California Department of Education

Executive Office

SBE-002 (REV. 11/2017)

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# MEMORANDUM

**DATE:**  November 30, 2020

**TO:** MEMBERS, California Practitioners Advisory Group

**FROM:**  STAFF, California Department of Education

**SUBJECT:** Senate Bill 820 Education Finance: Overview of the Revision of the Template and Instructions for the Annual Update to the 2021–22 Local Control and Accountability Plan

## Item Summary

On September 18, 2020, Governor Newsom signed Senate Bill 820: Education Finance. Among other things, SB 820 requires the State Superintendent of Public Instruction (Superintendent), in consultation with the Executive Director of the State Board of Education (SBE), to revise the Template and Instructions for the Annual Update to the 2021–22 Local Control and Accountability Plan (LCAP) by January 31, 2021 to include the actions and expenditures from both the Learning Continuity and Attendance Plan (Learning Continuity Plan) and the 2019–2020 LCAP.

**The LCAP Planning Process**

In a typical year, local educational agencies (LEAs), which include all school districts, county offices of education (COEs), and charter schools, develop and adopt an LCAP, pursuant to California *Education Code* (*EC*) sections 47606.5, 52061, and 52066. As part of the LCAP, LEAs are required to provide an Annual Update to the LCAP (*EC* sections 47606.5, 52061, and 52066) and a budget summary document known as the Local Control Funding Formula (LCFF) Budget Overview for Parents (Budget Overview for Parents). The LCAP must be developed with input from stakeholders and LEAs are required to use the template and instructions adopted by the SBE to complete the LCAP.

In the Annual Update, LEAs are required to report on the progress made towards achieving each of the goals in the prior-year LCAP, the implementation of actions planned to support the goals, the estimated actual expenditures for the actions, and a description of how this analysis has informed the development of the LCAP for the coming year. In the Budget Overview for Parents, LEAs provide an overview of their anticipated revenue and budgeted expenditures in the coming year, as well as how the LEA met its requirement to increase or improve services for students who are low income, English learners, or foster youth.

The LCAP, including the Annual Update and the Budget Overview for Parents, is required to be adopted by the local governing board of a school district or COE or the local governing body of a charter school on or before July 1 of each year at the same meeting at which the governing board or governing body adopts the LEAs annual budget for the coming year.

**Impact of COVID-19 on the 2020–21 LCAP Planning Process**

The impact of the COVID-19 pandemic on students, families, and communities throughout California has been profound. Within the educational system, LEAs have been forced to adapt on a week-by-week basis to a myriad of evolving needs, policies, and procedures, while attempting to ensure adequate support and resources for students, teachers and staff, and planning for an uncertain future. The following timeline and overview of key changes enacted over the past nine months summarizes relevant changes to the 2020–21 LCAP planning process.

On April 22, 2020, Governor Newsom signed Executive Order (EO) N-56-20 (~~https://www.gov.ca.gov/wp-content/uploads/2020/04/EO-N-56-20-text.pdf~~) [The preceding link is no longer available.], which:

* Waived certain LCAP-related budgetary requirements, including the requirement to adopt the 2020–21 LCAP prior to adopting the 2020–21 budget and the requirement to include the 2020–21 LCAP expenditures in the 2020–21 budget.
* Delayed implementation of the three-year LCAP template adopted by the SBE at its January 2020 meeting until the 2021–22 through 2023–24 school years.
* Extended the submission deadline for the 2020–21 LCAP and the Budget Overview for Parents from July 1, 2020 to December 15, 2020.
* Established the Operations Written Report (OWR), which required LEAs to provide an overview of changes to its program offerings that were made in response to the COVID-19 outbreak, including the major impacts on students and families and how the LEA was meeting the needs of its unduplicated students. LEAs were also required to include steps they had taken to deliver high-quality distance learning opportunities, provide school meals in a non-congregate setting, and arrange for supervision of students during ordinary school hours. Governing boards or governing bodies were required to adopt the report with the LEA budget on or before July 1, 2020.

On June 29, 2020, Governor Newsom signed SB 98 Education Finance: Education Omnibus Budget Trailer Bill (<http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB98>), which, among other things:

* Removed the requirement of EO N-56-20 for LEAs to develop and adopt an LCAP by December 15, 2020.
* Removed the requirement for LEAs to develop and adopt the OWR by July 1, 2020.
* Added *EC* Section 43509, which created the requirement for LEAs to develop and adopt a Learning Continuity and Attendance Plan (Learning Continuity Plan) for the 2020–21 school year. *EC* Section 43509 required:
  + The Superintendent, in consultation with the Executive Director of the SBE, to develop a template and instructions for the Learning Continuity Plan by August 1, 2020; and
  + Required LEAs to adopt a Learning Continuity Plan by September 30, 2020.
  + On July 2, 2020, the California Department of Education (CDE) provided the SBE with an overview of the Learning Continuity and Attendance Plan provisions in an Information Memorandum (<https://www.cde.ca.gov/be/pn/im/documents/jul20memosasd01.docx>).
* Required the Superintendent, in consultation with the Executive Director of the SBE, to update the template and instructions for the Budget Overview for Parents to reference the Learning Continuity Plan, as applicable, by September 15, 2020. SB 98 retained the requirement for LEAs to adopt the Budget Overview for Parents by December 15, 2020.
* Specified that the Annual Update to the 2021––22 LCAP include the actions and expenditures included in the Learning Continuity Plan.

On September 18, 2020, Governor Newsom signed SB 820: Education Finance (<http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB820>), which:

* Clarified that the Annual Update to the 2021–22 LCAP is required to include the actions and expenditures included in both the Learning Continuity Plan and the 2019–2020 LCAP.
* Requires the Superintendent, in consultation with the Executive Director of the SBE, to revise the Template and Instructions for the Annual Update to the 2021–22 LCAP before January 31, 2021, to include the Learning Continuity Plan and the LCAP adopted for the 2019–2020 school year.

**Revision Process and Timeline**

The CDE created a draft of the 2021–22 Annual Update Template and Instructions (Version 1) and presented it to a variety of stakeholders through virtual meetings and webinars. While the timeline for collecting stakeholder input to inform the development of the 2021–22 Annual Update Template and Instructions is, by necessity, compressed, the CDE has conducted multiple stakeholder engagement input sessions to obtain feedback and generate ideas:

**October 19, 2020:** Presentation of the Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 1, to the LCAP Advisory Committee.

**October 22, 2020:** Presentation of the Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 1, to the LCFF Equity Coalition.

**October 27, 2020:** Presentation of the Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 1, for stakeholder input and feedback during a Tuesday@2 webinar.

As of the posting of this memo, the following opportunities for stakeholder engagement have been scheduled:

**December 2, 2020:** Presentation of the revised Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 2, to the LCAP Advisory Committee Meeting

**December 11, 2020:** Presentation of the revised Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 2, to the California Practitioners Advisory Group (CPAG).

**December 14, 2020:** Presentation of the Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 2, to the LCFF Equity Coalition.

**December 15, 2020:** Presentation of the revised Draft Template and Instructions for the 2021–22 LCAP Annual Update, Version 2, for stakeholder input and feedback during a Tuesday@2 webinar.

## Attachment(s)

* Attachment 1: Annual Update for the 2019–20 Local Control and Accountability Plan Year (3 pages)
* Attachment 2: Draft Annual Update for the 2019–20 Local Control and Accountability Plan Year, Version 1 (11 pages)
* Attachment 3: Summary of Stakeholder Feedback (4 pages)
* Attachment 4: October 27, 2020 Tuesday @ 2 Chat (18 pages)
* Attachment 5: Stakeholder Feedback from LCFF Inbox (11 pages)
* Attachment 6: Letter from the LCFF Education Equity Coalition (11 pages)
* Attachment 7: Draft Template and Instructions for the 2021-22 LCAP Annual Update. This attachment will be provided as an Item Addendum.

## Attachment 1: Annual Update for the 2019–20 Local Control and Accountability Plan Year

Complete a copy of the following table for each of the local educational agency’s (LEA’s) goals from the prior year Local Control and Accountability Plan (LCAP). Duplicate the table as needed.

## Goal 1

[Describe goal here]

State and/or Local Priorities addressed by this goal:

State Priorities: [List State Priorities Here]

Local Priorities: [Add Local Priorities Here]

**Annual Measurable Outcomes**

| Expected | Actual |
| --- | --- |
| [Add expected outcome here] | [Add actual outcome here] |
| [Add expected outcome here] | [Add actual outcome here] |
| [Add expected outcome here] | [Add actual outcome here] |

**Actions / Services**

Duplicate the Actions/Services from the prior year LCAP and complete a copy of the following table for each. Duplicate the table as needed.

**Action 1**

| Planned  Actions/Services | Actual  Actions/Services | Budgeted  Expenditures | Estimated Actual Expenditures |
| --- | --- | --- | --- |
| [Add planned actions/services here] | [Add actual actions/services here] | [Add budgeted expenditures here] | [Add estimated actual expenditures here] |

**Analysis**

Complete a copy of the following table for each of the LEA’s goals from the prior year LCAP. Duplicate the table as needed. Use actual annual measurable outcome data, including performance data from the Local Control Funding Formula (LCFF) Evaluation Rubrics, as applicable.

Describe the overall implementation of the actions/services to achieve the articulated goal.

[Add text here]

Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA.

[Add text here]

Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard, describe the relationship of this goal and related metrics and actions with the development of new goals in the 2020–23 LCAP, as applicable.

[Add text here]

**Instructions**

**Annual Update**

The planned goals, expected outcomes, actions/services, and budgeted expenditures must be copied verbatim from the previous year’s approved LCAP; in addition, list the state and/or local priorities addressed by the planned goals. Minor typographical errors may be corrected.

**Annual Measurable Outcomes**

For each goal in the prior year, identify and review the actual measurable outcomes as compared to the expected annual measurable outcomes identified in the prior year for the goal.

**Actions/Services**

Identify the planned Actions/Services and the budgeted expenditures to implement these actions toward achieving the described goal. Identify the **actual** actions/services implemented to meet the described goal and the estimated actual annual expenditures to implement the actions/services. As applicable, identify any changes to the students or student groups served, or to the planned location of the actions/services provided.

**Analysis**

Using actual annual measurable outcome data, including data from the California School Dashboard, analyze whether the planned actions/services were effective in achieving the goal. Respond to the prompts as instructed.

* Describe the overall implementation of the actions/services to achieve the articulated goal. Include a discussion of relevant challenges and successes experienced with the implementation process.
* Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard, describe the relationship of this goal and related metrics and actions with the development of new goals in the 2020–23 LCAP, as applicable

## Attachment 2: Draft Annual Update for the 2019–20 Local Control and Accountability Plan Year, Version 1

| **Local Educational Agency (LEA) Name** | **Contact Name and Title** | **Email and Phone** |
| --- | --- | --- |
| [Insert LEA Name here] | [Insert Contact Name and Title here] | [Insert Email and Phone here] |

Complete a copy of the following table for each of the local educational agency’s (LEA’s) goals from the 2019-20 Local Control and Accountability Plan (LCAP). Duplicate the table as needed.

**Goal 1**

[Describe goal here]

State and/or Local Priorities addressed by this goal:

State Priorities: [List State Priorities Here]

Local Priorities: [Add Local Priorities Here]

**Annual Measurable Outcomes**

| Expected | Actual |
| --- | --- |
| [Add expected outcome here] | [Add actual outcome here] |
| [Add expected outcome here] | [Add actual outcome here] |
| [Add expected outcome here] | [Add actual outcome here] |

**Actions / Services**

Duplicate the Actions/Services from the 2019-20 LCAP and complete a copy of the following table for each. Duplicate the table as needed.

| **Planned  Action/Service** | **Actual  Action/Service** | **Budgeted  Expenditures** | **Estimated Actual Expenditures** |
| --- | --- | --- | --- |
| [Add planned action/service here] | [Add actual action/service here] | [Add budgeted expenditures here] | [Add estimated actual expenditures here] |
| [Add planned action/service here] | [Add actual action/service here] | [Add budgeted expenditures here] | [Add estimated actual expenditures here] |

**Analysis**

Complete a copy of the following table for each of the LEA’s goals from the 2019-20 LCAP. Duplicate the table as needed. Use actual annual measurable outcome data, including performance data from the Local Control Funding Formula (LCFF) Evaluation Rubrics, as applicable.

Describe the overall implementation of the actions/services to achieve the articulated goal.

[Add text here]

Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA.

[Add text here]

Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard, describe the relationship of this goal and related metrics and actions with the development of new goals in the 2021–24 LCAP, as applicable.

[Add text here]

**Annual Update for the 2020–21 Learning Continuity and Attendance Plan**

**In-Person Instructional Offerings**

**Actions Related to In-Person Instructional Offerings**

| Description | Total Budgeted Funds | Estimated Actual Expenditures | Contributing |
| --- | --- | --- | --- |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |

[Additional rows and actions may be added as necessary]

**Analysis of In-Person Instructional Offerings**

A description of the successes and challenges experienced in implementing in-person instruction in the 2020-21 school year, as applicable.

[Add text here]

A description of any substantive differences in planned actions and actual implementation of the actions.

[Add text here]

An explanation of material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

An explanation of how lessons learned from implementing in-person instruction have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

[Add text here]

**Distance Learning Program**

**Actions Related to the Distance Learning Program**

| Description | Total Budgeted Funds | Estimated Actual Expenditures | Contributing |
| --- | --- | --- | --- |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |

[Additional rows and actions may be added as necessary]

**Analysis of** **the Distance Learning Program**

A description of the successes and challenges experienced in implementing distance learning in the 2020-21 school year in each of the following areas, as applicable: Continuity of Instruction, Access to Devices and Connectivity, Pupil Participation and Progress, Distance Learning Professional Development, Staff Roles and Responsibilities, and Supports for Pupils with Unique Needs.

[Add text here]

A description of any substantive differences in planned actions and actual implementation of these actions.

[Add text here]

An explanation of material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

An explanation of how lessons learned from implementing distance learning have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

[Add text here]

**Pupil Learning Loss**

**Actions Related to the Pupil Learning Loss**

| Description | Total Budgeted Funds | Estimated Actual Expenditures | Contributing |
| --- | --- | --- | --- |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |
| [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |

[Additional rows and actions may be added as necessary]

**Analysis of** **Pupil Learning Loss**

A description of the successes and challenges experienced in addressing Pupil Learning Loss in the 2020-21 school year, as applicable.

[Add text here]

A description of any substantive differences in planned actions and actual implementation of these actions.

[Add text here]

An explanation of material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

An explanation of how lessons learned from addressing Pupil Learning Loss have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

[Add text here]

**Additional Actions and Plan Requirements**

**Additional Actions to Implement the Learning Continuity Plan**

| Section | Description | Total Budgeted Funds | Estimated Actual Expenditures | Contributing |
| --- | --- | --- | --- | --- |
| [The section of the Learning Continuity Plan related to the action described; may put N/A if the action does not apply to one specific section] | [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |
| [The section of the Learning Continuity Plan related to the action described; may put N/A if the action does not apply to one specific section] | [Description of the action] | [$ 0.00] | [$ 0.00] | [Y/N] |

[Additional rows and actions may be added as necessary]

**Analysis of** **Additional Actions and Plan Requirements**

A description of the successes and challenges experienced in monitoring and supporting Mental Health and Social and Emotional Well-Being, implementing Pupil and Family Engagement and Outreach, and providing School Nutrition in the 2020-21 school year, as applicable.

[Add text here]

A description of any substantive differences in planned actions and actual implementation of these actions.

[Add text here]

An explanation of material differences between Budgeted Expenditures and Estimated Actual Expenditures.

[Add text here]

An explanation of how lessons learned from implementing additional actions and plan requirements have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

[Add text here]

**Instructions for the Draft Annual Update for the 2019–20 Local Control and Accountability Plan Year, Version 1:**

**Annual Update**

The planned goals, expected outcomes, actions/services, and budgeted expenditures must be copied verbatim from the 2019-20 approved LCAP; in addition, list the state and/or local priorities addressed by the planned goals. Minor typographical errors may be corrected.

**Annual Measurable Outcomes**

For each goal in 2019-20, identify and review the actual measurable outcomes as compared to the expected annual measurable outcomes identified in 2019-20 for the goal.

**Actions/Services**

Identify the planned Actions/Services and the budgeted expenditures to implement these actions toward achieving the described goal. Identify the **actual** actions/services implemented to meet the described goal and the estimated actual annual expenditures to implement the actions/services. As applicable, identify any changes to the students or student groups served, or to the planned location of the actions/services provided.

**Analysis**

Using actual annual measurable outcome data, including data from the California School Dashboard, analyze whether the planned actions/services were effective in achieving the goal. Respond to the prompts as instructed.

* Describe the overall implementation of the actions/services to achieve the articulated goal. Include a discussion of relevant challenges and successes experienced with the implementation process.
* Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard, describe the relationship of this goal and related metrics and actions with the development of new goals in the 2021–24 LCAP, as applicable

**Instructions for the Annual Update for the 2020–21 Learning Continuity and Attendance Plan:**

**Annual Update**

The action descriptions and budgeted expenditures must be copied verbatim from the 2020-21 Learning Continuity and Attendance Plan. Minor typographical errors may be corrected.

**For Actions throughout the Learning Continuity and Attendance Plan**

Identify the planned actions and the budgeted expenditures to implement these actions. Identify the estimated actual expenditures to implement the actions.

**Analysis of In-Person Instructional Offerings**

Using state and/or local data and feedback from stakeholders, analyze the implementation of in-person instruction in the 2020-21 school year, as applicable.

* Describe the successes and challenges experienced in implementing in-person instruction in the 2020-21 school year, including the effectiveness of protocols to ensure the safety of students and staff. If in-person instruction was not provided to any students in 2020-21, please state as such.
* Describe any substantive differences in planned actions and actual implementation of the actions.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Explain how lessons learned from implementing in-person instruction have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

**Analysis of the Distance Learning Program**

Using state and/or local data and feedback from stakeholders, analyze the implementation of distance learning in the 2020-21 school year, as applicable.

* Describe the successes and challenges experienced in implementing distance learning in the 2020-21 school year in each of the following areas, as applicable: Continuity of Instruction, Access to Devices and Connectivity, Pupil Participation and Progress, Distance Learning Professional Development, Staff Roles and Responsibilities, and Supports for Pupils with Unique Needs. If distance learning was not provided to any students in 2020-21, please state as such.
* Describe any substantive differences in planned actions and actual implementation of the actions.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Explain how lessons learned from implementing distance learning have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

**Analysis of Pupil Learning Loss**

Using state and/or local data and feedback from stakeholders, analyze the how the LEA addressed pupil learning loss in the 2020-21 school year, as applicable.

* Describe the successes and challenges experienced in addressing Pupil Learning Loss in the 2020-21 school year, as applicable.
* Describe any substantive differences in planned actions and actual implementation of the actions.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Explain how lessons learned from addressing Pupil Learning Loss have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

**Analysis of Additional Actions and Plan Requirements**

Using state and/or local data and feedback from stakeholders, analyze the how the LEA addressed Additional Actions and Plan Requirements in the 2020-21 school year, as applicable.

* A description of the successes and challenges experienced in monitoring and supporting Mental Health and Social and Emotional Well-Being, implementing Pupil and Family Engagement and Outreach, and providing School Nutrition in the 2020-21 school year, as applicable. If School Nutrition was not provided to any students in 2020-21, please state as such.
* Describe any substantive differences in planned actions and actual implementation of the actions.
* Explain material differences between Budgeted Expenditures and Estimated Actual Expenditures. Minor variances in expenditures or a dollar-for-dollar accounting is not required.
* Explain how lessons learned from addressing additional actions and plan requirements have informed the development of goals and actions in the 2021–24 LCAP, as applicable.

## Attachment 3: Summary of Stakeholder Feedback

A summary of the feedback provided for the Draft Template and Instructions for the 2021-22 LCAP Annual Update, Version 1, during stakeholder input sessions is provided below.

* There is concern about the length of the Template and the potential for the Annual Update to increase the size of the LCAP, making the plan unwieldy for stakeholders and reviewers alike.
* It was noted that the OWR provided LEAs with the opportunity to update stakeholders about how their plans had changed in response to COVID-19, making the Annual Update duplicative of work that has already been done.
* There is concern about the capacity of LEAs, especially small districts and single-school districts, to complete a thorough analysis during this unprecedented time. There were many requests to make the Template and Instructions as streamlined as possible to allow LEAs to continue focusing on supporting students and families, continuing to refine distance learning and planning for or implementing a return to in-person learning.
* There are concerns about reporting outcomes for goals in the 2019-20 Annual Update, as many of the annual measurable outcomes within LCAPs were tied to state indicators reported in the California School Dashboard (Dashboard). Given that state and local indicators will not be reported on the Dashboard for 2019-20, there may not be sufficient data to inform analyses. It was also noted that an analysis of partial year data would create significantly more work for LEAs and has been hampered by the interruption of local data collection due to school closures.
* There is concern that an analysis of material differences between budgeted and actual expenditures would be of little value due to the significant resource reallocations necessitated by the shift to distance learning and may lead to confusion among stakeholders.
* As the Mental Health and Social-Emotional Well-Being, Pupil and Family Engagement and Outreach, and School Nutrition sections from the Learning Continuity Plan did not have individual action tables associated with them in the Learning Continuity Plan, there was concern expressed that the actions LEAs are using to support students and families in these areas will be omitted from the analyses in the Annual Update.
* There is concern that LEAs will not fully analyze and update the actions indicated at contributing towards the LEAs requirement to increase or improve services for students who are low income, English learners, and foster youth, as the Template for the Learning Continuity Plan did not require LEAs to include all of the actions contributing towards this requirement in the Action tables within the template.
* It was noted that Coronavirus Aid, Relief, and Economic Security (CARES) Act funds were not accounted for in the Learning Continuity Plan and there is a desire to see them accounted for in the Annual Update to the Learning Continuity Plan.
* To prevent duplicative work and eliminate redundancy, it was suggested that analysis questions 2 and 4 in the Template and Instructions for the Annual Update to the 2019-20 LCAP be removed.
* There were also suggestions to remove and/or combine some of the analysis questions in the Template and Instructions for the Annual Update to the Learning Continuity Plan to make the template more streamlined. Examples include a suggestion to remove analysis question 4 and combine analysis questions 2 and 3 or combining analysis questions 2 and 4 because they complement each other.
* Instead of responding to analysis questions for each action from the 2019-20 LCAP, there it was suggested that each goal from the 2019-20 LCAP be analyzed holistically and responding to the analysis questions for the goals versus the individual actions.
* There were suggestions for completing analysis questions solely for the Annual Update to the Learning Continuity Plan. It was noted that it would be more valuable to provide a brief summary of the 2019-20 LCAP implementation instead of completing a deep analysis of outdated information from the 2019-20 LCAP.
* It was suggested that, if the actual measurable outcomes remain in the 2019-20 Annual Update, there be an option to respond with “Not Applicable” when actual outcomes cannot be measured.
* It was requested that the Template require an update of each action/service implemented prior to school closures.
* It was requested that the Template and Instructions for the Annual Update to the Learning Continuity Plan require discussion of actual outcomes pre- and post-March 2020 to account for changes in outcomes as a result of school closures and distancing learning due to COVID-19.
* While recognizing that Dashboard indicators would not be available for the 2019-20 school year, it was requested that the Template and Instructions for the Annual Update to the 2019-20 LCAP include a requirement to use local data to report actual measurable outcomes for 2019-20.
* It was suggested that the Template and Instructions for the Annual Update to the 2019-20 LCAP prompt inclusion of any actions implemented in response to COVID-19 that were not included in the 2019-20 LCAP.
* It was suggested that the analysis portions of the Template and Instructions for the Annual Update to the Learning Continuity Plan include reference to the specific student groups described in the Learning Continuity Plan and should require analysis of data specific to these student groups to identify learning loss.
* It was suggested that a column be added in each action table in the Template for the Annual Update to the Learning Continuity Plan to specify the funding source(s) for each action (i.e. LCFF funds, CARES Act funds, other federal funds, etc.).
* It was suggested to add an additional action table to the Template for the Annual Update to the Learning Continuity Plan and include corresponding instructions requiring LEAs to report on actions that were described in the narrative sections but not memorialized as actions.
* It was suggested that all components of the Distance Learning Program areas be broken out into their own subsections for response in the Template for the Annual Update to the Learning Continuity Plan.

## Attachment 4: October 27, 2020 Tuesday @ 2 Chat

On October 27, 2020 the Draft Template and Instructions for the 2021-22 Local Control and Accountability Plan (LCAP) Annual Update, Version 1, was presented for stakeholder input and feedback during a Tuesday@2 webinar. The chat from that webinar, provided below, provides the feedback, thoughts, and insights from participants.

Note: participant names and comments and questions that are not germane to the 2021-22 LCAP Annual Update, Version 1, have been redacted.

Start of webinar at 14:00:00 (2:00 p.m.)

14:00:21 The initial draft of the Template and Instructions is available at https://drive.google.com/drive/folders/1cIKYm3hJNTA2DrQp5rqZFXUb5CUB4Q-R?usp=sharing

14:03:37 The template looks like a summary for current planning relating to in person and distance. is there a 21/22 proposed LCAP template.

14:05:47 The order of the Analysis prompts are different between LCAP and Learning Continuity and Attendance Plan (LCP). The first to prompts should be "flipped" for LCP. This way the order for both will be (1) Implementation (2) Effectiveness [successes and challenges] (3) material differences, (4) changes

14:10:42 Do you have a date that it will be finalized?

14:11:57 There are several data points that will not have actual outcomes to report

14:12:04 Student outcomes may be difficult to gather

14:12:09 The Annual Update (AU) Template will be finalized by January 31, 2121.

14:12:13 Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the Local Educational Agency (LEA) look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?

14:12:18 Some of our outcomes are not available, such as results of International Baccalaureate (IB) exams- which were cancelled

14:12:27 What about the outcomes that we don’t have data for due to the pandemic (i.e. [California Assessment of Student Performance and Progress (CAASPP)] testing)?

14:12:36 Agreed [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the Local Educational Agency (LEA) look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]

14:12:57 Will metrics be waived due to state requirements for data collection being waived by the Federal Government?

14:13:00 Is there a tentative deadline for the template to be released to LEA's?

14:13:04 It needs to be removed

14:13:12 This seems crazy we have to go back to Fiscal Year (FY) 2020. This is making it much harder with the LCP and other new requirements. Nothing is seeming to have been made simpler.

14:13:28 I agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?].

14:13:33 Looking at the previous Annual Update- We listed the Metric/Baseline/Expected and Actual. Seems like there isn't a place for the Metric Description and Baseline

14:13:42 I agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]

14:13:46 With respect to the Actions/services, the analysis questions are appropriate, but the line by line item of the actions/services planned does not seem as effective now. A recommendation is to considering removing the individual line items and keep the analysis questions.

14:13:51 Many of our outcomes will not be available for 19-20.

14:14:22 Agreed. There really is no correlation at this time. It feels like busy work instead of useful information.

14:14:28 Does the law require LEAs to report out on the 2019-2020 LCAP?

14:14:28 Please remove the 19-20 stuff, that is superfluous at this point and not a good use of our time.

14:14:33 I agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?] as well.

14:14:37 Might have overall implementation statements of due to COVID, unable to implement. Could imagine most districts would write this and why would we ask them to write this over and over again?

14:14:37 I also agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]

14:14:50 Agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]

14:14:57 That's a great idea [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]!

14:15:06 Agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?]. Very time consuming

14:15:35 The Annual Update section of the 20-21 LCP seems burdensome and redundant. Does statue require this?

14:15:39 The data in 2019 - 2020 is compromised by school closures and cannot be comparable to any other year. As such, responding to prompts seems appropriate rather than reporting all of the data, some of which will unavailable. Any relevant data can be described in a narrative. The 2021-2024 LCAP should provide district's a fresh start, post-COVID, hopefully.

14:15:52 That is a lot of duplicating of work to put all of the items from more than one document into yet another document. If things are online, wouldn’t it be better to hyperlink it?

14:16:09 For Action / services, should it be "Actual Expenditure" or "Estimated Actuals"? Since this is for 2019-20 and LEAs have Actual expenditures, I am assuming it will be actual expenses.

14:16:17 I would agree with [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?].

14:16:29 Are metrics required in the 2019-2020 annual update?

14:16:35 Please make the analysis for 19-20 brief since it is outdated at this point and many metrics were sidelined due to COVID

14:16:39 So - the annual update will be actually two annual updates. (19/20 & 20/21) -

14:16:46 Since the physical school closures, we've [developed] the OWR, then Continuity Plan, now typical LCAP... lots has happened since when we were supposed to have our typical 2019-20 Annual Update

14:16:56 I thought that the COVID-19 Operations Written Report also helped speak to how our plans changed when schools closed. Would the 19-20 Annual Update be focused on the first 7 months of 19-20, before the COVID pandemic?

14:16:59 Analysis of what state verifiable data?

14:17:08 Districts and staff are reeling with keeping up. I see two things: 1. annual update to learning continuity plan. 2. draft template for 21/22 LCAP. the LCP will handle current year. spending all that time to fill out a form disconnected to where we are is, in my opinion, a waste of tax payer resources in manpower. I do understand our accountability to the LCP in current year, and planning for next year

14:17:33 I agree, I don't see the relevance of 19/20 data. It would be compliance driven and burdensome to our small districts with limited time and resources.

14:17:36 Analysis seems to be silly without true data

14:17:49 I agree that with so many missing metrics for things that were just not able to happen could skew data, corrupt understanding, and really confuse stakeholders who don’t know the lingo or have the full information or understanding of the process.

14:17:49 My Business Office is going to flip when I show them this. They are slammed already.

14:17:50 Seems like a statement in the instructions since we know schools have been challenged to specifically address these actions and outcomes, districts could report as of March 1, 2020

14:18:00 Likewise, I don't see the relevance to reporting on 19/20 data.

14:18:19 Many of the metrics for 19-20 are obsolete - how do we respond?

14:18:20 Analysis will be based on the completion of each individual action. Some actions are positions that had to be revised to support students during the COVID shut downs, all of this was already reported in the Learning Continuity Plan. If we can avoid the repeated reporting that would be great.

14:18:39 Perhaps there is a way to limit the 19/20 AU to just affirm any progress made on actions and goals

14:19:22 Understand the Statutory requirement, but it seems it may be a daunting task to not only do the Annual Update (for 2 years), but also a 3-yr LCAP for 2021/22, 2022/23, 2023/24...This will be a struggle for many districts.

14:19:28 Could the instructions provide guidance on what academic year the LEA should report Actual Annual Measurable Outcome

14:19:30 It feels now that we are reopening the "in-Person" Analysis would be similar to the Annual Update Analysis for LCAP because those were the actions/services we had completed and informed what continued. For me it feels like duplicate work. The distance learning piece is new and this makes sense to do an analysis but not two analysis - unless the perspective…

14:19:40 I agree why complete this 2019-2020 update if we already completed the LCP in place of LCAP.

14:19:42 I agree with everything people are saying about the difficulty of piecing together data and actions from 2029-20. And not relevant moving forward in light of the pandemic.

14:19:48 I like [Since the actions in the 19-20 AU were written almost 2 years ago, it seems burdensome to have districts report out on each action in actual actions/services. Could it mirror the updated 21-22 template? Could the LEA look at the goal as a whole and respond only to the 4 analysis questions and include an expenditure table for the 19-20 AU?].

14:19:54 Concerned about reporting on 19-20 actuals when we had additional funding kick in from various sources that were outside of LCFF

14:19:56 We will have to determine how all of our actions will need to be revised as a result of COVID.

14:19:56 Yes, using the LCP as the annual update in the 2020/2021 would be relevant to the work being done.

14:19:58 So many things have changed

14:20:20 So the LCAP due in June 2021 would have an Annual Update for 2019-20 (LCAP) AND the 2020-21 Annual Update (LCP) in addition to the 3-year LCAP for the next 3 years?

14:20:25 Is it possible to exclude the 19-20 Annual Update portion? Seems like it will not be meaningful to LEAs or stakeholders and really undermine the engagement we have all been trying to generate around a meaningful LCAP plan and process.

14:20:29 For clarity, LEAs will be responsible for addressing the Annual Update for 19-20, the update of the LCP, and the 3-year LCAP plan, correct?

14:20:33 Will this annual update reflect 19/20 data? Only through school closures, understanding it's not representative of a full year?

14:20:33 This proposal spans too great of a period. Schools are still in such a change and who knows what the spring will bring. The plan should be focused on less years. The Continuity Plan, while extensive, covered a single year. This plan is to ambitious.

14:20:40 For 19/20 to be relevant at all it needs to be global, a summary of the goal with identification of any actions that are pushing forward into the new LCAP.

14:20:48 I understand giving an update to funds allocated in the LCP but have a hard time understanding the analysis of it being required. Why weren't there goals required if there needs to be an annual update and analysis of the LCP?

14:20:49 I think this general template is workable. My suggestion is to add a question along the lines of: “In light of the absence of all [California School Dashboard (Dashboard)] data for the 2019-2020 school year, what data was used to approximate progress in ELA and math achievement” This would allow LEAs to describe their internal data that aren’t public.

14:20:49 The distance learning piece is new and this makes sense to do an analysis but not two analysis - unless the perspective is a short analysis for what's happened since we opened end of October and first week of November. Seems we won't have much to say here. Just getting started

14:21:20 Many [LEAs] were working on our 2019-20 LCAPs when school closures occurred and were working on Annual Updates. It would have made sense to submit those earlier this summer than what is currently being communicated.

14:21:25 Suggestion: Can the analysis questions only be required for the LCP?

14:21:25 This is not purposeful.

14:21:54 Will LEAs be allowed to include [not applicable (N/A)] for those metrics that are aligned to items that were suspended due to the Executive Orders and later [Senate Bill (SB)] 98?

14:22:27 Just want to echo the incredible overload LEAs are facing and the need to minimize compliance burden - any compliance requirements should be as meaningful and least burdensome as possible

14:22:32 I believe the LCA plan specified [English Language Arts (ELA)], [English Language Development (ELD)], and Math (but not science). Is there a reason these are left off the [Learning Continuity Plan] update?

14:22:34 It almost feels like the Learning Continuity Plan update is really what will inform our LCAP for next year. It is unfortunate that we have to do a mid-point response with analysis and not save this until we do our LCAP for next year.

14:22:37 The 19/20 AU should be a brief overview only; we are in a pandemic, and it makes no common sense to go back to something that was written almost two years ago.

14:22:38 Does statute require [local governing] Board approval for this annual update?

14:22:53 2019-20 LCAP Annual Update will have incomplete data and difficult to make relevant to our stakeholders.

14:23:02 School districts are currently not only implementing distance learning, but are now pivoting to allow for in-person instruction. There are a tremendous set of factors needing to be addressed which will continue into next semester. The largest concern we have is learning loss and how do we accurately reflect this learning loss when we are all in distance learning. It doesn't seem appropriate for us to write a 3-year LCAP based on learning loss that is being determined through distance learning...it seems we may be trying to hit a moving target that will continue to move until we are able to come back to full in-person instruction…We are in the middle of the pandemic and truly do not know when we will be returning.

14:23:04 Hasn't 2019-20 already been "updated" between the LCP and [the Budget Overview for Parents]? LCP covered learning. [the Budget Overview for Parents] covers funding and expenditures. Having to address them in the AU seems redundant.

14:23:10 Usually Annual Update includes do estimated actuals before the year is over. Considering 2019-20 is over, do you me actual expenditures?

14:23:12 It would make more sense to have the LCP be the LCAP for this year since it has such specific goals already detailed for the schools. If we had been able to submit the LCAPs as they were, then it would make sense to have to comment on them. But since we did not submit them, the only thing that would not totally overwhelm an already overwhelmed system is to report on everything done up to March... Everything after that connects to the LCP that would be inclusive of 2020-2021.

14:23:38 Suggested language about outcomes not measured due to COVID will be helpful

14:23:42 I am more than willing to host any of you facilitating this process, on site in a district and at a school site to get a real feel for what we are doing to manage safety, decreased funding, and address student need, engagement and instruction. This would be a great opportunity to get insight and proactive conversations regarding these issues.

14:23:59 What happens with LCAP required metrics that were not collected in 2019-2020?

14:24:20 Also we need clarity on providing the public with annual update for 2019-2020 and board approval. Very confusing to explain to our board and community

14:24:29 Reporting such old data in the analysis and annual measurable outcomes will be confusing for stakeholders who may not fully understand how far back the data reaches.

14:24:46 Could you kindly include an estimated percentage of how much of this update is Programmatic vs Fiscal? This will help set norms and expectations for who is involved to complete this.

14:24:47 Please keep LCAP 19-20 and LCP 20-21 Update sections separate. Also, please loosen the Analysis narrative boxes so we can indicate what we accomplished and we didn’t get to finish. I don’t think the Budget Material Differences box would even be relevant.

14:24:47 I agree with previous comments about a detailed review of each of the actions within the 2019-20 LCAP. It would be really nice if CDE would consider removing the “Actual Actions/Services” from the 2019-20 portion and request a summary be in the analysis section. Note, a reflection of planned versus actual services is not even included in the LCP portion. LEAs were told to halt all work on the 2019-20 LCAP Annual Update because the template was changing but it does not appear any changes have been made. Please help our LEAs make this easier.

14:25:17 100% agree with: I don’t think the Budget Material Differences box would even be relevant.

14:25:23 I agree 100%: I don’t think the Budget Material Differences box would even be relevant.

14:25:29 I agree about the Material Difference comment

14:25:33 Many of us completed the annual update before the school closures. Is there a reason why we're not sticking to that template? I understand we'll need to report on "annual update" type document for Learning Continuity Plan.

14:25:35 In “Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard,” The reference to the Dashboard should be stricken since it will cause confusion

14:25:39 Ed Code requires districts include specific metrics in the LCAP that are tied to state priorities. LEAs will not have certain metrics due to SB 98 and COVID. This is more of an observation than anything else.

14:25:44 Agree with Material Difference comment

14:25:46 Also agreed re: material difference

14:26:00 agreed re material difference

14:26:02 agreed - material differences

14:26:05 Also agree with material difference comments

14:26:06 Also agree with: I don’t think the Budget Material Differences box would even be relevant.

14:26:20 Agree with the material differences comment

14:26:44 What is the purpose of the 19-20 AU since it will be 2 years later and so much has changed? I would suggest eliminating that and just including the 20-21 LCP AU. I think the COVID Operations Written Report should be taken as the AU for 19-20.

14:26:50 The template is very heavy narrative and it feels burdensome with all we are managing and doing. It would be great to see if it could be simplified and only do one analysis for LCAP Annual Update and only one Analysis of everything after the Learning Continuity Plan as a whole. The budget for each piece after each section makes sense but it is a lot of reading for our community stakeholders. I feel like they stakeholders in our small town need to know how is In-Person going; Distance Learning going what has been spent to date to get us up and running.... it is such a detailed template that it feels like it moves away from the purpose in communicating to our stakeholders. However, it could be simplified, reorganized so narrative is at the end of each piece seems like it meets the spirit and intent of the legislation. Less is more - and with less more is communicated with our families. I believe that is our purpose.

14:26:54 agree with the material differences comment

14:27:07 Also agree with the material differences comment

14:27:15 I agree with the comment that providing an update for 2019-20 to stakeholders 6-8 months from now is going to be confusing to them and lacks relevance. Can this be a completely separate document?

14:27:17 Many of us completed the annual update before the school closures. Is there a reason why we're not sticking to that template? I understand we'll need to report on "annual update" type document for Learning Continuity Plan.

14:27:33 How is this NOT going to confuse stakeholders? I think those of us in the LCAP writing process are confusing what the 19/20 LCAP represents so how can we keep this all straight for our people. Isn't the 19/20 LCAP what was written 18/19 then adopted by 7/1/2019?

14:27:39 I agree. Most of that was done when working on the 3-year LCAP.

14:27:41 This is a lot to ask of districts. We are struggling to keep the wheels on right now.

14:27:42 Given that the districts have already written an Operations report covering the adjustments for school closure and distance learning in March-June of 2020 would it be more appropriate and/or efficient or fair to create modified narrative questions on the 2019-20 LCAP annual update that require accountability for the period of start of school in August to school closure.

14:27:44 Estimated Actuals OR Actual Expenditures?

14:27:49 The only thing missing are some of the data points

14:27:49 Which data shall we use for the Actual Outcomes for the 2019-2020 update?

14:27:51 During Covid-19 parents are the teachers. and this may last till 2021. Many districts are engaging parents at each school; however, some districts are not engaging parents nor the community. We are in different times, never lived before by this generation, and we need to have different approaches to engage parents.

14:27:56 This template is asking for the same information we just reported in the LCP.

14:28:00 In some LCPs I have looked at, it does not appear the actions have accurately reflected the plan. Perhaps an analysis requiring LEAs to compare what they planned to do with [what] they actually did would be good. There is a prompt to describe the substantive differences, perhaps the analysis would start with, how did you do with your plan? What changed between what you planned and what you actually did, then what were your challenges and successes, then what was the budget versus actual differences. Then, how is the experiences from this year informing your 2021-22 LCAP.

14:28:02 Yes, if the update was completed and shared with stakeholders before closures, can we have the option to use that template?

14:28:06 I just think it’s important to streamline the template as much as possible while still meeting requirements so districts and charters can focus on distance learning and eventual return to in-person learning.

14:28:11 Please be considerate of the immense demand being placed on districts (especially small ones) during this challenging time when we are needing to pivot between instructional models for students as schools open and close.

14:28:20 agree with this earlier comment: Districts and staff are reeling with keeping up. I see two things: 1. annual update to learning continuity plan. 2. draft template for 21/22 LCAP. the LCP will handle current year. spending all that time to fill out a form disconnected to where we are is, in my opinion, a waste of tax payer resources in manpower. I do understand our accountability to the LCP in current year, and planning for next year

14:28:26 Data: "Using state and/or local data and feedback from stakeholders”

14:28:30 Going back to provide an annual update for 19/20 at this point seems counterproductive. It seems that it would be a much better use of our time and planning to focus on an update to the LCP and developing the new 3-year LCAP

14:28:34 I hope that you can advocate on behalf of districts considering our situations. understand the need to summarize supplemental intent and expenditures, but need to focus on finishing this year and moving on. we will spend way too much time on this current template just to meet a compliance issue which is not very disconnected to current situation.

14:28:37 I agree that an annual update from the 18-19 LCAP is completely irrelevant at this point.

14:29:05 For metrics and data sources, we would need some very specific lists for areas based on the upheaval of COVID and the lack of evidence to improvements and growth.

14:29:09 Yes small districts have one person working on everything [English Language Proficiency Assessments for California], LCP, [School Plan for Student Achievement (SPSA)] etc. plus, models for returning and [distance learning] implementation

14:29:11 Agree - we have much to consider as we are knee-deep in the pandemic...with no end in sight -

14:29:29 AGREED! This workload is massive for all sizes of districts but in a small school district it is likely that one or two individuals are the writers of all of these plans.

14:29:29 Exactly. For example, charters and smaller districts have to do all of this work on their own. All of these changing rules and regulations are adding EXTRA work on school leaders who really should be focusing their time on planning for kids, not trying to remember what happened in FY20. That feels like a million years ago at this point.

14:29:30 With budget development taking place in February/March, funding uncertified, and a template not ready until end of January, We are effectively being asked to complete what now appears to be a 100% compliance document in 30-60 days (remotely). Please consider the original goal of making this a useful planning document and getting away from the compliance / Gotcha mindset.

14:29:32 Agreed. The focus on moving back and forth between distance and in-person learning has consumed the time of limited staff in smaller districts.

14:29:46 Material Differences is still relevant. Of course, there will mostly be "due to pandemic". To reduce repetitive statements that might dissuade a reader, could the prompt instead be "Indicate material differences other than those created by the pandemic"

14:30:06 Please remember that the majority of LEAs in CA are small/single schools and these lengthy documents and requirements are very burdensome for those, the majority, of LEAs. Any flexibility in reporting requirements would be very appreciated by all.

14:30:28 The Y and N idea was horrible. So confusing and difficult to explain to stakeholders

14:30:31 Please remember that the majority of LEAs in CA are small/single schools and these lengthy documents and requirements are very burdensome for those, the majority, of LEAs. Any flexibility in reporting requirements would be very appreciated by all.

14:30:35 I agree can we simplify the 2019-20 update and note what we were able to provide prior to school COVID closure. Analysis is not as important due to the magnitude of the learning loss as a result of COVID. Need to focus on reentry to on-site learning and mitigation of learning loss in 20-21. LCAP priorities pre-COVID is much different than post COVID.

14:30:48 If our accountability for 19-20 data is suspended and a Dashboard will not be reported, then 19-20 data is irrelevant and most areas will be blank due to lack of data. If we are expected to use data from Dataquest, then we are measuring apples and oranges. That is way too confusing for most district employees, let alone stakeholders.

14:31:11 for the LCP Annual Update, if you want clarity for parents the tables should remain separately. That way, they can follow the LCP into the AU.

14:31:31 I agree…that the books will only close when everything is due to the state, but there could still be purchases that are made for some of the services through the summer. We are having to augment summer school (and add in a winter school!) to help students with learning loss!

14:31:50 There is a lot of chaos in education right now. We can't even get students back in class at this time, let alone focus on reporting results. A simple method to meet requirements would be appreciated.

14:32:05 It’s almost like a copy and paste from one doc into the other.

14:32:44 Suggestion: LCAP 2019-20 AU should only have the overall implementation question— the other 3 questions are not relevant.

14:32:52 Holding districts accountable for "actual" expenditures in 19-20 based on "budgeted” expenditures in the 19-20 LCAP does not seem like a valid or appropriate accountability measure

14:33:27 Feedback on the template and instructions may be emailed to LCFF@cde.ca.gov throughout the revision process.

14:33:42 I think it would help if the four different analysis sections of the 2020-21 LCP were combined into one overall analysis section. Likewise, one overall table for all expenditures. I also agree that 2019-20 annual update seems irrelevant now that we will be focusing on the 2021-24 LCAP and the 2020-21 LCP update.

14:35:19 Is there a place in the template to identify the impact that state deferrals have on the LCAP and LEA programs?

14:35:25 Agreed. Please consider the small size of many districts when it comes to meeting any potentially unnecessary requirements.

14:35:59 The annual update of the LCP looks a lot like the LCP template

14:36:12 Good question [Is there a place in the template to identify the impact that state deferrals have on the LCAP and LEA programs?]!

14:36:40 so the 2019-20 annual update will include actuals expenditures and the 2020-2021 Learning Plan update will include estimated actual expenditures, correct?

14:37:00 We completed the Annual Update prior to shelter in place based on estimated actuals at the time. Does this need to be redone with updated actuals?

14:37:22 Deferrals impact would be a nice inclusion since the cost of loans to cover cash flow impact the amounts available to support programs.

14:37:32 With all the uncertainty with COVID and distance learning, this feels cumbersome to fill out.

14:37:43 Anything you can do to simplify the budget reporting especially the estimated expenditures and actuals would be greatly appreciated.

14:39:10 Please find a way to simplify the required accountability so we can focus on students and learning. We need to spend time working with our stakeholders to bring our schools out of COVID’s impact.

14:40:15 Legislative requirements are understandable. However, balancing the reporting tools with their usefulness will support a focus on implementing a purposeful plan rather than completing a requirement.

14:41:19 Is it possible for the directions to include a description of how the "Contributing" column is connected to the amount reported in the [Budget Overview for Parents]?

14:42:38 It will be challenging to match up 19-20 goals to measurable outcomes. Will there be additional guidance on how to evaluate measurable outcomes immediately post-COVID?

14:43:23 It is an exercise in futility to evaluate 19-20 given the circumstances and lack of valid data, or in some cases, no data at all. Any data from 19-20 has big asterisk \* next to it. Really, what meaning does it have? Moving forward, districts should reflect on their experiences in 20-21 and how they addressed critical elements of the LCP like instruction, equity, access, mental health, and learning loss.

14:44:12 Echo comments to focus on assessing learning loss and making meaningful plans to address it - anything [that can be done] to focus precious time on planning that is most urgent

14:45:53 With "hold harmless" there is no local outcome data

14:46:20 the Operations Written Report and the Learning Continuity & Attendance Plan were WELL received by school districts throughout the State. We felt these were documents focused not only the current, but also for the near future (the following school year). A streamlined approach during the pandemic would be most appreciative.

14:46:30 SPSA for Single School Districts, Budget Overview for Parents, 19-20 Annual Update, 20-21 LCP Annual Update, 21-24 LCAP. Whew! Seems like an awful lot. More isn’t always better, sometimes it’s just more.

14:46:43 It feels like we got a brief reprieve in the Governor's Executive Order but it's all coming back around even though we are still juggling a lot.

14:46:50 Annual Measurable Outcomes: not collected on state nor local level, particularly after closures. We don't have any alternative data for the 20-some-odd metrics needed.

14:46:52 If the requirement has to stand, please adapt it so it’s manageable in this very difficult time.

14:46:58 Partial year data collection would actually make significantly more work for us.

14:46:59 This is all so much to ask of districts and COEs. I appreciate the support and time to provide feedback and all I can say is it is very burdensome to do the 19-20 annual update at this time…

14:47:02 Your statement sums it up accurately! Thanks.

14:47:03 I second that above comment. It's especially tough on smaller districts where many of us are in multiple roles (trying to reopen a school on top of all the documentation being thrown our way).

14:47:06 Reporting data through February 2020 for the partial year seems even more absurd. Sorry. What would the point be?

14:47:07 You need to keep in mind that you are asking for 1.5-year-old data (by June) and many [Student Information Systems] don’t allow that to be captured this far out… in terms of attendance

14:47:17 MY understanding is that at the state level the attendance data is not clear whether it is through Feb or June, it would depend on local data and analysis to report that way.

14:47:19 Local metrics will not be strong predictors of student performance given the current conditions for students.

14:47:21 The data available may be highly skewed since the majority of schools in California are currently in distance learning.

14:47:22 Using local partial year data will require a lot of local data aggregation as there isn't update data on Dataquest and/or the Dashboard.

14:47:36 Thank you for the opportunity for feedback on this. I would ask that you please consider what the school staff and administrators are currently going through aside from all of the documentation pieces. Many districts and LEAs have been closed since March, staff and teachers working from home, unprecedented wildfires that forced our students, staff, teachers, community to evacuate and be displaced for weeks. Schools admin trying to minimize learning loss through virtual means, monitor engagement over Zoom and come up with multiple plans to re-open schools during a global pandemic. While we understand the accountability factors of the LCAP and LCP, it's still a lot to go through. Any streamlined documents and/or deadline flexibility are most appreciated. Thank you for advocating for the LEAs.

14:47:49 Agree... sharing LEA / charter perspective would be helpful. Adapting requirements so they are purposeful and useful seems to be the spirit of the law

14:47:54 I think there’s going to be a lot of [reporting “not applicable”] for actual [Annual Measurable Outcomes], but that’s okay with me if it’s okay with [the California Department of Education].

14:48:40 I don't think that this many disjointed documents will be clear for parents at all. It will seem overwhelming to them as well, especially reporting out 19-20 data that was cut short.

14:48:41 Can the instructions specify the extent to which LEAs can use [“not applicable”] as a response? For example, many of the actual outcomes may never have been able to be measured, and could be [“not applicable”] for that reason.

14:50:47 Will "[not applicable] in absence of 2020 Dashboard data/Dataquest data" be an acceptable outcome?

14:51:46 Thank you for soliciting feedback from the field and encouraging articulation of concerns via chat.

14:51:46 We can calculate all of the required metrics in statute with reasonable accuracy to what is normally reported on the Dashboard or Dataquest except State Assessments and [Early Assessment Program]. Does there need to be legislation or are we fine just stating that they weren't available?

14:52:30 Thanks…for giving us this early look at the template. Knowing it may change, this is still helpful to start the planning process and bringing together our teams to the work.

14:52:59 any changes that acknowledge a global pandemic and the impossibility of predicting outcomes would be great.

14:52:59 I appreciate the heads up and the opportunity to comment.

14:53:05 Thanks for sharing the draft. It is very helpful to see how the legal requirements might play out in the document and what LEAs need to be thinking about now. Appreciate the opportunity to have something to look at and respond to.

14:53:37 could feedback provided to the email address be shared publicly?

14:53:38 Thanks for the update…and the opportunity to provide feedback.

14:53:39 Will there be another opportunity to provide feedback on v2? Or is that going to be the final?

14:53:56 we appreciate all of your work and support on this. I question the statement that the AU "is not an auditing or accounting document." I'd like confirmation from the [Federal Program Monitoring] department.

14:53:58 [The Education] code shared does not say an analysis is required just budget updates.

14:54:25 Thank you for all of the information. Looking forward to the revised document.

14:54:26 Thanks…not trying to shoot the messenger as it were but I think we are all worn out and weary from compliance documentation when our time needs to be spent supporting our staff who is extremely stressed out.

14:54:37 Thank you for the opportunity to provide input

14:54:55 Please don't limit text boxes. The responses may require significant information to be clear to stakeholders.

14:54:57 Thank you for the review and opportunity for feedback.

14:55:04 ED code shared does not say an analysis is required just budget updates.

14:55:07 Thank you. We do appreciate your willingness to take our feedback into account.

14:55:19 Thank you. Really appreciate all of the information and taking time to explain

14:55:56 Thanks for being so positive during our "stressed out" comments in the Chat.

14:55:56 Thanks. We appreciate you and all you do for us. We promise no harm will befall the messenger…lol. A big thank you to all of you working on your end to bring information to us.

14:55:57 I am still unclear of this ed code, and what you all say is being required. very nebulous

14:56:21 Can you please explain Additional Actions and Plans requirements? Shouldn't all of the actions have been included prior to this section. What would be an example of additional actions?

14:56:35 Thanks, not trying to shoot the messenger as it were but I think we are all worn out and weary from compliance documentation when our time needs to be spent supporting our staff who is extremely stressed out.

14:57:00 I am sorry but I see in the ED code shared the finance portions required not an analysis of the 2019-20 LCAP or 2020-21 LCP. Is the CDE making their own requirements?  
“the school district, county office of education, or charter school shall include the actions and expenditures included in the learning continuity and attendance plan adopted pursuant to Section 43509 of the Education Code and the local control and accountability plan adopted for the 2019–20 school year.”

14:57:04 Thank you for hearing our voices.

14:57:06 I am sorry but I see in the ED code share the finance portions required not an analysis of the 2019-20 LCAP or 2020-21 LCP:  
“the school district, county office of education, or charter school shall include the actions and expenditures included in the learning continuity and attendance plan adopted pursuant to Section 43509 of the Education Code and the local control and accountability plan adopted for the 2019–20 school year.”

14:57:11 Please provide your feedback to on the 2021–22 Annual Update Template and Instructions to LCFF@cde.ca.gov

14:57:17 Thank you making time to explain the thought behind the development/design of the template and the opportunity to provide feedback. I appreciate the you have “lived” the document and could address the questions from attendees.

14:57:43 Yes!

14:57:46 Exactly

14:57:50 [Education code has] no mention of analysis

14:58:24 Thank you for the opportunity to preview and provide feedback, it's much appreciated.

14:59:04 Please clarify under Pupil Learning Loss: "substantive differences", is this correlated to a set amount of funds exceeded that makes it substantive?

14:59:16 Thank you for the opportunity to provide feedback. Take care….

14:59:19 Thank you for walking us through this!

14:59:24 Thanks. Looking forward to the finished product.

15:00:12 thank you for allowing us to provide feedback.

15:00:16 Thank you. I hope we can move forward with a perspective appropriate to conditions we face in a global pandemic.

Webinar ended at 15:01:00

## Attachment 5: Stakeholder Feedback from LCFF Inbox

In addition to providing feedback during scheduled stakeholder engagement sessions, stakeholders were encouraged to submit feedback to the [**LCFF@cde.ca.gov**](mailto:LCFF@cde.ca.gov) email inbox. The following feedback was submitted via email between October 27-November 9, 2020.

Note: names, contact information, comments and questions that are not germane to the 2021-22 LCAP Annual Update, Version 1, have been redacted.

### October 27, 2020

19-20 Annual Update (AU) Local Control and Accountability Plan (LCAP) Section

* Eliminate questions 2 and 4 in each of the Analysis sections.

20-21 Learning Continuity and Attendance Plan (LCP)+ Section

* Eliminate question 4 and combine questions 2 and 3 for each of these sections

Not all of these questions are needed and some are redundant. Please consider lightening our load.

Good afternoon. As was mentioned in today's webinar, there will be several Expected Annual Measurable Outcomes (EAMOs) that do not have an actual outcome due to the suspension of California Assessment of Student Performance and Progress (CAASPP) and other testing.

Most districts (especially those that have Comprehensive Support and Improvement identified schools) have developed alternate measures to track progress on EAMOs.

I suggest adding a question along the lines of: "What local or other data was used to measure effectiveness due to some Dashboard data being unavailable?"

This could perhaps be added to the second Analysis question "Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the Local Educational Agency (LEA). What local or other data was used to measure effectiveness when Dashboard data was not available?"

Other than that, I believe the template is well organized. Many LEAs likely won't have much to say on "In-Person Instructional Offerings" since it's looking less and less likely some counties will be able to re-open.

Dear all,

Please…ensure that there is a section where districts analyze how funds were spend and the outcomes based on state or internal data.

Additionally, there is a need for the system to continue to bring the focus on the subgroups which the funds were intended for.

### October 28, 2020

After listening to yesterday's webinar (Tuesdays at 2) regarding the Annual Update and LCAP, I have a few suggestions:

1. Issue: The 2019-20 Annual Update refers to Goals with Actions and Services written almost two years ago.

Solution: Modify the Annual Update to be one paragraph for each goal. Each paragraph will be a narrative about implementation, effectiveness and estimated and actual expenditures. Due by June, 2021.

2. Issue: The 2020 Learning Continuity Plan was written in response to a never-been-seen before pandemic. The spending is unlike anything districts have ever had.

Solution: Require the Annual Update for the LCP be due December 15, 2021, when the Actuals can actually be calculated and the effectiveness can be analyzed.

3. Issue: The three-year cycle for the LCAP will be very different.

Solution: Keep the June 30 due date.

Most districts in California are scrambling to keep up with the changes to delivery of instruction during the pandemic. We can still adhere to the statute without these burdensome tasks of Number 1 and 2 above.

To Whom It May Concern:

I attended yesterday's "Tuesdays at 2" webinar on the expected Annual Updates for the 19-20 LCAP and 20-21 LCP. The general tone of the chat in my opinion was a recognition of the need to report on the use of LCP funds to the public. However, there was much disagreement on the value of retroactively completing an Annual Update for 19-20.

I work in what I consider a small district, though it is not a "Small District." We serve three elementary schools, one middle school and one homeschool. The District Administration team involved in writing our typical LCAP consists of myself, the Superintendent, and our CBO. That's it. In a typical year, this is a stressful task, though we see the value in completing a plan that is informed by multiple stakeholder groups and tells a transparent story to our community.

Everyone knows that the 2019-20 Actions and Services were not completed as planned. Therefore, if the Annual Update is to be required, it should be structured to capture the minimum amount of information necessary. I could envision a list of the actions/services set out under each goal next to a few checkbox options: completed; not completed due to COVID; not completed due to other reasons. Then provide narrative space at the end of each Goal for an explanation of actions/services "Not Completed Due to Other Reasons." The only narrative Budget box should ask how Districts chose to use LCFF funds differently due to the pandemic. For instance, in our District, we reviewed our LCAP for any actions/services not completed, and re-allocated those funds to purchase Chromebooks for students.

Please think simple and minimal in redesigning the 19-20 Annual Update template. We are going to be trying to write a new three-year plan WHILE trying to re-open schools (which should be the main priority) and we just don't have the capacity to do all of it as well as we'd like. The Annual Update is a place where some "give" can be offered.

Thank you for reading and reaching out to collect our feedback.

Hello,

Asking Districts to complete an annual update for 19/20 and another annual update for the LCP and creating a new 3-year LCAP will be a burdensome and overwhelming task especially for small Districts. In my District, I write all of these as I don’t have a LCAP department or team. Our budget team will be completely overwhelmed as well as they do all of these things and close the books for 20-21 and create a new budget.

I do not understand how an annual update from 2019-20 will inform the development of our new 3-year LCAP or even be of interest to stakeholders and I think asking Districts to complete it feels like a punishment. Statue needs to be changed and your team needs to advocate for Districts instead of just complying with laws created by those that have no idea what Districts are doing daily to support students and families in these unprecedented times.

I do wish that staff from the California Department of Education (CDE) and legislators would come and see what Districts are dealing with on a daily basis right now to help inform your discussions at the state level and please don’t visit LA Unified. Go to smaller Districts to get a better picture of what is actually happening and what a huge burden this will become. My focus will have to turn to compliance and not on the needs of our students and families.

### October 30, 2020

Hello,

Please accept this input for the Annual Update:

Can some prompt responses in the AU for both the LCAP and LCP be combined? If not, can the analysis questions be consolidated a bit? For example, the first and last question could easily be combined and make a lot of sense to a reader and writer.

1. Does each action need to be addressed in the AU for the LCP?
2. Why would the “contributing” column be included in the AU for the LCP because it is not for the LCAP. Why inconsistent on that?

### November 3, 2020

Good afternoon,

In the area for the goals, there is a space to write the goal and the expected/actual outcome, however, there is no space to put the metric (that which was being measured nor the baseline).

Please let me know how I may be of further service to you.

Hello,

Thank you for the opportunity to provide feedback. As many districts have shared, this is an extremely difficult time and we respectfully request that modifications be made to reduce the burden on school districts. Additionally, the multiple documents, some that reference plans of nearly two years ago, are confusing to stakeholders.

For the 2019/20 Annual Update:

Ideally, the requirement to complete this update would be eliminated. The data is not current, many budgeted actions were not able to fully implemented, and the information is not meaningful. If that is not possible, please reduce the document to perhaps a brief narrative.

LCP Annual Update:

Please consider removing redundant sections.

Please remove the column entitled "contributing." This is very confusing and not meaningful.

Some sections may not be applicable, or have little information. For example, for districts that are unable to open in person programs until early spring, the section on in person learning would be minimal.

As opposed to the 19-20 LCAP, it does make sense to report out on progress towards our actions in the LCP this year, since this is the plan we are currently implementing.

Thank you for your consideration.

### November 5, 2020

Hello.

As you are requesting input regarding the annual update for 2019/20 I have many questions as to why. Spring of the 2019-2020 school year was like nothing we had ever experienced. I have been in education administration 22 years and the fact we would be asked to go back to complete a document that no longer matters seems like red tape. We have more important things to spend our time on. Distance learning, hybrid models, contact tracing, symptom checks, subbing when staff have symptoms, meals to our students, transportation restrictions, emotionally supporting our parents and students... the list could go on for days.

Honestly, we are all (teachers, classified staff, and admin) trying to stay afloat while providing the best possible education to our students. Where is our energy best spent at this point? Writing a plan that will have no meaning, or emotionally supporting our staff, students and families? In rural districts we do not have support staff to write these plans, it all falls on one person and we too are spread thin. If data is not available, we will simply write "no data due to COVID" which has no meaning. I can hardly remember what I did last week, let alone nine months ago and then review data from as far back as a year from that. There seems to be a huge disconnect between the needs of those in the field and those at the State level.

I speak on behalf of rural districts when I say, we are at our max. We are exhausted, in need of normalcy like everyone else, and do not need busy work. We need to focus on the current situation and our environments as we begin to deal with more cases leading to closures and possible Shelter-In-Place at some point this Winter.

To: Local Agency Systems Support Office at CDE

On Wednesday members of [our] LCAP Professional Learning Network convened to participate in a collaborative discussion regarding the Draft Annual Update Template for the 2019-20 LCAP and 2020-21Learning Continuity and Attendance Plan. Below is a summary of the priority points from the group’s feedback, followed by the raw notes and comments submitted by participants from LEAs.

Summary:

Two universal thoughts from our group regarding the Draft Template are that the template is too long, which in turn will lead to an excess of time being spent in completing the document, and second, the Draft Template is not considered to be of much value as a decision-making instrument.

More on this second point, an analysis of the 2019-20 LCAP is not seen as a valuable use of time in that the 2019-20 school year is too far in the past and many of the Annual Measurable Outcomes are not useable because there is no data available from the 2019-20 school year due to school closures. In continuing with the theme of plan analysis, it is generally believed that districts will not be able to complete an analysis of In-Person Instruction or Pupil Learning Loss effectively. Most of the districts in this county are just now getting students back on campus and even at that, it is not their entire student population. To this point, districts do not anticipate having enough valid data available to them to be able to analyze these aspects of their educational programs in a meaningful way. And certainly not in a manner which will lead to meaningful decision making. Local timelines for plan development and approval do not allow for meaningful implementation of instructional and support programs. This will result in an insufficient amount of data available for analysis.

Finally, those that lead the LCAP work for their districts…are dedicated to developing LCAPs that have value and provide meaningful content for their stakeholders. As a group, these educators do not approach their LCAPs as a compliance document, rather a valuable communication tool. In its current form, this Annual Update is viewed as a compliance document and not one they are ready to dedicate their valuable time to completing. In the notes below, participants have shared several suggestions for improvement to the Draft Template.

Meeting Notes:

● Be helpful: in the instructions, to give us a blank statement (i.e. - Due to Covid-19, no state assessments were administered).

● Annual measurable outcomes with no [state testing], then what?

**●** Give us COVID boiler plate response that can be used when data is not available

● The intent of the annual update is to drive the actions for 2020-21? This template will not drive the development of these actions.

● I don’t see the relevancy of this report on what has occurred.

● They feel this is an exercise in compliance.

**●** Certain tests were not administered…so we have not data for analysis

● There is a variety of data that is looked at in the LCAP: suspension rates, attendance, state testing, health kids survey etc. – many of these data points are not available from 19-20

● First semester of 2019-20 looked completely different than the second semester in terms of assessments, implementation of strategies and expenditures. Incomplete data available.

● Is it possible to eliminate the last question or is there a simple statement that can be used to respond to this question? We do not have the data necessary for analysis and decision making.

● If the goal is to check a box, then we have the form and timeline. If the goal is to make this template useful and meaningful, then we need to streamline the questions and provide more time to process, analyze, discuss and report. Suggest moving analysis of the LCP to June or July.

● The instructions tend to be heftier. Analysis is our own best processing of what was done. It is important to go off the directions vs. only the prompt to make sure everything is addressed.

● The second description was changed - Is there a reason for that? What should be provided in that response? What is the definition of "substantive"? This needs a better description in the Instructions.

● Can we do the annual update for the LCP and have it due in September or October? Can the timeline be reconsidered to be able to pull "actual" data?

**●** Does this require stakeholder input?

● Whether it was in person or distance learning the overall goals were the same?

● Can there be an overall analysis at the end of the plan rather than one for each component (In-Person Learning, Distance Learning, Learning Loss)

● How do I distinguish the difference between some students that are at home and some that are in person?

● There is a lot of analysis with not a lot of metrics nor a good baseline. Many are worried about the metrics.

● This is so complex. Who is this report for?

● Can we use July and August to reflect?

● Rethink analysis of what we are actually able to analyze in January or February - incomplete data, lack of data, incorrect data.

● Need to condense and combine to reduce the amount of work.

**●** The Dashboard will not be available.

● Blurred lines between distance learning and in person learning.

● Authenticity of the assessment - can’t control the virtual aspect.

● This report becomes background and information for your stakeholders.

● Give us a process and timeline that is a benefit for us. It is too squished together.

**●** At this time, no participants in this meeting have had students for even a month.

● Suggest combining components of the LCP; a single response to instruction combining In- Person and Distance as well as learning loss; and an "overall" analysis of the LCP.

Dear LCFF/CDE Office,

I am writing to let you know that I have attended the meetings regarding the 19-20 Annual Update and I have some feedback. I understand the necessity of having a 19-20 Annual Update but the length and details asked of the current version is too overwhelming. I appreciate how the LCFF office has listened to all stakeholders throughout this process and I certainly hope that you will convey the message to greatly abbreviate what is being asked in the Annual Update for 19-20.

Thank you,

Greetings CDE Team,

I am writing with some feedback on the LCAP and LCP Annual Updates.

After reviewing the draft template, I have the following concerns:

* It will be challenging to report out on many LCAP metrics. Some metrics will not be available (ex: CAASPP scores) and others will not be accurate due to the shortened school year (ex: suspension rates).
* Having a double Annual Update will increase the length of an already very lengthy document.
* There is potential for big differences between budgeted expenditures and actual expenditures due to school closures.

I understand the need for accountability for the 2019-20 LCAP. A suggestion for accountability would be for districts to provide a broad reflection vs. a detailed summary of metrics and actions/strategies. My program, and I would imagine every other district, is more focused on looking forward and implementing the LCP than reverting back to LCAP metrics and action/strategies that are not valid and cannot be implemented due to COVID restrictions.

### November 6, 2020

Hello,

I'm writing to provide feedback on the Annual Update template. Before that, I want to thank you for the work you do for the kids in our state, and for Tuesday @ 2 webinars that are very informative.

I reviewed Senate Bill (SB) 820 for the legal requirements for the annual update, and read the Draft Annual Updates for 2019-20 LCAP, and 2020-21 LCP. Although I agree with the underlying goal of the proposed annual update templates, there are simpler more effective solutions that can be implemented to get meaningful information in a less onerous method. Below are my talking points.

* Quoting Governor Newsom's veto message for Assembly Bill 1835, this process "would also impose new and unnecessary procedural requirements on schools that are and will be managing unprecedented challenges related to COVID-19."
* With no CAASPP and Dashboard data this year, the information provided would likely be meaningless.
* The proposed template seemingly appeases advocacy groups, but does nothing to provide real meaningful information for our parents and other stakeholders.

As an alternative, allow districts to choose between completing the annual update approved by the SBE, or provide brief narratives that correlate with the Budget Overview for Parents.

Thank you for the opportunity to provide feedback.

I just wanted to send in some thoughts and concerns that I see as I provide support for administrators. I work with many small and single-school school districts and so many of our administrators right now are stressed and stretched to what I am afraid of might be a breaking point soon. They are dealing with COVID-19 contact tracing and investigating positive cases. They are dealing with staff shortages due to teachers and other staff being out. Many times they end up taking the employee's place because they cannot find a substitute. The conversations that I am having with districts is one of survival and compliance and I am concerned that a LCAP template that is asking more of them than even the previous LCAP asked (assuming that the LCP accountability will be a piece of the Annual Update) will be the final straw. I understand the pressure from advocacy groups and I get that that is a reality that we need to address but if context truly matters then we need to give our districts a template that factors in exactly what they are dealing with right now.

### November 9, 2020

Although we understand the need for transparency and an update to our stakeholders on the activities planned for 2019-2020, it is our recommendation that the Annual Update template be revised to remove the following sections:

* Actual Annual Measurable Outcomes
* The last box of the Analysis section, which asks for an analysis of 2019-2020 CA Dashboard Data.

Due to the impact of school closures on the planned actions of the 2019-2020 school year, and on our district's community, it would be extremely difficult to provide our stakeholders with meaningful data regarding Annual Measurable Outcomes and an analysis of the information that would typically be reported to the CA Dashboard.

## Attachment 6: Letter from the LCFF Education Equity Coalition

On November 6, 2020, the [**LCFF@cde.ca.gov**](mailto:LCFF@cde.ca.gov) email inbox received a copy of the following letter from the Local Control Funding Formula (LCFF) Equity Coalition. Note: the letter has been reformatted to meet accessibility requirements; however, the full text of the letter has been provided below.

November 6, 2020

Tony Thurmond, State Superintendent of Public Instruction

Brooks Allen, Executive Director California Department of Education State Board of Education

1430 N Street 1430 N Street Sacramento, CA 95814 Sacramento, CA 95814

Via email: [TThurmond@cde.ca.gov](mailto:TThurmond@cde.ca.gov) Via email: [BrAllen@cde.ca.gov](mailto:BrAllen@cde.ca.gov)

LCFF Equity Coalition’s Comments Re:

* Revisions to the Annual Update Template and Instructions for the 2019-20 Local Control and Accountability Plan (LCAP) and 2020-21 Learning Continuity and Attendance Plan Pursuant to Senate Bill (SB) 820
* Implementing Changes to the LCAP Template and Instructions Required by SB 98 in the 2021-24 LCAP

Dear Superintendent Thurmond and Mr. Allen:

We submit these comments on behalf of the Local Control Funding Formula (LCFF) Equity Coalition which is composed of civil rights, advocacy, community, parent, and student organizations that have worked diligently on passage and implementation of LCFF and its accompanying accountability system. LCFF creates an historic opportunity to focus resources on helping California’s neediest students overcome the barriers they face in closing opportunity gaps and graduating college and career ready. It also promises a new level of transparency and local engagement for parents, students, and community members in the design of their local schools. We are committed to strengthening California’s K-12 school funding and accountability system to realize its promise of creating a more equitable school system.

Section 57 of the August education budget trailer bill, Senate Bill (SB) 820, requires the Superintendent of Public Instruction, in consultation with the Executive Director of the State Board of Education (SBE), to revise the Annual Update template for the 2021–22 Local Control and Accountability Plan (LCAP) before January 31, 2021 to include both the 2020-21 Learning Continuity and Attendance Plan (LCP) and the 2019–20 LCAP.

We have appreciated the opportunity to discuss the proposed revisions to the template and instructions with California Department of Education (CDE) during stakeholder input sessions and want to recognize the efforts CDE is making to solicit feedback from members of the equity advocacy community and LCAP stakeholders.

Please consider our comments in response to the Annual Update template and instructions draft versions reviewed with members of the Equity Coalition on October 22, 2020.

Additionally, Section 57 of the June education budget trailer bill, SB 98, specifies changes to the LCAP template and instructions to be adopted on or before January 31, 2022. We encourage you to adopt the changes required by SB 98 in early 2021, in conjunction with the revisions to the Annual Update, so that local education agencies (LEAs) know what is expected of them and can incorporate the requirements as they begin preparing their LCAPs for the new 3-year cycle (2021-2024) and community stakeholders may participate in a more informed way in the development of their local LCAPs. We thank you for the opportunity to comment and look forward to continued collaboration.

I. Annual Update for the 2019-20 Local Control and Accountability Plan (LCAP)

a. Annual Measurable Outcomes

We recommend adding to the instructions that LEAs should discuss actual outcomes pre- and post-March 2020 to account for changes in outcomes as a result of COVID-19 closures and distance learning. Additionally, where state metrics are not available to measure outcomes, LEAs should include results of local benchmarks and data. SB 98’s mandate to assess learning loss requires the use of some data, and that data should be required in the update.

b. Actions / Services

i. Actual Expenditures instead of Estimates

“Estimated Actual Expenditures” in the fourth column should be changed in the template and instructions to “Actual Expenditures” as actuals have been published by LEAs. All other references to “estimated actual expenditures” for the 2019-20 LCAP in the template and instructions should be similarly changed to “actual expenditures.”

ii. New or Changed Actions / Services in Response to COVID-19

We suggest adding an additional sentence after the prompt to “[d]uplicate the Actions/Services from the 2019- 20 LCAP and complete a copy of the following table for each” inviting LEAs to add any actions not included in their 2019-20 LCAPs that they implemented in response to the pandemic in the 2019-20 school year. This is particularly important if these actions were not included in the LCP.

iii. Actions / Services Table Should Identify Funding Source for Expenditures

A column for funding source(s) should be added to the actions/services and expenditures table. LEAs received billions of dollars in CARES and Learning Loss Mitigation Funds (LLMF) to be expended in the 2019-20 and 2020-21 school years and stakeholders deserve to know how these funds were spent. We suggest adding to the instructions that LEAs should include the funding source for each action. At a minimum, LEAs should specify whether funds were from LCFF (and specifically indicate whether supplemental and concentration funds were used), CARES, ESSER or LLMF (disaggregated by type), or other federal title funds. This will help to overcome the lack of transparency in the revised Budget Overview for Parents.

c. Analysis

i. Describe the overall implementation of the actions/services to achieve the articulated goal

We recommend editing this prompt in the template to ask LEAs to discuss pre-COVID successes and challenges in implementation and post-COVID successes and challenges. It is important for stakeholders to hear about and for LEAs to reflect on both aspects because districts will need to address pre-existing challenges to implementation and understand how implementation changed because of COVID-19 as they begin returning to in-person instruction and prepare their 2021-2024 LCAPs. In place of “[d]escribe the overall implementation of the actions/services to achieve the articulated goal,” we suggest the following prompts:

* "Describe the overall implementation of the actions/services to achieve the articulated goal before schools shut down in March 2020. Include a discussion of relevant challenges and successes experienced in the implementation process."
* "Describe how implementation of the actions/services changed after schools shut down in March 2020. Include a discussion of relevant challenges and successes in moving actions and services to the distance learning model."

ii. Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA

To this prompt, we recommend adding the following language in the instructions:

* "Include a discussion of which goals were met, including for which student subgroups, and which actions/services contributed towards progress on those goals. Include a discussion of which goals were not met and which actions/services did not contribute to progress that should be evaluated further before continuing investment."

iii. New Proposed Prompt: Describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA

To prompt more equity-focused reflection as LEAs prepare for the next LCAP, we recommend adding the following prompt to the template:

* "Reflect on the identified needs from the Plan Summary that relate to the metrics tracked for this goal and describe the overall effectiveness of the actions/services to achieve the articulated goal as measured by the LEA for those particular sub-groups."

We suggest adding to the Analysis section of the instructions the following corresponding bullet:

* "Include a discussion of any disparity in outcomes between all students and student subgroups with identified needs, including whether the disparity is increasing or decreasing over time. Evaluate which actions/services contributed towards progress on goals for student subgroups with identified needs and which did not that should be evaluated before continuing investment."

iv. Reflecting upon the progress of this goal and an analysis of the data provided in the California School Dashboard, describe the relationship of this goal and related metrics and actions with the development of new goals in the 2021–24 LCAP, as applicable.

We recommend changing this prompt to read:

* "Reflecting upon the progress of this goal and the progress (or lack thereof) for different student subgroups on this goal, and an analysis of the available data, describe how you will change the goals and related metrics and actions to most effectively close opportunity gaps in the 2021-24 LCAP."

In addition to these edits to the prompt, we suggest adding the following language to the instructions:

* "Include sufficient reflection so that any parent, student, or other stakeholder can understand why you are prioritizing the goals, actions, and services identified in the 2021-24 LCAP and how they will address opportunity gaps for historically marginalized student subgroups."

II. Annual Update for the 2020-21 Learning Continuity and Attendance Plan (LCP)

a. Actions Tables Should Identify Funding Source(s) for All Expenditures

As discussed above, we also strongly suggest adding a column for funding source(s) to every actions and expenditure table in the Annual Update to Learning Continuity and Attendance Plan (LCP) and including a corresponding bullet in the instructions indicating that LEAs must report the funding source for each action including a disaggregated accounting of all CARES funds.

b. Add a Prompt for Additional Actions in Every Section

In our review of LCPs, we have noticed that the narrative sections and the actions listed in the LCP often do not match up. For example, many things discussed in the narrative do not have associated actions listed. To improve clarity and transparency of actions provided, we recommend including another prompt or table and corresponding instructions requiring LEAs to report any actions or services they identified in the LCP narrative that did not get memorialized as actions in the LCP.

c. Require an Effectiveness Analysis for All Actions and Services

It is essential that LEAs reflect on the effectiveness of the actions and services implemented to provide in person instruction and distance learning, mitigate learning loss, monitor and support mental health and social and emotional well-being, implement pupil and family engagement and outreach, and provide school nutrition in the 2020-21 school year, not solely the success and challenges experienced, especially for the high need student groups named in SB 98. Simply because an action was challenging to implement, does not mean it was not ultimately effective in achieving the desired outcome. It is important for LEAs to conduct this analysis in preparation for the upcoming 3-year LCAP and for stakeholders to have sufficient information about effectiveness of services provided in 2020-21 to inform their engagement in developing the 2021-2024 LCAP. As such, we recommend adding a prompt to each analysis section that encourages LEAs to describe and reflect on the effectiveness of the actions and services implemented in each section of the LCP. This is even more important now that the revised LCAP has eliminated this section. We suggest the following language:

* “A description of the overall effectiveness of [insert appropriate heading e.g. providing continuity of instruction], with specific focus on the effectiveness of these actions for students with unique needs, including English learners, pupils with exceptional need served across the full continuum of placements, pupils in foster care, and pupils who are experiencing homelessness.”

d. Add an Increased and/or Improved Services (i.e. Contributing) Actions Table & Analysis Section

SB 98 did not change the spending regulations for LCFF supplemental and concentration funds. Section 43509(f)(3) affirms that LEAs must adhere to existing statutory and regulatory scheme:

The learning continuity and attendance plan shall include a description of how the school district, county office of education, or charter school is increasing or improving services in proportion to funds generated on the basis of the number and concentration of unduplicated pupils under the local control funding formula pursuant to Sections 2574, 2575, 42238.02, and 42238.03 in the 2020–21 fiscal year pursuant to the regulations adopted by the state board pursuant to Section 42238.07.

As such, there continues to be a justification requirement for effectiveness of actions. To that end, we urge you to add an actions table for Increased/Improved Services to the template. LEAs should be required to account for all supplemental and concentration funded expenditures, not just those included in their LCP. The instructions should inform LEAs that every action marked “yes” as contributing in the LCP, as well as any contributing action added to the LCP Annual Update, and any other supplemental or concentration funded expenditure should be included in the Increased/Improved Services table.

LEAs should be required to respond to the following prompts:

* For each action being provided to an entire school, or across the entire school district or county office of education (COE), an explanation of (1) how the needs of foster youth, English learners, and low-income students were considered first, and (2) how these actions are effective in meeting the goals for these students.
* A description of how services for foster youth, English learners, and low-income students are being increased or improved by the percentage required.
* If your contributing actions do not equal your increased apportionment, explain how you met your minimum proportionality percentage (the percentage by which services for unduplicated students must be increased or improved as compared to services provided to all students).

e. Description of Substantive Differences in Planned vs. Actual Actions

We recommend adding to this prompt in every section an explanation of why there were substantive differences in planned actions and actual implementation of the actions in addition to a description of what those differences were. It is important for stakeholders to understand what factors lead to the change. Without that information, this prompt does not provide sufficient transparency to stakeholders.

f. Analysis of the Distance Learning Program

i. Add the Statutory Requirements of Distance Learning to the Instructions

In their analysis of the implementation of distance learning, it is important that LEAs refer and respond to the requirements of distance learning laid out in Part 24.5 of SB 98. In doing so, LEAs must analyze implementation of distance learning for specific student subgroups named in SB 98, including providing integrated and designated English language development. As such, we recommend amending the introductory language in this section of the instructions as follows:

* “Using state and/or local data and feedback from stakeholders, analyze the implementation of distance learning in the 2020-21 school year, as applicable. LEAs should refer to Education Code Section 43503(b)(1)-(6), which provides the requirements of distance learning. A complete response includes analysis of distance learning for students with unique needs, including English learners, pupils with exceptional need served across the full continuum of placements, pupils in foster care, and pupils who are experiencing homelessness and describe the provision of integrated and designated English language development and details for the provision of live interaction by certificated employees and peers for purposes of instruction.”

ii. Break Out the Distance Learning Program Areas into their Own Subsections

The current draft asks LEAs to concurrently analyze six components of distance learning (1. Continuity of Instruction, 2. Access to Devices and Connectivity, 3. Pupil Participation and Progress, 4. Distance Learning Professional Development, 5. Staff Roles and Responsibilities, and 6. Supports for Pupils with Unique Needs) over four prompts. This will inevitably make it more challenging for stakeholders reviewing the Annual Update to find information on the issues they care about. Instead, we strongly recommend that each of the six distance learning components be separately addressed so that stakeholders can see a complete analysis of all four prompts in a given section, e.g. devices and connectivity, and not have to sift through multiple pages and paragraphs to find information on the same topic.

iii. Supports for Pupils with Unique Needs

We request the addition of a prompt to the Analysis of Distance Learning Program section on Supports for Pupils with Unique Needs asking LEAs to describe how planned actions for Supports for Pupils with Unique Needs differed from planned actions for all other students.

g. Pupil Learning Loss

i. Actions Related to the Pupil Learning Loss

Section 43509(f)(1)(C)(i) of the Education Code specifies that the LCP should describe how the LEA will assess pupils to measure learning status, particularly in the areas of English language arts, English language development, and math. Measurement of learning loss cannot reasonably be the same for all students, yet few LCPs clearly explained how LEAs were measuring learning loss for different student groups. It would help stakeholders to understand the effectiveness of the actions and strategies to mitigate pupil learning loss if they knew the baseline LEAs were using to assess learning loss. To that end, we suggest including in the Annual update instructions that, if it was not included in their LCP, LEAs must add to their actions descriptions of how they are determining learning loss for which subjects, grade level spans and student subgroups.

ii. Analysis of Pupil Learning Loss

Section 43509(f)(1)(C)(i)-(iii) of the Education Code lays out the requirements for addressing learning loss in the LCP, including reporting information for student subgroups. We recommend edits to the language of the first bullet point in this section of the instructions to better align with the language in Section 43509(f)(1)(C)(ii)-(iii):

* “Describe the successes and challenges experienced in addressing Pupil Learning Loss and accelerating learning progress for pupils, as needed, and how these strategies differed for pupils who are English learners, foster youth, special needs or homeless, in the 2020-21 school year, as applicable. Responses should discuss the effectiveness of services or supports provided and provide updates on measurement data collected.”

h. Analysis of Additional Actions and Plan Requirements

i. Make Mental Health and Social and Emotional Well-Being, Pupil and Family Engagement and Outreach, and School Nutrition Separate Sections

In our prior advocacy around the development of the LCP, we repeatedly urged that the actions/services and expenditures to address mental health and social and emotional well-being, pupil and family engagement and outreach, and school nutrition be distinctly reported in their own sections, not lumped together in a catch-all additional actions table. Unfortunately, our concerns about transparency were well-founded. In reviewing LCPs, we have found that specific actions to support mental health and social and emotional well-being, pupil and family engagement and outreach, and school nutrition (all components of distance learning required by SB 98) are often missing. It is also common for the narrative descriptions and the actions listed to not align. The combined additional actions table in the LCP proved confusing for LEAs to spell out their planned actions for and stakeholders to understand them.

We strongly encourage you to correct this misstep in the Annual Update template and instructions by creating separate reporting sections for actions implemented for mental health and social and emotional well-being, pupil and family engagement and outreach, and school nutrition and the corresponding analysis narrative prompts for those actions.

ii. Addition to A description of the Success and Challenges Prompt

We recommend adding the italicized language to the first prompt to help stakeholders understand how LEAs dealt with challenges experienced in providing these services: “A description of the successes and challenges experienced in monitoring and supporting Mental Health and Social and Emotional Well-Being, implementing Pupil and Family Engagement and Outreach, and providing School Nutrition in the 2020-21 school year, as applicable, and how they were addressed.”

III. SB 98 Statutory Changes to the 2021-2024 Local Control and Accountability Plan Template

Section 57 of SB 98, the June education budget trailer bill, made some additions to the LCAP template and instructions. These changes to the forms must be made and adopted by January 31, 2022. Given that the Annual Update template and instructions are currently undergoing revisions, we believe it makes the most sense to make the required revisions to the LCAP template and instructions now, rather than wait another year, so that LEAs and community stakeholders will be aware of all requirements as they begin developing their 2021-24 LCAPs.

We note that CDE offered a change in this direction to the Board in January in Item 2 discussing the revised LCAP template and instructions, and the Board agreed to change the language to “should.” While the specific language change shown on the slide shown by CDE staff Mr. Breshear’s is at the beginning of the Actions and Goals section of the Instructions, the instructions below it after the subheading Measuring and Reporting Results should reflect this change for consistency:

Measuring and Reporting Results:

For each LCAP year, identify the metric(s) that the LEA will use to track progress toward the expected outcomes. LEAs ~~are encouraged to~~ should identify metrics for specific student groups, as appropriate, including expected outcomes that would reflect narrowing of any existing performance gaps. See Board archived webcast, January 8, 2020, at 2:01.

The relevant changes in SB 98 to the LCAP are listed below.

a. Addition of Stakeholder Engagement Summary

Education Code Section 52064(b)(9) adds to the LCAP template: “A summary of the stakeholder engagement process and how stakeholder engagement influenced the development of the adopted local control and accountability plan and annual update to the local control and accountability plan.”

b. Goals Section

i. Goals Based on Performance of Pupil Group or Subgroup Meeting Criteria for TA

Section 52064(e)(5) adds to the LCAP instructions: “…the instructions developed by the state board pursuant to paragraph (1) of subdivision (d) shall specify that school districts, county offices of education, and charter schools that meet the criteria to receive technical assistance pursuant to Section 47607, 47607.2, 52071, or 52071.5, as applicable, based on the performance of the same pupil subgroup or subgroups for three or more consecutive years shall include a goal in the local control and accountability plan focused on improving the performance of the pupil subgroup or subgroups.”

To effectuate this change, we suggest adding the following language to the LCAP instructions:

* “LEAs, including charter schools, meeting the criteria to receive technical assistance based on the performance of the same pupil subgroup or subgroups for three or more consecutive years shall include a goal on improving the performance of the pupil subgroup(s)."

ii. Goals to Address Disparities in Performance by Student Group

Section 52064(e)(6)(A) adds: “…the instructions developed by the state board pursuant to paragraph (1) of subdivision (d) shall specify that, for any school district or county office of education with a school that meets the criteria described in subparagraph (B), the school district or county office of education shall include a goal in the local control and accountability plan focused on addressing the disparities in performance at the school or schools compared to the school district or county office of education as a whole.

Section 52064(e)(6)(B) states: “[t]he requirement described in subparagraph (A) shall apply for any local educational agency with two or more schools if, for two consecutive years, a school receives the two lowest performance levels on all but one of the state indicators for which the school receives performance levels on the California School Dashboard pursuant to subdivision (d) of Section 52064.5 and the performance of the local educational agency for all pupils is at least one performance level higher on all of those indicators.”

To effectuate this change, we suggest adding the following language to the LCAP instructions:

* “Describe the goal to address the disparities in performance at the school or schools compared to the school district or county office of education as a whole."

Thank you for considering our comments and recommendations. We look forward to continuing our collaboration with you and your staff to realize the full promise of LCFF and our new accountability system for our neediest students as we respond to inequities further exacerbated by this pandemic.

Sincerely,

Liz Guillen, Director of Legislative & Community Affairs, Public Advocates

Erin Apte, Legislative Counsel, Public Advocates

Rev. Samuel Casey, Executive Director, Congregations Organized for Prophetic Engagement (COPE)

Patricia Chavez, Director of Policy, Parent Institute for Quality Education

Jan Gustafson-Corea, Chief Executive Officer, California Association for Bilingual Education

Martha Hernandez, Executive Director, Californians Together

Sarah Lillis, Executive Director, Teach Plus

Bill Lucia, President & CEO, EdVoice

Jessica Maxwell, Deputy Director of Compassionate Systems, National Center for Youth Law

Sandy Mendoza, Director of Advocacy, Families in Schools

Kristin Power, Government Relations Director, Alliance for Children’s Rights

Kathy Sher, ACLU California, Legislative Attorney

Araceli Simeón, Project Director, Parent Organization Network

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