

The Role of County Offices of Education in an LCFF Context: A Synthesis

Compiled by the staff of the California Collaborative on District Reform

Introduction

This overview summarizes the findings from three publications that explore the role of California's county offices of education (COEs):

- *Re-Envisioning County Offices of Education: A Study of Their Mission and Funding*
Legislative Analyst's Office (LAO), 2017
This report examines 2014-15 state funding to county offices and trends in the ways that COEs spent those funds. Among the main findings of the report are that there is variation in the types of services COEs offer (which the report finds are not always aligned to individual districts' needs) and that COEs spend at varying levels (e.g., per-pupil spending on county juvenile court schools ranges from \$6,000 to \$36,000).
- *Strengthening Local K-12 Accountability: The Role of County Offices of Education*
Public Policy Institute of California (PPIC), 2016
This brief reflects on LCFF implementation, building on findings from a 2015 PPIC report with new data collected from a range of stakeholders, including school-based respondents. The report seeks to address the role of COEs in supporting district LCAP processes, COE capacity, and COE authority needed to make the LCAP process work as intended.
- *Toward Quality, Consistency, and Continuous Improvement: Lessons about County Offices of Education and Partner Collaboration*
American Institutes for Research (AIR), 2017
This unpublished report documents an effort facilitated by California Education Partners to address COE service quality through a coordinated cross-county effort known as the California County Office of Education Collaboration (CCOEC). Leveraging participant interviews and document reviews, the report chronicles the structure, processes, and outcomes of the CCOEC—the most concrete of which were a county self-assessment tool and a district self-assessment tool designed to facilitate a process of organizational reflection and improvement—and considers cross-system collaboration as a possible strategy for advancing COE work. It also captures a set of guiding principles developed by the six participating county offices in the collaboration:
 - The new joint work of districts and county offices:
 - shifts from compliance to a commitment for mutual capacity building for the purpose of producing measurable gains in student learning and achievement
 - fosters systemic collaboration to improve student outcomes
 - builds a culture of co-learning and reflective inquiry that leads to sustainable change
 - promotes a culture of candor, evidence, and urgency to take action

Assembly Bill 1200 tasks COEs with monitoring and supporting the fiscal well-being of school districts. COEs provide a combination of required district services—including the operation of alternative schools, district fiscal oversight, and review of staff assignments and credentials—and optional services that respond to district requests, but are not required by state law.

Examples of these services include dissemination of information about state policies; teacher professional development; data support; career & technical education; preschool and childcare, and technical assistance for afterschool, drug prevention, and foster care youth programs.

Against this backdrop, the Local Control Funding Formula (LCFF) added the responsibility of approving the goal setting and resource allocation of school districts using the Local Control and Accountability Plan (LCAP) process. Signed into law in 2013, LCFF redesigned the state's resource allocation system to increase funding for the state's English learners, foster youth, and students from low-income families and to give school districts more autonomy to determine how they spend their funds. All three reports examine changes introduced through the passage of the LCFF and the implications of those changes on the COE system.

Common Themes

While the reports examine the function of COEs from different perspectives, some common observations emerged.

Variation in Types and Quality of Services

All three reports describe considerable variation in the type and quality of services provided to districts by COEs. The LAO offers observations about the types of services offered by COEs. First, services tend to vary by district size. Some COEs share administrative structures with districts and sometimes act as extensions of district staff, whereas COEs in some larger regions tend to focus on supplemental and enrichment services. Second, the report suggests that differences COE historical funding levels (which influence current funding allocations from the state) might shape service offerings differently depending on the setting. Third, COE superintendent priorities direct the focus of district offerings and capacity areas for COEs. The LAO report describes two types of superintendents, those driven by "interventionist educational philosophy" and those guided by "statutorily required activities." The AIR report similarly describes variation in type (and in quality) of services provided as due to a range of factors, including the size and internal capacity of supported districts, and the particular areas of focus and specialty within each county office.

Noting the absence of oversight or provision of quality standards to inform COE technical assistance, the PPIC publication expresses concern that COEs have no way of determining (and reflecting on) the quality and relevance of their services. In particular, the report points to the overall process for supporting underperforming districts, noting that the state offers no direction to COEs about their services beyond providing improvement assistance or requesting support from California Collaborative for Educational Excellence (CCEE).

Lack of Clarity About LCFF, LCAP, and the Shifting COE Role

The launch of LCFF and the LCAP regulations that accompanied it created new expectations for both COEs and districts, but little clarity about exactly what those roles entailed. The AIR report indicates that LCFF has "exacerbated existing challenges of capacity and consistency across COEs" (p.4) and points to the wide range and sometimes divergent information COEs provided to districts in response to their questions about the LCAP process. It quotes one COE leader as saying, "The state handed us something that was very unrefined and said, 'Go do it,' and implemented it before any of us had a real chance to plan for it...It really created variation.

That’s not a good thing.” The report goes on to quote another COE leader who explained the resulting statewide perception of the COE system: “County offices as a group were getting—still are getting—clobbered on this issue of inconsistency in their capacity to both review the LCAPs and assist districts doing a better job of putting together the LCAPs” (p. 4).

The LAO report attributes some of this confusion to the funding structure and allocations provided to COEs. It finds misalignment between state guidelines governing the use of COE funds and the actual programs and services that COE provide. COEs implement a wide range of services, but the LAO report finds that they generally they do so by spending less funding than LCFF allocates for required services.

Both the LAO and PPIC reports further indicate that for some COEs, current service offerings may not align with district needs as they stretch to implement the LCAP.

COE LCAP Role is Inconsistent with the Spirit of LCFF

Both the PPIC and the LAO reports discussed the inconsistency between the purpose and spirit of the LCAP, and the requirements defined for the COE role in supporting its implementation. On the one hand, rhetoric around the LCAP describes it as a process for facilitating continuous improvement in districts. On the other hand, the process positions COEs as compliance monitors. LAO frames the issue as one of loose accountability structures. The PPIC report calls to attention that while COEs have no “authority to approve the substance of LCAPs or require changes to district goals or improvement plan,” they do have the authority to deny and approve LCAP plans; the report describes this dynamic as adversarial and incompatible with the intended outcomes of the LCAP process.

Recommendations

Based on these findings, the reports offer some recommendations for improving the effectiveness of the COE system. Chief among these is an overarching theme to refine the COE role and funding to better support the implementation of LCFF.

Shift the COE Role to Focus the LCAP on Continuous Improvement

The PPIC report suggests a shift in the roles of COEs and districts in the LCAP process. The PPIC report suggests that COEs act not as compliance monitors but as “critical friend[s]” to districts. In this role, COE’s would not “intervene” in underperforming districts’ planning processes, but rather “collaborate” with them. Because of concerns about COE capacity to provide quality and relevant technical assistance, the report argues that the state should de-emphasize that expectation and give COEs authority to “disapprove LCAPs only when districts fail to heed the plan guidelines.”(p.16)

If districts are focused on continuous improvement instead of compliance, the new recommended COE role (as collaborator/partner) would be to engage the district throughout the three-year LCAP cycle. This could include working with districts to revise their plans or finding a neutral provider to conduct a district needs assessment, and then identify potential technical assistance providers (which could include, but would not be limited to, COEs) to support the district in making improvements to the plan.

Reallocate Funding (and Responsibilities) from COEs to Districts

The LAO report's recommendations support this change in role and suggest revisions to funding allocation to align with a more clarified and streamlined role for COEs. First, the report supports continued direct funding for COEs to provide districts with "core" oversight activities. It suggests COEs are well-positioned to provide fiscal oversight and monitoring, review and approve LCAPs, and do other kinds of monitoring activities. However, the LAO report also argues that there are some services that COEs should not offer. Specifically, COEs might not be best suited to operate court schools, and an analysis of COE finances suggests that county community schools are inefficient endeavors for COEs to operate.

The LAO report concludes that it would be more cost-effective to reallocate funding and responsibilities from COEs to districts because local districts might be better positioned to coordinate those services. The authors argue that the purpose of the LCAP is to support the district in aligning services and resources toward improvement, but some of the state funding allocations undermine that goal. Funding districts directly would enable them to determine which providers offer the best services suited for their needs, and would create an opportunity for districts to better consider their improvement systems and close outcome gaps.

Leverage the Power of Collaboration

The CCOEC provides an example of COEs leveraging their relationships and collective expertise to address issues of quality and consistency across the system. The AIR report provides some evidence that the COE self-assessment tool that the group developed has helped to spark further collaboration among counties that extended beyond the original six participating COEs: Following the tool's release, each COE in the state took the self-assessment, then met by region to rate their capacity for each of the eight state priorities identified in LCFF statute. An interview respondent described the nature of that conversation in one region:

What the tool allowed us to do with the region was think strategically through the lens of every state priority. Where did we have capacity within our region, and which county has that expertise? And where there was no expertise within the region, how might we move forward to address that? (p. 17)

Although anecdotal accounts of this process were promising, it is unclear how widespread this kind of positive experience was, or whether this kind of conversation is taking place on an ongoing basis. If COEs wish to partner on similar efforts, especially ones that involve an outside partner, the AIR report offers several considerations. Participants should establish clear expectations from the beginning. They need to take into account the COE fee-for-service model, which shapes the amount of time COE staff can dedicate to a collaborative effort. Involving districts in the process can help address the COE-district relationship that is instrumental to the success of the COE system. Leveraging the California County Superintendents Educational Services Association can help COEs and their partners take advantage of a well-established network of COEs—not only because it can help take new ideas to scale, but because it “demonstrates and understanding of and respect for an organization that the COEs view as important for their work” (p. 29) Finally, cross-county efforts should seek opportunities to promote continuous improvement at scale, addressing not just one-time efforts with high-capacity systems, but ongoing reflection and improvement in all counties.