



Delivered via fax and e-mail

Date: March 17, 2014

To: Debra Thacker, Regulations Coordinator
Administrative Support and Regulations Adoption Unit
California Department of Education

From: Andrea Ball, Legislative Advocate

Copy: Members, California State Board of Education
Hon. Tom Torlakson, State Superintendent of Public Instruction
Karen Stapf-Walters, Executive Director, California State Board of Education

RE: CSBA Comments on Proposed Title 5 Regulations Regarding Local Control Funding Formula Spending Requirements for Supplemental and Concentration Grants and Local Control and Accountability Plan Template

The California School Boards Association (CSBA) believes the existing language provides clarity and discretion for California's school districts, county offices of education and charter schools to proceed with implementing the Local Control Funding Formula (LCFF), and preparing and developing sound Local Control and Accountability Plans (LCAP). Moreover, maintaining language that is consistent with the emergency regulations now in place will allow local education agencies (LEAs) to continue timely implementation activities in this initial period of LCFF and LCAP, as they adhere to and gain deeper understanding of the requirements reflected in the existing regulations.

Section 15496. Requirements for LEAs to Demonstrate Increased or Improved Services for Unduplicated Pupils in Proportion to the Increase in Funds Apportioned for Supplemental and Concentration Grants.

- The proposed regulations provide statewide standard parameters for the methodology for calculating and meeting proportionality requirements. We believe this methodology provides valuable clarity to the statutory language.
- The spending regulations also provide relatively simple rules and criteria for LEAs to use to develop *districtwide* and *schoolwide* programs and services. The differing levels of explanation and rationale for LEAs whose enrollment of

students in unduplicated categories is below specified thresholds will promote thorough consideration of consistent programs across districts and schools.

- LEAs would benefit from additional clarification in regulation or via Frequently Asked Questions (FAQs) of how they may attribute prior year districtwide and schoolwide expenditures in making the proportionality calculation.
- We understand the State Board of Education and California Department of Education are preparing FAQs to assist local education agencies in applying the methodology contained the regulations. These materials will be of significant assistance, especially in this first year of implementation, in developing a common understanding of the calculation methodology and will help ensure that there is consistency statewide as districts and counties work through the LCFF approval process.
- To assist in development of FAQs, CSBA will be happy to provide the State Board of Education and the California Department of Education with suggested topics and sample questions based on surveys of our members we have already initiated.

Section 15497. Local Control and Accountability Plan and Annual Update Template.

- The LCAP template provides prompts to assist boards, management, staff, parents and students in analyzing data, considering options and designing programs and budget priorities to address the state priorities. The template also provides helpful organizational grouping of the state priorities to help LEAs structure development of their LCAPs.
- We urge the State Board of Education and the California Department of Education to:
 - Develop and provide electronic templates for the LCAPs;
 - Provide access to electronic links to state data sets that can be used to define and measure progress in the state priorities.

Thank you for your consideration of these comments. Please don't hesitate to contact me if you have questions or would like additional information. I can be reached at aball@csba.org or (916) 616-3116.