From Policy to Plans
Supporting Students During COVID-19

Alexandria Hurtt
Sherrie Reed
Kramer Dykeman
Justin Luu

In the wake of COVID-19, the California legislature mandated that local educational agencies (LEAs) develop detailed Learning Continuity and Attendance Plans (LCPs) to address student learning and progress during the 2020–21 academic year. This brief summarizes results of an analysis of nearly 1,000 LCPs from public school districts across the state to understand how they intended to support students in critical areas like instruction, technology, assessment, attendance, and well-being. Overall, districts planned to provide technology, assess student learning, employ tiered levels of support, and prioritize services for special student populations. However, the practices described in the plans varied across districts, with the most notable differences between urban and rural areas. This analysis exposes broader opportunities for wide-scale reform in both education policymaking and implementation accountability postpandemic.

May 2022

PACE
Policy Analysis for California Education

Introduction

In spring 2020, the COVID-19 crisis completely altered schooling. Early uncertainties about the transmission of the virus, an urgency to act despite these unknowns, and the threats the pandemic posed to physical, economic, and social health were all underlying factors for the actions and decisions of policymakers and school leaders. In California, the emergence of the pandemic initially affected education continuity, with the sudden closure of schools and rush to meet students' basic needs (food security, for example) reflecting a concentrated effort to minimize harm across communities. Evidence indicates, though, that there was wide variation in how instruction was initially modified and delivered as well as in the supports made available to students across the state.[1]

As the public K–12 education system transitioned towards recovery, California Senate Bill 98 (SB-98)[2] introduced measures responding to the environment generated by the pandemic, mandating that local educational agencies (LEAs) outline their strategies to ensure learning continuity (in both remote and traditional classroom environments) and to provide students with access to academic and well-being supports during the 2020–21 academic year. Although recent work examines a limited number of these plans—formally known as Learning Continuity and Attendance Plans (LCPs)—to address specific questions,[3] the details within LCPs have yet to be explored statewide, concealing potential trends that may arise in local plans when traditional schooling is disrupted.

In this brief, which summarizes two interrelated research reports, we present selected results from the first comprehensive review of LCPs in California, highlighting the guidance that state-level policy presented to LEAs,[4] the extent that public school districts drew on this guidance in their planning documents, and the potential implications of these plans with the goal of understanding how the education system responds in an environment altered by crisis. Results indicate that districts' plans generally met the objectives outlined by policymakers, including accessibility of instruction and provision of technology, assessment and monitoring of student learning, tiered levels of support for engagement and social-emotional well-being, and prioritization of services for special populations of students. Findings also reveal a distinct contrast between urban and rural districts in their plans for education accessibility, programming, and support, suggesting a necessary focus on the resources and capacity of rural districts. However, LCPs do not convey how planned actions and strategies were implemented, nor was systematic monitoring mandated by the state, raising questions about the planning process and accountability for implementation of both LCPs and the ongoing Local Control and Accountability Plans (LCAPs).

This analysis highlights the practices that districts outlined in their LCPs, which were written during a period of uncertainty about schools reopening. Based solely on the plans made by local school districts, not their finalized actions or investments, the findings discussed in

this brief offer a unique snapshot of school district intentions at the time, including how these intentions were communicated to local stakeholders. To support future analyses of how these plans may relate to students' education trajectories and outcomes, all of the data are publicly available at edpolicyinca.org/publications/policy-plans.

California Context: Policy-Induced Planning

Although a key mandate of SB-98 was the completion of LCPs, similar state-directed local planning requirements have previously been in place in California. In fact, since the enactment of the Local Control Funding Formula (LCFF) in 2013, which altered how funding was allocated and the ways in which the state would support underperforming school districts,[5] public school districts, county offices of education, and charter schools in California have been required to submit LCAPs. These plans include short- and long-term goals: the actions and expenditures that LEAs intend to take to support students based in part on input from important stakeholders in the community (that is, parents and students), reflecting a bottom-up approach to accountability in that LEAs retain primary jurisdiction over decision-making.

However, as health guidelines shifted during the pandemic, so did state requirements; traditionally, LEAs are mandated to update and submit LCAP updates by July 1 each year, but amid school closures and health safety concerns, Executive Order (EO) N-56-20, signed in April 2020, extended the deadline for these updates to December 15, 2020, and directed LEAs to report any adaptations made to operations. Yet, rising concerns about student progress ushered in the adoption of SB-98 in June, which superseded EO N-56-20 and suspended LCAP updates. Instead, LEAs were required to complete and adopt LCPs by September 30, 2020, and publicly post plans to district or county websites,[6] consequently making LCPs available for data collection and analysis.[7]

LCPs mirror LCAPs in several key ways, including requirements to engage with community stakeholders and post plans publicly. SB-98 also required the State Board of Education to adopt an LCP template,[8] similar to the planning template for the LCAP, that was aligned with the state's education policy priorities. This template was made available to LEAs to record their plans.[9]

Research Approach

In an effort to understand fully the intended strategies and resources described in LCPs, we conducted an analysis of both the policy language and the district LCPs. First, we systematically analyzed the content of SB-98 to identify key policy changes explicitly tied to instruction or assessment for LEAs. Through document analysis,[10] we identified three primary policy goals: (a) ensure continuity of learning, (b) evaluate and support student progress,

and (c) address the tensions placed on student learning. We then reviewed and coded the LCPs from public school districts[11] to determine whether and the extent to which district plans aligned with each of these policy goals. Our analysis of LCPs draws on two primary samples and methods: (a) public school districts whose LCPs were machine-readable (N = 889)[12] and (b) unified school districts serving both elementary and secondary students in K–12 (N = 346).[13] Table 1 presents summary statistics for the samples across both phases of analysis.

Table 1. Demographic and District Characteristics Across Phases of LCP Analysis

	Statewide	Full LCP sample (Phase 1)	Unified districts (Phase 2)
Total number of school districts	1,025	889	346
Total enrollment	5,992,567	5,683,086	4,118,819
Percentage of total students enrolled	100.0	94.8	68.7
Race/ethnicity (percentage)			
Asian American/Pacific Islander	12.4	12.6	12.9
Black	5.2	5.1	5.7
Native American	0.5	0.5	0.4
Latinx	55.3	55.3	55.5
White	21.7	21.5	20.6
Multiple races	4.1	4.1	4.1
Race identification missing	0.8	0.8	0.8
Special population (percentage)			
English learners	17.7	17.8	17.4
Eligible for free or reduced-price meals	58.9	59.1	60.1
Geographic locale (percentage)			
Urban	16.0	15.4	17.1
Suburban	30.0	31.4	39.0
Town	16.7	16.8	21.1
Rural	34.3	33.6	22.8

Note. Data points calculated based on publicly available data sets from the California Department of Education (cde.ca.gov/ds/ad/downloadabledata.asp) and the National Center for Education Statistics (nces.ed.gov/programs/edge/Geographic/SchoolLocations).

Our analysis of LCPs also considered differences across key district-level demographics, including locale,[14] the percentage of students eligible for free or reduced-price meals (FRPM) under the National School Lunch Program (NSLP),[15] and the percentage of students in a district identified as English learners (ELs).[16] We focused on these characteristics given historic concerns about equitable access to resources for students in rural and less affluent areas.[17] Moreover, we examined district differences across the proportion of FRPM and EL students, as districts serving

greater populations of these students receive increased funding from the state through the LCFF.[18] To identify these differences, we conducted two-tailed *t*-tests that allowed for unequal variances to test whether observed differences were statistically significant. In all of the tables that follow we present unadjusted statistics that describe what we observe in LCPs and the differences we find across districts. It is important to note that many factors may contribute to these differences (for example, socioeconomic status of students, school board policies, teacher quality and training, technology infrastructure in the community, and so forth), which we do not account for in this analysis.

Findings

This brief links state policy objectives and local planning efforts during crisis, integrating selected results from both segments of analysis across several factors: instruction, technology, assessment, attendance, and well-being. First, we present a key goal outlined in SB-98, altogether describing three objectives identified within the policy. We then tie each policy objective to associated results from the multiphase analysis of LCPs to illuminate the features within districts' plans to support students' learning.

Goal 1: Ensure Continuity of Learning

Given the uncertainties related to student learning and progress during the early period of school closures, a clear goal of SB-98 was to ensure "continuity of learning" [EDC 43509(e)][19] by directing LEAs to outline their instructional plans in LCPs, including students' access to learning opportunities and the quality of these opportunities.[20] Therefore, one of the primary areas of focus within LCPs was instruction, particularly access. Results from public school districts reveal the design of flexible and strategic instructional plans as well as the prioritization of technological resources, suggesting access to instruction during the 2020–21 school year encompassed a spectrum of resources and logistical considerations beyond those for a traditional school year.

Method of instruction. District LCPs described *flexible and strategic instructional plans* to support students' learning. Findings reveal that distance learning plans were overwhelmingly included in LCPs, cited at similar rates both statewide and within unified school districts (see Table 2). Moreover, negligible differences across district characteristics indicate that all districts, to varying degrees, noted distance education in their plans, often describing the use of both synchronous and asynchronous learning. Specifically, results from unified districts show that while overall, both methods were noted at similar rates, synchronous instruction was cited slightly more often than asynchronous learning; however, for districts in urban areas with higher proportions of EL students, asynchronous instruction was more likely to be cited in LCPs. A possible explanation for this may lie in differentiation strategies, particularly for EL students, who could have received additional instructional support during periods when other students were working independently.[21]

Nearly all unified districts (96 percent) also included distance learning plans for specific student populations, with ELs at the forefront (95 percent) and more likely to be noted in the plans from urban, higher income districts. Despite this, LCPs lacked details about specific adaptations to instruction and services during distance learning, with limited evidence available about the extent to which the 2020–21 school year differed from educational programming prior to the pandemic. Moreover, some districts completely omitted plans for distance learning or described plans that relied exclusively on in-person instruction.

Table 2. Specific Strategies from District LCPs Related to Instructional Method (Percentage Reporting)

	Statewide	Unified districts									
		All	Rural	Urban	Diff.	Low FRPM	High FRPM	Diff.	Low EL	High EL	Diff.
Distance learning	98.0	98.8	98.0	99.0	0.7	98.0	99.5	0.7	98.7	99.0	0.7
Synchronous learning		99.4	98.7	100.0	0.7	100.0	99.0	0.5	100.0	99.0	0.5
Asynchronous learning		95.4	91.4	98.5	6.4***	95.9	95.0	0.5	93.3	96.9	4.1*
Specific plan for at least one student group		96.2	95.4	96.9	0.9	98.6	94.5	3.7**	99.3	93.8	5.0***
English learners		94.8	92.1	96.9	4.2*	98.0	92.5	5.0**	97.3	93.8	3.0
Youth in foster care		89.6	83.6	94.3	10.2***	90.5	88.9	1.1	90.0	89.7	0.2
Youth experiencing homelessness		86.4	78.9	92.3	12.3***	87.1	85.9	1.3	87.3	85.6	0.9
Migrant youth		6.4	5.9	6.7	0.8	6.1	6.5	0.5	0.7	10.8	10.4***
SED students		2.0	2.6	1.5	3.1	2.0	2.0	1.0	2.0	2.1	0.0
Students with disabilities		90.5	86.2	93.8	7.1**	93.2	88.4	4.3	91.3	89.7	1.2
N	889	346	152	194		147	199		150	194	

Note. EL = English learner; FRPM = free or reduced-priced meals; SED = socioeconomically disadvantaged. Statewide results are based on findings from automated word searches. For exact terms searched, see the appendix in the working paper (edpolicyinca.org/publications/policy-plans) associated with this brief. Differences represent unadjusted calculations between groups.
***$p < 0.01$. **$p < 0.05$. *$p < 0.1$.

Technological resources. Districts also prioritized *technological resources* to support engagement with instruction and ensure equitable access to distance education. Findings indicate that a majority of LCPs across California noted technological devices and an intention to improve (or an ongoing investment in) connectivity for students (see Table 3). In nearly every unified district, devices (for example, Chromebooks or iPads) or subsidies were offered, often in conjunction with one-to-one initiatives that would provide devices to all students. Relatedly, 98 percent of unified districts intended to offer support for internet services to students—including a range of options, such as hotspots (Verizon MiFi, for example) and Wi-Fi extenders—to improve instructional access. It is important to note, however, that the availability of these technological

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resources was at times uncertain, as the rapid shift to online learning caused an overall increase in device orders.[22] LCPs noted that back orders may have affected one-to-one initiatives, prompting device prioritization. In these cases, certain student groups were prioritized[23] to receive devices and connectivity supports in many unified districts, particularly those in urban areas.

Table 3. Specific Strategies from District LCPs Related to Technological Resources (Percentage Reporting)

	Statewide	Unified districts									
		All	Rural	Urban	Diff.	Low FRPM	High FRPM	Diff.	Low EL	High EL	Diff.
Technological devices	93.0										
Support or subsidy offered		99.4	99.3	99.5	0.0	100.0	99.0	0.0	100.0	99.0	0.0
Priority given in distribution		68.0	60.5	74.2	13.6***	67.3	68.8	2.0	70.0	67.0	3.4
English learners		49.3	45.4	52.6	7.1	44.9	52.8	8.3	51.3	48.5	3.2
Youth in foster care		61.7	52.6	69.1	16.5***	59.9	63.3	3.9	61.3	62.9	1.3
Migrant youth		9.2	9.9	8.8	1.2	9.5	9.0	0.4	10.0	8.8	1.3
Youth experiencing homelessness		39.5	33.6	44.3	10.8**	41.5	38.2	3.1	40.7	38.7	2.2
SED students		59.9	54.6	64.4	9.7*	60.5	59.8	0.4	66.0	56.2	10.3*
Students with disabilities		6.9	3.3	9.8	6.6**	8.2	6.0	2.1	6.0	7.7	1.7
Internet connectivity	92.0										
Support or subsidy offered		98.3	97.4	99.0	1.3	99.3	97.5	1.0	99.3	97.4	1.0
Priority given in distribution		73.8	68.4	78.4	9.8**	74.1	73.9	0.6	77.3	71.6	6.0
English learners		50.4	50.0	51.0	1.2	46.9	53.3	5.9	50.0	51.5	1.1
Youth in foster care		63.7	57.2	69.1	12.2**	62.6	64.8	1.6	62.0	66.0	3.4
Migrant youth		44.4	40.8	47.4	6.8	44.2	44.7	0.0	44.0	44.8	0.4
Youth experiencing homelessness		8.1	8.6	7.7	0.8	7.5	8.5	1.0	7.3	8.8	1.4
SED students		63.1	57.9	67.5	9.6*	63.3	63.3	0.2	68.0	60.3	8.0
Students with disabilities		6.3	6.6	6.2	0.4	5.4	7.0	1.6	5.3	7.2	1.8
N	889	346	152	194		147	199		150	194	

Note. EL = English learner; FRPM = free or reduced-priced meals; SED = socioeconomically disadvantaged. Statewide results are based on findings from automated word searches. For exact terms searched, see the appendix in the working paper (edpolicyinca.org/publications/policy-plans) associated with this brief. Differences represent unadjusted calculations between groups.
***p < 0.01. **p < 0.05. *p < 0.1.

Goal 2: Evaluate and Support Student Progress

While efforts were made across the state to ensure minimal interruption to students' learning, missed instructional time (whether in person or remote) may have negatively affected student's academic progress in spring 2020. This possible "learning loss" [EDC 43509(f)(1)(A)] was a particular policy concern in SB-98. For this reason, in their LCPs, LEAs were directed to (a) assess potential gaps in students' learning as a result of COVID-19, specifically in English language arts (ELA), English language development (ELD), and mathematics; (b) address these gaps by describing strategies to ensure progress; and (c) gauge the effectiveness of these strategies.[24] To this end, in addition to instructional supports, LCPs from public school districts noted the use of data from multiple assessments to evaluate students' progress. Although plans outlined clear purposes for these data, such as identifying students' strengths, adjusting instruction, and informing stakeholders, at the forefront of these was using assessments to measure students' academic development.

Assessment administration. LCPs outlined *holistic assessment plans* that incorporated multiple measures to assess students' academic progress, including (a) diagnostic (to determine prior knowledge and skills), (b) formative (to monitor learning as it occurs), and (c) summative (to evaluate what has been learned). Statewide evidence indicates that most school districts highlighted formative (87 percent) and diagnostic (64 percent) assessments in their plans (see Table 4). Moreover, these assessments received more detail in LCPs, perhaps in response to grading changes at the end of the prior academic year that potentially concealed students' academic growth; therefore, knowledge of student progress was of even greater importance for the 2020–21 academic year, cementing the use of assessments to diagnose and understand students' standards-level development. Additionally, fewer than half of all public school districts (46 percent) referenced summative assessments, which may reflect the state's suspension of standardized testing due to the uncertainties introduced by COVID-19.

Table 4. Specific Strategies from District LCPs Related to Assessment (Percentage Reporting)

	Statewide	Unified districts									
		All	Rural	Urban	Diff.	Low FRPM	High FRPM	Diff.	Low EL	High EL	Diff.
Assessment administration											
Assessments listed		93.9	94.1	93.8	2.0	91.2	96.0	1.2	90.7	96.4	4.6**
Grade level		51.4	40.1	60.3	24.1***	53.7	49.7	8.7	48.0	54.6	3.9
English learners		81.8	73.0	88.7	13.0***	83.7	80.4	2.5	74.0	88.7	13.0***
Youth in foster care		59.2	53.9	63.4	9.7*	57.1	60.8	2.9	54.7	62.9	7.7
Youth experiencing homelessness		45.4	40.8	49.0	7.6	44.9	45.7	0.6	43.3	46.9	3.4
Migrant youth		2.0	0.7	3.1	2.4*	3.4	1.0	2.4	2.0	2.1	0.1
SED students		59.0	57.2	60.3	3.1	58.5	59.3	0.8	55.3	61.3	6.0
Students with disabilities		53.2	39.5	63.9	24.4***	54.4	52.3	2.2	51.3	54.1	2.8
Type of assessment											
Diagnostic	64.0										
Formative	87.0										
Summative	46.0										
N	889	346	152	194		147	199		150	194	

Note. EL = English learner; FRPM = free or reduced-priced meals; SED = socioeconomically disadvantaged. Statewide results are based on findings from automated word searches. For exact terms searched, please see the appendix in the working paper (edpolicyinca.org/publications/policy-plans) associated with this brief. The findings for EL-specific assessments exclude the state-mandated English Language Proficiency Assessments for California (ELPAC). Differences represent unadjusted calculations between groups.
***$p < 0.01$. **$p < 0.05$. *$p < 0.1$.

Assessment plans were also differentiated across student groups, particularly for ELs. Eighty-two percent of unified districts highlighted how ELs' academic progress would be determined, with urban districts and, unsurprisingly, those districts with higher proportions of EL students about 13 percentage points more likely to list the specific assessments that would be administered. In fact, beyond assessments mandated by the state,[25] districts planned to draw on a range of strategies to evaluate EL students, including embedded assessments from the curricula of major publishers, such as Wonders (McGraw-Hill); student writing samples; and tools to assess oral language skills (for example, the Student Oral Language Observation Matrix).

Goal 3: Address the Tensions Placed on Student Learning

Given the health and economic concerns ushered in by the pandemic, learning may have taken a back seat to more pressurizing events in the community. The text of SB-98 accounted for this, directing LEAs to support students' well-being and describe the resources each would offer "to address trauma and other impacts of COVID-19" [EDC 43509(f)(1)(E)] in their plans. These underlying factors may have also affected students' attendance and engagement in school. Although access to and the quality of learning opportunities are paramount, the frequency with which students are able to (or are choosing to) access these opportunities is central to continuity of learning and gauging students' progress. A higher rate of absenteeism may suggest a greater gap in students' standards-level progress. Therefore, SB-98 also required LEAs to develop tiered reengagement strategies, including how districts would reach out to students and families to address student absence.

LCPs from public school districts thus considered how the COVID-19 crisis affected students outside of academics, with some noting the challenges students experienced the prior spring, such as feelings of social isolation and concerns about contracting the virus. Moreover, plans reflected the continuing impact of the pandemic on students' attendance and well-being, defining student-centered supports around reengagement as well as mental and social-emotional health.

Attendance and engagement. LCPs described *diverse monitoring plans* for attendance that included students' presence and participation as evidence. Across all school districts, 44 percent specifically included attendance monitoring in their plans, most of which were unified districts (see Table 5). Moreover, while nearly all unified districts intended to track attendance during synchronous instruction, a majority (74 percent) also noted asynchronous work would be used, underscoring the prevalence of both methods and the subsequent flexibility incorporated into LCPs.

In addition to monitoring attendance, SB-98 mandated that districts develop tiered strategies for reengagement. Although statewide, 59 percent of LCPs described more intensive reengagement strategies, which included referrals to attendance review boards, these strategies were typically relegated to Tier 3—the highest tier level—to support students with chronic absenteeism. In fact, unified districts described strategies for Tier 1 (87 percent) and Tier 2 (81 percent) at marginally higher rates than for Tier 3 (69 percent), suggesting early intervention strategies were prioritized. Tier 1 strategies often involved initial teacher and/or staff attempts to contact students' families, while Tier 2 strategies included outreach by site attendance teams, weekly or daily check-ins, matching students with a mentor, or home visits, among other actions.

Table 5. Specific Strategies from District LCPs Related to Attendance and Well-Being (Percentage Reporting)

	Statewide	Unified districts									
		All	Rural	Urban	Diff.	Low FRPM	High FRPM	Diff.	Low EL	High EL	Diff.
Monitor attendance	44.0	98.8	98.0	99.5	0.7	98.6	99.0	0.5	99.3	98.5	0.5
Synchronous instruction		92.2	90.8	93.3	1.7	91.8	92.5	0.3	91.3	93.3	1.1
Asynchronous work		74.1	69.1	77.8	8.6*	73.5	74.4	0.6	70.0	77.3	7.2
Engagement strategies											
Tiered levels of engagement described		88.8	84.9	92.3	6.3*	91.2	87.4	2.8	89.3	88.7	0.8
Tier 1		86.7	83.6	89.7	4.5	88.4	85.9	2.2	88.7	85.6	3.9
Tier 2		81.3	76.3	85.6	7.6*	83.0	80.4	3.5	82.0	80.9	2.9
Tier 3		68.6	63.2	73.2	8.7*	70.1	67.8	3.0	70.0	68.0	3.5
Intensive reengagement strategies	59.0										
Mental health services	90.0	95.1	92.1	97.4	3.5	96.6	94.0	1.2	94.7	95.4	1.1
Access to school counselors		76.7	70.4	81.4	10.1**	82.3	72.4	9.4**	77.3	76.3	1.3
Mindfulness practices	42.0										
Social-emotional learning	82.0										
Instructional time		82.4	77.0	86.6	8.4**	84.4	80.9	3.0	82.0	82.5	0.1
Wellness monitoring	28.0										
N	889	346	152	194		147	199		150	194	

Notes. EL = English learner; FRPM = free or reduced-priced meals. Statewide results are based on findings from automated word searches. For exact terms searched, please see the appendix in the working paper (edpolicyinca.org/publications/policy-plans) associated with this brief. Differences represent unadjusted calculations between groups.
***$p < 0.01$. **$p < 0.05$. *$p < 0.1$.

Student well-being. LCPs also described resources and programs to support *students' well-being*, including both mental and social-emotional health.[26] Evidence indicates that across California, school districts overwhelmingly cited mental health services in LCPs (see Table 5), such as the use of mindfulness practices or days dedicated to student wellness. Moreover, while 77 percent of unified districts' plans indicated that students would have individual access to school counselors, these supports were more likely to be present in urban, higher income areas.

Enfolded within districts' plans to support well-being was also a focus on social-emotional learning (SEL). Statewide, 82 percent of districts noted SEL in their LCPs; however, less than a third (28 percent) cited plans to monitor wellness through surveys or universal SEL screeners, such as CoVitality. Districts also intended to determine social-emotional support needs in other

ways, including online referral systems as well as device (such as GoGuardian) and social media monitoring tools (such as NewDawn) that would alert staff if students explored content related to mental health or suicide ideation. Moreover, SEL supports were often blended within instruction; 82 percent of unified districts outlined distance learning schedules that devoted instructional time specifically to SEL, usually organized around a specific curriculum (such as CharacterStrong).

Implications and Policy Considerations

This brief summarizes key findings from an extensive analysis of policy and local plans developed during the COVID-19 crisis. Broadly, the evidence suggests that state education policy at this time reflected a holistic view of student learning, including how it should be measured and supported, as well as the challenges to doing both during the pandemic. Results also indicate that, in general, districts' plans met the objectives outlined by policymakers. The majority of districts developed plans to make instruction accessible, provide technology, assess student learning and monitor academic progress, employ tiered levels of support, attend to social-emotional well-being, and prioritize services for special populations of students. Despite these intentions, results from this analysis suggest that education leaders and policymakers should bear the following recommendations in mind.

Focus on rural districts. Findings reveal a distinct contrast between urban and rural districts across nearly all areas of analysis, including assessment plans, family outreach, and access to counselors, with urban areas indicating these in their plans at significantly higher rates. These differences may be the result of multiple factors, such as an intention in rural districts to spotlight districtwide actions in LCPs (excluding more localized plans) or inequities that existed prior to the pandemic; for example, rural districts often face staffing challenges,[27] which potentially placed greater strains on staff during distance education. As internal capacity and, more broadly, the availability of adequate resources could limit the strategies and actions rural districts may be able to take, education leaders should remain cognizant of these challenges and consider what direct supports would best serve these students and schools. Further, it is still unclear whether the patterns we observe in LCPs more generally reflect those recorded by districts in their LCAPs or outline a set of strategic plans that are altogether unique to the context of the pandemic; the flexibility of districts to respond to a rapidly evolving crisis and shifting expectations may be an important factor in the emergent differences between rural and urban districts.

Consider alternatives to standardized assessment. Because SB-98 mandated districts to evaluate potential gaps in student learning, LCPs placed considerable emphasis on diagnostic and formative assessments, suggesting that educators planned to pay careful attention to how students were progressing throughout a nontraditional school year. Moreover, at the time of publication, the state's annual testing program had been suspended for two years,[28] and as COVID-19 continues to change instructional plans,[29] it is unclear how testing will evolve postpandemic.

Given that assessment results are a key input in various federal and state-level accountability measures, along with the uncertain future of widespread, reliable testing data—in the pandemic context—to support the efficacy of these systems, statewide and national accountability efforts could consider alternative or supplementary ways to examine how districts and schools are meeting students' academic needs. This could include public reporting of alternate or interim assessment results, which may more readily measure academic progress over time. As districts continue to monitor attendance and engagement, such information can also offer critical context about learning opportunities across the state.

Reimagine the strategic-planning process. Although LCPs reflected policy objectives, few districts outlined specific, detailed plans to support students, including those from special populations, across the aforementioned themes. This may reflect either the fluctuating circumstances and continual sense making district and school leaders were (and still are) operating in due to the pandemic or the planning tools associated with district LCPs, either in form or function. For example, although school districts were not required to use the template, except to incorporate "all of the information [it] specified" [EDC 43509(e)], nearly all public school districts in our analysis (99.4 percent) used the LCP template. District plans created with the template directly aligned with the priorities outlined in SB-98; however, the use of a structured document for planning may have also affected the shape and form of the plans themselves. Regardless, this limited detail conceals many of the critical elements that make up the learning context for students, raising questions about the planning documents and process that are key elements of the LCFF. Without including specific information about the strategies that a district plans to implement, it is difficult to isolate the later actions and investments that may have helped (or hindered) student progress. To this end, establishing a recordkeeping process that supports the curation of detailed district intentions is essential so that education leaders can make informed decisions about resources and the need for additional supports.

Monitor implementation of plans. Presently, no mechanism exists within the state to examine critically the implementation of planned activities outlined in LCPs (or in districts' standard planning document, the LCAP), limiting awareness of the specific strategies enacted at the local level to support student learning from year to year. As plans are typically considered in relation to their application, this prompts the need for a system in which districts reflect on their actions (in terms of personnel and financial investments) in contrast to those they intended to put into practice so they can understand (a) why plans may have changed and (b) how future policy could better support districts across the state in securing and supporting their needs.

Reflection

These findings expose the broader opportunities for wide-scale education reform and innovation that have emerged from the pandemic.[30] As a crisis can have both undesirable and desirable outcomes, it creates a turning point during which opportunities can emerge to

transform a system, such as education. Although school districts' plans did reflect policy, more transformative changes are required to recognize both the local and the larger needs of schools across the state as the COVID-19 crisis continues to affect education. Education leaders should thus, where feasible, amplify changes in resources and routines that implementation has revealed can best support students and school communities at large, seizing upon opportunities to rebuild a more equitable system. Moreover, policymakers should consider the changes made by educators and administrators and work towards the development of a system that would enable districts, particularly those in rural areas, to better communicate changes to their operational plans as well as their need for additional (or alternative) resources.

Endnotes

1 Hurtt, A., Cohen, K., & Reed, S. (2021, March). *Early pandemic response in California: Identifying the structural and instructional changes in K–12* [Report]. Policy Analysis for California Education. edpolicyinca.org/publications/early-pandemic-response-california

2 Education finance: Education omnibus budget trailer bill, S.B. 98 (2019–2020), Chapter 24 (Cal. Stat. 2020). leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB98

3 Gao, N., Hill, L., & LaFortune, J. (2021, April). *Distance learning strategies in California schools.* Public Policy Institute of California. ppic.org/wp-content/uploads/distance-learning-strategies-in-california-schools-april-2021.pdf; Romero, K. (2021). *Rising to the challenge: Districts innovating to address equity across Los Angeles County.* The Greater LA Education Foundation. greaterlaedfund.org/wp-content/uploads/2021/03/GLA-rising-to-the-challenge-031921-Single.pdf; Williams, C. P., & Buenrostro, M. (2021, March). *Teaching and learning during uncertain times: A review of learning continuity and attendance plans*. Californians Together. californianstogether.org/lcpreport

4 LEAs include public school districts, county offices of education, and charter schools. This report specifically examines the plans developed by public school districts across California.

5 Bruno, P. (2018). *Getting down to facts II: District dollars 2: California school district finances, 2004–5 through 2016–17* [Technical report]. Policy Analysis for California Education. gettingdowntofacts.com/publications/district-dollars-2-california-school-district-finances-2004-5-through-2016-17; Koppich, J. E., & Humphrey, D. C. (2018). *Getting down to facts II: The Local Control Funding Formula (LCFF): What have we learned after four years of implementation?* [Technical report]. Policy Analysis for California Education. gettingdowntofacts.com/publications/local-control-funding-formula-lcff-what-have-we-learned-after-four-years

6 California Department of Education. (n.d.). *Learning continuity and attendance plan.* cde.ca.gov/re/lc/learningcontattendplan.asp

7 At the time of primary data collection, which occurred in October 2020, LCPs were still housed across LEA websites. Most LCPs are now linked at the California Department of Education website: cde.ca.gov/re/lc/calcplinks2021.asp

8 California Department of Education. (2020, July). *Learning continuity and attendance plan template (2020–21).* cde.ca.gov/re/lc/documents/lrngcntntyatndncpln-template.docx

9 SB-98 noted that while LEAs were not required to use the template, LCPs needed to include "all of the information [it] specified" [EDC 43509(e)].

10 Bowen, G. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal, 9*(2), 27–40. doi.org/10.3316/QRJ0902027

11 Public school districts in this analysis refer to elementary school, high school, and unified school districts.

12 In Phase 1, automated word counts were conducted across five themes: instruction, technology, attendance, assessment, and well-being. Although some searched terms also appear in template headings and/or directions, results do not include these mentions.

13 Data collection tools, organized across the themes previously identified (instruction, assessment, technology, attendance, and well-being), were used by teams of undergraduate research assistants to code LCPs collaboratively. During the coding process, intensive training and weekly meetings safeguarded consistency within groups and ensured consensus.

14 The locale of a district is defined by the National Center for Education Statistics at the Institute of Education Sciences, U.S. Department of Education, and is a measure of location based on data from the U.S. Census Bureau and determined by population size and distance from an urban center.

15 The NSLP uses family income levels to determine eligibility for students to receive free or reduced-price lunch. For this analysis, districts in which more than 55 percent of students are eligible for free or reduced-price lunch are considered low-income districts.

[16] For the purposes of this analysis, low EL districts are those in which fewer than 13.21 percent of students are ELs, a cutoff based on the median proportion of English-learning students included in the sample.

[17] Reardon, S. F., et al. (2018). *Getting down to facts II: A portrait of educational outcomes in California* [Technical report]. Policy Analysis for California Education. gettingdowntofacts.com/publications/portrait-educational-outcomes-california; Showalter, D., Hartman, S. L., Johnson, J., & Klein, B. (2019). *Why rural matters 2018–2019: The time is now.* Rural School and Community Trust. files.eric.ed.gov/fulltext/ED604580.pdf

[18] Bruno, 2018.

[19] For this and subsequent references, see the cited section of the California Education Code (EDC) at leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=EDC&tocTitle=+Education+Code+-+EDC

[20] For more detailed results, including a systematic examination of policy measures, see Hurtt, A., Reed, S., Dykeman, K., & Luu, J. (2022). *Policy and planning in the midst of crisis: Supporting student learning during the COVID-19 pandemic* [Working paper]. Policy Analysis for California. edpolicyinca.org/publications/policy-plans

[21] For a detailed examination of how districts intended to support EL students in particular during this period, see Reed, S., Hurtt, A., Hibel, J., & Garrett, D. (2022). Serving English learners during the COVID-19 pandemic [Report]. Policy Analysis for California Education. edpolicyinca.org/publications/serving-english-learners-during-covid-19-pandemic

[22] Rauf, D. (2020, April 16). Coronavirus squeezes supply of Chromebooks, iPads, and other digital learning devices. *Education Week*. edweek.org/education-industry/coronavirus-squeezes-supply-of-chromebooks-ipads-and-other-digital-learning-devices/2020/04

[23] In this analysis, "prioritization" is defined as a district's intent to provide a student group with preliminary or preferential access to resources.

[24] Funds were also provided to districts for activities that would directly support student achievement and "mitigate learning loss related to COVID-19 school closures" (SB-98 § 110[d]), such as extending the instructional school year or offering supplementary support services.

[25] California presently mandates the ELPAC in grades K–12 for students whose primary language is a language other than English. The ELPAC consists of two exams: one that initially identifies students as ELs and an annual summative assessment to measure students' progress.

[26] Districts also outlined a range of supports for students in addition to mental and social-emotional health, including check-ins around potential academic, technological, and physical needs, along with the creation of new programs.

[27] Goldhaber, D., et al. (2020). Teacher staffing challenges in California: Examining the uniqueness of rural school districts. *AERA Open*, *6*(3), 1–16. doi.org/10.1177/2332858420951833; Nguyen, T. D. (2020). Examining the teacher labor market in different rural contexts: Variations by urbanicity and rural states. *AERA Open*, *6*(4), 1–24. doi.org/10.1177/2332858420966336

[28] In spring 2020, standardized testing (for example, the California Assessment of Student Performance and Progress), primarily measuring students' academic progress in math and ELA in Grades 3–8 and 11, was cancelled in California. In spring 2021, districts were given the option to forego administering standardized tests if a similar substitute was available and administered uniformly across a grade, school, or district, with 18 of the state's 25 largest school districts opting to offer alternative tests. See Johnson, S. (2021, May 4). Hundreds of thousands of California students won't take statewide standardized tests this spring. *EdSource*. edsource.org/2021/hundreds-of-thousands-of-california-students-wont-take-statewide-standardized-teststhis-spring/654123

[29] Nierenberg, A. (2021, December 22). Can schools handle omicron? *The New York Times*. nytimes.com/2021/12/22/us/can-schools-handle-omicron.html

[30] Myung, J., et al. (2021, May). *Restorative restart: The path towards reimagining and rebuilding schools* [Report]. Policy Analysis for California Education. edpolicyinca.org/publications/restorative-restart

Author Biographies

Alexandria Hurtt is a postdoctoral scholar with the California Education Lab in the School of Education at the University of California, Davis.

Sherrie Reed is executive director of the California Education Lab in the School of Education at the University of California, Davis.

Kramer Dykeman is a postdoctoral scholar in the School of Education at the University of California, Davis, and has worked with the California Education Lab since 2016.

Justin Luu is a doctoral student in School Organization and Educational Policy at the University of California, Davis, and a member of the California Education Lab.

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Related Publications

Reed, S., Hurtt, A., Hibel, J., & Garrett, D. (2022, May). *Serving English learners during the COVID-19 pandemic* [Report]. Policy Analysis for California Education.

Hurtt, A., Reed, S., Dykeman, K., & Luu, J. (2022). *Policy and planning in the midst of crisis: Supporting student learning during the COVID-19 pandemic* [Working paper]. Policy Analysis for California.

Hurtt, A., Cohen, K., & Reed, S. (2021, March). *Early pandemic response in California: Identifying the structural and instructional changes in K–12* [Report]. Policy Analysis for California Education.

Myung, J., et al. (2021, May). *Restorative restart: The path towards reimagining and rebuilding schools* [Report]. Policy Analysis for California Education.

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