



June 18, 2019

*Send via electronic mail and U.S. mail*

Jeff Harris, Superintendent  
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Re: Input on DNCUSD's Draft 2019-2020 LCAP

Dear Superintendent Harris and Assistant Superintendent Godla,

We write to submit comments on Del Norte County Unified School District's ("District") draft 2019-2020 Local Control Accountability Plan and Annual Update ("LCAP"), which we understand is on the agenda for discussion at the District School Board study session tomorrow at 5:30 p.m. We appreciate the collaborative spirit in which the District has worked with us over the past year to ensure robust community engagement and stakeholder input in the process of developing its LCAP and Annual Update. We submit this letter in that same spirit of collaboration to support the continuous improvement to the educational services and outcomes for our community youth, a goal we know the District shares with us.

#### **I. LCAP Stakeholder Engagement Process**

We greatly appreciate how the District has worked with us since our meeting in September 2018 to create strong and authentic community engagement in the development of the 2019-2020 LCAP. As noted in the draft LCAP and its attached "LCFF and LCAP Community Engagement Data Report, April 2019" ("April 2019 Data Report"), the District carried through on its commitments to hold six community input meetings and two student input sessions from October 2018 through April 2019 in Smith River, Klamath, and Crescent City. Partnering with the Building Healthy Communities Collaborative, True North Organizing Network, and the Yurok Tribe ensured greater participation from tribal and community members; and jointly facilitating those discussions created the opportunity for stakeholders to participate in a meaningful and informed way. As you likely know, we have held the District's model of LCAP stakeholder

engagement up as an example to other school districts in Northern California, and we commend these robust efforts. As we move into the next planning cycle for the 2020-2023 LCAP, we anticipate that the District will continue to build upon this collaborative effort and seek ways to deepen and improve consultation processes with all members of the community.

We have a recommendation for two improvements to future LCAP public hearings, based on our observations and experience from the June 6 public hearing. First, please post the draft LCAP at least three days in advance so that members of the public have enough time to read and understand the document. Unfortunately, because the 150-page draft LCAP was uploaded to the District website only one day before the public hearing, many people did not have enough time to read or absorb the information. We think three days is a reasonable amount of time to give community stakeholders the opportunity to review the draft LCAP, and is in keeping with the spirit of the Brown Act to allow sufficient time for the public to understand the School Board discussion and consideration of the document. Second, please place the LCAP agenda item earlier on the School Board agenda in future meetings so that greater numbers of school community members can hear and participate in the Board discussion. Although the meeting on June 6 began at 4:30 p.m., the LCAP agenda item was not addressed until 6 p.m., and the public comment period on the LCAP was opened nearly two hours later, at 7:45 p.m. Some of the parents of District students, who attended the Board meeting to provide input to the Board on the draft LCAP, had to leave before the comment period began; and unfortunately the Board and those parents lost a valuable chance to engage in productive dialogue.

## **II. Budgeted Expenditures of Supplemental and Concentration Funds**

As you know, the Local Control Funding Formula (“LCFF”) requires the District to increase and improve services for low-income, English Learner, and foster youth students (collectively, “high-need students”) in proportion to the supplemental and concentration (“S&C”) funds they generate for the District. This is core to the equity promise of LCFF. To this end, we appreciate that the District using base funds to pay for “deferred maintenance” this year, rather than using S&C funds for this action as it did previously.

The draft LCAP raises two major concerns for us related to the expenditure of S&C funds. We have two recommendations which, if adopted in the final 2019-2020 LCAP, would greatly strengthen the LCAP and—most importantly—clarify the District’s commitment to meet its obligation to use S&C funds to increase and improve services for our high-need students.

### **A. Hire more student counselors.**

Increased student access to counselors who have a Master’s in Family Therapy or Master’s in Social Work is an urgent need in the District, particularly for high-need students who have been traditionally underserved and consequently need greater educational support to achieve better outcomes. Since at least 2017, tribal and community members have consistently requested, in the strongest terms possible over multiple public meetings and joint letters, that the District use its S&C dollars to hire more student counselors. Most recently, as reflected in the April 2019

Data Report, the proposal to hire more counselors in the District received the second-highest level of support from community members who attended the six community input sessions from October 2018 through April 2019. Providing more counselors is essential to the success of the District's high-need students. The Adverse Childhood Experiences (ACEs) rate among District students is almost double the State average, as stated on page 7 of the draft LCAP. Moreover, significant numbers of parents/guardians and community members expressed that "having consistent and stable adults in their children's lives helped their students feel safe and connected at school," and "[f]amilies expressed a desire for more behavioral supports in schools." *April 2019 Data Report at 6*. During at least some of the community input sessions over the last several months, the District acknowledged this need and indicated a commitment to hire more student counselors.

If the District is serious about fulfilling its obligations under LCFF to be accountable to key stakeholders and increase equity for high-need students, then the District must invest in what the community prioritized for S&C expenditures and hire more student counselors. According to page 3 of the draft LCAP, the District has a surplus of \$204,757 in S&C funds that were unspent in the 2018-2019 school year. Although we understand that this amount may be reduced prior to closing the books for the year, even if it were reduced by 25%, that amount would be more than sufficient to hire at least one additional school counselor for District schools.

**B. Better demonstrate in the LCAP how significant districtwide spending of S&C funds on class size reduction, transportation, and site cleanliness staff will target schools serving predominantly high-need students.**

The District proposes to spend \$2,082,740 in S&C dollars on districtwide "K-12 class size reduction and combo class reduction," \$930,000 on districtwide school transportation services, and \$268,700 on districtwide site cleanliness and building maintenance services. *Draft LCAP at 69, 94, and 111*. Together, these three expenditures total \$3,281,440, or 57% of the District's total allocation of S&C funds for the 2019-2020 LCAP year. We understand that the District intends these expenditures to be principally directed towards, and effective in, meeting its goals for high-need students, as required by law. Cal. Educ. Code § 42238.07; 5 CCR 15496(b). But funding services for the entire school district with the hope that it will trickle down to students with the highest needs is not actually equitable. For example, Margaret Keating Elementary School has some of the highest rates of trauma in our community and therefore needs additional District services to achieve parity with other schools in the District. In addition, students who attend schools in more remote areas, like Mountain School, Smith River Elementary, and Margaret Keating have less access to medical, mental health, and social services than students who attend schools in Crescent City. This disparity in access to necessary services directly impacts their ability to succeed in school and requires a greater allocation of District funding to address these inequities. These sites are also limited in their ability to participate in community events and extracurricular activities that take place in town, thereby limiting students' abilities to connect with experiential learning and community building activities that students attending schools in town are able to more easily access. Transportation continues to be a main barrier

limiting these students from participating in activities and accessing basic services; and this is a major area of concern for providing equitable educational experiences for all District students.

In some sections of the LCAP where “class size reduction” is discussed, the District specifies that teaching staff will be added to Smith River, Margaret Keating, and Mountain through Title II funding. *Draft LCAP at 70*. But there is no similar explanation in the LCAP how the \$2 million in S&C funding for class size reduction will be principally directed towards, and effective in, meeting its goals for high-need students. For example, we expect that the District will hire additional teachers or staff at District schools with proportionally more high-need students, which is a legally sufficient justification. Instead, however, the LCAP has only general statements that districtwide spending on smaller class sizes funded by S&C dollars may benefit low-income and English Learner students. *Draft LCAP at 68, 121*. This must be clarified.

Similarly, the draft LCAP describes transportation services that will be paid for with nearly \$1 million in S&C dollars as “ensur[ing] that unduplicated students and their families are provided the support needed to get to school in a timely manner,” but does not tether those transportation services either to schools that have greater numbers of high-need students or to a statement about the actual numbers of high-need students in the District who require transportation to attend school or after-school activities. There are many activities and services that are only available to students in town, which means that the transportation needs of our high-need students outside of the Crescent City area are much greater. The justifications of S&C spending on transportation in the draft LCAP should reflect the District’s intention to prioritize transportation for those high-need students who live or attend schools in the more remote areas of the District.

Finally, the draft LCAP states that the District will use S&C funds “to assess site cleanliness and to implement a maintenance plan with continued funding of additional staff” to ensure safe and clean facilities “especially at schools serving predominantly low income and EL students,” but does not list those schools. Greater clarification and specificity on how these expenditures will benefit high-need students in particular, for example, by being principally directed to schools with greater numbers of high-need students, would significantly allay our concerns. This would also further the District’s commitment to increased transparency and accountability through the LCAP by allowing community and tribal leaders to understand how the District is planning to best serve our community and ensure that limited resources are truly being allocated in the most efficient and effective manner.

Students with the highest needs in the District can and must be prioritized to receive each of these districtwide services. In addition to clarifying how this will be done in the draft LCAP, we suggest that someone in the District who is involved in drafting and revising the LCAP on an annual basis (perhaps Assistant Superintendent Godla) coordinate implementation of the actions and services funded by S&C dollars to ensure the students with the greatest needs are getting first access to intervention services (including not only the services listed immediately above but also other services the District offers, such as after-school tutoring, counseling, or other intervention services). This would significantly address concerns we have about districtwide

expenditures in the draft LCAP of S&C funds on programs that will not apparently be principally directed or effective meeting the District's goals for its high-need students in particular.

### **III. Conclusion**

We look forward to continuing to collaborate with the District for strong and authentic community engagement in the development of the 2019-2020 LCAP and to make improvements to the LCAP to ensure high-need students receive the greatest benefit of the S&C funds that they generate for the District. To that end, we request a follow-up meeting on June 20 or June 24, after the June 19 study session and before the School Board votes on the LCAP, to discuss our concerns and recommendations.

Sincerely,



Jim McQuillen, MFT, PPS  
Education Director, Yurok Tribe



Terry Supahan  
Executive Director, True North Organizing Network



Linnea Nelson, ACLU Foundation of Northern California  
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