

CALIFORNIA SCHOOL BOARDS ASSOCIATION

Drowning in Documentation

*Toward More Effective and Manageable
Reporting for California Districts*

CONTENTS ▶

A Note from CSBA CEO & Executive
Director Vernon M. Billy, 1

Executive Summary, 2

Introduction, 4

Sprawling Requirements, 5

Redundancies and
Other Difficulties, 10

The Cumulative Impact, 14

Benefits Not Realized, 17

Opportunities and Obstacles, 18

Systemic Issues, 20

Recommendations, 24

Conclusion, 28



About

For this report, researchers spent several weeks researching program requirements on state and federal websites.

Researchers also interviewed 10 district personnel who are responsible for managing and/or submitting federal and state reports: two from micro-districts (enrollment 1-1,000), two from very small districts (1,000-2,500), four from small districts (2,500-20,000), two from medium districts (20,000-40,000), and one from a large district (40,000-100,000). Researchers also interviewed two county office of education administrators for their perspectives on what LEAs are experiencing and what role counties play in trying to assist LEAs. In addition, researchers conducted interviews with state-level personnel who have lengthy past or present experience working in the Legislature, California Department of Education, and the Department of Finance. These individuals' titles are listed only as "state-level insiders" or "state-level staffers" to preserve their anonymity. Some quotations from these interviews have been lightly edited for clarity or to keep the speaker's identity anonymous.

Contributors

Camille Esch	Kimberly Sellery
Andy Paul	Troy Flint
Mary Gardner Briggs	Kerry Macklin
Naomi Eason	Thairah Singharath
Erika Hoffman	

CSBA would also like to express its gratitude to interview participants, the CSBA Superintendents Advisory Council, and the Small School Districts Advisory Workgroup.



California School Boards Association
3251 Beacon Blvd., West Sacramento, CA 95691
(800) 266-3382 | www.csba.org



A Note from CSBA CEO & Executive Director Vernon M. Billy

Our schools are tasked with addressing a wide range of needs related to academic achievement and student well-being. Tracking and reporting progress are necessary components of measuring success in this critical work; yet when done excessively or indiscriminately, reporting systems can become counterproductive and undermine staff's ability to provide safe, healthy, and productive environments for students.

Increasingly, CSBA members have expressed that California's Byzantine reporting system is interfering with their capacity to focus on their core responsibilities, and often with little benefit in terms of accountability. This sentiment prompted CSBA's Research and Education Policy Development Department to investigate the issue and resulted in the May 2024 fact sheet, "[Drowning in Documentation](#)," which highlighted the growing number of state and federal reports, data submissions, and plans that local educational agencies must complete.

While accountability and transparency are vital to our public education system, "Drowning in Documentation" demonstrated that the sheer volume and ever-growing list of required reports is overwhelming school districts and county offices of education. Feedback from the field confirms that educators and administrators are increasingly torn between managing this paperwork and focusing on their primary obligations to students, staff, and communities.

As one step in a series of measures to address this problem, CSBA and the California Association of School Business Officials (CASBO) co-sponsored Senate Bill 1315 (Archuleta, D-Pico Rivera), legislation that requires the California Department of Education to document and report to the Legislature the number of state and federally mandated reports districts and COEs must submit. The goal is to identify where information could be consolidated and which reports could be eliminated — helping schools to free up more time and resources to provide for the needs of California's students. We are pleased to report that SB 1315 was signed by the Governor in September 2024.

To further support this effort, we are introducing *Drowning in Documentation: Toward More Effective and Manageable Reporting for California Districts*, a new companion report that examines the growing reporting burden and its impacts at the local level. For smaller districts, this issue is especially acute, pulling their limited number of staff away from serving students.

This report advocates for a more efficient system that prioritizes meaningful reporting while protecting the time needed to support student achievement. CSBA believes these changes will allow educators and administrators to focus on what matters most — students. We invite you to explore the report's findings and join CSBA in advocating for reforms that balance accountability with the need to enhance student learning.

Thank you for your continued dedication to education and all your work on behalf of California students.

Sincerely,

Vernon M. Billy

CEO & Executive Director, CSBA

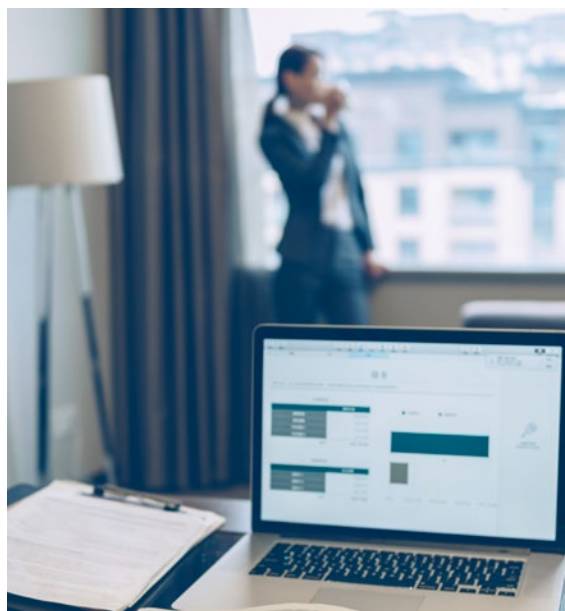
Executive Summary

California's local educational agencies (LEAs) are grappling with an overwhelming array of reporting requirements from both state and federal authorities. While these requirements serve important purposes, such as ensuring proper use of public funds, promoting transparency, and driving continuous improvement, the sheer volume and complexity of the requirements has become increasingly burdensome for LEAs.

These excessive reporting requirements have several negative impacts on LEAs. The steep costs in labor and time are particularly acute — a single new reporting requirement can generate thousands of hours of additional work annually across the state. The quality and value of reporting have also decreased as administrators struggle to meet constant deadlines, often leading to a compliance mentality rather than thoughtful planning and reflection. This diminishes the value of reporting and its intended purpose. Morale has suffered as administrators feel unsupported and question whether the data they submit is being effectively utilized. The burden is especially heavy for smaller districts with limited staff capacity, often limiting superintendents' time to focus on their core school leadership and improvement responsibilities.

Despite the well-intentioned goals behind many reporting requirements, such as promoting transparency and understanding the impact of state investments, the current system often fails to realize these benefits fully. While the state collects vast amounts of data, it unfortunately lacks the capacity and mechanisms to systematically analyze and act upon the information to address problems or drive improvements. The Local Control and Accountability Plan (LCAP), while designed to provide local accountability and drive thoughtful budgeting, often falls short of providing genuine transparency for parents, communities, and school boards due to its complexity and length.

While resources and support systems are available — such as training, guidance, and assistance from county offices of education and the California Department of Education (CDE) — many LEAs still struggle with the sheer volume of work compared to available staff time. Staffing shortages and legal limits on the number of administrators a school district can hire present additional difficulties.



Several systemic issues contribute to the growth of reporting mandates. First, there is a lack of comprehensive oversight at the state level, with no single entity monitoring the full array of LEA reporting requirements or having responsibility to keep it in check. Second, the initial simplicity of Local Control Funding Formula (LCFF) reporting has given way to detailed plans and reports for nearly every new categorical funding stream and has expanded the already onerous LCAP. This does not account for the numerous reporting and plan requirements for all of the categorical programs outside of the LCAP. Additionally, limited feedback loops between the state and LEAs exacerbate the issue.

This report includes recommendations for the Legislature, Administration, the State Board of Education, and state agencies to take a multifaceted approach to address these challenges:

1. Recommit to the logic of LCFF by:

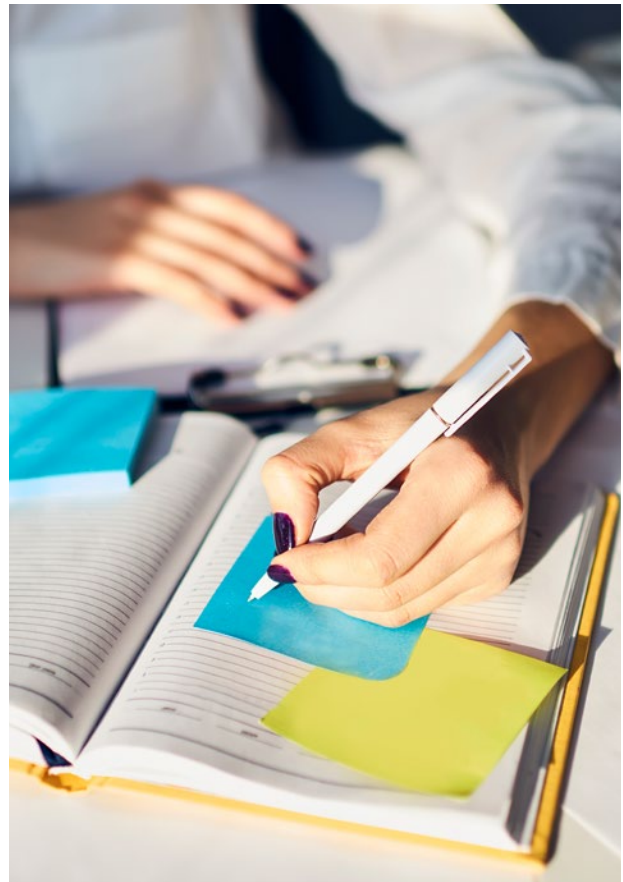
- › Reconsidering the use of categorical programs outside of the LCFF model.
- › Committing to a three-year goal of significantly reducing the number of data elements in the LCAP.

2. Reduce the reporting load by:

- › Conducting a comprehensive review of current requirements, aiming to reduce LEA time spent on reporting by at least 25 percent.
- › Prioritizing the removal of redundancies and data elements that are not actively used for decision-making.
- › Considering district size when determining reporting obligations, waiving certain requirements for districts with an enrollment under 1,000 students (referred to as “micro-districts” in this report), and developing shorter formats for small districts. Encourage succinct narratives in standalone reports that capture only essential information.
- › Better distinguishing and defining the purpose of the audit system versus expenditure reporting.

3. Increase support for LEAs by:

- › Shifting the data compilation burden to higher levels (county, state) and allowing greater investments in staffing and/or technology. Aim for the majority of districts’ time to be spent uploading data into existing systems, not repeatedly pulling data from local systems to populate individual reports. (This model has been effective in handling many federal reporting requirements.)
- › Investing in better tools and technology such as advanced programming that can assimilate data elements from various sources and forms. Additionally, develop portals that pre-populate with existing district data and provide drop-down options for short responses.
- › Developing sample content for required plans that LEAs can adapt or adopt.
- › Enabling very small districts to choose an intermediary, such as county offices of education or regional hubs, to write plans and reports on their behalf.



- › Normalizing and providing guidance for using artificial intelligence (AI) to generate content at the district level and harvest insights from data at the state level.

4. Develop better feedback loops between the state and LEAs by:

- › Establishing standing advisory groups that provide opportunities for end-users to weigh in on existing requirements and future changes.
- › Encouraging statewide organizations to compile annual lists of issues that could reduce administrative burden through statutory change.
- › Regularly analyzing State Board of Education waiver requests to identify common challenges and potential statutory fixes.



Introduction

California's local educational agencies (LEAs) face a daunting array of reporting requirements from both state and federal authorities. While these requirements serve important purposes, such as ensuring the proper use of public funds, promoting transparency, and driving continuous improvement, the sheer volume, redundancy, and complexity of these mandates have become increasingly burdensome for LEAs. Administrators find themselves devoting a significant portion of their time to compliance-related tasks, often at the expense of their core leadership responsibilities.

This report aims to shed light on the current state of reporting requirements for California's LEAs, the challenges they present, and the unintended consequences that arise from an overemphasis on reporting compliance. By examining the various sources of these requirements, their impact on LEAs, and the systemic issues that contribute to the problem, CSBA hopes to spark a conversation about how to strike a better balance between accountability and practicality. Ultimately, the goal is to identify strategies for streamlining reporting processes, reducing redundancy and duplication, and allowing educators to focus on what matters most: improving student outcomes.



“Districts are just drowning in plans, reporting, and tracking all the requirements. I don’t see a light at the end of the tunnel.”

— County office of education administrator

Sprawling Requirements

Each year, California’s LEAs dedicate an immense amount of time and resources to completing numerous plans, reports, and data submissions required by state and federal education laws (see csba.pub/LEAreporting).

Federal law

Federal law drives multiple annual data submissions regarding LEA expenditures under the Every Student Succeeds Act (ESSA) and other grant and formula-based programs. To fulfill federal reporting requirements, the California Department of Education (CDE) typically collects data from LEAs via various online portals and then compiles those data into reports for submission to the United States Department of Education. Generally, these data submissions require district-level data, but school-level data are increasingly also required. These data fulfill accountability requirements attached to various federal funding sources, including ESSA, special education funds issued through the Individuals with Disabilities Education Act (IDEA), child nutrition programs, and more.

Additional reporting is required for optional funds, including grant funds, that LEAs may receive for after-school programming or career technical education (CTE). LEAs identified as needing additional support and improvement also face supplemental reporting requirements.

State law

California law adds further requirements for planning, reporting, and data submissions. The Local Control Funding Formula (LCFF) of 2013 eliminated most categorical programs and introduced a new approach to program and fiscal accountability: the Local Control and Accountability Plan (LCAP). This comprehensive document requires a cycle of planning, community engagement, benchmark setting, measuring of progress toward goals, and updating of the plan. While the LCAP replaced many reporting requirements associated with

categorical programs, it introduced a very substantial workload that has increased over time.

The LCAP is layered on top of other accountability reports, including the School Plan for Student Achievement (SPSA), the School Accountability Report Card (SARC), and the California School Dashboard. Additionally, California requires districts to develop Comprehensive School Safety Plans for each school site,¹ a home-to-school transportation plan, and multiple other plans and reports for state funding streams that exist outside of the LCFF framework or have been added to LCFF since its inception. For districts that have applied for optional state grant programs, there are even more planning and reporting requirements.

The state’s auditing requirements introduce yet another layer of accountability reporting. All districts must hire an approved third-party auditor to review their financial statements and attendance counts and to verify whether the district has complied with numerous program requirements. All these requirements are outlined in the state’s annual audit guide, which has grown over time, but not in a consistent or thoughtful way. Some programs are subject to auditing, while other similar programs are not. Sometimes, the auditor verifies several requirements, and other times makes just a cursory assessment (e.g., whether the district submitted a required program report to CDE). Several respondents interviewed for this report pointed out that the audit requirements in many cases are duplicative of information they have already submitted as part of other expenditure reports.

¹ Districts with less than 2,500 enrollment may submit a single district-level plan.

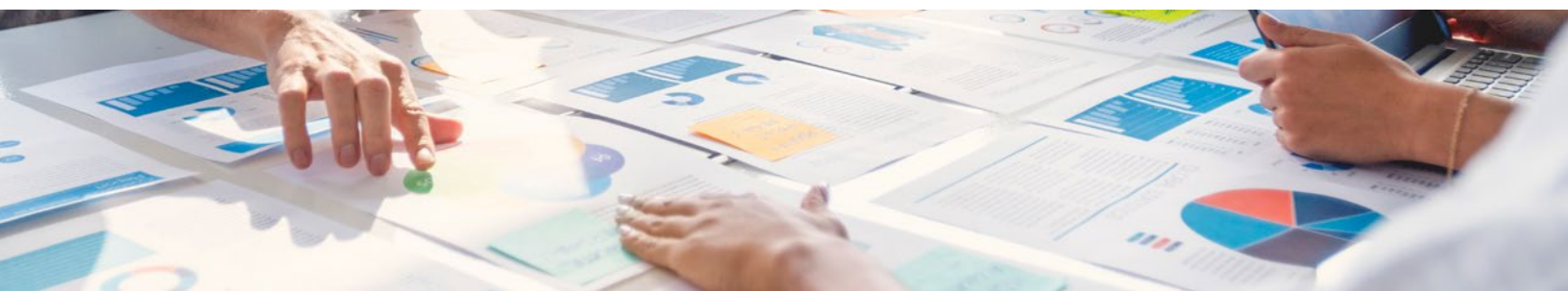
Required Plans and Reports

LEAs must submit plans and reports on a range of topics, including myriad additional plans and reports for any discretionary grants and programs.

CONTENT AREA	PLAN OR REPORT	
Accountability ONGOING Requires at least four plans, four annual reports and up to four additional plans for special circumstances.	B Local Control and Accountability Plan (LCAP) B School Plan for Student Achievement B School Accountability Report Card F LCAP Federal Addendum	F Local Education Agency Report Card S California School Dashboard — Local Indicators Report S Master Plan for the Education of English Learners
<i>Special accountability circumstances that require additional planning.</i>	F Comprehensive Support and Improvement F Targeted Support and Improvement	F Additional Targeted Support and Improvement B Differentiated Assistance
Safety and Transportation ONGOING Requires two plans, with updates as needed.	S Home to School Transportation Plan	S Comprehensive School Safety Plan (districts <2500 enrollment submit a district-level plan)
State Block Grants and Special Funds Requires at least five plans, three annual reports, three interannual reports and one annual certification.	S A-G Completion Improvement Grant Program Plan and Reports (two interannual reports) (thru 2026) S Arts, Music, and Instructional Materials Discretionary Block Grant Plan (2022–26) S Educator Effectiveness Fund Plan and Annual Reports (thru 2026)	S Expanded Learning Opportunities Program Plan (2021–27) S Literacy Coaches and Reading Specialists Funds Annual Reports (thru 2027) S Proposition 28: Arts and Music in Schools Plan, Annual Reports, Annual Certifications, 3-year Expenditure Reports (ongoing)

LEGEND: includes requirements originating at the

F federal level **S** state level **B** both state and federal level



Required Plans and Reports, continued

CONTENT AREA	PLAN OR REPORT
Special Education ONGOING Requires at least four plans, one annual report, ongoing maintenance of specified documents, and additional plans and reports for special circumstances.	B Special Education Local Plan Area (SELPA) Local Plan F Local Assistance Entitlements for Special Education Annual Report F Mental Health ADA Allocation Plan and maintenance of documentation F Special Education Federal Preschool Grant Plan and maintenance of documentation F Compliance and Improvement Monitoring (CIM) Plan F Comprehensive Coordinated Early Intervening Services Plan and quarterly reports (for special circumstances: LEAs showing disproportionality) F Expenditure reports for various Special Education Grants, including: F Supporting Inclusive Practices Grant S Family Empowerment Centers
Pandemic Recovery Requires at least two plans, six annual reports, 10 quarterly reports and one final report.	F ESSER I Annual Report (thru 2024) F GEER Annual Report (thru 2024) F Homeless Children & Youth Fund II Quarterly and Annual Reports (thru 2025) F ESSER II Annual Reports (thru 2025) F ESSER III Quarterly & Annual Reports (thru 2026) F Special Education Federal Preschool Grant/American Rescue Plan Act Plan and maintenance of documentation (thru 2026) S Learning Recovery Emergency Block Grant Annual Reports (thru 2029) S In-Person Instruction Grants Final Report (2024) B Expanded Learning Opportunities Grant Plan and Quarterly Expenditure Reports (thru 2026)
Discretionary Grants Requires variable number of plans/ reports, depending on what grants LEAs have received. Common examples are included to the right.	State examples: S Career Technical Education (CTE) Incentive Grant Program Evaluation & Plan S California Community Schools Partnership Program Plan & Annual Reports S After School Education & Safety Quarterly, Semi-annual, and Annual Reports Federal examples: F 21st Century Community Learning Centers Quarterly, Semi-annual and Annual Reports F After School Safety & Enrichment for Teens Quarterly, Semi-annual, and Annual Reports F Perkins CTE Completer Survey

LEGEND: includes requirements originating at the

F federal level **S** state level **B** both state and federal level

Required Data Submission or Compliance Activities

Additionally, LEAs must submit a range of data throughout the year. These data points reflect significant items that staff must submit on an ongoing basis.

CONTENT AREA	DATA SUBMISSION / COMPLIANCE ACTIVITY
California Longitudinal Pupil Achievement Data System (CALPADS) ONGOING Requires two data submissions per year.	Student data: B Enrollment, course enrollment, program participation B Demographics B Behavior and discipline incidents B Absences B Graduates, completions, dropouts B Homeless, English learner, special education status B and more
California Basic Educational Data System (CBEDS) ONGOING Requires annual data submission.	District- and school-level data: S Classified staff full time equivalency S Classified staff demographics S Estimated number of teacher hires S Work visa applications S Home-to-school transportation data S Kindergarten program type S School calendar information
California State Assignment Accountability System (CALSAAS) ONGOING Requires annual data submission.	Teacher/staff data: B Full time equivalency B Demographics B Assignments B Courses taught
Standardized Account Code Structure System (SACS) ONGOING Requires three data submissions per year and annual audits by an independent auditor.	Financial reporting: S District budget S Interim and year-end reports on financial and budgetary status S District income and expenditures by source of funds S Audit data

LEGEND: includes requirements originating at the

F federal level **S** state level **B** both state and federal level



Required Data Submission or Compliance Activities, continued

CONTENT AREA	DATA SUBMISSION / COMPLIANCE ACTIVITY
Principal Apportionment Data Collection System ONGOING Requires three data submissions per year.	<i>Data for calculating apportionments:</i> S Attendance S Some student data S Tax information
Child Nutrition Information Payment System (CNIPS) ONGOING Requires ongoing data entry.	<i>Participation and food counts for meal programs:</i> B National School Lunch Program B Fresh Fruit and Vegetable Program B School Breakfast Program B California Universal Meal Program B Meal Supplements/Snacks Program B Special Milk Program
Consolidated Application and Reporting System (CARS) ONGOING Requires two submission cycles per year, plus expenditure reports on one- to two-year timelines.	<i>For applying to and reporting participation in ESSA programs:</i> F Title I, Part A F Title III, Immigrant Student Program F Title I, Part D, Subpart 2 F Title IV, Part A, Student Support and Academic Enrichment F Title II, Part A, Supporting Effective Instruction F Title V, Part B, Rural Education Achievement F Title III, English Learner Student Subgrant
Federal Program Monitoring Reviews ONGOING Requires intensive review about every four years, consuming a 60-day period prior to review.	<i>Onsite and online legal compliance reviews for 19 federal programs, including:</i> F Career Technical Education F Student Support and Academic Enrichment F Compensatory Education F Supporting Effective Instruction F Homeless Education F Uniform Complaint Procedures F School Support and Improvement F and more F Title III, Immigrant Student Program
ESSA Per-Pupil Expenditures System ONGOING Requires annual data submission	F For reporting school-level expenditures by federal, state, local categories of funds.
Civil Rights Data Collection: School-Level Finance Survey ONGOING Requires annual data submission.	F For reporting more detailed data on school-level expenditures including on instruction, pupil support services, administration, salaries, books and more.
Federal Cash Management Data Collection ONGOING Requires quarterly data submissions.	F For reporting expenditures for formula-based federal programs

LEGEND: *includes requirements originating at the*

F federal level S state level B both state and federal level



“It causes anxiety that I’m going to miss a deadline. There’s a steady stream and all have slightly different requirements.”

— Small district superintendent

Redundancies and Other Difficulties

Redundancy across reports

District personnel consistently reported a significant overlap within the vast sets of required reports and data submissions. It makes sense, said one district program administrator, “because these things are created over time, and people are working in silos. When they ask for more data, they may not even know that something very similar already exists.”

In addition to reporting on the overall sense of redundancy and overlap, district staff shared reporting requirements they found particularly redundant:

- ▶ School Accountability Report Card (SARC) and the California School Dashboard
- ▶ The “LCAP and multiple other plans that require that same data”
- ▶ “School plans, safety plans, and SARCs at the school level”
- ▶ The “SARC has same info as SPSA [School Plan for Student Achievement] (except delayed) and pulls info from the safety plan.”
- ▶ “[Federal] Title II money and Educator Effectiveness grant”
- ▶ “[Federal] Title III money and Dual Language Immersion grant”
- ▶ “CALPADS and the CRDC [Civil Rights Data Collection] and then SARC”
- ▶ ESSA and SARC

These top-of-mind responses point to redundancies within the universe of state requirements — especially between SARC and other reports — as well as overlap between federal and state requirements.

In addition, LEAs experience several other reporting difficulties including:

Volume, timing, and frequency of reports

Many district personnel reported that their work lives revolve around submission deadlines. The sheer volume of reporting and the lack of alignment in their timing creates a never-ending cycle of moving from one report to the next. According to one superintendent in a very small district: “It causes anxiety that I’m going to miss a deadline. There’s a steady stream and all have slightly different requirements. Some need board approval, some don’t; some are annual, some are uploaded; some require county approval first. It can all be really confusing.” A director of business services in a different small district said: “Individually [these reports] might not be hugely time consuming, but there’s just so many of them. I think that’s what’s overwhelming. And just making sure you don’t miss any.”

One district coordinator of data and assessment had this plea: “Why do we have so many data pulls? Some of them overlap, some of them don’t. Why don’t you just create one report mechanism that schools and districts have to do? Even if it’s gigantic, we’d rather do one and get it over with, have one timeline that we’re adhering to, instead of all these moving targets.”

Moving between multiple disconnected and outdated data systems

One director of federal and state programs gave an example that illustrates the disconnect between state and local systems and the resulting “hours and hours and hours” of work:

There’s the [local system] where the IEPs [individualized education programs] live and then CALPADS in which you do the other reporting. They’re supposed to speak to one another, [but when we] submit data to the state, if there’s something wrong in one of the IEPs, like somebody didn’t certify something, somebody forgot to check a box, it will come back as an error for the whole group. Then we have to go back, fix the error, and resubmit the whole thing.

Making matters worse, “half the time the system crashes.” The shortcomings of existing data systems, the director said, add “dozens of extra hours” to the task.

District personnel report additional frustrations with state-level portals for categorical programs. Said a district data coordinator: “Sometimes the portals are working, and sometimes they’re not. And sometimes the data’s populated by the state, and sometimes it’s not.”

A state-level staffer explained why there has been a proliferation of portals that are not well integrated and sometimes lacking in quality:

With the increase in Prop 98 over the past several years... they created a bunch of one-time hodge-podge programs...and certainly [CDE doesn’t get] resources with those. [It leads to] dashing up quick portals and forms and things for reporting on each program.

Outdated and under-resourced local systems can also escalate both workload and frustration. One assistant superintendent of a very small district gave this example: “To see students who are both A-G completers and CTE completers, we have to manually go in and look at it, kid by kid. And we don’t have a district technician like larger districts do to go in and help with that.”

The problem, however, is not only limited to very small districts. An assistant superintendent of instruction in a medium-sized district voiced similar limitations in staff capacity:

Not all of our departments are really set up to have someone in them that understands data. So they’ll provide the data to my data team, and then we’ll look at it and realize that it’s wrong, and then we’ve got to go back and help them figure it out.



“I work with the superintendent to drop and pull data constantly. I’m keying things in; he’s rattling things off, typing away, pulling up other information. I’ve got two screens at my computer just so I can bring up all the information to work on at once. When did it become this way?”

— Director of business services in a micro-district of under 1,000 students, where she and the superintendent are the only staff available to complete reports.

Repetitive requests for information

Many standalone reports require LEAs to enter data points that are also reported in larger data submissions or in other reports. A superintendent-principal of a micro-district said: “So many reports ask for the same...data over and over again...We’ve already told the state this information, yet they have to put that field in every other plan...If I have to write the same information in another 20 plans, I’ll probably have a stroke before I retire.”

These insights explain *why* this happens: insufficient resources are put into data integration at the state level, so standalone reports proliferate, which each need some basic district and student data for context. As a result, money is saved at the state level, but the workload multiplies to over 1,000 districts across the state.

A related problem is when various reports and data submissions cover similar content but require the information to be packaged or coded in different ways. This common issue forces LEAs to slice and dice their financial and program data numerous times to convey essentially the same information.



Ever-changing requirements

District personnel report that changing requirements can be as difficult to implement as new requirements. A director of state and federal programs explained: “You get used to preparing the document in a specific way. And then when there’s a shift, then you have to go to the webinar to learn about it and work with [the county] to find out what exactly to do.”

A director of education services explained a similar aggravation — when requirements are uncertain for a period of time, they create obstacles and hold-ups at the local level. “The biggest frustration about that is [the attitude of], ‘Hey, work on this, but we’re gonna change the rules as we go because we don’t even really know what we want.’ So then you have to ask for clarification and they’re like, ‘Well, we’ll get back to you.’ And then a month or two later you get clarification.”

Developing narratives and plans from scratch

Written responses (as opposed to data points) can be equally onerous, if not more. “The Dashboard, for example, is a huge time drain — the narrative responses to everything,” said one superintendent-principal. One director of categorical programs said that sample responses could help with this issue: “I value the innovation and unique thoughts. But at some points, you really just need some samples of what the state’s asking you to do.”

Examples of best practices would also be beneficial for various plans that must be created from scratch. One assistant superintendent said she would specifically like examples for things such as improving literacy, supporting graduation rates, or targeting resources for long-term English learners. Adopting or adapting best practices is far easier than researching or developing your own.

Workload associated with authentic stakeholder engagement

Many funding sources, including LCFF, require engagement of various stakeholder groups such as parents, teachers, or community partners. Authentically engaging these education partners is critical for crafting local solutions that meet pressing needs. At the same time, the associated requirements can be very time-consuming and challenging to execute successfully, especially when they require LEAs to go beyond the LCAP advisory group and gather input from various community groups.

A director of state and federal programs in a small district reported the amount of labor required just to research and contact organizations to give feedback, especially when the LEA is asked to get feedback representing “any substantial group within your community.” In her district, she said, that “could be a Native American tribe. Or it could be United Way. [We are] just trying to find different organizations within our community to get feedback.” A superintendent in another district appreciated the intention but felt it was unrealistic given current staffing levels, especially in a very small district: “As these things are getting written, they’re good ideas. Like, ‘Oh yeah, they should be collaborating with all these different groups.’ But the amount of time that it takes to actually authentically go through and do that is not particularly feasible.”

Worthy goals

What factors contributed to the current overload of plans and reports? At the heart of this problem are good intentions, starting at the top. State lawmakers have many admirable reasons for establishing the required plans, reports, and data submissions, including:

- ▶ Ensuring proper use of public funds
- ▶ Preventing financial troubles for districts
- ▶ Promoting transparency to the community
- ▶ Driving continuous improvement processes
- ▶ Identifying inequities and areas needing attention
- ▶ Evaluating the impact of state investments

Ensuring proper use of public funds may be the primary motivating factor for elected leaders and, by extension, the people who try to influence them. As one insider said:

“The point is accountability. From the state, from the Legislature, from the administration, from the advocates, the question is: ‘All this money is going out — what’s gonna happen with that?’ We can’t just throw money out there. We gotta make sure people spend it correctly.”

District administrators interviewed for this report understand and agree that accountability and improvement are critical elements of school governance. A data and assessment coordinator said: “In terms of public accountability, the Dashboard and the LCAP are [useful]. We pull a lot of the Dashboard data into the LCAP and then talk about what we’re gonna do with it, which is great.” A superintendent in another district felt similarly about the LCAP and Dashboard because they lead the district to “do things we need to do in our school organizations anyway, to plan for outcomes and look at our data.”

The district staff interviewed for this report also generally appreciate the need for and value of accountability reporting. As one administrator said: “I know that all of these things have a very specific purpose and so it’s hard for me to say, ‘Get rid of things,’ because the intention behind all of it’s really good.” Still, staff also consistently expressed that the current system has simply become overwhelming.

“The currency here is being able to say you did something. [Legislators] do want to make California a better place. They want to represent their districts well. But because it’s very difficult to [make significant policy change], a lot of times it turns into ‘What’s something I can do that has the word[s] ‘domestic violence’ or ‘school safety’ or ‘financial literacy’ — whatever it is, right? Mental health, homelessness, foster kids.’ ...That’s where it starts. Having worked for lots of members, it starts with the members saying, ‘This year I really want to do something about financial literacy.’”

— State-level staffer





The Cumulative Impact

Compliance reporting consumes vast amounts of administrators' time, regardless of district size. In large districts, entire staff teams are employed in this work throughout the year. Mid-size and small districts have the same reporting requirements but a much smaller staff to handle the workload. A superintendent in a very small district explained: "I still have to do all the same things. I'm doing them at a smaller scale, and I have fewer students. But I still have to do all the reports, and I can't utilize those [large district] resources to help."

In California's micro-districts, (i.e., those with enrollment under 1,000 students), there is often no designated administrator to manage required reporting and data submissions, leaving the superintendent — or sometimes a superintendent-principal — to handle these tasks themselves. The burden placed on this single individual is immense, leaving little room for their core work of serving students and driving meaningful improvements in educational outcomes.

Steep costs in labor and time

Every change or addition made at the top of the system has an exponential ripple effect across the entire system, adding labor and costing time at every level. When the Legislature adds a new reporting requirement, CDE must develop a new process or portal to implement it, or in the best-case scenario, must find a way to add it to an existing report. Then CDE must design a training piece or written guidance for the new component and share with all LEAs. CDE may design frequently asked questions to clarify common misunderstandings, and still may continue to field questions and update the FAQs every year the new requirement is active.

Next, an LEA administrator in the central office must attend the training and learn the new procedure. They might then turn around and make an ask of several other people in the district, which could include the superintendent, district staff members, and/or principals. This will happen in approximately 1,000 LEAs across the state, ultimately involving thousands of individuals, or even tens of thousands. In many cases, additional labor time may be needed in the 58 county offices of education to support districts in meeting these requirements.

Decreased quality and value of reporting

LEAs' heavy workloads can often pull otherwise thoughtful leaders into a compliance mentality. The result is a sacrifice in both meaning and quality. When the primary goal in compiling reports is meeting constant submission deadlines, there is simply not enough time for thoughtful planning and reflection. As one district administrator explained about the LCAP specifically:

The intention behind the LCAP is great because you're trying to put attention on student groups that are underperforming, which we haven't done really intentionally in the past... The additional work that gets created is outrageous. If you're actually doing what is intended behind the plan, it is very time consuming. The requirement of having to do so many different things actually waters down the effort that's put into the documents.

This administrator continued, "If a principal is working on their safety plan and they actually read the questions and reflect upon the questions and do all the work involved, it's quite tedious. The reality is our principals kind of copy and paste from year to year because it's so time consuming. You can see evidence of three principals ago in some of the plans."

They conveyed a deep sense of frustration because administrators want to produce "actual authentic documents" that are thoughtful and meaningful. It's just not possible, they said. "I'm fighting against compliance versus meaning all the time." A superintendent-principal of a micro-district put it this way: "You end up in these fool's choices."

Pulling focus from core responsibilities

Multiple superintendents and associate/assistant superintendents interviewed for this report said they spend most of their time reporting rather than on their core responsibilities. One superintendent of a very small district described how much their districts' work is shaped — or, more accurately, warped — by compliance activities:

In reality, this [reporting] is the driver for all the work that happens in the central office. These are the essential dates on the calendar. These are the things that we're working towards. These are the things that we're planning board meetings around, for approvals to meet those deadlines. These are the things we're audited on. For the people in the central office, this is really our primary work... And because these deadlines are hard deadlines, and related to how we get funded... they're the things that take precedence over everything else. Our lives revolve around these reports and deadlines.

Reporting directly impacts district leaders' ability to do what's most important to them, such as getting out to school sites, or focusing on supporting and supervising staff. Said one assistant superintendent of instruction: "I would say I'm hardly even at schools anymore, and that used to be my primary job — to go out and talk to staff, see how things are going, and what can we do to help." They said federal program monitoring and equity reviews had particularly contributed to the problem this year.

A county office of education administrator said this of the LCAP in particular:

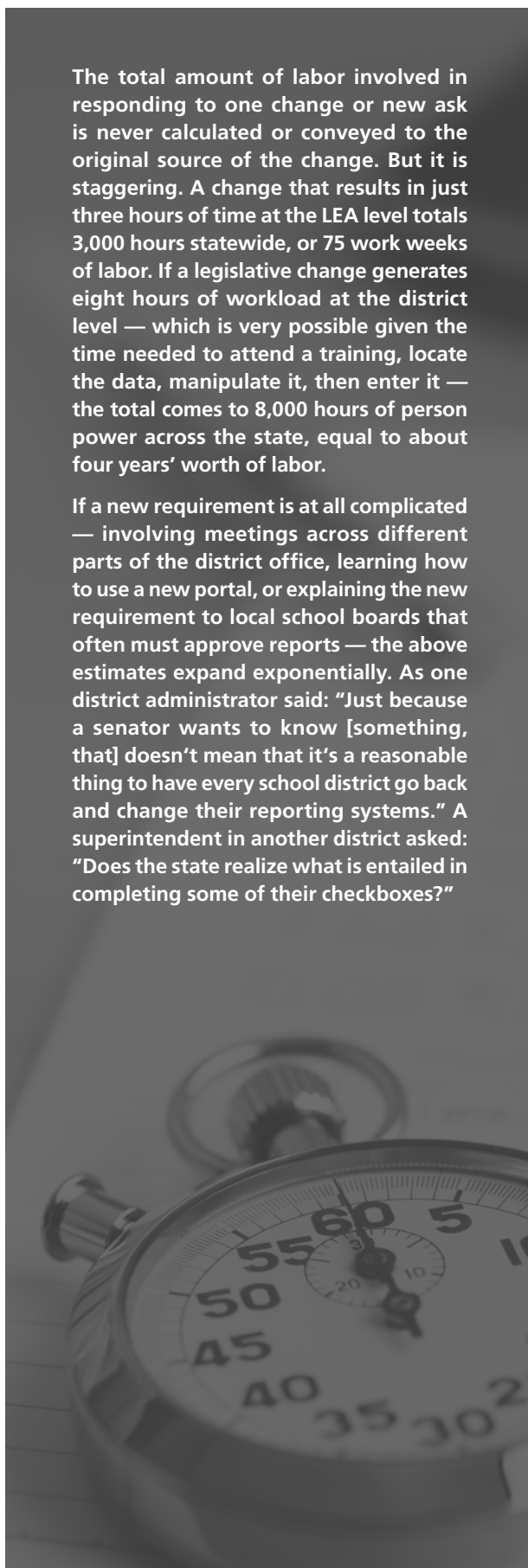
It really feels like districts are spending all this time writing the plan and not doing the actual work of *implementing* the plan. Districts have definitely added staff to write plans, but are they getting to the work of putting them in place?

A director of business services summed it up this way:

All these reports, what's so frustrating, is that it feels like they keep us from doing what we really should be doing and impacting students' lives.

The total amount of labor involved in responding to one change or new ask is never calculated or conveyed to the original source of the change. But it is staggering. A change that results in just three hours of time at the LEA level totals 3,000 hours statewide, or 75 work weeks of labor. If a legislative change generates eight hours of workload at the district level — which is very possible given the time needed to attend a training, locate the data, manipulate it, then enter it — the total comes to 8,000 hours of person power across the state, equal to about four years' worth of labor.

If a new requirement is at all complicated — involving meetings across different parts of the district office, learning how to use a new portal, or explaining the new requirement to local school boards that often must approve reports — the above estimates expand exponentially. As one district administrator said: "Just because a senator wants to know [something, that] doesn't mean that it's a reasonable thing to have every school district go back and change their reporting systems." A superintendent in another district asked: "Does the state realize what is entailed in completing some of their checkboxes?"



Impact on morale

Many of the individuals involved in district reporting said they did not feel supported by the state, or that they are valued members of California's education system.

Many also voiced a demoralizing perception that the data they submit is not actually used — or even read — at the state level. Said one respondent: "What are the reports being used for, if anything?" Said another: "We never get feedback on the plans. I write them and they go off into the nether world. So, if they're so important, who's reading them and what are they doing with them?" This perception was heard even at the county level: "What actually happens with all of this information?" said one administrator who assists districts with accountability reporting. "Who ultimately gets this data and cares about it? We never get an indication that it's being read. I think it's legislators who want the info, but I don't even see them looking at it."

These perceptions are particularly frustrating to the many educators and administrators who have high standards for themselves. Morale suffers when they feel they can't possibly complete all their work at a high level. As one superintendent said: "School people don't like to cut corners — people take this seriously." An administrator from another district put it this way: "School people want to do a good job and get an A. They want to do right by kids."

The excessive workload also undermines administrators within their own districts. Teachers and classified staff sometimes don't fully grasp the volume of administrator workload and may view administrators as disconnected from the core work of teaching and learning. As one superintendent explained: "There's been a lot of questioning... like, 'What do district offices even do?'" No one outside of the central office can see the volume of reports and requirements, all with firm deadlines. Naturally they are frustrated, the administrator said, because of all these compliance activities: "They don't get support from us that they need."

“They’ve taken leadership out of the equation and made us administrators. All we do is write plans.”

— Superintendent



“I just feel like I’m really fighting to make things meaningful in the LCAP, rather than it lending itself to being meaningful.”

— Director of federal and state programs

Benefits Not Realized

Lots of data, questionable returns

By all accounts, the state has been successful in ensuring that public funds are spent legally and districts do not experience catastrophic financial failure. These are the notable successes of California’s current reporting system. However, other goals, such as transparency to parents and the community or understanding the quality or impact of specific state investments, are not being met.

While the collection of data enables the state to achieve some of these goals, the state lacks the capacity and mechanisms to systematically analyze all the data that are submitted, let alone act to address any inequities or other problems that surface in such an analysis. District personnel are keenly aware of this gap between intent and execution, and often feel as though they are the ones who are caught in the middle, collecting and reporting reams of data that will never be used to actually *improve* the education system. One administrator gave the example of the Civil Rights Data Collection (CRDC): “I think that it’s used mostly for research... So we’re doing all of this, [but] schools and districts don’t use it to help create change or move the needle on how we are addressing our current local needs. CRDC is very frustrating.”

Certainly, there are some useful evaluation efforts: a program office in CDE might consult their data and use it to refine the program or an outside research entity might conduct an in-depth analysis of a specific program utilizing data collected by the state. While these efforts are valuable, they are not consistent or frequent enough to justify the massive time investment required from people in every district across the state, year after year. By and large, fewer data points put to greater use would provide much more value to the education system, according to district personnel.

LCAP missing the mark on some key objectives

Among the individuals interviewed for this report, the LCAP was the most frequently mentioned example of reporting excess. Several voiced concerns that it fails to provide genuine

transparency for parents, communities, and even school boards, as it has become too complex and lengthy. The following is just a small sampling of their comments:

“The way it is now, there’s no way parents are gonna read this thing and understand any of it.”

“It’s supposed to be this tool to be transparent with the community, [but] it makes it less transparent when you have to weed through all of the junk in it.”

“It’s this thing that is so huge, ever changing and all encompassing. My community doesn’t read it. It’s 65 pages of gobbledy-gook for my community.”

According to many district administrators, the LCAP is also not fully realizing its purpose as a driver of thoughtful local planning and budgeting. “LCAP should be a plan we can use for *our* purposes — to identify our problem areas and say this is what we’re doing,” said a district business manager.

However, the LCAP’s requirements have become so extensive and restrictive that there is not enough room for authentic strategic planning. Instead, districts are just focused on getting it done.

One county administrator said: “There is a checklist for counties to use when reviewing district’s LCAPs, and the checklist alone is 10 pages long! It just makes it clear that we’ve missed the point of improving student outcomes and telling the public what we’re doing. It is a long, onerous document. I just don’t see it helping.” Administrators would far prefer to focus on fewer goals and do a better job of achieving them.



Opportunities and Obstacles

Available resources and support systems

Districts have access to resources to help with their reporting workload. According to those interviewed for this report:

- ▶ CDE provides numerous online trainings and webinars, and LEAs can email or call program offices to answer specific questions.
- ▶ The state's Fiscal Crisis Management and Assistance Team (FCMAT) offers support and resources.
- ▶ Professional associations such as the California County Superintendents association, especially the Business and Administration Steering Committee (BASC), and the California Association of School Business Officials (CASBO), provide guidance and support.
- ▶ County offices of education offer a range of supports that vary by office. Several publish lists of requirements with due dates and send out reminders and timely advice through listservs. Some have more extensive offerings, from dedicated office hours to one-on-one coaching to help administrators in small districts complete forms.
- ▶ Private consultants or firms are an option for some districts as a source of technical assistance.

These supports, while critically important and necessary, are sometimes not enough to overcome the core challenge of too much work for too few people. Those who are providing the support are keenly aware of these limitations and are often at a loss for how to help, particularly with small, overwhelmed districts. One county administrator explained:

We feel like we're beating our heads against the wall. We've tried a lot of things to help districts: Zoom calls before reporting periods, office hours. They all have our cell phone numbers. [But] what we hear from them is, 'I can't focus in my district because I'm pulled in so many directions.' So we will set up a quiet conference room here in our office so they can get away from their site and focus to get these reports done. And we [in business services] will sit

there with them, all day, to walk them through it, help them. They'll sign up and say they'll be there and then cancel at the last minute because something is going on and they just can't get away from their sites... It's really difficult to figure out how to help them.

Staffing challenges make matters worse

One of the largest obstacles for LEAs is that California state law caps the number of administrators a school district may hire, based on enrollment. Under current law, the maximum ratio of administrative employees allowed per 100 teachers is eight for unified school districts, nine for elementary districts, and seven for high school districts.² Given that 59 percent of school districts serve fewer than 2,500 students, these hiring restrictions frequently create instances where superintendents must play multiple roles: superintendent, principal, chief business officer, facilities director, special education director, transportation director, and staff to the board. Forcing the superintendent to perform so many different specialized roles hampers performance in these areas and prevents them from focusing on what should be their core responsibilities: student academic achievement and social development. As a result, small school districts are particularly challenged in their efforts to serve students at full capacity.

Another widespread constraint is the lack of qualified administrators, particularly with fiscal/business experience. School finance is a specialized field requiring knowledge and skills not found in other sectors. When an experienced administrator leaves, it is hard to find an equally qualified replacement, so districts often must hire a person who is new to the specifics and the learning curve can be very steep. One director of state and federal programs estimated that it took them a full two-and-a-half years to learn their job and said: "The first year... I didn't even know what I didn't know. I went to this training and was like, 'I have no idea what they're saying.'"

The pandemic compounded these challenges and has led to lasting changes. Many district administrators who played a role in meeting reporting obligations have left, and there has not been an adequate supply of replacements. One county fiscal administrator said:

There were a couple of years there where we'd put out an open position and we'd be lucky if we got one or two applicants, and they wouldn't meet the minimum requirements. We ended up bringing on a temp firm to supply us with temps. We still have temps working now, doing the less sophisticated stuff, but the high-level positions are the ones that are now vacant.

The pandemic also led to substantial one-time federal funds, which came with equally substantial new reporting requirements. "All that pandemic money was coming at a time when folks were understaffed," said a county-level fiscal administrator.

Even if there were qualified applicants, said another county-level administrator, it really doesn't make sense to make new hires using one-time money: "Reporting has gone way up but I haven't seen business offices add any people, period. Business office people are very pragmatic."

"That's our biggest challenge now, finding people who have the qualifications for this kind of work."

— County office of education fiscal administrator

² Education Code 41402. "Administrative employee" means an employee of a school district, employed in a position requiring certification qualifications, who does not come within the definition of a "pupil services employee" or a "teacher."



Systemic Issues

Several systemic factors are driving the excess of reporting requirements for both LEAs and state agencies. The following drivers and structural deficiencies have led to a system that continues to swell and become increasingly out of balance, year after year:

No individual or entity at the state level sees the entire array of requirements

The background research for this brief revealed just how fragmented and unconnected these many requirements are — across the Education Code, state agencies, and divisions within agencies. In outreach for this research, no one at the state level could produce a comprehensive listing of reporting requirements. As one state-level insider explained:

We don't do a good job putting our hands around all the reports and put them in a centralized place for LEAs. Because things are coming at different points in time [and] have different requirements. We work very siloed, to be honest with you.

There have been a few scattered efforts to list all LEA requirements as an aid to districts — some counties have done it, and other organizations like the California County Superintendents BASC [Business and Administration Services Committee] or private consultants may have done so as well. In this research, CSBA compiled the list found on pages 5-8 of this report. However, none of these efforts reflect a state-level awareness of the totality of requirements.

No one is accountable for evaluating requirements

There is no state entity charged with ensuring that LEA requirements are reasonable and manageable. Although CDE might be able to streamline the way in which data and reports are submitted or offer more guidance to LEAs, it doesn't have the authority to eliminate any requirements. For requirements established in state statute, only the Legislature (together

with the Governor) can change the law, but these parties do not have full visibility of the problem or enough contact with LEAs to understand the need for reduction. Not only is it difficult to spot redundancies, parties lack motivation to remove reporting requirements because removing data associated with accountability is unpopular. As a result, requirements and redundancies continue to stack up. Without new funds to hire more staff, districts have little choice but to absorb the cumulative workload and spread it across existing employees.

Adding data requirements is an easy win

Real education reform is very difficult to conceptualize and execute, is very expensive, and requires a long time commitment. In contrast, it takes relatively little effort to add a new data element, require a new report, or attach a planning requirement to a new investment (even a comparatively minor one). Elected leaders and advocates can point to these kinds of changes as evidence of action and progress, achieving wins for their constituencies or funders. One state insider explained:

To get something through that requires a lot of money or [involves] a big policy change that might have opposition... there are so many barriers [to that], so then [legislators] start to hone it smaller and smaller, down to, 'Okay, what *can* we do?' And then it might turn into, 'Well, maybe we don't really have enough information about something, or it's not posted somewhere, or parents don't know about this.' Or maybe they don't even know if parents know about that.

Even if nothing ever changes, lawmakers can point to these requirements as necessary first steps. Adding reporting requirements is a symbolic way to show a commitment to accountability, transparency, and promote equity. Unfortunately, the opposite action — removing requirements — is unpopular, even if it would have no true impact on the quality or equity of education that students are receiving.

One superintendent lamented:

I know it's a hard chore for people who are elected into office for short terms, but someone needs to go through ed code. No one wants to take anything out because they're afraid of taking things out. Cleaning it up would be helpful because I'm not sure anyone even knows or cares about some of these things, like the SPSA."

Polymakers have seemingly abandoned the logic of LCFF

When it was adopted in 2013, the Local Control Funding Formula (LCFF) represented a seismic shift in California's approach to school finance and governance. In lieu of byzantine layers of categorical programs — each with their own requirements for use — that limited LEAs' ability to allocate resources, LCFF distributed funding through a per-pupil base grant, along with supplemental and concentration grants to target additional resources for student support. In return for flexibility and local authority, LEAs must submit LCAPs and report annual performance on an array of eight state priorities through the California School Dashboard.

Over time, lawmakers have complicated LCFF by adding numerous new categorical funding streams that have their own standalone planning and reporting requirements. Given that few of today's legislators were in office when LCFF was established, they had the difficult role of stepping into a major shift in school fiscal policy without the benefit of participating in the original debate and decision-making process. As a result of new reporting requirements, districts now must produce detailed reports for nearly every new funding stream *and* the onerous LCAP, creating a "worst of both worlds" effect.

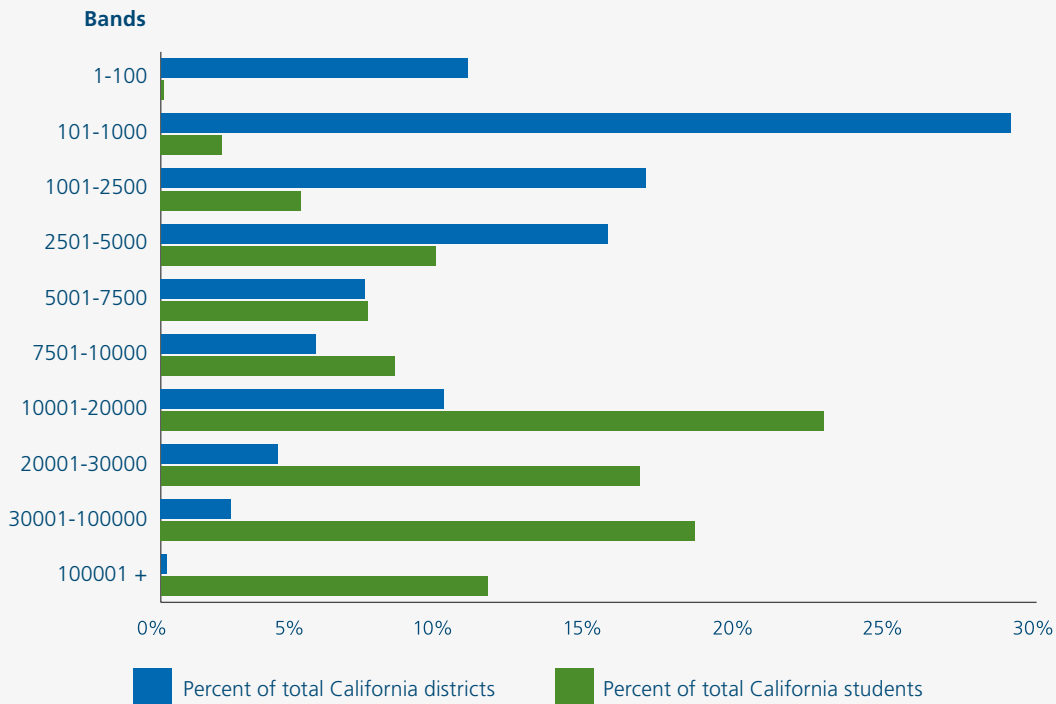
As one county office administrator said: "The whole local control concept is that districts know best what their students need. But there are so many extra layers of accountability that have been added to it to prove it and track it." Respondents at every level admitted that they are somewhat relieved that federal and state one-time funds are now drying up because it will at least stem the tide of associated requirements.

"It used to be a real mess and it got better, but now it feels like it's getting worse. So much got cleaned up with LCFF. That consolidation was a big deal. [But] the natural tendency, the gravity, is all pulling toward making things more complex. ... We need an LCFF Defense Force. It would have to be labor and management and equity all coming together and saying, 'This is too much. It's too much.'"

— State-level insider

Figure 1: Enrollment in districts by band

Note: "Band" here refers to range of enrollment.



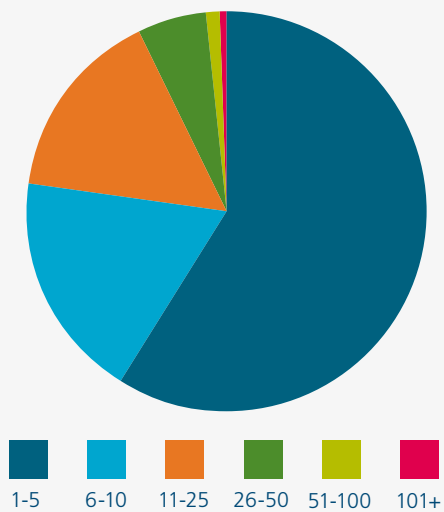
One-size-fits-all requirements

Districts vary radically in enrollment and number of schools replace with (see Figures 1 and 2), and by extension, the number of administrators available to produce all the plans, reports, and data submissions required of LEAs. Yet, districts are treated nearly identically when it comes to state and federal reporting. This presents problems both for the smallest and largest districts. An executive officer of state and federal programs for a large district said: "There's over a hundred people in the district who touch the LCAP. Literally over a hundred people. It's a big, big lift." At the same time, a superintendent-principal explained the conundrum in their micro-district with eight classroom teachers: "We don't have 30 people to run LCAP. Right? But I still have the same requirements as LAUSD! Who does the plans for our district? I don't have anyone else, so my teachers and I do everything."

LEA size varies substantially

Figure 1 demonstrates that most school districts in California have under 2,500 students. Fifty-six percent of school districts in California serve 7 percent of the state's student population. At the same time, 66 districts out of 992 (7 percent) serve 46 percent of California students. Figure 2 further illustrates that the majority of districts operate five or fewer schools.

Figure 2: District size by number of schools



Few feedback loops between different levels of the system

State-level decision-makers do not have full visibility into the cumulative burden on LEAs. As one state-level insider said: “We don’t have a robust feedback loop from the field.” This is an area where statewide associations may provide leadership, and the CDE could further provide feedback opportunities for LEAs about the holistic impact of reporting requirements.

Meanwhile, LEA personnel expressed frustration that policy-makers don’t have the kind of practical experience that would help attune them to districts’ needs and challenges: “They don’t have people who have been part of a school system recently making these decisions,” said one. Often district staff are in the best position to see if a certain report isn’t capturing much substance or meeting its intended purpose, but they have no obvious way to offer feedback or influence change.

Just as information about the reporting process is not traveling upward from districts to the state level, it is also not flowing downward. LEAs do not often receive clear messages about the purpose of so many reports and how the information is used. Said one district administrator of ESSA reporting in particular: “I’m convinced that nobody looks at it, and it’s completely worthless. Maybe if I understood more the need for it and the usefulness, I would have a better attitude.”





Recommendations

Recommit to the logic of the LCFF model

- ▶ The Legislature and Governor's Administration should reconsider the use of categorical programs outside of LCFF.
 - › If one-time funds become available, the Legislature and Administration should consider consolidating them into discretionary block grants rather than restricted categorical programs with reporting requirements.
 - › If the state finds it necessary to specify what one-time funds are used for or to establish a new categorical program, it should rely more on upfront assurances and audits for accountability rather than requiring new plans and standalone reports.
- ▶ The Legislature and Administration should commit to a three-year goal of significantly streamlining and reducing the number of data elements in the LCAP. This was a universal request from the district representatives we interviewed for this report, and several other reports have made similar observations or recommendations.

Reduce the load

With the enactment of SB 1315 (Chapter 468/Statutes of 2024), CDE will begin the review process for the number and types of reports that LEAs are required to submit. The review will identify the type and purpose of each report and how it is currently being used. Additionally, CDE will make recommendations about which reports can be truncated, consolidated, or eliminated. This will be a solid first step in reducing the reporting load for LEAs.

CSBA recommends that CDE, in collaboration with the State Board of Education, conduct a comprehensive review of current reporting requirements with the aim of reducing time spent by LEAs on reporting by at least 25 percent.

- ▶ CDE, in collaboration with the State Board of Education, must conduct a comprehensive review of current reporting requirements with the aim of reducing time spent by LEAs on reporting by at least 25 percent.

Reduce the load (continued)

- ▶ Priorities for removal should include any identified redundancies as well as data elements that aren't being analyzed and actively used for decision-making on a systematic basis.
- ▶ As part of this review, the state should also consult with district personnel to identify the most complicated and onerous tasks to find opportunities for reducing administrative burden.
- ▶ When reviewing proposed legislation or policy, policymakers must be clear about the intended purpose of any reporting requirements and consider whether existing data or reports might be used to meet those goals.
 - ▶ If a bill in the Legislature proposes a new reporting requirement, legislators should affirm that no other existing reports or data submissions collect the same or similar data.
- ▶ CDE and the State Board should review and develop a plan for addressing the two most-cited redundancies in this report: overlaps between federal and state requirements and overlaps between SARC and other accountability reports.
- ▶ Requirements must consider what districts of different sizes can reasonably handle, waiving certain reporting requirements altogether for micro-districts and developing shorter/less detailed reporting formats for small districts with limited staff capacity. A helpful example is the current statutory waiver of school-level safety plans for districts with fewer than 2,500 students — these districts may submit a consolidated district-level report instead.
- ▶ The State Board should make it clear to LEAs that report narratives should be as succinct as possible, capturing only essential information. For competitive grants that require an application and plan, state agencies should assign extra points for brevity to reinforce the idea systemwide that quality is more important than quantity.
- ▶ The Legislature, Administration, and state agencies need to better distinguish and define the purpose of the audit system versus expenditure reporting, minimize the number of programs that are subject to both, and standardize audit requirements across programs to achieve greater consistency and logic.



Increase support

- ▶ Wherever possible, CDE should aim to shift the burden of compiling data up to higher levels (county, state), and make greater investments in staffing and/or technology. As the state education agency, CDE is responsible for collecting data from LEAs through regular data submissions and aggregating into statewide reports that are submitted to the federal government. CDE could play the same role for any state-required reporting, so that most districts' time is spent uploading data into existing systems, not pulling together local data repeatedly to populate individual reports.
- ▶ The state should invest in better tools (and training) that can streamline reporting at the LEA level, such as forms and templates that pre-populate with existing district data, drop-down options for short responses, or advanced programming that can assimilate data elements from various sources.
- ▶ For any required plan (including LCAP), CDE should develop and make available sample content that can be adapted by LEAs to be district specific. In lieu of requiring narratives in plans, CDE should provide LEAs with a simple option to assure that funding will be spent in alignment with program rules and goals.
- ▶ Additionally, drop-down options would be helpful to lighten the load of districts having to craft new narrative text and manually key in all responses. These ideas could preserve program accountability while keeping LEAs from the time-intensive task of developing new ideas and plans from scratch.
- ▶ CDE should consider regional options to enable very small districts to choose an intermediary to write plans and reports on their behalf. Such options may include county offices of education or a regional hub. This would free up much-needed time for superintendents who have few or no district staff members and must do it all themselves or rely on teachers. For districts that choose their county office, the state could devise a policy solution to maintain the COEs' accountability role while it provides writing support, such as having separate divisions within the COE handle these tasks separately.
- ▶ CDE should normalize and provide guidance for using artificial intelligence (AI) for generating the narrative content of plans and reports at the district level and for harvesting insights from the data at the state level.
- ▶ The state should explore and invest in technologies that can be used by LEAs to assist with stakeholder engagement, such as surveys pushed to parents and students via text and AI to consolidate the data and identify key insights.



Develop better feedback loops

- ▶ State agencies should have standing advisory groups to provide opportunities for end-users to provide feedback on existing reporting requirements and weigh in on any future additions or changes.
- ▶ Statewide organizations and local coalitions should annually compile lists of issues that could be improved with statutory change and provide this information to the Legislature, the Administration, and state agencies, apart from big-picture priorities.
- ▶ The State Board of Education and CDE should regularly analyze waiver requests to identify common issues that are generating extra work for districts that could be addressed through regulatory or statutory changes.



Conclusion

Planning and reporting activities play an important role in our education system. However, the current system has become overwhelmed with requirements that exceed the capacity of district personnel and undermine the reporting's utility. By streamlining requirements for all LEAs and differentiating for smaller districts, the state can maintain fiscal responsibility and transparency while allowing educators to improve student outcomes.

Establishing a proper balance will require a multifaceted approach: legislative and regulatory standards for new mandates, stronger advocacy, developing better feedback loops, investments in technology, and a return to the spirit of the Local Control Funding Formula. It will also require a return to trust — in districts, in the logic of LCFF, and in other existing systems that help ensure accountability of the public school system, such as auditing, accreditation, county oversight, and local board governance.

If California can lean more on those systems and prioritize the most essential data points for LEA reporting, we can uphold public accountability while empowering local leaders. By recalibrating the balance between compliance and leadership, California can free up its education system to adapt, innovate, and deliver transformative results for the next generation.