

Plan Alignment and Coordination Project Summary of Findings and Potential Next Steps

This document summarizes the findings from the Plan Alignment and Coordination Project (PACP). The summary begins with a high level compare and contrast between select requirements for the Local Control and Accountability Plans (LCAP) and the Federal No Child Left Behind Act of 2001 related to local educational agency (LEA) Plans, pursuant to Section 1112 (6312), Subpart 1, Part A of Title I of Public Law 107-110. The components that were compared pertain to the planning, development, and implementation process that is necessary for the successful completion of these two plans. This comparison is reviewed relative to the LEA responses to the quantitative and qualitative surveys.

Based on the PACP findings, some potential next steps are presented for the California Department of Education (CDE) and the State Board of Education (SBE) to consider for supporting state-level guidance on plan alignment and coordination that reduces duplication of effort and maximizes efficiency for LEAs. To set the context for these next steps, it is important to note that the LCAP provides the foundation for California to transition to a new accountability system. With a focus on enhancing school and district capacity to support meaningful learning for all students, the LCAP provides transparency of decision making processes in support of student achievement on a broader set of outcomes that are aligned with college, career, and citizenship readiness. The intent of exploring the alignment and coordination of other plan requirements with the LCAP state priorities is to drive continuous improvement and allow for the differentiation of performance in schools and districts to provide timely support, not to position the LCAP as a traditional compliance tool used for monitoring purposes.

The SBE took action at its November 2014 meeting to adopt the proposed permanent regulations governing the LCAP template. The proposed regulations are pending the Office of Administrative Law (OAL) approval. Transitioning to the second year of implementation, the adopted template will be used for the initial submission of LCAPs and annual updates. The SBE may adopt the template, or revisions to the template in accordance with the requirements of the Bagley-Keene Open Meeting Act (Article 9 [commencing with Section 11120] of Chapter 1 of Part 1 of Division 3 of Title 2 of the Government Code). When adopting the template, pursuant to the requirements of the Bagley-Keene Open Meeting Act, the SBE shall present the template at a regular meeting and may only take action to adopt the template at a subsequent regular meeting. This requirement shall become inoperative on January 31, 2018.

Summary of Findings

Compare and Contrast-Planning, Development, and Implementation Process

Adopted Template:

- LCAP: completed using the SBE-adopted template.
- LEA Plan: no mandatory template is required.

Timeline of Submission:

- LCAP: on or before July 1, the local governing board shall adopt (prior to the start of the academic/fiscal year). Not later than five days after adoption of the LCAP, the governing board shall file the LCAP with the county superintendent of schools for district LCAPs and the State Superintendent of Public Instruction (SSPI) for county LCAPs. The LCAP shall be approved on or before October 8.
- LEA Plan: due by the March SBE Meeting for the first year and as needed thereafter. In any year, LEA Plans must be approved by the SBE by its March meeting in order for the LEA to be eligible for current year funding.

Duration:

- LCAP: effective for a period of three years, with an update required every year.
- LEA Plan: submitted for the first year and effective for the duration of the agency's participation unless the LEA's status changes.

Revision/Update:

- LCAP: Each LEA shall update annually.
- LEA Plan: Each LEA shall submit an LEA Plan for the first year and periodically review and, as necessary, revise its plan. When identified for Program Improvement (PI), the plan shall be reviewed and updated annually.

Review:

- LCAP: reviewed to measure progress toward goals and the actions to support the goals. The LEA may revise its plan as part of the annual update.
- LEA Plan: Each LEA shall periodically review and, as necessary, revise its plan. The LEA shall submit the revised plan to the state educational agency (SEA).

Adopt Plan/Update:

- District: LCAP is adopted by the local governing board.
- County: LCAP is adopted by the local governing board.
- Charter School: LCAP is adopted by the charter school governing board.
- LEA Plan: is approved/adopted by the local governing board.

Approval of Plan/Update:

- District: LCAP is approved by the county office of education board.
- County: LCAP is approved by the SSPI.
- Charter School: charter school authorizer reviews the LCAP as part of its regular oversight duties.

- LEA Plan: is approved by the SEA.

The compare and contrast presents the variation in planning requirements that LEAs must manage. Not surprisingly, a theme that emerged from the survey responses is the need for more support to align and coordinate plans. In particular, LEAs are seeking: (1) consistency in terminology used in the plan template, (2) guidance that is clear and simple, (3) alignment of the various timelines, and (4) comprehensive planning tools to streamline the planning process. This in turn may shift the focus from properly completing the template, to concentrating on student achievement and system support. Below are potential next steps from the PACP that are intended to address these issues.

Potential Next Steps

1. *Align School Plan and Reporting Requirements with the LCAP State Priorities.* The CDE modified the 2013–14 School Accountability and Report Card (SARC) template to better align with the SBE adopted LCAP and the resultant changes to the state and federal accountability reporting requirements. The SBE adopted the modified SARC template at its July 2014 meeting. The CDE should also initiate a process to support the alignment of the Single Plan for Student Achievement (SPSA) with the LCAP state priorities. Consistent with *Education Code (EC)* Section 64001, district superintendents shall review SPSAs to ensure specific actions included in the LCAP are consistent with strategies in the school plans.

Similar to the modifications made to the structure of the SARC template, the CDE should develop a user-friendly and comprehensive plan template that facilitates the alignment of LCAP actions with SPSA strategies, while continuing to be responsive to state and federal requirements. This alignment will also assist parents/guardians and community members to gauge the performance of schools in relation to the district LCAP.

Although the use of the template for the SARC and SPSA is optional, the specific content requirements for both are grounded in statute. Therefore, to completely align the structure of the reporting tools with the required elements, proposed changes to legislation may need to be developed. If the proposed changes are adopted, subsequent changes in program support will be completed to streamline the submission of plans and expedite the identification of appropriate systems of support.

2. *Initiate the Next Phase of Plan Alignment Analyses and Activities.* The comprehensive review of the LEA Plan requirements relative to the LCAP state priorities provides an important starting point for program experts to further explore necessary changes that support plan alignment. The CDE should continue to coordinate an integrated workgroup comprised of representation from Titles I, II, and III, in addition to expertise from areas such as charters, special education, education data, accountability, assessment, and fiscal. For example, a more detailed analysis of the Title III Plan (i.e., Annual Measureable

Achievement Objectives 1, 2, and 3) relative to the LCAP state priorities represent the next phase of plan alignment activities. In addition, this workgroup could provide the support necessary to develop proposed legislative changes as noted in the next steps to align school plan reporting requirements with the LCAP. This group will also incorporate continuous feedback from LEAs, parents/guardians, and the larger education community to support the cycle of improvement and support that is proposed in the continuation of outreach efforts that is described below.

3. *Continue Outreach Efforts to Expand Stakeholder Engagement to Strengthen an Integrated System of State Support.* As California pursues a new accountability paradigm that focuses on meaningful learning for all students, supported by professional skilled educators with access to adequate resources, this paradigm shift relies on continuous engagement with stakeholders most impacted by the plan alignment and coordination changes. The Quality Schooling Framework (QSF) is a state-level resource that is being expanded to support planning and alignment coordination. Resources are being designed to initiate processes for plan development and implementation, not merely compliance, and are being integrated into the QSF. To strengthen the QSF, key stakeholders such as the State and Federal Program Directors (SFPD), Regional System of District and School Support (RSDSS), and California County Superintendents Educational Services Association (CCSESA) have provided guidance, tools, and resources. The CDE will continue to expand outreach to include additional stakeholder groups (e.g., Bilingual Coordinators Network [BCN], California State PTA). In addition to the QSF, comprehensive planning tools such as frequently asked questions (FAQs) and a cross-walk of various plan requirements will be developed.

Aligned plan requirements are a critical conversation starter that could bridge the gap between student performance and the identification of appropriate resources that are necessary to strengthen local capacity to improve performance across the systems. The alignment of these requirements will also inform the California Collaborative for Educational Excellence (*EC Section 52074*), a state system of support that has been established to provide advice and assistance to LEAs (charter schools, school districts, and county offices of education) in achieving the goals set forth in the LCAP.

4. *Pursue Streamlined Submissions of Required Plans through an Electronic Process.* Stakeholder input from the quantitative and qualitative surveys provided many suggestions for California to support an integrated electronic, Web-based submission process for state and federal plans. If a Web-based system becomes available to develop and submit required plans, LEAs noted the advantages of this system. Specifically, having remote access to the contents of the plan allows for: (1) collaborative input; (2) drafting and revising on a timely basis; and (3) easier access for review and annual updates. In essence, the plan could become a living document that fosters continuous improvement and features well-timed, accessible, and actionable data for use by educators, parents/guardians, community members, and policymakers. LEA responses also revealed that data

entry can be burdensome, thus, if data could be pre-populated from existing data systems, then LEAs will have access to a more user-friendly option for planning. This option could also provide an accountability data “dashboard” linked to state and federal plan requirements that organizes multiple indicators and provides transparency.

5. *Identify a Process for LEAs to Align and Coordinate State and Federal Planning Requirements.* Given the expectations of the state priorities that are reflected in the LCAP, and the additional expectations that are identified in the LEA Plan, it is apparent that the continuous improvement goals of the LCAP are quite different than the goals that are captured within the federal requirements. Following the completion of the first year of implementation, the cycle of continuous improvement that is fostered through the LCAP has yet to be realized and fully understood, as noted by LEAs that reported out on lessons learned at the November SBE meeting (<http://www.cde.ca.gov/be/ag/ag/yr14/documents/nov14item13.doc>). Thus, identifying submission processes for aligning and coordinating state and federal requirements needs further exploration.

This exploration will be positioned within the context of *EC* Section 52064 (g) that states the adoption of a template or evaluation rubric by the state board shall not create a requirement for a governing board of a school district, a county board of education, or a governing body of a charter school to submit a local control and accountability plan to the state board, unless otherwise required by federal law. The Superintendent shall not require a local control and accountability plan to be submitted by a governing board of a school district or the governing body of a charter school to the state board.

For example, both the LCAP and the LEA Plan have a required timeline for submission, but the submission dates are not completely aligned (i.e., LCAP is due at the beginning of the fiscal year and LEA Plan is due near the end of the fiscal year). Some additional requirements that are explicitly referenced in the LEA Plan that could be further explored to better align with state requirements include the following:

- References to and inclusion of the following subgroups: migratory children, neglected or delinquent youth, Indian children, and homeless children or immigrant children. While these subgroups are captured in the goals and actions for all students in the LCAP, the terminology used to distinguish subgroups varies between the LCAP and the LEA Plan.
- Teacher recruitment and incentives for teaching low-income and minority students, and the requirement to hire highly qualified teachers.
- Requirements to identify high quality effective curricula aligned with state standards and the dissemination of such curricula.
- Review and effectiveness of the actions and activities the schools are carrying out with respect to professional development.

To implement this proposed next step, the CDE could examine the advantages of approaching the U.S. Department of Education (ED) with the request to submit state requirements that align with federal requirements of the LEA Plan. This may involve the submission of the LCAP specifically, or possibly identifying an alternate submission process (e.g., the expansion of the Consolidated Application [ConApp]). The SBE could augment the current state requirements with the non-aligned federal requirements or seek a waiver from the ED for the non-aligned federal requirements. Some of these non-aligned elements may be specifically missing from the LCAP, or in need of further alignment and coordination to provide clarity and consistency. Upon further exploration of this possibility, a recommendation for the SBE to take action may be presented at a future meeting.