Advancing LCFF Equity and Accountability

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University of Colorado Boulder

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National Education Policy Center

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NEPC Staff

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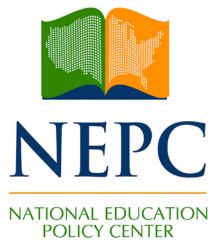
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Executive Summary

When California lawmakers enacted the state's Local Control Funding Formula (LCFF) in 2013, they took ambitious steps towards advancing educational equity. After more than a decade of implementation, it is time for the legislature to fine tune this policy, building on the state's progress. Advancing the equity commitments of LCFF has become even more important given the recent erosion of federal support for public education.

Grounded in recommendations from a group of knowledgeable and civically engaged Californians—education leaders, advocates, and community leaders—this report describes the changes that are necessary to strengthen the state's approach to equity and accountability in public education. Through their recommendations, these participants called attention to the continued need to address the educational impacts of persistent opportunity gaps both inside and outside schools.

A Decade of Progress and a Call for Renewal

LCFF has helped California make measurable progress in connecting school funding to student needs. The policy expanded local autonomy by consolidating dozens of categorical grants into a single funding mechanism (LCFF) and adding community-based accountability through Local Control Accountability Plans (LCAPs). Research confirms these changes boosted achievement, graduation rates, and equitable funding distribution. Yet stakeholders consulted in this study argued that the state has more work to do, in order to ensure that high-needs students directly benefit and that the social and economic inequities that impede learning are addressed. The consensus that emerged from these experts is not to replace LCFF/LCAP but to enrich it.

Shared Public Priorities

The community voices represented in this report affirmed broad concerns that echo across California's civic landscape: Education funding remains inadequate, inequities in public resources persist, and systems of accountability must become more participatory and transparent. The report's four overarching recommendations reflect these shared priorities:

1. Increase education funding and improve transparency.

2. Strengthen LCFF's equity framework through refined funding measures.

3. Build reciprocal and participatory accountability structures.

4. Align education policy with broader social systems that affect children's lives, such as housing, healthcare, nutrition, child welfare, and behavioral health and developmental services.

For each priority, our report's participants addressed long-standing challenges with actionable policy ideas that draw from their expertise and lived understanding of California communities.

Recommendation 1: Increase Education Funding

This report's participants were emphatic that California's existing funding is insufficient to meet its equity and quality goals. They called for higher base grants and stronger supplemental and concentration grants for high-needs students, along with reforming property tax policies. Participants pointed in particular to Proposition 13, which constrains local revenue generation and thereby places a great strain on the state budget, and to the upcoming expiration of the tax rate increases created by Propositions 30 and 55. They also noted the need to explore more progressive revenue options such as taxing stock trades.

The participants also called for increasing financial transparency with clearer public communication about how funds are spent, how students' needs shape allocations, and how investments impact outcomes. They tied this recommendation to a culture shift in public discourse, urging educators and policymakers to emphasize success stories, not only deficits, to strengthen trust in public education and galvanize civic support for further investment.

Recommendation 2: Center Equity Through Better Measures and Distribution

Participants proposed replacing outdated poverty metrics with more nuanced indicators that reflect California's complexity, such as direct certification from state

or federal aid programs, regional cost-of-living adjustments, and composite indices such as the Los Angeles Unified School District's Student Equity Need Index, which more accurately reflect the needs of students and their communities.

They also urged counting students with multiple intersecting needs more than once, so that, e.g., a foster youth who is both a low-income student and an English language learner (ELL) generates funding commensurate with that student's compounded challenges. Additionally, participants advocated for expanding LCFF's categories to include unhoused students and Native American tribal members, while cautioning that equity adjustments must not dilute resources for the schools serving students with the greatest needs.

Recommendation 3: Advance Participatory and Reciprocal Accountability

Our participants called for a deepened democracy within the education system. The LCAP process, although innovative, has often become a hollow bureaucratic exercise instead of a genuine platform for shared problem-solving. Participants envisioned a system where parents, students, and community partners can easily see LEA goals, track progress through accessible dashboards, and witness their feedback reflected in decisions. This higher standard would mean that LCAP teams must be required to include this broader group of participants in setting and measuring the impact of LCFF investments.

Structural improvements that our participants felt were needed include improved LCAP templates and measures for LEAs to use, improved tracking of school-level spending, and comprehensive training for LEA and community leaders trying to engage community members. They suggest that expanding the state's Community Engagement Initiative could help more LEAs build broader, sustained participation in the LCAP process. Above all, participants emphasized that genuine accountability must flow both ways—up to the state's leadership as well as down to LEAs and schools. They proposed legislatively defining both participatory and reciprocal accountability and even "trigger laws" to enforce state accountability if fiscal obligations are unmet.

Recommendation 4: Align Education with Broader Systems of Care

The final recommendation echoes a view now widely shared across California that education cannot be siloed from the social conditions of students' lives. The report urges state leaders to incentivize education systems to collaborate with partners from other public sectors like housing, public health, behavioral health, nutrition, transportation, child welfare, and developmental services with the aim of creating a sin-

gular system of care that serves young people. By combining efforts and coordinating across systems, California can better close opportunity gaps that originate beyond the classroom. Our participants pointed to programs like the Community Schools Partnership Program, the Children and Youth Behavioral Initiative, BH-CONNECT, Comprehensive Prevention Planning under FFPSA Part 1, and Medi-Cal reimbursements for health supports as examples of existing state programs to build on.

Participants also urged the state to take a leadership role in integrating data, aligning local and federal funding streams, and creating county-level liaisons to coordinate cross-sector collaboration. This systemic approach, they noted, would not only stabilize funding but serve the whole child more effectively.

The Broader Message: Listening to Informed Californians

This report arose from a commitment to deeply engage with Californians who know the system best, including community organizers, longtime advocates, educational leaders, and researchers. Their insights reaffirm much of what California's education and equity movements have long maintained—that addressing inequality requires sustained public investment, policy coordination across government levels, and genuine democratic participation in decision-making.

These participants have articulated a forward-looking vision rooted in their experiences. They insist that the state must recommit to equity as a moral and practical imperative, ensuring that fiscal policy, community engagement, and accountability are aligned around shared responsibility for student success.

This report and others mark a new chapter in LCFF and LCAP, transitioning from first-generation reform to a dynamic, participatory, and transparent system capable of meeting 21st-century realities. The knowledgeable and engaged Californians who speak through this report call on the state to act now—to reinforce the LCFF system of equitable funding, to revitalize community voice, and to knit education policy into a broader social fabric that sustains opportunity. Their message is clear: The groundwork for fairness has been laid, and the next decade must transform progress achieved thus far into lasting, inclusive advancement for all California students.
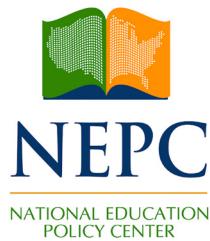
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California enacted the Local Control Funding Formula in 2013 to improve the equity of funding for public education and provide reliable and sufficient long-term funding. LCFF was intended to give local education agencies (LEAs) an opportunity to create correspondingly long-term transformative plans for improvement. Accordingly, LCFF was a critical first step in creating the resourcing and accountability structures needed to transform public education in the state. As discussed throughout this report, LCFF was seen by our participants as providing a solid foundation from which California can work to advance its public education system to meet the dynamic future—efforts made more essential by the reduced federal investment in public education. Meeting this moment requires advancing a vision of building and sustaining a robust funding system that provides high-quality public education for all students.

LCFF consolidated dozens of categorical grants allocated to LEAs into one funding program that allocates funds based on student needs and other indicators. Currently, about 80 percent of TK-12 funding is allocated through the LCFF. The three primary sources of funding for LCFF are the state's general fund (via the Proposition 98 guarantee), proceeds from Proposition 55 (and before that, Proposition 30) and local property taxes.[1] These funds are allocated through three LCFF grants. Eighty percent of all LCFF funding is allocated through the base grant, which provides a set amount of per-pupil funding to LEAs based on grades served and the overall total average daily attendance. The second grant, called the supplemental grant, provides differentiated support (an additional 20% of the per-pupil base grant) to LEAs enrolling students who come from low-income families or who are ELLs or foster youth. Notably, the supplemental grant is provided based on unduplicated student counts; each student is counted only once regardless of how many of these three criteria the

student meets. The third grant, called a concentration grant, provides an additional 65% of the per-pupil base grant to LEAs with 55% of their enrolled students having these same designations, and again only applies to unduplicated student counts.[2]

Beyond the formula and funding, LCFF introduced a new layer of accountability by requiring school LEAs to create Local Control Accountability Plans (LCAPs) that incorporate direct community input. LCAPs require LEAs to establish goals for improving student outcomes and learning opportunities and then align activities and funding to those goals. The LCFF and LCAPs have been the primary policies guiding funding in California for the last dozen years. As we discuss in the next section, several recent reports have offered suggestions on how best to improve that system, particularly LCFF.

This research project begins with the well-grounded premise that the LCFF/LCAP approach has been beneficial to California's students[3] and should be improved rather than replaced. Our project explores potential approaches for such improvement based on discussions with well-informed Californians and national accountability experts. We focus on the question,

> *What elements and structure would need to be included in revised LCFF/ LCAP legislation to create a multi-level and multi-sector reciprocal accountability system that effectively closes the opportunity gaps that exist inside and outside of schools?*

Multi-level refers to the levels of authority or accountability within the public education system, such as state, county, LEAs, school, classroom, teacher, and student.

Multi-sector refers to the many roles that the government can play in closing opportunity gaps (e.g., education, housing, transportation, food/nutrition, safety, healthcare, and employment).

Reciprocal accountability is grounded in the idea that multiple levels of authority or accountability are interdependent. District-, state-, and federal-level governments that shape the educational and funding systems should be accountable for providing the resources, supports, and incentives students need to learn while also holding all parts of education systems accountable for leveraging the resources, supports, and incentives to create equitable high-quality learning opportunities.

Opportunity gaps refer to the unequal access to opportunities to learn and thrive inside and outside of school.

We answered our research question by speaking with education policy experts and advocates who are engaged in these conversations. We spoke with a total of 21 people across nine interviews and two focus groups. During our in-depth conversations, we asked participants to review a profile of a possible accountability system, a profile

that we had created based on three sources: our review of earlier testimony and publications, a 2023 report from NEPC and a partner (discussed below), and pre-liminary interviews with California experts. The profile, which was about five pages long, was designed to ground our conversations and make them as productive and substantive as possible. We asked participants to think of the profile as a flexible, non-binding starting point for them to build and describe their ideal accountability system. After each of our initial conversations, we continued to develop the profile, adding and subtracting ideas in accordance with new knowledge and insights.

The results of this work are four overarching recommendations with several specific ideas under each:

Recommendation 1: Increase Education Funding

- Legislation should increase the LCFF base grants and increase the size and weights of the supplemental and concentration grants that LEAs receive for existing and new groups of students (as set forth in Recommendation 2).

- Legislation should address property-tax disparities associated with Proposition 13.

- Increased funding should be accompanied by increased transparency. LEAs, in particular, should clarify how and where education funds are used.

Recommendation 2: Center Equity Through Better Measures and Distribution

- LCFF should use more accurate and nuanced indicators of poverty.

- LCFF should account for gradients of poverty experienced by students and served by schools.

- LCFF should ensure that supplemental and concentration funding that LEAs receive for high-needs students is used for those same students at the school level.

- LCFF should change its current approach of using unduplicated counts, accounting instead for multiple categories of needs for a given student.

- LCFF should include additional categories of students with higher needs, including unhoused students, Native American tribal members, and students with greater needs as measured by a new statewide version of Los Angeles Unified School District's (LAUSD) School Equity Need Index (SENI).

- The state should consider whether a funding formula based on enrollment or attendance better addresses fairness and equity.

- The state should consider addressing the staffing needs of schools and LEAs that have higher concentrations of poverty.

Recommendation 3: Advance Participatory and Reciprocal Accountability

- LEAs should set clear educational and spending goals in LCAPs, use understandable indicators to track progress toward those goals, and report results in an accessible dashboard so that non-expert community members can easily understand how their school, LEA, and state are doing.

- The state should provide better technology for LEA leaders to create and monitor LCAPs.

- Creating and monitoring LCAPs should be an engaged and ongoing learning process, helping LEAs and communities collaborate, understand, and improve.

- The state should incentivize LEAs to hold regular community meetings, where LEAs share the results of their LCAPs and get feedback from the community. This expanded participatory accountability should reach and involve a broader part of the community by using strategies such as focus groups, polling, formal/informal evaluation, and civic deliberation.

- The state should provide opportunities for comprehensive training for LEA and school leaders to learn how to meaningfully engage with their communities as part of LCAPs.

- Legislation should clarify accountability goals for each level of the education system.

- Legislation should enact reciprocal accountability mechanisms, such as trigger laws, that set clear goals for the state and are enforceable.

Recommendation 4: Align Education with Broader Systems of Care

- When revising LCFF, legislators should aim to coordinate LCFF with other relevant sectors, such as housing, healthcare, nutrition, child welfare, and behavioral health and developmental services.

- The state should continue working to align LCFF services with services provid-

ed through other funding, including community schools.

- Legislation should assist LEAs in braiding local, state, and federal funding to increase reimbursements to schools (e.g., Medi-Cal funding for mental health supports provided by schools).

Building on Previous Work

This study purposefully builds on other research on LCFF as well as a report from the NEPC and the Beyond Test Scores Project titled, *Educational Accountability 3.0: Beyond ESSA*.[4] That report outlined an approach to assessment of student learning and accountability for schools and LEAs that would be more effective and equitable than No Child Left Behind (NCLB) and the Every Student Succeeds Act (ESSA). *Educational Accountability 3.0* summarized the ideas and vision of a working group consisting of about two dozen leading scholars, setting forth two policy paths—an agenda for the next reauthorization of ESSA and recommendations for how local and state leaders might leverage some of the underutilized flexibility currently available under ESSA. The report's six top-line recommendations were:

1. Align assessment policy with goals for high-quality curricula and instruction.

2. Develop a system with reciprocal accountability.

3. Ensure that representative community members play a meaningful role in the system.

4. Move toward a broader array of school quality indicators.

5. Ensure interpretable and actionable results.

6. Design a system that will evolve and improve.

These ideas formed a starting point for this study because the six recommendations share key commonalities with LCFF/LCAPs. We began this project, in fact, with the goal of understanding how a group of particularly knowledgeable, equity-focused people in California might adapt, develop, and respond to the *Educational Accountability 3.0* recommendations, as applied to LCFF and LCAPs.

When we presented *Educational Accountability 3.0* at a September 2023 briefing on Capitol Hill in Washington, D.C., there was considerable interest. Three members of Congress and approximately 30 staffers from other offices attended.[5] Although the political context has changed since then and there is little likelihood of an ESEA reauthorization from this Congress, we hope the ideas from that earlier report and from the current study can help lawmakers and others in California as they consider next steps for LCFF/LCAPs.

Past Research on LCFF Effectiveness and Challenges

Because of California's significant investment in LCFF and the innovative nature of the legislation, its implementation has been well researched. The studies largely fall into three categories: determining the effectiveness of implementation, identifying challenges, and suggesting future revisions. We briefly review the first two categories here to highlight the knowledge base and to set the context for our recommendations. Regarding the third category, we integrate the past studies' recommendations with ours in the main body of this report.

A comprehensive quantitative study of the effectiveness of LCFF on student outcomes was conducted by Rucker Johnson and published by the Learning Policy Institute (LPI) in 2023. Johnson summarized his five major findings as follows:

> 1. LCFF improved students' math and reading achievement. 2. LCFF reduced the probability of grade repetition. 3. LCFF increased the likelihood of high school graduation and college readiness. 4. LCFF decreased suspensions and expulsions. 5. LCFF-induced investments in instructional inputs were associated with improved student achievement.[6]

He also found:

> The impact on student achievement grew with years of exposure to increased funding and with the amount of the funding increase. LEA investments in instructional inputs, including reduced class size, increased teacher salaries, and teacher retention, were associated with improved student outcomes.[7]

Additional studies validate the effectiveness of LCFF using other educational and organizational outcomes. We mention a select few here.

- LCFF had a positive impact on the percentage of high school graduates meeting UC and CSU entrance requirements, with the impact being higher in high-poverty school LEAs.[8]

- LCFF succeeded in creating "a more explicit link between funding and student poverty."[9] In addition, "state per pupil revenue increased in proportion to a LEA's poverty rate and its concentration of poverty."[10]

- LCFF concentration grants improved math and English language arts (ELA) test scores for targeted students, with the largest impact found for 11th graders who had the longest exposure to increased funding at the time of the study.[11]

Research also documents several challenges that LCFF has faced in attempting to address the adequacy and equity of school funding needs in California. Studies concluding that current education funding is inadequate explain that LCFF alone can-

not make up for other inequities and challenges, including historical injustice,[12] the COVID pandemic,[13] and increased pensions or health care costs.[14] Relatedly, because the LCFF formula requires that each high-needs student is only counted once, even if that student has multiple needs, LEAs are not receiving adequate support to meet complex needs. In large part because of California's unduplicated count criteria, "among the 27 states that provide flat rate funding weights for either ELL or at-risk students, California's 20% supplemental grant weight is among the lowest."[15] Further, other subgroups of students with high needs, such as homeless youth, are not accounted for in the current formula.[16]

Several factors appear to combine in preventing LCFF funding from reaching California's highest-needs students. LEAs receive supplemental and concentration funding based on their enrollment of high-needs students, but many LEAs do not spend the funding directly on those students, instead spreading it more evenly across LEA schools.[17] For instance, a study of LCAPs in the 10 LEAs serving the most foster youth found that many plans did not specify unique supports for those foster youth.[18] Similarly, at least some LEAs are not using known research-based strategies for increasing educational opportunities for particular subgroups, such as ELLs.[19] LCFF's concentration-grant approach has been flagged as a particular equity concern, since the grant does not reach high-needs students who are enrolled in school LEAs that do not quite meet the 55% threshold.[20] This threshold problem has negative impacts on student performance.[21]

A final equity concern involves the inconsistency of LCAPs across the state. Local control and flexibility have inherent benefits, but some LEAs have struggled to define clear measures of continuous improvement, particularly for ELLs and other marginalized subgroups.[22] This adds to the challenge of tracking the broader impact of LCFF statewide. Similarly, LEAs are inconsistent in how they engage communities and parents in the LCAP process, especially the parents of ELLs.[23]

The researchers behind these studies offered suggestions for improving LCFF and LCAP. Rather than review them here, we have integrated them alongside the findings from our study, presented below.

Our Approach

California is fortunate to have many experts in communities, schools, districts, and state agencies who have been engaged with LCFF/LCAP for years. This expertise comes through in the studies and reports discussed above, and it also benefited us in the design of our study. We reached out to Californians who know the system best, including community organizers, longtime advocates, educational leaders, and researchers. To increase the focus and productivity of our conversations with these experts, we drafted a *profile* document that we asked them to skim prior to those

conversations. That profile was updated throughout the process, but to build a comprehensive understanding of the reform context, the initial version was informed by the *Educational Accountability 3.0* report, by other research about LCFF/LCAP and accountability systems more generally, and by conversations we pursued with NEPC fellows and other partners with firsthand knowledge of California. This process allowed us to identify key policy ideas being discussed and potential participants for interviews and focus groups.

We subsequently interviewed nine experts to gain additional insights and specific ideas for revisions to the profile. After each of these nine interviews, we considered updates to the profile, so that the next expert would comment on all working recommendations up to that point. After all interviews were completed, we analyzed interview data holistically and drafted a final profile to use in our focus groups.

We conducted two online focus groups with six people each over a two-day period. Each group was facilitated by two researchers and was intentionally diverse by expertise, professional role(s), and LCFF experience.[24] The discussions followed a loose format of asking participants to discuss a prompt on the protocol, offer initial reactions, suggest changes, share examples, and offer reflections. The participants were also encouraged to raise new questions and possibilities that were not yet captured in the profile.[25s]

Recommendations for Improving LCFF/LCAP

Recommendation 1: Increase Education Funding

Our participants were clear that in order to implement their key substantive recommendations for improving LCFF, California must go beyond reallocating currently inadequate funds. California's education system needs additional funding, because present funding levels are not sufficient to offer all students high-quality education opportunities. This overall inadequacy of education funding in California is well-documented in earlier research studies.[26]

Specific Recommendations From Our Participants:

- Legislation should increase the LCFF base grants and increase the size and weights of the supplemental and concentration grants that LEAs receive for existing and new groups of students (as set forth in Recommendation 2).

- Legislation should address property-tax disparities associated with Proposition 13.

- Increased funding should be accompanied by increased transparency. LEAs, in particular, should clarify how and where education funds are used.

Discussion

Participants in our study suggested creating a higher foundation of funding and then ensuring that the funding grows incrementally over time to meet additional needs, population growth, and/or inflation of educational costs. All students, they said, should benefit from the additional funding, but there is a need for greater resources among the most marginalized students. In particular, the weights of both the supplemental and concentration grants should be increased in the LCFF formula.

Other researchers have concurred with this recommendation.[27] Kaplan (2025) explained that California's current supplemental grant weight is lower than what other states recommend for adequacy, especially because LCFF only allows for unduplicated student counts. He also explained that increasing the supplemental grant weight would benefit students with greater needs in LEAs that are ineligible for concentration grants.[28] Similarly, proposed legislation AB 1204, which came to a standstill in May 2025, called for increasing LCFF base and supplemental grants and lowering the qualifying criteria for LEAs to qualify for concentration grants.[29]

Our participants also explained that additional resources should address students' opportunities to learn and thrive in a broad sense that reflects research findings about comprehensive opportunity gaps. For instance, we know that most opportunity gaps that arise outside of school result from poverty, that poverty is racialized in our society, and that concentrated poverty in neighborhoods is particularly harmful.[30] If state lawmakers do not address these poverty-related obstacles, then children will not have equitable opportunities to learn and thrive. Recognizing this, one participant focused on food insecurity and offered the example of the importance of universal meals, saying:

> This [isn't] just about one cohort of students getting more. . . . It can be . . . a more holistic approach. . . . [U]niversal programs . . . obviously have a great deal more benefit for those families who have greater need . . . [but they provide] a tangible benefit for all."

A hurdle to maintaining, let alone increasing, funding for education is the expiration of Prop 55 funding, looming in 2030. As of 2024, Proposition 55—which passed in 2016 and extended the tax increases that were associated with 2012's Prop 30—generated more than $104 billion in total.[31] Calling attention to this urgent matter, a participant explained:

> There needs to be a new proposition on the ballot to extend those increases. . . . [As] I think about the sequencing of things. . . . it seems like [it should] be a higher priority . . . [because] it's already something in place . . . [and it] wouldn't necessarily be framed as [a tax] increase.[32]

Participants also suggested the state could charge a sales tax on services similar to

existing sales taxes on goods. A concrete suggestion in this regard was to tax stock sales, which would increase taxes for wealthier people without directly increasing the tax burden for low-income people. (Sales taxes on goods are typically among the most regressive taxing options.) Another participant suggested that state lawmakers revise California law to allow for greater local property tax authority similar to what other states allow. The participant argued that this could "bring . . . sometimes competing interest[s] together to collaborate." But this change would require changes to the rules set by Proposition 13.

More broadly, participants readily agreed that property tax disparities and rules associated with Proposition 13 should be addressed. As one person noted, "I think [Proposition 13] still continues to be a key vehicle and the one that's probably been the most fleshed out," in terms of reform ideas. In brief, since 1978, Proposition 13 has limited commercial and residential property taxes across the state. Although an attempt to reform this tax limitation did not pass in 2020, participants suggested revisiting the idea of bringing the assessed valuations of commercial properties up to current levels to raise more money for education.[33] Participants also suggested that the cap set by Proposition 13 on the annual growth in assessed property value be increased from 2% to 5%.[34]

Concerns about the so-called Basic Aid (or "excess tax") districts also came up in the discussions. The property taxes of districts receiving this aid generate revenue that exceeds the guaranteed minimum set by the state. Accordingly, the LCFF formula does not send any significant funding back to the districts; instead, the districts retain the excess. Participants suggested including these Basic Aid districts within the LCFF funding and distribution, with excess revenues shared with the rest of the state. However, due to concerns about addressing Proposition 13 and more generally about raising taxes, participants noted the political resistance that would arise from adjustments to the state's Basic Aid approach, especially coming from those high-revenue districts. A research study from Policy Analysis for California Education (PACE) provides a more in-depth analysis of how changes to funding for Basic Aid districts could impact equity.[35]

The most recent adequacy study to look at school funding in California was conducted prior to the COVID-19 pandemic, in 2018.[36] As of the publication date of this report, no future adequacy study has been commissioned. Multiple participants, however, stressed the need to have updated knowledge about sources of funding and how it is being spent. A participant also expressed frustration with the ambiguous adequacy standard itself, saying, "Despite all the studies that have happened in California, I don't know that there's agreement on what that [adequacy] number is."

Our participants also questioned how education funding policy is communicated, including the words used around resource inequity. Participants emphasized the need to invest more effectively in tools that help communicate to the public how school

funding works, where it is allocated, and why it is necessary. Responding to concerns around the lack of transparency, a participant said, "[People] say it just feels like . . . [money] goes into a big hole, which is . . . the education budget." Increasing the public's knowledge and understanding of education funding might increase public political willingness to boost education funding. Relatedly, a participant wondered about the wisdom of highlighting all the deficiencies (e.g., low test scores) that "grab headlines." This participant further contended that such headline-grabbing discourse leads most people to think that there is a "problem with public schools." In contrast, multiple participants suggested emphasizing "daily success stories" in schools to encourage more investment. They emphasized the need to "demonstrate the value of a public-school education for all families." Participants also argued that the language of adequacy is ineffective. The word is not received well when in conversation with people who are invested in education but who lack fluency in education policy-speak.

Our participants' concerns about communication align with those expressed in other LCFF research. For example, Zarate and Gàndara (2022) concluded that LEAs should be required to provide clear explanations of how supplemental and concentration funds will advance research-based strategies for increasing education opportunities and outcomes for ELLs. They explain that it is currently difficult to track how these grants are spent and how that spending directly improved educational outcomes for identified students.[37] Also, a report from two California advocacy organizations called for the state to "[p]rovide clear guidance and support to LEAs on creating and describing specific actions (as opposed to vague or bundled actions)."[38]

Recommendation 2: Center Equity Through Better Measures and Distribution

Closely related to Recommendation 1 (increasing overall education funding) is ensuring that current and new funding is distributed in the most equitable manner. Our participants were clear that both the high-needs populations of students already targeted by LCFF and additional groups of marginalized students not targeted by LCFF need additional support. To support these students, state officials should make future adjustments to the formula to holistically consider income levels and degrees of need. The state should also more broadly revisit the strategic distribution of resources.

Specific Recommendations From Our Participants:

- LCFF should use more accurate and nuanced indicators of poverty.

- LCFF should account for gradients of poverty experienced by students and served by schools.

- LCFF should ensure that supplemental and concentration funding that LEAs

receive for high-needs students is used for those same students at the school level.

- LCFF should change its current approach of using unduplicated counts, accounting instead for multiple categories of needs for a given student.

- LCFF should include additional categories of students with higher needs, including unhoused students, Native American tribal members, and students with greater needs as measured by a new statewide version of LAUSD's SENI.

- The state should consider whether a funding formula based on enrollment or attendance better addresses fairness and equity.

- The state should consider addressing the staffing needs of schools and LEAs that have higher concentrations of poverty.

Discussion

Our study participants reminded us that the free and reduced-price meal (FRPM) rate exceeds 60% in California public schools. This suggests the possibility that there is so much need in California that poverty-based funding, while certainly being distributed to LEAs with need, might not be concentrated enough in LEAs with the highest needs—essentially a triage/gradient issue as well as a measurement issue.

The latter issue is due to the imperfect data sources available for measuring poverty. Our participants flagged that the FRPM approach has become near-obsolete as a measure for poverty, because the state adopted universal meals, and families no longer need to sign up for their students to receive the benefit. They pointed to several alternative ways to measure poverty: direct certification (using data from other government assistance programs like Medi-Cal and SNAP to automatically identify eligible students); using California income tax data (to estimate family income); using census data (a calculation of the average income-to-poverty ratio—that is, family income in relation to the federal poverty level—in the school's surrounding area); and using a composite index of community and education needs like LAUSD's SENI. However, significant decreases to federal Medicaid and SNAP enrollment as a result of the 2025 Reconciliation Bill (known as H.R.1 or the One Big Beautiful Bill Act) means that some of the direct certification measures previously used will not be as useful for identifying all students in need. Although participants agreed on the necessity of more accurate data, they shared concerns about each of these options and noted that politics, paperwork, social capital, time, and administrative hurdles can all be impediments to gathering it. Rather than advancing a single solution, participants suggested that the state commission a study to develop a poverty measure that most accurately reflects LCFF's equity intent.

Such a state-commissioned study should consider the following concerns expressed

by our participants. They told us that most LEAs already utilize direct certification to help determine FRPM program eligibility. However, they also shared that direct certification does not fully capture all low-income students because undocumented students and students from mixed-status families are hesitant to apply for benefits, especially given the anti-immigrant national context. In addition, as mentioned above, recent cuts to these federal programs will likely result in an undercounting of need. Participants explained that using California income tax data is limited because individual tax returns do not capture items such as business earnings or family wealth, and the school-choice landscape makes it hard to map income tax data to a school's student population. Participants also pointed to the unreliability of census data and (again) the messiness caused by the school-choice landscape. As one participant explained:

> One of the things that makes census-based data tricky is that 10% of the kids are in charter schools that don't have geographic boundaries. So, whereas we can map census tracks to school district boundaries, and that mapping has been done, [charter schools] don't adhere to those boundaries. [F]iguring out how to handle that would be a complication.

Our participants agreed that SENI's criteria are more comprehensive than LCFF's and thus it could help identify more low-income students. However, participants expressed concern that many LEAs would need to collect and analyze new data to implement this statewide. In fact, our participants agreed that all the options discussed would require the state to invest in systems that produce a significantly better data infrastructure.

A research study from the Public Policy Institute of California (PPIC) offers an excellent starting point for the state to investigate and then choose a more effective poverty measure. Similar to the concerns raised by our participants, the study concludes, "FRPM generally has worse predictive power for student outcomes than alternative income measures or indices."[39] The researchers suggest that the state explore alternatives such as the systemic and supported use of direct certification or the development of "broader need indices that account for community conditions" and also provide a case study of SENI.[40] Lawmakers should carefully investigate whether these or other possibilities (or some combination of two or more) should be legislated as a requirement rather than an option and/or should be facilitated by the state because there are strengths and benefits to each.

The triage/gradient issue raised by our participants is simply that LCFF should account for the range in different families' levels of poverty. A child in a family living in deep poverty generally has greater needs than a household with income between 130% and 185% of the federal poverty level (the eligibility range for reduced-price meals). While LCFF currently considers the gradient of poverty across the school population (i.e., responding to a given LEA's higher or lower number of students

with greater needs), this is not nuanced enough to capture this gradient of poverty as experienced between students.

Participants also stated that LCFF should account for regional variations in the cost of living. A given dollar in the budget of a family or a school district will generate different resources in San Jose versus Fresno. As one participant said, "[You can't] get to equity without [considering] cost of living." Respondents noted that such disparities mean that "many communities can't find fully qualified staff" in areas where housing costs are more expensive. A revised LCFF should attempt to account for these differences. Recently proposed legislation (AB 1204) would more holistically consider economic disparities between regions, particularly around costs of labor and housing.[41]

A closely related issue involves the size of LEAs. Economies of scale benefit LEAs with, for instance, tens of thousands of students compared to LEAs that serve 20 students or fewer.

Another gradient issue discussed by our participants concerns the LCFF concentration grant at the LEA level specifically. Currently, if a LEA has 55% or more students with high needs, the LEA receives a concentration grant. This grant provides an additional 65% of the base grant level for each high-needs student above the 55% threshold. Our participants suggested that LCFF should be revised to include a graduated increase in funding as the percentage of high-needs students increases rather than this single threshold of 55%. So, for example, a school with between 40% and 55% high-needs students might receive a concentration grant, providing 50% of the base grant for each high-needs student above the 40% threshold.

Notably, Kaplan (2025) similarly concluded that the eligibility threshold for concentration grants should be lowered, either by lowering the percentage or creating a graduated increase akin to what our participants suggested.[42] Similarly, AB 1204 proposes to lower the concentration eligibility threshold to 45%.[43] Participants did express concern, however, that with a given pot of LCFF funding, funding gradients would take money away from the schools with the highest concentration of needs, a point which emphasized the vital need to increase overall education funding statewide.

Relatedly and aligned to recommendations from other LCFF research,[44] our participants suggested that LCFF should ensure that high-needs students who are counted in concentration and supplemental grants via LEA funding are benefitted by the provision of research-based resources and opportunities to learn. Participants emphasized that the equity intent of LCFF is successful in getting LEAs to count low-income students, ELLs, and foster youth but less successful in ensuring that the concentration and supplemental funds are used for proven education supports that help these same students. Part of the challenge is that students are counted at the school

level, then funding is distributed to the LEA; but LEAs do not consistently track or communicate the ways they get that funding to schools and students with the highest needs.

Participants therefore agreed that LEAs should be incentivized to identify research-proven interventions specific to each target group in their LCAPs. One participant offered the example of dual language programs, which have a strong research base showing increased educational outcomes for ELLs. LEAs that receive supplemental and concentration funds for ELLs, this participant suggested, should be incentivized (with even more funding) to use the money to create, build, and expand dual language programs. This recommendation is similar to recommendations made by Zarate and Gándara (2019) that LEAs should be required to have measurable outcomes of broad academic development for ELLs in LCAPs and that LEAs should distribute supplemental funds to schools in direct proportion to their enrollment of high-needs students.[45]

In giving LEAs local control, our participants noted, LCFF allows them to spread concentration funds across schools regardless of where students are enrolled. A participant provided the example of a district that failed to meet LCFF's equity intent in its plan to increase staffing and support. Because increases in staffing were made

> at every single school site . . . senior teachers end up in the low-poverty schools . . . [and less experienced teachers] end up in the [high-poverty schools]. . . . [It] starts off looking like an equity policy . . . focusing on kids with the greatest needs, . . . [but] it's not necessarily the [schools with] high concentrations [of poverty] that are getting the extra benefit.

To address these kinds of concerns, participants again raised the idea of requiring LEAs to use something like LAUSD's SENI to distribute money to schools.

Another aligned suggestion is to build on the changes already made through the LCFF Equity Multiplier.[46] These additional resources are provided to high-needs schools—those with high non-stability (i.e., transiency) rates and where at least 70% of students are socioeconomically disadvantaged. The Equity Multiplier addresses critiques from early LCFF research by requiring that LEAs receiving these funds include specific LCAP targets and measures for high-needs students specifically. However, the amount of funds available through this program is budget dependent, since the funding is outside the LCFF formula.

Consistent with the findings of several earlier studies,[47] our participants strongly agreed that LCFF should better account for students who experience multiple categories of needs. Currently, supplemental and concentration grants through LCFF are determined based on the unduplicated numbers of low-income, ELLs, and foster-youth students enrolled. But, if students meet multiple categories of need, our participants agreed, schools should receive extra funding to support those students.

One participant explained it this way: There are "increasing levels of challenge for [many schools, because] there's not increasing funding for a student who . . . [has] more than one" category of need. By using this approach, a LEA serving a low-income, ELL student in foster care would have that student counted in all three categories, increasing a LEA's supplemental grant and increasing the number of LEAs that qualify for a concentration grant.

Emphasizing this point, our participants noted that schools serving many students with multiple needs are likely being called upon to address concentration effects of poverty and marginalization. "[H]aving that higher percentage more often than not signifies that that community has less political power [and] that there may be environmental conditions [and] toxicities that are pushed into this community," a participant explained. The same participant contended that all counts and measurements used within LCFF should be re-examined to ensure a full understanding of contextual factors, thereby ensuring that the equity intent of LCFF is fully implemented.

Adding context to this point, Kaplan (2025) explained:

> If policymakers changed the LCFF's fiscal design and implemented this additional funding for students who meet the criteria of multiple groups, it would join the majority of states that provide this type of additive funding to address the distinct needs of different student groups.[48]

Proposed legislation AB104, mentioned in Recommendation #1, would allow for such duplicate or triplicate counts of high-needs students.[49]

Our participants raised the additional concern that LCFF does not capture key needs of students in their diverse state. They suggested expanding the high-needs categories to include unhoused students, Native American tribal members, and students with greater needs as measured by a new statewide version of something like LAUSD's SENI. Participants also flagged African American students as uniquely marginalized and needing additional resources, but they felt hamstrung by legal limitations on the use of students' racial and ethnic identity. The three potential new categories they did identify would, nonetheless, help bring resources to schools serving more of the state's highest-need students. Other research[50] and proposed legislation[51] also point to including unhoused youth in LCFF, and advocates have suggested SENI to "modify the funding model to better target student racial groups."[52]

However, participants again cautioned that adding such student groups should come with additional funding, rather than diluting the current budget. As one participant warned, "If you mess around with this sliding scale [on the concentration grant part of the formula] and you dilute it so much, you're going to move backwards." To counter the possibility of diluting revenue streams that reach students with the high-

est needs, our participants were most comfortable suggesting that their recommendations—for new categories of high-needs students and for reaching more students through a graduated formula—apply to any extra funding, but many also felt that the entire LCFF system of funding allocation should incorporate the suggested changes.

Participants also highlighted an ongoing discussion in California about whether education funding through LCFF should be based on a school's enrollment or on attendance or perhaps on a combination of the two. According to a 2022 PACE report, using enrollment would increase the cost of LCFF by as much as $3.4 billion annually.[53] Absent a new source of revenues, this would entail shifting Proposition 98 funding away from other public services (e.g., libraries and transportation). Our participants thought this was an important conversation to have, but they saw benefits and drawbacks in each approach. Enrollment counts are viewed as less volatile, and LEAs with higher poverty are typically subject to higher rates of absenteeism due to factors outside of the school, which are two arguments in favor of the shift. But others noted that this approach could create the wrong set of incentives, especially in a school-choice context, for ensuring that enrolled students are attending school, a problem that has been documented with virtual (online) schools.[54]

As the methodology for ensuring that funding reaches the highest-need students improves, participants also considered improvements to staffing. At the most basic level, once additional money reaches schools, it should translate to more staff serving the students. But our participants focused on a different issue. Within any given LEA, school-level spending tends to be substantially higher in schools serving students from higher-income families. This is because most spending is on personnel (salary plus benefits) and because more senior teachers, who have higher compensation, tend to move to those lower-poverty schools. Those schools have the benefit of more experienced teachers, and our participants suggested that LEAs should assist schools with less experienced teachers—especially those who work with a greater concentration of high-needs students—by providing substantially more staff. This change, they suggested, should be addressed within LCFF.

One concern, however, is that a formula providing additional staffing funds to high-needs schools with less experienced teachers could create an incentive for leaders of those schools—those who have the discretion to do so—to shift hiring and retention even further toward those less experienced teachers. The suggested policy change should therefore be carefully crafted with such cautions in mind, even though the caution itself should not be read as an argument for inaction. In fact, the recommendation made by our participants aligns well with a PACE research study on LCFF that includes the following recommendation: "Equitably distribute effective teachers. Increase transparency and accountability around how teachers are distributed and sustain and grow policies and programs that increase equitable access to effective teachers and improve teacher working conditions."[55]

Recommendation 3: Advance Participatory and Reciprocal Accountability

Participatory accountability involves democratic systems supporting meaningful engagement with advocacy organizations, community members, families, and students across the federal, state, regional, county, and classroom levels of the education system. **Reciprocal accountability** concerns the importance of both top-down and bottom-up responsibility, with policymakers responsible for providing needed capacity and resources to LEAs, county offices of education, and schools—not just schools, teachers and students being accountable for teaching and learning. This higher standard of accountability would mean that LCAP teams must be required to include this broader group of participants in setting LCAP goals, and the broader group of government leaders must be held accountable for meeting them. Below, we discuss how our participants approached each of these, starting with the former.

Participatory Accountability

The LCAP process aims to engage community members in making meaningful decisions about an LEA's goals and priorities. It was, in fact, cited as a model of participatory accountability in the *Educational Accountability 3.0* report.[56] While our participants agreed that the LCAP process had thus far increased community engagement, they saw it falling far short of meaningful democratic participation and deliberation. They suggested revisions that would create a multilayered system of engagement.

Specific Recommendations From Our Participants:

- LEAs should set clear educational and spending goals in LCAPs, use understandable indicators to track progress toward those goals, and report results in an accessible dashboard so that non-expert community members can easily understand how their school, LEA, and state are doing.

- The state should provide better technology for LEA leaders to create and monitor LCAPs.

- Creating and monitoring LCAPs should be an engaged and ongoing learning process, helping LEAs and communities collaborate, understand, and improve.

- The state should incentivize LEAs to hold regular community meetings, where LEAs share the results of their LCAPs and get feedback from the community. This expanded participatory accountability should reach and involve a broader part of the community by using strategies such as focus groups, polling, formal/informal evaluation, and civic deliberation.

- The state should provide opportunities for comprehensive training for LEA and

school leaders to learn how to meaningfully engage with their communities as part of LCAPs.

Discussion

Although participants agreed that the LCAP process should include deeper democratic deliberation and engagement from parents, students, and other community members, they told us there is currently a lack of consistency from LEA to LEA. Several of their recommendations set forth in the above bullet points—better indicators, regular opportunities for formative feedback along the way, training in effective community engagement, and better technology—address the inconsistency. Another suggestion was to broaden participation by making a concerted effort to bring in more "voices of young people."

Our participants maintained that the first step to meaningfully engaging communities in the LCAP process is to ensure that the actual LCAP document provides clear information about the LEA's goals, how the goals are measured, and the progress being made on the goals at the school, LEA, and state level. Yet, as one participant explained, there is currently a

> tension around what that [LCAP] document is trying to hold. It's really long. It's really complex. It's been revised a bunch of times. . . . Is it really an accountability tool? Is it really a strategic planning tool? Is it [really] supposed to be accessible to the public?

Both the state and LEAs have a role in improving this system. At the LEA level, our participants recommended that leaders prioritize goals for improvement that are directly tied to improving educational opportunities and outcomes for the highest-needs students. LEA leaders should also select and regularly report on clear measures of progress. Other research studies[57] and advocacy reports[58] have made similar recommendations. For instance, one participant suggested that parents should be able to access, on their mobile phones, a dashboard showing each LEA's progress. In contrast, as noted by a different participant, "right now if you open any LCAP, even the most transparent ones like in Oakland, or something like that, . . . it's just such a cumbersome [document]."

Aligning with earlier research studies[59] and advocacy reports,[60] our participants emphasized that an important part of an improved LCAP process is being able to track how, where, and why money is spent. As one participant shared, "I think the broader problem is we just don't track the school level. . . . We need to figure out a way to track how the LEAs are spending money in their school sites." Our participants emphasized that they should be able to see how funding generated when schools enroll high-needs students was spent by those schools on proven strategies for helping those particular students. Or in the words of one participant, LCAPs should include

"assurances that the dollars, the extra dollars that are generated, actually go to address the needs, the extra needs, and provide high-level service." Towards that end, participants suggested better integration of the LCAP process into regular school board activity and developing better indicators of improvement that more people could easily understand.

Our participants further suggested that the state-provided LCAP template needs to be revised so that LEAs can successfully use it to measure their own progress and compare their progress to other LEAs. The state should, they said, also provide incentives for LEAs to prioritize proven solutions specifically for the groups of high-needs students targeted by LCFF. So, for example, the state should incentivize the adoption of strategies for improving educational outcomes for ELLs—like dual immersion schools—specifically. Notably, Public Advocates and ACLU of Southern California made very similar recommendations in their LCFF report.[61] Several participants in our study discussed the unwieldy nature of the LCAP templates currently provided by the state. Those templates include several fillable forms, some of which are online and interactive while others must be downloaded onto a computer.

With stronger and more accessible information in place, the next step in improving LCAPs and LCFF is improving the process of community engagement. Our participants contended that LCAP should be an engaged and ongoing learning process for LEAs and communities to collaborate, understand, and improve. In the words of one participant, "success is where parents [and] community members feel like they knew what they were reading and knew they had the opportunity to provide feedback, saw their feedback, and [knew] that their feedback was considered."

Based on what we heard during the study, we suggest a scaling up of California's Community Engagement Initiative (CEI), which began in 2018 and was expanded in 2022. CEI explains its purpose as fourfold, mirroring in many ways the recommendations made by our participants for improving LCAP:

- Building capacity in communities and school districts to have difficult conversations with each other and build trust, with a focus on improving outcomes for pupils.

- Identifying effective models of community engagement and metrics to evaluate those models.

- Developing effective peer-to-peer partnerships between school districts and county offices of education to deepen community engagement.

- Improve community engagement statewide and incorporate practices that prove effective toward school district and county office of education continuous improvement efforts. (CEI, 2025)

The CEI provides resources that school districts can apply for, using an opt-in strategy. This strategy improves buy-in and likelihood of success. But community members within less enthusiastic school districts have not been benefiting. Though participants shared concerns about forcing districts to opt into a program, they also expressed a need for their district and school leaders to be provided with the kind of support offered by CEI. So, finding a way to offer and incentivize participation, rather than a mandate, is important. Participants suggested the CEI process could be initiated by community members. Notably, reports from EdTrust West and from Public Advocates and ACLU of Southern California—all organizations deeply respected for working with communities across California—also recommend expanding the CEI initiative.[62]

Participants also shared ideas for how LEAs can expand participatory accountability to a broader part of the community, using approaches such as focus groups, polling, formal/informal evaluation, and civic deliberation. They shared examples of effective efforts in relatively small university-community partnership programs. For instance, public involvement in conducting formal, or informal, evaluations could be designed to draw upon local knowledge, since local stakeholders attuned to their community's needs are best positioned to apply what they see as the most salient criteria of school quality. Participants also suggested LEAs should develop and implement strategies to facilitate ongoing feedback over several years. LEAs, they said, should avoid the formalism of mere checklists and instead provide community members the opportunity to ask and answer questions during regular LCAP meetings. In this way, the LCAP process could be a potential site for critical democratic participation. Our participants were not naïve about the hurdles to accomplishing this beyond a select group of LEAs, but they saw the need to work toward this key goal with a serious and deliberate commitment.

Although participants wanted to see LEAs taking actions that would garner greater community involvement in the LCAP process, they also voiced a concern about this broadened participation opening the door for more people to use education for political opportunism and "conflict campaigns." As one participant stated, "Inviting in more public participation . . . means more threats [and] more misinformation." Even though democratic participation can be messy and ugly, short-circuiting that participation necessarily undermines the LCAP process.

Participants were divided about the idea of formally including community-based organizations (CBOs) as part of the LCAP process. Some were skeptical about relying too much on private nonprofits to shape or facilitate community participation. Another participant, however, discussed how critical these nonprofits are to generating family engagement, saying, "[It] depends on the [CBO] structure, [but] . . . there are certain communities where CBOs . . . bring a lot of strength [to local] relationships."[63] Despite the importance of this family engagement, the participant pointed out that these groups do not currently receive LCFF support, recommending that

LCFF funds be routed to some CBOs. The inherent discretion of selecting which CBOs deserve support is, however, problematic, and other participants expressed concerns about moneyed interests using CBOs in an "astroturf" effort to eclipse the authentic interests of students and families. The focus group discussion thus raised the CBO issue, but the group did not arrive at a concrete recommendation.

Participants clearly called for better training for people involved in the LCAP process. They explained that facilitating true community engagement—across economically, linguistically, and racially diverse communities—is a specialized skill, and many school and LEA leaders have never received training in this skill. Their discussion reflected the following recommendation from an EdTrust West report:

> The students and families most affected by systemic disparities have the best insights on solutions for those disparities. Local education leaders must build trusting relationships and must share information with all students and families, particularly the most marginalized. Education leaders must regard students, parents, teachers, and members of the community as partners and collaborators in decision-making and must commit to meaningfully engaging them in the LCAP process. For this to be a reality, the state must invest in providing local education leaders, parents, students, and community stakeholders with the training necessary for this crucial engagement work.[64]

Participants also discussed the importance of scaffolding the participation of parents and students with learning on budgeting and education policy. "If you're going to expect parents and community members to step into this new role that may feel countercultural to them in many ways," said one, "you need to provide really overwhelming support . . . to build their confidence in their role and in their ability to participate."

Reciprocal Accountability

LCFF/LCAP should include accountability across all layers of the system, according to our participants. Specifically, legislation should clarify the governance of LCFF, and mechanisms should be enacted that hold state entities accountable for their fiscal obligations to schools. These elements of reciprocal accountability require collaboration among leaders at the school, LEA and state levels, because lawmakers and others at the state level shape the context within which school districts, schools, teachers, and students pursue their work. These policymakers have an ongoing obligation to provide needed capacity and resources to school districts, county offices of education, and schools.

Specific Recommendations From Our Participants:

- Legislation should clarify accountability goals for each level of the education system.

- Legislation should enact reciprocal accountability mechanisms, such as trigger laws, that set clear goals for the state and are enforceable.

Discussion

Participants pointed out that an accountability system is not complete if it only includes a conventional system of top-down accountability. Those at the top, particularly the legislature and governor, have crucial roles in providing educational opportunities to all young people. When those at the top come up short, no amount of demands for better results will substantially improve the system. Participants were clear that the state must be held accountable for their primary education responsibility of providing the funding schools need to educate students. This additional type of accountability would require new legislation, outlining the role of each layer of government in supporting education, and including enforceable consequences if those roles are not met. Participants also shared ideas for creating new levels of democratic participation at the state level. One participant pointed to the possibility of creating a children's council that works in collaboration with the Office of the Governor—something similar to the Early Childhood Policy Council established by the Office of the Governor, which is made up of experts who advise the governor, legislature, and superintendent of public instruction. A state LCFF council could parallel the LCAP LEA-level process by creating a space for democratic discussions around state decision-making.[65]

Another participant pointed to the idea of creating a statewide student bill of rights and having school and LEA leaders report on progress towards them in regular LCAP meetings. This participant further explained that a bill was introduced into the California Assembly in 2001-02 by then-Assemblymember Judy Chu based on input from youth researchers and community organizers.[66] The bill would have established a state guarantee to educational opportunities like learning materials and resources, qualified teachers, and a safe and supportive school environment. Though the legislation never made it out of the committee, the idea, developed by youth and community members, provides a strong example of what reciprocal accountability could look like—students, parents, and community members regularly review data about how well the state, their LEA, and schools are doing in providing learning opportunities to all young people.

Our participants said that this multi-level accountability is important not just for the state but also for counties. Such legislation should add clarity by developing understandable indicators and measures of progress for county offices of education. As in

the discussions of participatory accountability, participants explained that non-experts should be able to access and understand how effectively each layer of the government is in meeting its responsibilities. In their report, Public Advocates and the ACLU of Southern California similarly recommended both increasing support for and auditing county offices of education "to evaluate whether they are fulfilling their review, support, and accountability duties under LCFF."[67]

Participants discussed several concrete ideas, including legislated "trigger mechanisms" associated with reciprocal accountability. For example, an accountability law might create a fund potentially available to schools that are not meeting accountability goals. When a school is identified as underperforming, an LEA could apply for these funds if the state is not meeting its resource obligations. Any punitive accountability measures of the school or LEA would be delayed until the state's funding obligations are met.[68]

That said, one challenge inherent in this type of reciprocal accountability system is that it could generate unwelcome litigation. Because of this potential, any system should be structured with clearly articulated standards and barriers to frivolous claims, and a hearing process could be required prior to any litigation—an *administrative exhaustion* requirement similar to the requirement that individuals first file a complaint with the Equal Employment Opportunity Commission or a similar state agency before filing a Title VII (employment discrimination) lawsuit.

Participants were cautious of any legislative or LEA actions that were excessively punitive. They preferred a reciprocal accountability system focused on building capacity and rewarding success. As one participant noted, "This statewide system of support is not supporting much . . . [We need] a way to actually incentivize actors within the system who are demonstrating success." Similarly, another participant shared, "I would like to see people get incentives for doing better. Because they got incentives for children failing." On that point, we raised our own caution about the distorting impact of high-stakes incentives. While ESSA criteria are broader than those of NCLB, any accountability system with meaningfully high stakes should use definitions of success that are aligned with effective pedagogical practices and that account for the vast inequities that exist outside of schools.

Recommendation 4: Align Education with Broader Systems of Care

To create an ecosystem of support that allows students to learn and thrive, participants suggested stronger alignment with sectors outside of school, including housing, food and nutrition, health care, and transportation. The revised system would build the robust connective tissue needed to link resources and support at the state, county, and school levels, thereby decreasing opportunity gaps inside and outside of

schools.

Specific Recommendations From Our Participants:

- When revising LCFF, legislators should aim to coordinate LCFF other relevant sectors, such as housing, healthcare, nutrition, child welfare, and behavioral health and developmental services.

- The state should continue working to align LCFF services with services provided through other funding, including community schools.

- Legislation should assist LEAs in braiding local, state, and federal funding to increase reimbursements to schools (e.g., Medi-Cal funding for mental health supports provided by schools).

Discussion

Proposition 98 revenue is a guaranteed source of funding for K-12 education in California. Other key services for families and children have no such protection. As one participant observed, "Education is seen from others outside of education as consuming 40% of the state's budget, and it's protected . . . [so] everyone else gets squeezed." We understand this perception; however, from the perspective of the child and the need to address that child's opportunities to learn and thrive, it would be difficult to prioritize schooling above health care, housing, food, and nutrition—all of which are important. The ideal system would ensure that these and other core needs of children and their families are fully met and that services are connected and coordinated.

Our participants urged government officials and advocates to consider what was referenced as the "non-98 side of the budget," which includes libraries, health care, school facilities, special education, social services, parks and recreation, and community colleges. Better coordination across these sectors, that are technically but not logically outside of educational domains, should help stabilize their funding sources. Participants also emphasized the need for a comprehensive overhaul that includes greater transparency regarding the allocation of funds.

Participants also urged the state to incentivize cross-sector collaboration. The collaboration could involve basic connections to community resources, as described by a participant who pointed to the efforts of the West Contra Costa Unified School District, which "brought people together . . . around adequate, accessible outdoor space to play." Participants said that such efforts need to be broadened and scaled up, which will require the state to play an active role, but which could pay off tremendously:

> [W]hat happens if suddenly public health and behavioral health and social

services and housing come to the table and [say], 'we're going to match your $200 million with another $50 million.' And then everybody puts in $50 [million]. . . . [Eventually,] you have a pool of resources that is based [on] a measure that is aggregating a set of understandings about the eco-system of need.

Another participant added that existing state programs—like the Children and Youth Behavioral Initiative, BH-CONNECT, and the Comprehensive Prevention Planning under FFPSA Part 1—provide both a model of, and opportunity for, further collaboration focused on closing the opportunity gaps that originate beyond the classroom. As another example, recent legislation to create a trauma-informed system of care for foster youth (AB 2083), requiring inter-agency collaboration, could be a starting point for helping school and country partners better collaborate in meeting the needs of foster youth.

Central to the issue of cross-sector collaboration is California's Community Schools Partnership Program (CCSPP), which should be sustained and expanded. ESSER funds initially prompted the program in response to the COVID-19 pandemic. It is grounded in a strong research base and is producing very real benefits. Yet, when discussing community schools, participants spoke about the lack of cross-sector collaboration, a weak public perception of the program, and funding limitations. Indeed, funding for CCSPP, which focuses on whole child and family support, is set to expire by June 30, 2031.

With the remaining five-and-a-half school years of current funding, one of our participants raised the concern that "community school [funds] just [go] to buying additional staffing within the school district silo." Lack of public understanding about community schools, along with impending financial limitations and skepticism about their effectiveness, should spur state officials and advocates to address how to most effectively integrate community school implementations with other initiatives that also address closing opportunity gaps.

Participants also called for LEAs to be more transparent and to clearly communicate the tangible resources (e.g., music and art programs, learning time, universal meals, or universal transitional kindergarten) that come from linking the K-12 school system to the broader set of community and public services. At the school level, participants suggested that the LCFF/LCAP system should connect directly to CCSPP, but with better support for existing community school coordinators.

Given the cross-sector nature of efficiently closing opportunity gaps, participants encouraged counties to adopt county-level liaisons who work across departments to organize and coordinate cross-agency collaboration. Participants explained that such county-level coordination would take structural changes and strong intentions to operationalize collaboration, but the results would be well worth the investment

of time and funding.

While local- and state-level investments in non-school sectors are essential, the federal government has an important role, too. Sometimes, federal resources are provided directly to families and communities, and at other times, those resources are provided to the state, thereby increasing the state's capacity. As one participant noted, "When we use the federal entitlements to [their] maximal intent," state-level resources are more plentiful. In 2023, California schools received over $620 million in Medi-Cal (Medicaid) funding, for example, and this spending benefitted many of the same students who met the requirements for LCFF concentration grants (e.g. low-income youth and foster youth). Medi-Cal helps pay for some direct health services as well as key school staff, such as social workers and psychologists, who are focused on mental and physical health.

While the federal role used to be fairly reliable, some of this funding is now threatened.[69] Participants also discussed how the data necessary to address out-of-school opportunity gaps could be compromised due to federal governmental interference, particularly surrounding immigrant families. The uncertainty arising out of Washington, D.C., underscores the importance of a muscular and engaged state role in addressing the issues highlighted throughout this report.

Conclusion

This report emphasizes a key finding of other reports—that California's LCFF/LCAP reforms have significantly advanced equity and local decision-making but still need to be improved in important ways. The fact that California is advancing equity in education in a moment where the federal government is turning away from the equity mission of public education makes these recommendations even more timely. California has the opportunity not just to maintain but to advance public education for all of its students. These changes provide another strategic moment for California to lead and model the equitable changes that are possible even in a limited or hostile federal context. But advancing these bold goals demands that government officials at multiple levels take correspondingly bold steps to meet current educational and social realities.

The participants in our report reaffirmed the need for increased and more equitable funding to sustain high-quality learning opportunities for all students, especially those facing the deepest poverty and multiple barriers to educational opportunities and success. Achieving true equity requires updating poverty measures, refining the distribution of supplemental and concentration grants, and ensuring that the system's additional resources for high-needs students reach them at the school level. Equally vital is strengthening reciprocal and participatory accountability, so that community members have a meaningful voice in shaping and evaluating education-

al outcomes. The recommended reforms also emphasize integrating education with broader public systems—such as housing, health, and nutrition—to address opportunity gaps beyond the classroom. Implementing these changes will require sustained public investment, cross-sector collaboration, and transparent communication to build collective trust and understanding.

The first decade of LCFF and LCAP transformed California's education system into one for more equitable funding and more empowered communities. The next decade must begin with a recognition that the reform still has work to do to fully meet its equity intent. Once state officials and advocates recognize this reality, they can work together to move the state forward to a second transformation that ensures the LCFF/LCAP system helps all Californians thrive.

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25 Focus group and interview participants were offered a $100 gift card to Etsy or Amazon as an incentive for participating. We recorded the focus group, then de-identified the data. We then used AI to transcribe the interviews. Transcriptions were uploaded into MAXQDA. Our data analysis process was iterative. We created a coding schema based on each suggested change to LCFF and then deductively added new codes. We then reviewed the data connected to each code, wrote memos, discussed memos as a team, re-coded and re-organized findings, and then wrote our final analysis. We then did a member check—sharing the final analysis with interview and focus group participants to check for accuracy.

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68   To make this example more concrete, California currently has about 9,500 district-run public schools and about 1,300 charter schools. If 5% of these schools are potentially subject to accountability sanctions, 540 schools (or, more accurately, their districts) could potentially make a claim alleging insufficient state support. Since the average public school in California enrolls about 580 students, and since the TK–12 portion of Prop 98 funding yields about $18,000 in per-pupil funding, the average public school in California receives about $10.4 million in funding per year. If the proven shortfall each year for these schools is 10%, that means that the total possible claim would be about $540 million (540 schools claiming about $1 million each). This rough calculation suggests that the reciprocal-accountability reserve fund would be less (and probably much less) than 0.5% of the approximately $115 billion annually in Prop 98 spending.

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