

What's Next for the Local Control Funding Formula?

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Executive Summary

California enacted a groundbreaking shift to its school-funding system when it passed the Local Control Funding Formula (LCFF) in 2013. The law sought to make funding more equitable and also aimed to increase local control based on the premise that budgeting decisions are best made at the local level in partnership with community stakeholders, who must, in turn, hold the district accountable.

This report takes stock of LCFF 8 years after its passage and explores ways it can be further refined to improve equitable funding, opportunities, and outcomes in California. Our findings are based on: (a) interviews with 19 California education leaders and policy observers, (b) an extensive review of the research on LCFF implementation, (c) an analysis of school-funding data, and (d) an analysis of recent legislation.

Most of our interviewees viewed LCFF as a major improvement over the system it replaced. Even so, most agreed there are opportunities to improve the formula and its implementation, particularly because there are still gaps between LCFF's equity goals and the outcomes being achieved at the local level. Based on these discussions and our analysis, we identified four areas in which improvements are warranted:

1. **Revisit and refine the funding formula.** Strengthen weights and funding streams for high-need students to improve funding equity and end legacy programs that conflict with LCFF's equity and coherence goals.
2. **Modernize funding for students with disabilities.** Work to align funding for general and special education in a way that better emphasizes a statewide commitment to inclusive education.
3. **Equitably distribute effective teachers.** Increase transparency and accountability around how teachers are distributed, and sustain and grow policies and programs that increase equitable access to effective teachers and improve teacher working conditions.
4. **Strengthen transparency, engagement, and accountability.** Ensure that LCFF supplemental and concentration grants are appropriately used to support a district's high-need student groups, improve stakeholder access to clear fiscal data, and invest in programs that will improve meaningful stakeholder engagement.

Introduction

“ It was a tremendous win of state government to coalesce and do something positive for students and reimagine the funding formula. It tried, perhaps for the first time in California history, to really look at what was equitable for our students.”

STATE POLICYMAKER, 2020

In the 8 years since the Local Control Funding Formula (LCFF) was enacted, not all education stakeholders have been as enthusiastic as the policymaker quoted above. But every one of the 19 educators, advocates, and policymakers we interviewed in late 2020 and early 2021 held mostly positive views of LCFF, believed it advanced equity, and agreed that the new funding formula was a big improvement over the previous system. At the same time, they had ideas about how to realize LCFF’s vision more fully.

In this report, we ask: How can the state improve LCFF’s equity goals? Those original goals included improving funding equity, simplifying an outdated and complex funding formula, and increasing local control and engagement. The policy also broadened the state’s measures of school success and reshaped its school accountability system.

As researchers who have long studied the implementation of LCFF, we started with the view, supported by evidence from prior research, that LCFF has advanced equity both in terms of funding progressivity (Bruno, 2018; Chen & Hahnel, 2017) and improved outcomes for historically underserved student groups (Johnson & Tanner, 2018). But despite this progress, California continues to lag behind the nation as a whole when it comes to educational outcomes, and many student groups—particularly Black and Latinx students, English learners, students from low-income families, and students with disabilities—continue to experience wide and troubling opportunity and achievement gaps (Edley & Kimner, 2018; Reardon et al., 2018).

Our intention with this research was to gather the insights of key education leaders, policymakers, and observers on how the equity goals of LCFF can be more fully realized. Over several months, we conducted interviews with 19 individuals well positioned to reflect on LCFF and what changes might be needed. We also reviewed the literature, analyzed data on how the state is apportioning LCFF dollars, and analyzed recent legislation, especially the 2021–22 budget.

Our original plan was to focus on issues related to the specifics of the funding formula. However, as our interviewees repeatedly pointed out, it is important to consider all the interrelated components of LCFF, including other programs and funding streams that interact with the formula, systems of support, transparency, accountability, and engagement.

Funding Equity and Adequacy Must Go Hand in Hand

Through our interviews, we sought to learn how LCFF could further achieve equity. However, many of the people we spoke with pointed out that LCFF’s ability to achieve its equity goals fully is limited by inadequate education resources, despite recent increases in state funding for schools.

LCFF does not generate resources—it only distributes revenues and governs their spending. LCFF’s first decade of implementation has coincided with steadily increasing state revenues. In addition, during the COVID-19 pandemic Local Education Agencies (LEAs) have been flooded by federal stimulus revenues and new state funds designed to benefit the state’s low-income students of color and their families. While it may seem like LCFF has helped improved funding, stakeholders must be careful not to conflate LCFF’s *distribution* mechanism with the state’s funding mechanisms.

We do not dig into issues of funding sufficiency in this brief as those merit their own discussion and have been well covered by other PACE research.¹ Yet policymakers will soon need to address the likelihood that many school districts will face severe fiscal problems in the coming years as a result of declining enrollment, increasing pension and health care costs, and the end of the one-time state and federal pandemic-relief funding. Policymakers and district leaders need to start planning for ways to avoid this fiscal cliff. Although this paper is focused on impediments to LCFF’s progress towards equity, efforts to refine LCFF must also address adequacy.

Although our informants agreed that LCFF needed some refinements, we heard less agreement over what specific refinements were needed or what legislative priorities should be. This may be in part because the sweeping LCFF policy encompasses so much: funding, strategies for improving schools, accountability, stakeholder engagement, and more. Furthermore, there were differences of opinion regarding the features of LCFF that were the most important. It was also difficult for individuals to pinpoint exactly what levers could be pulled that would dramatically improve student opportunities and outcomes. Despite this complexity, we were able to identify four major themes.

This report begins with a summary of how LCFF works and existing research on its implementation. We then present four broad recommendations, with some containing more specific and detailed suggestions. We conclude with reflections on LCFF and its future.

Background and Research on LCFF

LCFF changed how state resources are allocated to LEAs, including County Offices of Education (COEs), school districts, and charter schools, by creating a simpler and more equitable formula. LCFF eliminated about 30 categorical programs and combined the funds with the old

¹ See PACE’s research on education finance: <https://edpolicyinca.org/topics/education-finance>.

“revenue limit” grants. It redistributed these funds so that LEAs with more low-income students, English learners, and/or foster youth would receive more resources, and all LEAs now have greater budget flexibility. While this is true in the aggregate, California’s best-funded school districts continue to be found in wealthier communities. Some of these districts are basic aid (or what some call “community-funded”) districts, which tend to have high commercial or residential property tax revenues, and some are places where local fundraising efforts offset lower state allocations. (For more information about basic aid, see the box “Key Components of LCFF.”)

Key Components of LCFF

Funding formula for school districts and charter schools:²

- Districts and charter schools are entitled to a **base grant** for each student, adjusted for attendance.³
- Districts and charter schools are entitled to a **supplemental grant** of 20 percent of the base grant for each student who is eligible for free or reduced-price meals, an English learner, and/or in foster care (the state calls these students “unduplicated”).
- Districts that are more than 55 percent unduplicated are entitled to a **concentration grant** of 65 percent of the base grant for each unduplicated student above the 55-percent threshold.⁴ For charter schools, the percentage of unduplicated students used to calculate the concentration grant is the lesser of its own percentage of unduplicated students or the percentage of its surrounding school district.
- Some districts and charter schools receive **add-on funding** equal to Home-to-School Transportation and Targeted Instructional Improvement Block Grant funding received in 2012–13; this is further discussed in the “Revisit and Refine the Funding Formula” section of this report.
- The state pays the difference between a district or charter school’s total LCFF entitlement and its local property tax revenues.⁵ For school districts, if those tax revenues exceed the LCFF entitlement, the district keeps the excess (these districts are called “basic aid” or “excess tax” districts).
- Supplemental and concentration grants must be used to increase and improve services for the student who generated them.

² The formula works somewhat differently for COEs, which receive different base grants as well as different supplemental and concentration weights. More details can be found through the California Department of Education: <https://www.cde.ca.gov/fg/aa/pa/pa2122rates.asp>.

³ Some small and geographically isolated districts receive a Necessary Small Schools grant instead.

⁴ Previously, this weight was 50 percent of the base grant. It increased to 65 percent in the state’s 2021–22 budget bill (Section 26 of AB 130).

⁵ For charter schools, this is the in-lieu property tax amount provided to a charter school.

Accountability and support:

- The **Local Control and Accountability Plan (LCAP)** is intended to support local planning, transparency, and accountability. Each LEA adopts a new plan every three years and adopts annual updates to the plan.
- The **California School Dashboard** reports on the performance of the state, each LEA, and each school site across six state and five local indicators for a variety of student groups.⁶
- The **System of Support** is designed to provide tiered levels of assistance to LEAs based on their performance on the California School Dashboard.⁷

Many researchers have followed the implementation of LCFF from its beginning. The following are some key findings that emerged from that work:

- LCFF enjoys substantial support from educators, who feel that it has helped them focus on improving services and outcomes for students (Koppich, 2019), but public awareness of LCFF is relatively low (Koppich et al., 2018).
- LCFF has made state resource allocation more equitable across districts (Bruno, 2018; Chen & Hahnel, 2017); however, it has not fundamentally changed the distribution of resources to schools within districts (Silberstein & Roza, 2020; Lafortune, 2021).
- LCFF has improved coordination between district instructional and budget staff and has helped district leaders rethink budget priorities (Willis et al., 2018).
- Stakeholder engagement is evolving (Humphrey et al., 2018), but meaningful engagement of parents, students, teachers, and community members is still challenging for most districts (Koppich et al., 2018), with many struggling to meaningfully engage communities of color and non-English-speaking families (Jiménez-Castellanos et al., 2019).
- Accountability and communication mechanisms receive mixed reviews. LCAPs lack coherence and insufficiently describe equitable services (Chen, 2016; Lavadenz et al., 2019). Educators view the Dashboard as an improvement from the previous system of measuring school and district performance, but a variety of technical problems, the timing of its release, and its accessibility limit its effectiveness (Polikoff et al., 2018). School board involvement in LCAP development is typically modest at best (Koppich & Humphrey, 2018).

⁶ The six state indicators are Academics (English language arts and mathematics), English Learner Progress, Chronic Absenteeism, Graduation, Suspensions, and College/Career Readiness. The five local indicators are Basic Services and Conditions, Implementation of State Academic Standards, Parent and Family Engagement, School Climate, and Access to a Broad Course of Study.

⁷ California's System of Support has three levels of support. The first level, general assistance, provides resources and assistance to all LEAs and schools. The second level, Differentiated Assistance, is targeted support available to LEAs meeting eligibility requirements set by the State Board of Education. The third level, Intensive Intervention, may be provided to LEAs identified as having persistent performance issues and a lack of improvement over 4 consecutive years.

- LCFF has expanded the role of COEs, but the structure of the System of Support limits their ability to provide effective differentiated assistance to districts (Humphrey & O’Day, 2019).
- LCFF has contributed to better educational outcomes, with increases in school spending leading to increases in high school graduation rates and academic achievement, particularly among poor students and students of color (Johnson & Tanner, 2018; Lafortune, 2021).

Recommendation 1: Revisit and Refine the Funding Formula

The people we spoke with urged the state to maintain its commitment to the way LCFF distributes funds, as the formula design is generally strong and distributing resources as intended. However, there are a few areas where the formula can be refined so that it better meets the original goals of LCFF and addresses some implementation challenges. We first discuss the challenges and then propose five concrete solutions.

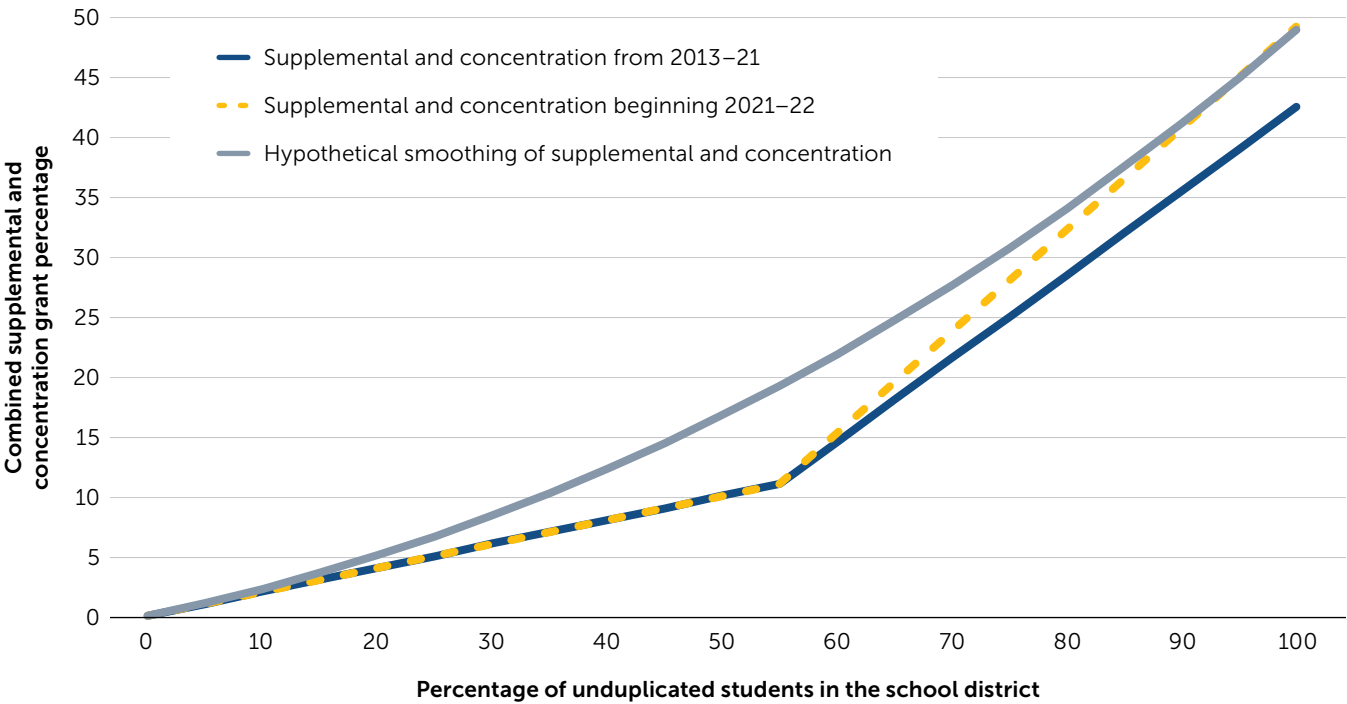
The Concentration Grant Cut Point is Arbitrary, and Supplemental and Concentration Grants May Not Be Strong Enough

When revisions to California’s education funding formula were debated in 2012 and 2013, it was not a foregone conclusion that LCFF would include a concentration grant. Ultimately, the California State Legislature was compelled by evidence showing that concentrated student poverty creates additional needs and costs for districts. Although the concentration grant makes good sense in theory, there have been three main problems with its implementation.

The first problem is that the concentration grant is only available to districts serving 55 percent or more unduplicated students, resulting in different funding levels for districts of otherwise similar need levels just above and below the 55-percent threshold.⁸ This discontinuity will increase since Governor Newsom signed a June 2021 budget raising the concentration grant weight from 50 to 65 percent (see Figure 1).

⁸ Although not discussed in this report, it is also the case that districts eligible for concentration grants have somewhat different LCAP reporting requirements than districts not eligible for those grants. While both sets of districts may use supplemental and concentration funds districtwide, those districts with fewer than 55 percent unduplicated students must explain how the funded services are *the most effective* use of funds, while districts with more than 55 percent unduplicated students must explain only how the funded services are *effective*.

Figure 1. LCFF Supplemental and Concentration Grant Funding as a Percentage of LCFF Funding



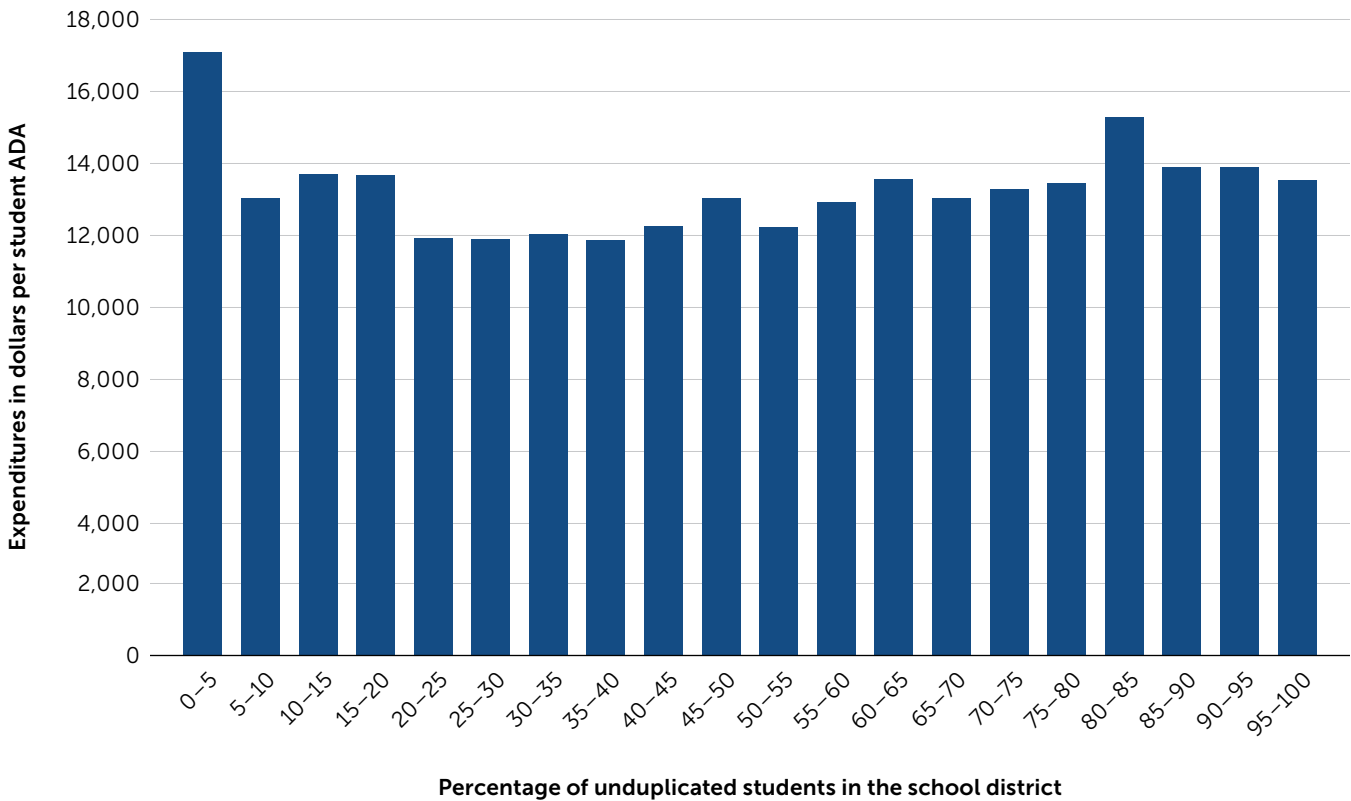
This sharp uptick is somewhat inconsistent with research concluding that the funding required to achieve the same outcomes for students in poverty and English learners progressively increases as the concentration of these students increases (Duncombe & Yinger, 2004; Levin et al., 2018; Willis et al., 2019). Although the relationship between student needs and costs may not be perfectly linear, neither does that relationship suddenly ratchet up at the 55-percent cut point. Some of our interview participants also expressed concern that the 55-percent threshold was an “arbitrary cut-off.”

To be fair, funding does not suddenly flood in when a district passes the 55-percent threshold. Instead, LCFF entitlements gradually increase as the unduplicated-student share increases (for instance, a district that is 56 percent unduplicated generates an additional 65 percent of the base grant for only 1 percent of its unduplicated students). Nevertheless, this threshold creates a clear kink in the relationship between need and revenues. Further, this cut point brings additional risk, as it misleadingly implies that there is some meaningful difference between a concentration district and a non-concentration district. In fact, in developing the 2021–22 budget, the legislature considered using that binary cutoff to determine which districts would and would not be eligible to participate in various state grant programs (most of those proposals were ultimately rescinded or revised).

The second problem is that supplemental and concentration grant weights may not be high enough to counter other fiscal inequities. Although LCFF entitlements ratchet up at the

55-percent threshold, actual per-pupil district expenditures do not follow this same pattern. Figure 2 shows that districts between 0 and 20 percent unduplicated spent about the same in 2019–20 as districts between 80 and 100 percent unduplicated on a per Average Daily Attendance (ADA) basis after accounting for spending from all federal, state, and local sources. There is a “trough” in spending for districts with about 20 to 55 percent unduplicated students.

Figure 2. Total Expenditures in 2019–20 Per Student Average Daily Attendance



Note. Expenditures per school district are weighted by ADA. Charter school LEAs, COEs, and all school districts with fewer than 100 students (based on ADA) are excluded. The 99th and 1st percentile of district expenditures are excluded in order to remove high- and low-spending outliers. All data were exported from Ed-Data (ed-data.org) and represent “Current Expense of Education,” which is total General Fund expenditures minus food services, facilities acquisition and construction, and certain other items.

What accounts for this trough? It is likely a mix of factors, but among them is the fact that low-poverty districts tend to be more successful in raising additional local revenues through parcel taxes and bonds as well as that they are more likely to be basic aid. Middle-poverty districts are also less likely than high-poverty districts to receive significant federal funds, such as Title I and Title III. Together, these data suggest that LCFF’s supplemental and concentration grant weights may not have been significant enough in prior years to offset other revenue differences and result in full spending equity.

The third problem is that charter schools' eligibility for the concentration grant is capped at the percentage of unduplicated students in the surrounding district, even though for other funding purposes charter schools are considered their own LEAs. For example, a charter school that is 95 percent unduplicated but is geographically situated within a district that is 60 percent unduplicated is only eligible to receive a concentration grant at the 60-percent level. Researchers have found that this cap negatively affects about one third of charter schools, causing them to miss out on approximately \$78 million collectively (Ugo & Hill, 2017).

Foster and Homeless Student Services Are Inadequately Funded

Although foster youth are recognized under LCFF as one of the unduplicated groups, they do not actually generate additional funding because they are already considered eligible for free meals. Homeless students are also eligible for free meals but are not explicitly recognized by the formula. Several of the people we spoke with said that districts serving higher concentrations of homeless students, foster youth, and students in other exceptional life circumstances need more resources to address these students' additional acute needs. This has been particularly true during the COVID-19 pandemic as students affected by housing and food insecurity and other family and neighborhood traumas have been among the most disengaged and difficult to serve. In recognition of this need, Governor Newsom's 2021–22 budget includes \$30 million in one-time funds to provide direct services such as tutoring and educational case management for students in foster care.

Some Remaining Categorical Programs and Add-Ons Are Inconsistent With LCFF's Goals

Although the original LCFF eliminated most categorical grant programs, it left several untouched. Some of these, such as special education and afterschool funding, were retained to fund those specific programs and continue to sit outside LCFF. (It is worth noting that in the 2021–22 budget, the governor and legislature have introduced a variety of new categorical programs, further diluting the simplicity of the LCFF formula, despite the laudable equity goals of most of these programs. In the years ahead, policymakers may need to explore how either to fold these programs into LCFF or to strengthen the coherence between LCFF and new programs like the California Community Schools Partnership Program and the Expanded Learning Opportunities program.)

However, when LCFF was passed, three programs—the Home-to-School Transportation program, the Small School District Bus Replacement Program, and the Targeted Instructional Improvement Block Grant (TIIG)—were preserved as LCFF “add-ons” and augmentations. Districts that received those funds before LCFF continue to get the same amount they received in 2012–13. In addition, two new grants were created by LCFF that are also added onto the LCFF entitlement: the Economic Recovery Target (ERT) and Additional State Aid to Meet the Minimum Guarantee (more simply known as “Minimum State Aid,” or MSA). Together, these five LCFF

add-ons provided more than \$1.5 billion to school districts in 2019–20 on top of LCFF base, supplemental, and concentration grants. See Table 1 for how these grants are distributed across districts based on district demographics.

Table 1. Distribution of Targeted Instructional Improvement Block Grant, Economic Recovery Target, and Minimum State Aid Funding in California

	TIIG	ERT	MSA
Funding per pupil, 2019–20			
Bottom 25 percent UPP districts	\$39	\$34	\$63
Middle 50 percent UPP districts	\$102	\$8	\$32
Upper 25 percent UPP districts (without LAUSD)	\$75	\$0	\$8
LAUSD	\$1,114	\$0	\$0
Statewide	\$162	\$11	\$31
Total funding, 2019–20			
Statewide	\$855,045,830	\$59,196,117	\$164,418,215

Note. UPP refers to Unduplicated Pupil Percentage. LAUSD refers to Los Angeles Unified School District, which is reported separately both because it has many more students than other districts and because it receives more TIIG funding than other districts.

We recommend that categorical and add-on programs be retained only if they have a specific, targeted purpose and are consistent with the equity, simplicity, and coherence goals of LCFF. Three of the five programs mentioned above fail to meet this standard in our view and should be revisited: TIIG, ERT, and MSA. The other two, Home-to-School Transportation and the Small School District Bus Replacement Program, may continue to serve a legitimate purpose and should be preserved, at least until the legislature can revisit their roles and appropriate funding levels. Several of the people we interviewed expressed concern that transportation has been sorely underfunded and poses a particular challenge to rural and geographically dispersed school districts, especially those with high poverty.

Targeted Instructional Improvement Block Grant. Although the \$855 million TIIG program was originally intended to fund court-ordered and voluntary desegregation and to support instructional improvement for low-performing students, it has been a fully flexible grant since 2008–09.⁹ Los Angeles Unified School District (LAUSD), which has been under a court’s desegregation order for decades, receives more than half of the funding. Other recipients include districts that voluntarily desegregated. Over time, TIIG “became a kind of a pork system,” said one legislative staffer, with well-connected legislators securing funding “under the umbrella of voluntary desegregation.”

⁹ Information about this program is maintained by the California Department of Education at cde.ca.gov/re/pr/tiibg.asp.

Economic Recovery Target. When LCFF was passed, some districts stood to receive less funding under the new formula than they did under the prior revenue-limit system. These communities successfully advocated for a hold harmless provision called ERT, which in 2019–20 provided \$59 million to primarily higher wealth communities and very small school districts.¹⁰ ERT was paid incrementally for 8 years as LCFF was implemented and became a permanent add-on in 2020–21.

Minimum State Aid. When programs for things like instructional materials and class-size reduction were dissolved and the funds consolidated into LCFF, advocates for basic aid districts fought to keep some of those funds, arguing in part that the California State Constitution requires that each district receive a minimum level of aid per pupil each year.¹¹ The result was the MSA add-on. This program provided \$166 million to school districts and charter schools in 2019–20, with \$160 million of that—roughly \$600 per pupil—going to basic aid districts. The Legislative Analyst’s Office has said that MSA serves to “provide some districts and county offices of education more funding with no clear rationale” and has repeatedly recommended eliminating the County Office of Education MSA (Legislative Analyst’s Office, 2017, 2020).

Five Ways to Improve the Funding Formula

Given all of this, our first recommendation is for the state to revisit and refine the funding formula in five main ways:

- **Combine the supplemental and concentration grants into a single grant** that grows in proportion to the concentration of unduplicated students within the LEA and that eliminates the discontinuity at the 55-percent threshold. There are many ways this could be designed and implemented, but the idea would be to create a smoother relationship between a district’s unduplicated population and its LCFF funding (see Figure 1). For example, unduplicated students could still generate at least 20 percent more for their districts, but that weight could rise to as much as 65 percent in the districts with the highest unduplicated concentrations, with the ramp-up happening sooner than the 55-percent threshold. The additional cost to fund this formula could be phased in over time. By eliminating the separate concentration grant, charter schools would also be eligible for the full supplemental grant in proportion to the number and concentration of their unduplicated students.

¹⁰ This add-on is equal to the difference between the amount districts would have received under the prior system in 2020–21 and the target LCFF allocations calculated for that same year.

¹¹ Section 6 of Article IX of the California Constitution says that this amount shall be no less than \$120 per pupil annually.

- **Explore ways to increase funding for foster and especially homeless youth** on an ongoing basis. Solutions could include creating a duplicated weight for foster and homeless youth in LCFF, doubling the size of the existing homeless youth program by matching state funds to federal dollars provided under the McKinney-Vento Homeless Assistance Act of 1987, or creating a permanent separate LCFF add-on grant for “unduplicated” foster and homeless youth.
- **End TIIG for districts no longer subject to court-ordered desegregation** and fold those dollars into LCFF.¹²
- **End or phase out the ERT.** This is particularly worth examining in the case of basic aid districts that generate significant local revenues for schools while continuing to draw down these extra state dollars.
- **End or phase out MSA.** If state lawmakers intend to continue providing additional funds to basic aid districts on top of the property tax dollars they already receive, policymakers should explore ways to allow those districts to generate state aid based on the number and concentration of their unduplicated pupils instead. As it stands, basic aid districts cover their supplemental and concentration grant obligations with local property tax dollars, since their local property taxes exceed their state-calculated entitlements. So these districts do not actually receive any LCFF funding from the state; instead, the state gives them MSA.

The state could sunset MSA and instead fund basic aid districts’ supplemental and concentration grants, thereby supporting efforts to serve high-need students. The idea is that the state would pay to increase and improve services for high-need students wherever they happen to live in the state—even if that is an otherwise property-tax-rich community—but it would no longer pay minimum aid to a district just because it exists. This would not cost the state much, since the total supplemental and concentration grants generated by students in these districts in 2019–20 was \$174 million—not much more than these districts generated in MSA. This could also help rationalize LCAP in basic aid districts and incentivize them to enroll and serve unduplicated pupils, perhaps by accepting more voluntary transfer students or even by merging with other neighboring districts. (Currently, basic aid districts are incentivized to keep numbers low since they do not receive additional funds for serving more or needier students.)

¹² According to data collected by ProPublica in 2014, six California districts—including LAUSD—may still be subject to a current desegregation court order; in addition, Sausalito Marin City has recently joined the list: [latimes.com/california/story/2019-09-21/desegregation-order-sausalito-marin-county](https://www.latimes.com/california/story/2019-09-21/desegregation-order-sausalito-marin-county).

Recommendation 2: Modernize Funding for Students with Disabilities

While LCFF improved the funding system for general education students, it did not address the way the state funds districts to serve students with disabilities (SWDs). Reflecting the opinions of many of our interviewees, one person said this regarding LCFF and SWDs: “That was an incomplete piece that wasn’t able to be done at the time and continues to not be as fully aligned as we need it to be.” Most agreed that this piece was omitted because it was especially complex given the cost variation of different types of disabilities. In addition, LCFF framers were well aware of the difficult political fight that would result from a major change to funding for SWDs. We recommend the state work to align funding for general and special education in a way that better emphasizes a statewide commitment to inclusive education.

Work to realize this goal is already underway. Building on efforts over the past 5 years, the 2020–21 state budget funded a study to examine special education governance and accountability as well as established a workgroup to design a state standardized individualized education program template and another workgroup to examine and propose alternative pathways to a high school diploma for SWDs. In addition, private philanthropy recently supported a two-part WestEd study on California’s funding system for SWDs. The two reports provided a descriptive review of the state’s special education funding system and offered recommendations for change (Doutre et al., 2021; Willis et al., 2020).

The 2021–22 budget did include significant investments in the education of SWDs. Special education funding was increased by \$396.8 million in ongoing Proposition 98 funds, and a cost-of-living adjustment of 4.05 percent was made for all Special Education Local Plan Areas. The budget also included \$260 million in ongoing funds for Special Education Early Intervention Grants. In addition, various one-time funding to support learning recovery of SWDs because of the pandemic totaled \$828 million from various state and federal sources. Finally, the Supporting Inclusive Practices project received \$15 million over 3 years.

We do not have a specific proposal for how to create a more aligned system for integrating funding for SWDs into LCFF. We will leave the specifics to the various workgroups and research efforts. However, we recommend that whatever the specifics of the revisions to the funding formula, they must support the two guiding principles: (a) All students are general education students first, and (b) inclusive education is critical to improving education for SWDs. This is consistent with definitive research on the multiple benefits of inclusive education (Hunt & Farron-Davis, 1992; Hunt et al., 1994) and the 2015 California Statewide Task Force on Special Education (California Department of Education, 2015), which declared that all children and SWDs are considered general education students first and that all educators have a collective responsibility to meet the needs of all students.

The current funding system for SWDs is outside LCFF and tends to reinforce the notion that SWDs are separate from general education students. This results in many teachers turning over responsibility for SWDs to special education teachers, which can isolate SWDs. Further, the state's inclusion rate is below the national average and far below those states that have heeded the research and made inclusion a statewide priority (Humphrey et al., 2020). For that reason, our recommendation emphasizes both the creation of an aligned funding formula and a statewide commitment to inclusion.

Recommendation 3: Equitably Distribute Effective Teachers

Twenty-five years ago, the report of the National Commission on Teaching and America's Future (1996) declared that a caring, competent, and qualified teacher for every child is the most important ingredient in improving education. Teachers represent the largest single expenditure in a district's budget (Bruno, 2018), and how this critical resource is distributed makes it a fundamental part of a comprehensive effort to achieve equity. California has long struggled to provide students with equitable access to well-qualified teachers. Schools with high concentrations of socioeconomically disadvantaged students and students of color are often staffed with the least prepared and least experienced teachers or with those teaching outside their subject-matter expertise (California Department of Education, 2016). The state's teacher shortage, which has ebbed and flowed over the years, is likely to continue as long as the state relies on market forces to determine the supply and demand of teachers. The COVID-19 pandemic has exasperated teacher shortages as health and safety concerns resulted in early retirements and career changes (Carver-Thomas et al., 2021).

Recognizing the importance of teacher quality, the legislature included it as an LCFF priority. Under Priority 1, state law says that districts shall develop plans and be held accountable for how they ensure access to appropriately assigned and fully credentialed teachers (Local Control and Accountability Plans and the Statewide System of Support, 2013/2018). However, this component of LCFF has yet to be fully realized for two primary reasons.

First, the accountability system does not yet include data on teacher quality, although the Department of Education has, in recent years, cleaned and compiled data on teacher credentials and assignments in collaboration with the Commission on Teacher Credentialing, with plans to release the data publicly as early as 2021. Then education leaders and stakeholders will have the opportunity to determine if and how to integrate key teacher-quality indicators into the Dashboard, the system for monitoring teacher misassignments, and the broader System of Support.

Second, although LCFF equitably redistributes funding at the district level, it does little to address the inequitable distribution of effective teachers across and within districts. In part, this is because LCFF does little to guarantee equitable distribution of resources within school districts.

Fully credentialed and beginning teachers have long been maldistributed in California schools, with schools serving students in poverty, English learners, foster youth, and others most in need of effective teachers staffed by the highest concentrations of underqualified and beginning teachers. One of our interviewees told us:

You're going to have a long-term challenge in California if you don't deal with teaching staff. ... As long as you put your newest, least-experienced teachers in the lower performing schools and the most challenged schools, you're never going to really make a difference.

California policymakers have long been aware of this fundamental inequity. Past and some recent strategies have emphasized incentives to attract accomplished teachers to the lowest performing schools. For instance, the National Board for Professional Teaching Standards Certification Incentive Program, which was folded into LCFF in 2013, offered up to \$20,000 to teachers certified by the National Board who agreed to teach in high-priority schools.¹³ A largely identical version of this program was renewed in the 2021–22 budget (National Board for Professional Teaching Standards Certification Incentive Program, 2021). At various times over the decades, the state has provided grants and loan forgiveness to teacher candidates in exchange for their commitment to teaching in low-performing schools or hard-to-staff subject areas. Some of these incentives were also renewed in the 2021–22 budget: The Golden State Teacher Program will provide incentives for teachers to earn their credentials and work in a high-need field or school, and the Classified School Employees Credentialing Program will be extended so that more classified school staff can be supported to move into teaching roles. In addition, the 2021–22 budget includes funding and requirements for districts to improve staffing ratios in schools with higher concentrations of low-income and English learner students.

The state and local school districts have also pursued teacher residency programs, most recently in 2018 when the state authorized Teacher Residency Grants to support and expand LEA residency programs. In the late 1990s and early 2000s, homegrown efforts to support local teachers in earning National Board certification were notable, especially in LAUSD (Koppich et al., 2007). One analysis showed that LAUSD's support programs for National Board–certified candidates along with district and state financial incentives combined to make LAUSD the district with the most equitable distribution of National Board–certified teachers of any place in the country (Humphrey et al., 2005).

Policymakers should continue to support the implementation of these varied efforts. Further, they should develop goals for diversifying the teacher workforce and invest in efforts aimed at recruiting and sustaining a diverse teacher workforce, as research demonstrates that students fare better when taught by same-race teachers (Gershenson et al., 2017).

¹³ Information about this historical program is archived by the California Department of Education at cde.ca.gov/re/pr/nbptsci.asp.

Perhaps the best short-term strategy is to infuse proxy measures for “effective” teachers (like data on experienced, qualified, and appropriately assigned teachers) into state reports, each district’s and school’s Dashboard, and the System of Support. Transparency about the distribution of effective teachers could help incentivize districts to employ innovative strategies for better realizing equity.

At the same time, the people we interviewed pointed out that no one incentive strategy is likely to compel most teachers to move school sites and that the best solutions are to improve the working conditions in schools overall and ensure that schools serving concentrations of students with greater needs are well resourced. One interviewee said:

You’ve got to figure out: How do we structure the system so that teachers either want to go to hard-to-staff schools, or at least not object to them, or choosing with their feet ways to avoid them? I think the way to do that is to direct more resources for the school.

Our third main recommendation is for the state to improve the equitable distribution of teachers within districts. It can do this in three ways:

- Increase transparency regarding the equitable distribution of experienced, qualified, and appropriately assigned teachers in each district by building this information into state data reporting systems, including the Dashboard, and connecting it to the System of Support. Since work to report some of these data publicly is already underway, our recommendation is to continue that important work and also advance State Board of Education discussions about how to integrate those and potentially other teacher-quality data into the Dashboard and the System of Support.
- Continue policies and programs that incentivize accomplished and promising teachers to work in teams with principals eager to advance instructional practices in the highest need school sites. The 2021–22 budget includes \$250 million over 5 years to attract and retain highly qualified National Board–certified teachers to teach in high-poverty schools; this should be sustained, and incentives should be extended to teachers in other leadership networks, such as the Instructional Leadership Corps, Black Teacher Project, and subject-specific leadership groups.
- Provide promising practices and support to districts on how to improve working conditions, build local incentive programs, and negotiate labor agreements that collectively address the inequitable distribution of effective teachers.

Recommendation 4: Strengthen Transparency, Engagement, and Accountability

In 2019, the State Auditor rebuked the state for failing to collect sufficient data to allow stakeholders and policymakers to see how LCFF funds are spent (Auditor of the State of California, 2019). In our interviews, advocates and policy influencers agreed that the state should do more to increase transparency and oversight. Several called on the state to track unspent supplemental and concentration funds and improve the reporting of data on school site spending, with some also calling for the state to report supplemental and concentration grant expenditures at the school site level.

To address these challenges, the legislature adopted trailer bill language (Education Omnibus Budget Trailer Bill, 2021) aiming to close what some have dubbed the “carryover loophole.” In recent years, the state has also modified LCAP to improve the reporting of estimated and actual expenditures.

Still, some have argued that the new “carryover” language is riddled with complexities that will make it hard to implement or monitor,¹⁴ and some contend that the state has yet to tackle the reporting of school site expenditures or supplemental and concentration expenditures in a meaningful way. Although the California Department of Education recently posted data on school expenditures in compliance with a federal Every Student Succeeds Act requirement,¹⁵ the data are not very accessible to the general public and are not connected to LCFF. That is, the data do not report how much LCFF funding, much less how much supplemental and concentration funding, is spent at each school site.

Despite pressure from advocates to increase fiscal transparency and accountability, some district superintendents have argued that the reporting and compliance requirements of LCFF are burdensome and have urged the state to maintain maximum flexibility. Said one, “The supplemental and concentration’s starting to get a little bogged down. That’s starting to feel like a categorical, even though they haven’t gone that far yet.”

Given the legislature’s intent to increase and improve services for high-need students as well as to improve community engagement around district budgeting and decision-making, we find the calls for transparency reasonable and consistent with the intent of the law. In looking at LCAPs and financial data, we and other researchers and stakeholders have been hard-pressed to understand exactly how the money has been spent. At the same time, concerns about excessive reporting and compliance are also well founded. Nearly everyone we spoke

¹⁴ See, for example, the discussion from a California Practitioner Advisory Group meeting on August 20, 2021: <https://www.cde.ca.gov/be/cc/cp/cpag2021agendas.asp>.

¹⁵ The data is posted at <https://www.cde.ca.gov/fg/ac/es/essappedata.asp>.

with agreed that LCAP has become too long, is difficult to read, tries to serve too many purposes (including strategic planning, engagement, and accountability), and has become a compliance activity.

In addition, some people we interviewed expressed frustration that the student groups served by the supplemental and concentration grants are too narrowly defined, limiting the ability of districts to invest those funds in groups that may have particular needs in their community but are not low-income students, English learners, or foster youth. We are sympathetic to this concern, as there are indeed student groups—including Black students or other racial groups in some communities—who merit additional investment but have been largely ignored by LCFF. It may be time for California and other states to end the practice of assuming that poverty can serve as a sufficient proxy for most other forms of disadvantage, including systemic racial discrimination.

Finally, we heard repeatedly that district leaders and staff have been slow to grow their capacity to engage community members in budgeting and decision-making. Some felt that this is because it is easier to engage families around decisions and practices at the school site level than it is to engage them around district-level decisions.

To improve transparency, accountability, and engagement—while also respecting the principle of local control—we recommend the state do the following:

- Monitor whether the new carryover language does indeed ensure that unspent supplemental and concentration grant funds are used for high-need student groups in the following year.
- Improve stakeholder access to data on school site spending so that stakeholders can easily see how much each school is spending and from what revenue sources.
- Significantly streamline LCAP, give it a focused purpose, and increase district flexibility about how to write or compile these plans—perhaps on a pilot basis to start. Leverage technology to help make LCAPs more streamlined and easier for stakeholders to access and explore. Concurrently, improve annual standardized reporting of expenditures so that stakeholders can see how LCFF funds, including supplemental and concentration grants, have been spent.
- Consider amending state statute to allow districts to use supplemental and concentration grants to increase and improve services for both unduplicated students (as currently allowed) and student groups, not including special education students, who are the lowest performing in that district. This could make it easier for districts to use supplemental funds to increase and improve services for Black students,

Native American students, and/or other student groups that have unique needs but are not explicitly recognized by LCFF. This broadening of the allowable subgroups would have to be paired with clear state direction regarding allowable uses of funds.

- Fund efforts to strengthen community engagement in budgeting and planning. These might include (a) supporting or incentivizing districts and counties to partner with community-based organizations to strengthen family engagement and family relationships; (b) training school and district leaders on community engagement practices; or (c) piloting school-level budgeting efforts in order to strengthen family–school relationships, community engagement, and trust between families and schools.

Conclusion

What’s next for LCFF? Our interviewees believe that state leaders should maintain their commitment to the spirit of LCFF. But as the legislature, the governor, and the State Board of Education grapple with the pandemic as well as stubborn opportunity and achievement gaps, we suggest some ways to improve LCFF so that its initial goals can be more fully realized.

Our first set of recommendations includes ideas for modifying the formula, including changes to the supplemental and concentration grants; more funding for foster and homeless youth; and phasing out the TIIG, ERT, and MSA programs that have served as unnecessary and inequitable add-ons to LCFF.

But we also urge attention to a second set of recommendations, including three fundamental barriers to advancing equity: the siloed funding system that reinforces the isolation of SWDs and discourages inclusive education; inequitable distribution of effective teachers across and within school districts; and continued challenges with transparency and engagement.

Some of our interviewees pointed out that any legislative efforts to improve equity in LCFF must be complemented by broader policy changes designed to improve racial justice and eliminate institutionalized inequities in both schools and communities. The American Rescue Plan Act of 2021 and California’s enacted 2021–22 budget represent comprehensive strategies in this vein, with broad-reaching investments in neighborhoods, our youngest children, and low-income families. California’s Reparations Task Force may be yet another vehicle for tackling the broader impediments to racial equity, such as housing, health, poverty, access to early education, and environmental and institutional racism. In answer to our question about priorities, one of our interviewees declared: “It has to be broader than just K–12 policy. ... If we deal with it in silos, it suggests that K–12 can solve [equity] in a way that they can’t. It has to be integrated.”

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