



## DEMONSTRATION OF INCREASED OR IMPROVED SERVICES FOR UNDUPLICATED STUDENTS REQUIREMENT FAQ

### **Question #1: How can an action or service increase or improve services for unduplicated students as compared with the actions and services available to all students?**

Response #1: There are three basic ways an action or service can increase or improve services for unduplicated students as compared with the actions and services available to all students.

- » Limited to Unduplicated Students. An action or service that is limited to unduplicated students is one that exclusively serves unduplicated students. Due to the targeted nature of the action or service (i.e., non-unduplicated students are not served by the action or service), it necessarily is an action or service that increases or improves services for unduplicated students as compared with the actions and services available to all students.
- » LEA-Wide. An LEA-wide action or service is offered across the LEA and serves more than just unduplicated students (although not every student in the LEA must be served). Under state regulations, this action or service does increase or improve services for unduplicated students as compared with the actions and services available to all students if, based on local context and need, it is principally directed to and effective in meeting one or more of the LEA's LCAP goals for unduplicated pupils. For an LEA with an unduplicated percentage of less than 55%, state regulations also require that the action or service be the most effective use of the funds to meet one or more LCAP goals for unduplicated pupils.
- » School-Wide. A School-wide action or service is offered across one or more school sites (but not the whole LEA) and serves more than just unduplicated students (although not every student at each school site must be served). Under state regulations, this action or service does increase or improve services for unduplicated students as compared with the actions and services available to all students if, based on local context and need, it is principally directed to and effective in meeting one or more LCAP goals for unduplicated pupils. For a school site with an unduplicated percentage of less than 40%, state regulations also require that the action or service be the most effective use of the funds to meet one or more LCAP goals for unduplicated pupils. (If a School-wide action or service is offered across more than one school site and one of those school sites has an unduplicated percentage of less than 40%, then this additional requirement applies.)

The LCAP Template now requires each LEA to indicate whether it deems an action or service to increase or improve services for unduplicated students as compared with the actions and services available to all students. To do so, the LEA must use the box titled "For Actions/Services included as contributing to meeting the Increased or Improved Services Requirement" in the Goals, Actions and Services section and check the appropriate Scope of Service ("LEA-wide," "Schoolwide," or "Limited to Unduplicated Student Group(s)"). (Leave the box titled "For Actions/Services **not** included as contributing to meeting the Increased or Improved Services Requirement" blank for such an action or service.)



It is important to note that there is no bright-line rule as to whether a specific action or service can properly be deemed an LEA- or School-wide action or service – i.e., whether a specific action or service increases or improves services for unduplicated students as compared with the services offered to all students. Moreover, an action or service that is properly deemed to be an LEA- or School-wide action or service in one community may not be in another as this determination is deeply dependent on local context. What can be done in every community is for the LEA to include in its LCAP a clear explanation for each LEA- or School-wide action or service so that local stakeholders are able to weigh in on whether they believe it satisfies the state regulations.

**Question #2: What amount of “supplemental” and “concentration” funds must be included in an LEA’s LCAP? How much of an LEA’s “supplemental” and “concentration” funds must be used to support unduplicated students?**

Response #2: These questions presume that LCFF revenue is divided into unrestricted funds and restricted funds, which function like a categorical program. This is incorrect. LCFF moved away from a focus on restricting how funding may be spent and shifted towards a focus on whether the services being funded are actually improving outcomes for students.

As a result of this shift in focus, LCFF requires that an LEA increase or improve services for its unduplicated students as compared to those services provided for all students. The increase in or improvement of services must be by at least the percentage increase listed in DIISUP section (from FCMAT calculator). So while the “Demonstration of Increased or Improved Services for Unduplicated Students” (or DIISUP) Requirement is based on the amount of additional funding generated by unduplicated students, LCFF does not require restricting the use of those funds or delineating how those funds may be spent.\*

Instead, the DIISUP Requirement imposes a “doing” requirement – an LEA must do more for unduplicated students than it does for all students. This “doing” can be quantitative (i.e., providing more actions and services for unduplicated students than actions and services provided for all students) or qualitative (i.e., improve the quality of actions and services for unduplicated students as compared with the quality of actions and services for all students). Put another way, an action or service does not satisfy the DIISUP Requirement because it is funded with “supplemental and concentration funds. What matters is whether an LEA can explain how an action or service increases or improves services for unduplicated students as compared with the actions and services available to all students. And, as noted above, the combined impact of all actions and services that increase or improve services for unduplicated students (as compared with the actions and services available to all students) must be by at least the percentage increase in LCFF funding the LEA receives due to unduplicated student enrollment.

---

\* There is also nothing prohibiting an LEA from treating the funds generated by unduplicated students as restricted and tracking them separately. LEAs that choose to do so must still demonstrate that they have met the DIISUP requirement. Additionally, LEAs that do choose to treat the funds generated by unduplicated students as restricted may opt to stop doing so at any time.