How Districts Planned for Pandemic Learning:

Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

TABLE OF CONTENTS

How Districts Planned for Pandemic Learning:
Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

Executive Summary

In September 2020, local education agencies ("LEAs") in California adopted Learning Continuity and Attendance Plans ("Learning Continuity Plans"). These plans included key information on how LEAs were preparing to provide instruction, programs and services to their students during the global COVID-19 pandemic. Among other requirements, LEAs had to include information in their Learning Continuity Plans about: their engagement of important stakeholders; additional supports for certain students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, and students with disabilities); planning for in-person instruction; and how they would identify and mitigate instructional loss that their students would likely experience due to disruptions in education during the pandemic.

This report provides a snapshot of LEA planning during COVID-19. We reviewed Learning Continuity Plans adopted by 48 LEAs across the state. We analyzed these plans not only to determine whether LEAs met legal requirements, but also to find out how these LEAs were planning and investing funds to support all students and especially students with unique needs and students of color, who have been disproportionately impacted by the pandemic.

We identify in this report a multitude of promising practices that LEAs planned to implement. LEAs can draw on these promising practices as they develop their Local Control and Accountability Plans ("LCAPs") for the 2021-22 school year and make plans for serving students with unique needs.

Unfortunately, we also saw that many LEAs provided limited information on how they were investing money and resources to support California's most underserved students – leading us to wonder whether they were investing in these supports at all. Given the significant increase in funding LEAs have received this year through state and federal relief funds, LEAs should engage in thoughtful planning on how to use those dollars to improve supports for students with unique needs, and they must drastically increase transparency about those plans. This report provides 20 recommendations as to how LEAs can plan more comprehensively for the needs of all students, but particularly students with unique needs. The recommendations include:

1. Engage in more targeted outreach to students and families, particularly reaching out to student groups representing vulnerable populations and families of students with unique needs, during the stakeholder engagement process;

2. Ensure students with unique needs receive priority access to additional learning time and in-person individual or small cohort instruction;

3. Include greater detail in the plan on the services provided to students in foster care, English learners, students experiencing homelessness and students in the juvenile justice system, including how those services will support the specific challenges they face;

4. Integrate mental health promotion, social-emotional learning, and trauma-informed practices into the classroom environment, and ensure professional development opportunities for school staff will help embed and sustain supportive, trauma-informed practices in and outside of the classroom;

5. Provide greater detail in the plan about specific assessments to measure learning loss, including considerations for specific student groups, and share more meaningful information about how the LEA will measure the effectiveness of its learning loss mitigation strategies;

6. Utilize diagnostic tools such as assessments, surveys or attendance data, disaggregated by student group, to identify and prioritize subgroups that have experienced learning loss, including for delivery of learning loss mitigation strategies and small cohort in-person instruction;

7. Significantly improve transparency around planned and actual LEA expenditures, including but not limited to providing specific information about the funding sources for investments listed in their budget planning documents, including Learning Continuity Plans, LCAPs, and Expanded Learning Opportunities Grant plans. LEAs should include clear tables and appendices in in their 2021 Annual Update, and upcoming LCAP and Annual Update for 2021-22, explaining how they used or will use their federal relief funds and Local Control Funding Formula ("LCFF") supplemental and concentration dollars, whether or not they provided that detail in their Learning Continuity Plans; and

8. Improve LEA understanding of how to demonstrate increased and improved services to certain students with unique needs, pursuant to their proportionality obligation under law.

Following these recommendations will help LEAs to meet their equity obligations to students and families, strengthen their engagement of key stakeholders, bolster the services and supports they provide to students with unique needs, and improve transparency around public education funding during and in the aftermath of this public health crisis.

Introduction

Young people in California have experienced unprecedented upheaval in their lives due to the global COVID-19 pandemic. Since March 2020, when school buildings in California physically closed in response to increasing infection rates, students have been contending with varying levels of distance learning and hybrid in-person/distance instruction. For most students, this has been an entirely new and difficult way to learn. And for "students with unique needs" – students in foster care, students in the juvenile justice system, students experiencing homelessness, English learners, students in low-income families, students of color, and students with disabilities – these challenging forms of instruction have only compounded the typical barriers to graduation that they face, such as higher-than-average school mobility, lack of access to mental health and special education services, and discriminatory school climates.

The COVID-19 pandemic is not yet behind us. While vaccination levels increase and local districts and labor unions negotiate proposals on how to fully reopen schools, LEAs must still plan for multiple modes of instruction – distance, hybrid, and in-person. To that end, as LEAs and community stakeholders engage in 2021-22 planning, it is important to amplify successful practices – and avoid concerning practices – from the 2020-21 school year. This report examines what we can learn from the Learning Continuity and Attendance Plans ("Learning Continuity Plans") that LEAs completed in Fall 2020.

In typical years, as part of California's Local Control Funding Formula ("LCFF") accountability framework, local education agencies ("LEAs"), including school districts, county offices of education and charter schools, must submit Local Control and Accountability Plans ("LCAPs") to explain to stakeholders how they are serving students. Due to the COVID-19 pandemic and resulting school closures, state leadership waived the requirement that LEAs adopt an LCAP in 2020. Instead, LEAs were required to develop and adopt a 2020-21 Learning Continuity Plan by September 30, 2020, to describe how LEAs would address student learning during the pandemic.[1]

LEAs were asked to describe, at minimum, the following components in their Learning Continuity Plan:

✓ How they engaged stakeholders in the development of the Learning Continuity Plan;

✓ Their plan for providing safe in-person learning opportunities;

✓ Their plan for ensuring all students have the devices and connectivity necessary to fully engage in distance learning;

✓ How they would measure student participation and progress during distance learning;

✓ Additional supports they would provide to students with unique needs, including English learners, students in foster care, students experiencing homelessness, and students with exceptional needs served across the full continuum of placements;

✓ Actions and strategies to address "learning loss" and accelerate learning progress, and how these strategies would differ for English learners, students in low-income families, students in foster care, students experiencing homelessness, and pupils with exceptional needs (students with disabilities);[2]

✓ Resources and supports to address student and staff mental health and social-emotional well-being;

✓ Their strategies for student and family engagement and outreach; and

✓ How they would increase or improve services in proportion to the supplemental and concentration grant funds they received for unduplicated student groups, comprised of students in foster care, English learners, and students in low-income families.

We analyzed 48 Learning Continuity Plans to learn about promising and concerning practices and trends in LEA planning. Because Learning Continuity Plans are planning documents adopted at the beginning of the school year, they did not explain whether and how well districts actually delivered services and supports that they planned. We not only reviewed these plans for minimum legal compliance, but also to gain perspective on how comprehensive and innovative district planning was with respect to critical concerns of community stakeholders. We share our findings in this report.

Methodology

We collectively reviewed Learning Continuity Plans from 48 LEAs across California. LEAs were selected primarily based on their percentage of unduplicated students (students eligible to receive free and reduced-price meals, English learners, and students in foster care) and/or their relatively high enrollment of other students with unique needs, such as students experiencing homelessness and students in the juvenile justice system. We also attempted to include LEAs of varying sizes and from different regions in the state. Several of the LEAs we included have ongoing collaborations with the organizations that authored this report. See Appendix I for a list of all the districts we reviewed.

Each Learning Continuity Plan was read in full and analyzed by one reviewer, using a standardized rubric co-developed by all organizations that authored this report. Most reviewers read more than one Learning Continuity Plan. Aside from analyzing the Learning Continuity Plans qualitatively, we also collected quantitative information, such as the largest budgeted expenditures, and compared the LEA's total revenue to the amount budgeted in their Learning Continuity Plan. See Appendix II for the questions in our standardized rubric.

Using our standardized rubric, we evaluated if LEAs met the basic requirements and expectations of the Learning Continuity Plan and identified bright spots where LEAs planned to implement promising practices that go beyond the basic requirements.

Trends and Practices in Learning Continuity Plans

Below are trends we saw in these Learning Continuity Plans, as well as practices we identified as concerning or promising, based on state-mandated and community expectations for how LEAs should have planned to support students during the 2020-21 school year. Aside from diving deeply into plans LEAs made to support students with unique needs, we examined how LEAs engaged with the community, planned for professional development, considered student technology and connectivity needs, addressed methods of instruction and learning loss mitigation, and more.

LEAs typically addressed the basic requirements overall, albeit with a low level of detail. However, some LEAs failed to address information they were required to include under law, or they did not meet our expectations for planning that would meaningfully support students with unique needs. For example, for each question in our rubric, at least one Learning Continuity Plan did not meet our expectations. Table 1 shows the five questions in our rubric for which Learning Continuity Plans were least likely to provide information that met our expectations.

Table 1. Five Rubric Questions with Lowest Percent of Learning Continuity Plans Meeting Expectations

Question	Percent of Plans Meeting Expectations
How will the LEA address lost instructional time due to inadequate or no internet connectivity during distance or hybrid learning?	31%
How will the LEA provide support to students who do not have a suitable learning environment at home?	35%
How will the LEA monitor staff's engagement with professional development?	40%

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

6

How will the LEA assess student device and internet access, strength, and reliability of connection as part of its re-engagement protocols?	44%
How will the LEA make staffing changes or additions to support the needs of students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities)?	65%

However, several LEAs included thoughtful, thorough planning, which we highlight below. While we designate these as "promising practices," we did not determine whether LEAs actually followed through with the promising plans they described. We encourage interested readers to reach out directly to districts with promising practices to learn more about their implementation process.

1. Stakeholder Input and Community Engagement

Expectations: LEAs were required to consult separately with the district English Learner Advisory Committee ("DELAC") and LCAP Parent Advisory Committee ("PAC") and provide written responses to their feedback.[3] We expected LEAs to include this information in their Learning Continuity Plans because they were required to describe how they reached out to relevant stakeholders. They also had to provide clear, specific information about how the entire process of stakeholder engagement influenced the development of their Learning Continuity Plan.[4]

Trends: Overall, Learning Continuity Plans contained a disappointing level of information on this topic. Even though stakeholder input was a requirement, about 1 in 3 LEAs did not even mention consulting their DELAC and PAC, and only a handful clearly identified that they provided written feedback to both groups. LEAs commonly used surveys of parents and staff to seek feedback on and guide Learning Continuity Plan development. However, even if it was clear that feedback was provided, most LEAs did not identify how the Learning Continuity Plan was adjusted to incorporate feedback.

Practices: It was promising that a few LEAs clearly identified how stakeholder feedback was implemented in the Learning Continuity Plan. For example, **Los Angeles Unified ("LAUSD")** featured a crosswalk that described the influence that DELAC and PAC feedback had on the Learning Continuity Plan, the actions/services planned as a result, and where in the plan readers could find this information.

> *Pomona Unified clearly identified specific examples of services and supports incorporated as a result of stakeholder feedback and tied it directly to the feedback the LEA received.*

Some LEAs consulted specifically with student groups and individual students. For example, **LAUSD** worked to organize student focus groups to obtain feedback, including English learners, students in foster care, and youth from InnerCity Struggle, a community-based organization in Los Angeles.

2. Students with Unique Needs

Given the deep inequities magnified by pandemic learning and the obligation of LEAs to address disparities, we examined how comprehensively LEAs addressed students with unique needs in their Learning Continuity Plans.

In addition to the qualitative analysis of trends described in more detail below, we tracked how often Learning Continuity Plans addressed the needs of particular student groups.[5] We noted when Learning Continuity Plans mentioned parents/guardians or addressed any of the following student groups: students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities.

As shown in Figure 1, students who are English learners were named most frequently throughout the Learning Continuity Plans — in over half (53%) of the plans' sections — compared to all other student groups we tracked. In contrast, very few sections explicitly addressed the needs of Black students (6%) or other students of color (2%).

About one fifth (19%) of sections throughout the Learning Continuity Plans we reviewed did not mention parents/guardians or any of the student groups listed above.

Figure 1. Percent of Learning Continuity Plan Sections in Which Student Groups and Stakeholders Were Named
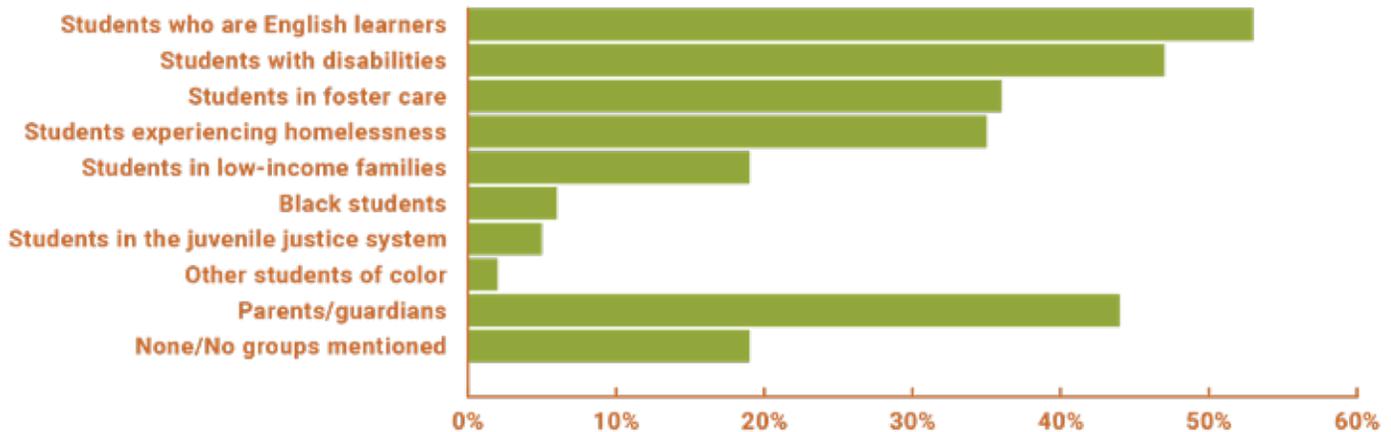
Not surprisingly, Learning Continuity Plans were most likely to discuss the needs of students who are English learners, students with disabilities, students in foster care, and students experiencing homelessness in the section on "Supports for Pupils with Unique Needs," where these groups were specifically listed in the Learning Continuity Plan template prompt.

Expectations: First, LEAs were required to describe the additional support they would provide during distance learning to students with unique needs.[6] Additionally, we expected LEAs to describe professional development topics that touched on the needs of students with unique needs, and to address how they would mitigate learning loss for these students and reengage them in learning, if needed.

a. English Learners

Trends: In meeting the needs of English learners, LEAs are required to provide English learners with designated and integrated English language development ("ELD"). While almost all LEAs mentioned ELD, they lacked specific strategies about how this would be provided. For example, Learning Continuity Plans did not typically include details about: any guaranteed synchronous instructional time for ELD that would be provided for English learners; how professional development for all educators would incorporate ELD strategies (for both teachers of English learners and teachers in other subjects); monitoring of progress and assessments with specific interventions for the different typologies of English learners; and instructional materials that would be provided to support language development. While most LEAs mentioned one or two of these specific areas, it is important that LEAs plan for *all* of these strategies in order for English learners to have access to the education that they deserve.

Moreover, when additional learning time or in-person learning was mentioned, most LEAs did not explicitly discuss if English learners would be prioritized for these opportunities, raising serious equity concerns for these students.

Practices: There were several promising practices worth highlighting.

> ***Mendota Unified*** assigned specific counselors to newcomer students at the secondary level to provide a more personalized introduction to the district and academic counseling.

Anaheim Elementary School District offered an Emergent Bilingual Academy after school for students in grades 4-6 identified by the state last year as at risk of becoming Long-Term English Learners (LTEL). Finally, **Antelope Valley Union High School District** included a subsection specific to "dually identified English learners in special education." This is important as many English learners at the secondary level have this dual identification and require tailored supports.

b. Students in Foster Care

Trends: Most LEAs described the services and supports they planned to provide to students in foster care during distance learning, but did not always specify if the services were tailored to meet students' needs during the pandemic or how they would ensure that all students in foster care received regular outreach from school staff to monitor and address their needs. At least 14 LEAs[7] planned to offer dedicated tutoring programs for students in foster care or gave them priority access to tutoring, counseling, social-emotional supports, and other academic supports like homework assistance and credit recovery opportunities. In addition, at least 11 LEAs[8] described collaboration with community-based organizations and/or the county child welfare agency to help ensure the needs of students in foster care are met during distance learning.

Practices: We identified several promising practices in the Learning Continuity Plans we reviewed. Related to academic supports, two LEAs partnered with local universities to provide tutoring for students in foster care: **Lancaster Elementary School District** partnered with UCLA and **Sacramento City Unified** partnered with CSU Sacramento. In addition, **Sacramento City Unified** planned to offer a summer program for credit recovery, with priority given to students in foster care and those experiencing homelessness. With regard to staffing, several LEAs described how existing staff or programs dedicated to serving students in foster care would pivot to providing services and supports in a virtual format (including **Fresno Unified, LAUSD, Pomona Unified, and San Bernardino City Unified**). Notably, **Oakland Unified** hired three new dedicated staff to monitor and address the needs of students in foster care during distance learning, including one staff person who works specifically with students in foster care who have Individualized Education Programs ("IEPs"). Finally, several LEAs described their plans to implement targeted outreach and reengagement strategies to connect with students in foster care during distance learning (e.g., **Calexico Unified, East Side Union High School District, Elk Grove Unified, Fresno Unified, LAUSD**, and **San Ysidro Elementary School District**).

> *In particular, **Elk Grove Unified** assigned a Foster Youth Services case manager to each student in foster care to monitor their well-being through bi-weekly phone or online meetings and help them access distance learning and other needed resources.*

However, we also identified concerning practices. Some LEAs provided insufficient information about services and supports for students in foster care or did not make clear if the supports they planned to provide were tailored to students' needs during distance learning. One Learning Continuity Plan did not mention students in foster care at all in the "students with unique needs" section, though it did address foster youth briefly in other sections. In addition, one Learning Continuity Plan stated that students in foster care "are entitled to remain in their same school whenever feasible," which does not accurately represent the right of students in foster care to stay in their school of origin after a placement change, unless their educational rights holder decides it is in the youth's best interest to transfer schools.

c. Students Experiencing Homelessness

Trends: Overall, only 18 of the LEAs mentioned support for students or families experiencing homelessness in their stakeholder engagement section. Furthermore, only 20 LEAs prioritized students experiencing homelessness for in-person learning opportunities. Ten LEAs[9] included targeted plans for students experiencing homelessness in their learning loss mitigation or reengagement sections. Most often, these plans included coordination efforts led by either the McKinney-Vento liaisons, attendance coordinators, or other site-based support staff. These strategies included offering individual online or in-person tutoring, teacher office hours, mentoring, homework help, after school or summer learning opportunities, targeted credit recovery, and socializing opportunities.

Practices: Two LEAs included promising plans for utilizing integrated and data-driven planning for students experiencing homelessness. **San Bernardino City Unified** identified a tiered re-engagement strategy that included a specific focus on effective and culturally relevant planning and instruction that promoted the diversity of their school community. Their plan highlighted the importance of school culture and its impact on establishing "early, positive relationships with vulnerable student groups," including students experiencing homelessness, as baseline strategies to prevent disengagement in the first place. **Salinas City Elementary School District** included plans for utilizing data from the formal district-wide assessment results, teacher informal observations, formative assessment results, and parent, student, and teacher feedback to measure the effectiveness of instructional loss mitigation strategies. In addition, **Salinas City Elementary School District** implemented data tools to disaggregate student groups and specifically monitor progress for students experiencing homelessness and foster youth. Finally, they described plans for accessing, analyzing and sharing those data with site-level and district administrators on a consistent basis.

During our review, we specifically tracked how LEAs planned to address continuity of learning and lost instructional time due to inadequate or no internet connectivity, or lack of a suitable learning environment in the home, given how housing instability disrupts students' ability to access technology and meaningfully engage in their education.

> *It was highly concerning to find that only 12 LEAs included specific plans aimed at addressing lost instructional time due to limited or loss of internet connectivity.*

d. Students with Disabilities

Expectations: In addition to the overarching expectations listed in the introduction of this section, LEAs also had to address in students' Individualized Education Programs ("IEP") how the IEP would be provided under emergency conditions, when instruction and/or services could not be delivered at school or in-person for more than ten days.[10] This information needed to be added to initial IEPs that the LEA developed after school closures began or at the next regularly scheduled IEP review meeting.

Trends: Many districts simply stated they would provide their students with disabilities with services and accommodations in their IEP, as required by existing federal and state law, without additional detail that would be helpful to community stakeholders. Unfortunately, it was also common for LEAs to stay virtually silent on other critical planning for students with disabilities. For example, very few LEAs added additional staff to support students with disabilities during distance learning. LEAs did not typically discuss reengagement strategies that were specific to students with disabilities who had disengaged from learning, instead implying that their general reengagement efforts would suffice despite these students' special learning needs. Finally, several LEAs did not include professional development topics on how to support students with disabilities in their list of trainings for teachers and staff.
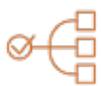
Practices: Despite the lack of detail and planning described above, we identified several promising practices in our review. Multiple LEAs, such as **Calexico Unified, San Diego County Office of Education**, and **West Contra Costa Unified**, decided to shift existing staff, such as paraeducators, to new roles so they could support students with disabilities to learn in the virtual setting or provide one-

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

10

on-one support. Other LEAs, such as **Antelope Valley Union High School District, Palmdale Elementary School District** and **Robla Elementary School District**, appeared to commit to developing new Distance Learning Plans without waiting for the next scheduled IEP revision meeting, which was above the minimum requirement under state law. Additionally, several LEAs – such as **East Side Union High School District, Eureka City Schools**, and **Moreno Valley Unified** – specifically named students with disabilities as a priority population to phase into in-person instruction as early as possible – an acknowledgment of the unique challenges these students may face with distance learning. **Calaveras Unified** appeared to offer in-person learning to students with disabilities at the time they published their Learning Continuity Plan.

> *Importantly, a few districts, such as **Anaheim Union High School District, Fontana Unified** and **Twin Rivers Unified**, hired new staff or contracted with third parties to ensure that needed special education-related assessments would be completed without delay.*

e. Students in the Juvenile Justice System

See "County Offices of Education" section below for information about this subgroup of students with unique needs.

3. Professional Development

Expectations: LEAs were required to describe the professional development and resources they would provide to staff to support the LEA's distance learning program. Additionally, we expected that LEAs would outline professional development plans that specifically related to the needs of at least some subgroups of students with unique needs. We also hoped LEAs would describe a plan to monitor whether staff engaged with professional development opportunities and to support staff with professional development over the entire school year, versus only at the beginning.

Trends: Almost all LEAs included language in their plans for professional learning that included references to English learners, students with disabilities, students in foster care, and students experiencing homelessness in some form. However, a significant number of LEAs (about one in three) omitted detail about how professional development plans for staff would benefit vulnerable student groups and instead provided a generic list of offerings available to staff. Plans often failed to describe how staff participation in professional learning would be tracked and how the effectiveness of such training would be measured, including its impact on practice. While many LEAs described professional development to prepare for distance learning, they failed to describe plans for ongoing staff engagement, as students' needs potentially changed. Two thirds of LEAs did not mention how they would monitor staff engagement, and one third did not articulate a plan for ongoing professional development opportunities over time. Finally, while nearly two thirds of LEAs did mention professional learning for school staff other than teachers, there were still too many LEAs that did not describe a plan for inclusive professional learning. In particular, the need to engage principals and other administrators as instructional leaders is critical.

Practices: We identified several promising professional development practices. **LAUSD** described extensive online professional learning supports for teachers in ELD and instruction in grades K-12, including dual language foundations for dual language learner students, instructional needs of newcomers, English learner instructional approaches and high impact practices, primary language instruction, reclassification and Redesignated Fluent English Proficient monitoring, using home language as a bridge to learning. **LAUSD** also described a master plan to coordinate instructional services for English learners that include monthly trainings. **Calexico Unified** mentioned professional development for staff on how to better support teachers. **Pomona Unified** planned to provide time and pay for substitutes to cover class so teachers could take time they needed for training and planning.

> *Finally, **Norwalk-La Mirada Unified** described weekly professional development opportunities and professional learning communities where teachers with similar goals could regularly meet to learn and adapt instructional processes.*

4. Technology and Connectivity

Expectations: LEAs were required to describe how they would ensure 1:1 access to devices and internet connectivity for all students to support distance learning – including students and families with unique circumstances.[11] LEAs were required to provide a device (laptop or tablet) or internet connection (usually by providing an wi-fi hotspot), free of charge, to students that did not have a device or sufficient internet connectivity.[12] We also expected LEAs to describe the intersection of connectivity and engagement – that is, how LEAs would identify and address situations in which connectivity challenges were disrupting students' ability to engage with instruction or otherwise fully participate in their education.

Trends: Almost all LEAs included plans for assessing access to technology devices or internet connectivity in their Learning Continuity Plans. These plans often included surveying students and families about their access to or need for technology and internet connectivity in order to participate in online learning platforms. If students lacked access to a device or internet connectivity, most LEAs at minimum planned to provide families with a device and at least one or multiple mobile internet devices per household, dependent upon the number of students in the home.

Practices: There were some promising practices revealed in LEA plans to support access to technology and internet connectivity. For example, both **Arvin Union** and **Fontana Unified** planned to provide multiple mobile internet hotspot devices for families with multiple students in one home, to combat the bandwidth limitations of devices. Relatedly, **Fontana Unified** included plans to collaborate with local internet providers to either provide in-home internet or expanded access in public areas. Additionally, to address lost instructional time due to disrupted internet connectivity, some LEAs planned to record live instruction and make it available for students to access at their leisure (e.g., **Alisal Union, Sacramento City Unified**, and **West Contra Costa Unified** at teachers' discretion). In planning for the needs of students with disabilities, LEAs such as **Sacramento City Unified** and **San Joaquin County Office of Education** noted in their Learning Continuity Plans that they had plans to ensure that students with IEPs had at-home access to devices and assistive technology as identified by their IEPs.

Although most LEAs provided 1:1 device access, at least one LEA identified a device shortage, and it did not anticipate receiving the additional devices until mid-semester. One LEA did not ensure that every student had access to a device (e.g., this LEA mentioned providing devices for students in grades 3-12 but not students in K-2), and it was concerning to see few LEAs mention how they would provide technology support, including troubleshooting for devices and internet connectivity. Some LEAs included policies that required parents or guardians to sign out devices and would not allow students to sign out a device, which would potentially create challenges for students not living with a parent or guardian, working parents, or parents without transportation or childcare. Most concerning in the review was the lack of recognition or planning from most districts about how they would address lost instructional time for students who live in internet dead zones, those that frequently experience a temporary loss of internet connectivity, or those with insufficient bandwidth to enable participation in classes offered through online meeting platforms or to reliably access online learning.

5. Additional Staffing and Support

Expectations: We expected LEAs to describe staffing changes or additions to support at least some subgroups of students with unique needs.

Trends: In this section, many Learning Continuity Plans provided general information about LEAs' plans to shift staff roles and responsibilities or hire additional staff to support students during distance learning, though their plans were not specific to students with unique needs. For example, several LEAs

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

12

– such as **Long Beach Unified, Lucerne Elementary School District** and **West Contra Costa Unified** – hired new staff to support students and staff with social-emotional learning during distance learning, and **Kern County Office of Education** hired a Multi-Tiered System of Supports Coordinator. In addition, some LEAs – such as **Robla Elementary School District** and **Eureka City Schools** – repurposed their classified staff to assist classroom teachers during live online instruction or breakout rooms and to provide small group instructional support. **East Side Union High School District** reassigned staff to help with attendance and engagement efforts, including reaching out to students who are disengaged or who have been absent from online instruction. Specific to students with unique needs, many Learning Continuity Plans discussed plans to use their existing staff who serve certain high-need student groups (students with disabilities, students in foster care, students experiencing homelessness, and English learners) to reach out and provide supports to these students in a virtual format.

> *Unfortunately, over one third of Learning Continuity Plans we reviewed did not include any information on staffing changes or additions to serve any students with unique needs, or simply stated that staffing did not change.*

Practices: We identified several promising practices in this area. **Antelope Valley Union High School District** and **Twin Rivers Unified** each hired two additional staff to support the needs of their English learners. **Oakland Unified** hired three new dedicated staff to help monitor and address the needs of students in foster care during distance learning, one of whom works specifically with students who are in foster care who have IEPs. **Calexico Unified** paired up students in foster care or experiencing homelessness with an Expanded Learning staff person to tutor and mentor these students, provide them with supports, and connect them to resources. Finally, **Robla Elementary School District** hired one social worker to provide supports to students and families impacted by COVID-19, including students in foster care, English learners, and students in low-income families.

6. County Offices of Education

Expectations: County Offices of Education ("COEs") maintain alternative education programs, such as court and county community schools. While Learning Continuity Plans were not required by law to include any particular information about alternative schools, the state did require that LEAs address additional supports for[13] and strategies to address instructional loss[14] of "pupils in foster care," which encompasses students in the juvenile justice system. Since students in the juvenile justice system are the sole students in COE court schools and frequently attend county community schools, we examined these COEs' Learning Continuity Plans not only in terms of their services for all students, but also with a specific eye toward their supports for students in the juvenile justice system.

Trends: Several COEs provided limited or no information on the synchronous and asynchronous instructional minutes they would offer to their students, making it unclear as to whether the COEs would be in compliance with state law. Additionally, a common thread was that COEs shared little specific information about how incarcerated youth in their court schools received instruction during the pandemic that was unique to those students' circumstances. For example, incarcerated youth can be held in quarantine in their cells or units if COVID-19 cases arise in the juvenile detention facility, but COEs neither acknowledged that scenario nor provided information about how education would be provided to youth in those situations. Additionally, some COEs specifically acknowledged that incarcerated youth would have limited access to technology for distance learning, without providing strategies for how this could be addressed. Overall, it was striking to see so little information about education supports for incarcerated youth in contrast to the plans these COEs made for their students in COE community schools and other county education settings.

Practices: Several COEs shared information that was promising. For example, **Kern County Office of Education** and **Orange County Department of Education** described a long stakeholder engagement process and detailed how that input was specifically integrated into their Learning Continuity Plans. With regard to student connection, **Kern**, **Monterey** and **San Francisco COEs** utilized creative engagement practices such as transition counselors, weekly engagement logs and family phone checks to support their students in staying connected to school. Finally, COEs including **Monterey, San Diego, San Francisco** and **San Joaquin COEs** offered professional development opportunities for teachers and staff that specifically addressed mental health and trauma, and planned new supports to help students learn about and address their mental health.

We identified a number of concerning practices in addition to the lack of attention to incarcerated youth described as a trend above. COEs described punitive responses to student disengagement from learning, such as referring students to their probation officers, to the District Attorney's office, or to staff that appeared to be in a law enforcement role. One COE acknowledged they would use monitoring software to oversee detained youth's internet usage, which raises significant student privacy concerns. These punitive approaches stand in contrast to non-COE LEAs, who focused on a multi-tiered system of engagement that, generally, did not include surveillance, law enforcement referral or prosecution.

## 7. Mental Health and Social and Emotional Well-being

Expectations: LEAs were required to describe how they would monitor the social and emotional well-being of students and staff during the school year.[15] They also had to generally describe how they would provide students and families with information, resources, supports and referrals to services.[16] Additionally, we expected that LEAs would address how they planned to utilize trauma-informed practices, peer-to-peer connection and social-emotional learning in the classroom.

Trends: Overall, the Learning Continuity Plans we reviewed met basic expectations with respect to how LEAs planned to provide students and families with mental health information, resources, supports and connections to outside mental health services. However, on average, the Learning Continuity Plans included limited or no information on how trauma-informed practices, peer-to-peer connections and social-emotional learning would be utilized in the classroom.

Eleven of the Learning Continuity Plans contained no mention of any of the specific student groups or stakeholders we reviewed for in the mental health and wellness section. See Students with Unique Needs section on page 7 for more detail about our analysis of student and stakeholder groups named throughout the Learning Continuity Plans. This indicated that some LEAs may not have planned for any unique mental health and wellness supports tailored to the circumstances of students with unique needs.
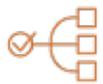
Practices: We identified several promising practices in the Learning Continuity Plans. Some LEAs included concrete plans for identification of student mental health needs, such as through virtual emotional wellness checks (**Fresno Unified**) or ongoing screenings and surveys (**Twin Rivers Unified** and **Santa Ana Unified**). LEAs described a range of school-based services (e.g., site-based psychologists providing case management, individual and group counseling and outside referrals), as well as collaborations with outside partners (including county behavioral health agencies, community organizations, and at least one university-based trauma center) for meeting mental health and related needs (e.g., **Long Beach Unified, Monterey County Office of Education, Moreno Valley Unified, Norwalk-La Mirada Unified**, and **Palmdale Elementary School District**). Some LEAs specifically recognized the need for multiple tiers/levels of support (e.g., **East Side Union High School District** and **Monterey Peninsula Unified**).

Anaheim Elementary School District, Anaheim Union High School District, and **East Side Union High School District** described bringing mental health and wellness into the classroom through lessons or educational series. **Long Beach Unified** described having "teachers on special assignment" to staff its work on social and emotional learning, while **West Contra Costa Unified** noted creation of a new position, Director of Positive School Climate and Social Emotional Learning. **Stockton Unified** described partnering with a program that uses trained student leaders to help evaluate school connections and emotional climates, and using restorative circles to promote peer connections. Finally, some LEAs addressed how they would meet the needs of more impacted groups of students, such as Black students impacted socially and emotionally by current events (**West Contra Costa Unified**) and LGBTQ+ students (**Sacramento City Unified**).

We also identified concerns in some of the Learning Continuity Plans, such as insufficient information regarding how the needs of students and staff would be identified, access to counselors, how students and families would be connected or referred to outside resources when needed, and remote service delivery.

> *Several LEAs identified probation officers as a resource for students experiencing stress or trauma, which is concerning for multiple reasons, including because of the lack of standardized or required mental health training for probation officers.*

Some LEAs made vague references to the use of multi-tiered systems of support, and to the use of screenings and assessments, without offering meaningful detail. Finally, some LEAs lacked information about how they would measure the effectiveness of their mental health and wellness supports.

8. Professional Development Related to Mental Health

Expectations: LEAs had to describe what professional development they would provide to staff on the topics of mental health needs and social-emotional learning.[17]

Trends: Most Learning Continuity Plans included the minimum required information on this topic. However, some LEAs provided no information, or insufficient information, about the specifics of the professional development provided, timeline for implementation of professional development, who would provide the trainings, and who would have access to the trainings. Many Learning Continuity Plans also lacked information about monitoring or accountability to track participation and engagement in professional learning related to mental health. In addition, many Learning Continuity Plans did not reference important topics such as equity, cultural responsiveness, racial justice or anti-racism in their discussion of professional learning related to mental health.

Practices: We identified several promising practices in the Learning Continuity Plans. Some LEAs offered professional development opportunities on a wide range of mental health topics, such as: Adverse Childhood Experiences ("ACEs"), mental health first aid, trauma-informed practices/trauma-sensitive schools, secondary trauma, social-emotional learning ("SEL") embedded instruction, training on implementation of SEL curricula in a virtual environment, mental health awareness/supports, grief/loss, motivation, coping skills, anxiety/depression, training specific to unsafe living conditions, stress management, trauma and discipline, resilience, culturally responsive teaching, restorative practices, mindfulness, helping students build supportive connections to adults, and the "combined traumas" of COVID-19 and ongoing systemic racism and racial violence. **Oakland Unified** offered trainings specifically addressing equity and racial justice issues, such as "Healing Centered Restorative Justice" and "Building Relationship Centered Schools to Address Racism and Bias," and **San Francisco County Office of Education** discussed using "Anti-Racist Healing Practices" to support the wellness of students, families, and staff. The **Monterey County Office of Education** described training for Alternative Education staff on trauma-informed practices to differentiate between stress, chronic stress, trauma, and anxiety in order to determine appropriate interventions. Additionally, there were several LEAs that addressed professional development for all their staff, not just teachers or administrators.

9. Learning Loss, Including Assessments

Expectations: LEAs had to describe how, with which tools, and at what frequency they would assess learning status (including instructional loss), particularly in the areas of English language arts, English language development, and math.[18] They also had to describe how they would use supports to address the needs of students not performing at grade level.[19] Finally, we expected LEAs would provide stakeholders with sufficient information to understand how learning loss and/or inadequate student progress they identified would trigger interventions for students.

Trends: In the descriptions for how LEAs would measure learning loss, too many were vague and relied heavily on assessment systems that are very focused on standardized summative tests (I-Ready, Northwest Evaluation Association). Few LEAs focused on formative assessments or described how student progress would be measured on an ongoing basis, which should be the main focus in order to inform instruction and ensure that the strategies utilized are more responsive to student needs.

> *Additionally, few LEAs described how they would actually measure the effectiveness of their intervention strategies.*

However, one positive trend was that many LEAs placed additional focus on students with disabilities and English learners for assessment purposes.
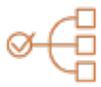
Practices: We identified several promising practices. **Long Beach Unified** described the use of CORE data[20] to better inform interventions and measure instructional loss. **Fresno Unified** provided mentors to support Long Term English Learner students. **Elk Grove Unified** implemented a plan for credit recovery. **Oak Grove Unified** described a comprehensive approach, including parent training, summer STEAM academy, and professional learning communities to review student-level data. **San Francisco Unified** planned to compare interim data to previous years to assess learning loss.

10. Mode of Instruction

Expectations: As part of the move to distance learning, the June 2020 education budget bill, SB 98, mandated that LEAs offer minimum instructional minutes each day.[21] Instructional minutes mandated by SB 98 are as follows: Pre-K and kindergarten = 180 instructional minutes; grades 1-3 = 230 instructional minutes; and grades 4-12 = 240 instructional minutes. It is important to note that SB 98 did not set specific minimums for synchronous versus asynchronous minutes. However, we expected LEAs to describe daily instructional minutes for both asynchronous instruction (instruction through means other than live instruction) and synchronous instruction (instruction provided in real-time by a teacher), because of the importance of this distinction to students and their families. We also hoped LEAs would plan an attendance policy for both types of instruction and address how it would assess engagement – not just attendance – in both settings.

Trends: Only 36 LEAs included any mention of instructional minutes in their Learning Continuity Plans. Of the LEAs that did address instructional time, only 23 LEAs provided a distinction between asynchronous instructional minutes and synchronous instructional minutes that students would receive daily. In comparison to the statutorily required (prior to the pandemic) in-person instructional time of 200 to 360 minutes per day, 23 LEAs distinguished between modes of instruction and planned to provide a wide range of synchronous instructional minutes, as follows:

- 60 minutes to 180 minutes per day for PreK - K
- 75 minutes to 240 minutes per day for Grades 1 - 5
- 75 minutes to 300 minutes per day for middle school
- 75 minutes to 360 minutes per day for high school

Practices: Most promising were LEAs such as **Calaveras Unified** and **Salinas City Elementary School District** that included sample school day schedules, with plans for live instruction, office hours style drop-in time and designated small group or 1-on-1 instruction for students that needed targeted interventions. Additionally, **Monterey Peninsula Unified** planned how school site staff would track and document student level engagement in both asynchronous and synchronous instructional activities, and further detailed how

those data would be used to aid family engagement strategies. However, in addition to the 12 LEAs that did not include plans for instructional time, it was concerning that some Learning Continuity Plans suggested instructional times in the plans were general guidelines and did not create a mandated minimum level. While we recognize the need to develop plans according to the needs of specific school communities, this lack of an LEA-level mandate could result in large inconsistencies in access to live instruction within an LEA.

11. In-Person Instruction

Expectations: We expected that LEAs would address actions to plan for in-person learning, whenever safely possible and to at least acknowledge their ability to prioritize students for in-person instruction in small cohorts, per guidance from the California Department of Public Health issued on August 25, 2020[22] and updated on September 4, 2020, prior to the due date for Learning Continuity Plans.[23]

Trends: During the development of the Learning Continuity Plans, it was not clear from state leadership when full scale in-person learning would be safe for all students, so it was not surprising that many LEAs outlined plans for working with or monitoring their local department of health for approval to move back to in-person learning. At least 40 Learning Continuity Plans we reviewed included plans for returning to in-person instruction or identifying priority student groups for small cohort learning opportunities, although many of the LEAs did not specify which groups would be prioritized for those in-person opportunities. LEAs that addressed in-person learning often included plans for collaborating with local health departments on developing safe returns to in-person learning, purchasing of personal protective equipment, and plans for monitoring traffic flows on campus and smaller-than-normal class sizes. Some LEAs included plans for utilizing hybrid learning and A/B student group schedules.

Practices: Despite the minimal information included in most Learning Continuity Plans, some promising practices emerged. For example, LEAs such as **Eureka City Schools** and **San Joaquin COE** clearly identified their use of diagnostic assessments to determine which students to prioritize for in-person learning.

> *Moreno Valley Unified, Oakland Unified, and San Francisco Unified included plans to proactively utilize data, such as chronic absenteeism tickers or low online engagement tickers, as a way to prioritize outreach to students for in-person learning opportunities.*

12. Addressing Needs of Students Without a Suitable Place for Learning

Expectations: We expected LEAs to acknowledge that not all students have a suitable learning environment at home. We hoped for details on how they would address that challenge, for example, by collaborating with community organizations to provide and supervise physical spaces where students could learn, or paying for transportation to such physical spaces.

Trends: It is concerning that the majority of LEAs did not address this issue and those that did generally lacked plans for specific interventions. Of the LEAs that addressed this issue, many focused on providing additional supports for students experiencing homelessness, students with disabilities, and students in low-income families. While most plans lacked specific details, some LEAs planned for provision of assistive technology and other devices to support students with disabilities.

Practices: We identified a number of promising practices, despite the overall gap in information on this topic. **Calaveras Unified** provided "distance learning rooms or Internet cafes" at school sites for students living in rural areas without internet access. Students could visit these locations to access instruction time on a device, and it appears that devices and transportation would be provided.

> *Fontana Unified provided three "Learning Centers" to, in part, support students experiencing homelessness who did not have suitable learning environments.*

San Joaquin COE outlined how it would support students receiving special education services by providing all families with adaptive devices, communication aids, equipment, and other tools to recreate the in-person learning environment. In addition, **Alisal Union** planned to purchase desks and chairs for students who need workspaces at home, such as students in low-income families, students in foster care, students experiencing homelessness, and students who are English learners. Finally, **East Side Union High School District, Fresno Unified, Long Beach Unified**, and **Oakland Unified** also included plans for either providing supervised in-person learning or partnering with local community-based providers to provide supervised in-person space for students.

Fiscal Analysis of Learning Continuity Plans

Introduction

Given the suspension of the more comprehensive Local Control and Accountability Plan ("LCAP") during the 2020-21 school year due to the pandemic, the Learning Continuity Plan is the sole LEA-wide plan for the current fiscal year that describes LEA spending in connection to programmatic priorities. Perhaps due to the lax format for reporting expenditures and lack of clarity about what spending must be included, we found that these Learning Continuity Plans did a poor job of clearly showing how LEAs invested the more than $8 billion in pandemic relief funding they received, in addition to billions in ongoing state funding, including Supplemental and Concentration ("S&C") funds generated by students in foster care, students in low-income families, and English learners ("high-need students"). As a result, it is extremely difficult for community stakeholders, especially students and families, to monitor and weigh in on the effectiveness of this spending and contribute to decision making. This difficulty is compounded by the fact that the 2021 Annual Update only requires reporting on expenditures included in the Learning Continuity Plan.

To provide at least some transparency about the fiscal planning completed by the 48 LEAs reviewed here, we describe below our analysis of three issues: (a) LEA budget transparency; (b) largest investments described across LEAs; and (c) plans to increase and improve services for students in low-income families, students in foster care, and English learners.

Moving forward, there must be a stronger mechanism for public accountability of federal relief and ongoing LCFF funding. LCAPs should include the federal relief funds the LEA received, disaggregated by funding source. If money is received after the LCAP is adopted, LCAPs should be amended, an appendix should be added, or LEAs must be required to update their expenditure tables. For the most recent round of federal relief funds, including the 2020 Coronavirus Response and Relief Supplemental Appropriations Act ("CRRSA") and the 2021 American Rescue Plan Act ("ARPA") funds, and any future federal funds, it is critical that the state do more to require transparent reporting and effective spending.

1. Budget and Revenue Comparisons

Overview

Learning Continuity Plans required LEAs to describe how federal and state funding included in the adopted budget "is used to support the efforts described in the [Learning Continuity Plan], including federal and state funds provided for learning loss mitigation."[24] We would thus expect Learning Continuity Plans to include expenditures of federal Elementary and Secondary School Emergency Relief ("ESSER") funds, Learning Loss Mitigation funds, and California's Local Control Funding Formula ("LCFF") funds, as well as any other resources supporting Learning Continuity Plan actions.

Findings

We analyzed fiscal transparency with respect to the 2020-21 amounts budgeted across the 48 Learning Continuity Plans, compared to those LEAs' actual revenue, and identified the following trends:

- As shown in [Figure 2](#), a majority of the 48 LEAs reviewed showed one quarter or less of their total projected revenue in their Learning Continuity Plans, and 91% of LEAs reviewed showed less than half of their projected revenue. This suggests that either the actions to support continuity of learning for students reflect just a sliver of what many LEAs are funding in the current year or many LEAs were

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

18

underinclusive in their reporting of actions in the Learning Continuity Plan. Either scenario highlights a troubling transparency gap when it comes to how LEAs spent the majority of their significantly increased budgets due to the influx of federal relief funds. Because LEAs will only be required to report on actions and services included in the Learning Continuity Plan in the upcoming Learning Continuity Plan Annual Update, there is little accountability to the community for the vast majority of funding that LEAs received in the current year. See Appendix V for the largest planned expenditures by LEA and additional fiscal data.

Figure 2. Percent of Total Projected Revenue Districts Budgeted in Their Learning Continuity Plan[25]
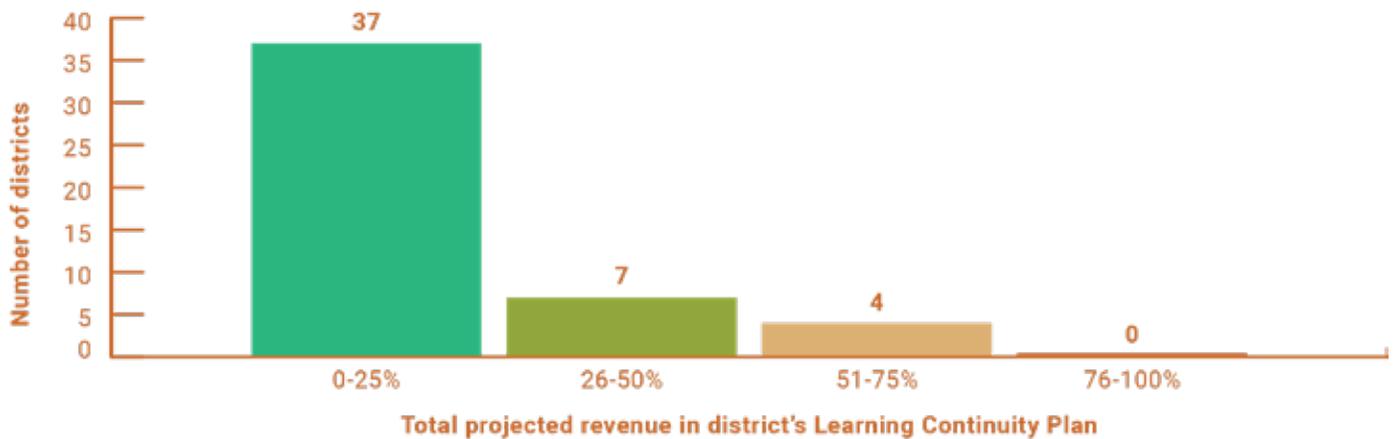
- Although Learning Continuity Plans must include federal and state funds provided for learning loss mitigation, 73% of LEAs adopted Learning Continuity Plans with budgeted expenditures in amounts less than the total amount of their Learning Loss Mitigation funds ("LLMF"), while 42% of LEAs budgeted less than half of the total amount of LLMF they received. Because the Learning Continuity Plan did not require LEAs to list funding sources, we have no way of knowing for sure whether LLMF revenues are reflected in the Learning Continuity Plans. While we cannot be certain that funds in Learning Continuity Plans are the LLMF, at the very least, one would expect Learning Continuity Plans to allocate funds nearly equivalent to what LEAs received to address instructional loss or at least explain why those funds are not included.

> *There is a troubling lack of transparency as to how LEAs are spending Supplemental and Concentration funds generated by high-need students to meet their needs in the current 2020-21 fiscal year.*

- Because the Learning Continuity Plan did not require LEAs to disaggregate by funding source actions marked as "contributing" to increased and improved services for high-need students, it is impossible to know whether actions LEAs marked as "contributing" account for S&C funds or include other funding sources.[26] If one assumes that Learning Continuity Plan expenditures marked as "contributing" do account for S&C funds, then LEAs varied greatly in how much of their appropriated S&C funds they included in their Learning Continuity Plans, ranging from 1% to more than 200%,[27] with 11 LEAs including 25% or less of their S&C funds while 11 LEAs included greater than 100% of their S&C funds (raising questions about whether those LEAs are properly characterizing their "contributing" services).[28] Because the only 2020-21 expenditures LEAs will be required to report on in the Annual Update are those expenditures in the Learning Continuity Plan, there is a glaring lack of oversight around appropriate S&C spending and effectiveness of actions for high-need students in the current fiscal year.

- Finally, there were numerous discrepancies between the amount of Learning Continuity Plan spending for increased and improved services for high-need students reported in the LCFF Budget Overview for Parents ("Budget Overview for Parents") versus the actual expenditures marked as "contributing" to such services in the adopted Learning Continuity Plan, although one would expect those two figures to be nearly identical. Twenty-three of the LEAs had a difference of $100,000 or more between the amount reported in their Budget Overview for Parents and their Learning Continuity Plan spending for high-need students, with 16 LEAs exhibiting discrepancies of greater than $1,000,000 (ranging from -$79 million to +$112 million).

Recommendations

Regardless of the amount of financial resources available, accountability is essential to ensure the community can transparently see how funds are being spent and how LEAs are reflecting on whether investments effectively serve students. The state should require LEAs to remedy these transparency gaps – specifically, by providing a table in their Annual Update to report on the spending of all Learning Loss Mitigation funds and other federal COVID-relief funds (whether or not they were included in their Learning Continuity Plans). Any future planning documents (e.g., for reopening or expanded learning plans) should include expenditure tables that require LEAs to identify funding sources. Likewise, LCAPs should reflect planned investment of all federal relief funds, also disaggregated by funding sources. If funds are allocated after the LCAP is adopted, LCAPs should be amended, with an appendix added, or LEAs should be required to update their expenditure tables. Next year's Budget Overview for Parents should require LEAs to report how one-time COVID-relief funds are being used and whether those funds are included in the LCAP.

Additionally, to facilitate fiscal transparency and understanding of whether LEAs met their legal obligation to increase or improve services for high-need students, LEAs should provide action and expenditure tables as an appendix in their Annual Update for the full amount of S&C funding received and provide funding sources for all actions in the Learning Continuity Plan, including those marked as "contributing." Future plans should require disaggregation by fund source. In addition, greater attention should be paid to oversight of the Budget Overview for Parents so that it may serve as a reliable and accurate tool for the community.

2. Largest Learning Continuity Plan Investments

Overview

We reviewed the Learning Continuity Plans to evaluate LEAs' largest planned investments. As used here, "largest investments" refers to the three programs and services that accounted for the largest percentage of budgeted expenditures reported in each LEA's Learning Continuity Plan.[29]

Findings

Table 2. Largest Learning Continuity Plan Investment Categories and Total Amount Budgeted

Investment Categories[†]	Total amount budgeted for the largest 3 expenditure categories among all LEAs	Number of LEAs where this was one of their largest planned expenditures
Devices and connectivity	$250,500,681	32
Expanded learning and tutoring programs	$1,081,440,269	21
Teacher and personnel hiring and salary	$965,222,061	19
Health and safety procedures and equipment	$113,540,759	18
Mental health and social and emotional well-being support	$62,769,254	8
Professional development	$12,998,976	6
Parent and pupil engagement and outreach	$9,681,913	4
Instructional materials and supplies	$21,487,837	4
Nutrition	$35,819,648	4
Extracurricular and learning enrichment opportunities	$28,832,253	2
*Combined expenditures	$120,151,340	3

† See [Appendix IV](#) for descriptions of the investment categories.

Table 2 shows the categories in which LEAs planned to make the largest investments and the total amount budgeted in those categories among all LEAs. Across the 48 Learning Continuity Plans reviewed, the largest planned investments were in the following areas:

1. **Devices and Connectivity** - In 32 LEAs, investments in devices and connectivity, including providing students and teachers with access to Chromebooks and hotspots, retrofitting classroom technology, and implementing communication/messaging systems, ranked among the largest three expenditures included in their Learning Continuity Plan. Combined, these 32 LEAs budgeted approximately $250 million for devices and connectivity for students and staff.

2. **Expanded Learning Programs** - In 21 LEAs, planned investments in expanded learning and intervention programs, such as after-school and summer school programs, multi-tiered systems of supports, tutoring, learning loss mitigation and credit recovery programs, were one of the highest expenditures, making up more than $1 billion in total budgeted expenditures. This spending category includes the largest gross investment among all LEAs.

3. Two investments tied for third:

   a. **Teacher and Staff Salaries** - In 19 LEAs, salaries and hiring costs for teachers, paraprofessionals, certificated staff, learning aids and tutors, principals, and administrators accounted for one of the largest budgeted Learning Continuity Plan investments. Together, these LEAs spent nearly $1 billion on these types of personnel.

   b. **Health and Safety** - In 18 LEAs, investments in health and safety procedures and equipment made up one of the largest expenditures. Investments in this category included purchasing personal protective equipment ("PPE") and sanitization supplies, increasing custodial staff, conducting facilities maintenance (e.g., HVAC repairs/upgrades), and other protocols such as reconfiguring classrooms to distance students. These LEAs planned almost $114 million for health and safety.

We made the following additional findings:

First, and unsurprisingly, a majority of LEAs (32 out of 48) planned significant spending on devices and connectivity due to the shift to distance learning across the state. The June 2020 education budget bill, SB 98, tied LEA funding for 2020-21 to providing universal student access to a device and connectivity and required LEAs to include in their Learning Continuity Plans a plan to assess and provide all students with 1:1 technology to engage in distance learning. SB 820, the education budget trailer bill signed in September 2020, expanded the requirements further by including devices and connectivity as part of the definition of "instructional materials" in the Education Code. This change recognized that access to devices and connectivity is a permanent ongoing necessity for students that will continue after the pandemic and a return to in-person instruction.

At the onset of the pandemic, it was reported that 1 in 4 school-aged children in our state lacked access to the internet at home.[30] Given the number of students, not to mention staff, that still needed a device or internet connection at the time Learning Continuity Plans were adopted, it is reasonable that many LEAs devoted a substantial portion of their budgets to purchasing and distributing technology necessary for distance and hybrid learning.

Second, despite the significant trauma wrought by the pandemic, investments in mental health and social and emotional well-being supports and services were one of the largest Learning Continuity Plan expenditures for only 8 LEAs. This is alarming given the sky-rocketing rates of stress, anxiety, depression, suicidal ideation, and suicide attempts students are experiencing during the pandemic. While many LEAs described in their Learning Continuity Plans how they would monitor and support the mental health and social and emotional well-being of students and staff, just one sixth of the LEAs made mental health and wellness one of their largest investments.

Third, many of the health and safety expenditures described in the Learning Continuity Plans were predicated on the notion that the LEA would provide in-person instruction or other on-campus services during the 2020-21 school year. Yet, a majority of California schools remained physically closed from March 2020 through most of the 2020-21 school year.

Fourth, personnel expenditures approached or exceeded half of the overall Learning Continuity Plan budget in 9 of the 19 LEAs that invested heavily in teacher, administrator, and staff salaries. The salary and staffing expenditure descriptions in those LEAs' Learning Continuity Plans were frequently so vague, or included multiple expenditures

bundled together, that it was impossible to decipher exactly how they planned to use the budgeted funds or how such investments differed from their core program. For example, one LEA budgeted nearly $600 million for staffing expenditures combined into two actions. The descriptions for both were extremely general: "school level funds for site supports such as class size reduction teachers," "additional staff to implement strategies... to increase or improve services for low-income students, students in foster care, and English learners," and allocating funds "to provide more site-level flexibility and decision making for staffing and supports."

Fifth, many LEAs failed to differentiate staffing costs for specialized programs and services from base salaries. For example, one LEA budgeted just shy of $85 million for "salary only" for teachers engaged in distance learning instruction. The Learning Continuity Plan subsequently referenced this expenditure five additional times in the distance learning actions section providing a different explanation of the purpose each time, including information on synchronous and asynchronous instruction modalities, instructional minutes and schedules, parent outreach, staff meetings, and staff development.

Sixth, in several instances, Learning Continuity Plans grouped personnel costs together rather than identifying subgroups (e.g., distinguishing custodial vs. transportation staff vs. counselors vs. supplemental classroom aides vs. administrators). For example, in a single action, one LEA described a nearly $280 million expenditure as including "staffing and supports...for Pupils with Unique Needs," "additional teacher professional learning and classroom time to prepare for...distance learning," "additional assistant principal resources for professional learning and family engagement," "additional counselor time," "intervention coordinators to implement learning loss interventions," and "site staff to support re-engagement efforts."

Finally, we noted that smaller LEAs and COEs differed from larger LEAs in how they invested their budgets. A larger portion of smaller LEA and COEs' Learning Continuity Plan budgets were earmarked for parent and pupil engagement, professional development and mental health and social and emotional supports.

Recommendations

Our findings regarding LEAs' largest Learning Continuity Plan investments emphasize the need for LEAs to consider additional promising ways to plan for and invest state and federal funds that advance equity and access for students with unique needs. As they are making such plans, they must be more transparent about their spending in publicly available documents. See the section above on trends and practices in Learning Continuity Plans for more details on promising practices.

Additionally, LEAs that planned health and safety expenditures that were dependent on students, teachers, and staff being physically present on campus (e.g., cleaning supplies, PPE, desk dividers/shields, and increased custodial staff), and that have not provided regular in-person instruction or services this year, should be required to account with specificity for how these budgeted funds were spent in their Annual Update.

Finally, LEAs should not combine unrelated staffing expenditures into lump actions and should provide greater detail when describing staffing expenditures to enable stakeholders to understand whether the funds are covering base salaries or increasing staff time to implement specific programs. This has been a concerning practice in past LCAPs that violates the law.

3. Expenditures to "Increase and Improve" Services for High-Need Students

Overview

More than seven years after the passage of the Local Control Funding Formula ("LCFF"), LEAs continue to struggle with the basic equity requirements at the heart of the law. Chief among these requirements is the mandate that LEAs demonstrate how they are providing increased and improved services to students in low-income families, English learners and students in foster care ("high-need students").

Consistent with the LCFF legal framework, SB 820 required LEAs to report in their Learning Continuity Plan "a description of how the [LEA] is increasing or improving services in proportion to funds generated on the basis of the number and concentration of unduplicated pupils[31] under the local control funding formula... pursuant to the regulations adopted by the state board pursuant to Section 42238.07."[32]

Our findings below indicate that there will likely be a significant lack of transparency on the planned use of billions of dollars in Supplemental and Concentration ("S&C") funds in the 2020-21 school year unless LEAs are required to provide the missing S&C expenditures and justifications in their Annual Update. High-need students

who generate S&C funds faced significant challenges as compared to their peers even prior to the pandemic, and they are now disproportionately suffering trauma and lost instructional time as a result of the pandemic. We must ensure they receive the benefit of these funds.

Findings

There were several trends in our analysis of LEAs' attention to this issue. First, we noted that many of the 48 LEAs failed to include all of their S&C funded actions in their Learning Continuity Plan. As a result, stakeholders have no means of knowing how the remaining S&C funds were used, if at all, to increase or improve services for high-need students.

Additionally, many LEAs failed to clearly explain how they are meeting their minimum obligation to increase and improve services for high-need students, as compared to all students, in proportion to the additional funds high-need students generate as required by law. Of the 48 Learning Continuity Plans reviewed, only 5 LEAs clearly included the required descriptions for every action in their Learning Continuity Plan marked as "contributing" to increase or improve services. Many LEAs did not tie their responses to any specific "contributing" action or expenditure amount. Therefore, even where LEAs attempted to justify their planned S&C expenditures, it was not clear which actions they were describing or if the description even referred to actions included in the Learning Continuity Plan (as opposed to another local planning document). This deficiency might be due, in part, to shortcomings in the Learning Continuity Plan template, which grouped all increased or improved services descriptions into a single narrative section at the end of the plan rather than requiring the descriptions alongside the corresponding "contributing" action and budgeted funding amount in the expenditure tables. The template also failed to track the revised language of the new LCAP template, which calls for a description of "each" specific action.

We also noted that most LEAs failed to properly justify the use of S&C funds that were used to provide school-wide or LEA-wide services by describing how they are "principally directed" and "effective" in serving the high-need students who generate those dollars. On the whole, LEAs generally provided blanket justifications about need and conclusory statements regarding the effectiveness of planned actions. For the "principally directed" analysis, few LEAs explained an identified need of the students that the designated action or service was intended to meet. For the "effectiveness" analysis, most LEAs did not describe how they planned to measure the progress of the action or service to assess the impact and whether it would actually improve outcomes for the intended high-need students.

Recommendations

LEAs should be required to report on their S&C budgeted and actual expenditure amounts in the Annual Update for all S&C funds received in 2020-21, not just those budgeted in the Learning Continuity Plan, as well as explain the reasons for any unspent S&C funds that will be carried over to next fiscal year. This will provide valuable information for the community and stakeholders, which can be used to inform development of the new three-year LCAP.

In the LCAP, LEAs should clearly link the justification for every action in the Summary of Increased/Improved Services for high-need students to the associated goal, action/service description, and expenditure amount.

Finally, the State, including the California Department of Education and the California Collaborative for Educational Excellence, should provide additional training and capacity building to LEAs to ensure they improve their understanding of how to demonstrate increased and improved services pursuant to their proportionality obligation, including the proper analysis under the LCFF regulations that is grounded in the needs of high-need students and data around the effectiveness of proposed actions.

> *The significant lack of legal compliance with the LCFF expenditure requirements in the 2020-21 fiscal year must not be repeated in the coming year and underscores the need to educate LEAs on the basic requirements for demonstrating increased and improved services to high-need students.*

Conclusion and Recommendations

Now is the time for community stakeholders and LEAs to advance practices that support students – particularly students with unique needs – during the 2020-21 school year. LEAs should discontinue or at least critically examine practices that are of concern. While the 48 Learning Continuity Plans we reviewed were planning documents, and by definition cannot tell a complete story of the strategies LEAs implemented to support their staff and students, the plans provide significant insight into how LEAs hoped to support their communities through the unprecedented challenges of the first full school year during the COVID-19 pandemic.

As LEAs plan for the 2021-22 school year, complete their Annual Update and determine their budget decisions, we urge them – and the California Department of Education, which supports and guides them – to consider the following key recommendations to better plan for and support the education of all students, and particularly students with unique needs:

1. Engage in more targeted outreach to students and families, particularly reaching out to student groups representing vulnerable populations and families of students with unique needs, during the stakeholder engagement process. Include ample time for multiple opportunities for feedback on LEA plans, and invite feedback in multiple modalities, including through live meetings, focus groups, surveys, feedback forms and other mediums. Promotion of feedback opportunities and all feedback methods should be offered in languages that are representative of families within the LEA.

2. Ensure students with unique needs receive priority, early access to additional learning time and in-person individual or small cohort instruction, as soon as available.

3. Include more detail on the services provided to students in foster care, including how those services will support their unique needs.

4. Provide information on specific strategies to deliver English Language Development to English learners.

5. COEs should provide increased, specific information on services and supports for incarcerated youth.

6. Highlight how services provided to all students (such as devices and connectivity, reengagement strategies, tutoring and other learning loss mitigation strategies) will be differentiated for students in foster care, students experiencing homelessness, and English learners.

7. Provide greater specificity around how LEAs will hire, shift and reallocate staff roles and responsibilities to address the particular challenges that students with unique needs face – for example, staff to provide services, develop emergency distance learning plans and complete reviews and assessments for students with disabilities without delay. Provide a list of staff allocated to support each subgroup of students with unique needs.

8. To address the heightened stress and trauma students are experiencing during COVID-19, prioritize and strengthen mental health and wellness in planning, invest in increased access to mental health supports and services, and provide specific details on how LEAs will identify needs, provide school-based services, and ensure connections to additional services during both in-person and remote instruction.

9. Integrate mental health promotion, social-emotional learning, peer support, and trauma-informed practices into school and classroom environments, and ensure teachers and staff receive ongoing professional development opportunities to help embed and sustain these practices.

10. Monitor staff and administrator engagement in general professional development, and ensure a sustainable plan for ongoing professional development and support exists (including but not limited to the use of professional learning communities).

11. Increase inclusive access to technology and internet connectivity, and invest in added supports for families who need help engaging with technology.

12. Provide greater detail about assessments to measure learning loss and considerations for specific student groups, and more information about how the LEA will measure the effectiveness of their learning loss mitigation strategies through use of diagnostic tools such as assessments, surveys or attendance data, disaggregated by student group. Such data will help LEAs identify and prioritize subgroups that have experienced instructional loss for delivery of learning loss mitigation strategies and small cohort in-person instruction.

13. Clearly delineate the synchronous and asynchronous minutes of instruction that students can expect on a daily basis.

14. Invest in additional supplies and make learning centers available to students who do not have a suitable learning environment in the home.

15. The state should require LEAs to include detailed tables and appendices in their Annual Update explaining how they used their supplemental and concentration funding, whether or not they provided that detail in their Learning Continuity Plan.

16. Account in their Annual Update for the use of health and safety expenditures connected to in-person or on-campus instruction if the LEA did not actually reopen.

17. Provide greater detail when describing staffing expenditures to enable stakeholders to understand whether the funds are covering base salaries or increasing staff time to implement specific programs.

18. Clearly link the justification for every action in the Summary of Increased/Improved Services for high-need students to the associated goal, action/service description, and expenditure amount.

19. The state should provide additional training and capacity building to LEAs to improve their understanding of how to demonstrate increased and improved services, pursuant to their proportionality obligation under law.

20. The state should require LEAs to significantly improve transparency around budget and investments, including but not limited to providing specific information about the funding sources for investments listed in their budget planning documents, including Learning Continuity Plans, LCAPs, and Expanded Learning Opportunities Grant plans.

APPENDIX I: Characteristics of LEAs Reviewed, Based on 2019-20 Enrollment[33]

LEA Name	County	Total Enrollment	Unduplicated Pupil Count (UPC)*	
			Number of Students	Percent
Alisal Union Elementary School District	Monterey	8,507	7,915	93%
Anaheim Elementary School District	Orange	16,111	14,347	89%
Anaheim Union High School District	Orange	29,832	21,801	73%
Antelope Valley Union High School District	Los Angeles	21,152	15,363	73%
Arvin Union Elementary School District	Kern	3,086	3,002	97%
Calaveras Unified School District	Calaveras	2,875	1,548	54%
Calexico Unified School District	Imperial	8,972	8,258	92%
East Side Union High School District	Santa Clara	22,576	11,152	49%
Elk Grove Unified School District	Sacramento	63,376	35,699	56%
Eureka City Schools	Humboldt	3,674	2,567	70%
Fontana Unified School District	San Bernardino	36,160	30,817	85%
Fresno Unified School District	Fresno	70,852	63,135	89%
Garden Grove Unified School District	Orange	41,423	31,367	76%
Gilroy Unified School District	Santa Clara	11,135	6,496	58%
Greenfield Union Elementary School District	Monterey	3,495	3,344	96%
Humboldt County Office of Education	Humboldt	270	209	77%
Kern County Office of Education	Kern	1,324	1,153	87%
Lancaster Elementary School District	Los Angeles	14,332	12,800	89%
Long Beach Unified School District	Los Angeles	71,537	48,088	67%
Los Angeles County Office of Education	Los Angeles	2,003	1,255	63%
Los Angeles Unified School District	Los Angeles	433,805	369,711	85%
Los Nietos Elementary School District	Los Angeles	1,481	1,278	86%
Lucerne Elementary School District	Lake	293	250	85%
Magnolia Elementary School District	Orange	5,678	4,924	87%
Mendota Unified School District	Fresno	3,670	3,605	98%
Monterey County Office of Education	Monterey	490	425	87%
Monterey Peninsula Unified School District	Monterey	9,833	6,897	70%
Moreno Valley Unified School District	Riverside	32,169	27,322	85%
Norwalk-La Mirada Unified School District	Los Angeles	16,928	12,873	76%
Oak Grove Elementary School District	Santa Clara	9,749	4,628	47%
Oakland Unified School District	Alameda	36,110	27,383	76%
Orange County Department of Education	Orange	2,810	1,911	68%
Palmdale Elementary School District	Los Angeles	18,229	16,867	93%
Pomona Unified School District	Los Angeles	21,894	19,582	89%
Robla Elementary School District	Sacramento	2,069	1,894	92%
Sacramento City Unified School District	Sacramento	40,408	29,180	72%
Salinas City Elementary School District	Monterey	8,531	7,202	84%
San Bernardino City Unified School District	San Bernardino	48,751	44,078	90%
San Diego County Office of Education	San Diego	1,246	1,113	89%
San Francisco County Office of Education	San Francisco	333	176	53%
San Joaquin County Office of Education	San Joaquin	1,830	1,391	76%
San Jose Unified School District	Santa Clara	28,830	13,499	47%
San Ysidro Elementary School District	San Diego	4,474	3,791	85%
Santa Ana Unified School District	Orange	45,213	39,890	88%
Santa Clara County Office of Education	Santa Clara	1,368	947	69%
Stockton Unified School District	San Joaquin	35,242	28,900	82%
Twin Rivers Unified School District	Sacramento	23,014	20,902	91%
West Contra Costa Unified School District	Contra Costa	28,244	19,673	70%

*Unduplicated Pupil Count, as defined in the Local Control Funding Formula, is the unduplicated number of students in foster care, students in low-income families, and English learners enrolled in an LEA. See Cal. Educ. Code § 42238.02(b)(1).

APPENDIX II: Rubric Questions for Reviewing Learning Continuity Plans

Stakeholder Engagement

- How did the district respond to the District English Language Advisory Committee and Parent Advisory Committee in its stakeholder engagement efforts?
- How was stakeholder engagement (and input from students and families, specifically) integrated into specific sections of the Learning Continuity Plan?

In-Person Instructional Offerings

- What safety protocols will the district use?
- How will the district prioritize student groups for in-person instruction?

Actions Related to In-Person Instructional Offerings

- Do all the major activities described in the In-Person Instructional Offerings section appear in this table as specific actions and expenditures?

Distance Learning Program – Continuity of Instruction

- How will the district provide access to tutoring and academic supports for students using multiple instructional modes (via distance learning, in person or other modes based on limited or no internet connectivity)?
- How will the district provide supports to students who do not have a suitable learning environment at home?
- How will the district address lost instructional time due to inadequate or no internet connectivity during distance or hybrid learning?

Access to Devices and Connectivity

- How will the district assess and ensure every student has access to a device and sufficient connectivity?

Pupil Participation and Progress

- How will the district provide synchronous and asynchronous instructional minutes each day?
- How will the district measure and strive to ensure daily student engagement in synchronous and asynchronous learning?

Distance Learning Professional Development

- How does the district directly address students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities) in its professional development plan?
- Does the district describe professional development for staff other than teachers?
- How will the district monitor staff's engagement with professional development?
- How will the district support staff to engage in professional development over time?

Staff Roles and Responsibilities

- How will the district make staffing changes or additions to support the needs of students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities)?

Supports for Pupils with Unique Needs

- Which supports will the district provide specifically to students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities), whether new or existing specialized services, such as designated English Language Development, special education, etc.?

Actions Related to the Distance Learning Program

- Do the major actions described in the entire Distance Learning section appear here as specific actions and expenditures?

Pupil Learning Loss

- How will the district use evidence-based assessments and timelines for assessing learning loss generally and in each core area (English language arts, English language development, and math)?

Pupil Learning Loss Strategies

- What strategies will the district use to mitigate learning loss, particularly for students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities)?

Effectiveness of Pupil Learning Loss Strategies

- How will the district monitor the effectiveness of Pupil Learning Loss mitigation strategies specific to students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities)?

Actions to Address Pupil Learning Loss

- Do the major actions described in the entire Pupil Learning Loss section appear here as specific actions and expenditures?

Mental Health and Social and Emotional Well-Being

- What professional development will be provided to teachers/staff to address students' mental health needs and social-emotional learning?
- How will the district provide mental health information/resources/supports and connections to outside mental health services, as needed, to students and families?
- How will the district utilize trauma-informed practices, peer-to-peer connection and social-emotional learning in the classroom?

Pupil and Family Engagement and Outreach

- Which specific strategies will the district use to reengage students with unique needs (students in foster care, students in the juvenile justice system, students experiencing homelessness, students who are English learners, students in low-income families, students of color, and students with disabilities)?
- How will the district assess student device and internet access, strength, and reliability of connection as part of its reengagement protocols?
- How will the district reach out to families, including in languages other than English, when students are not engaging in instruction or meeting compulsory education requirements?

Additional Actions to Implement the Learning Continuity Plan

- Does the district include actions to support the mental health and wellness section of the Learning Continuity Plan?
- Does the district include actions to support the pupil and family engagement and outreach section of the Learning Continuity Plan?

Increased or Improved Services for Foster Youth, English Learners, and Low-Income Students

- Does the district disaggregate funding sources, including federal CARES Act funds and state funds, either in the Learning Continuity Plan or in an appendix?
- In this section, does the district include each of the actions/services listed as "Y" in the "Contributing?" columns of all actions tables in this Learning Continuity Plan? *Note: "Y" indicates "yes" that the action contributes to increasing or improving services for foster youth, English learners, and/or low-income students.*
- Does the plan explain how each action listed as "Y" in the "Contributing" column will either "increase" or "improve" services for foster youth, English learners, and low-income students?
- Look for activities in this section that are districtwide or schoolwide. Does the district provide justification for how each of those activities is principally directed at unduplicated student groups (i.e., foster youth, English learners, and low-income students)?
- Look for activities in this section that are districtwide or schoolwide. Does the district provide justification for how each of those activities is effective at serving unduplicated student groups?

APPENDIX III: Questions for Stakeholders to Ask Their District About Their Funding and Spending Plans

Learning Continuity and Attendance Plan ("Learning Continuity Plan")

1. How is the district tracking and evaluating the impact of the Learning Loss Mitigation funds it received? Will the district commit to reporting on how all these funds were spent in its Learning Continuity Plan Annual Update?

2. What percentage of Supplemental and Concentration ("S&C") funds were marked as "contributing" (funds identified as either increasing or improving services for high-need students) in the 2020-21 Learning Continuity Plan? If it is less than the total amount received, how is the district accounting for the rest of the funding and ensuring it has met its obligation to high-need students? Additionally, for funds marked as "contributing," aside from S&C funds, what other funds were included?

3. Did the district spend most or all of its funds generated by high-need students? If not, what happened and what is the district's plan to make sure high-need students benefit from these additional funds going forward?

4. Many investments, including for extracurricular and learning enrichment programs and some personal protective equipment and health and safety equipment, described in the Learning Continuity Plan were dependent on the school or district's return to in-person instruction/services. If the target school or schools in the district did not reopen, how was this money spent?

Local Control and Accountability Plan ("LCAP")

1. Will the district commit to treating the LCAP as a comprehensive plan that explains most of its budget?

2. Will the district commit to reporting on additional one-time state and federal funds received in the LCAP expenditure tables? If not, where will they be reported instead?

3. For any program or service that will be increased or decreased significantly, what is the district's plan to ensure that its decisions are data driven and community informed?

4. How will the district ensure that the new one-time state and federal pandemic relief funds it receives will be distributed with an equity lens to ensure that the needs of the most impacted students and families are addressed?

APPENDIX IV: Largest Learning Continuity Plan Expenditures Categories Key

Devices and connectivity

- Chromebooks; hotspots; assistive technology (i.e., headphones); technology for staff and classroom; IT services and software licensing.

Expanded learning and tutoring programs

- Multi-Tiered System of Support (MTSS) programming; after-school and summer learning programs; credit recovery; career and college development. (This category captures expenditures supporting MTSS and learning recovery programs rather than expenditures emphasizing staffing, which are captured under "Teacher and personnel hiring and salary.")

Teacher and personnel hiring and salary

- Substitute and guest teachers; paraprofessional and certificated staff; teachers on special assignment; learning aids; tutors; administrative staff and principals; bus drivers.

Health and safety procedures and equipment

- Personal protective equipment supplies; sanitization materials; custodial staff; facilities repair/upgrades (e.g., HVAC) and safety protocol implementation (i.e., student cohorts).

Mental health and social and emotional well-being support

- Online health supports; referral services; peer-to-peer connection opportunities; social-emotional learning pedagogy and specialized staff (e.g., counselors, psychologists, behavioral specialists, social workers, childcare, nurses and clinicians).

Professional development

- Professional development curriculum and supports for teachers and staff; scheduled teacher collaboration time; professional development curriculum emphasizing distance learning skills and other specific topics (e.g., health and safety).

Parent and pupil engagement and outreach

- Student led conferences; student support and affairs staff; childcare.

Instructional materials and supplies

- Core curriculum materials; library books and non-technology-based instructional materials and school supplies.

Nutrition

- Delivery; pick-up services and expanded meal programs.

Extracurricular and learning enrichment opportunities

- Athletics and music related expenses; fine arts programming, in-person and virtual field trips and student engagement (i.e., student conferences).

*Combined expenditures are identified with an asterisk. These represent instances where one or more of an LEA's largest planned expenditures described investments in multiple programs and services from various categories. For example, a single planned expenditure includes unrelated supports such as for professional development, staff salaries, and technology, without identifying the amounts planned for each. To provide greater fiscal transparency to stakeholders, we recommend that LEAs do not combine unrelated expenditures into a single lump sum in their planning documents.

APPENDIX V: Largest Planned Expenditures by LEA and Additional Fiscal Data

LEA Name	Learning Continuity and Attendance Plan ("LCP") and Budget Overview for Parents ("BOP") Web Links	Learning Loss Mitigation Funds Received	Largest Three Planned Expenditures Category	Amount Budgeted in the LCP	Percentage of Total LCP Budget as Reported in the BOP
Alisal Union Elementary School District	Learning Continuity Plan Budget Overview for Parents	$10,751,423	Devices and connectivity (x3)	$3,162,345	25.18%
Anaheim Elementary School District	Learning Continuity Plan Budget Overview for Parents	$20,789,582	Devices and conectivity (x2)	$15,945,607	18.31%
			Mental health and social and emotional wellbeing support	$6,900,000	7.92%
Anaheim Union High School District	Learning Continuity Plan Budget Overview for Parents	$31,087,124	Devices and connectivity	$5,200,000	20.59%
			Expanded learning programs	$2,400,000	9.50%
			Health and safety procedures and practices	$6,000,000	23.75%
Antelope Valley Union High School District	Learning Continuity Plan Budget Overview for Parents	$22,536,060	Devices and connectivity	$17,865,975	54.79%
			Parent and pupil engagement and outreach	$5,497,850	16.86%
			Health and safety procedures and practices	$1,861,363	5.71%
Arvin Union Elementary School District	Learning Continuity Plan Budget Overview for Parents	$3,983,647	Extra-curricular and learning enrichment opportunities	$1,112,800	4.56%
			Teacher and personnel hiring and salary (x2)	$21,873,296	89.68%
Calaveras Unified School District	Learning Continuity Plan Budget Overview for Parents	$2,221,921	Devices and connectivity	$535,000	18.14%
			Professional development	$350,000	11.87%
			Health and safety procedures and practices	$404,000	13.70%
Calexico Unified School District	Learning Continuity Plan Budget Overview for Parents	$11,249,251	Devices and connectivity	$8,018,233	51.01%
			Expanded learning programs	$1,783,715	11.35%
			Health and safety procedures and practices	$961,175	6.11%
East Side Union High School District	Learning Continuity Plan Budget Overview for Parents	$14,493,249	Devices and connectivity	$566,251	24.14%
			Professional development	$220,000	9.38%
			Health and safety procedures and practices	$275,482	11.75%
Elk Grove Unified School District	Learning Continuity Plan Budget Overview for Parents	$44,041,294	Devices and connectivity	$24,200,843	44.08%
			Expanded learning programs	$4,005,937	7.30%
			Instructional materials and supplies	$4,840,000	8.82%
Eureka City Schools	Learning Continuity Plan Budget Overview for Parents	$3,590,919	Devices and connectivity (x2)	$1,475,000	31.93%
			Health and safety procedures and practices	$700,000	15.15%
Fontana Unified School District	Learning Continuity Plan Budget Overview for Parents	$44,285,756	Devices and connectivity	$6,700,000	12.12%
			Teacher and personnel hiring and salary	$5,337,521	9.66%
			Instructional materials and supplies	$10,500,000	18.99%
Fresno Unified School District	Learning Continuity Plan Budget Overview for Parents	$86,952,063	Mental health and social and emotional wellbeing support	$22,135,514	11.16%
			Extra-curricular and learning enrichment opportunities	$27,719,453	13.97%
			Expanded learning programs	$20,026,770	10.10%

District	Links	Total	Category	Amount	Percent
Garden Grove Unified School District	Learning Continuity Plan Budget Overview for Parents	$43,883,051	Devices and connectivity	$7,840,000	14.09%
			Health and safety procedures and practices (x2)	$12,100,000	21.75%
Gilroy Unified School District	Learning Continuity Plan Budget Overview for Parents	$8,194,648	Devices and connectivity	$1,500,000	33.37%
			Teacher and personnel hiring and salary	$800,000	17.80%
			Nutrition	$700,000	15.57%
Greenfield Union Elementary School District	Learning Continuity Plan Budget Overview for Parents	$11,517,375	Devices and connectivity	$4,084,778	11.82%
			Expanded learning programs	$6,409,357	18.54%
			Teacher and personnel hiring and salary	$14,022,220	40.56%
Humboldt County Office of Education	Learning Continuity Plan Budget Overview for Parents	$1,027,603	Mental health and social and emotional wellbeing support	$167,576	18.48%
			Expanded learning programs	$84,790	9.35%
			Teacher and personnel hiring and salary	$379,724	41.87%
Kern County Office of Education	Learning Continuity Plan Budget Overview for Parents	$4,293,573	Mental health and social and emotional wellbeing support	$826,214	17.64%
			Teacher and personnel hiring and salary (x2)	$2,551,288	54.46%
Lancaster Elementary School District	Learning Continuity Plan Budget Overview for Parents	$17,688,912	Expanded learning programs	$6,360,755	5.99%
			Health and safety procedures and practices	$11,306,108	10.64%
			Teacher and personnel hiring and salary	$66,218,996	62.31%
Long Beach Unified School District	Learning Continuity Plan Budget Overview for Parents	$66,889,478	Devices and connectivity	$11,984,450	9.58%
			Health and safety procedures and practices	$15,147,774	12.11%
			Nutrition	$20,074,300	16.05%
Los Angeles County Office of Education	Learning Continuity Plan Budget Overview for Parents	$5,926,216	Devices and connectivity	$1,500,000	27.79%
			Professional development	$700,000	12.97%
			Expanded learning programs	$850,000	15.75%
Los Angeles Unified School District	Learning Continuity Plan Budget Overview for Parents	$540,519,500	Expanded learning programs	$962,416,070	34.10%
			Teacher and personnel hiring and salary	$599,164,682	21.23%
Los Nietos Elementary School District	Learning Continuity Plan Budget Overview for Parents	$2,061,600	Expanded learning programs (x2)	$1,820,000	41.08%
			Health and safety procedures and practices	$525,000	11.85%
Lucerne Elementary School District	Learning Continuity Plan Budget Overview for Parents	$358,037	Devices and connectivity	$72,000	25.51%
			Expanded learning programs	$43,083	15.27%
			Teacher and personnel hiring and salary	$123,645	43.81%
Magnolia Elementary School District	Learning Continuity Plan Budget Overview for Parents	$6,911,385	Mental health and social and emotional wellbeing support	$2,598,365	4.85%
			Health and safety procedures and practices	$3,338,074	6.23%
			Teacher and personnel hiring and salary	$28,850,711	53.86%
Mendota Unified School District	Learning Continuity Plan Budget Overview for Parents	$4,548,189	Devices and connectivity (x2)	$2,000,000	35.75%
			Expanded learning programs	$750,000	13.40%
Monterey County Office of Education	Learning Continuity Plan Budget Overview for Parents	$1,553,480	Devices and connectivity	$100,000	22.62%
			Professional development	$100,000	22.62%
			Parent and pupil engagement and outreach	$50,000	11.31%

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

32

District	Plans	Total	Category	Amount	Percent
Monterey Peninsula Unified School District	Learning Continuity Plan Budget Overview for Parents	$9,089,029	Devices and connectivity	$436,792	34.58%
			Expanded learning programs (x2)	$722,500	57.21%
Moreno Valley Unified School District	Learning Continuity Plan Budget Overview for Parents	$39,087,969	Devices and connectivity	$15,000,000	20.30%
			Health and safety procedures and practices (x2)	$17,000,000	23.01%
Norwalk-La Mirada Unified School District	Learning Continuity Plan Budget Overview for Parents	$17,773,905	Devices and connectivity (x2)	$5,800,010	38.54%
			Teacher and personnel hiring and salary	$3,675,522	24.42%
Oak Grove Elementary School District	Learning Continuity Plan Budget Overview for Parents	$5,930,214	Parent and pupil engagement and outreach	$568,894	8.75%
			Health and safety procedures and practices	$1,365,041	21.01%
			Teacher and personnel hiring and salary	$1,029,185	15.84%
Oakland Unified School District	Learning Continuity Plan Budget Overview for Parents	$39,100,142	Devices and connectivity	$6,250,000	4.04%
			Expanded learning programs	$5,000,000	3.23%
			Teacher and personnel hiring and salary	$3,225,250	2.09%
Orange County Department of Education	Learning Continuity Plan Budget Overview for Parents	$8,084,157	Mental health and social and emotional wellbeing support	$320,000	25.27%
			Devices and connectivity	$329,272	26.01%
			Teacher and personnel hiring and salary	$148,955	11.76%
Palmdale Elementary School District	Learning Continuity Plan Budget Overview for Parents	$24,091,581	Expanded learning programs	$8,308,537	11.84%
			Teacher and personnel hiring and salary (x2)	$17,006,450	24.23%
Pomona Unified School District	Learning Continuity Plan Budget Overview for Parents	$28,543,967	Expanded learning programs (x2)	$6,026,924	9.94%
			Nutrition	$3,445,348	5.68%
Robla Elementary School District	Learning Continuity Plan Budget Overview for Parents	$2,567,549	Devices and connectivity	$447,265	20.49%
			Professional development	$185,628	8.50%
			Teacher and personnel hiring and salary	$196,191	8.99%
Sacramento City Unified School District	Learning Continuity Plan Budget Overview for Parents	$40,438,566	Mental health and social and emotional wellbeing support	$19,623,365	24.63%
			Expanded learning programs (x2)	$17,718,849	22.24%
Salinas City Elementary School District	Learning Continuity Plan Budget Overview for Parents	$9,471,295	Devices and connectivity	$4,039,000	18.64%
			Expanded learning programs	$1,212,982	5.60%
			Health and safety procedures and practices	$650,000	3.00%
San Bernardino City Unified School District	Learning Continuity Plan Budget Overview for Parents	$61,935,597	Devices and connectivity	$47,300,000	22.78%
			*Combined Expenditures (x2)	$68,791,000	33.13%
San Diego County Office of Education	Learning Continuity Plan Budget Overview for Parents	$4,262,384	Parent and pupil engagement and outreach	$3,565,169	18.90%
			Health and safety procedures and practices	$2,135,360	11.32%
			Teacher and personnel hiring and salary	$2,052,476	10.88%
San Francisco County Office of Education	Learning Continuity Plan Budget Overview for Parents	$518,660	Devices and connectivity (x2)	$27,227,000	28.12%
			Expanded learning programs	$24,100,000	24.89%

San Joaquin County Office of Education	Learning Continuity Plan Budget Overview for Parents	$5,122,891	Devices and connectivity (x2)	$1,406,438	45.92%
			Health and safety procedures and practices	$429,713	14.03%
San Jose Unified School District	Learning Continuity Plan Budget Overview for Parents	$17,945,960	Expanded learning programs (x2)	$10,000,000	16.94%
			Nutrition	$11,600,000	19.65%
San Ysidro Elementary School District	Learning Continuity Plan Budget Overview for Parents	$5,219,672	Devices and connectivity	$1,620,000	18.51%
			Expanded learning programs	$1,400,000	16.00%
			*Combined Expenditures	$1,360,340	15.55%
Santa Ana Unified School District	Learning Continuity Plan Budget Overview for Parents	$59,026,963	Health and safety procedures and practices	$31,772,866	16.39%
			Teacher and personnel hiring and salary (x2)	$90,253,427	46.56%
Santa Clara County Office of Education	Learning Continuity Plan Budget Overview for Parents	$4,078,360	Devices and connectivity (x2)	$1,359,811	44.68%
			Instructional materials and supplies	$1,081,359	35.53%
Stockton Unified School District	Learning Continuity Plan Budget Overview for Parents	$39,073,789	Mental health and social and emotional wellbeing support	$10,198,220	11.88%
			Devices and connectivity	$8,165,760	9.51%
			Professional development	$11,443,348	13.33%
Twin Rivers Unified School District	Learning Continuity Plan Budget Overview for Parents	$30,422,671	Devices and connectivity	$18,368,851	42.91%
			Health and safety procedures and practices	$7,568,803	17.68%
			Instructional materials and supplies	$5,066,478	11.83%
West Contra Costa Unified School District	Learning Continuity Plan Budget Overview for Parents	$27,801,706	Teacher and personnel hiring and salary (x2)	$108,312,522	86.65%[†]
			*Combined Expenditures	$50,000,000	40.00%[†]

Note: Expenditure categories with (x#) signifies that 2 or more of the largest 3 planned expenditures fall within the same category.

† These percentages are based on the total amount budgeted in the Learning Continuity Plan as reported by West Contra Costa Unified School District in their Budget Overview for Parents. The total budgeted expenditures included in the LCP ($190,435,834) is greater than what was reported in the BOP ($125,000,000). The actual percentages based on the total amount budgeted in the LCP are: Teacher and personnel hiring and salary (x2): 56.87%; Combined expenditures: 26.25%.

How Districts Planned for Pandemic Learning: Equity-Driven Practices and Lessons Learned from 2020 Learning Continuity and Attendance Plans

34

Credits and Acknowledgments

Californians Together is a statewide advocacy coalition of powerful organizations from all segments of the education community including teachers, administrators, board members, parents and civil rights non-profit groups. Our member organizations come together around the goal of better educating 1.1 million English learners by improving California's schools and promoting equitable educational policy. Learn more at www.californianstogether.org

Children Now is on a mission to build power for kids. The organization conducts non-partisan research, policy development, and advocacy reflecting a whole-child approach to improving the lives of kids, especially kids of color and kids living in poverty, from prenatal through age 26. Learn more at www.childrennow.org
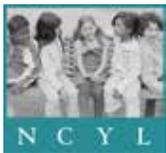
The National Center for Youth Law ("NCYL") is a private, non-profit law firm that uses the law to help children achieve their potential by transforming the public agencies that serve them. For 50 years, NCYL has worked to protect the rights of low-income children and to ensure that they have the resources, support, and opportunities they need to become self-sufficient adults. Learn more at www.youthlaw.org.

Public Advocates is a nonprofit civil rights law firm and advocacy organization that challenges the systemic causes of poverty and discrimination. For fifty years it has strengthened community voices in public policy and achieved tangible legal victories advancing education, housing, transportation, and climate justice. Learn more at www.publicadvocates.org

Image credits:
Cover photograph by twinsterphoto via iStock
Photograph on pages 4, 9, and 14 by FG Trade via iStock
Photograph on page 24 by kali9 via iStock

Endnotes

1 California Department of Education Learning Continuity Plan Template and Instructions, https://www.cde.ca.gov/re/lc/learningcontattendplan.asp.

2 While the Learning Continuity Plan uses the term "learning loss," we recognize this deficit-based language implies that students did not learn because of their own failings rather than the difficult circumstances, including uneven distance learning instruction and supports provided by LEAs. Therefore, for clarity, we may continue to use this term, but we may also use the terms "instructional loss" or "learning recovery" to focus attention on systems' responsibility to support students.

3 *See* Cal. Educ. Code § 43509(b)(3).

4 *See* Cal. Educ. Code § 43509(e), (f); Cal. Dep't of Educ. Learning Continuity Plan Template and Instructions, https://www.cde.ca.gov/re/lc/learningcontattendplan.asp.

5 Each of the 48 Learning Continuity Plans had 13 sections in which LEAs could address student needs, equaling a total of 624 possible areas in all Learning Continuity Plans where student groups could have been mentioned one or more times.

6 *See* Cal. Educ. Code § 43509(f)(1)(B)(vi).

7 Antelope Valley Union High School District, Eureka City Schools, Fresno Unified, Kern County Office of Education, Lancaster Elementary School District, Los Angeles Unified, Monterey Peninsula Unified, Norwalk-La Mirada Unified, Oakland Unified, Pomona Unified, Sacramento City Unified, San Bernardino City Unified, Stockton Unified, and West Contra Costa Unified.

8 East Side Union High, Fresno Unified, Los Angeles Unified, Monterey Peninsula Unified, Norwalk-La Mirada Unified, Oakland Unified, Orange County Department of Education, Palmdale Elementary School District, Pomona Unified, San Bernardino City Unified, and Twin Rivers Unified.

9 Antelope Valley Union, Calaveras Unified, Gilroy Unified, Monterey Peninsula Unified, Oak Grove Elementary School District, Orange County Department of Education, Pomona Unified, San Bernardino City Unified, San Ysidro Elementary School District, and Santa Ana Unified.

10 *See* Cal. Educ. Code § 56345(a)(9).

11 *See* Cal. Educ. Code § 43509(f)(1)(B)(ii); Cal. Dep't of Educ. Learning Continuity Plan Template and Instructions, https://www.cde.ca.gov/re/lc/learningcontattendplan.asp.

12 *See* Cal. Educ. Code §§ 43503(b)(1), 60010(h), 60119(c)(1).

13 *See* Cal. Educ. Code 43509(f)(1)(B)(vi). Though this section of statute does not define pupils in foster care, "pupils in foster care" is described elsewhere in the California Education Code as including students in foster care and students in the juvenile justice system, regardless of whether they are placed out of home. *See* Cal. Educ. Code §§ 49069.5(j)(3); 51225.1; 51225.2(a)(1).

14 *See* Cal. Educ. Code 43509(f)(1)(C)(ii), (iii). This section of statute lists both "foster youth" and "pupils in foster care". The statute specifically defines "foster youth" with reference to Cal. Educ. Code § 42238.01, which provides a limited definition of foster youth that includes students in foster care, students in the juvenile justice system who are in suitable placements, transition age youth, and dependent children under the jurisdiction of Indian courts. However, "pupils in foster care" is not defined in this section of statute. The inclusion of "foster youth" and "pupils in foster care" indicates the Legislature intended a broader group of students to be included. See note 14 for the definition of pupils in foster care, which includes all students in the juvenile justice system.

15 *See* Cal. Educ. Code § 43509(f)(1)(D).

16 *See* Cal. Educ. Code § 43509(f)(1)(E).

17 *See* id.

18 *See* Cal. Educ. Code § 43509(f)(1)(C)(i).

19 *See* Cal. Educ. Code § 43503(b)(2).

20 *See* https://coredistricts.org/about-us/.

21 *See* Cal. Educ. Code § 43501.

22 *See* Cal. Dep't of Educ., "Coronavirus Response and School Reopening Guidance," https://www.cde.ca.gov/ls/he/hn/coronavirus.asp.

23 *See* Cal. Dep't of Public Health, "Guidance Related to Cohorts – UPDATED September 4, 2020," https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/small-groups-child-youth.aspx.

24 *See* Cal. Educ. Code § 43509(f)(2) (stating the Learning Continuity Plan "shall describe how federal and state funding included in the original or revised budget adopted by the governing board of a school district ... is used to support the efforts described in the [Learning Continuity Plan], including federal and state funds provided for learning loss mitigation").

25 *See* 2020-21 LCFF Budget Overviews for Parents.

26 As we describe in Section II(c), this calls into question whether districts met their equity obligation to increase or improve services for high-need students even though this legal requirement was explicitly maintained for this fiscal year.

27 San Francisco County Office of Education received $396,102 S&C dollars but budgeted $52,322,783 (13,209%) in their Learning Continuity Plan for high-need students, according to their Budget Overview for Parents. The next highest percentage budgeted was Magnolia Elementary School District, which budgeted 349% of the total funds they received for high-need students.

28 *See* 2020-21 LCFF Budget Overviews for Parents.

29 Due to variances in the sizes of LEAs we reviewed and the percentage of total funding that LEAs budgeted in their Learning Continuity Plan, we looked at the size of the investment relative to each LEA's total planned expenditures reported in their Learning Continuity Plan.

30 *See* Public Policy Institute of California, "Just the Facts: California's Digital Divide," https://www.ppic.org/publication/californias-digital-divide/.

31 Unduplicated pupils are students in low-income families, English learners and students in foster care.

32 *See* Cal. Educ. Code § 43509(f)(3).

33 Cal. Dep't of Educ., "CALPADS Unduplicated Pupil Count (UPC) Source File (K-12)," https://www.cde.ca.gov/ds/sd/sd/filescupc.asp (link to 2019-20 school year). Enrollment and UPC counts are based on a point-in-time count in the fall of 2019.