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July 29, 2016

Dr. Carl Cohn
Executive Director, CCEE

Dear Dr. Cohn:

On behalf of the California County Superintendents Educational Services Association (CCSESA), I am writing to provide our comments and recommendations on item 3.1 on the CCEE Board of Directors agenda for August 4, 2016. That item concerns the LCFF Professional Development Plan.

First, we want to express our great appreciation for the extensive efforts of your staff, and Josh Daniels in particular, to solicit input from local educators and other education leaders across the state. The draft included in the August 4 agenda provides substantial detail that facilitates meaningful review and comment.

In your cover memo to the CCEE Board, you ask if there are other components that should be included in the final implementation plan. We strongly recommend that the final plan include a more urgent, statewide professional development effort with regard to the revised LCAP template and the evaluation rubrics. In particular, we believe it is essential in 2016-17 that professional development is provided to every school district in the context of their unique LCAP and evaluation rubric data.

The plan on the Board's August 4 agenda contains the following proposed expenditure pattern:

2016-17	\$ 3,050,000
2017-18	\$ 7,325,000
2018-19	\$ 9,625,000

Both financial resources and the focus of the plan need to be shifted dramatically towards 2016-17. Every school district and county office of education in the state will be required to use the revised template for the first time in 2016-17 and they will receive data, based on the state adopted evaluation rubrics, for the first time in 2016-17. This represents an enormous professional development challenge, particularly if the expectation is that districts will use the data and the new template to support the critical cultural shift from a compliance document to one of continuous improvement.

To support this critical transition, CCSESA believes the most important step is to support a one-on-one meeting of every school district and county office with key staff from the agency that will be reviewing and approving their LCAP. Although the statewide trainings proposed in the draft plan will provide the basics on the template and the rubrics, such district- and county-specific conversations will immediately move the work deeper and faster by putting these important changes in a context that is meaningful to the programs and plans of that district and community.



Local educators and community/parent advocates are appropriately expressing an urgent need to see results from the shift to the LCFF/LCAP model. We believe it would be a serious missed opportunity to place the emphasis of the plan on activities more than two years away when we know the urgent need is now.

Specifically, our recommendation is that in lieu of the \$5,000 per school district "COE Add-On" proposed for 2017-18 and 2018-19 under Component III, funding be provided in 2016-17 to each county superintendent that reviews and approves school district LCAPs for each district in that county, contingent on the following criteria:

1. Key county staff involved in the LCAP review and approval process meet with leadership from the school district to review and discuss the revised LCAP template, and the evaluation rubrics.
2. The meetings must take place after the release of the state data to populate the state-adopted rubrics and before March 31, 2017, and the county staff must review, prior to that meeting, both that district's data and the district's currently approved LCAP, in order to support a conversation that is specific to that district.
3. The county office of education must participate in the collaborative training for local trainers (component II of the draft plan). In this manner, the proposed COE Add-On would be shifted from Component III to Component II and accelerated into the 2016-17 school year.

County offices of education are the only agencies that can commit to providing district-specific training statewide to every school district in the state in this time frame. Our estimate is that the cost of this effort would be \$4.7 million statewide if every county office participates with every school district. We believe this amount can and should be shifted from the planned expenditures for 2017-18 and 2018-19-- the urgent need to support every school district and county office of education in moving forward in an aligned effort is now. Alternatively, the Board could consider allocating for this purpose some of the \$5.6 million re-appropriated to CCEE in the state budget. That budget language says the funds may be used for conducting a pilot program... "and to support statewide training on the evaluation rubrics", so it would be an allowable use of those funds.

We look forward to working with you and your staff, the State Board of Education, and CDE to successfully implement LCFF and support discussions and actions that are focused on improved student performance.

Sincerely,

Peter Birdsall
Executive Director