The Early Implementation of California's System of Support

Counties, Differentiated Assistance, and the New School Dashboard

Daniel C. Humphrey
Jennifer O'Day

December 2019

LCFFRC

Local Control Funding Formula Research Collaborative

The Early Implementation of California's System of Support: Counties, Differentiated Assistance, and the New School Dashboard

Daniel C. Humphrey, Independent Consultant
Jennifer O'Day, American Institutes for Research

With major assistance from
Eupha Jeanne Daramola, Nina Houghton, Magaly Lavadenz,
Julia Koppich, Julie Marsh, Haley Nelson,
David Plank, Laura Stokes, Laura Tobben, and Tara Vahdani

LCFFRC
Local Control Funding Formula Research Collaborative

Acknowledgements

Executive Summary

California's new Statewide System of Support is grounded in the fundamental principles of the Local Control Funding Formula, especially its emphasis on the central role of local educators in determining the best approaches to improvement. This report examines the early implementation of the System of Support, with a focus on the work of the county offices of education (COEs) and the experience of the districts identified for differentiated assistance.

COE and district officials held positive views of the key shifts in the System of Support, particularly the emphasis on support over compliance and the empowerment of local districts as decision makers in their own improvement efforts. However, COEs differed in the definitions of their role in this new system, depending on the contexts in which they worked. These definitions ranged from being the main source of assistance on all challenges facing their districts, to being a thought partner primarily for implementing improvement processes, to brokering sources of support beyond the COE where COE capacity was insufficient to meet district needs. COEs in our case studies had made significant efforts to boost their internal capacity to support their districts and had worked to break down internal silos between various departments. Nonetheless, while officials in our case study districts appreciated the efforts of their COEs, many experienced the support as less than adequate to address their challenges. Both COE and district officials raised concerns about the under-resourcing of the support system.

A major influence on the effectiveness of the System of Support is the Dashboard. Districts are identified for differentiated assistance based on their performance on the Dashboard, a measurement tool that employs multiple indicators and disaggregates the performance of student subgroups. While interviewees found the Dashboard an improvement over the previous single-measure Academic Performance Indicator (API), they expressed numerous concerns. Among these were that the Dashboard undermines the focus needed for sustainable improvement and generally fails to provide data that are sufficiently timely, valid, and comprehensible to guide improvement. In addition, respondents expressed concerns about the equitable distribution of support and the truncated timeline for assistance.

The System of Support is a notable effort by the state to reinvent accountability aligned with the principles of the Local Control Funding Formula. However, it is not yet fully a system, as it is under-funded, fails to draw upon the full range of expertise in the state, and is not well-aligned with other accountability components of the Local Control Funding Formula. The report concludes with five recommendations designed to make the System of Support a more robust and comprehensive system to realize the aspirations of the Local Control Funding Formula.

Introduction:
A New Role for County Offices of Education

The Local Control Funding Formula (LCFF), passed by the California Legislature in 2013, brought more than a new way to fund K-12 education in the state. It also altered the institutional landscape in education by creating a new state agency — the California Collaborative for Educational Excellence — and engendering changes in the roles of existing agencies, particularly county offices of education (COEs). These changes, along with the funding formula itself, were intended to support both equity and system improvement to better serve all of California's young people. To the COEs went the new responsibility of annually approving their districts' Local Control Accountability Plans (LCAPs), in which districts outline their intended activities and resource allocation strategies to meet the eight state priorities delineated in the LCFF legislation.[1] Also implied in this role was a more supportive function for COEs: to help districts create LCAPs that would meet the requirements and achieve the goals of the LCFF.[2] Early reports suggested that COEs took up this supportive role to varying degrees.[3]

Then, in 2017, the counties' support function was ratcheted up significantly with the implementation of a new accountability system and Statewide System of Support. Counties were now to be the first line of support for districts identified as needing "differentiated assistance" based on the state's multiple-indicator California School Dashboard. This report examines how COEs are interpreting and acting on their role in the new System of Support, how those actions are influenced or constrained by state policy design and implementation as well as by local context, and how districts are experiencing and responding to differentiated assistance from their county offices. Our intent is to report emerging patterns and challenges from the system's first two years in order to suggest possible refinements in design and implementation.

---

[1] The priority areas outlined in the LCFF legislation are 1) basic services (such as appropriate assignment of teachers), 2) implementation of the state content and performance standards, 3) parent involvement, 4) student achievement, 5) student engagement, 6) school climate, 7) access to a broad course of study, and 8) other student outcomes.

[2] Throughout this report, our focus is on districts as the primary target of support. Technically, Local Education Agencies (LEAs) include school districts, charter schools, and county offices of education, and any of these may be the recipients of differentiated assistance (note that charters are not in the System of Support until this school year). Our interest, however, is in the COE-to-district support relationship.

[3] Humphrey, D.C., and Koppich, J.K. (November 2014). *Toward a Grand Vision: Early Implementation of California's Local Control Funding Formula.* Stanford, CA: Policy Analysis for California Education. Access at https://edpolicyinca.org/publications/toward-grand-vision-early-implementation-californias-local-control-funding-formula.

Study Methodology

This is the sixth in a series of reports produced by the LCFF Research Collaborative, a collection of researchers from six organizations and institutions who have been studying LCFF implementation since 2013. This multi-method study draws on data from multiple sources:

- Reviews of state and COE documents and district LCAPs and Dashboards,
- Interviews with 20 state-level actors (policy makers, agency leaders, and advocates) (Fall 2018)
- A survey of 46 COE superintendents in a meeting of the California County Superintendents Education Services Association (CCSESA) in January 2019 (and previously in October 2017) and a separate survey of 72 other leading COE administrators in CCSESA's Curriculum and Instruction Steering Committee (CISC) in May 2019.
- Case studies of five COEs and 14 districts they serve, for a total of:
  - 50 interviews with COE officials and
  - 111 interviews with district (and school) leaders.

COE case studies were geographically distributed and represented both urban and rural settings (one in the rural north, one in the Central Valley, one in the Bay Area, two in southern California (both coastal and inland)). Sampled districts had all been identified for differentiated assistance in either or both 2017 and 2018. Site visits occurred in spring 2019 (April through June). Analysis took place through summer 2019 and included a two-day cross-site analysis research team meeting and multiple rounds of feedback during the drafting of the report.

What is the Statewide System of Support?

To understand the evolving role of the COE requires an understanding of the intent and structures of the new Statewide System of Support, which is itself intended to function as part of a much larger, more comprehensive and coherent system to improve outcomes for all students, while reducing disparities between targeted groups.[4] In the words of a state policy actor who has been instrumental in the design of the new approach:

---

[4] The LCFF targets additional funding to districts and other local education agencies to increase or improve services to four traditionally underserved groups: low-income students, English learners, foster youth, and homeless youth. In addition, the accountability Dashboard disaggregates school and district data not only for these students but also for ethnic/racial groups and students receiving special education services.

This is a system designed to support the ongoing implementation of the Local Control Funding Formula and the different pieces that go with it, [including] the work of the Local Accountability Plan development, approval, and review and the Dashboard… so it's not the System of Support on its own; it's all part of the accountability structure.

Within that structure, the stated goal of the System of Support is "to help local educational agencies (LEAs) and their schools meet the needs of each student they serve, with a focus on building local capacity to sustain improvement and to effectively address disparities in opportunities and outcomes."[5]

Levels of Support

To accomplish that goal, system designers delineated three intended levels of support, consistent with the structure laid out in the LCFF legislation:

- **Support for all LEAs and schools (Level 1):** an array of resources and voluntary assistance that all LEAs may use to improve student performance at the LEA and school level and narrow disparities among student groups across LCFF priorities.
- **Differentiated assistance (Level 2):** individually designed assistance for LEAs to address identified performance issues for all students and for identified student groups.
- **Intensive intervention (Level 3):** for LEAs with persistent performance issues over a specified time period.[6]

COEs are involved in both Level 1 and Level 2 supports, but much of the attention has been focused on their unique role as the first line of support for districts identified for differentiated assistance (DA). COEs must offer that assistance to a school district if any student group within that district does not meet performance standards for two or more LCFF priority areas, as reported through the district's Dashboard.[7] According to the July 2017 memo to the State Board of Education: "The consistent approach to assistance should focus on supporting LEAs and local stakeholders to identify the underlying cause of the challenges and identifying options for addressing that underlying issue."[8] While the district is not required to accept the assistance offered by the county, the COE must

---

[5] https://www.cde.ca.gov/sp/sw/t1/csss.asp

[6] Level 3 supports have not yet been implemented.

[7] California Education Code (EC) Section 52071(c).

[8] California State Board of Education, "Developing an Integrated Statewide System of Support for Local Educational Agencies and Schools: Proposed Goals and Characteristics of an Integrated System and Regional Structure for Providing Coordinated Support Across State and Federal Programs." Item #2, July, 2017, https://www.cde.ca.gov/be/ag/ag/documents/agenda201707.pdf

make it available. Significantly, "each of the three levels of support represents a *type of assistance* available or provided to LEAs, not a status or label applied to LEAs."[9] This is one of several key shifts in the approach to accountability and support in the state.

Intended Shifts in the New State Accountability and Support System

The new approach to accountability in California has been described by state leaders as "radically different" from what came before.[10] Based on our review of state documents and our discussions with state policymakers, we have identified five intended shifts in the new accountability model that distinguish it from prior approaches:

- **From a focus on schools to an emphasis on LEAs (districts) as the unit of change.** Integral to California's new accountability and support system is an emphasis on districts as not only targets for but also the key actors in improvement efforts. This district-centric focus is a departure from prior accountability systems that centered on identification of and support for individual schools. Consistent with Every Student Succeeds Act (ESSA) regulations, California continues to identify persistently low-performing schools for improvement, but the primary means through which the state supports their progress is by mobilizing and supporting their LEA. According to a June 2017 State Board of Education memo, "LEAs play the essential role in supporting schools to sustain improvement."

- **From punitive accountability to an emphasis on support and continuous improvement.** Prior accountability structures under the No Child Left Behind Act (NCLB) and the California Public School Accountability Act (PSAA) have been criticized as trying to blame and shame schools and districts into improvement.[11] But commandments and threats have proven ineffective in fostering ownership and positive change, especially when individuals and systems lack the capacity to identify, understand, and address their underlying problems. The new System of Support is based on a different model that privileges capacity building and partnerships over command and control.

- **From compliance to local decision-making based on local needs.** Consistent with the LCFF is the new system's incorporation of local control in the design

---

[9] See description of California's Statewide System of Support on the CDE website at https://www.cde.ca.gov/sp/sw/t1/csss.asp

[10] Interviews with multiple state policy makers.

[11] Past state and federal laws based accountability on numeric indexes of student achievement, the Academic Performance Index (API) and Annual Yearly Progress (AYP) respectively. Consequences – such as removal of staff or governance changes – ensued for schools or districts that did not meet the required academic targets set by the state or federal governments.

and implementation of assistance. Not only are districts to be the target of help, but they are also the intended decision-makers about the nature of the support they receive. As one state policymaker explained:

The whole premise of the design of our system now is that people have to own their problems and take responsibility for them at the local level... We're trying to shift it to being more of a partnership [between COEs and districts] to figure out the root causes and address them in the most effective way.

- **From a single criterion or index to a multiple-indicator Dashboard covering a broad range of outcomes aligned to the state's eight priority areas.** The new system has moved from a blunt identification and labeling approach to a more fine-grained monitoring of multiple indicators to allow for identification and targeting of specific areas and specific student populations. The designers believed that in this way, and with the inclusion of local as well as state indicators, assistance can be more responsive to the needs of local districts and communities.

- **From redundant and contradictory state and federal accountability programs to one coordinated and coherent system.** California's new approach to accountability and support, as described in the state's approved ESSA plan, represents an attempt to integrate federal and state accountability policies.[12] In addition, coordination among the various agencies within the state has also been stepped up as responsibilities have been clarified and explicit avenues for communication and coordination have been established.

New Roles and Agencies Within the System of Support

To operationalize these shifts and expand the types and quality of supports available, the state has created new roles and actors to support capacity-building and improvement at all levels. Particularly important among the new actors are the nine Geographic Lead county agencies, whose responsibility it is to build the capacity of other COEs in their geographic area, coordinate assistance across the area, and provide differentiated assistance to a school district if that district's COE is unable to do so.[13]

---

[12] The current ESSA plan is the product of extended negotiations between state policy makers and the US Department of Education to address several fundamental differences between the state and federal laws (e.g. district vs. school as the unit of accountability, single index vs. multiple indicators for identification of need).

[13] There are seven geographic areas across the 58 counties. Lead responsibility for each of two of these areas is shared by two Geo Lead agencies.

In addition, to address the deeply troubling Dashboard results for students with disabilities, the state has created seven new leads among the Special Education Local Plan Areas (SELPAs).[14] There are also expert leads in topical areas (like mathematics or English learners) as well as a lead partnership responsible for identifying and spreading effective models of community engagement. Coordination among these leads is shared by the California Collaborative on Educational Excellence (CCEE) and the California Department of Education (CDE).[15] Though not a state agency, the California County Superintendents Educational Services Association (CCSESA) has also played an important role in guiding and supporting COEs in their provision of differentiated assistance.

How are County Offices of Education and the Districts Enacting and Responding to the Statewide System of Support?

A major goal of this study was to understand what actions county offices of education are taking to implement differentiated assistance, as well as how the affected districts were experiencing the support. Five central findings emerged from our investigation.

1. Both COEs and Local Districts Appear to be Embracing the New Accountability and Support Narrative

On the surveys administered to COE leaders as part of this study, 94 percent of county superintendents and an equal percentage of assistant superintendents[16] agreed or strongly agreed that "The state's new System of Support is a step in the right direction."

Our case study COE respondents echoed this perspective. Across our five counties, their descriptions of the support system and of their work in it mirrored the shifts in approach outlined above, particularly the emphasis on local decision-making and responsiveness to local conditions as well as the move towards a more supportive rather than punitive approach to accountability. Typical of the responses was that of one county improvement team member: "The shift, to me, has been to instead of telling people what to do, how can you facilitate the autonomy for them to do better?" Another contrasted the current approach with the former accountability system:

---

[14] See box "Students with Disabilities (SWDs) and the System of Support" for additional details.

[15] It is important to note that to date the System of Support is comprised only of public agencies, though districts are free to seek support from nonprofits and others that they deem most relevant to their needs.

[16] For ease of reference, we refer to the second group of survey respondents as assistant superintendents. Most were in this role in their COE, but there were also a few department directors in the group.

Local control is really powerful... they [districts] can do things that they've known they needed to do for years, but would never have had the permission in the old accountability system. But with the ability to make local decisions on things that have been identified publicly and with them they have the backing of the community. I think it's very powerful.

This shift from telling to enabling has been reflected in COEs' efforts to help districts establish a continuous improvement process, informed by a CCSESA-developed guidance document and tools for DA.[17] Thus, shortly after the release of the Dashboard data in late fall 2018 (or 2017), all case study COEs had sent a letter to each district identified for DA offering COE support. This initial overture was followed by meetings with the districts (individually and sometimes collectively) to analyze each district's data to determine the root causes of one or more of the performance issues revealed on the district's Dashboard. The process generally concluded with the COE providing a summary of the data and conclusions along with information about available resources.

Often when the COE staff arrived at the initial meeting with the district, they had already conducted a preliminary exploration of the district's data. The root cause analysis was then a collaborative process to "dive deeper" into the information to uncover the underlying issues. For example, in one district the analysis of the data for students with disabilities (SWD) and the questions posed by the COE staff revealed an underlying lack of systems such as Student Support Teams, tiered interventions, or systematic data reviews to identify and meet the needs of these students. Through this process, explained the COE administrator working with this district, "they started looking into their systems, which then started driving them back to first best instruction, which then drove them into other arenas of the work. What you saw was a slow accumulation of systems being built to better support their students."

To enable this work, case study COE staff across the board emphasized the importance of building positive relationships with their districts as the foundation for providing meaningful support. They stressed the need to establish trust by assigning individual staff members to each district on an ongoing basis and by learning as much as possible about what the districts were doing, including what they were doing well. Said one COE administrator, "It's about relationships... so part of the whole System of Support is to learn as much as we can [about our districts]."

---

[17] Definitions of and approaches to continuous improvement vary, but at its most basic, continuous improvement focuses on a well-defined aim and on reducing variation in performance towards that aim. It involves investigation of the systemic causes of the identified problem and a disciplined cyclical process of developing, testing, and refining potential solutions that can then be implemented broadly to improve performance across the organization or system. The CCSESA tools and guidance draw largely on processes developed by the Carnegie Foundation for the Advancement of Teaching and by county superintendents.

For their part, district respondents in each of the five case study counties overwhelmingly acknowledged and appreciated what they perceived as a positive shift in their COEs' approach to accountability and assistance, consistent with the intent of the System of Support policy. Typifying these sentiments were the following comments from district administrators:

> We're fortunate that the county doesn't come in and try and tell us what to do… There aren't a whole lot of silver bullets out there. We're trying to address our specific issues, but I feel the county works with us… Districts in [this county] absolutely get the support they need without them trying to come in and tell us how to do it.

> Right now, I see it as a kinder and gentler approach to school improvement… Now you are not on an island by yourself. You have a support team. And the root cause analysis helps to get to the problem.

2. District Respondents Were Not Universally Enthusiastic About the Usefulness of their County's Support

In one of our sampled counties, COE administrators stated that they had engaged in a root cause analysis with all of their eligible LEAs, but our three sampled districts reported difficulty in recognizing it as such. Said one local administrator, "[The COE] did have a conversation with [us], but I wouldn't describe it as a root cause analysis." In two other counties, some district respondents felt that the process simply hadn't gone far enough or hadn't pushed their thinking beyond what they were already able to do on their own. In one case, the district team had analyzed their own data and come up with a plan, which, in their final meeting with the COE, county staff had simply handed back to them along with their original raw data, a nod of approval, and a request for permission to use the plan as a model for other districts. The local administrators did not find this conclusion to the process particularly helpful. Said one, "That is not what we needed. We need your [the county's] level of expertise!" District staff contrasted their COE's approach to that of an external nonprofit provider with whom they had been working over the previous year. This external provider had consistently challenged district staff to go deeper into their data and consider alternative explanations or strategies.

In a third county, district leaders indicated that while the data review with COE staff had been helpful, their process had failed to move beyond the initial root cause analysis to explore specific levers and strategies to address the identified problems. "It felt like we started a process and then it just stalled," said one administrator. Added another, "Not getting to the change ideas and drivers was a little frustrating for me as a participant… [The county] has a very light touch. I think in one meeting we even acknowledged that

there was no plan for action."

One explanation for the limited depth — mentioned by COE and district respondents alike — was the short timeframe for DA, from the release of the Dashboard results in December to the COE's report back to the district by May. We delve into this timing problem more deeply in our discussion of the Dashboard. Another factor, also discussed below, was the varying capacity of COE staff in districts' identified areas of need. Finally, several respondents pointed simply to the newness of the system and of the COEs' emerging role within it. As one district respondent put it, "This has shifted to an openness to try to work with each other. But I think we're all getting our sea legs a little bit in terms of 'what does this mean'?" Several COE respondents voiced similar patience even when noting implementation shortcomings and glitches in the state system. Said one county superintendent, "I'm not sure if the current [accountability system] is there yet, but I think it's definitely a step in the right direction. It's a huge system that I think just needs patience and support."

3. COEs Varied Substantially in Their Interpretations of the COE Role Within the System of Support

Despite the surface similarity of COE actions to implement DA, deeper discussions with the leaders in our case study counties revealed considerable variation in their conceptualizations of the goal of differentiated assistance and their role within it. These conceptualizations were strongly (and often explicitly) related to the COE leaders' and staff members' assessment of the overall county context (e.g., size, urbanicity, social and economic conditions, and reform history), the level of capacity within the COE relative to the needs of their districts, and COE leaders' beliefs about the change process. We highlight this variation because COE perspectives on the goals of DA and their role within it influenced the ways that counties organized and staffed the work with their districts and could, if studied further, provide lessons about the kinds of support that are more effective or less effective in different contexts. At the same time, such differences — while perhaps responsive to local context — could also have implications for equity among districts across the state in the nature and level of support they receive, especially if approaches in some counties prove more effective and districts in other counties simply do not have access to those supports. For this reason, such variations in county approach and impact will be important to monitor over time. Three examples help to illustrate the range of COE approaches to their role.

County A: The COE as a one-stop shop for DA. In this approach to differentiated assistance, the role of the COE is both to support the development of continuous improvement processes (e.g., root cause analysis, Plan-Do-Study-Act cycles) in eligible districts *and* to provide professional development and other direct services in particular content areas (such as middle-grades mathematics, early literacy, or special education)

identified through their Dashboard results. One of our sampled counties was particularly illustrative of this approach. In this county, each COE team working with one or more DA districts is led by an improvement science coach who is deeply steeped in the principles and processes of continuous improvement, having trained under the tutelage of Carnegie Foundation staff over the course of two years (training that was funded through outside grants prior to implementation of the System of Support).

Beyond the continuous improvement process, this COE also serves as *the* provider of professional development and other support in this isolated rural county. Given the small size of the districts in the county and their general isolation, there is little incentive for outside providers to invest the time and resources that would be necessary to address the significant educational needs deriving from the deep levels of poverty in the region. To fulfill this substantive assistance role, county leadership has both recruited new staff and encouraged the development of existing staff in most of the topical areas relevant to their districts. One reported advantage of this dual role is that the COE is able to take a longer view of differentiated assistance than we saw in most other counties. Work in the first year of DA is thus designed to be methodical and deep to ensure that district staff understand the problem(s) they seek to address. The COE then builds on the foundation laid in year 1 to help the districts implement and refine the change strategies they have developed. We should note, however, that while this COE took the long view and saw DA as an ongoing process, the volatility of the Dashboard with respect to which of its districts were identified for DA, and for which student groups, made that approach more difficult to implement, especially for small districts. (See box on small districts and the discussion of Dashboard volatility below.)

County B: The COE as a thought partner for continuous improvement and culture change. A second approach to differentiated assistance focuses on the processes of root cause analysis and continuous improvement, leaving the actual solutions to identified problems of practice primarily up to the districts. One COE in our sample had determinedly adopted this approach: "[Our role is] asking 'critical questions' so the district can develop a strategy to address the issues." Leadership in this COE believes that DA is not about bringing expertise on specific subject matter or populations (e.g., special education or homeless youth); there are many other resources to which the districts in this primarily urban and suburban county can turn for such substantive help. Rather, these county leaders believe that DA needs to be organized around facilitating district staff to see the big picture, engage in self-reflection, develop an understanding of their own data, and create strategies to solve their own problems. In this way, districts will "break their compliance mindset" and build the capacity to tackle complex issues that include but extend well beyond those for which they are identified for DA. As the superintendent remarked, "We can't do DA for districts; we can only provide the process." This COE's emphasis on expertise in systems analysis and change management is reflected in their recruitment and training of staff providing DA.

County C: The COE as both service provider and broker. A third approach to differentiated assistance arose in one of our sampled counties that had a very large geographic dispersion of high-needs districts, limited capacity in the COE to address them all, and access to at least some external groups willing to work with districts in the larger metropolitan areas. In this situation, the COE adopted an explicit brokering approach. COE staff worked with districts on the initial root cause analysis and also provided direct services in the areas in which they have expertise in-house. They then helped districts connect with other sources of assistance as needed and available. As one COE administer explained, "We will outline and define what we know we do well and then [are] willing to broker services in the areas that we know we would love to go deep in but we just don't have the capacity and personnel on staff."

This explicit brokering role is evident in the approach that County C has taken to allocating the additional support dollars it receives from the Budget Act of 2018.[18] Because the COE has been able to build up a substantial dedicated LCFF fund that can cover the basic cost of the root cause analysis phase of DA, all these additional monies (approximately $4 million) can go to support the *actions* that the districts decide to take up based on that analysis.[19] As the assistant superintendent

Survey Results: Brokering Support is Gaining Popularity

The notion that a viable approach for COEs is to serve in part as a broker, connecting districts with outside resources (County C), is one that seems to be picking up steam. In January 2019, 48 percent of COE superintendents surveyed for this study agreed or strongly agreed with the statement: "COEs should help districts identify underlying causes of performance problems and then connect them to sources of high-quality expertise and assistance, wherever it comes from." This was up from 18 percent of respondents answering the same question in October 2017. Meanwhile, only 23 percent of other surveyed COE administrators — those more directly involved in the work with districts — agreed with the superintendents on this question. This may indicate a perceived pressure by those closer to the ground to try to meet all their districts' needs in-house.[20]

---

[18] Recognizing that differentiated assistance is "new" work for COEs, the Budget Act of 2018 included additional allocations to COEs to support district improvement efforts. This includes a flat $200,000 for each COE serving districts eligible for differentiated assistance, and variable funding based on the number of small, medium, and large districts in the county identified for DA.

[19] This COE's efforts to build a dedicated fund for LCFF implementation had been both strategic and long-range. These efforts involved taking advantage of additional monies coming into the county due to state equalization, reallocating other COE budgetary resources towards LCFF support, and protecting the fund in the face of competing demands and budgetary constraints. Sustained commitment by COE leadership was essential.

[20] Plank, D., Humphrey, D.C. & O'Day, J. *The Changing Role of County Offices of Education: Survey Results.* Policy Analysis for California Education. December 2019. Access at https://edpolicyinca.org/publications/changing-roles-county-offices-education-survey-results.

explained, "The districts make requests of certain amounts of money to pay for key activities or training or technical assistance that they felt would be most useful to them… We worked with them to be sure it made sense and that their requests were aligned with the LCAP, but it's their judgment." The COE then contracts with the outside provider the district has selected and ensures that the services are delivered as promised.

4. COE Capacity Remains a Concern Despite Efforts to Increase COE Effectiveness

Perhaps the most controversial and yet pervasive question about the design of the Statewide System of Support has been its reliance on the COEs as the first line of support for districts identified for differentiated assistance. Central to this concern among stakeholders has been the observation that COEs differ significantly with respect to their ability to meet the many and varied needs of their districts. County leaders themselves are aware that the shift in their role places new demands on their staff and agency organization. In essence, COEs are being asked to reinvent themselves, which requires considerable attention to internal capacity building. For this reason, all case study COEs had actively taken steps to build their capacity through training and hiring staff and through restructuring their organization.

COE efforts to increase staff expertise through training and recruitment. COE staff have sought and received training in continuous improvement processes or systems analysis. In one case, the leads for each of the DA teams had participated in 24 days of improvement science training over a two-year period with the Carnegie Foundation for the Advancement of Teaching. This extended period allowed staff to deepen their understanding of improvement methods through an iterative process of study and application. Lead staff in other counties also reported receiving some — though generally far less extensive — training on root cause analysis and other aspects of continuous improvement, provided either by the Carnegie Foundation (through CCSESA) or WestEd. Most COEs had also recruited new staff to address substantive gaps in their expertise. Two case study counties were recruiting heavily at the time of our visit; the others had previously made significant staffing changes. One county (County C above) had done no recent recruitment but stretched their ability to support their districts by connecting them with expertise and sources of assistance outside the COE.

Implementation of cross-functional teams to improve coordination and effectiveness. In addition to staffing changes, all the case study COEs had internally restructured to increase effectiveness and improve their relationships with districts. Each was using cross-functional teams as an integral part of their DA work, although composition of the teams differed across the counties. In two COEs, the structure for DA was simply an extension of the one they had developed for the LCAP, with particular COE staff being assigned to work with a set of districts on an ongoing basis. Staff in these

COEs explained that this approach allowed them to get to know the districts' work more deeply, establish relationships with district staff, and link the differentiated assistance process more directly with LCAP development.

Regardless of team genesis, all COEs reported an intentional fluidity to staff participation in the DA teams in order to respond to particular needs of the districts, such as data analysis, special education, school climate, or curriculum. One COE administrator noted:

We created [the improvement teams] but the goal was to have representation from different groups and it kind of evolved as we started... When [the district] chose a focus, we would change our groups sometimes to make sure we had county-level expertise in that area of focus.

Sometimes, however, this fluidity may have been too pronounced. In one of the COEs, the size of the overall DA team and the complexity of assigning staff to districts (coupled with COE staff turnover) left districts unsure about who their main county contact for DA even was.

Survey Results: COE Self-Assessments

Given the focus on continuous improvement training, it is not surprising that survey responses from both county superintendents and assistant superintendents reported this to be an area of relatively high capacity in their COEs. Asked to rate on a scale from 1 (lowest) to 10 (highest), how prepared their county was to provide assistance in district-level root cause analysis, 80 percent of superintendents rated their COE at level 7 or above. This was substantially higher than their self-ratings in any other area. Using the same threshold of a 7 rating or higher, only 57-61 percent of superintendents gave their counties high marks for expertise in other key areas, including aligning instructional practice with standards, reducing chronic absenteeism and suspensions, improving graduation rates, and data systems and data analysis. Moreover, at or near the bottom of the self-ratings were two areas particularly relevant to the System of Support: evaluating the efficacy of interventions (an important aspect of continuous improvement) and building district structures to support school improvement (an underlying justification for using districts as the unit of change in the accountability system). These came in at 40 and 49 percent respectively.[21]

---

[21] Plank, D., Humphrey, D.C. & O'Day, J. *The Changing Role of County Offices of Education: Survey Results.* Policy Analysis for California Education. December 2019. Access at https://edpolicyinca.org/publications/changing-roles-county-offices-education-survey-results.

District perceptions of COE capacity. Our data suggest that district perceptions of the usefulness of DA was strongly conditioned on their perceptions of the capacity of their COEs to understand and effectively respond to the needs and challenges of their local district. In two of our sampled counties, perceptions of both capacity and usefulness were almost uniformly positive. In the two counties in which districts were least sanguine about differentiated assistance, however, concerns about COE capacity were central:

> *I have to be honest, I do not call them. Individuals at the county office are very nice, but some of the information I have received from them has been inaccurate. They are accessible, they want to talk. But a lot of their answers are, 'Let me get back to you.'*

> *I would say they don't have the capacity... They have some pretty good people... but it's going to take an outside agency to help in that area.*

Perceptions of county capacity varied *within* as well as across counties. More specifically, we observed that even when faced with similar performance challenges, districts within the same county often had quite different perceptions of their county's ability to assist them. Two main factors appeared to influence this variation in district perceptions: the district's size and/or level of capacity and its prior experience with continuous improvement.[22]

Influence of districts' size and capacity. We observed that in these five counties, the larger and/or higher-capacity districts often had more internal and external resources to draw on than did their COEs. Some of these districts appeared to find limited added value from the short sessions on root cause analysis with county staff. One district superintendent expressed this perspective clearly: "I don't think the county has any particular skill set we don't have internally." In contrast, some of the smaller, more isolated, and lower-capacity districts relied on the support they received from their county offices, and at least one COE in our sample tended to focus their attention and resources on these smaller districts. This suggests that the System of Support as currently designed may be more relevant for the 40 percent of small districts across the state for whom the county provides the main source of intellectual and professional challenge and support.[23] (See Small School Districts box.)

---

[22] Note that we had no independent means of assessing the actual capacity of COE staff, so we focus here on district staff perceptions.

[23] "Currently, about 40 percent of public school districts in California are "small" (serving fewer than 1,000 students), and about 10 percent of all districts are "very small" (serving fewer than 100 students)." https://lao.ca.gov/reports/2011/edu/district_consolidation/district_consolidation_050211.aspx

Influence of districts' prior experience with continuous improvement. In addition to overall district capacity, the degree to which districts have had prior exposure to and involvement in continuous improvement processes seems to have played a significant role in their receptiveness to county assistance. At least six of our sampled districts had been previously (and in some cases, were currently) involved in continuous improvement collaborations with other districts and external partners prior to the implementation of differentiated assistance. These districts had already analyzed many of their data and may even have gone through several Plan-Do-Study-Act (PDSA) cycles of inquiry and improvement around an identified problem of practice. So to the extent that their COE presented a process that started again at square one, it may have seemed like a waste of time that would not move the district beyond what they had already learned and accomplished. Some called the process "duplicative" or "repetitive" and thus of less value. The words of one district respondent were echoed by many others: "We feel like we are getting more from working with other districts with like needs than we have from the county." This pattern has several implications: 1) COEs should tailor their approach to DA to not only the Dashboard data but also the varied experiences of the districts, including their prior knowledge of continuous improvement processes; 2) the most beneficial assistance for some districts may be to continue the work they are already doing in outside partnerships, and this work should be encouraged and supported financially.

5. Both COE and District Respondents Raised Concerns about the Under-resourcing of the Support System Relative to the Needs in their Districts

Included in the design of the new system were monies to support COEs in helping their identified districts. The amount of these funds varied by the size of the DA-eligible districts, ranging from $100,000 to $300,000 per district, and were available for use at the discretion of the COE. With the exception of County C above, all other COEs in our sample used their DA funding to pay for the root cause analysis process and to offer scholarships for — or a specified number of days of — county-led professional development. Two COEs also provided a small stipend ($35,000 to $75,000) directly to districts to use for improvement actions of their choice (aligned to the LCAPs).

Overall, however, there was a consistent recognition in the districts and the counties that there were just too few additional funds to support the needed improvement. Said one district respondent, "With the API... if you were in improvement there was money. Here with the Dashboard, it is really about improvement, and I am excited about that. The issue is that there is no money." Our surveys of county administrators suggest that COE staff share a similar financial concern about the new system. When asked, 77 percent of county superintendents and 61 percent of assistant superintendents disagreed or strongly disagreed with the statement "Our COE has adequate funding to implement the System of Support in the districts in my county." Indeed, the funding to fuel improvement efforts

appears even smaller when considered in light of the emerging economic climate facing many districts today, as the superintendent of one of our case study counties pointed out:

> *The first few years of local control [were spent] restoring the programs they had had to cut... The next two years I started to see some really creative ideas and things moving forward that could have really made some impact. And then all of that was put on a halt with the pension increases.[24] So, districts are really losing now. They don't have the resources to continue their efforts because these new expenses are draining their budgets... You can build a great model, but if you don't have the means to execute, you don't get anywhere with that model.*

In addition, when defining resources to include supports beyond money, both COE and district officials reported that they were unclear about the roles of the CDE and the CCEE in the System of Support. As a result, our interviewees did not view these state agencies as important resources on which to draw for improvement.

District and county practitioners also raised concerns about other issues that they perceived as beyond their control but that greatly influence the potential success of the System of Support. These include the timing of the various components of the system (particularly the LCAP and the Dashboard), aspects of the Dashboard design, and the overall insufficient state infrastructure to address problems in special education. We discuss these concerns below, focusing on the design and implementation of the Dashboard, which triggers differentiated assistance.

The Dashboard and the System of Support

The implementation of the Statewide System of Support — particularly with respect to differentiated assistance — occurs largely through the actions and interactions of COEs and their districts, albeit with help from an expanded set of other state agencies. We have noted previously how local context and capacity influence the decisions that county and district actors make in the definition and exercise of their roles. Equally important, however, are the ways in which the broader policy context facilitates or constrains their support and improvement efforts. As one state policymaker told us, the System of Support was built to support and be integrated with all the elements of the LCFF. "It's all part of the accountability structure."

---

[24] For an examination of the impact of the pension increases on districts in California, see H. Melnicoe et al., *The Big Squeeze: How Unfunded Pension Costs Threaten Educational Equity.* https://www.pivotlearning.org/wp-content/uploads/2019/05/the-big-squeeze-report-april-2019.pdf.

A core element of that larger structure is the Dashboard, the intended purpose of which is not only to identify districts that are eligible for DA but also to provide evidence of progress and help ensure attention to targeted student groups and to state priority areas. In this study, therefore, we sought to understand how counties and districts are interpreting and using the Dashboard to guide improvement efforts. How was the Dashboard helping them focus on key problem areas and populations? How was it helping them to understand the systemic patterns underlying those problems and to test out and refine solutions based on evidence?

Unlike the previous system, the Dashboard rejects the assumption that schools and districts can be judged by a single number. As described earlier in this report, the Dashboard measures districts and schools' performance based on academic outcomes, attendance, suspensions and expulsions, college and career education, graduation rates, and English learners' progress, along with a variety of local indicators that address the state priorities.

County Office and District Officials Have Embraced the Dashboard as an Improvement

COE superintendents, staff, and district officials appear to hold positive views of the new Dashboard as an improvement over the previous measures of school and district performance. Our survey of COE superintendents and COE staff serving on the Curriculum and Instruction Steering Committee (CISC of CCSESA) showed strong support for the new System of Support, and our interviews with COE superintendents and staff and district superintendents and staff also revealed generally positive views of the Dashboard.

While we heard some concern that the complexity of the Dashboard was a barrier to parents' and other stakeholders' understanding of district and school performance, recent changes to the Dashboard's presentation were generally seen as an improvement. A typical assessment from a district superintendents was: "I actually think the Dashboard has a lot of promise." As one principal said:

> For the first time in my career, finally the data feels like a true representation of our school. The Dashboard allows you to see the growth and positive areas, in addition to bad areas. For example, we're doing a great job in CCR [College and Career Readiness], but you never would have seen that before the Dashboard.

Perhaps the most notable feature of the Dashboard that garnered support from district and COE officials was its ability to identify the performance of student subgroups across multiple indicators. In particular, many of our interviews reported that the Dashboard has shone a bright light on the poor performance of students with disabilities.

As one COE official told us, "The boundaries have come down… students with disabilities are seen as everybody's students… because of the Dashboard and DA." (See Students with Disabilities box).

Voters' and parents' responses on a recent poll conducted by PACE suggest that more work is needed to increase Dashboard awareness among the public, although those somewhat familiar with the newer version of the Dashboard have generally positive assessments of it. In 2019, 46 percent of voters and 63 percent of parents reported general awareness of the Dashboard, but only 9 percent of voters and 19 percent of parents reported that they knew a lot about it.[25] At the same time, among those respondents who were shown the old version and the new version of the Dashboard, 65 percent of voters and 81 percent of parents expressed a positive impression of the new version.

Both COE and District Officials Pointed to Problems with the Dashboard that Constrain or Undermine the Effectiveness of the System of Support

Educators generally appreciated the Dashboard as a more accurate measure of performance; however, they expressed numerous concerns about some features of the Dashboard. Our interviewees argued that the problems with the Dashboard actually impeded the successful implementation of the System of Support. These problems result in disincentives to mount a sustained improvement strategy; the lack of timely, valid, and comprehensible measurement to guide improvement efforts; concerns about the equitable distribution of support; and a truncated timeline for improvement efforts.

The Dashboard's Multiple Indicators and Volatility Undermine the Focus Needed to Sustain Improvement

Too many priorities. Many of our interviewees argued that the state established too many priorities for districts to address simultaneously. As a result, the Dashboard can identify a district for DA due to the performance of one among many subgroups across any two of the six priorities currently measured. A common concern articulated by one COE superintendent was: "The priorities are indigestible because there are just too many of them." This observation echoes the findings from the recent report by Fullan, Rincon-Gallardo, and Gallagher (2019). As they reported:

In the coming years, the number of districts identified for differentiated assistance, and the areas where they will require support might increase

---

[25] Polikoff, M. S., Hough, H., Marsh, J. A., Plank, D. N. (2019, February). *Californians and Public Education: Views from the 2019 PACE/USC Rossier Poll.* Policy Analysis for California Education. Access at: https://edpolicyinca.org/publications/pace-and-usc-rossier-polls-2019

Students with Disabilities and the System of Support

The 2018 Dashboard identified 374 districts eligible for differentiated assistance; 243 of those were identified because of the poor performance of their students with disabilities (SWDs). Although the numbers were lower in 2017, the pattern was the same, prompting our case study counties to take steps to increase their internal expertise to help their districts better serve this population of students. Meanwhile, the state has established seven lead agencies among the Special Education Local Plan Areas (SELPAs) to share expertise and build capacity across all SELPAs in both system improvement and various content areas.

Despite these actions, our study respondents raised many concerns about how the System of Support can address the needs of SWDs. We found widespread disappointment among state, COE, and district officials about the lack of progress since the 2015 Report of California's Statewide Task Force on Special Education. The Report called out issues regarding early learning, classroom practices, educator preparation and professional learning, assessment, accountability, family and student engagement, and financing. The Task Force made concrete recommendations in an effort to create one system to serve all students, but only marginal policy changes addressing the needs of SWDs have been enacted. As one policymaker explained: "I feel like special ed is a wing of the house that nobody's opened the door to in a long time... It's always felt like the stepchild of the system."

In addition to the many seemingly intractable problems articulated by the Task Force report, COE and district respondents responsible for SWDs also noted increases in the number of students needing social and emotional support and students on the autism spectrum. Some warned of the unintended consequences of the recent increase in compliance reporting and the lengthening of Individual Education Plans (IEPs). As one official argued, "The paperwork documentation in the special ed world from IEPs and these audits... It's going to crumble the whole system." Others focused on the shortage of special education teachers (especially in the rural districts), although some argued that the problem was that credentialed special education teachers often move to regular teaching assignments due to the burdens of the job.

Our case study COEs were working to address these issues by helping their districts examine their systems and develop more efficient and effective approaches. But COE officials readily admitted that their efforts cannot begin to address the fundamental structural problems districts face in addressing the multiple challenges of educating their students with disabilities. To the state's credit, AB 75 requires a number of actions to improve planning, coordination, and the delivery of services for SWDs. The Dashboard results have shone a spotlight on California's failure to adequately address the needs of our students with disabilities, but it will take system transformation at all levels to significantly improve both opportunities and outcomes for this large and diverse population of students.

at a faster pace than the system can respond. This creates the risk of scatter. Eight state priorities are too many. Adopting multiple measures and reporting results by student group were important steps, but the accumulation of new constituents for each state priority can create incoherence and confusion.[26]

Other COE and district superintendents reinforced this finding. As one COE superintendent stated, "...the districts' resources are finite and so are ours. So how do you make the choices about what to emphasize? ...it is really too many things to focus on at one time and do it thoughtfully."

One leading advocate and observer we interviewed concurred with this assessment. As he argued, "We prioritize too many things. ...I would say we need to create three indexes. ...Just create one that's academic, one that is a social-emotional learning (SEL). ...and one that is equity."

The eight priorities are important to the state and none of our informants suggested that they were not. The informants did argue, however, that COEs and districts could use more flexibility to focus on a fewer number at a time.

Multiple indicators, not multiple measures. California policymakers are rightfully proud of moving beyond the single numerical measure of school and district performance (the Academic Performance Indicator (API)). We found general support for the new measurement system among COE and district leaders, but also heard concerns about the misuse of the term "multiple measures" when describing the Dashboard. As one union official noted, teachers' perspective on what constitutes multiple measures is very different from the state's use of the term:

...in education, what that [multiple measures] means is you have multiple indicators for a single thing. I have multiple ways to identify how my students are doing in reading comprehension. But what the state did was they picked multiple areas [for which] to have single indicators. ... it causes people to overly simplify what the problem is and, based on the oversimplification of the problem, overly simplify the solution.

Several of our interviewees agreed that the Dashboard can appear to be six APIs rather than the kind of multiple measures teachers typically employ in their teaching. While the state's move to multiple indicators has been welcomed as a clear improvement over

---

[26] Fullan, M., Rincon-Gallardo, S., Gallagher, M. J., (June 2019). *Learning is the Work.* Motion Leadership, p. i.

the API, the Dashboard does not overcome the danger of oversimplification of problems and solutions. Moreover, the multiple indicators can be seen as disparate aspects of school performance, leading to the pursuit of strategies to fix one particular indicator one year and a different one the next. As we discuss next, the volatility of the Dashboard compounds this problem.

Volatility. The 2017 Dashboard release identified 226 school districts for differentiated assistance. With the addition of chronic absenteeism and students' readiness for college and careers indicators, 374 school districts were identified for DA in the 2018 release. Among the district officials in our sample, many expressed concern over the apparent volatility and the large increase in the number of subgroups that fell into the lowest rating from 2017 to 2018. One district superintendent described the problem as "whack-a-mole." As the superintendent explained, one year the district was identified for assistance based on the performance of two groups, and the next year the district was identified for two different groups. Several COE superintendents agreed that the volatility of the Dashboard was problematic, noting that the annual fluctuations are often a result of the changing numbers of students in various subgroups from year to year. Having different subgroups emerge as deficient from one year to the next makes it hard to value the data and mount a sustained focus.

Officials in small school districts were particularly concerned about volatility issues because of the low and fluctuating numbers of students in any given subgroup. In response to these concerns, the state has reduced the number of change levels for graduation, suspension, and chronic absenteeism indictors for small districts. Small districts' performance on these indicators is now rated as increased, maintained, or declined (thereby dropping the increased significantly and declined significantly ratings). With fewer ratings of change, the Dashboard's volatility for small districts should be reduced. Despite these changes, our interviews with officials from small rural districts reported that the Dashboard fails to accurately identify the major problems they face. (See Small School Districts box).

The Dashboard's Technical Problems Undermine the Validity and Comprehensibility of Measures to Guide Improvement Efforts

More technically oriented officials in the districts and some researchers expressed concerns about the basic structure of the Dashboard. While agreeing with the use of both change and status measures to determine district and school performance, some officials stressed that the cut scores on the status measures are very low. As one administrator reported, "I think that the state did make an error in the Dashboard. The biggest error [is that] they set their cut points too low in some cases."

California's Small School Districts, the System of Support, and the Dashboard

Of all of the districts in our sample, the majority of officials in small districts were most appreciative of the assistance they received from their COE. While there were significant differences in the size of the small districts in our sample (ranging from 100 to 1,000 students), their administrators viewed their COE as the primary source for quality professional development and technical advice. As one small district administrator reported, "[Our COE] has hired experienced knowledgeable personnel who can easily come in and work with a staff... and do it in a way that's not 'shame on you' but instead 'let's roll up our sleeves...'" This view is consistent with previous reports of small district staff as they worked with their COE to implement the LCFF and develop their LCAP.[27]

These positive views come in the context of our case study districts with mostly poor and white student populations and pockets of Native Americans. Chronic absenteeism and suspensions are common. District leaders reported that they had increasing proportions of students facing significant trauma related to poverty, substance abuse, and homelessness. Citing students' need for significant social and emotional support, one administrator noted, "Kids first need to get to school and get equipped with supports so they can learn in the first place." Compounding these challenges, some families and educators in the smallest districts were highly suspicious of government institutions. In addition, some district administrators in the small, "off the grid" districts did not fully buy into the System of Support or believe that the state cared enough about their challenges to make submitting their data worth the effort.

Both COE and district officials reported that limitations of the Dashboard made it "irrelevant" or "inaccurate" for many small districts. Administrators in the smallest districts argued that there are great needs that aren't being accounted for by the Dashboard and that some districts should be eligible for differentiated assistance but are not. In addition, some small districts have too few students in subgroups to be reported on any of the six indicators and some had problems submitting their data. As one administrator reported: "...staff are strapped, they are slow to learn CALPADS (California Longitudinal Pupil Achievement Data System)... There are multiple Student Information Systems and we have not done the best job scrambling with the CALPADS system. [And] there is lots of turnover in the smalls." In one county, approximately one in five districts did not enter their Dashboard data, and 40 percent of districts entered their data but their student groups were too small to show up on the Dashboard.

The state's reasonable concerns about student privacy and the impact of a few very low- or high-performing students on performance ratings mean that indicator results are not reported for student groups numbering fewer than 11, and groups numbering 11-29 students are not assigned a color-coded performance level. While the state has taken steps to reduce the volatility of the Dashboard, district officials found the Dashboard to be of limited utility, leaving them on their own to identify student groups that need attention.

Noting that low cut scores likely stem from political issues, another administrator responsible for analyzing district data surmised that:

...the [California] State Board [of Education] didn't want too many schools in red and orange so when they set their cut points they didn't set them on what's really our target. ...I'm fearful of the day when they adjust the cut points and what that's going to do to the system. Because it's almost like we were good enough now but then we're not going to be good enough. I'm not sure what message that sends to the schools about what we really want.

For most educators and the public, recent changes to the Dashboard have made it more comprehensible, but the technical intricacies are beyond the understanding of most. For example, it is not easy to interpret what having a Distance-from-Standard (DFS) score of 167 negative points actually means.

Some researchers have expressed additional technical concerns. Polikoff found at least four significant limitations of the Dashboard in its current form. First, the Dashboard does not allow users to compare schools between districts. He argued that users should be able to select as many schools as they would like from across districts and charter schools for comparison purposes. Second, the Dashboard does not allow comparisons across multiple indicators and among schools with similar demographics. Third, he found that the Dashboard allows users to compare schools only on the overall performance of each indicator, but not on student group performance. Finally, Polikoff argued that the state's approach to student growth is simplistic and ignores cohort effects, and thus should be replaced with a more appropriate growth measure (such as a two-step value-added model). Notably, only California and Kansas have not adopted a growth model.[28]

Yellow is not yellow. Some district officials also reported concerns about the meaning and lack of clarity of the colors on the Dashboard. Because the colors represent both status and change measures, a high-performance district or school could be in the middle range (yellow) because it declined on a given measure relative to the previous year, while a low-performance district could earn the same yellow designation by showing positive change despite low status. As one district data official pointed out:

[27] Koppich, J. E., and Humphrey, D. C. (2018, September). *The Local Control Funding Formula: What Have We Learned After Four Years of Implementation?* Policy Analysis for California Education: Getting Down to Facts II. Access at: https://gettingdowntofacts.com/publications/local-control-funding-formula-after-four-years-what-do-we-know
[28] Polikoff, M. S., (March 2019). *Gauging the Revised California School Dashboard: Evidence form the 2019 PACE/USC Rossier Voter Poll.* Policy Analysis for California Education.

Yellow is not yellow is not yellow. …you can be yellow because you are kind of in the middle of doing nothing. You can be yellow because you're high but went backwards. And you can be yellow because you're low but you're increasing. And we're seeing a lot of our Title I schools [are not] just red and orange anymore. They're getting into that yellow, and why? Because their change is growth. And I got some of my high-end schools actually that aren't [blue] anymore… They're going into green and sometimes… into yellow because they are really high but they're seeing that decline.

As this administrator explained, the upside of this is that some low-performing schools are suddenly able to celebrate getting a yellow rating, even though their status performance is still extremely low. State officials acknowledged the yellow-is-not-yellow issue, but argued that Dashboard users can dig deeper and see where each district and school landed on both status and growth measures.

The State's Definition of English Learners May Limit the Dashboard's Ability to Accurately Identify Districts Needing DA for Current and Long-term English Learners

Several district officials argued that English learners are being shortchanged by the Dashboard and the state's definition of this subgroup of students. As one superintendent argued:

…the decision was made at the state level to put English Learners and Reclassified English Learners [ELO and RFEP] … together. So, it looks like on average… that people are doing well. You miss the needs of the kids who are English Learners still and particularly long-term English learners. …There's no dedicated funding, there's no dedicated professional development to address those needs of English Learners.

Researchers concentrating on English learners have elaborated on this concern. As they argue:

The combined ELO + RFEP subgroup resulted in the vast majority of districts falling within the Yellow, Green, or Blue bands in the Academic Indicator for ELs. These results could potentially fail to address the needs of ELs and exclude them from receiving technical assistance and financial support in their LCAPs.[29]

---

[29] Lavadenz, M., Armas, E., and Hodge, S. J. (2018). *Masking the Focus on English Learners: The Consequences of California's Accountability System Dashboard.* Results on Year 4 Local Control and Accountability Plans (LCAPs). Californians Together and Loyola Marymount University. P. 7.

According to the researchers, the aggregated results from the Dashboard could mask the results for English Learner Only (ELO) students, including the various EL profiles (i.e., long-term English learners, newcomers, etc.). The researchers argued that obscuring ELO results could have detrimental effects on districts' abilities to address LCAP goals, set growth targets, focus programs and services, and allocate supplemental and concentration funds for this targeted group of students. Of course, knowing the performance of reclassified as well as ELO students gives some indication of the effectiveness of schools and districts with this population as a whole. But combining the two groups has raised equity concerns among some researchers and advocates.

The Timing of the Release of the Dashboard Presents a Key Implementation Problem

California collects mountains of data from districts, but not all of those data are available in a timely fashion. In order for the state to ensure the accuracy of all of the measures before they go public, the release of the Dashboard currently does not occur until December, which is already well into the school year. By the time the COEs contact the districts identified for DA, schedule meetings with the districts, and develop a plan for assistance, their work with the districts generally does not begin until late January or February. Given that COE superintendents are expected to report back to the districts regarding their DA by June, DA can feel like it ends right after it begins. CDE officials acknowledge the timing problem, but point out that the data on some indicators (graduation rates, test scores, etc.) are not available until late August. While there are efforts underway to release earlier, realistically the Dashboard is unlikely to be made available until the fall. As one COE administrator explained:

> We get the data in December, ...probably letters go out January, do our data meetings early February, but that really truncates the timetable for the three or four meetings, or five depending on the district...

Timing of the Dashboard's release and the ensuing provision of DA also creates a mismatch with the timing of the districts' strategic planning and the LCAP development process. Furthermore, district officials reported that by the time the Dashboard data are released, the data are a little too old to be helpful. Moreover, districts with more sophisticated data systems are able to access more timely data than the state provides, rendering the state data less valuable for planning purposes. The Dashboard also comes out after most districts are already working on their Local Control Accountability Plan (LCAP) for the subsequent year.[30] As one district superintendent explained: "We need that

---

[30] We note that district officials continue to argue, as they have since it was first introduced, that the LCAP template, despite revisions, is cumbersome and fails to serve its multiple purposes (planning, accountability, and engagement). The State Board of Education will release the fourth revision of the LCAP in January 2020, for use in the 2020-21 school year.

information sooner. It would be almost like... build a budget without knowing how much money you have."

Although districts with sophisticated local data systems generally view the Dashboard as an improvement over previous systems, they report that it is still inadequate to meet their needs. Instead, they pay more attention to more timely information from their own local data systems. As one district official reported:

> *...the timing is so late in terms of the improvement cycle. The good news is we now get the underlying data earlier than we ever used to. ...By the time the Dashboard actually comes out, are we using that data? Yes. Is the Dashboard necessarily the driving force? No, because it's too late in the improvement cycle.*

While the timing problems associated with the Dashboard appear to limit the effectiveness of DA, our case study COEs were working to expand the support they provide, in part by better integrating DA with their other ongoing work with all of the districts in their counties.

Not Yet a System

A system is usually thought of as a collection of parts or organizations that share a common purpose, act rationally and interdependently to achieve the purpose, and form a coherent whole. California's System of Support and the state's overall approach to accountability have yet to adhere to all aspects of the definition of a system. As one COE leader argued:

> *California has been really forward thinking, but... when you look at this thing as a system, it felt like it came out in parts... I think sometimes it was just "well I have an LCAP and apparently now I have a Dashboard too" instead of saying there's a system here that's leading me towards something, and how do we work within that system?*

One reason the state's approach currently falls short of cohering as a system is that while the various governmental and non-governmental organizations playing important roles in it appear to share a common purpose, the specific responsibilities of the CCEE and the CDE are not well understood at the local level. And while CDE and COE leadership have clearly signaled their commitment to improvement through support rather than compliance, both CDE and the COEs still have significant compliance monitoring responsibilities of federal and state programs that can send conflicting messages to the districts.

Another source of incoherence has to do with the timing of the Dashboard release, which, as noted above, is out of sync with timing of districts' planning and the development of their LCAPs. While districts appear to incorporate Dashboard data in their LCAPs, most districts' planning for the coming school year typically is part of LCAP development and continues into the summer. Moreover, districts with more sophisticated data systems are able to access more timely data than the state provides, rendering the state data less valuable for planning purposes.

A third problem lies in the disjuncture in the sources of accountability between the LCAP process and the System of Support. California's accountability system includes two somewhat different approaches. In the System of Support, accountability is driven by the state identifying district deficiencies via the Dashboard; in the LCAP process, it is parents, community members, and other stakeholders who hold the district accountable for meeting goals and engaging in activities set by the local community. Most districts' LCAPs appear to include Dashboard data, but we found few districts or COEs that alerted parents and community members of Dashboard results when they were released. Unless parents and community members access the CDE website, they are unlikely to be aware of the Dashboard results of their district or school. This is understandable, as there are no incentives for districts to advertise poor performance and no incentives for COEs to undermine positive relationships with their districts by displaying Dashboard results. That said, a critical assumption of the LCFF is that stakeholder engagement is a key part of the accountability system, and it is appears that the System of Support largely avoids such engagement.

A system also requires adequate resources and the capacity to make strategic use of those resources. COEs have additional monies from the state to assist their districts as part of the System of Support, but these resources are modest compared to the expectation that COEs will help lift hundreds of districts out of identification for differentiated assistance. Indeed, the state allocated about $66 million to COEs and about $21 million to the Special Education Local Plan Area leads, the GEO and other leads for the System of Support for the 2019-20 school year out of a total K-12 education budget of $84.5 billion. Even with the additional funds, the COEs do not know how much they will receive until the Dashboard is released in December making it difficult to ensure they have adequate staffing in place.

Finally, the System of Support does not systematically mobilize or coordinate governmental and non-governmental resources to support district improvement. In particular, differentiated assistance is largely dependent on COEs, which, as we have noted, vary in their capacity to respond to district needs. Meanwhile, nonprofit organizations, internal expertise from exemplary districts, and institutions of higher education (IHEs) must rely on the COEs' willingness to share their new resources or

include them in assistance plans. We found some examples of COEs connecting districts with sources of assistance, but that approach was the exception. In general, districts are left on their own to access help beyond that provided by COEs. This is the case despite policymakers' stated intention in California's ESSA Consolidated State Plan:

> *Critical roles will also be played by multiple stakeholders in the full System of Support including other state entities (i.e., the California Commission on Teacher Credentialing and California Subject Matter Project), labor, state associations, researchers, non-profit organizations, institutions of higher education, philanthropy, and coalitions. Systematic collaboration and coordination among all of these entities will facilitate coherent technical assistance and support at the local level and ensure alignment of efforts to continuously improve student outcomes.[31]*

All of this raises questions about the adequacy of resources, the best way to distribute support dollars, and how to marshal all of the expertise in the state in service of improvement for all districts and schools.

Recommendations

California's new System of Support is in its early implementation stage, and modifications are likely to be made as the system matures. This report was designed to identify both early successes and challenges. With the intention of maintaining those successes and addressing the challenges, we present five recommendations drawn from our research.

1. **The System of Support should include the full complement of expertise in the state, including nonprofits, within-district teams, and universities, along with COEs to assist districts.**

The central actors in the System of Support are COEs, but there is a huge variation in the size, expertise, and responsibilities of COEs. For example, the Los Angeles COE serves 80 school districts with 1.5 million K-12 students and about 1,600 staff members, while the Alpine COE serves 80 students with five staff members. While the System of Support relies on the COEs to assist districts, and to a lesser extent the CCEE and the CDE, other sources of expertise are only involved in the support system when the COEs are willing to divert their funds (some do; most don't). To create a more robust System

---

[31] State Board of Education and the California Department of Education (2017). California ESSA Consolidated State Plan. https://www.cde.ca.gov/re/es/documents/essastateplan2018.pdf

of Support, we urge that the state more effectively and consistently draw on the entire capacity within the state to foster improvement in all districts and schools. There is no quick fix to building meaningful support for district improvement across the state, but incentivizing COEs to draw on regional expertise from a variety of sources and investing resources in exemplary districts to share their expertise in service of other districts could lead to a much more effective statewide system.

2. The System of Support needs to be a sustained, multi-year, and tiered intervention.

As our research suggests, the current configuration of the System of Support suffers from a truncated period of intervention, resulting in a fairly light touch. Some COEs have taken steps to provide year-round support as part of the system, but are limited by the timing of the Dashboard's release, inadequate resources, and the brief window for their work with districts identified for differentiated assistance. In addition, the System of Support provides limited resources to assist districts not identified for DA. Moreover, while the System of Support alludes to a more intensive assistance for districts failing to make progress after being assigned to DA in three out of four years (Tier 3), the state's approach to Tier 3 support is not clearly communicated. As the System of Support is modified, there is a clear need to move beyond a light touch.

3. The state should make data on each Dashboard indicator available as soon as possible to better assist districts' and schools' planning and improvement processes.

As district and COE officials emphasized, the timing of the Dashboard release is problematic for planning and improvement efforts. While state administrators are working to speed up the release, some data elements will never be available before the school year begins. Rather than wait until data on all of the Dashboard indicators are ready, more timely release of individual indicators as soon as the relevant data are available would help. This will require expanding the capacity of CDE's Analysis, Measurement and Reporting Division. Of course, earlier release of the Dashboard data as it is available has implications for how districts are identified for DA and suggests that the state should consider extending the number of years DA is provided once a district is identified.

4. Districts and COEs should provide stakeholders opportunities for meaningful engagement in developing strategies for improvement that come out of DA.

A key feature of the LCFF is the requirement to give parents, community members, and other stakeholders meaningful opportunities to engage in decision-making. However, the DA process does not include engagement opportunities. Districts generally do not make their constituencies privy to the content of the differentiated assistance they

receive; there is no mechanism to engage parents and community members in the work of the COEs and the districts required to participate in differentiated assistance. Such engagement could be incorporated into existing district engagement efforts.

5. **For the System of Support to be successful, the state must allocate adequate and sustained resources.**

"More resources needed" is a common finding of researchers examining California's education system, and policymakers clearly tire of this repeated mantra. Resources are finite and policymakers must make choices. The current configuration of the System of Support can be a lifeline for small districts or just a light touch for most districts. Either way, the level of investment is too small to establish a robust statewide support system. Policymakers may want to consider a reallocation of funds, but without additional revenues and investments, a more comprehensive and effective System of Support is unlikely to be realized.

Author Biographies

Dr. Daniel C. Humphrey is an independent consultant who has specialized in research on education policy for over 25 years. His most recent work has been focused on California education policy, including a variety of research projects on the implementation of the LCFF.

Dr. Jennifer O'Day, an Institute Fellow at the American Institutes for Research, has conducted research and advised policymakers on system improvement, capacity building, accountability, and equity for over 30 years. As chair of the California Collaborative on District Reform, she has helped to identify and address challenges in LCFF implementation.

About

Policy Analysis for California Education (PACE) is an independent, non-partisan research center led by faculty directors at Stanford University, the University of Southern California, the University of California Davis, the University of California Los Angeles, and the University of California Berkeley. PACE seeks to define and sustain a long-term strategy for comprehensive policy reform and continuous improvement in performance at all levels of California's education system, from early childhood to postsecondary education and training. PACE bridges the gap between research and policy, working with scholars from California's leading universities and with state and local policymakers to increase the impact of academic research on educational policy in California.

Founded in 1983, PACE

- Publishes policy briefs, research reports, and working papers that address key policy issues in California's education system.
- Convenes seminars and briefings that make current research accessible to policy audiences throughout California.
- Provides expert testimony on educational issues to legislative committees and other policy audiences.
- Works with local school districts and professional associations on projects aimed at supporting policy innovation, data use, and rigorous evaluation.

LCFFRC
Local Control Funding Formula Research Collaborative

edpolicyinca.org