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Strengthening Local K–12 Accountability

The Role of County Offices of Education



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Technical appendices to this paper are available on the PPIC website.

Recent changes to the funding and governance of California’s schools give county offices of education (COEs) several important responsibilities. County offices are now charged with helping districts use their Local Control and Accountability Plans (LCAPs) to improve student performance—a critical part of the state’s school improvement strategy. Among other duties, county offices provide technical assistance to support strategic planning at districts and will eventually work with districts that fail to meet state performance expectations.

This report examines the new role of county offices and offers recommendations to strengthen the LCAP process. In general, county superintendents think the Local Control Funding Formula (LCFF)—the 2013 law that established this new financial and accountability system—is working as intended. Yet there is an undercurrent of concern about the quality and impact of district plans. A few districts have responded to LCFF by complying with state requirements without using the planning process as an opportunity to try and improve student outcomes.

Districts report that county offices have provided useful guidance thus far, but vary in their assessment of COE capacity to offer more substantial assistance in the future. We also found that some county offices are more willing than others to provide feedback to districts on the effectiveness of their plans. Indeed, some county offices have a compliance mindset regarding their new responsibilities.

Three problems warrant the attention of the California Legislature and State Board of Education. First, LCFF does not contemplate that districts might write plans that meet the letter, but not the spirit, of the law. Second, the law lacks a workable support program to provide low-performing districts with resources and guidance. Finally, there is no plan for building COE capacity to assist districts in the improvement process.

Our recommendations strengthen oversight of and support for districts and county offices. These steps preserve the local focus of LCFF—with county officials playing a leading role:

- County superintendents should ensure that districts make a meaningful attempt at a strategic plan for improvement. The specifics of the plan, however, would remain the district’s domain.
- County offices should collaborate with underperforming districts, helping them find a better path for meeting their goals.
- The state should help build capacity in both districts and county offices. In our proposal, county offices would provide most of the technical assistance to districts. We also suggest establishing a county office grant program to support district projects requiring more substantial assistance. The state-level California Collaborative for Educational Excellence would oversee the health of the plan review and assistance processes.

State policy is a rather blunt instrument of change in local schools. Mandates are most effective when local educators think new policies will help them achieve their goals for students. But educators must also have the knowledge, time, and resources to take advantage of these policies. Our recommendations recognize these lessons by embedding the district planning and improvement process in a broader continuous improvement cycle. By helping local educators build their skills and knowledge, the state would give the LCAP process its best chance for improving student outcomes in California.

Introduction

The Local Control Funding Formula (LCFF), enacted in 2013, simplified the state’s K–12 financial system and increased funding for low-income, English Learner, and foster care students. The new law also requires districts and county offices of education to develop an annual Local Control Accountability Plan (LCAP), based on a strategic planning approach to the improvement process. District performance is measured using 23 performance indicators clustered into eight state priority areas, including achievement, student engagement, and school climate.

This is our second report examining the implementation of LCFF. In 2015, we published *Implementing Local Accountability in California’s Schools: The First Year of Planning*, which concluded that most districts and county offices were working to satisfy the state’s planning requirements. But the lack of strategic planning experience in some districts led to wide variation in the clarity and effectiveness of district LCAPs (Warren and Carrillo 2015).

Developing a good plan is not the goal of LCFF. Instead, the program aims to establish a cycle of continuous district improvement through the LCAP process. That cycle begins with an analysis of the district’s outcomes that identifies its strengths and weaknesses. This analysis is supplemented with input from parents, teachers, principals, and other community members. In response to these various inputs, the district develops goals for improving student and school outcomes, and a three-year educational plan and budget for achieving those goals. District LCAPs in the second and third year also look back on the progress made in the previous year and detail changes made to the improvement plan.

There is no guarantee that the new planning process will succeed in improving district programs. Planning mandates are a staple of state and federal K–12 programs, but some districts do not have the knowledge and skills to develop a useful plan. In our first report, we recommended the state ensure that districts and county offices receive the support and assistance they need to use the LCAP process as intended. We also suggested the state give county offices more discretion to work with districts on increasing the effectiveness of their plans.

This report builds on those findings, focusing primarily on the role of the county offices of education in the district LCAP process. Specifically, it examines whether the new law gives county offices the authority and support needed to make the LCAP process work as intended. We also assess whether county offices have the capacity to succeed in their new oversight roles.

The report begins with background on county offices of education. Then, we present survey data from county superintendents, as well as findings from our interviews of county and district staff, regarding the LCAP review process. The next section looks at the LCFF provisions that trigger local or state assistance due to insufficient progress. The report concludes with recommendations to strengthen oversight of district LCAPs and increase support for struggling districts. The [technical appendices](#) provide a detailed description of the data collection methods for this research, including a copy of the survey and county superintendents’ responses.

LCFF and County Offices of Education

Few outside of the K–12 education world understand what county offices do. Fewer still understand the roles given to county offices under LCFF. This section provides a brief overview of these topics.

LCFF gives county offices oversight and assistance responsibilities in the district planning and improvement process. While these are new duties, county offices already have experience with similar responsibilities under other state programs. Beyond these responsibilities, county offices provide other educational and administrative services to districts and operate individual schools. In fact, county offices must develop their own LCAPs for schools they administer.

County offices of education and the district LCAP process

LCFF outlines two areas of COE responsibility in the district LCAP process. The first involves the development and approval of the district LCAP (i.e., plan review). The second role is assisting districts that fail to make sufficient progress improving student and school outcomes (i.e., performance monitoring and assistance).

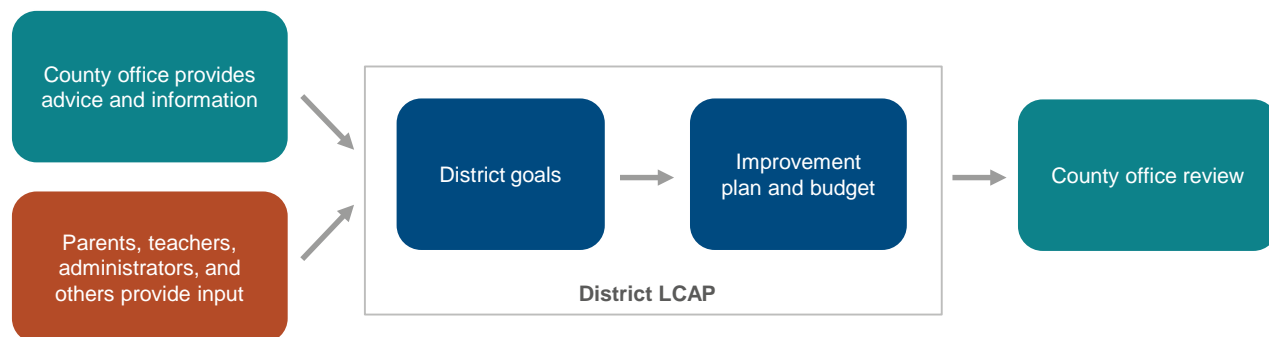
Plan review

The LCAP process asks districts to show how new funds will be used to achieve eight specific state goals. Although other state and federal programs may require district plans, the LCAP is considerably more complex and ambitious than most. Figure 1 below illustrates the basic elements of an LCAP. The plan requires districts to:

- Reflect the priorities of parents and community members in developing the LCAP. The law also directs districts to include teachers, administrators, and other staff in the process.
- Set specific numerical goals for student and school performance for each of the 23 LCFF performance measures in the eight state priority areas.
- Create a three-year plan for achieving those goals. The plan must include a budget that supports the improvement plan.

FIGURE 1

The district LCAP process create two roles for county offices



SOURCE: California Education Code sections 52060–52071.

LCFF requires county offices to provide technical assistance to districts that request help, which often includes providing information on state laws and regulations. Many county offices also advise districts on educational and budget issues in the planning process. LCFF further directs county offices of education to review and approve district LCAPs.

Under LCFF, districts must submit their plans to the county office of education by July 1st each year. Approval by the county office signals that a district LCAP satisfies the basic requirements outlined in state law. These requirements ensure that a district’s budget adequately funds its improvement plan and appropriately uses “supplemental and concentration” funds (dollars distributed based on the proportion of low-income, English

Learner, and foster care students). The new law does not give county offices the authority to approve the substance of LCAPs or to require changes to district goals or improvement plans. However, county offices may use the development and review process to help districts create more effective plans.

Performance monitoring and assistance

LCFF anticipates that districts will need help with planning and the ensuing challenge of improving schools in the eight state priority areas. The law also establishes a process for providing additional help to districts that perform below expectations. However, LCFF statutes do not clearly define technical assistance, which can include a wide array of activities. The law lists several examples—such as conducting a needs assessment of district strengths and weaknesses or assigning academic experts to assist a district—but does not limit the types of assistance that may be provided.

Table 1 below illustrates the system of oversight and assistance created in LCFF. In general, county offices must provide help to districts that request it. In addition, LCFF directs county offices to assist districts that do not demonstrate sufficient growth on at least two state priority areas for at least one subgroup.¹ County offices may also request that the state-level California Collaborative for Educational Excellence (CCEE), which was established to help districts and county offices under LCFF, assist individual districts. Districts may also request assistance directly from the collaborative.

TABLE 1

County offices and the CCEE are authorized to assist districts under different circumstances

	COE assistance	CCEE assistance
District requests assistance	Required	Optional
County office disapproves a district plan	Required	--
District fails to meet one-year targets	Required	--
State determines district needs assistance based on three out of four years of inadequate progress	--	Required ¹

SOURCE: California Education Code sections 52071–52074.

NOTES: "COE" refers to county offices of education. "CCEE" refers to the California Collaborative for Educational Excellence.

¹ CCEE assistance to districts that fail to make adequate progress over 3 to 4 years is required only after the state Superintendent of Public Instruction determines that intervention is needed.

Monitoring and assistance responsibilities become a state function when districts fail to show adequate growth in three out of four prior years.² For districts that fall into this category, LCFF gives the State Superintendent of Public Instruction (SPI) broad discretion to act—from doing nothing to virtually taking over districts. LCFF is also quite detailed about this process. First, the State Board of Education must approve the SPI's determination that intervention is needed. Second, the CCEE must assist these low-performing districts and certify to the SPI that further intervention is warranted. Only then may the SPI take the following steps:

- Revise the district LCAP and budget.
- Reverse policies, outside of a collective bargaining agreement, that prevent the district from improving.

¹ The law does not indicate the time period over which that growth is measured. Presumably, however, annual growth is implied because the mandate for county office assistance is included in a section of the Education Code that defines other COE responsibilities related to the annual LCAP process. The section also requires county offices to provide technical assistance to districts if a county superintendent does not approve the district LCAP.

² Section 52072 defines these districts as those that did not improve student outcomes for three or more pupil subgroups for more than one state or local priority in three out of four consecutive school years.

- Appoint an academic advisor to guide the district improvement process.

Most LCFF monitoring and assistance processes have yet to be tested. The State Board is still developing the LCFF accountability provisions, and therefore benchmarks for determining whether district performance is adequate do not yet exist. In addition, the CCEE is still formulating plans for how best to fulfill its mission.

COEs have experience with new LCFF roles

County superintendents already have direct experience with oversight and assistance functions similar to those outlined in LCFF. Under a set of state statutes known as AB 1200, county offices oversee district fiscal health.³ COEs review and approve district budgets each year, certifying that a district’s adopted budget will allow it to meet its financial obligations in the coming year and two succeeding years. AB 1200 further authorizes county offices to intervene in fiscally troubled districts, granting COEs the power to appoint an advisor to work with districts or to exercise “stay or rescind” powers over district spending decisions. Thus, under AB 1200, county superintendents wield considerably more authority in the fiscal arena than under LCFF.

In addition, many county offices participated in district-level academic interventions under the federal No Child Left Behind Act. From 2007 to 2013, county offices could act as academic advisors to districts as part of District Assistance and Intervention (DAIT)—California’s program to help districts that did not make adequate progress. Districts assigned to DAIT worked with an independent team of educators to choose a provider that led the district through a two-step process. The first step called for a needs assessment to determine district strengths and weaknesses through an analysis of student data, which then informed the development of an improvement plan. County offices could participate as DAIT team members and providers of the needs assessment or subsequent follow-up services.

County offices also operate a wide array of other programs. In most cases, COE programs reflect a regional approach to supplementing district programs. For instance, county offices:

- **Educate students.** County offices operate classes when a regional approach delivers more effective or efficient instruction than district programs. For example, COEs administer schools for students who reside in county juvenile halls and for students with unusual or complex disabilities.
- **Serve as fiscal agents.** County offices act as the bank for most districts, maintaining accounts for local, state, and federal funds allocated to districts, and writing checks to district vendors and employees.
- **Help districts improve their programs.** County offices coordinate services to vulnerable populations, train teachers to improve their skills, and help districts improve their administrative operations.

Local Review Process Lacks Quality Standards

County offices have two roles related to plan development and review: they provide technical assistance to districts in the planning process, and they ensure that district LCAPs meet minimum standards. Implementation of these requirements can vary considerably from county to county. Indeed, local factors, such as the initiative of the county superintendent and the interest of districts in taking advantage of the planning process, can cause the process to differ substantially. These findings reveal the limits to local control over the LCAP process.

³ AB 1200 (Eastin) was enacted as Chapter 1213, Statutes of 1991.

LCAP process is unique to each district and COE

Our survey found county superintendents generally upbeat about the LCAP process—although a substantial minority was less optimistic. Two-thirds of those surveyed said the quality of district LCAPs was good or excellent. However, one-third thought the quality was only fair. Similarly, 79 percent of superintendents thought LCAPs would improve the quality of education in our state, but 21 percent declined to register an opinion on the impact of the process (marking “don’t know”). These views come after the second year of LCAP reviews and suggest that some county office superintendents have serious concerns about how the process is unfolding.

Our interviews showed that the role of the county office in the LCAP process is different with each district. Several individuals said that a significant proportion of districts are still learning the basics of strategic planning.⁴ One COE administrator we interviewed felt that districts that had previous experience with strategic planning generally developed effective LCAPs. Districts that had no strategic planning experience were struggling with the LCAP process, but beginning to see its value.

We also heard about districts that did not use the LCAP process to assess student performance and consider options for improving. These districts behaved as if the LCAP were just a state requirement to be satisfied, echoing the findings of a 2015 report on the second year of the LCAP process (Koppich, Humphrey, and Marsh 2015). One district we interviewed, for instance, had hired an outside consultant to write its first-year plan. When new staff arrived in the district, they found the LCAP was not being used by other district staff—in fact, most district employees had little knowledge of what was in the plan—even though it satisfied state criteria.

There is also variation in the extent to which COE staff tried to help districts improve their plans. COE staff we interviewed made it clear that their role is to help improve the quality of district LCAPs—not tell districts what to do. In some cases, though, that attitude translates into a hands-off approach to plan reviews, where the county office checks for compliance but refrains from giving feedback to help make the plan more effective. More often, county offices were willing to discreetly supply advice to districts, making suggestions in private. In at least one county office, though, suggested improvements are posted online as part of each district’s LCAP approval letter.

COEs report providing a range of help to districts

In addition to reviewing LCAPs, county office staff report helping districts with planning and program issues throughout the year. Virtually all county offices we interviewed provided guidance about state approval criteria, information on changes to the LCAP template, opportunities for districts to discuss problems and share best practices, and feedback on early LCAP drafts. Many county offices also met individually with districts to work on specific LCAP issues. A couple county offices reported sending staff out to districts to gauge their needs for planning assistance or to work with district staff on LCAP issues.

In our interviews, districts found the county office’s help in these areas very useful. Close collaboration with county offices allowed the districts to keep apprised of changes in the LCAP template and, accordingly, county offices reported that very few district plans were rejected for not meeting state criteria. District staff also frequently cited the value of convening districts to discuss common problems they face.

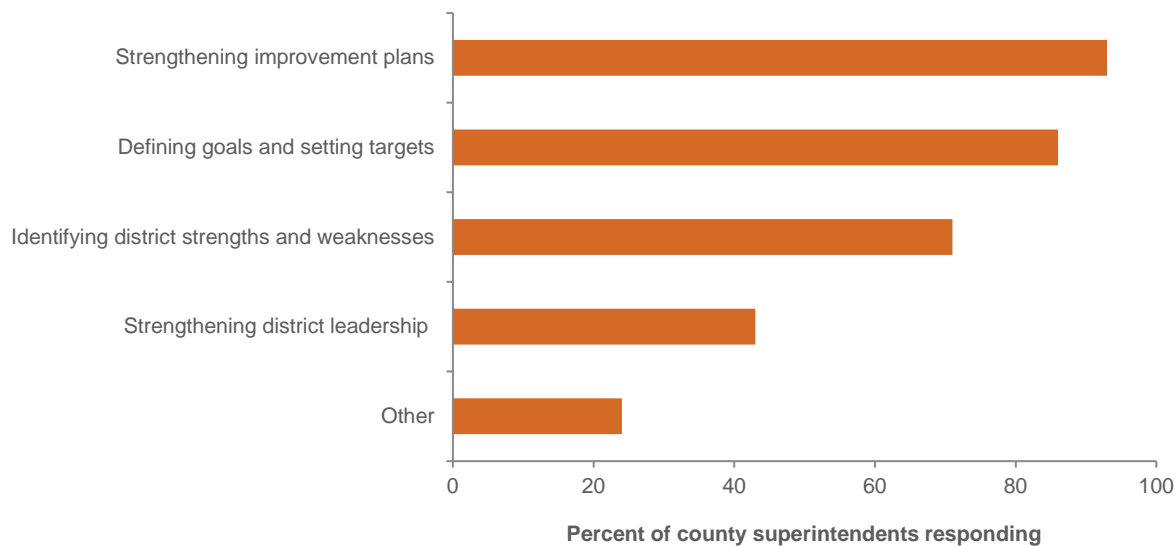
In addition to this general assistance, virtually all county offices deliver information and guidance to improve district LCAPs. Almost all county superintendents responding to our survey identified the “big picture” elements of the LCAP—a strategic approach to spending and coordinating resources to address student needs—as very

⁴ Districts have been required to develop plans for many state and federal programs. But districts must invest in that process for it to have value. For instance, the federal Title 1 program has long required districts to develop a district-wide improvement plan. Only one district we interviewed found the federal plan offered a useful process for improving district outcomes.

important aspects of the planning process. Accordingly, most also reported providing assistance in these areas. Figure 2 shows the proportion of county superintendents who report providing specific types of technical assistance to districts in 2015–16. More than 80 percent of superintendents reported helping strengthen district improvement plans and refine goals and targets. More than two-thirds responded that they helped evaluate district strengths and weaknesses. Fewer than half said they helped strengthen district leadership. And almost a quarter provided other types of advice, including helping districts with data collection and analysis or stakeholder engagement.

FIGURE 2

Most county offices reported providing assistance in the “big picture” elements of the LCAP



SOURCE: PPIC survey of county superintendents of education, 2015–16.

NOTE: This survey question asked county superintendents to indicate the types of extra technical assistance their office provided to individual districts in the preparation and approval of district 2015–16 LCAPs.

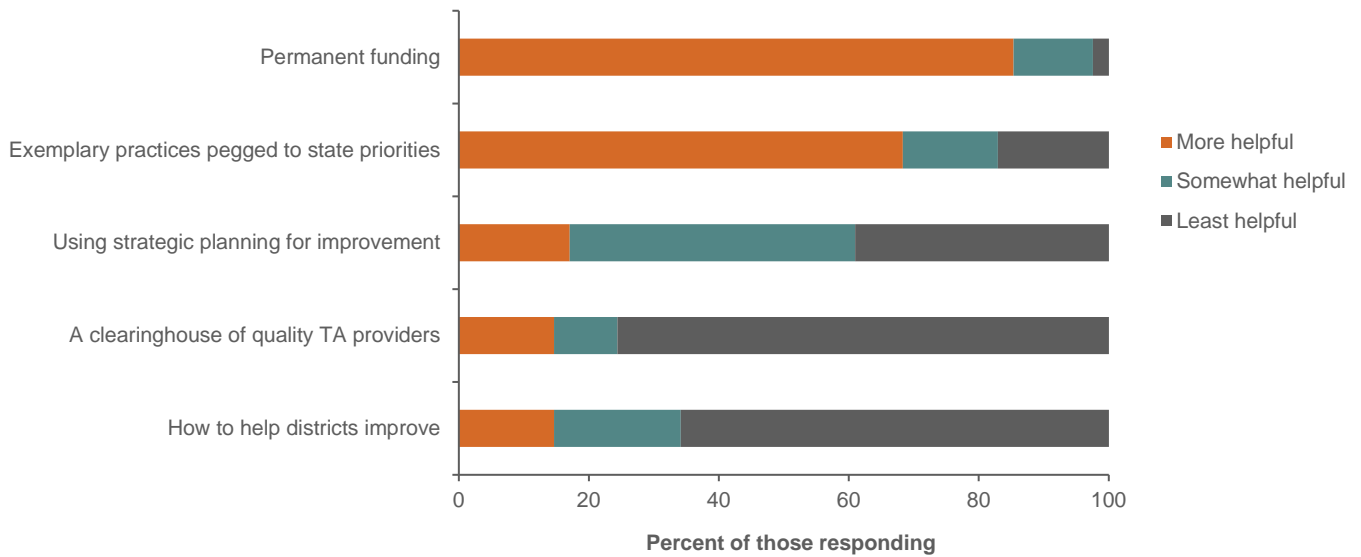
County offices would like support, too

Our survey also asked county superintendents about the types of help they could use to improve their office’s ability to assist districts in the LCAP process. Figure 3 displays their rankings of five types of resources we suggested could be useful to county offices. When asked the most valuable form of help the state could provide, 83 percent of superintendents ranked a permanent source of funding for county reviews and technical assistance at the top of the list. Currently, the state has guaranteed funding for county offices only through 2016–17.

Information on exemplary practices that are tied to the eight state priorities was ranked the second-most important resource for county offices. This information would give county offices a bank of tried-and-tested models that schools and districts could consider as they develop improvement plans. A majority of respondents (61%) identified help in understanding how to use strategic planning to improve school quality as more helpful or somewhat helpful resources. In contrast, access to a clearinghouse of technical assistance providers and advice in working with districts to improve their plans were ranked as less helpful resources.

FIGURE 3

Funding and information on exemplary practices top the list of needed resources



SOURCE: PPIC survey of county superintendents of education, 2015–16.

NOTE: "TA" refers to technical assistance.

The rankings reported in Figure 3 can also be understood in a different way: county superintendent rankings reflect what they need to help districts improve, but county offices have no source of assistance to turn to. As a consequence, county offices are beginning to develop their own resources. In our interviews, for instance, we heard that several county offices had developed lists of exemplary practices for district use. For the other areas identified in the figure—using strategic planning for improvement and lists of quality providers—county offices are on their own. As we noted earlier, the CCEE was created, in part, to assist county offices, but it has yet to begin its program for helping COEs guide districts in the planning process.⁵

Annual review process needs a bottom line

Some districts and county offices are working hard to make sure the LCAP process leads to better programs for students, while others are doing the minimum required under state law. Perhaps this should not be surprising, but it reveals the difficulty of making a state-defined process meaningful throughout the state. And even in districts that *are* trying to use the process to improve, the demands of the LCAP require new data and new ways of thinking to those who are unfamiliar with strategic planning.

Other researchers and advocacy groups have raised issues about the quality of district LCAPs. Earlier this year, research reports expressed concerns about the quality of district efforts to engage parents in the LCAP process (Families in Schools 2016), district plans for raising the performance of English Learner students (Olsen, Armas, and Lavadenz 2016), and the clarity of LCAP spending plans (The Education Trust–West 2016). Indeed, the concerns about parent and community engagement go to the core of LCFF's attempt to involve these groups in pressuring districts for better outcomes.

⁵ The 2016–17 state budget included \$24 million for the CCEE to administer a pilot program over two years to develop its program for providing technical assistance in helping districts and county offices improve student outcomes.

These concerns are symptoms of two problems with the LCFF plan review process:

- **A “compliance” mindset.** The current review process lets districts decide whether they want to develop a meaningful plan. Nothing is in place to ensure they conduct an honest assessment of their challenges and opportunities or develop a plan that addresses weaknesses and builds on strengths. The process also allows county offices to take a ministerial approach to their LCAP review and avoid the more difficult task of pushing districts to improve their plans.
- **Limited strategic planning experience.** Districts and county offices may not have the expertise to generate high-quality plans. This problem is relatively easily solved, although it takes money, time, and an understanding about how best to build local capacity.

Since the late 1990s, school reformers have looked for state and federal policies that can effectively promote higher functioning K–12 schools. State policy represents a rather crude way of inducing change in schools, as local administrators and teachers must interpret and implement new requirements in ways that can frustrate the intent of the policy (Spillane et al. 2002). Accordingly, improving schools through top-down mandates works best when educators see the changes as helping them teach more effectively. Importantly, local administrators must also have the time and resources to develop effective responses to the reforms (Leithwood et al. 2004).

These perspectives may explain some of our observations concerning LCFF. If districts make only weak attempts to involve parents and the public in planning, does this mean districts do not want additional input? Or does it reflect the fact that districts do not know how to obtain useful information from these groups? Both of these problems represent significant barriers to the success of LCFF. In particular, the state needs to consider mechanisms that could push reluctant districts to develop a meaningful improvement plan. LCFF envisions that parents and community members will provide this pressure if they perceive that student outcomes are too low. If this does not occur, pressure would need to come from the state in some form, and county superintendents are well positioned to encourage districts to take the process seriously. We discuss possible solutions later in this report.

LCFF Needs Effective Performance Oversight

LCFF acknowledges that districts not meeting the state’s performance expectations should receive attention from the county superintendent or state. Because the language of LCFF is vague, both district and COE staff wonder how the process will work. Yet our survey results suggest that county offices expect to provide a wide range of assistance—perhaps unrealistically wide—to underperforming districts. We also found that some districts would rather obtain technical assistance from sources other than their county office. Because performance monitoring and assistance is so critical to the success of LCFF, the state needs to refine its process for underperforming districts that need help to improve student outcomes.

Uncertainty about process raises concerns

The role of county offices and the CCEE in helping underperforming districts was not clear to most districts and COEs we interviewed. LCFF requires county offices to assist districts that do not make short-term progress, but the practical implications of this requirement raised questions. Statute is not specific about the process or the focus of technical assistance. But as we discuss further below, COE staff expect to play a central role.

County office staff generally see working with underperforming districts as a collaborative process. Many COE staff we interviewed had participated in the DAIT program, which convinced them that helping districts improve

required a supportive county office partner. There was less consensus, though, about the goal of the process. Some think it should focus first on smaller issues if districts are reluctant to cooperate; others would begin with more substantial issues that directly affect the quality of services in the classroom. County offices believe that their knowledge of each district’s strengths and weaknesses makes them a valuable part of the intervention team. Most also feel they can contribute as technical assistance providers.

But it is not clear whether county offices are in a position to provide needed technical assistance. Smaller county offices are generally unable to maintain the necessary staff to meet the wide range of possible district needs. Even larger county offices typically have not reached out to districts to determine the specific types of help needed. During our interviews, we encountered only a couple of county offices that surveyed districts about the help they need, although several COE administrators said district LCAPs can provide guidance on districts’ needs. As a result, it seems unlikely that all county offices know whether the technical assistance they provide aligns with the needs of districts in their counties.⁶

From a district perspective, educators we spoke to seemed generally comfortable with COE help in a collaborative process of evaluation and assistance. They recognize that districts often need a neutral force to help make difficult reforms, but they do not want county offices dictating the direction of change. Districts are also wary of assuming that county offices will be the presumptive provider of technical assistance. Understandably, they want choices that yield the highest quality at the lowest costs, and they believe COE services may not always be the best option.

While our sample of district interviews was small, we heard a wide range of district perceptions about whether county offices have the skills and knowledge to help districts improve. Small districts rely on county offices more heavily for training and advice than larger districts, and were generally more comfortable working with COEs. Larger districts tend to have more specialized staff assigned to the improvement process, and administrators sometimes felt that district staff knew more than COE employees about helping districts improve. We also encountered district administrators who felt county office administrators were focused on internal COE matters and did not place a priority on supporting districts. Thus, for many districts, county offices will have to demonstrate they can play a constructive role in the process.

In our view, the evidence clearly suggests that performance monitoring and assistance under LCFF needs to be structured in such a way that educators feel the process is designed to support them, not tell them what to do. As discussed earlier, teachers and administrators will embrace state programs and laws if the new policies are consistent with their own goals and objectives for schools. The evaluation of DAIT found similar results—district leaders welcomed DAIT when they believed it would help the district achieve its goals. This lesson was also clear to educators we interviewed who had participated in DAIT. As more than one COE administrator observed during our interviews, helping districts in the improvement process requires strong working relationships.

County superintendents see large future role

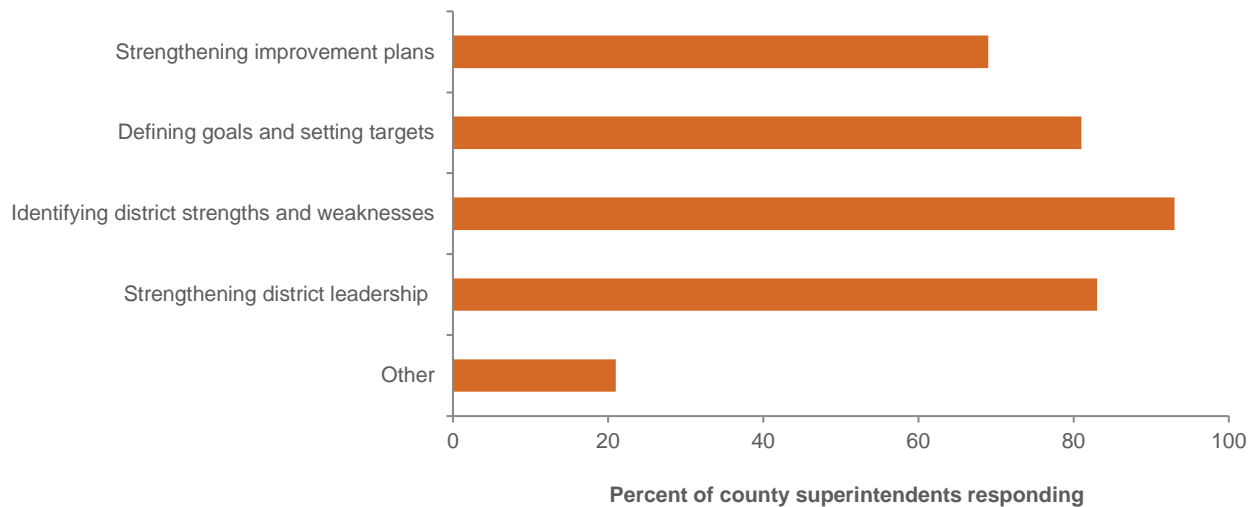
Our survey found that county superintendents see their agency as the primary source of help for underperforming districts. More than 70 percent of county superintendents responding to our survey said they expect to provide the majority of assistance needed by districts under LCFF in the future. The other 30 percent said they would assist in many areas and help districts find other sources for the rest. This result is somewhat surprising, since even small county offices often report the expectation of providing the majority of needed assistance—despite the fact they do not have staff to provide the full range of help districts may need.

⁶ We also heard that the statewide association for county office superintendents was piloting a self-assessment instrument that would help county offices assess the types of technical assistance that was available to districts.

Superintendents think low-performing districts will need more of the same types of technical assistance that county offices have already been providing to districts. As Figure 4 illustrates, superintendents believe their county office will provide a broad range of help to districts. Almost all county offices (93%) expect to help districts evaluate their strengths and weaknesses. More than 80 percent of superintendents indicated they expect to provide technical assistance to strengthen district leadership (83%) and help districts define LCAP goals and targets (81%).

FIGURE 4

County superintendents believe underperforming districts will need help identifying their strengths and weaknesses



SOURCE: PPIC survey of county superintendents of education, 2015–16.

NOTE: This survey question asked county superintendents to indicate the types of technical assistance their office anticipates that districts will need to improve on LCAP outcomes. Districts must improve on more than one of the eight state priorities for one or more significant pupil subgroups, including English Learners, foster youth, and low-income students, among others.

Interestingly, our survey shows that county superintendents expect a somewhat different mix of services during later stages of LCFF. For instance, the proportion of superintendents who anticipate providing technical assistance in the area of district leadership (83%) is almost double the percentage of county offices that supplied such assistance as part of the 2015–16 review process (see Figure 2). More county superintendents think they will evaluate district strengths and weaknesses as well (83% compared to 73%). Somewhat fewer think they will help districts with their improvement plan (69% to 93%) or provide assistance on defining LCAP goals and targets (81% to 86%).

Oversight process needs attention

Based on these findings and observations, we think the state needs to be more explicit about how the performance monitoring and assistance process will work. There are three issues that demand more attention:

- County office capacity.** While county superintendents envision a large role for their offices in the LCAP process, their ability to provide districts with needed services remains in question. And districts may not want the help that county offices offer. Thus, the state needs to consider the roles of county offices in the LCAP process, including building COE capacity to work constructively with districts and helping COEs that are unable to provide the full range of support services.

- **District readiness and buy-in.** The LCFF’s oversight opportunities seem unlikely to provide the kinds of help that most struggling districts need. County offices must provide technical assistance when districts make little progress over the course of the past year, but a one-year performance problem is unlikely to generate the district readiness and support needed to justify an in-depth needs assessment and planning process. Moreover, districts have little control over COE technical assistance, which could only increase their resistance.
- **Limits of state-level intervention.** Intervention by the CCEE also has significant drawbacks. The process is optional, depending on the willingness of the SPI and State Board of Education to take direct action in a district, and can lead to a virtual state takeover. In addition, the powers given to the SPI suggest that intervention is intended for districts that refuse to make changes that the CCEE believes are needed.⁷ While this process may be appropriate for districts that make no attempt to improve, it represents a rather limited and adversarial process—just the opposite of what our research suggests is needed.

What is missing is an alternative between short-term COE assistance and the adversarial SPI process, one that would appeal to districts as a path that leads to better outcomes. This new oversight option could create other benefits as well, such as reinforcing the importance of the LCAP review process and strengthening incentives for districts and county offices to collaborate. In the next section, we describe possible changes to LCFF that would address this and other challenges identified in this report.

Embed LCAPs in a Continual Improvement Cycle

Looking at both the plan review and performance oversight components, our research found three important problems with the local LCAP process. Annual reviews need to be bolstered, the performance monitoring and assistance process needs to be made less adversarial and more collaborative, and the general dearth of technical assistance available to districts and county offices needs to be remedied.

To address these problems, we suggest several changes that would embed the LCAP process in a broader continuous improvement cycle in each county. This cycle would be driven by the three-year LCAP planning timeline. County offices would help districts think strategically about how to improve and would collaborate with districts that fail to meet state performance targets. But rather than focus primarily on the few districts with major problems, our alternative calls on the state to support the cycle of improvement in *all* districts.

To develop our alternative, we looked at the structure of district fiscal oversight under AB 1200. The LCAP process has many parallels to AB 1200. Most importantly, both use the county superintendent to act on behalf of the state to ensure that district plans follow state guidelines. LCFF, however, does not give county superintendents the power that AB 1200 grants to ensure districts follow the spirit of the law. The performance oversight provisions of the two laws are also different. AB 1200 gives county superintendents clear authority to intervene in districts threatened with bankruptcy, whereas LCFF is more vague, requiring county offices to provide unspecified technical assistance after only one year of substandard performance.

Table 2 illustrates how our alternative process parallels the existing AB 1200 process. The table also includes the current LCFF process for comparison purposes. The top half of Table 2 displays the proposed changes to the annual plan review process. The bottom half outlines a proposed performance oversight process. Additional details are described below.

⁷ The SPI intervention process is very similar to the steps taken when districts are financially insolvent.

TABLE 2

The LCFF oversight process could parallel the design of AB 1200

	Current LCFF	Proposed LCFF	AB 1200
Annual reviews			
Authority to disapprove plan	Yes	Yes	Yes
Approval criteria	Use of state template, adequate budget, appropriate use of supplemental and concentration funds	Meets state process guidelines for LCFF plans	Meets financial obligations for next three years
Consequences for disapproval	Revise plan	Public COE plan critique	Budget review committee
Appeal process	No	Yes	Yes
Identification of areas for future attention	Optional	Required for low-performing districts	Optional
Performance oversight			
Authority to act	Yes	Yes	Yes
Criteria for action	Fails to improve on more than one state priority	Lack of gains on three-year LCAP or disapproved LCAP for two consecutive years	Potential for fiscal insolvency during next three years
Possible actions	Provide technical assistance	Help district select provider for needs assessment and/or technical assistance	Conduct studies, assign a fiscal expert to the district, other
Funding	District pays for technical assistance	County office grants for district improvement projects	None. Costs are shared by county office and district
Appeal process	No	Yes	Yes

SOURCES: Fiscal Crisis and Management Assistance Team, 2006. Education Code sections 52060–52074.

Strengthen the annual review process

Since county offices are the only entity reviewing district plans, whatever mechanism the state develops to highlight problems with LCAPs must start with the county superintendents. Given the uncertainty about COE capacity, we see value in developing a local process of continual improvement that uses county offices as a critical friend to districts. Accordingly, our revised plan review process starts by giving COEs the authority to disapprove LCAPs only when districts fail to heed plan guidelines.

The CCEE should be responsible for developing these guidelines, which would have several benefits. First, the guidelines would provide a clear signal to districts about the state’s expectations for the LCAP process. As Michael Fullan discusses in a 2015 report on the LCAP process, the guidelines should encourage a healthy planning process in districts—a perfect plan is not the goal (Fullan 2015). Massachusetts, for instance, developed a five-question process that gauges school-level planning quality (see accompanying text box). The guidelines would also give more structure to districts and county offices that have had little experience with strategic planning. And they would help standardize COE reviews across the state. As with the existing process, however, the content of district plans would not be subject to county office approval.

Massachusetts' School Plan Standards

In the early 2000s, Massachusetts developed standards for improvement plans for schools that were considered critically low performing. The five process standards ask whether improvement plans:

- Analyze data to identify performance gaps and the reasons for those differences.
- Identify specific objectives that are grounded in the reasons for poor performance.
- Identify specific strategies that will likely lead to improved student performance.
- Represent a clear and specific guide to implementation.
- Will result in broad support for the successful implementation of the plan.

(Massachusetts Department of Elementary and Secondary Education 2004.)

County offices would be required to make identified problems public in a disapproved plan. The county office would publicly post its analysis of the disapproved LCAP, informing parents and the public about its shortcomings. LCAP reviews take place in late summer, and districts may be unable to quickly change plans that do not meet state guidelines. Thus, rather than require a district to revise its plan, our proposal would elevate the issues to the broader school community, and give the district time to develop a plan that satisfies the state's process guidelines.

Here, our LCFF proposal differs from the AB 1200 process, which requires county offices to assemble a budget review committee that provides an independent assessment of the problem district's budget. Fiscal problems are often easier to identify and address than academic problems, and changing a district's educational plan is not done so simply. Rather than take a short-term approach to academic planning problems, our alternative would give districts and the county office a year to bridge their differences. If a district fails two years in a row to assemble an adequate plan, the county office would engage the district in the more intensive performance oversight process.

In addition to approving plans based on process criteria, county superintendents would also be required to identify issues or problems that lower-performing districts should consider when developing future plans. This would give county offices an avenue for raising issues that have not been addressed adequately in district plans. The goal of this feature of our proposal is to ensure that district leaders, teachers, principals, parents, and the broader community become aware of significant issues that are not tackled in the LCAP.

Plan disapprovals and suggestions for future consideration have no immediate impact on districts. In the short run, they provide a public airing of differences by the county superintendent. In the long run, however, issues identified by the county office play a role in the performance oversight phase of LCFF.

Add a three-year performance review

The bottom half of Table 2 summarizes the performance oversight process we suggest for LCFF. Again, we use county offices as a surrogate for the state. Our goal is to create local expectations for continual improvement, and our model asks county offices to collaborate with—not intervene in—struggling districts. The goal of the process is to help districts achieve their goals for students.

We would link this oversight process to the three-year LCAP cycle: districts that do not meet a sufficient number of LCAP targets at the end of the three-year cycle would participate in this new performance monitoring review. This process begins with districts and county offices working together on revising the district plan or finding a

neutral provider for a needs assessment. The district and county office would also work together to identify technical assistance providers that might be needed to implement the resulting plan. Districts would have the final choice of providers. To make sure district goals drive the process, county offices would not be allowed to conduct the needs assessment. However, the county office would be allowed to deliver training or other improvement services if desired by districts.

In addition, any district that had its LCAP disapproved by the county superintendent for two consecutive years would also enter the oversight process. These districts had the opportunity to remedy problems with their LCAPs after the first disapproval, but failed to do so. The goal for districts with disapproved plans is to help them develop a plan that has a higher likelihood of improving student performance.

Support continual improvement in all districts

As discussed above, we found a significant need for assistance among both districts and county offices. While LCFF creates the CCEE to advise and assist districts *and* county offices, there is no clear delineation between the domains of the county offices and the CCEE in regards to district support. Our alternative makes county offices the primary source of direct assistance to districts, ensuring a local system of continual improvement by giving these offices resources to address significant district improvement projects.

The list of needed technical assistance is long. As our survey revealed, for instance, districts need information on “best practice” services and programs that are linked to the eight state priorities. Technical assistance resources should also include more tailored services that could help districts identify why certain student outcomes are stagnant, or improve teacher assignment practices so that all classrooms have appropriately credentialed teachers.

The CCEE will be able to supply general information that most districts would find useful—such as research-based practices that are tied to the eight state priorities. But it probably will not be able to refine this information for individual districts or help districts choose among available options. California has almost 1,000 school districts and more than 10,000 schools. Expecting the CCEE to work with individual districts seems an unwieldy role for a state-level entity. These individualized activities could, however, be fulfilled by county offices and other private or nonprofit providers. But there are two problems with this idea. First, as our survey results show, the law is generally silent about paying for these activities. Second, districts need to be given control over the design and focus of these projects as well as the choice of providers.

For this reason, we think the state should give each county office funding to support district projects requiring more substantial technical assistance. Eligible projects would have to address a specific need for improvement identified in a district’s LCAP. The funds are not intended for expenses that are typical and foreseeable—such as staff training on the Common Core mathematics curriculum. But they could support an investigation into why a district’s students are not doing well on Common Core mathematics and ways math instruction can be made more accessible.

These funds would pay for the cost of needs assessments and resulting services for districts that do not meet state performance targets at the end of the three-year LCAP process. But funding levels should be sufficient to assist *any* district that demonstrates a pressing need for investing in better practices. To make this capacity-building funding go further, we suggest that it match the level of resources districts are willing to invest. The matching ratio could differ depending on the district’s situation. For example, districts that do not meet state targets on the most recent three-year LCAP could be asked to contribute 25 percent of the cost of services. Districts that fail in a significant number of state priorities could be required to supply 40 percent of the costs, whereas districts in less dire situations could contribute 60 percent.

Support continual improvement for COEs

The LCAP process requires a sensitive and competent county office team. But, thus far, the state has not focused on county offices outside of providing a small amount of money for the plan review process. In our proposal, the CCEE would not only address issues that challenge county offices in the district LCAP process, but also be responsible for supporting and refining the countywide system of continual improvement.

While county offices would provide the majority of LCAP technical assistance and oversight responsibilities, the CCEE would be charged with monitoring the effectiveness of the LCAP process as a whole to ensure districts get the help they need to improve. In the immediate future, this job would involve developing standards for plan reviews and defining the performance monitoring and assistance process. It would also entail training county offices in both the substantive and process aspects of their new roles. The CCEE could further survey districts periodically to assess COE capacity and establish alternatives in the event a county office is unable to provide high-quality information and guidance.

The CCEE could also monitor the implementation of the COE technical assistance grant program. This could include establishing guidelines for setting district priorities for local funding requests, evaluating whether sharing ratios are appropriate, and assessing the impact of projects approved by county offices. The state collaborative could also evaluate the impact of different types of training or services, as well as assess the effectiveness of providers.

In short, rather than providing technical assistance to all districts and county offices, we think the CCEE is better positioned in an oversight role. While some direct assistance to districts would fall to the state collaborative, county offices would be the primary point of contact for districts. This would allow the CCEE to ensure that the *system* works effectively—that county offices develop the knowledge and skills needed to help districts improve student outcomes, make high-quality technical assistance widely available to districts, and satisfy the most pressing local needs.

Conclusion

The LCAP process challenges districts to develop goals and improvement plans that reflect the needs of students and the desires of parents and other community members. For some districts, the demands of the process are indeed challenging. In general, our survey and interviews find that the districts and county offices are working hard to make the LCAP process pay off in the form of better outcomes. But the process is not working well everywhere.

County offices are involved in three major areas: the LCAP review process, the performance monitoring and assistance process for struggling districts, and general assistance to districts in the improvement process. We identified a core problem with LCFF in each of these areas:

- Districts and county offices may adopt a compliance attitude toward their LCAP responsibilities, which undercuts the effectiveness of strategic planning. State law has no remedy to address these situations.
- LCFF does not appear to create a process that will lead underperforming districts on a path to better outcomes. The state needs to clarify the performance monitoring and assistance program, and ensure that the process is seen by districts as an opportunity to achieve their goals for students, not as an intervention.
- There is no clear plan to support county offices in building district capacity to devise and implement better programs. County offices also have their own needs in the areas of planning, analysis, and oversight.

To address these issues, we developed an alternative that strengthens the local improvement process and system of support. Consistent with LCFF, the county superintendent would be responsible for monitoring district plans and working with districts that fail to meet state performance targets. County office staff know a great deal about the districts in their counties, and our model takes advantage of this knowledge. In addition, many offices have direct experience working with districts to identify and address problems that inhibit better performance. Though our proposal expands the role of county offices, districts retain control over the content of the improvement plan.

Our alternative clarifies the performance monitoring and assistance process. Rather than telling districts what to do, we ask county offices to play a positive role with districts, supporting them in finding a better path for meeting district goals. Districts that do not show the progress expected by the state over the longer term would get additional support—and a COE partner in the improvement process. We include a countywide source of funding that would reinforce the collaborative nature of the relationship. Again, this process is designed to help districts achieve their goals—not tell them what they should do.

County office assistance would not be limited to those districts with substandard performance. Instead, the LCAP process and the performance review process would operate as components of a countywide continual improvement cycle. This would provide a source of support for those districts that use the LCAP process to address performance problems. And, by making capacity building a priority for all districts, we hope it would reduce the stigma of the assistance process for low-performing districts.

Our proposal also refines the role of the CCEE to focus on ensuring the health of the LCAP process and supplying the training county offices need to do their jobs successfully. Existing law charges the CCEE with providing technical assistance to districts and county offices, but does not delineate when county offices should provide technical assistance to districts and when the CCEE should do so. In our alternative, county offices are the primary source of technical assistance to districts and the CCEE helps county offices build capacity to meet district needs. The CCEE would also develop standards to evaluate and improve the quality of the plan review and performance monitoring processes.

These new COE roles and responsibilities highlight the need for greater COE capacity. Similar concerns were raised after the passage of AB 1200, but time has shown that county superintendents were able to develop the capacity to play this role effectively. This did not happen overnight; it took time and support from the state and others. We expect the situation would be similar in the academic realm. With support from the state, CCEE, and other COEs, county offices can do an effective job in supporting district improvement plans, thereby increasing the likelihood that LCFF will improve California's schools.

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