to justify why they are using supplemental and concentration funding for districtwide and

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Figure 7

Summary of Recommendations

✓ Emphasize clear, strategic plan over detailed, comprehensive plan.

✓ Allow districts to focus on key metrics.

✓ Clarify metrics in some areas to help monitor performance.

✓ Require districts to indicate whether actions are new or ongoing.

✓ Monitor quality of information regarding EL/LI students, make minor statutory changes.

✓ Disseminate information on key ingredients of effective strategic plans.

EL/LI = English learner/low income.

schoolwide purposes. We encourage the Legislature to monitor districts' EL/LI information over the next few years to determine if districts' descriptions of and justifications for EL/LI services improve. To this end, we recommend the Legislature conduct an informational hearing during fall 2016 to solicit feedback from school districts, county offices of education, and community groups about the quality of this information. At that time, if the information in districts' LCAPs continues to lack sufficient detail, the Legislature could consider giving COEs more authority to disapprove LCAPs that lack such detail.

In the meantime, we recommend the Legislature enact several more modest changes to statute to improve the quality of information districts provide. Specifically, we recommend the Legislature modify state law to clarify that districts must include all funding sources (local, state, and federal) supporting EL/LI services in their LCAPs. In addition, we recommend requiring—through statutory or regulatory changes to the LCAP template—that districts' LCAPs indicate whether identified EL/LI services are new or ongoing. Lastly, in addition to reporting their total funding (already required), we recommend districts' LCAPs include their year-to-year growth in supplemental and concentration funding.

Disseminate Information on Key Ingredients of Effective Strategic Plans. As discussed earlier, both the level of information in LCAPs and the overall quality of LCAPs vary greatly across districts. We recommend the Legislature direct the California Department of Education to disseminate examples of model LCAPs to districts, including model information about how to describe and justify services for EL/LI students. These model LCAPs could help guide districts in developing more thoughtful plans in the years to come. We think these model LCAPs should not dictate districts' decisions, but rather help districts understand the level of information needed to develop thoughtful strategic plans. Consistent with the recommendations we make earlier in this report, we believe a model LCAP would focus on a handful of key, overarching goals, identify new and ongoing actions for achieving goals, set clear targets and include baseline data in key performance areas, and include all funding sources supporting the plan.

CONCLUSION

Thoughtful LCAP development is critical to effective strategic planning for districts. While we recommend making some adjustments to the LCAP design to improve LCAP quality, LCAPs should not be viewed as the means of comprehensively assessing districts' performance. Instead, we believe LCAPs should be viewed in the broader context of the new system of support and intervention. Once the evaluation rubrics are finalized, districts' performance, as guided by the strategies in their LCAPs, can be evaluated. In turn, these evaluations can help districts refine future LCAPs. How effective the new system of support and intervention will be, however, rests on the structure of the evaluation rubric. Therefore, we believe tracking what decisions the SBE makes regarding the evaluation rubric to be critical. Taken together, we believe our recommended refinements to the LCAP and a well-designed evaluation rubric can serve as a solid foundation for monitoring and assisting districts as they seek to improve student outcomes in the coming years.