



April 13, 2022

The Honorable Anthony Portantino
State Senator
1021 O Street, Suite 7630
Sacramento, CA 95814

RE: SB 830: Education Finance: supplemental education funding
Position: **Oppose**
Set for Hearing in the Senate Education Committee: August 20, 2022

Dear Senator Portantino,

On behalf of the California Association of School Business Officials (CASBO), which represents over 24,000 school business leaders in K-14 education, we must regretfully oppose your legislative proposal, SB 830. The bill would create an additional funding formula using enrollment data and average daily attendance (ADA) to determine a supplemental funding allocation that is to be distributed utilizing the Local Control Funding Formula (LCFF), with the emphasis on chronic absenteeism and truancy.

Our current position does not signify our lack of commitment to ensuring equity and addressing all of the LCFF statewide priorities, of which chronic absenteeism is one. Our concern stems from the approach that this bill takes to divert limited Proposition 98 funds, creating a new formula to generate supplemental resources, in a manner that can create unintended consequences for local education agencies (LEAs) which, prior to the COVID-19 pandemic, may not have been addressing the root causes of their students' chronic absenteeism and truancy through the implementation of sound policies and procedures based on data and research.

The bill does not provide safeguards in ensuring that the funds are targeted to the issue it claims to be focused on: chronic absenteeism and truancy. The bill would provide additional funding to LEAs with lower attendance rates, without any state or county office of education analysis or review prior to distribution of funds to determine that LEAs with high chronic absenteeism rates have prioritized and impacted their chronic absenteeism and/or truancy rates.

The bill also creates a new funding source outside of the LCFF, which will complicate how LEAs report all available funds on their local control and accountability plans (LCAPs) to address each statewide priority. Lastly, the bill allows for "supplanting" of these resources, which will have varying results on how LEAs will determine how they address this one LCFF statewide priority, whether that is to spend additional funds on their current chronic absenteeism services and programs or maintain current funding and divert available local funds for other purposes, neither of which, again, are tied to chronic absenteeism or truancy.

This bill lacks an understanding of our current governance structure, which mandates that a school district which is placed on differentiated assistance by its county office of education for failing to make progress on a statewide priority and subgroup of students be required to conduct a root cause analysis with the county office of education to address these deficiencies and begin making progress. The bill does not indicate how an LEA is to be held accountable for addressing root causes of chronic absenteeism and/or truancy, which can mean creating a new reporting

requirement, further eroding the intent of the LCAP and its annual update that provides data into the School Dashboard, the state's online accountability system.

We do recognize that you and your sponsors are interested in resolving the discrepancy that can be created due to funding based on an ADA system, in which LEAs have to ensure that every student, regardless of their attendance record, has an educator, classroom space, instructional materials and equipment to attend school. We understand that the current system does not provide for such resolution.

Instead of pursuing a piecemeal approach to ensure the proper adjustments to our overall funding system are made, we alternatively recommend that you conduct an enrollment-based funding study that properly:

- Accounts for federal and state programs that are dependent on ADA information,
- Creates a minimum funding threshold to protect small school districts with low enrollment numbers,
- Reviews basic aid districts which generate funds through local property taxes instead of the LCFF and assesses how these districts monitor and establish accountability metrics for attendance purposes, and
- Reviews other geographically and demographically similar states on their accountability system for enrollment-based funding.

For the reasons outlined above, we must respectfully oppose SB 830.

Sincerely,



Sara Bachez
Chief Governmental Relations Officer
California Association of School Business Officials