



LEAGUE OF WOMEN VOTERS® OF CALIFORNIA

August 13, 2013

To: The California State Board of Education
Via WestEd at lcff@wested.org

From: Jennifer A. Waggoner, President
The League of Women Voters of California

Re: Local Control Funding Formula Implementation Input

Note: The State Board of Education and California Department of Education are in the process of holding meetings to obtain input and ideas regarding the Local Control Funding Formula (LCFF). Barbara Inatsugu, Program Director for Education PreK-12 of the League of Women Voters of California, was in the audience and prepared to comment at the first hearing in Los Angeles County. Although she arrived by the stated start-time for the session, she was sent to a second overflow room and informed that public comments were closed. We are, therefore, submitting our comments in writing.

The League of Women Voters of California has long supported a less complex, more transparent system of public education funding—one that is adequate, flexible, equitable, reliable, and sustainable; one that is understandable to the public. The League also believes that the state is responsible for the primary funding of public education, with provision for as much local control as possible over local schools.

The Local Control Funding Formula shifts the majority of decision making primarily to local school boards, making them responsible for the distribution of funds and the implementation and evaluation of programs.

The League believes that certain fundamental principles are important to your process as you create the templates and guidelines that will be used locally as we move forward with implementation. We, therefore, respectfully submit the following comments to the State Board of Education:

Transparency

There must be fiscal transparency to ensure local engagement and local accountability for how the dollars are used.

The League agrees with others in the education community that with decision making moved to the local level, school district reporting must include information that is easily accessible to parents, educators, community members and the general public to allow for and encourage significant active engagement and oversight.

We also agree that school districts must, therefore, report to each school site and the community how funds are spent at both the school and district level using common, school level expenditure reporting definitions. Consistency across schools and districts is important in developing a transparent process.

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Accountability

Local control requires local community and parent engagement that is informed, active, and included in the decision making process at both the school district and school site levels.

The League believes that any system of educational governance should provide *both clear lines of authority and clearly defined methods of accountability*. We are pleased that the adopted LCFF moves in the direction of requiring school districts and school sites to clearly show how supplemental and concentration grant funds benefit each of the subgroups that generate that funding.

- We support an accountability/reporting system that documents clearly how the supplemental and concentration grant funding is spent and how it has benefited the groups generating that funding.
- In looking at the use of supplemental and concentration grant funds at the school site level, we encourage the State Board of Education to include the school-wide Title I model in their deliberations.

Effective accountability must also include interventions and consequences, with the infrastructure to support them, for districts/sites that are not meeting their planned fiscal and achievement outcomes.

- There should be equitable and objective standards to evaluate a district's plan.

We agree with others in the education community who have expressed the belief that we should build on, expand, and improve some of the existing governance and advisory structures, rather than asking school districts and school sites to create entirely new ones.

- It clearly makes sense to utilize the School Site Councils (SSC) and to more systematically empower them. Title I schools are required to have SSCs, which, by law, include multiple constituencies, including teachers, administrators, classified personnel, parents, and, at the secondary level, students. In some districts SSCs work well, and in many they don't. Creating another school site mechanism doesn't make sense; reworking, requiring regular training, and empowering does.

Public Engagement and Local Control: Accessibility

- Public hearings should be scheduled at times when parents and community members are available to attend and should have wide notice in a variety of formats and outreach.

It is our hope that any templates and other accountability guidelines will include not only the requirement that public hearings be held, but also strong encouragement for school districts to follow best practices in informing and engaging their parent and community members so the input at such hearings can be informed, diverse, substantive, and relevant. Such best practices can be compiled and posted on the CDE website and referenced on templates and accountability guidelines produced for distribution to school districts.

- An example of a proven best practice is to hold one or more budget workshops designed to inform and engage members of school site councils, parent groups, and community members. Such workshops should be prominently publicized and welcoming.
- Other examples are to provide and publicize relevant online materials that can be readily accessed by interested members of the public and to work with such community groups as the League of Women Voters or parent groups as the PTA to provide more effective outreach and increased informed engagement.

The League agrees with our education partners that the entire school community—including parent associations, teachers, school site councils and other entities—and community members must have the opportunity to provide input and review Local Control and Accountability Plans (LCAP) to confirm that the plans are in alignment with stated goals and local school priorities.

- Districts should not simply provide pre-written plans with a request for sign-off. That does not serve the school community well, but currently happens too often. Parents and interested community members must have the opportunity to be partners in the *development* of plans, not just brought in after the fact to give the appearance of participation.
- Effective accountability must include a meaningful evaluation of school and district plans, not just a compliance checklist.

Don't Forget to Include the Too Often Forgotten

Like foster children, **young people returning from incarceration in camps and juvenile detention facilities** have been wards of the state, a fact that increases the state's responsibility for not only their welfare, but also their education. As these youth are returned to their communities and their local schools, they have transitional needs—special needs, just as those currently included in the proposed supplemental grant. Too often they are not given the support they need, and they continue in their role as mere statistics. We can't afford to continue losing so many of our youth.

Exclusions from the LCFF

The League agrees with maximizing flexibility to enable districts to meet local priorities and minimizing paperwork and compliance-driven thinking. To that end, we agree with the intent of the LCFF to limit the number of programs exempt from flexibility. At the same time, there are some programs that should be excluded and funded directly to assure their continued existence.

The state has adopted Common Core State Standards. A fundamental tenet is that all students should graduate college- and/or career-ready. The League strongly supports that concept. Yet, the LCFF proposal as currently structured does not secure the CTE and ROC/P programs that serve unique student needs, are outside the core educational program provided by most districts, and are designed to help students be career-ready. We were pleased to see the proposal in the May Revise that essentially would give a two-year window of time that will allow for a more thorough vetting and consideration of issues related to Regional Occupational Centers and Programs and Career Technical Education.

Implementation

Adoption of the Local Control Funding Formula is major reform in the way public schools in California are funded. Such reforms, by definition, take time to implement well. The Governor has called for a seven-year phase-in. During that time, there should be ongoing oversight, enforcement of accountability provisions, and identification of areas needing adjustment, whether it be to improve, correct, or enhance.

It is essential that local districts be given time to engage their boards, staff, families, and other community members in planning.

Without informed and active parent and community engagement, the LCFF will not achieve its goal of local decision making that reflects priorities in more than 1000 school districts, while being held accountable to our communities and the state.

The League of Women Voters of California looks forward to ongoing robust discussions, thoughtful decision making, and continuous evaluation and adjustment, as needed, to assure adopted reforms work well and live long. That will strengthen California's public school system and provide equitable access to a quality education that offers all our students the opportunity to graduate from high school both college- and career-ready, a goal we all hold in common.