



School District Plans in the Time of COVID-19

Lessons Learned from the Learning Continuity Plans

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School District Planning Requirements During COVID-19: Key Events

- In June 2020, the California legislature passed **Senate Bill 98**, establishing minimum expectations for teaching and learning during COVID-19. SB 98 also suspended the usual **Local Accountability and Attendance Plan (LCAP)** for 2020-21 and required a new **Learning Continuity and Attendance Plan (LCP)** instead.
- The California Department of Education (CDE) made changes to align existing LCAP templates with pandemic-related funding sources and timelines. In September 2020, it updated the Budget Overview for Parents template to require districts to report federal CARES Act (The Coronavirus Aid, Relief, and Economic Security Act) revenues and planned expenditures. In January 2021, it adopted changes to the LCAP Annual Update template so that the 2021-22 LCAP will include updates and analysis from both the 2019-20 LCAP and the 2020-21 LCP.
- In March 2021, the legislature passed **Assembly Bill 86**, which among other things, directs the CDE to create a plan template that districts will use to describe how they intend to spend billions of dollars in new “expanded learning opportunities” grants. Districts must adopt these plans by June 1, 2021.
- By July 2021, districts will have to adopt a new three-year (2021-24) LCAP using a revised template.

Key Question Addressed by this Brief

What lessons can be learned from school district planning requirements introduced during COVID-19, and how can these lessons influence how we think about the usual Local Control and Accountability Plan (LCAP) and other planning tools going forward?

Our Analysis of Learning Continuity Plans

To better understand how California school districts were planning during the 2020-21 school year, we examined LCPs from a non-random sample of 20 school districts, deliberately choosing districts that skewed larger and higher poverty than the state as a whole. These plans were meant to describe how districts were ensuring continuity of learning during COVID-19, including their plans for in-person instruction and distance learning and the additional support they would provide to students who are English learners, are from low-income families, have exceptional needs, experience homelessness, or are in foster care.

We holistically reviewed these plans and also analyzed them using a standardized protocol. We also interviewed leaders in three districts about their LCPs and their pandemic response plans more generally using a semi-structured interview protocol. Finally, we spoke with other advocates and researchers who are closely studying LCPs to triangulate our findings and conclusions.

Our findings are presented in two briefs. This one describes what we learned, observed, and concluded about the planning process. The other describes what we learned about family engagement.

What Worked Well with the LCP, and How Does it Compare to the LCAP?

The state has made numerous changes to school district planning and reporting requirements since the pandemic began. Ideally, these requirements should strengthen local planning and ensure public transparency and accountability. Here, we make a few observations about what worked well – and what didn’t – with the LCP on its own and as compared to the LCAP.

What Worked Well

The LCP template was, appropriately, more narrowly focused than the LCAP. The LCP template kept districts focused on the highest priorities during this public health emergency, particularly student learning and student social and emotional well-being. As one district leader explained, the LCP template helped them “compartmentalize and communicate offerings.” The shorter template also gave districts some freedom from compliance, allowing them to focus more attention on the actual delivery of services. The LCAP, by contrast, is intended to be a comprehensive plan that prompts districts to cover a wider range of priorities and is usually much longer (sometimes hundreds of pages).

As compared with LCAPs, the LCPs often contained more specific detail about services for homeless youth, foster youth, and special education populations. The LCP template required districts to describe the additional supports they would provide during distance learning to assist students with unique needs, including English learners, students with exceptional needs, students in foster care, and students who are experiencing homelessness. Districts were also asked to describe how their



strategies to address “learning loss” would be different for these student groups. In response, districts often provided specific detail on the services for those student groups. For instance, 16 of the 20 LCPs we reviewed discussed how staff are reaching out to and supporting homeless youth. None of the LCPs we reviewed described services for the broad category of “unduplicated students” and instead described supports distinct to English learners, low-income students, and foster youth.

The LCAP template, on the other hand, prompts districts to describe services for the group called “unduplicated” students. While most LCAPs do include descriptions of services specifically serving English learners and low-income students, they include inconsistent detail on services specifically for foster youth and homeless youth and often do not discuss services for students in special education.

As compared with the LCAPs, the LCPs included a stronger focus on tiered systems of support. The LCP template prompted districts to address tiered re-engagement strategies, and it also required districts to describe the additional supports provided to students with unique needs. Together, these prompts led districts to describe Multi-Tiered Systems of Support. Although the detail and quality of these descriptions varied by district, most LCPs included more comprehensive and cohesive descriptions of tiered systems of support than usually found in LCAPs.

What Worked Less Well

The LCPs included limited detail about expenditures. Advocates who separately examined 48 LCPs found that most districts accounted for less than half of their revenues in their LCPs.¹ However, this is a problem that extends to the LCAP as well. Some of these same advocates have previously found that districts' LCAPs often fail to account for significant portions of their budgets,² and the State Auditor has pointed out that it is difficult to track LCFF spending.³ This challenge in tracking spending has extended to CARES Act funding as well. While the newly revised LCAP **template and expenditures** tables may help address this, stronger oversight and reporting requirements will still be needed to make sure districts are clearly describing how they are spending state and federal dollars.

Districts approached the LCP, as they often do with the LCAP, as a compliance exercise rather than as a tool for strategic planning. This was, in part, due to the timing of the LCP. The LCP template was adopted after most districts had started the school year and therefore came too late to serve as a planning tool. Instead, it was a place where districts documented decisions that, in most cases, had already been made. District leaders told us they cut and pasted into the LCP from other plans. On a positive note, though, many did conduct additional engagement activities to get input from various stakeholders.

A compliance-oriented plan is not all bad: it offers parents, school board members, and other

community stakeholders a tool for monitoring implementation and holding districts accountable. However, there may be ways to achieve the same goals of transparency and accountability while also supporting more meaningful strategic planning. For instance, the state could still require that districts create local plans and could require some key elements that must be in those plans. However, it could make the boilerplate template optional. Districts could either use the template or come up with their own document that adheres to statutory requirements but within a format and approach that works best for their context and community.

The LCP, like the LCAP, is a static rather than a living document. While this is a limitation of many plans, it is particularly problematic when public health conditions, state guidance, and education offerings are constantly changing. It would have been helpful if the state had paired the plan with real-time data collection and reporting. The public has needed to monitor whether or not schools are open for in-person learning, which schools and students have particularly acute connectivity needs, and which schools and students are struggling with attendance and engagement. The state is now beginning to track information on school opening status.⁴ The state should continue to do this but should extend it to include information on the number and demographics of students in each modality. The state should also require the collection and reporting of additional “opportunity-to-learn” data, including data on access to devices and connectivity and on student attendance or engagement.

¹ Letter dated March 1, 2021 from advocates, including National Center for Youth Law, to Gov. Gavin Newsom, et. al. re: Ensuring that California Utilizes Federal Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA) Education Funds with a Focus on Equity, Transparency, and Accountability.

² Jongco, Angelica (2016). *Keeping the Promise of LCFF: Key Findings & Recommendations After Two Years of LCFF Implementation*. Public Advocates. <https://www.publicadvocates.org/resources/library/public-advocates-keeping-promise-leff-report/>

³ California State Auditor (2019). *K-12 Local Control Funding: The State's Approach Has Not Ensured That Significant Funding Is Benefiting Students as Intended to Close Achievement Gaps*. <https://www.auditor.ca.gov/pdfs/reports/2019-101.pdf>

⁴ State of California, Safe Schools for All Hub, <https://schools.covid19.ca.gov/>



Recommendations

As the state considers additional or revised planning requirements during and after this pandemic, we offer the following recommendations:

Continue

- Encouraging districts to describe tiered systems of support and strategies to support students' mental health and social and emotional wellness.
- Asking districts to address services for homeless youth, special education students, and other disengaged and high-need students (in addition to the low-income, English learner, and foster youth groups already named under LCFF).
- Collecting and reporting data on which school districts are offering in-person, hybrid, and virtual learning, extending this to include information on the number and demographics of students in each modality.
- Improving ways to assess and report the effectiveness of each action and districts' progress toward goals.
- Supporting districts in strategies for co-developing goals and spending plans in collaboration with community stakeholders.

Stop

- Developing a new planning template for everything. Instead, focus on what the state needs districts to address and account for (particularly regarding goals, actions, and expenditures for vulnerable students), and allow for local flexibility with the plan format—so long as this flexibility is paired with strong county oversight.
- Prompting districts to describe services and supports for overly broad categories like “unduplicated students” that miss different student groups' unique needs.

Start

- Requiring districts to explain and track budgeted and actual expenditures of all major funding sources, including federal and state stimulus dollars, in a single place for the district overall and for each school site.
- Requiring school districts to track and report additional “opportunity-to-learn” data, including data on access to devices and connectivity and on student attendance or engagement, on a regular (perhaps monthly or quarterly) basis.
- Reducing redundancy and unnecessary length in the LCAP by streamlining the template and creating a truly electronic version that will make the plan easier to populate, maintain, and navigate.