

**TITLE 5 LOCAL CONTROL FUNDING FORMULA AND TEMPLATE REGULATIONS
COMMENTS AND RESPONSES TO THE 15-DAY COMMENT PERIOD (JULY 12-28, 2014)**

	Name/Agency (Commenter)	Title 5 Regulation Section and Public Comment	Agency Response
1	<p>Leslie DeRose, Board Member, Pajaro Valley Unified School District Niccole Childs, Board President, Hesperia Unified School District Sherri Reusche, Board Member, Calaveras Unified School District Annie Fox, PICO California Cindy Marten, Superintendent, San Diego Unified</p>	<p>15495(a) - No specific language recommended:</p> <p>Amend language to ensure pupils are consulted as the LCAP is being developed, rather than sharing the LCAP once it is completed.</p>	<p>Accept: As stated in response to comment #3, the language of proposed section 15495(a) is revised to ensure pupils are involved in the development of the LCAP.</p>
2	<p>Kimberly Rodriguez, Association of California School Administrators</p>	<p>15495(a) - No specific language recommended:</p> <p>Carefully consider if definition of “consult with pupils” is necessary and if so, clarify what is meant by “consulting”.</p> <p>The proposed definition is overly broad and unnecessary and may have implications in the Uniform Complaint Process as this process may be used when LEAs fail to comply to complete the required consultations.</p>	<p>Reject. The language of proposed section 15495(a), revised as described in response #3, provides a definition for “consult with pupils” to clarify that the consultation process is to enable review and comment on development of the LCAP. Inclusion of a definition for consultation with pupils is necessary to assist local education agencies (LEAs) to implement LCFF’s new statutory process for consultation with pupils. It also provides a list of permissive examples for how to complete this engagement. The revised definition provides needed flexibility for an LEA to design a process that meets the needs of its pupils, grade levels served, and type of program. As clarified, the proposed definition sufficiently informs LEAs and potential UCP complainants regarding the purpose and process for “consultation”</p>

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		<p>LCAP to pupils for review and comment. <u>Students are the ultimate stakeholders and they bring an important perspective to the table, especially at the high school level.</u> This process may include, but is not limited to, surveys of pupils, forums with pupils, or meetings with pupil government bodies or other groups representing pupils, <u>or student representation on the District Advisory Committee.</u></p>	<p>consult on the LCAP.</p>
5	Cecelia Mansfield California State PTA	<p>15495(a):</p> <p>Add the following to increase the role of students in the planning process:</p> <p>“Consult with pupils”, as used in Education Code sections 52060, 52066, and 47605.5, means a process for the presentation of the LCAP to pupils for review and comment. This process may include, but is not limited to, <u>student representation on the District Advisory Committee,</u> surveys of pupils, forums with pupils, or meetings with pupil government bodies or other groups representing pupils.</p>	<p>Reject: The District Advisory Committee is not required to be used as the parent advisory committee with which the LEA must consult on the LCAP.</p>
6	Oscar Cruz, President and CEO, Families in Schools Civil Rights Coalition Student Voice Coalition	<p>15495(a):</p> <p>Add the following to increase the role of students in the planning process:</p> <p>“Consult with pupils”, as used in Education Code sections 52060, 52066, and 47605.5, means <u>establishing a process or processes for the inclusion of pupils in the development of the LCAP and for the</u> presentation of the LCAP to pupils for review and comment. This process may include, but is not limited to, <u>formation of a student advisory committee similar in function to parent committees in subparagraphs (b) and (e) of this section,</u> surveys of pupils, forums with pupils, or meetings</p>	<p>Partially Accept: The language of proposed section 15495(a) was revised as set forth in response #3 to ensure pupils, including unduplicated pupils and other numerically significant pupil subgroups, are involved in the development of the LCAP.</p> <p>Partially Reject: Addition of the suggested language regarding formation of a student advisory commit is not necessary as LEAs have discretion to form such a committee for</p>

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		<p>with pupil government bodies or other groups representing pupils. <u>The process or processes that an LEA adopts should ensure the inclusion of unduplicated pupils and other numerically significant pupil subgroups.</u></p>	<p>consultation.</p>
7	Colin Miller, California Charter Schools Association	<p>15495(a): This section contains an incorrect cross reference, on page 2, line 1, replace 47605.5 with 47606.5.</p>	<p>Accept: The language of proposed section 15495(a) was revised as set forth in response to comment #3. The revisions include replacing the reference to section 47605.5 with 47606.5.</p>
8	Oscar Cruz, President and CEO of Families in Schools	<p>15495(b) and (e): Amend section 15495(b) and (e) to state: (b) "English learner parent advisory committee," as used in Education Code sections 52063 and 52069 for those school districts or schools and programs operated by county superintendents of schools whose enrollment includes at least 15 percent English learners and at least 50 pupils who are English learners, shall be composed of <u>parents or legal guardians, of which at least a majority of are parents or legal guardians of pupils to whom the definition of Education Code section 42238.01(c) apply or an equivalent percentage as the number of pupils to whom to the definition of Education Code section 42238.01(c) apply, whichever is greater.</u> A governing board of a school district or a county superintendent of schools shall not be required to establish a new English learner parent advisory committee if a previously established committee meets these requirements. (e) "Parent advisory committee," as used in Education Code</p>	<p>Reject: The suggested revisions to the proposed regulation section 15495(b) and (e) would create an additional and potentially insurmountable burden for LEAs to ensure they meet the specified percentage requirements for committee composition. Regulation section 15495(e) is renumbered to be 15495(f) due to the addition of a new subdivision (e), which adds a definition of "parents". In addition, the wording of the renumbered 15495(f) is revised, as is the wording of 15495(b), as a result of the addition of new subdivision (e). See revised language set forth in response to comment #11.</p>

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		<p>sections 52063 and 52069, shall be composed of <u>parents or legal guardians, of which at least</u> a majority of <u>are</u> parents or legal guardians of pupils and include parents or legal guardians of pupils to whom one or more of the definitions of Education Code section 42238.01 apply <u>or an equivalent percentage as the number of pupils to whom to the definition of Education Code section 42238.01(c) apply, whichever is greater</u>. A governing board of a school district or a county superintendent of schools shall not be required to establish a new parent advisory committee if a previously established committee meets these requirements, including any committee established to meet the requirements of the federal No Child Left Behind Act of 2001 (Public Law 107-110) pursuant to Section 1112 of Subpart 1 of Part A of Title I of that act.</p>	
9	<p>Civil Rights Coalition</p> <p>Maria Raouf Annie Fox, PICO California Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education</p>	<p>Section 15495(e):</p> <p>Ensure parents of unduplicated pupils are represented on the parent advisory committees in proportion to the composition of unduplicated pupils in the district.</p> <p>Amend Section 15495(e) to state:</p> <p>(e) "Parent advisory committee," as used in Education Code sections 52063 and 52069, shall be composed of a majority of parents or legal guardians of pupils and include parents or legal guardians of pupils to whom one or more of the definitions of Education Code section 42238.01 apply. A governing board of a school district or a county superintendent of schools shall not be required to establish a new parent advisory committee if a previously established committee meets these requirements, including any committee established to meet the requirements of the federal No Child Left Behind Act of 2001 (Public Law 107-110)</p>	<p>Reject: The suggested revisions to the proposed regulations may create an additional and potentially insurmountable burden for LEAs to ensure they meet the specified percentage requirements for committee representation.</p>

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		<p>pursuant to Section 1112 of Subpart 1 of Part A of Title I of that act. <u>The overall representation on the committee of parents or legal guardians of pupils to whom one or more of the definitions of Education Code section 42238.01 apply should, at a minimum, be proportional to the overall representation of such pupils among the LEA's total enrollment.</u></p>	
10	<p>Leslie DeRose, Board Member, Pajaro Valley Unified School District Niccole Childs, Board President, Hesperia Unified School District Sherri Reusche, Board Member, Calaveras Unified School District California School Boards Association</p>	<p>15495(e) - No specific language change recommended:</p> <p>Support the clarification that the Parent Advisory Committee must be comprised of a majority of parents/guardians of pupils in general and is not limited to the categories of unduplicated pupils.</p>	<p>Reject: The suggested revision is not necessary. The proposed section 15495(f) requires an LEA parent advisory committee to be composed of a majority of parents of pupils, and requires inclusion of parents of pupils to whom one or more of the definitions of unduplicated pupils applies.</p>
11	<p>Jackie Thu-Huong Wong, Director Foster Ed, National Center for Youth Law Debra Brown, Associate Director, Children Now Alliance for Children's Rights</p>	<p>15495(e)</p> <p>Amend this section to ensure representation of foster youth on the parent advisory committee as follows:</p> <p>"(e) "Parent advisory committee," as used in Education Code sections 52063 and 52069, shall be composed of a majority of parents, or legal guardians, <u>or educational rights holders</u> of pupils and include parents, or legal guardians, <u>or educational rights holders</u> of pupils to whom one or more of the definitions of Education Code section 42238.01 apply. <u>The committee shall include representation from each of the three subgroups of</u></p>	<p>Partially Accept: The language of proposed section 15495 was revised to add a proposed subdivision (e) to add a definition of "parents." The proposed definition of "parents" includes "parent, legal guardian, and educational rights holder," as follows:</p> <p><u>"(e) "Parents" means the natural or adoptive parents, legal guardians, or other persons holding the right to make educational</u></p>

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		<p><u>pupils defined in Education Code section 42238.01 and served by the district.</u> A governing board of a school district or a county superintendent of schools shall not be required to establish a new parent advisory committee if a previously established committee meets these requirements, including any committee established to meet the requirements of the federal No Child Left Behind Act of 2001 (Public Law 107-110) pursuant to Section 1112 of Subpart 1 of Part A of Title I of that act.”</p>	<p><u>decisions for the pupil pursuant to Welfare and Institutions Code section 361 or 727 or Education Code sections 56028 or 56055, including foster parents who hold rights to make educational decisions.”</u></p> <p>In addition, proposed section 15495, subdivisions (b) and (f), are revised to make reference to “parent,” as follows:</p> <p><u>“(b) “English learner parent advisory committee,” as used in Education Code sections 52063 and 52069 for those school districts or schools and programs operated by county superintendents of schools whose enrollment includes at least 15 percent English learners and at least 50 pupils who are English learners, shall be composed of a majority of parents, as defined in subdivision (e), or legal guardians of pupils to whom the definition of in Education Code section 42238.01(c) applies. A governing board of a school district or a county superintendent of schools shall not be required to establish a new English learner parent advisory committee if a previously established committee meets these requirements.”</u></p> <p><u>“(f)(e) “Parent advisory committee,” as used in Education Code sections 52063</u></p>

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			<p><u>and 52069, shall be composed of a majority of parents, as defined in subdivision (e), or legal guardians of pupils and include parents or legal guardians of pupils to whom one or more of the definitions of in Education Code section 42238.01 apply. A governing board of a school district or a county superintendent of schools shall not be required to establish a new parent advisory committee if a previously established committee meets these requirements, including any committee established to meet the requirements of the federal No Child Left Behind Act of 2001 (Public Law 107-110) pursuant to Section 1112 of Subpart 1 of Part A of Title I of that act.”</u></p> <p>Partially Reject: The suggested language requiring representation from each of the three groups identified as unduplicated pupils may be burdensome for LEAs, particularly in those that have lower enrollment of unduplicated students.</p>
12	California School Finance Reform Coalition	<p>15495(g):</p> <p>Amend language to focus on specified measures in statute and not the quantity of identified measurements as follows:</p> <p>(g) “Required metric” means all of the specified measures and standards for each state priority as set forth in Education Code sections 52060(d) and 52066(d), as applicable.</p>	<p>Reject: Pursuant to <i>EC</i> sections 52060 and 52066, LEAs must include every metric and objective set forth in statute for each state priority with the exception of metrics that are not applicable to the particular LEA (for example an elementary school district would not report graduation rates). The definition of “required metric” is now in the LCAP template to provide additional clarity in the instructions</p>

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	Cindy Marten, Superintendent, San Diego Unified California School Boards Association	As written, this definition can be interpreted to suggest that LEAs will be required to use <i>all</i> metrics included in the statutory provisions in the Education Code related to each state priority. This may be a requirement that may not be appropriate in all circumstances, and LEAs may also choose to establish locally defined metrics. Clarify this definition be clarified to require that “only those metrics that are applicable for each state priority are required.”	for the goal table. The commenters’ suggested language would give an LEA an option to choose only the metrics it would like to include in its LCAP to measure progress on state priorities. LEAs are authorized to identify and report locally identified metrics in addition to the required metrics.
13	Peter Birdsall, California County Superintendents Educational Services Association	15495(g) No specific language requested: Support the addition of the proposed section 15495(g) that defines “Required Metric.” This addition will help provide clarity for the LEAs when they are determining the different metrics for each of their goals as aligned to the state priorities. This addition will also enhance the review of the LCAPs by the county offices of education, as the “required metric” will be a key component of each LEA’s plan.	This commenter supports the definition of “Required Metric” which is now included in the proposed revised LCAP template. See response to comment #12.
14	Leslie L. DeRose, Board Member, Pajaro Valley Unified School District Wendy Benkert Ed.D. Associate Superintendent of Business Services,	15496(b)(1)(B), (b)(2)(B), (b)(3)(B), and (b)(4)(B): Delete the word “principally” from the referenced sections. Use of this term makes the result less transparent, may limit use of funds to best serve students and distracts from the goal to improve pupil outcomes and close gaps in achievement.	Reject: The term “principally” applies to the description of services that must be provided when funds apportioned on the basis of the number and concentration of unduplicated pupils are used for services on a districtwide

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	<p>Orange County Department of Education. Niccole Childs, Board President, Hesperia Unified School District Sherri Reusche, Board Member, Calaveras Unified School District Kimberly Rodriguez, Association of California School Administrators</p> <p>Cindy Marten, Superintendent San Diego Unified</p> <p>Eric Premack, Charter Schools Development Center</p>	<p>Delete the words “principally...and are effective in” and maintaining the sentence as it was written in the emergency regulations, so that the sentence would read, “<i>Describe in the LCAP how such services are directed towards meeting the district’s goals for its unduplicated pupils in the state priority areas.</i>”</p> <p>No specific language is recommended, comment expresses general concern over the addition of the words “principally...and are effective in”. The terms are vague and impractical.</p>	<p>or schoolwide basis. It provides additional clarity and does not limit the use of funds beyond the current expenditure regulations set forth in section 15496(b). Inclusion of the term “principally” is consistent with EC 42238.07 and existing language of proposed sections 15496(b)(1)(B), (b)(2)(B), (b)(3)(B), and (b)(4)(B), that such services are intended to benefit unduplicated pupils, though they may be provided on a districtwide or schoolwide basis as specified in the proposed sections.</p>
15	<p>Oscar Cruz President and CEO of Families in Schools Jackie Thu-Huong Wong, Director Foster Ed, National Center for Youth Law Civil Rights Coalition</p>	<p>15496(b)(1)(B), (b)(2)(B), (b)(3)(B), and (b)(4)(B):</p> <p>Retain the 5 words, “principally” and “and are effective in” in the above-referenced sections. This amendment to the regulations will still enable districts to be innovative while fostering robust conversations at the local level on how to best serve high need pupils.</p>	<p>These commenters support the language of proposed sections 15496(b)(1)(B), (b)(2)(B), (b)(3)(B), and (b)(4)(B). Therefore, no response is necessary.</p>

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	<p>Debra Brown, Associate Director, Children Now Annie Fox, PICO California Ron Rapp, California Federation of Teachers Steve Nelson, Trustee, Mountain View Whisman School District Valerie Cuevas Interim Executive Director The Education Trust–West Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education Kristine Andarmani Hillary Martinez Sheedy Dedashti Kim Miles</p>		
16	Angela Sims	<p>15496(b)(1)(B), (b)(2)(B), (b)(3)(B), and (b)(4)(B):</p> <p>Keep 8 words (reference to comments proposed in 45 day public comment period). Retain the term “principally” and “and are effective in” in the referenced sections, add “serving unduplicated pupils”. This amendment to the regulations will still enable districts to be innovative while fostering robust conversations at the local level on how to best serve high need pupils.</p>	<p>Reject: Addition of the suggested phrase “serving unduplicated pupils” is unnecessary because it is redundant.</p>

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17	California School Finance Reform Coalition	<p>15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B), and (b)(5)(B):</p> <p>Support the use of the term “principally” as proposed in the regulations, add specific language to include local priority areas and additional detail on the description required as follows:</p> <p>(1)(B), (2)(B), (3)(B) and (4)(B): Describe in the LCAP how such services are principally directed towards, and are effective in, meeting the district’s goals for its unduplicated pupils in the state <u>and any local</u> priority areas. <u>The description may include alternatives considered, research, experience, or educational theory that informs the choice of services.</u></p> <p>(5)(B): Describe in the LCAP how such services are principally directed towards, and are effective in, meeting the county office of education’s or charter schools goals for its unduplicated pupils in the state and any local priority areas, as applicable. <u>The description may include alternatives considered, research, experience, or educational theory that informs the choice of services.</u></p>	<p>Partially Accept: The language of proposed sections 15496(b)(1)(B), (b) (2)(B), (b)(3)(B) and (b)(4)(B) was revised to include local priority areas, as follows:</p> <p><u>“Describe in the LCAP how such services are principally directed towards, and are effective in, meeting the district’s goals for its unduplicated pupils in the state and any local priority areas.”</u></p> <p>In addition, proposed sections 15496(b)(2)(C) and (b)(4)(C), were revised to include local priority areas, as follows:</p> <p><u>“Describe how these services are the most effective use of the funds to meet the district’s goals for its unduplicated pupils in the state and any local priority areas.</u></p> <p>Partially Reject: Addition of suggested language to proposed regulations sections 15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B) and (b)(5)(B) to permit descriptions of how a choice of services is made is unnecessary when enrollment of unduplicated pupils meets or exceeds the thresholds specified in the proposed regulations and in the case of county offices of education, which serve unique populations and pupils and whose programs to serve those pupils vary significantly.</p>

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18	California School Boards Association	<p>15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B):</p> <p>(1)(B), (2)(B), (3)(B) and (4)(B): Describe in the LCAP how such services are principally directed towards, and are effective in, meeting the district's goals for its unduplicated pupils in the state <u>and any local</u> priority areas. <u>The description may include supporting research, experience, or educational theory.</u></p>	<p>Partially Accept: The language of proposed sections 15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B) was revised to include “ <u>and any local</u> priority” as described in response to comment #17.</p> <p>Partially Reject: The suggestion to delete the term “principally” is rejected for the reasons set forth in response to comment #14.</p> <p>Addition of the suggested language regarding description of supporting research, experience, or educational theory is rejected for the reasons set forth in response to comment #17.</p>
19	Cheryl Ingham, Humboldt County LCAP Lead	<p>15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B) and (b)(5)(B), no specific language requested:</p> <p>The term “principally” allows for local interpretation, COEs should be instructed to accept LCAPs that indicate how funds will be used “principally” for an identified group if LEA stakeholders and the governing board have approved the descriptions.</p>	<p>Reject: Directing County Offices of Education to accept or reject LCAPs as described by the commenter is beyond the scope of regulations.</p>
20	California School Finance Reform Coalition	<p>15496(b)(2)(C) and (b)(4)(C):</p> <p>Amend language to add flexibility as follows:</p> <p>(b)(2)(C) and (4)(C): Describe how these services are the most effective use of funds to meet the district's goals for its unduplicated pupils in the state priority areas. The description shall include provide the basis for this determination, including, but not limited to, any alternatives considered and any supporting research, experience, or educational theory</p>	<p>Partially Accept: Proposed regulation sections 15496(b)(2)(C) and (b)(4)(C) are revised to substitute “provide” in place of “include,” as follows:</p> <p><u>Describe how these services are the most effective use of the funds to meet the district's goals for its unduplicated pupils in the state and any local priority areas. The description shall include provide the basis for this</u></p>

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	California School Boards Association	<p><u>which may include a description of alternatives considered, research, experience, or educational theory that informs the choice of services.</u></p> <p>(b)(2)(C) and (4)(C): Describe how these services are the most effective use of funds to meet the district’s goals for its unduplicated pupils in the state priority areas. The description shall include the basis for this determination, including, but not limited to, <u>which may include</u> any alternatives considered, and any research, experience, or educational theory.</p>	<p><u>determination, including, but not limited to, any alternatives considered and any supporting research, experience, or educational theory.”</u></p> <p>Partially Reject: The commenters’ suggestion to remove “including, but not limited to” and add “which may include” would eliminate the proposed regulation’s requirement that an LEA select at least one option from the list and would instead allow the LEA to use any description they so choose. The proposed change would weaken the requirement that LEAs add this description when they provide services on a districtwide or schoolwide basis and are under the enrollment thresholds specified in the regulations.</p>
21	Eric Premack, Charter Schools Development Center	<p>15496(b)(2)(C) and (b)(4)(C) No specific language recommended:</p> <p>The addition of “include the basis for this determination including, but not limited to, any alternatives considered and any supporting research, experience, or educational theory” adds considerably to the length and complexity of the LCAP, likely making it less comprehensible. It is not required by statute and is burdensome.</p>	<p>Reject: This referenced language of proposed regulation sections 15496(b)(2)(C) and (b)(4)(C) further defines the description required to demonstrate that selected services are the “most effective” use of funds to meet goals for unduplicated student when an LEA under the enrollment threshold specified in regulations provides services districtwide or schoolwide pursuant to the regulations.</p>

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22	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15496 (b)(2):</p> <p>Replace existing 15496(b)(2) with the following to ensure that the same requirements apply to county offices and school districts. This would also limit the use of supplemental and concentration funds for districtwide or schoolwide purposes to LEAs, including county offices of education, over the 55% districtwide threshold or 40% schoolwide threshold for unduplicated student enrollment. Finally this would apply the standard formerly required only of those LEAs below the threshold to describe how this is the “most effective” use of funds to LEAs above the thresholds.</p> <p>“(b)(2): A school district or county office of education that has an enrollment of unduplicated pupils of more than 55 percent of the district’s, county office of education’s total enrollment, or a district or county office of education that has an enrollment of unduplicated pupils of more than 40% school site with more than 40 percent of the school sits total enrollment in the fiscal year for which an LCAP is adopted or in the prior year may expend supplemental and concentration grant funds on a district wide basis shall do all of the following:</p> <p>(a) Identify in the LCAP those services that are being funded and provided on a district wide basis.</p> <p>(b) Describe in the LCAP how such services are principally directed towards, and are effective in, meeting the district’s goals for its unduplicated pupils in the state eight priority areas.</p> <p>(c) Describe how these services are the most effective use of the funds to meet the district’s goals for its unduplicated pupils in the state priority areas. The description shall include the basis for this determination, including, but not limited to, any alternatives considered and any supporting research, experience or educational theory.</p>	<p>Reject: Statute does not specify a minimum threshold for districtwide, charterwide, countywide, or schoolwide use of funds.</p> <p>The commenters’ suggested thresholds would limit LEAs’ ability to locally determine use of supplemental and concentration funds; proposed regulations require additional description of funded services when district or school enrollment of unduplicated pupils is below levels specified in the proposed regulations.</p> <p>County offices of education serve unique populations of pupils. The needs of those pupils and the programs operated by county offices of education to serve those pupils necessarily vary significantly within and across county offices of education. Thus, it is not appropriate to prescribe a particular threshold and higher standard of effectiveness for county offices of education.</p>

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		<p>15496(b)(3), (b)(4) and (b)(5):</p> <p>Delete these sections, LEAs under the 55% districtwide threshold or 40% schoolwide threshold for unduplicated student enrollment should not have the option of using supplemental and concentration funds for districtwide or schoolwide purposes.</p> <p>15496 No specific language required:</p> <p>Establish criteria for determining whether a service meets the standards for “most effective use of funds”. These criteria should track the requirements of the Title I and Title III regulations, as anticipated by the statute, and require that expenditures be based on strategies that specifically address the purpose of the supplemental and concentration grant funding as well as the eight state priorities.</p> <p>Establish stronger provisions stating that supplemental and concentration funds can be used for district wide and school wide services only if the service demonstrably provides a differential benefit to unduplicated pupils by showing an actual increase or improvement of services to unduplicated pupils that promotes priority goals for those subgroups, also benefiting the general student population. This is necessary to ensure use of the funds in a manner that addresses unduplicated pupil achievement, goals and priorities as required by Sections 52052, 52060, and 52066.</p> <p>15496(b):</p> <p>Insert after “funded” the words “from all sources, including</p>	<p>Reject: Commenters’ suggestion to establish criteria for “most effective use of funds” that track Title I and Title III criteria would add restrictive criteria which are inconsistent with the statute’s intended flexibility for LEAs to implement locally-determined strategies and services to improve outcomes for unduplicated pupils in the state priority areas. The proposed regulations at sections 15496(b)(1)(B), (b)(2)(B), (b)(3)(B), (b)(4)(B) and (b)(5)(B) require LEAs to describe how services are principally directed towards, and effective in, meeting the district’s goals for unduplicated pupils in the state priorities and in local priorities. In addition, the proposed regulations at sections 15496(b)(1)(B), (b)(2)(C) and (b)(4)(C) require school districts to describe how these services are the most effective use of funds, and to provide the basis for that determination, as specified.</p> <p>Reject: Education Code section 42238.07 provides the SBE with the authority to adopt</p>

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	Name/Agency (Commenter)	Title 5 Regulation Section and Public Comment	Agency Response
		<p>federal funding”, in (b)(1)(A) [pg 5, line 16], (b) (2)(A) [pg 5, line 26]; (b)(3)(A) [pg 6, line 11]; (b)(4)(A)[pg 6, line 21] and (b)(5)(A) [pg 7, line 4].</p> <p>Delete “such” on line 3, pg 4 and replace with “from all sources of funds, including federal funds, and description of services provided pursuant to this section.”</p>	<p>regulations governing expenditure of LCFF funds. Federal funds are governed by federal law and regulations. Insertion of language related to all fund sources goes beyond the scope of the LCFF statute and these regulations.</p>
23	Annie Fox, PICO California	<p>15497 No specific language requested:</p> <p>The COE oversight section is narrowed to one aspect of the review and is confusing to the field.</p>	<p>Accept: See response to comment #24.</p>
24	Civil Rights Coalition	<p>15497:</p> <p>“In making the determinations required under Education Code section 52070(d)(3), the county superintendent of schools shall include review of any descriptions of districtwide services provided pursuant to section 15496(b)(1) or section 15496(b)(2) or descriptions of schoolwide services provided pursuant to section 15496(b)(3) or section 15496(b)(4) when determining whether the school district has fully demonstrated that it will increase or improve services for unduplicated pupils pursuant to section 15496(a).”</p> <p>Alternatively, delete this sentence.</p>	<p>Accept: Proposed regulations section 15497 is revised to clarify that the COE oversight extends to all LEAs providing districtwide or schoolwide services, as follows:</p> <p><u>“In making the determinations required under Education Code section 52070(d)(3), the county superintendent of schools shall include review of any descriptions of districtwide or schoolwide services provided pursuant to sections 15496(b)(1) through (b)(4) 15496(b)(2) or descriptions of schoolwide services provided pursuant to section 15496(b)(4) when determining whether the school district has fully demonstrated that it will increase or improve services for unduplicated pupils pursuant to section 15496(a).”</u></p>

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	Name/Agency (Commenter)	Title 5 Regulation Section and Public Comment	Agency Response
25	Valerie Cuevas Interim Executive Director The Education Trust–West	<p>15497:</p> <p>Add section (b) to ensure COEs monitor compliance with prior year expenditures in the proportionality calculation:</p> <p><u>“(b) The expenditures included in the estimate of the amount of LCFF funds expended by the LEA on services for unduplicated pupils in the prior year that is in addition to what was expended on services provided for all pupils pursuant to section 15496 (a) (2). If a county superintendent of schools does not approve an LCAP because the school district has failed to meet the requirement to appropriately calculate the percentage by which services for unduplicated pupils must be increased or improved above services provided to all pupils in the fiscal year, it shall provide technical assistance to the school district in meeting that requirement pursuant to Education Code section 52071.”</u></p>	<p>Reject: The suggested additions are not necessary. <i>EC</i> 52070 requires a county office of education to ensure a school district adheres to the LCAP template adopted by the SBE, adopts a budget that includes expenditures sufficient to implement the actions and strategies in the LCAP, and adopts an LCAP that adheres to the LCFF expenditure regulations adopted by the SBE. This process would include a review of the accuracy of the LEA’s calculations of proportionality, with the understanding that best estimates available at the time of LCAP adoption are utilized. Statute also requires the county office of education to provide technical assistance to school districts when it disapproves an LCAP.</p>
26	Cheryl Ingham, Humboldt County LCAP Lead	<p>15497 No specific language requested:</p> <p>Resist any changes to COE oversight, COEs can check technical aspects of the LCAP but should not weigh in on appropriateness of actions, this responsibility lies with the LEA and local stakeholders.</p>	<p>Accept: See response to comment #24.</p>
27	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497 No specific language requested:</p> <p>Clarify and strengthen COEs authority to review LCAPs & aligned budgets for the purposes of determining whether federal funds were appropriately used.</p>	<p>Reject. The suggested changes are beyond the scope of this rulemaking. Statute (<i>EC</i> 52070) states the requirements for county office of education review of LCAPs. In</p>

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		<p>Other/ No specific language requested:</p> <p>These regulations should also make clear that CDE has responsibility to monitor the COE's, Districts and Charter schools both as to the LCFF compliance with respect to their obligations to subgrantees as specified in Sections 3113-3116, 3121-3022 and 3302 of the ESEA: EDGAR 34 CFR 80.40. The current regulations do not address this important oversight requirement and should be revised to add a new section doing so.</p>	<p>addition, EC section 42238.07 provides the SBE authority to adopt regulations governing expenditure of LCFF funds. Compliance with requirements related to federal funds is governed by federal law and regulations and is outside the scope of these regulations.</p>
28	<p>California School Finance Reform Coalition</p> <p>Valerie Pitts, Ed.D. Superintendent Larkspur-Corte Madera School District</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>No specific language requested:</p> <p>Recommend that SBE reject changes to the LCAP template made at the July SBE meeting and retain the emergency regulations version of the LCAP template and convene a stakeholder working group to inform changes to a template at a later date.</p> <p>Recommend that SBE reject changes to the LCAP template made at the July SBE meeting and retain the emergency regulations version of the LCAP template and make changes after the first round of state student performance data is available.</p>	<p>Reject: The LCAP template in proposed section 15497.5 is revised to improve clarity. See responses to comments #49 and #53.</p>
29	<p>Vincent Matthews, San Jose Superintendent of Schools</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>No specific language requested:</p> <p>Reduce the legal language in the main LCAP template, using an appendix for references (remove Education Code references and</p>	<p>Reject: Statute requires LEAs to adhere to the template to obtain approval of an LCAP, so some legal language is necessary. In addition, the LCAP template (proposed</p>

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	Name/Agency (Commenter)	Title 5 Regulation Section and Public Comment	Agency Response
		language shall/pupils) to increase readability and understanding for stakeholders.	regulation section 15497.5) is revised to make it more readable and understandable to stakeholders. See responses to comments #49 and #53.
30	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>No specific language requested:</p> <p>The following sentence from the LCAP Introduction should include a reference to the ESEA Title III, Part A, 3102, this would be consistent with the explicit reference to Title I already contained in the language:</p> <p>“The information contained in the LCAP, or annual update, may be supplemented by information contained in other plans (including the LEA plan pursuant to Section 1112 of Subpart 1 of Part A of Title I of Public Law 107-110) that are incorporated or referenced as relevant in this document.”</p> <p>In the State Priorities section of the LCAP, the description of Pupil Outcomes should include a sentence stating:</p> <p>“Pupils outcomes and other pupil outcomes shall be disaggregated by unduplicated pupil for the purpose of showing performance or progress by these pupils”.</p>	Reject: Not necessary because the instructions for the Goal Table in the revised LCAP template, Section 2, “Expected Annual Measurable Outcomes” require identification and description of specific expected outcomes for all pupils and, where applicable, for specific subgroups.
31	Peter Birdsall, California County Superintendents Educational Services Association	<p>No specific language requested:</p> <p>Recommend that the terminology and verbiage used in proposed section 15497.5 (LCAP Template) be aligned to the Proposed</p>	Accept: The proposed guiding question #12 in Section 2 of the proposed LCAP template

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		<p>Regulations for LCFF. Currently there is incoherence between the two that will lead to confusion in the field. An example of this can be found on page seven of the LCAP Template in which question 12 outlines “performance indicators” as opposed to the “required metric” description outlined in the regulations.</p>	<p>in section 15497.5 is revised as follows: <u>“12) How do these actions/services link to identified goals and expected measurable outcomes performance indicators?”</u></p>
32	<p>California School Finance Reform Coalition Eric Premack, Charter Schools Development Center</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>If the recommendation to return to the LCAP template adopted through emergency regulations is not adopted, then recommend deleting from the Introduction, as follows:</p> <p>“However, the narrative response and goals and actions should demonstrate each guiding question was considered during the development of the plan.”</p>	<p>Reject: The commenters note that this language contradicts the previous sentence which states that no narrative response is required for a guiding question. However, this language does not impose a new requirement, but instead recommends guiding questions be considered and answers reflected as the LEA deems appropriate.</p>
33	<p>California Science Teachers Association Form Letter #1 Form Letter #2 Form Letter #3 Debra Brown, Associate Director, Children Now Valerie Cuevas Interim Executive Director The Education Trust–West</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Address all fields and standards in the LCAP, in particular the Next Generation Science standards.</p> <p>Amend language as follows:</p> <p>implementation of <u>all</u> academic content and performance standards and English language development standards adopted by the state board, <u>including common core state standards (CCSS), next generation science standards (NGSS), English language development standards (ELD), career technical</u></p>	<p>Reject: <i>EC</i> sections 52060 and 52066 do not list all specific state board adopted standards. Instead, the statutes generally reference adopted standards. Accordingly, it includes all the adopted standards. The language of proposed regulation section 15497.5 reflects statute.</p> <p>However, this is an area SBE and CDE staff will continue to work on clarifying through communications on the CDE and SBE websites.</p>

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	<p>California Task Force on K-12 Civic Learning Cecelia Mansfield California State PTA</p>	<p><u>education standards (CTE), history-social science, visual and performing arts, health education, world language, model school library, and physical education standards</u>, for all pupils, including English learners. (Priority 2)</p> <p>Suggested variations on the above language:</p> <p>Specifically state CCSS, ELA, mathematics, ELD, and NGSS. Specifically state CCSS, ELA, ELD, and NGSS. Specifically state CCSS, ELD, and NGSS.</p> <p>Additional variation:</p> <p>Include History Social Science Standards and a reference to civic learning:</p> <p>Implementation of State Standards: implementation of academic content and performance standards and English language development standards adopted by the state board for <u>all subjects, including the Common Core State Standards (CCSS), English Language Development (ELD) standards, Next Generation Science Standards (NGSS), and California History-Social Science Standards, to prepare</u> all pupils, including English learners, <u>for college, career and civic life.</u> (Priority 2)</p> <p>Also received comments on general support for science education and language that identifies NGSS specifically but no specific suggested language.</p>	
34	<p>Annie Fox, PICO California Civil Rights Coalition Cynthia Rice, CRLA</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template] No specific language requested.</p> <p>Support clarification of English Language Development Standards</p>	<p>Letter of support; no response is necessary.</p>

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	Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	as part of the state standards.	
35	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template] No specific language requested.</p> <p>The first paragraph of Section 1 should include references to Education Code sections 52060(g) and 52066(g) to ensure the public knows the ways the LCFF authorizes parents and students to participate.</p>	<p>Accept: The first paragraph of the instructions for Section 1 is revised as follows:</p> <p><u>Meaningful engagement of parents, pupils, and other stakeholders, including those representing the subgroups identified in Education Code section 52052, is critical to the LCAP and budget process. Education Code sections 52060(g), 52062 and 52063 specify the minimum requirements for school districts; Education Code sections 52066(g), 52068 and 52069 specify the minimum requirements for county offices of education, and Education Code section 47606.5 specifies the minimum requirements for charter schools. In addition, Education Code section 48985 specifies the requirements for translation of documents.</u></p>
36	Oscar Cruz, President and CEO, Families in Schools	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Amend the instructions section to ensure that the broad use of parents is not limited to the parent advisory committee, as follows:</p> <p>Instructions: Describe the process used to consult with parents, parent advisory committees, pupils, school personnel, school</p>	<p>Reject: The proposed changes are not necessary. The instructions for the proposed LCAP template accurately reflect the statute regarding consultation with parents.</p>

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		<p><u>site councils</u>, local bargaining units and the community and how this engagement contributed to development of the LCAP or annual update.</p>	
37	<p>Oscar Cruz, President and CEO, Families in Schools Civil Rights Coalition Student Voice Coalition</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Amend guiding question #6 in section 1 as follows:</p> <p>6) What specific actions were taken to consult with pupils, <u>including unduplicated pupils</u>, to meet the requirements 5 CCR 15495(a)?</p>	<p>Reject: The suggested change is not necessary. The phrase “consult with pupils” is defined in proposed regulation section 15496(a), which is revised to reference “unduplicated pupils” as set forth in response to comment #3.</p>
38	<p>Colin Miller, California Charter Schools Association</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Amend the instructions section to more accurately reflect statute as follows:</p> <p>“Describe the process used to consult with parents, pupils, school personnel, local bargaining units and the community <u>applicable stakeholders as referenced above</u> and how this engagement contributed to development of the LCAP or annual update.”</p> <p>Amend guiding question 1 as follows:</p> <p>1) How have parents, community members, pupils, local bargaining units, and other <u>applicable</u> stakeholders (e.g., <u>parents, community members, pupils, local bargaining units, and other stakeholders</u>, LEA personnel, county child welfare agencies, county office of</p>	<p>Partially Accept: The instructions in the proposed LCAP template, Section 1, are revised as follows: <u>Describe the process used to consult with parents, pupils, school personnel, local bargaining units as applicable, and the community and how this engagement consultation contributed to development of the LCAP or annual update.</u></p> <p>Amend Section 1, guiding question #1 as follows:</p> <p><u>How have parents, community members, pupils, local bargaining units, and other applicable stakeholders (e.g., parents and pupils, including parents of unduplicated</u></p>

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		<p>education foster youth services programs, court-appointed special advocates, foster youth, foster parents, education rights holders and other foster youth stakeholders, English learners, English learner parents, community organizations representing English learners, low income youth, and others as appropriate) been engaged and involved in developing, reviewing, and supporting implementation of the LCAP?</p>	<p><u>pupils and unduplicated pupils identified in Education Code section 42238.01; community members; local bargaining units; LEA personnel; county child welfare agencies; county office of education foster youth services programs, court-appointed special advocates, foster youth, foster parents, education rights holders and other foster youth stakeholders; English learners, English learner parents, community organizations representing English learners; low income youth, and others as appropriate) been engaged and involved in developing, reviewing, and supporting implementation of the LCAP? “</u></p> <p>Partially Reject: Removing the list of those with whom to consult and replacing it with the suggested reference reduces clarity. However, the note that bargaining units are not included in the groups with which charter schools are required to consult is addressed in the revised language.</p>
39	<p>Valerie Chrisman, Associate Superintendent of Educational Services, Ventura County Office of Education</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Section 1 Instructions, line 2, to be consistent with the change made from “engage” to “consult” amend as follows:</p> <p>Instructions: Describe the process used to consult with parents, pupils, school personnel, local bargaining units and the community and how this engagement consultation contributed to development of the LCAP or annual update.</p>	<p>Accept: The proposed LCAP instructions are revised as set forth in response to comment #38.</p>

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40	Cheryl Ingham, Humboldt County LCAP Lead	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Add specific sections to LCAP Section 1 – Engagement:</p> <p>Add new subheadings to the chart in Section 1 of the template:</p> <ul style="list-style-type: none"> • Dates of Meetings • Audience (or, Group(s) attending) • Summary of progress - from prior year that was provided to attendees • Recommendations collected from group <p>Under Impact column add:</p> <ul style="list-style-type: none"> • Changes made to LCAP based on input from meeting, such as: <ul style="list-style-type: none"> ○ Goals revised ○ Targets for progress adjusted ○ New actions ○ Deletions 	<p>Reject: Addition of the suggested specific sections in the proposed LCAP template, Section 1, are not necessary. They may inhibit an LEA's narrative and require unnecessary and burdensome reporting. In addition, LEAs' compliance with statutory requirements for the LCAP process is currently included in the audit guide and will be reviewed as part of annual audits.</p>
41	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Add specific requirements to LCAP Section 1 – Engagement:</p> <p>Include districts listing what recommendations offered by the</p>	<p>Reject: The suggested edits are not necessary. The addition of the proposed additional requirements may lead to LEAs</p>

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		<p>parent advisory committees, specifically the DELAC committees, were included in the LCAP and which were rejected by the local governing body and by the superintendent.</p> <p>Additionally, the LCFF statute requires that the school superintendent respond in writing to the DELAC members regarding their LCAP recommendations. Include verification that this occurred and a summary of the superintendent response.</p> <p>Add a sentence in the instructions referencing Education Code section 52062(a)(2) and the requirement that the school district superintendent present the LCAP to the English learner parent advisory committee and to respond to their comments in writing to ensure districts understand this is a requirement and COEs review this. In addition a guiding question should be added reflecting this requirement.</p> <p>Amend Guiding Question #4 (this is possibly a reference to #3) as follows:</p> <p>“3) What information (e.g., quantitative and qualitative data/metrics <u>on pupils, including duplicated pupils</u> was made available to stakeholders related to the state priorities and used by the LEA to inform the LCAP goal setting process? How was the information made available?</p>	<p>including unnecessary and lengthy information regarding process that would detract from the transparency of the changes to be implemented through the goals, actions, and expenditures.</p> <p>Reject: The question is purposefully broad in scope to consider all students and, as applicable, specific subgroups.</p>

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42	Cheryl Ingham, Humboldt County LCAP Lead	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Remove instructions, guiding questions, and “appendix” from the LCAP template. Include them in a separate, companion document.</p>	<p>Reject: Instructions and guiding questions are provided before each table to ensure LEAs fill out the tables with the appropriate instructions and context in mind. However, this area may be further explored in the future in connection with creation of an electronic template.</p>
43	Cheryl Ingham, Humboldt County LCAP Lead	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Number required metrics to correspond to State Priorities, i.e. Priority 1, metrics 1.1, 1.2, 1.3, etc. and use these in section tables to identify which metrics are addressed by which goal.</p>	<p>Reject: The LCAP template is intended to allow an LEA to comply with statute and regulations and provide a transparent, narrative document to share with all stakeholders. Additional coding that requires stakeholders to search for appendices to understand how a goal is measured or addressed would take away from this purpose.</p>
44	<p>Debra Brown, Associate Director Children Now</p> <p>Brian Lee, State Director Fight Crime, Invest in Kids California</p>	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Require the reporting of baseline data for all standardized metrics for which baseline data is available.</p> <p>See the proposed template to collect and summarize this information in a transparent format from Children Now, includes: a list of all required LCAP metrics with columns indicating LEA wide, school or subgroup and anticipated outcome for each year of the next 4 year period.</p> <p>The LCAP template should require the reporting of baseline data for all metrics for which baseline data is available. This would ensure transparency around the starting point that progress towards goals is measured against.</p>	<p>Reject: Optional reporting, collection, and display of this data may be explored in the future in connection with creation of an electronic template.</p>

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45	Civil Rights Coalition Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Amend Table 2 instructions to read:</p> <p>“Furthermore, the LCAP should be <u>developed in consultation with</u> school site level advisory groups (e.g., school site councils, English Learner Advisory Councils, pupil advisory groups, etc.) <u>and be consistent with and reflective of the school site priorities and plans</u> to facilitate alignment between school-site and district-level goals and actions.”</p> <p>In addition to the above language, CRLA, Californians Together and CABE recommend that the language commencing with “Furthermore, the LCAP should be developed in consultation with” should include district level committees including the English learner parent advisory committee.</p>	<p>Reject: The suggested changes are not necessary. The regulations as proposed provide for appropriate consultation consistent with statute.</p>
46	Civil Rights Coalition Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Add the following language to Table 2 instructions:</p> <p>“Because the state priorities broadly cover an LEA’s work to support its students and achieve outcomes, almost all LEA expenditures should be listed and described as a consequence of being tied to the actions that support an LEA’s goals for each of</p>	<p>Partially Accept:</p> <p>The fifth paragraph of the introduction to the proposed LCAP template is revised to include:</p>

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		<p>the state priorities. In crafting goals, specific actions, and expenditures, LEAs should carefully consider how to reflect the services and related expenses for their basic instructional program in relationship to the state priorities. The LCAP should reflect how all LCFF funds are being spent.”</p> <p>Add guiding question #14:</p> <p><u>“14) Do the LEA’s goals, services, and related expenses reflect almost all of the LEA’s expenditures, including all LCFF funding?”</u></p> <p>Modify the Instructions for Section 2 of the LCAP under “Actions/Services and Related Expenditures” to read: “Left Column: Identify all annual actions to be performed and services provided. . . ” and “Right Column: Identify all annual actions to be performed and services provided. . . .”</p>	<p><i><u>Accordingly, in developing goals, specific actions, and expenditures, LEAs should carefully consider how to reflect the services and related expenses for their basic instructional program in relationship to the state priorities.</u></i></p> <p>Reject: The suggested guiding question #14 is unclear; the term “almost all” may create confusion.</p>
47	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>In order to ensure the appropriate uses of the LCFF funds and federal funds, the Instructions section should clearly state supplemental or concentration funds used for district wide, schools wide or county wide purposes, must not supplant Title I or Title III funds.</p>	<p>Reject: Supplanting of federal funds is addressed from the perspective of, and pursuant to requirements specific to, federal programs.</p>

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48	Eric Premack, Charter Schools Development Center	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The instructions and revised goals table in section 2 state that it “must include all metrics as applicable,” which is vague and/or incorrect. This should be revised to clearly note that charter schools need not include all metrics if they are not applicable to the charter school’s program, grades served, and/or if the metric relates to a law that is not explicitly applicable to charter schools. The same should be done with respect to the annual update table.</p>	<p>Reject: The instructions for the goal table in the proposed LCAP template, Section 2, as revised, reflect statute by requiring that all metrics be addressed, as applicable to an LEA (e.g., an elementary school district, or a charter serving only elementary school students would not provide a graduation rate). As specified in <i>EC</i> sections 47605 and 47605.6, a charter school need only address the state priorities specified in <i>EC</i> section 52060 that apply for the grade levels served, or the nature of the program operated, by the charter school.</p>
49	Valerie Chrisman, Associate Superintendent of Educational Services, Ventura County Office of Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The instructions for section 2 should have directions for all parts of the section 2 table, having some but not all is confusing.</p> <p>Does the new template accommodate including an overarching goal, with multiple outcomes with different actions and services.</p> <p>In section 2, guiding question number 12, the term performance indicators should be clarified, does this mean metrics?</p> <p>In the table, expected annual outcomes line is unclear, do the metrics connected to the goal go in that box or do you list the metrics in the second row and the expected changes in the third</p>	<p>Partially accept: The instructions, tables, and guiding questions in the proposed LCAP template, Section 2, are revised to provide greater clarity and transparency regarding the presentation of related goals, expected measurable outcomes, and actions/services and expenditures, as well as the scope of services and pupils, including pupil subgroups, served. The information in the Section 2 goal table is revised to reflect a vertical alignment by LCAP year. The revised instructions include headings and instructions for each part of the goal table.</p> <p>The instructions with the heading “Expected Measurable Outcomes” clarify where and how expected annual measurable outcomes should be identified.</p> <p>In addition, the proposed LCAP template,</p>

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		<p>row? Clarification is needed in chart or instructions.</p> <p>Reviewers need to find the metrics easily. Correct this by including a description of lines 2 and 3 of the table that tell the writers to include the metrics. As it now stands line 2 looks like a general caution that all metrics must be included and it's not clear where.</p> <p>In section 2, guiding question number 13 asks where "expenditures can be found in the LEA's budget", but in the table it asks for budgeted expenditures, the guiding question should refer to both</p> <p>In the section 2 table line 4 is very awkward- "Describe the need(s) identified, including a description of the supporting data, to develop the goal"? Here are some choices- not sure they are better but it gives an idea of the change that is needed.</p> <p>"Describe the specific data used and the needs that data surfaced which resulted in the identification this goal. "</p> <p>"Describe how this goal was identified using the data, and the identified need the data illuminated."</p> <p>"Detail the data and subsequent needs that led to the identification of this goal."</p> <p>Section 3A is much better than the old 3C and will be easier for the districts to understand.</p>	<p>Section 2, guiding question #12 in 15497.5 is revised to read, as follows:</p> <p><u>"12) How do these actions/services link to identified goals and performance indicators expected measurable outcomes-performance indicators?"</u></p> <p>Reject: The instructions for the proposed LCAP template, Section 2, under the heading "Budgeted Expenditures," specify that both the budgeted expenditures and where they can be located must be identified.</p> <p>Partially accept: The proposed LCAP template, Table 2, goal table instructions under the heading "Identified Need" are revised as follows: <u>"Describe the need(s) identified by the LEA that this goal addresses, including a description of the supporting data, used to identify the need(s) develop each goal."</u></p> <p>The commenter supports the revisions to the LCAP template, section 3A; thus no response required.</p>

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		<p>amending language on identified need in the LCAP Table 2 Instructions as follows to reduce unnecessary amount of text added to the LCAP:</p> <p>“Identified Need: Describe the need(s) identified, including a description of the supporting data, to develop each goal.”</p>	<p>instructions regarding “Identified Need” were revised to improve clarity as set forth in response to comment #49 above.</p>
52	California School Boards Association	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Recommend amending language on identified need in the LCAP Table 2 Instructions as follows to reduce unnecessary amount of text added to the LCAP:</p> <p>“Identified Need: Describe the need(s) identified, which may include including a description of the supporting data used to develop each goal.”</p>	<p>Reject: The language which the commenter suggests amending is necessary for the reasons specified in response to comment #51.</p>
53	Cindy Marten, Superintendent, San Diego Unified	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template] No specific language required:</p> <p>The description of actions, services, and outcomes should be the focus of the LCAP, not expenditures as the new template seems to suggest.</p> <p>The layout of the revised LCAP template suggests the columns for the actions and services provided to all students (first column for LCAP Year 1 subgroups, schools or level of services) should be aligned with the actions and services provided to the unduplicated students (second column for LCAP Year 1 schools or level of service) since the lines read across. This current structure does not seem to acknowledge the reality of districtwide approaches.</p>	<p>Partially accept: The instructions, tables, and guiding questions in the proposed LCAP template, Section 2, are revised to provide greater clarity and transparency as set forth in response to comment #49.</p> <p>Partially reject: The goal template does not require reporting of more detailed expenditure information. The annual update table does require an LEA to provide information related to whether or not an LEA implemented the plan for actions and expenditures laid out in the prior year LCAP. Changes were made to clarify the language in the annual update table consistent with the changes to the goal</p>

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		<p>The layout of the revised LCAP template suggests that school districts are able to differentiate the expenditures associated with the three different unduplicated pupil subgroups (English learners, low-income and foster youth), this may not be the case for many districtwide expenditures</p> <p>The inclusion of new requirements calling for more information on expenditures fails to recognize that LEAs are allowed to use supplemental and concentration grant funds to “improve or increase services,” since the focus on expenditures is more relevant if a school district increased services. By requiring more detailed expenditures, the LCAP template, in effect, will result in the reporting of dollar amounts, but does not consider the inclusion of qualitative descriptions if the delivery of services is in fact being improved.</p>	<p>table. The LEA may still include descriptions of qualitative changes in reporting on actions to achieve a goal.</p>
54	Valerie Cuevas Interim Executive Director The Education Trust–West	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>See attached suggested Goal Table and Annual Update template from Ed Trust West. The suggested template includes:</p> <p>Changing the orientation of table 2 so that actions, services, and expenditures for unduplicated students are listed separately from and below those for all students, similar to the 2014-15 template.</p> <p>Changing the orientation of table 2 to maintain left to right descriptions of year over year actions and expenditures to avoid repetitiveness.</p> <p>Clarify that all applicable subgroups and affected schools must be addressed separately as necessary. Add language in the</p>	<p>Partially accept: The instructions, tables, and guiding questions in the proposed LCAP template, Section 2, are revised to provide greater clarity and transparency as specified in the responses to comments #49 and #53.</p> <p>The instructions for the proposed LCAP, Section 2, goal table clearly state that goals for all pupil subgroups and school sites must be included, including goals for specific subgroups and school sites as applicable.</p>

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		template boxes to ensure this.	
55	Kimberly Rodriguez, Association of California School Administrators Coalition of LEAs and statewide organizations	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Make the following changes to guiding questions for table 2:</p> <p>2) What are the LEA’s goal(s) to address state priorities related to “Pupil Outcomes, <u>“including improving deficiencies in positive outcomes for numerically significant pupil subgroups, redesignated fluent English proficient students, and unduplicated pupils (i.e., English learners, low-income, and foster youth)?”</u></p> <p>6) What are the unique goals for unduplicated pupils as defined in Education Code sections 42238.01 and <u>numerically significant</u> subgroups as defined in section 52052 that are different from the LEA’s goals for all pupils?</p> <p>7) What are the specific <u>expected</u> outcomes, metrics, <u>and measurable</u> changes associated with each of the goals annually and over the term of the LCAP?</p> <p>10) What information was considered/reviewed for <u>numerically significant</u> subgroups identified in Education Code section 52052?</p> <p>11) What actions/services will be provided to all pupils, to <u>numerically significant</u> subgroups of pupils identified pursuant</p>	<p>Partially accept: The proposed LCAP, Section 2, guiding question #7, is revised, as follows:</p> <p><u>“7) What are the specific predicted expected measurable outcomes/metrics/noticeable changes associated with each of the goals annually and over the term of the LCAP?”</u></p> <p>Reject: The phrase “improving deficiencies in positive outcomes” is unclear.</p> <p>Reject: Addition of the term “numerically significant,” because the term is already included under the reference to <i>EC</i> section 52052 and in proposed section 15495(j).</p> <p>Reject: Addition of “unduplicated students” is unnecessary because the question identifies and includes “unduplicated students” by</p>

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		<p>to Education Code section 52052, to specific school sites, to unduplicated students (English learners, to low-income pupils, and/or to foster youth) to achieve goals identified in the LCAP?</p> <p>Table 2 emphasizes the amount of funding expended on each pupil subgroup rather than the amount expended on the action/service aligned to the goal. By proposing to tie expenditures to pupil subgroups, the template creates an impossible accounting challenge that cannot be reconciled. For example, an LEA receives supplemental or concentration grant funding based on whether the pupil is either an English learner (EL), low-income (LI), or a foster youth. The LEA receives only one allocation regardless if the pupil is both an EL and LI, hence the term unduplicated. The proposed template indicates expenditures are to be detailed by subgroup and for an unduplicated pupil a dollar may be counted twice, which does not accurately reflect expenditures.</p> <p>See attached suggested goal table from the Association for California School Administrators and the Coalition of statewide organizations and administrators. The proposed table 2 includes the following changes:</p> <p>Amending the 2nd heading to read “Expected Annual Measurable Outcomes”</p> <p>Adding the term “numerically significant” to references to subgroups pursuant to Education Code section 52052.</p>	<p>referencing English learners, low-income pupils, and foster youth.</p> <p>Partially accept: The proposed LCAP template, Section 2, goal table is revised as described in response to comments #49 and #53. The revised goal table and “Budgeted Expenditures” instructions make clear that the reporting of expenditures is linked to the described action/service and not separately to each of the subgroups.</p> <p>Accept: The revised LCAP template, Section 2, goal table and annual update table include the term “measurable” as suggested.</p> <p>Reject: The term “numerically significant” is unnecessary as Education Code section 52052 and the definition of “subgroup” in proposed section 15495(j) already describes subgroups as numerically significant.</p>

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		Remove the separate right hand column that details actions and expenditures for unduplicated pupils and instead allow an LEA to check a box indicating which pupil group an action or expenditure applies to.	Partially accept: The instructions, tables, and guiding questions in the proposed LCAP template, Section 2, are revised to provide greater clarity and transparency as specified in the responses to comments #49 and #53.
56	Valerie Chrisman, Associate Superintendent of Educational Services, Ventura County Office of Education	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The detailing of budgeted vs. actual expenditures in the update section is of tremendous concern to districts and reviewers. How are County Offices of Education going to monitor without having to review two budgets now? Change “actual expenditures” to “expenditures”.</p> <p>Guiding questions under number 5 are currently in the wrong order. First, one needs to look at what changes/progress is made and how they compare to what was predicted. Then they would detail the changes which will be made after that review.</p> <p>On guiding question 5: make the following amendments:</p> <p>“5) What changes in actions, services, and expenditures will be have been made as a result of reviewing past progress and/or changes to goals? What changes/progress have been realized and how do these compare to changes/progress predicted? What modifications are being made to the LCAP as a result of this comparison?”</p>	<p>Partially reject: See revisions to the proposed LCAP template, Section 2, annual update table, described in response to comment #64 below.</p> <p>Partially accept: The LCAP template, Section 2, Annual Update Guiding questions are revised as follows: Question #5 is revised, and guiding question #6 is added:</p> <p><u>5. What progress has been achieved toward the goal and expected measurable outcome(s)? How effective were the actions and services in making progress toward the goal? What changes to goals, actions, services, and expenditures are being made in the LCAP as a result of the review of progress and assessment of the effectiveness of the actions and services? What changes in actions, services, and expenditures</u></p>

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			<p>will be made as a result of reviewing past progress and/or changes to goals? What changes/progress have been realized and how do these compare to changes/progress predicted? What modifications are being made to the LCAP as a result of this comparison?</p> <p><u>6. What differences are there between budgeted expenditures and estimated actual annual expenditures? What were the reasons for any differences?</u></p>
57	Colin Miller, California Charter Schools Association	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Add clarity to the annual update table instructions for charter schools on page 27 as follows:</p> <p>“Annual Update Instructions: For each goal in the prior year LCAP, review the progress toward the expected annual outcome(s) based on, at a minimum, the required metrics pursuant to Education Code sections 52060 and 52066 <u>and 47606.5 as applicable.</u>”</p>	<p>Reject: The education code references apply to the required metrics, not the annual update requirement, and the required metrics are not directly referenced in section 47606.5, but are applicable to charter schools by reference to section 52060 in sections 47605 and 47605.6.</p>
58	Oscar Cruz, President and CEO, Families in Schools	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>See attached suggested Goal Table and Annual Update template from Families in Schools. The proposed template includes:</p> <p>Amending table 2 and the annual update table to show three</p>	<p>Partially accept: The instructions, tables, and guiding questions in the proposed LCAP template, Section 2, are revised to provide greater clarity and transparency as specified in the responses to comments #49 and #53.</p> <p>Partially reject: The proposed LCAP template,</p>

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		years of expenditures horizontally rather than the proposed vertical alignment. Also add a prior year column to table 2 that shows the expenditures made in the prior year.	Section 2, is revised to provide greater clarity and transparency. Vertical alignment of Goals, Actions and Services, and expenditures would diminish transparency, and readability of the plan.
59	Annie Fox, PICO California Civil Rights Coalition	15497.5 [Local Control and Accountability Plan and Annual Update Template] No specific language requested. Support annual update table	Letter of support; no response necessary.
60	Cheryl Ingham, Humboldt County LCAP Lead	15497.5 [Local Control and Accountability Plan and Annual Update Template]: See attached suggested Annual Update template from the Humboldt County Office of Education. The HCOE draft would be duplicated for each goal. Sections (3a, 3B) relating to increases and improvements in services for the required groups (unduplicated count students) would be added after the goals, per suggestions below. This model is for Annual update but could also be adapted to show three year LCAP scope. The proposed template includes: A column and coding structure for an LEA to select and identify codes for each element that a goal applies to. It also includes the identification of object codes for expenditures, notes and coding on whether a goal is maintained, revised, or new, and coded metrics.	Partially Accept: The instructions, tables, and guiding questions in the LCAP template, Section 2, are revised to provide greater clarity and transparency as described in response to comments #49 and #53. The additional structure and coding proposed in this template would take away from this purpose and be more difficult for a reader, such as a parent, to understand.

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61	Leslie DeRose, Board Member, Pajaro Valley Unified School District Niccole Childs, Board President, Hesperia Unified School District Sherri Reusche, Board Member, Calaveras Unified School District California School Board Association	15497.5 [Local Control and Accountability Plan and Annual Update Template]: The subheading on the right side of the annual update table asks for "Actual Action/Services and Related Expenditures." At the time of year in which LEAs will begin their LCAP update review and analysis, they will not have the year-end actuals. Recommend the following change to the subheading to avoid confusion: " <u>Projected Year-End</u> Action/Services and Related <u>Budgeted</u> Expenditures".	Partially Accept: The proposed LCAP template, Section 2, annual update table and instructions were revised to provide for reporting of " <u>Estimated Actual Annual Expenditures.</u> "
62	California School Board Association	15497.5 [Local Control and Accountability Plan and Annual Update Template]: Add the word budgeted to the chart subheading: "Actions/services and Related <u>Budgeted</u> Expenditures"	Partially accept: See response to comment #64.
63	Wendy Benkert Ed.D. Associate Superintendent of Business Services, Orange County Department of Education.	15497.5 [Local Control and Accountability Plan and Annual Update Template]: Modify the annual update section to focus exclusively on actions and outcomes. LEAs will not have "actual expenditures" at this time, the table represents a shift from outcomes to expenditures, and many metrics will not be available until after this table is completed.	Partially Accept: See response to comment #61. .
64	California School Finance Reform Coalition	15497.5 [Local Control and Accountability Plan and Annual Update Template]: If the recommendation to return to the LCAP template adopted through emergency regulations is not adopted, then recommend the following changes to the annual update section:	Partially accept: See response to comment #61.

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		<p>Amend language in LCAP instructions to note that the report of annual expenditures must be based on the estimates prepared at the time the proportionality calculation is completed as required by section 15496(a)(2).</p> <p>The subheading for the right-hand column of the LCAP annual update template be changed to read: "Projected Year-End Action/Services and Related Estimated Expenditures," and that the column heading that now reads, "Actual Expenditures" be changed to read, "Estimated Year-end Expenditures."</p>	
65	Colin Miller California Charter Schools Association	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The subheading on the right side of the annual update table asks for "Actual Action/Services and Related Expenditures." At the time of year in which LEAs will begin their LCAP update review and analysis, they will not have the year-end actuals. Amend subheadings as follows:</p> <p>Change "actual expenditures" to estimated actual expenditures".</p>	<p>Partially Accept:</p> <p>See response to comment #61.</p>
66	Kimberly Rodriguez, Association of California School Administrators Coalition of Statewide Organizations and LEAs	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Make the following changes to the guiding questions:</p> <p>"5) What changes in actions, services, and expenditures will be made as a result of reviewing past progress and/or changes to goals? What changes/progress have been realized and how do these compare to changes/progress predicted? What</p>	<p>Partially accept: The LCAP template, Section 2, guiding questions are revised as follows: Question #5 is revised, and question #6 is added as set forth above in response to comment #56.</p>

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		<p>modifications are being made to the LCAP as a result of this comparison? “</p> <p>See attached suggested annual update table from the Association of California School Administrators and Coalition of Statewide organizations and LEAs. The proposed table includes:</p> <p>Changing the headings for the annual update table to read “<i>Budgeted Expenditures for Action/Services.</i>”</p> <p>Add the term “measurable” to headings for outcomes.</p> <p>Remove the separate boxes that details actions and expenditures for unduplicated pupils and instead allow an LEA to check a box indicating which pupil group an action or expenditure applies to.</p>	<p>Partially accept: See changes to the term “actual” in response to comment #61</p> <p>Accept: Amend headings to read “<u>Expected Annual Measurable Outcomes</u>”, and “<u>Actual Annual Measurable Outcomes</u>”</p> <p>Partially Accept: The instructions, tables, and guiding questions in the LCAP template, Section 2, are revised to provide greater clarity and transparency as described in response to comments #49 and #53.</p>
67	Cindy Marten, Superintendent, San Diego Unified California School Boards Association	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template] no specific language requested:</p> <p>Provide more clarity on the following part of guiding question 5, since it is redundant to the annual update table or remove if unnecessary:</p> <p>“5) What changes in actions, services, and expenditures will be made as a result of reviewing past progress and/or changes to goals? <i>What changes/progress have been realized and how do these compare to changes/progress predicted?</i> What</p>	<p>Partially accept: See response to comment #56.</p>

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		modifications are being made to the LCAP as a result of this comparison? “	
68	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	15497.5 [Local Control and Accountability Plan and Annual Update Template] no specific language requested: Annual Update Guiding Question 5: This question needs to be clear that districts are to describe the changes in actions, services, and expenditures at the district and school site level, with attention given to unduplicated pupils that will be made in the LCAP and budget. The phrase “district and school site level and unduplicated pupils” needs to be inserted in order to prompt the reporting of this specified information.	Partially Accept: See response to comment #56.
69	Joshua Schultz, Deputy Superintendent, Napa County Office of Education Peter Birdsall, California County Superintendents Educational Services Association Cindy Marten, Superintendent, San Diego Unified	15497.5 [Local Control and Accountability Plan and Annual Update Template]: Remove “Actual Expenditures” column from the annual update table to shift the focus to outcomes achieved for students and avoid the creation of a financial tracking system similar to categoricals.	Reject: The “Actual Expenditures” column was added to the template to ensure that LEAs are transparent about whether they provided the planned service and expended the funds identified. See also changes made to the term “actual” in response to comment #61.
70	California School Boards Association	15497.5 [Local Control and Accountability Plan and Annual Update Template]: Recommend putting the annual update table before the goals table to align the order in the template with the order in practice.	Reject: The primary focus of the LCAP is goal development and planning; thus the goal table is first.

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71	Brian Lee, State Director Fight Crime, Invest in Kids California	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The LCAP template should explicitly require an explanation of how all LCFF funds, not just Supplemental and Concentration funds, are used, and should also reflect how other district expenditures are used.</p>	Reject: See response to comment #46.
72	Cheryl Ingham, Humboldt County LCAP Lead	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Amend instructions to require statement of dollar amount of Supplemental/Concentration funds only. Delete description of expenditures. Information is available in Action/Budget section (Section 2) and is repetitive in this part.</p>	Reject: This suggested amendment would reduce transparency on the use of supplemental and concentration funds.
73	Brian Lee, State Director Fight Crime, Invest in Kids California	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>The LCAP template should require reporting of how the level of Supplemental and Concentration funding is calculated to ensure that calculation is correct and transparent.</p> <p>The LCAP template should require districts to account for all Supplemental and Concentration funds by reporting which expenditures will be funded using Supplemental and Concentration funds, and which expenditures are districtwide or schoolwide.</p>	<p>Reject: The COE review process must ensure that the LEA has completed the LCAP according to the template and will assess whether this amount is accurately reported. Including the calculation which is based on LEA input would not ensure accuracy or transparency for stakeholders.</p> <p>The instructions for the LCAP template, Section 3A, include directions for the LEA to list and describe the use of supplemental and concentration grant funding and include the required justification for using funds for districtwide or schoolwide services.</p>

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74	Vincent Matthews San Jose Superintendent of Schools	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Require a standard table in the LCAP that provides information on calculating the base, supplemental, and concentration grant amounts.</p>	Reject: See response to comment #73.
75	Jackie Thu-Huong Wong, Director Foster Ed, National Center for Youth Law Annie Fox, PICO California	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Require the LEA to include each step of the calculation required by 5 CCR § 15496(a), including specifically identifying all expenditures that are included in the estimate specified in § 15496(a)(2), which of those expenditures will be continued into the current year, and at what level.</p> <p>No specific language requested:</p> <p>Modify the format of Section 3a to make it easier for LEAs to follow the instructions to further promote accessibility of information for stakeholders and transparency around use of supplemental and concentration funding.</p>	<p>Reject: See response to comment #73.</p> <p>Partially Accept: Instructions for Sections 3A and 3B were reorganized to clarify each of the required elements for each section. A separate box in table 3A was added for an LEA to enter the total supplemental and concentration grant funds calculated. A separate box in table 3B was added for an LEA to enter the minimum proportionality percentage.</p>
76	Debra Brown, Associate Director, Children Now Civil Rights Coalition Cynthia Rice, CRLA Shelly Spiegel Coleman,	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Further modify Section 3.A of the LCAP template to assist LEAs and promote accessibility and transparency by providing discrete</p>	Partially Accept: See response to #75

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	<p>Californians Together Jan Gustafson Corea, California Association for Bilingual Education</p>	<p>prompts in which LEAs would report all of the information required in the instructions: (a) the total supplemental and concentration amount; (b) a description of how supplemental and concentration funding will used, (c) space to specifically identify each use of funds for districtwide and schoolwide purposes with space for the appropriate justification (with each required component of the justification).</p> <p>See attached suggested sections 3a and 3b from Children Now and the Civil Rights Coalition:</p> <p>Proposed 3a sections includes:</p> <p>A calculation table for the supplemental and concentration grants and minimum proportionality percentage that includes boxes to be completed for each of the steps in Section 15496(a).</p> <p>An additional table that requires the top 10 actions/expenditures for the prior year.</p> <p>Amending Section 3A instructions as follows:</p> <p>A. Identify the amount of funds in the LCAP year calculated on the basis of the number and concentration of low income, foster youth, and English learner pupils, <u>and the year-to-year increase in these funds,</u> as determined pursuant to 5 CCR 15496(a)(5). <u>Complete Attachment 1 to reflect the basis for this calculation.</u> Describe how the LEA is expending these funds in the LCAP year, focusing on new or expanded uses of these funds. Include a description of, and justification for, the <u>For any</u></p>	<p>Partially Accept: See comment 75</p>

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		<p>use of any <u>these</u> funds in a districtwide, schoolwide, countywide, or charterwide manner, <u>include a description of each such use, and justification for how such use is principally directed towards and effective in meeting the LEA's goals for unduplicated pupils</u>, as specified in 5 CCR 15496. <u>Add additional rows to the table as necessary.</u> For school districts with below 55 percent of enrollment of unduplicated pupils in the district or below 40 percent of enrollment of unduplicated pupils at a school site in the LCAP year, when using supplemental and concentration funds in a districtwide or schoolwide manner, the school district must additionally describe how the services provided are the most effective use of funds to meet the district's goals for unduplicated pupils in the state priority areas. (See 5 CCR 15496(b) for guidance.)</p> <p>Including tables with specific boxes that require separate detail of new services as compared to the prior year, and justification of schoolwide/districtwide expenditures.</p> <p>Amend Section 3B instructions to require the completion of the calculation table.</p>	
77	Debra Brown, Associate Director, Children Now Civil Rights Coalition Valerie Cuevas Interim Executive Director The Education Trust–West	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]:</p> <p>Specifically, the LCAP template should be further modified to ensure that LEAs: (1) set forth their 7-step calculation of the LEA's supplemental and concentration funding and proportionality</p>	Reject: See response to #73.

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	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	percentage pursuant to 5 CCR § 15496(a) in an appendix (delineating in Step 2 the basis for its prior year unduplicated expenditures, including a listing of included programs and their dollar amounts); and (2) identify which continued prior year actions or services and which newly added actions or services are specifically funded by supplemental and concentration funds, and at what level (with actual dollar amounts). See attached proposed appendix from Children Now and the Civil Rights coalition. The appendix includes boxes for each of the steps of the calculation required in regulations.	
78	Cheryl Ingham, Humboldt County LCAP Lead	15497.5 [Local Control and Accountability Plan and Annual Update Template]: Change prompt. Ask for minimum proportionality percentage (MPP) only for numerical “increases.” For “improvements,” request LEA provide a description of programs and services it will be strategically implementing to improve outcomes for each identified group; SED, EL, FY, RFEP. This section could be the go-to section to review district plans for “unduplicated count students” by also adding, reasons for choosing the approaches LEA selects and information on how impact will be tracked. This would keep the focus on evidence LEA is providing support to students who generated Supplemental/Concentration funds, not a contrived percent.	Reject: LCFF statute specifically requires that an LEA: “increase or improve services in proportion to the increase in funds”. The minimum proportionality percentage must be applied to both quantitative and qualitative descriptions of the provision of services.
79	Cheryl Ingham, Humboldt County LCAP Lead	15497.5 [Local Control and Accountability Plan and Annual Update Template]/ No specific language requested: Need examples from CDE/SBE on what is an acceptable qualitative description of meeting the proportionality description.	Reject: Providing these examples is outside of the scope of regulations.

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80	Debra Brown, Associate Director, Children Now	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]/ No specific language requested:</p> <p>Amend the definition to ensure clarity as follows:</p> <p>(a) “Chronic absenteeism rate” shall be calculated as follows:</p> <p>(1) The number of pupils with a primary, secondary, or short-term enrollment during the academic year (July 1 – June 30) who are chronically absent where “chronic absentee” means a pupil who is absent 10 percent or more of the schooldays in the school year when the total number of days a pupil is absent is divided by the total number of days the pupil is enrolled and school was actually taught in the total number of days the pupil is enrolled and school was actually taught in the regular day schools of the district, exclusive of Saturdays and Sundays.</p> <p>(2) The unduplicated count of all pupils (in the group or subgroup being measured) with a primary, secondary, or short-term enrollment “in the group or subgroup being measured” during the academic year (July 1 – June 30).</p> <p>(3) Divide (1) by (2).</p>	<p>Reject: Proposed change in language is unnecessary. The current definition does not prohibit an LEA from calculating a chronic absenteeism rate for any subgroup.</p>
81	Eric Premack, Charter Schools Development Center	<p>15497.5 [Local Control and Accountability Plan and Annual Update Template]/ No specific language requested:</p> <p>The new definitions for chronic absenteeism and especially dropout rates are unnecessarily restrictive and may yield misleading results. The definition of absenteeism calls for basing the calculation on the number of days school is taught in the district, which could be problematic for county and/or charter schools. It also calls for excluding Saturdays and Sundays which may also be misleading for schools that teach on these days. The</p>	<p>Reject: LEAs may include additional locally-identified metrics to further explain and detail their LCAP narrative. An LEA may include narrative that provides a basis for the results of the metrics, and this may be especially helpful for those LEAs with unique programs or student populations.</p>

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		high school dropout rate methodology is unnecessarily narrow by excluding students who pursue nontraditional options (e.g., GED and is successor), who require more than four years to graduate due to child-rearing or other responsibilities, etc.	
82	Maria Raouf Annie Fox, PICO California	New Regulation/ No specific language requested: Ensure meaningful engagement of the SSCs and ELACS in the development and alignment of LCAPS and site level plans and budgets.	Reject: Statute does not specify that ELACs are the designated English learner parent advisory committee, although they may be used as such. The LCAP instructions already require that “To facilitate alignment between the LCAP and school plans, the LCAP shall identify and incorporate school-specific goals related to the state and local priorities from the school plans submitted pursuant to Education Code section 64001. Furthermore, the LCAP should be shared with, and input requested from, school site-level advisory groups, as applicable (e.g., school site councils, English Learner Advisory Councils, pupil advisory groups, etc.) to facilitate alignment between school-site and district-level goals and actions.”
83	Ron Rapp, California Federation of Teachers	New Regulation/ No specific language requested: School personnel and local bargaining units must be involved throughout the planning, development and annual review of these plans.	Reject: This commenter does not provide specific language recommendations. However, the instructions for completing an LCAP in statute and reflected in the proposed LCAP template require consultation of school personnel and local bargaining units.
84	John Lorona	New Regulation/ No specific language requested: Continue to improve the LCFF regulations in order to ensure that	This commenter makes no specific language recommendations. However, in response to

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		all stakeholders and the public can understand how all supplemental and concentration funds are being used, and provide greater transparency around how districts are calculating funds intended to improve or increase services for high-need students.	the general comment, the proposed LCAP template is revised to provide greater transparency.
85	Vincent Matthews San Jose Superintendent of Schools	New Regulation/ No specific language requested: Provide translated versions of the LCAP template in the top 10 most prevalent languages in California.	Reject: Translation of the regulations is not in the scope of regulations. The 2014-15 LCAP template is provided translated into Spanish on the WestEd website
86	Vincent Matthews San Jose Superintendent of Schools	New Regulation/ No specific language requested: Include a summary at the beginning of the LCAP to share LEA information, data, and context for the LCAP.	Reject: LEAs have the option to provide summaries of their adopted LCAP as they determine are appropriate to their local circumstances and needs.
87	Vincent Matthews San Jose Superintendent of Schools	New Regulation/ No specific language requested: Use an excel document template for LCAP tables to allow for ease of inputting information.	Reject: CDE continues to work on the development of an electronic template that will provide additional flexibility in format of the LCAP and greater ease of use.
88	Vincent Matthews San Jose Superintendent of Schools	New Regulation No specific language requested: Provide examples of well-constructed LCAPs and sections of LCAPs.	Reject: The proposed LCAP template was revised as set forth in response to comments #49 and #53. Providing these examples is outside the scope of regulations.
89	Cindy Marten, Superintendent, San Diego Unified	New Regulation No specific language requested: See attached user friendly LCAP from San Diego Unified to inform amendments to the LCAP.	Reject: Proposed LCAP template is revised as described in response to comments #49 and #53.
90	Kent Kern, Superintendent San Juan Unified	New Regulation/ No specific language requested:	

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		General support for the new template format. General concern over addition of any language that reduces local control or restricts use of funds. Emphasis in LCAP template should be changed to be more on achievement of student outcomes and less on dollars spent.	General letter of support. See response to comments #49 and #53.
91	Cindy Marten, Superintendent, San Diego Unified	New Regulation/ No specific language requested: Accelerate the development of the evaluation rubric to during the 2014-15 year.	Reject: Beyond the scope of this rulemaking.
92	Cynthia Rice, CRLA Shelly Spiegel Coleman, Californians Together Jan Gustafson Corea, California Association for Bilingual Education	New Regulation/ No specific language requested: In the “guidance” that will be sent to school districts and COEs on the regulations by CDE/SBE, a statement should be included that school districts and COEs are encouraged to maintain their school site EL parent advisory committees.	Reject: Beyond the scope of statute
93	Senator Wyland	New Regulation/ No specific language requested: In the absence of reliable Smarter Balance test results, standardized testing should be defined more specifically to include other well-known diagnostic standardized tests.	No specific language requested. LEAs may determine usage of standardized tests, including diagnostic assessments, as appropriate to locally determined pupil needs and outcomes.

LATE COMMENTS RECEIVED

94	Taryn Ishida, <ul style="list-style-type: none"> • Letters from Student Voice Coalition • Student Voice Support • Steven Bradford, Assemblymember • Holly Mitchell, Senator 	Additional steps need to be taken to ensure districts seek meaningful student input.	No response required. Received after the closed comment period.
95	Molly Dunn, Alliance for	Ensure Foster Youth representation on Parent Advisory	No response required. Received after the

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	Children's Rights	Committee.	closed comment period.
96	Bruce Braciszewski, Classroom of the Future Foundation	Please give very serious consideration to including Science content as a focus within LCAP.	No response required. Received after the closed comment period.
97	Jackie Wong, National Center for Youth Law	Retain "Principally"; Ensure Foster Youth representation on Parent Advisory Committee.; Ensure Transparency for Calculation of Prior Year Expenditures and Current Year Supplemental/Concentration Funding.	No response required. Received after the closed comment period.
98	Carol Fry Bohlin	Include Science content as a focus within LCAP.	No response required. Received after the closed comment period.