

CALIFORNIA'S NEW SCHOOL PLANNING AND ACCOUNTABILITY SYSTEM

AS THE SYSTEM EVOLVES, WHAT STATE ACTION WILL BE NEEDED?



INTRODUCTION

When California lawmakers adopted the new Local Control Funding Formula (LCFF) in 2013–14, they significantly changed the way the state funds K–12 public schools and holds local educational agencies (LEAs) accountable for meeting student needs. Their main goal: improve pupil outcomes with a focus on closing historic achievement gaps for educationally disadvantaged student groups. It will take several years to fully implement these reforms and assess student outcomes under the new policies.

Assembly Bill 97 (Committee on Budget), Chapter 47, Statutes of 2013, created the LCFF; it was refined in subsequent legislation.

The LCFF allocates most of the state's Proposition 98 funding to LEAs—school districts, county offices of education, and charter schools. For the 2013–14 school year, the LCFF allocated about \$43 billion in Proposition 98 funding to LEAs statewide. As the LCFF is fully phased in over several years, it will provide funding increases to most school districts, with the largest increases to districts that serve the most students from three high-needs pupil groups: students from low-income households who are eligible for free or reduced-price school meals, English learners, and foster youth. Under the LCFF, these students generate higher funding than the typical student, reflecting a widely held belief that it costs more to meet their educational needs.

With the passage of the LCFF, most state spending restrictions and program-related requirements for school funds were removed and replaced by new LEA planning and accountability provisions. Now, LEAs must align their LCFF resources to local plans, developed in consultation with local stakeholders, for improving pupil outcomes and other factors believed to affect school quality and student success. In addition, a new accountability and support system is being developed to assess LEA performance for these state educational priorities and to assist LEAs when they need improvement.

Proposition 98, passed by California voters in 1988, established a formula for determining the annual minimum level of funding guaranteed for K–12 public schools and community colleges. Funding to meet the Proposition 98 guarantee includes revenues from the state General Fund and local property taxes.

Beginning in 2013–14, the LCFF replaced the prior system of allocating Proposition 98 funding to LEAs primarily through revenue limits and state categorical education programs. Revenue limits provided LEAs with general purpose funding, and categorical education programs provided restricted funding to meet students' special educational needs beyond the core instructional program. Each categorical program had its own funding formula, and many had unique accountability rules aimed to ensure LEAs would spend the funding they received according to state goals for these programs. That system was criticized by many education stakeholders for being too complex, outdated, inequitably distributed, administratively costly, and not reflective of student needs. Revenue limits and more than 40 categorical programs were eliminated, and the funds associated with those programs were subsumed under LCFF. About 15 categorical programs still remain outside of the LCFF. The LCFF includes a single, multistep allocation formula for school districts and charter schools and a different formula for county offices of education. Along with establishing these formulas, the state created LCFF funding targets for all LEAs. County offices of education reached their funding targets in the 2014–15 school year. School districts are expected to reach their targets after several more years, based on projected growth in Proposition 98 funding and additional state appropriations for the LCFF. In 2012–13, the California Department of Finance estimated that all LEAs would reach their funding targets by 2020-21, and at that point more than \$25 billion in new Proposition 98 funding would have been invested in the LCFF.

Two chief components of California's prior school accountability framework—the Academic Performance Index (API) and the School Accountability Report Card (SARC)—remain, at least for now. In fact, the LCFF legislation included the API among several required pupil achievement measures under the new school planning and accountability system.^{iv} (The API and the SARC are discussed further beginning on page 17.)

However, as the new accountability system is developed, state policy makers will need to consider whether the API and the SARC will be relevant in the future and how they might work in concert with this new system. Recently, the Superintendent of Public Instruction (SPI) wrote to the State Board of Education (SBE) with an update regarding the development of a new accountability system. In his memo, the SPI indicated there are "revised expectations that a new accountability system will reflect the state priorities [of the LCFF legislation]" and "more developmental work is needed to design a comprehensive and coherent accountability system that incorporates multiple measures, encourages improved student learning, and differentiates the performance of schools and districts in reliable and meaningful ways." v

Since the LCFF legislation did not provide a complete road map for the state to transition to a new accountability system, state policy makers will need to address some unresolved issues. The Legislature will need to consider these issues in collaboration with SBE and the SPI, which have key responsibilities for implementing the LCFF reforms and the state's accountability system.

Purpose of This Report

This report describes key aspects of the new school planning and accountability system established by the LCFF legislation that will require further state action as the system evolves.

Although the legislation shifted significant control over K–12 education funding decisions from the state to LEAs, the state still has a critical role in developing, supporting, and overseeing the new system. Beyond the state's fundamental duty under the California constitution to oversee its public education system, the LCFF

The LCFF legislation also revised the definition of numerically significant pupil subgroup and established foster youth as a new pupil subgroup, for purposes of both the API and LCFF accountability.

Memo from Tom Torlakson, State Superintendent of Public Instruction, to members of the State Board of Education, "Update on Developing a New Accountability System Using Multiple Measures Consistent With Education Code Sections 52052 Through 52052.9," December 15, 2014.

legislation assigns specific responsibilities to SBE and the SPI for implementing key aspects of the reforms.

The first section of this report provides an overview of the major features of the new planning and accountability system, including the state priorities established in the LCFF legislation and other state requirements that will guide local planning.

The second section (beginning on page 13) highlights the need for future work across five main areas:

- Help LEAs Build Capacity for Effective Planning and Continuous Improvement
- Develop the Local Control and Accountability Plan Evaluation Rubrics
- Report Individual School District and School Performance Based on the Rubrics
- Disseminate Statewide Performance Data
- Monitor System Implementation

The report includes recommendations in these areas for state policy makers to consider. Most of the recommendations pertain to SBE and the SPI. Some recommendations identify areas where the Legislature may want to enact further legislation. A summary of the recommendations is on pages 28 and 29.

I. Major Features of the New System

Few state restrictions on school funds. LEAs have considerable discretion over how to spend their LCFF allocations to meet student needs. Still, there are some limited but important spending restrictions on the use of LCFF supplemental grant and concentration grant funding generated by the enrollment of high-needs pupils: low-income students, English learners, and foster youth. These requirements are described further on page 9.

State educational priorities guide local planning. Eight state priorities are established in the law for school districts and charter schools, plus two additional priorities for county offices of education. These include a range of pupil outcome measures and factors believed to affect school quality and student success. LEAs must address each of these state priorities in their new local plans. LEA performance will be assessed in each of these areas. For a list of the priorities, see "State Priorities for Local Educational Agency Performance" on pages 6 and 7.

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vi Charter schools must plan for the state priorities that apply to the nature of the program operated by a charter school and the grade levels it serves.

Local plans must focus on desired outcomes. Annually, each LEA must consult with its local stakeholders to develop a three-year strategic and fiscal plan called a local control and accountability plan (LCAP), which adheres to a template adopted by SBE.^{vii} Because this process is intended to promote continuous improvement, the plan includes an annual update in which LEAs describe their progress and plan changes since their last LCAP. At this time, LEAs are implementing the first LCAPs they developed by July 1, 2014, to cover the 2014–15, 2015–16, and 2016–17 school years. They must develop their next LCAPs, which will include their first annual update, by July 1, 2015.

Among other things, the LCAP provides a description, for the next school year and the two subsequent years, of an LEA's goals for all pupils and numerically significant pupil subgroups for each of the state priorities and any additional local priorities, its planned actions and expenditures to implement these goals, and its expected outcomes for pupils. The LCAP also includes an LEA's annual review of its progress, including its measured outcomes.

The law requires a school district's LCAP to include all of this information for the district overall and each school within the district. While some believe this requirement would be best accomplished by a separate display of information for the district and each school, SBE's LCAP template takes a different approach. The template allows LCAP goals and actions that apply districtwide to all schools or a certain type of school in a district (for example, all high schools) to be described at an aggregate level of information without information for individual schools; it requires individual school data only to describe goals and actions that are unique to schools. SBE has indicated this approach simplifies data reporting in the LCAP to make it a more user-friendly planning tool. Consequently, the LCAP is a district-focused plan, rather than a district-level and school site plan.^{ix}

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vii SBE first approved a LCAP template as part of LCFF emergency regulations it adopted on January 16, 2014. LEAs used that template to develop their LCAPs for the 2014–15 school year. On November 14, 2014, the board approved LCFF permanent regulations, including a revised LCAP template. Subsequently these regulations were approved by the Office of Administrative Law.

Pupil subgroup information is required in the LCAP only for numerically significant pupil subgroups. Numerically significant subgroups include racial and ethnic subgroups, low-income pupils, English learners, foster youth, and students with disabilities. Numerically significant means a size of at least 30 students, except for foster youth, where a group of at least 15 students is numerically significant.

Parents typically engage in school planning based on their own child's interests. If a district's LCAP doesn't contain important student outcomes data for individual schools, where can parents access it? Currently, the SARC, which all schools must develop annually by February 1, contains school data related to many, but not all, of the state priorities addressed in the LCAP. The SARC is discussed further beginning on page 17.

For more information about the structure and content of the LCAP template, see "Local Control and Accountability Plan Template Elements" on page 8. For the requirements for LEAs to develop their LCAPs through a public process, see "Local Control and Accountability Plan Transparency Requirements" on page 9.

State Priorities for Local Educational Agency Performance

The state priorities on which LEAs will be evaluated are listed below according to the three categories used in the Local Control and Accountability Plan (LCAP) template: conditions of learning, pupil outcomes, and engagement.

Conditions of Learning

Williams v. California (2004) lawsuit settlement issues, pursuant to the requirements of the settlement legislation regarding:

- Appropriate assignment of credentialed teachers
- Sufficiency of instructional materials
- School facilities maintained in good repair

Implementation of state academic content and performance standards, including enabling English learners to access the standards for purposes of gaining academic content knowledge and English language proficiency

Student access to, and enrollment in, a broad course of study that includes English, mathematics, social sciences, science, visual and performing arts, health, physical education, foreign language, applied arts, and career technical education, as applicable by grade level, including programs and services developed for low-income students, English learners, foster youth, and special education pupils

Coordination of instruction for expelled pupils*

Coordination of services for foster children*

* Applies to county offices of education only

Pupil Outcomes

Pupil achievement as measured by:

- Statewide standards tests
- State Academic Performance Index
- Completion of courses that satisfy entrance requirements for the University of California and California State University
- Completion of courses in career technical education sequences or programs of study aligned with state-approved standards and frameworks
- Progress of English learners toward English proficiency, as measured by a stateapproved assessment of English proficiency
- English learner reclassification rate
- Passage of Advanced Placement exams with a score of three or higher
- Demonstrated college readiness through the Early Assessment Program or similar assessment of college readiness

Other pupil outcomes for required, but non-state-assessed, areas of study

Engagement

Parental involvement, including parent input into school district and school decision-making and parent participation in programs for low-income students, English learners, foster youth, and special education pupils

Pupil engagement as measured by:

- > School attendance rates
- Chronic absenteeism rates
- Middle school dropout rates
- ➤ High school graduation and dropout rates

School climate as measured by:

- Pupil suspension and expulsion rates
- > Surveys of pupils, parents, and teachers on school safety and connectedness

Local Control and Accountability Plan Template Elements

The LCAP template provides the format and guidance LEAs must follow in developing and updating their LCAPs. The template LEAs will use this year to prepare their LCAPs by July 1, 2015, has some improvements over the template they followed when they developed their LCAPs last year.* In general, the revised template reflects the following structure and content:

- ➤ Section 1 includes the description of the LEA's process to consult parents, pupils, school personnel, local bargaining units, and the community, and how this engagement contributed to development of the LCAP.
- Section 2 includes the description of the LEA's goals for pupils related to each of the state priorities and any additional local priorities (including any goals that are specific to individual schools and pupil subgroups), its expected outcomes related to the goals (including metrics for measuring progress), its actions to be taken and services to be provided to implement the goals (including related expenditures for all actions for all groups of students), and a review of its progress (including any changes to the LEA's goals and actions since last year).
- Section 3 identifies the amount of LCFF supplemental grant and concentration grant funding the LEA received in the LCAP year for its enrollment of high-needs pupils (low-income students, English learners, and foster youth), according to the LEA's calculation as required by the regulations adopted by SBE. This section also describes the LEA's expenditure of this funding and how the LEA is satisfying the requirement to increase or improve services for high-needs pupils.

Legislation enacted as part of the 2014–15 state budget authorizes SBE, until January 31, 2018, to adopt future changes to the LCAP template pursuant to the Bagley–Keene Open Meetings Act process, with specified restrictions, rather than the APA.

^{*} The revised template is part of LCFF permanent regulations SBE adopted on November 14, 2014. Subsequently these regulations were approved by the Office of Administrative Law pursuant to the standards established by California's Administrative Procedure Act (APA).

Local Control and Accountability Plan Transparency Requirements

In developing their LCAPs, school districts and county offices of education must comply with the following requirements, which are designed to produce a transparent LCAP process and increase the accountability of these agencies to their local communities:*

- Consult with parents, students, teachers, other school staff, and the local bargaining units
- Present the LCAP for review and comment by parent advisory committees, including, under certain conditions, committees composed of parents of English learners, and respond to any comments in writing
- Align the LCAP and the agency's budget
- Ensure actions included in the LCAP are consistent with strategies in the school plans adopted by school site councils
- Before adoption, notify the public of the opportunity to comment on the proposed LCAP
- Adopt the LCAP and the agency's budget during the same public meeting (after the LCAP and the budget have been discussed during a prior public meeting)
- Post the LCAP to the agency's Web site

Complaints that a school district or county office of education has not complied with the required LCAP process may be filed with that entity using the existing uniform complaint process in law. Appeals of that agency's decision may be filed with the Superintendent of Public Instruction.

* Charter schools have somewhat different requirements.

Supplemental and concentration funding must benefit high-needs pupils. Based on the amount of LCFF supplemental grant and concentration grant funding an LEA receives for its enrollment of high-needs pupils (low-income students, English learners, and foster youth), the LEA must demonstrate a proportional increase or improvement in services provided to these pupils compared to the services provided to all pupils. LEAs have discretion to use this funding for services targeted only to high-needs pupils or for district-wide, school-wide, county-wide, and charter-wide services intended to benefit them. The latter approach seems most appropriate when high-needs pupils make up a large proportion of the enrollment of a school or district, but this is not a requirement. The requirements are specified in the LCFF regulations adopted by SBE.

(In November, SBE adopted LCFF permanent regulations to replace the emergency regulations that have been in effect since January 2014. One difference between the two sets of rules is the revised rules require LEAs to provide a clearer description of how district-wide, school-wide, county-wide, and charter-wide services supported with

LCFF supplemental grant and concentration grant funding principally serve high-needs pupils and are effective in meeting the LEA's goals for these students.)

State rubrics will be used to assess local educational agency performance and promote improvement. The law requires SBE, by October 1, 2015, to adopt evaluation rubrics containing standards for school district and individual school site performance and expectations for improvement for each of the state priorities. In general, a rubric is a simple tool that defines levels of performance for a set of criteria and identifies standards of performance and/or growth considered acceptable or desirable (in other words, performance goals). For example, a rubric could characterize performance at a point in time as being high, intermediate, or low in relation to specified performance goals; at the same time, it could distinguish whether performance over time has significantly improved, improved, not changed, declined, or declined significantly.

The purposes of these rubrics are to: (1) assist school districts, county offices of education, and charter schools to assess their own performance, including their strengths, weaknesses, and areas for improvement; (2) assist county offices of education in determining when districts need technical assistance; (3) assist the SPI and charter school authorizers in determining when they should provide an LEA with assistance or take other appropriate action authorized by the law, such as intervention with an LEA or charter school revocation; and (4) inform the work of the new statewide collaborative (described below) created to assist LEAs in achieving their LCAP goals.

Technical assistance collaborative created to support local educational agencies. The law establishes the California Collaborative for Educational Excellence (CCEE) as a new statewide resource entity the SPI can assign to help LEAs implement their LCAP goals and improve their performance on the state priorities. Its expertise must include the state priorities, improving the quality of teaching, improving the quality of school district and school leadership, and addressing the needs of high-needs pupils.

The law specifies CCEE will be governed by a five-member board consisting of the SPI (or his or her designee), the President of SBE (or his or her designee), a county superintendent of schools appointed by the Senate Committee on Rules, a teacher appointed by the Speaker of the Assembly, and a superintendent of a school district appointed by the Governor. The board will contract with expert individuals and groups that will assist LEAs. Now that all of the board members have been appointed and the board has a fiscal agent, efforts are under way to make CCEE operational in 2015.

County offices of education provide oversight and support for districts. Prior to the LCFF legislation, county offices of education had an important role of providing fiscal oversight for districts (including approval of districts' annual budgets) and supporting districts with their educational planning, particularly related to requirements of the Williams v. California lawsuit settlement and federal accountability requirements. Now, county offices have additional responsibilities to review and approve district LCAPs. They have a critical, front-line role to help districts comply with the state's requirements for LCAPs.

The law requires county offices to approve district LCAPs that meet these three requirements: (1) alignment with the agency's budget, (2) adherence to SBE's LCAP template, and (3) adherence to the LCFF supplemental funding regulations adopted by SBE. When a county office does not approve a district LCAP for one of these reasons, it must provide the district with assistance, which may be from the county office, academic experts, another school district, or CCEE. Additionally, county offices must provide assistance to districts that fail to improve pupil achievement for more than one state priority for one or more pupil subgroup, based on the evaluation rubrics.* A district also may request assistance from its county office of education.

The Superintendent of Public Instruction provides oversight and support for county offices of education. The SPI is the executive officer of the California Department of Education (CDE). With assistance from the department, the SPI is responsible for reviewing the LCAPs of county offices of education and approving them based on the same criteria as described above for county offices' approval of school district LCAPs. As part of this review, the SPI may make recommendations to county offices for how they can improve their LCAPs. When the SPI does not approve a county office LCAP, he or she must provide the county office with assistance, which may be from the SPI, academic experts, another county office, or CCEE. Additionally, the SPI must provide assistance to county offices that fail to improve pupil achievement for more than one state priority for one or more pupil subgroup, based on the evaluation rubrics. A county office of education also may request assistance from the SPI. (The SPI also approves

In this section of the law regarding county offices' assistance to school districts and in the section regarding the SPI's assistance to county offices, the law requires an assessment of whether a district or county office improved "pupil achievement" relative to the state priorities. But, other sections of the law pertaining to charter school authorizers' assistance to charter schools and the SPI's intervention with school districts and county offices of education require an assessment of whether an LEA improved pupil "outcomes" relative to the state and local (or charter school) priorities. This seems to be a notable difference since pupil outcomes encompasses additional pupil-focused measures beyond the specific pupil achievement measures in the legislation. It is unclear whether legislative intent was to establish different criteria in these cases or if the difference is due to technical error.

LCAPs for school districts that are the single district in a county and reviews LCAPs for charter schools as part of oversight for charter petitions authorized by SBE.)

Charter authorizers provide oversight and support for charter schools. Authorizers of charter schools, including SBE, are responsible for reviewing a charter school's LCAP as part of its oversight for a school. Charter authorizers must provide assistance to underperforming charter schools that fail to improve pupil outcomes for three or more pupil subgroups across one or more of the state or charter school priorities in three out of four consecutive school years, based on the evaluation rubrics. They may ask the SPI to assign CCEE to an underperforming charter school. In addition, they must consider charter revocation when CCEE has provided assistance to a school and determined either the school is unable to implement CCEE's recommendations or the school's inadequate performance is so persistent or acute as to warrant charter revocation. The school's record of increasing pupil achievement for all pupil subgroups served by the school is the most important factor in the authorizer's decision of whether to revoke the charter.

The state can intervene with underperforming local educational agencies. With the approval of SBE, the SPI is authorized to intervene with a school district or county office of education that fails to improve pupil outcomes for three or more pupil subgroups across two or more of the state or local priorities in three out of four consecutive school years, based on the evaluation rubrics. Before the SPI can intervene, CCEE must have provided assistance to the district or county office and determined either it is unable to implement CCEE's recommendations or its inadequate performance is so persistent or acute as to warrant intervention. SPI intervention may include: making changes to the LEA's LCAP, revising the LEA's budget, rescinding an action of the LEA (as long as that action is not required by a local bargaining agreement), and appointing an academic trustee to act on the SPI's behalf.

The law also gives SBE the authority to revoke a charter for any charter school or to otherwise intervene with a charter school that does not improve pupil outcomes across multiple state and local priorities.

II. AREAS FOR FURTHER STATE ACTION

As the new school planning and accountability system evolves, the state will need to develop, support, and oversee the system, including work in the areas described below.xi

Help LEAs Build Capacity for Effective Planning and Continuous Improvement

Due to the LCFF legislation, LEAs have great flexibility to allocate their resources to meet the needs of their students. In addition, they are operating under a new planning and accountability system focused on continuous improvement. Among other things, this system requires LEAs to set measurable goals for students related to state and local priorities, align their resources with these goals, measure their progress toward the goals, and have meaningful engagement of parents, students, and other stakeholders in their planning process.

The local flexibility provided by the LCFF, as well as the new planning and accountability requirements, represents a major culture shift for LEAs. Some are better prepared than others to implement these changes. Many will need to build capacity for these changes at both the district level and the school level.

To build this capacity, the legislation envisions LEAs will access guidance and technical assistance on multiple fronts. For example, school districts may receive assistance from the county office of education in their jurisdictions, other school districts, CCEE, and other experts, as well as get statewide guidance and information from SBE and CDE.

CCEE, in particular, is intended to have a central role in helping LEAs to achieve their LCAP goals. At this time, it is unclear exactly how CCEE will be structured and how it will approach its work, since CCEE is still being developed. Its governing board will meet for the first time in early 2015.

Some ideas for how CCEE could assist LEAs include: (1) identifying best practices for addressing the state priorities and serving high-needs pupils; (2) helping LEAs to implement effective models of stakeholder engagement and use data and metrics to focus their planning on continuous improvement; (3) facilitating collaborations of LEAs

Some of the points made in this section of the report are also addressed in the following upcoming report: Linda Darling–Hammond and David Plank, "Supporting Continuous Improvement in California's Education System," which is anticipated to be published in January 2015 by Policy Analysis for California Education at Stanford University.

jointly focused on one or more common issues; and (4) assisting school districts and schools to evaluate their programs through an intensive "school quality review" process, which state law envisions LEAs may conduct as part of their local evaluation efforts.

CCEE's initial operating budget is \$10 million; its encumbrance period for these funds runs through June 30, 2015. The Legislature will need to revisit funding for CCEE as part of the 2015–16 state budget process. However, it is unclear when CCEE will be able to describe a clear vision and plan for how it will assist LEAs in developing and implementing high-quality LCAPs. In the upcoming months, the Legislature will need to engage CCEE, as well as SBE and the SPI, in discussions about the role of CCEE and a vision and plan for its work.

Besides providing funding for CCEE, the Legislature also may want to consider making other targeted investments of Proposition 98 funding to help LEAs build capacity in specific areas of need.

Develop the Local Control and Accountability Plan Evaluation Rubrics

As described on page 10, the LCAP evaluation rubrics are intended to assess LEA performance and promote their continuous improvement. The LCFF legislation envisions school districts, county offices of education, and charter schools will use the rubrics for ongoing self-assessment to guide their plans for improvement (although the legislation stops short of making this a requirement for LEAs). In addition, the rubrics are intended to inform the technical assistance LEAs receive from the county offices of education, charter school authorizers, CCEE, and other experts, as well as the SPI's actions to intervene with underperforming districts and county offices.

SBE must develop the rubrics by October 1, 2015. The law contains these explicit requirements for the rubrics:

- They must reflect a holistic, multidimensional assessment of school district and individual school site performance.
- As part of the rubrics, SBE must adopt standards for school district and individual school site performance and expectations for improvement in regard to each of the state priorities (in other words, the rubrics should contain performance goals for each of the priorities).

In addition, the law establishes specific state performance measures (also called "metrics") for some of the priorities, but other priorities don't have prescribed or uniform state measures at this time.^{xii} For example, there is no state measure for the priority of increasing "parental involvement" in school district and school site decision-making and in programs serving high-needs pupils and special education students.

Within these parameters, SBE has considerable discretion to determine the content and format of the rubrics. This past summer, the board tasked its contractor, WestEd, with facilitating a working-group process over several months to obtain stakeholder input toward the rubrics. The process is designed to enable a wide range of interested parties to help shape the content of the rubrics. WestEd is seeking input from associations and agencies representing parents, students, teachers and other school staff; school administrators; school boards; civil rights and children's advocates; education researchers; state policy makers; and the public.

SBE is scheduled to receive draft rubrics from WestEd by spring 2015. During the board's next meeting on January 14, 2015, WestEd will provide an update about the draft rubrics that are emerging from the working-group process. This will be a key development, since so far the board itself has had little public discussion about its vision for the rubrics beyond highlighting the requirements established in statute. Since the rubrics will be a pivotal element in the new planning and accountability system, the Legislature will want to closely monitor the board's work on the rubrics.

One uncertainty is how the rubrics will assess LEA performance for the state priorities that currently lack state measures and data sources. State measures are necessary for consistent performance measurement across all LEAs and the ability to aggregate data for the state as a whole and to compare school and student group data across LEAs. Indeed, for several reasons identified on page 21, it will be important for California to have performance data that can be compared across LEAs and aggregated on a statewide basis. In addition, having consistent performance measurement across LEAs will help the SPI and others make fair and reliable decisions across LEAs about when a LEA needs technical assistance or intervention. For these reasons, the rubrics should use state measures for the state priorities to the extent possible.

For the priorities that lack state measures, LEAs must define their own local performance measures. LEAs also may use local measures as a supplement to state measures to assess their progress based on the local context. In fact, the LCFF legislation

xii In the LCAP template, measures to assess LEA performance for state and local priorities are referred to as "progress indicators" and "metrics."

acknowledges the value of LEAs including additional local priorities in their LCAPs and identifying local methods to measure progress in these areas.

Potentially, some LEAs could have innovative ways of measuring progress that could become models for the development of new state measures. However, it also may be the case that some LEAs have difficulty with performance measurement, and some LEAs may not have resources to develop quality local measures for valid and reliable measurement over time.

So far, there have been indications that LEAs could use more guidance and support in how to identify data and metrics for their LCAPs. For one, some academic researchers and advocacy groups have reported that many district LCAPs for 2014–15 did not clearly describe a district's goals, with the metrics and data it would use to measure its progress. In addition, during testimony at SBE's meeting on November 14, 2014, the California County Superintendents Educational Services Association (CCSESA) told the board that many districts were challenged to manage data collection and analysis for the required metrics for the state priorities. The forthcoming rubrics are expected to help LEAs with this aspect of their LCAPs, but LEAs may need additional support in this area from CCEE, CDE, and others.

If the state were to develop new or improved standardized measures for the state priorities, LEAs could benefit by saving the resources that are required to develop their own local measures. State leadership in this area would not preclude LEAs from developing local measures to supplement the state measures if they have the capacity to do so.

In its work on the rubrics, SBE should identify gaps in measuring the state priorities so the board and others can assess the state's options to address these gaps. For instance, the Legislature may want to consider providing funding to SBE and CDE to evaluate potential new state measures for the rubrics.

"School climate" is one of the state priorities where new standardized measures might be useful; for more information, see "Measuring the State Priority of School Climate" on page 17.

Daniel C. Humphrey and Julia E. Koppich, "Toward a Grand Vision: Early Implementation of California's Local Control Funding Formula," J. Koppich & Associates, San Francisco, CA, October 2014. In addition, the issue has been noted by some advocacy groups; see "What Stakeholders Report About Local Implementation" on pages 26 and 27.

Measuring the State Priority of School Climate

The LCFF legislation requires that the priority of "school climate" be measured in part by surveys of pupils, parents, and teachers about school safety and school connectedness.

Currently, CDE supports the California School Climate, Health, and Learning Survey System, a series of three interrelated surveys of pupils, parents, and school staff about school climate and other issues. LEAs may participate in these surveys at a cost to them, but there is no requirement that they do so. In recent years, many LEAs have not used these surveys, but going forward, more LEAs may decide to participate to obtain school climate data for their LCAPs.

In the future, the state may want all LEAs to use some version of these surveys for consistent, statewide measurement of school climate issues. The surveys also may be helpful for measuring some of the other state priorities such as pupil engagement and parental involvement in schools.*

* For more information, see "School Climate Health and Learning, California Survey System, Helpful Resources for Local Control and Accountability Plans and School Safety Plans" available at https://chks.wested.org/resources/LCAP Cal SCHLS.pdf.

Report Individual School District and School Performance Based on the Rubrics

While the LCFF legislation doesn't specify a mechanism for reporting LEA performance data based on the evaluation rubrics, ideally this would be part of the rubrics SBE adopts later this year.

Specifically, SBE should adopt a new accountability tool (or tools) for clear and consistent public reporting of all individual school district and school performance data for the state and local priorities (similar to what some call a "data dashboard" or "dashboard of performance indicators"). If this tool isn't part of the rubrics, the Legislature should consider enacting legislation to require SBE to work with CDE to develop such a tool. Potentially, it could replace two other state accountability tools—the API and the SARC—or else work in concert with them in some way.

A new rubrics-aligned tool should enable parents, stakeholders, and the public to compare performance across school districts and schools. For LEAs, learning from others and replicating best practices is an important part of continuous improvement. For parents and the public, there should be an ability to assess the performance of their

school district and school compared with others. In fact, state law already specifies this objective for the SARC.xiv

If possible, the tool also would clearly indicate when an LEA's performance warrants technical assistance or intervention, based on the criteria established in the LCFF legislation. Incorporating this information into the tool would: (1) make it easily understood by LEAs, parents, stakeholders, and the public; and (2) help county offices of education, the SPI, CCEE, and charter school authorizers make fair and consistent decisions about when to provide an LEA with assistance or intervention.

One example of a tool California can learn from is the "Accountability Pillar Overall Summary Report" used in the Alberta, Canada, education results reporting system. According to a publication by the Government of Alberta, their accountability system includes "a common set of performance measures and consistent, fair evaluation of results" with "consistent, accessible data reports" that school jurisdictions use in their planning.* Results are evaluated in terms of achievement relative to a fixed set of performance standards and improvement. The Alberta model is identified in a report about state accountability systems co-authored by Dr. Linda Darling–Hammond, Professor of Education at the Graduate School of Education, and Faculty Director of the Stanford Center for Opportunity Policy in Education, at Stanford University.* Vii

As mentioned previously, state policy makers will need to consider how a new rubrics-aligned accountability tool should relate to the API and the SARC. Indeed, both of these tools should be reconsidered in light of the LCFF legislation's focus on multiple measures of accountability (the state priorities). Once the rubrics are in place to assess school district and school performance for these priorities, will the API and the SARC still be relevant? How might they be aligned to the rubrics?xvii

xiv Education Code Section 33126 requires the SARC to "provide data by which a parent can make meaningful comparisons between public schools that will enable him or her to make informed decisions on the school in which to enroll his or her children."

xv Government of Alberta, "Accountability Pillar Fact Sheet," January 2010, available at http://www.education.alberta.ca/media/1216767/factsheet-accountabilitypillar.pdf. An example of the Alberta Accountability Pillar Overall Summary Report is available at http://education.alberta.ca/media/8610558/may2014 provincial summary 20140428.pdf.

xvi Linda Darling–Hammond, Gene Wilhoit, and Linda Pittenger, "Accountability for College and Career Readiness: Developing a New Paradigm," *Education Policy Analysis Archives*, vol. 22, no. 86, August 18, 2014.

A recent publication from the Public Policy Institute of California (PPIC) provides recommendations for revising California's school accountability program, including developing a new state accountability measure and modifying the LCAP performance measures. See Paul Warren, "Designing California's Next School Accountability Program," PPIC, October 2014.

The API is a single index that measures the academic performance and improvement of individual schools and student subgroups within schools. Created in 1999, the API was originally intended to be a multi-measure index, but to date it has measured only student achievement on state standardized tests and the high school exit examination. This is supposed to change due to state legislation enacted in 2012. (For more information about the requirements of this legislation and other anticipated changes to the API, see "Changing the Academic Performance Index" below.) However, in light of the new LCFF accountability system, the state might consider replacing the API with an accountability system focused on multiple statewide measures from the rubrics. Another option is to maintain the API and broaden it to include multiple measures.

Changing the Academic Performance Index

State law as amended by Senate Bill 1458 (Steinberg), Chapter 577, Statutes of 2012, requires the API for high schools to be revised so standardized test scores comprise no more than 60 percent of the index in the future; non-test measures would make up the other 40 percent. It also authorizes the SPI, with approval from SBE, to add other measures to the API, including middle school and high school promotion rates, middle school matriculation rates, and indicators of college and career readiness. When these provisions were enacted in 2012, state law already required the API to include high school graduation rates and school attendance rates, but these requirements were never implemented. For some time, the SPI and SBE have been studying options to broaden the API in accordance with these requirements, obtaining input from the Public Schools Accountability Act (PSAA) Advisory Committee.*

Beyond SB 1458, additional changes to the API are required to align it with California's new student assessment system. This system is being developed now to assess student achievement based on the academic content standards California adopted over the past few years, including the Common Core State Standards in English-language arts and math. Among other things, the system will feature new computer adaptive tests in English-language arts and math that will begin in spring 2015. As part of the transition to these tests, the state suspended much of its standardized testing program for the 2013–14 school year and also suspended the calculation of the 2014 Growth and Base APIs and the 2015 Growth API. Under current law, the state will calculate the 2015 Base API, unless SBE suspends this calculation.**

^{*} More information about the activities of the PSAA is available at http://www.cde.ca.gov/ta/ac/pa/. ** Typically, the API is calculated on an annual basis, and each reporting cycle includes calculation of a base API for performance in one year and a growth API for performance in the following year to measure year-to-year change.

The SARC is a report prepared by all public schools annually to provide a comprehensive picture of a school's conditions, resources, and performance. When voters enacted Proposition 98 in 1988, they established the SARC as a requirement of the state constitution. State law requires certain information to be reported in the SARC related to pupil achievement, school completion, postsecondary preparation, class sizes, curriculum and instruction, instructional materials, teachers and other staff, school safety and learning climate, parental involvement opportunities, and expenditures. xviii

Many of the state priorities required for the LCAP are addressed in some way as school data in the SARC, but some are not, including these pupil-focused LCAP measures: progress of English learners toward English language proficiency, the English learner reclassification rate, pupil rate of passing an advanced placement exam with a score of three or higher, pupil demonstration of college readiness through the Early Assessment Program, school attendance rates, chronic absenteeism rates, and middle school dropout rates.xix (While the LCFF legislation didn't make any changes to the SARC, SBE acted administratively this year to change the format of the state's SARC template to more clearly display data related to the LCAP state priorities.)

Since the SARC is required by the state constitution, it would take a constitutional amendment approved by voters to simply repeal the SARC provision. However, the state can make material changes to the SARC through state legislation that furthers the purposes of the act. Potentially, the SARC could be aligned with the rubrics to create an improved online accountability tool that provides both district-level and school-level data for the state and local priorities. The goal would be to make this tool more user-friendly for parents than the current SARC but also capable of conveying more detailed information for other users, such as practitioners and researchers.

The Legislature should have discussions with SBE and the SPI about the vision for a new accountability system and the future roles of the LCAP evaluation rubrics, the API, and the SARC.

xviii On its Web site, CDE indicates the federal Elementary and Secondary Education Act legislation establishes similar requirements for school reporting of certain accountability information, and schools are meeting these requirements through the SARC. For more information, see "Frequently Asked Questions About the School Accountability Report Card" available at http://www.cde.ca.gov/ta/ac/sa/questions.asp.

xix The background materials for Item 2 on SBE's July meeting agenda include a table entitled "The Alignment Between the Eight State Priority Areas and the School Accountability Report Card." This table shows whether each of the state priorities for school district LCAPs is reported in the 2013–14 SARC.

Disseminate Statewide Performance Data

The LCFF legislation doesn't contain explicit requirements for the state to publish statewide performance data for the state priorities for all California schools and students. However, this could be viewed as an implicit aim of the legislation, consistent with its objectives of refocusing the educational system on improving pupil outcomes and making the system more transparent and easily understood by parents, stakeholders, and the public. It also would be a critical feature of a new state accountability framework.

For these reasons, SBE and the SPI should collect statewide performance data for the state priorities and make this information broadly accessible online. Some of this information is already gathered by CDE on a statewide basis, but it could be made more accessible to the public and aligned with the LCAP evaluation rubrics. The Legislature may want to enact legislation with clear direction to SBE and the SPI to publish statewide performance data.

Statewide data is needed to:

- Show the overall performance of California schools and students and highlight successes, as well as unique or persistent challenges, of certain schools and student groups (including trends over time) to inform state educational policies and funding decisions and promote replication of best practices
- Allow LEAs, local stakeholders, and the public to assess the performance of their school districts and schools in a statewide context
- Provide the entities responsible for oversight and support to LEAs with comprehensive and comparable information so they can better assist LEAs and make system improvements as needed
- Help state lawmakers and the public to assess student achievement and school performance under the new funding and accountability policies

From performance data alone, it won't be possible to attribute student outcomes directly to the LCFF reforms. Nonetheless, it will be important to have statewide performance data to track student progress.

Monitor System Implementation

LEA performance for the state priorities is the focus of the new school planning and accountability system, but it is not the only statewide data needed. For the state to provide effective oversight and support for the system, state policy makers will need comprehensive data to assess how LEAs implement the LCFF legislation and whether there are elements of the system that could be improved.

Since SBE has key responsibilities for LCFF implementation, SBE is the most logical entity to lead the collection and dissemination of this information, although it likely will require assistance from other entities, including CDE, which has experience with statewide data collection.

Soon, SBE will provide the Legislature with a report about LCFF implementation thus far; the report is due by February 1, 2015. At a minimum, the report must address these areas:

- Roles and responsibilities of key state entities and others for LCFF oversight and technical assistance to LEAs
- Implementation challenges and efforts by state and local entities to address these challenges
- Observations about the first year that LEAs completed their LCAPs
- A long-term vision for LCFF support and guidance to the field and who will provide that support and guidance

(In addition to SBE's forthcoming report, a few other reports about the first year of LCFF implementation already have been published; citations for these reports are provided in the footnote below.** Also, see "What Stakeholders Report About LCFF Implementation" on pages 26 and 27 for highlights of stakeholder testimony to SBE about LCAPs developed for the 2014–15 school year.)

As a next step, SBE should work with CDE to develop a comprehensive process for the state to monitor statewide LCFF implementation and gather relevant data. (There are

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Daniel C. Humphrey and Julia E. Koppich, "Toward a Grand Vision: Early Implementation of California's Local Control Funding Formula," J. Koppich & Associates, San Francisco, CA, October 2014; Carrie Hahnel, "Building a More Equitable and Participatory School System in California: The Local Control Funding Formula's First Year," The Education Trust–West, Oakland, CA, December 16, 2014; Bruce Fuller and Laura Tobben, "Local Control Funding Formula in California: How to Monitor Progress and Learn From This Grand Experiment," The Chief Justice Earl Warren Institute at University of California, Berkeley, Berkeley, CA, 2014.

about 1,000 school districts, 58 county offices of education, and 1,100 charter schools that must develop and implement LCAPs.) As part of this process, SBE may need to use multiple information gathering strategies and partners, such as CDE, county offices of education, CCEE, academic researchers, and others.

The Legislature should request SBE to describe the process it will use to monitor implementation over time and the comprehensive data it will collect. The Legislature may want to enact legislation to require SBE to gather data about specific implementation issues. Below are several issues SBE and the Legislature should consider.

Local Control and Accountability Plan

- Is the LCAP an effective local planning tool? What are its strengths and weaknesses? How could it be improved?
- Are LEAs following the LCAP template? For example, do LCAPs address all the state priorities? Do they describe specific goals and expected measurable outcomes? Do they provide information for student subgroups?
- In their LCAPs, do LEAs demonstrate an effective use of data and metrics to assess student needs, set goals, and measure progress? For the state priorities that currently lack prescribed state performance measures, do LEAs use their own valid and reliable local measures?

Local Stakeholder Engagement

- ➤ Do LEAs engage their local stakeholders in a robust, meaningful LCAP development process? Do they reach out to parents, students, and other community members who historically have not participated in school planning? Is engagement happening at both the district level and the school site?
- Are local stakeholders pleased with the LCAP process in their communities? How does local stakeholder input shape the content of LCAPs and impact student outcomes?

County Offices of Education Role

- ➤ Do county offices provide effective oversight and support for school district LCAPs? Is there consistency among county offices in how they conduct this work? Do they have the legal authority, training, and capacity to be effective at this role?
- Are county offices approving district LCAPs even if they don't adhere to the LCAP template and the LCFF spending regulations adopted by SBE?

Charter Schools

How is the LCAP process working for charter schools and their authorizers?

Resource Allocation

- What process do LEAs use to allocate their LCFF funding, and how is this different from their past practices? To what extent do LEAs restore prior funding cuts versus allocate funds differently, such as for innovative programs?
- What investments are most effective in producing desired pupil outcomes? Do LEAs change direction and reallocate funds if they aren't improving student outcomes as expected?

Services for High-Needs Pupils

- ➤ Do LEAs comply with the SBE regulations that govern the expenditure of LCFF supplemental funding?
- How do LEAs use the supplemental funding to benefit the high-needs pupils that generate this funding? Under what circumstances is this funding used for districtwide services to all pupils as opposed to services targeting only the high-needs pupils?
- What services and practices are most effective at improving outcomes for the highneeds pupils?

State Role

How are SBE and CDE providing effective support and oversight for new school planning and accountability system? ➤ How will lessons learned from the first year of LCAP development and review inform SBE's work on the evaluation rubrics? How will the rubrics support LEAs in using data and metrics in their LCAPs?

California Collaborative for Educational Excellence

➤ Once operational, how does CCEE assist LEAs statewide?

SUMMING UP: NEXT STEPS FOR THE STATE

While the LCFF legislation shifted significant control over K–12 education funding decisions from the state to LEAs, the state still has a critical role in developing, supporting, and overseeing the new school planning and accountability system. Beyond the state's fundamental duty under the California constitution to oversee its public education system, the LCFF legislation assigns specific responsibilities to SBE and the SPI for implementing key aspects of the new system.

SBE's first major task was to develop and adopt the LCFF regulations, including the LCAP template. It adopted emergency regulations and an initial template in January 2014, followed by a more extensive public process to adopt permanent regulations and a revised template in November. When SBE took the latter action, LEAs and other groups commended the board for its inclusive process to gather a wide range of input and balance multiple perspectives in the final rules. In this way, the board provided LEAs with an example of broad stakeholder engagement.

SBE's next focus: adopting the LCAP evaluation rubrics and helping the state to determine the rubrics' role in California's school accountability system. In addition, the board will need to monitor how LEAs implement the LCFF regulations and the LCAP template to identify areas that warrant improvement or increased support to the field.

CDE, under the SPI's direction, has been assisting SBE in these areas, and fulfilling its own duties under the legislation, including reviewing and approving LCAPs of the county offices of education. Once the new accountability system is further developed, CDE also will need to intervene with any underperforming school districts and county offices of education, pursuant to the authority granted to the SPI.

What Stakeholders Report About LCFF Implementation

As part of its public proceedings on LCFF implementation, SBE received input from various individuals and groups about LCAPs developed for the 2014–15 school year. Below are highlights from stakeholder observations shared with the board. This is a high-level description, not a comprehensive summary of all testimony about the LCAP template and LCFF regulations.

Stakeholders expressed a great deal of optimism about the changes LEAs have begun making under the new planning and accountability system. LEAs were challenged to develop their first LCAPs by July 1, 2014, less than six months after SBE adopted the LCFF emergency regulations and initial LCAP template. Now, with a year of experience behind them and the improved template and regulations SBE adopted in November 2014, LEAs are expected to make further improvements to their planning processes next year.

Representatives from many school districts said the LCAP development process has worked well in their communities. In particular, some noted their district planning had improved by increasing collaboration between district instructional and business staff and increasing local stakeholder engagement. They also recognized they have room for improvement over time, and they look forward to using the forthcoming evaluation rubrics to help them monitor their progress.

Some civil rights, children's advocates, and other groups reviewed LCAPs and/or monitored the LCAP process for select LEAs. While they recognized the accomplishments of LEAs thus far, they also identified areas they believe need improvement by many LEAs including, but not limited to, the following:

- > Set goals for *all* the state priorities and performance measures specified in the law rather than only some of them
- Conduct better needs assessment for pupils, especially for pupil subgroups, to help LEAs identify when unique goals and targeted services are needed for pupil subgroups, since there is a concern that subgroups are not receiving focus in many LCAPs
- > Set *specific* goals with measurable outcomes rather than amorphous goals where progress cannot be tracked
- ➤ Provide baseline data that is necessary to measure progress for the desired outcomes
- ➤ Better align LCAP data with the LCFF revenues in the agency's budget
- Provide greater transparency about how a LEA calculated the amount by which it must increase or improve services to high-needs pupils and how it met this requirement
- ➤ Conduct more robust engagement of local stakeholders in developing LCAPs, since this engagement reportedly varies widely across LEAs

In adopting LCFF permanent regulations in November 2014, SBE made revisions to the LCAP template and related rules that may help address some of these issues. Going forward, SBE should assess whether LEAs improve their LCAPs in these areas.

Advocates for charter schools cited a need for clarity about the law's requirements for charter school LCAPs. In response, the California Department of Education (CDE) has provided additional guidance on its Web site for charter schools.

The California County Superintendents Educational Services Association (CCSESA) described how it has been helping the county offices of education understand and fulfill their new oversight and support role. It also explained how the county offices generally have been assisting school districts to improve their LCAPs. According to CCSESA, county offices provided considerable up-front assistance to districts while they were developing their LCAPs, as well as after the plans were submitted to the county offices for approval. It said county offices saw great diversity among district LCAPs, but it was unclear from this discussion what county offices largely thought of the content and quality of districts' final plans. It noted two key areas for improvement by districts: (1) managing the data collection and analysis required for assessing progress; and (2) managing multiple priorities in their LCAPs, which suggests that some districts did not adequately address all the state priorities.

CDE described its experiences responding to questions from the field about LCAP requirements and approving LCAPs of the county offices of education. Overall, it characterized the first year of LCAP development and review as a learning year for LEAs and the department. CDE said the most notable improvement it expects to see in future LCAPs is greater clarity in the goals and actions that address each of the state priorities for all students and each student group.

Going forward, SBE and the Legislature should continually assess how the new planning and accountability system is working and how it could be improved. The LCFF legislation created a promising new framework that is in many ways groundbreaking. It shouldn't be surprising if further regulatory and statutory changes are needed to refine this framework, consistent with the objectives for the LCFF, as California gains more experience with it.

This report has identified some of the areas that will require further state action. Key considerations and recommendations in these areas were described throughout the report. A summary of the recommendations is on pages 28 and 29.

Summary of Recommendations for State Policy Makers

The state has a critical role in developing, supporting, and overseeing the new school planning and accountability system. The following recommendations for further state action are intended to help California schools realize the full promise of the Local Control Funding Formula (LCFF) legislation. Most of the recommendations pertain to the State Board of Education (SBE), the Superintendent of Public Instruction (SPI), and the California Department of Education (CDE) since the legislation tasked them with primary responsibilities for LCFF implementation. Some of the recommendations are directed to the Legislature since further legislation may be necessary in these areas.

- Help Local Educational Agencies (LEAs) Build Capacity for Effective Planning and Continuous Improvement. The California Collaborative for Educational Excellence (CCEE) now has a governing board, but it is unclear when CCEE will be able to describe its vision and plan for assisting LEAs to develop and implement high-quality local control and accountability plans (LCAPs). In the upcoming months, the Legislature should engage CCEE, as well as SBE and the SPI, in discussions about CCEE's role and a vision and plan for its work. Some ideas for how CCEE could assist LEAs include: (1) identifying best practices for addressing the state priorities and serving high-needs pupils; (2) helping LEAs to implement effective models of stakeholder engagement and use data and metrics to focus their planning on continuous improvement; (3) facilitating collaborations of LEAs jointly focused on one or more common issues; and (4) assisting school districts and schools to evaluate their programs through an intensive "school quality review" process, which state law envisions LEAs may conduct as part of their local evaluation efforts. Besides providing funding for CCEE, the Legislature also may want to consider making other targeted investments of Proposition 98 funding to help LEAs build capacity in specific areas of need.
- Develop the Local Control and Accountability Plan Evaluation Rubrics. For consistent measurement of the state priorities across LEAs and the ability to aggregate local performance data for the state as a whole, the evaluation rubrics adopted by SBE should include uniform state measures to the extent possible. In addition, SBE and the SPI should identify current measurement gaps for the state priorities and options for the state to develop new or improved measures to address the gaps. The Legislature may want to consider providing funding to SBE and CDE to evaluate potential new state measures for the rubrics.

- Report Individual School District and School Performance Based on the Evaluation Rubrics. As part of the rubrics, SBE should design a new accountability tool (or tools) for reporting individual school district and school performance data for the state and local priorities (similar to what some call a "data dashboard" or "dashboard of performance indicators"). The tool should be easily accessible to parents, stakeholders, and the public and enable comparison of information across districts and schools. Ideally, the tool also would clearly indicate whether an LEA warrants technical assistance or intervention, consistent with the criteria established in the LCFF legislation. If such a tool is not part of the rubrics, the Legislature should consider enacting legislation to require SBE to work with CDE to develop such a tool. In addition, the Legislature should have discussions with SBE and the SPI about the vision for a new state accountability system and the future roles of the evaluation rubrics, the Academic Performance Index (API), and the School Accountability Report Card (SARC). Once the rubrics are developed, will the API and the SARC be relevant? How might they be aligned to the rubrics? The state may want to replace the API with an accountability system focused on multiple statewide measures from the rubrics. Another option is to broaden API to include multiple measures. Potentially, the SARC could be aligned with the rubrics to create an improved online accountability tool that provides both districtlevel and school-level data for the state and local priorities.
- Disseminate Statewide Performance Data. To inform state and local policies related to continuous school improvement, SBE and the SPI should aggregate local performance data for the state priorities for all California schools and students and make this information broadly accessible online. While the LCFF legislation doesn't contain explicit requirements for the state to publish statewide performance data, this could be viewed as an implicit aim of the legislation, consistent with its objectives of refocusing the educational system on improving pupil outcomes and making the system more transparent and easily understood by parents, stakeholders, and the public. The Legislature may want to enact further legislation to require SBE and the SPI to publish statewide performance data.
- Monitor System Implementation. For proper oversight and support of the school planning and accountability system, SBE should work with CDE to develop a comprehensive process to monitor how LEAs implement the LCFF legislation and identify any elements of the system that could be improved. This may require SBE to use multiple information gathering strategies and partners, such as CDE, county offices of education, CCEE, academic researchers, and others. The Legislature should request SBE to describe the process it will use to monitor implementation over time and the comprehensive data it will collect. The Legislature may want to enact legislation to require SBE to gather data for specific implementation issues. This report identifies several issues SBE and the Legislature should consider; see pages 23 through 25 for a list of these issues.

Written by Jody Martin. The California Senate Office of Research is a nonpartisan office charged with serving the research needs of the California State Senate and assisting Senate members and committees with the development of effective public policy. It was established by the Senate Rules Committee in 1969. For more information and copies of this report, please visit http://sor.senate.ca.gov/ or call **(916) 651-1500.**