

Date of Hearing: June 12, 2024

ASSEMBLY COMMITTEE ON EDUCATION
Al Muratsuchi, Chair
SB 1315 (Archuleta) – As Amended April 18, 2024

SENATE VOTE: 37-0

SUBJECT: School accountability: local educational agencies: annual reporting requirements

SUMMARY: Requires the California Department of Education (CDE) to, on or before March 1, 2025, and every two years thereafter, provide a report to the Superintendent of Public Instruction (SPI) the Governor, and the Legislature on the number and types of reports that local educational agencies (LEAs) are required to annually submit. Specifically, **this bill:**

- 1) Requires the CDE to, on or before March 1, 2025, and every two years thereafter, provide a report to the SPI the Governor, and the Legislature on the number and types of reports that LEAs are required to annually submit.
- 2) Requires the report to include all of the following:
 - a) Information on each type of report, including if the report is required by a particular program;
 - b) The purpose of each report;
 - c) Recommendations for which reports can be consolidated to reduce the total number of reports LEAs are required to annually complete; and
 - d) LEA administrative costs for completing each report, including, but not limited to, necessary staffing.
- 3) Requires the CDE, in determining administrative costs, to seek voluntary input from varying sizes and types of LEAs.
- 4) Requires that this report required be submitted in compliance with Section 9795 of the Government Code.
- 5) Encourages the Assembly Committee on Budget, the Senate Committee on Budget and Fiscal Review, and any other relevant subcommittees, within 30 days of receiving the report to hold a hearing to allow the SPI to present the report.
- 6) Defines, for purposes of the act, a “local educational agency” to mean a school district, county office of education (COE), or charter school.

EXISTING LAW:

- 1) Requires LEAs to submit numerous reports to the CDE on an annual basis. (Education Code (EC))

- 2) Requires any bill that would require a state agency to submit a report to the Legislature to include a provision that repeals the reporting requirement, or makes the requirement inoperative, no later than a date four years following the date upon which the bill becomes operative, or four years after the due date of any report required every four or more years. (Government Code (GOV) 10231.5)
- 3) Requires the Legislative Counsel, in drafting a bill that would impose a reporting requirement to include a provision that repeals the reporting requirement, or makes the reporting requirement inoperative, four years after the date on which the requirement becomes operative, unless the person requesting the bill or amendment directs the Legislative Counsel to do otherwise. (GOV 10231.5)

FISCAL EFFECT: According to the Senate Appropriations Committee:

- The CDE estimates General Fund costs of \$345,000 each year and 3.0 positions to comply with the bill’s new data collection and reporting requirements. This estimate includes the cost of a new data reporting system that would need to be created that would be flexible to adapt to changes in collections from year to year.
- While not explicitly required, LEAs may incur additional, unknown cost pressures to track and report their “administrative costs” associated with completing each annual report and provide that information to the CDE. However, the language as currently drafted lacks clarity, therefore the extent of the costs would depend on how the process for collecting and providing the data to CDE is implemented.

COMMENTS:

Need for the bill. The author states, “With the state facing a record deficit, it is vital for California to provide oversight on prior legislation to ensure taxpayer dollars are being used responsibly. School districts throughout the state are required to annually produce 170 reports, nearly equivalent to the statutorily required 180 instructional days in the school year. Although beneficial from an informational standpoint, the sheer number of reports can be suffocating for school districts and detracts from their ability to meet the educational needs of students. SB 1315 will help alleviate the administrative costs and burdens placed on school districts – especially important at a time when they are working hard to emerge and recover from the impacts of the pandemic.”

The Plandemic: Reporting requirements increase as new programs and initiatives proliferate during the COVID-19 pandemic. The Local Control Funding Formula (LCFF), enacted in 2013, eliminated most categorical programs and their associated applications, plans, reports, data submissions, and compliance monitoring.

Since then, and particularly during the COVID-19 pandemic, a surge in state and federal funding resulted in the proliferation of new programs and initiatives. These programs were accompanied by applications, plans, data submissions, and reports. The state’s multiple measures accountability system has also required more reporting by LEAs to the state.

As was the case prior to LCFF, LEAs report that many reports are duplicative, cumbersome, and often require LEAs to report the same data (which the state already has) over and over. Adding to the frustration some LEA staff feel is the suspicion that not all of the information reported will be reviewed and used by the entities requiring it.

Balancing accountability and evaluation with opportunity costs. State reporting requirements serve important purposes, among them the safeguarding of public funds and the evaluation of policy initiatives.

But according to the California School Boards Association (CSBA), the cumulative impact of mandated state and federal reports, data submissions, and planning documents, draws resources away from critical tasks and responsibilities of LEA staff, especially in California's smaller districts and COEs. In a 2024 report, *Drowning in Documentation*, CSBA notes the following effects:

- High price in time, human capital, cost and opportunity cost: Administrators' planning and reporting efforts are so extensive that they cut into time available for instructional leadership, school improvement, school climate and other critical functions.
- Ever-growing burden: While new programs and mandates add to the long list of reporting requirements, state and federal government rarely phase out requirements, even when they become duplicative or are no longer actively reviewed by their respective agencies.
- Too much data to digest: Some districts, particularly smaller ones, lack the time and capacity to use the required data for their own purposes. State agencies often lack the staff capacity to analyze required plans, reports and data submissions or provide constructive feedback and technical assistance to LEAs.
- Disproportionate burden for smaller districts. Large districts might have dozens of staff to meet these requirements. Small to medium districts might have anywhere from a handful to more than a dozen staff available to complete reports, plans, and data submissions. Very small districts might rely on the superintendent, principal or superintendent/principal to meet these requirements, taking time away from their other administrative and educational leadership responsibilities. Alternatively, very small districts may have to hire outside consultants to do this work, consuming valuable resources that could be spent on student support and instruction. A significant amount of public funding is only available through discretionary grants that require additional time for applying, planning, reporting. Smaller and less-resourced districts often cannot take on this additional workload, creating opportunity gaps for students, staff and schools.

What kinds of information do LEAs send to the state? According to the author, LEAs produce approximately 170 reports per year – nearly one for each day of the school year. LEAs submit numerous sets of data through these and other systems to meet state and federal requirements:

- California Basic Educational Data System
- California Longitudinal Pupil Achievement Data
- Standardized Account Code Structure System

- Principal Apportionment Data Collection System
- Child Nutrition Information Payment System
- The Consolidated Application and Reporting System
- Federal Program Monitoring Reviews
- Fiscal and Attendance Data.
- Every Student Succeeds Act (ESSA) Per-Pupil Expenditures System
- Civil Rights Data Collection
- Special Education

Some of the required plans, applications, and reports LEAs submit to the fall into the following categories:

- Accountability
- Safety and Transportation
- State Block Grants and Special Funds
- Special Education
- Pandemic Recovery programs
- Discretionary Grants

A more comprehensive approach. This bill proposes to require the CDE to produce a report and recommendations on reports which could be consolidated. This is a good start. ***The Committee may wish to consider*** that more could be done to improve reporting processes, starting with the Legislature and the Governor. They may wish to consider the following questions when deciding whether, and how, to establish a new reporting requirement:

- Purpose: Why is this information being requested, and how will it be used?
- Audience: Who is going to use this information?
- Value: Of how much value is this information, and what is the opportunity cost?
- Feasibility: Is it possible to get the desired information, even from small LEAs?
- Duplication: Is this information already reported to the state in some other form?
- Duration: How long should this requirement be in effect?

Some elements of a better system could include:

- Guidelines and a process for establishing new reporting requirements, including consideration of the questions above;
- Technological solutions, such as auto-filled template reporting forms;
- Accommodations for small LEAs to reduce the disproportionate burden placed on them;
- Risk-based reporting, similar to the way in which audits are sometimes conducted;
- Auto-repeal of reports, similar to Government Code 10231.5 for state reports; and
- Annual pruning of unnecessary requirements, through the annual omnibus Committee bill.

Single Plan for Student Achievement was an earlier effort to consolidate reporting requirements. Prior to the enactment of the LCFF in 2013, LEAs were required to submit annual plans for many of the dozens of categorical programs they operated. LEAs spent significant staff time complying with duplicative planning and reporting requirements for these

programs. They were required to provide some information to the CDE (demographics of students, school codes, staffing information) dozens of times each year.

In response to concerns similar to those expressed by supporters of this measure, SB 374 (O’Connell), Chapter 724, Statutes of 2001, added numerous programs to the Consolidated Application, eliminated the Program Quality Review, and established the Single Plan for Student Achievement (SPSA), which allowed LEAs to meet the reporting requirements for numerous categorical programs through a single plan. The Assembly Education Committee analysis for that bill notes, “Supporters of the bill believe that it will streamline state requirements for local planning and replace ‘process’ requirements with attention towards state standards and accountability for results.”

Arguments in support. The California School Boards Association writes, “CSBA believes strongly in the importance of accountability and ensuring students’ needs are being met, both from an academic standpoint and from a social-emotional one.

Yet, as district requirements and state mandates continue to grow—from increased mental health needs of students, required compliance with necessary public health protocols due to the pandemic and significant programmatic requirements, including drafting and adopting a district Local Control Accountability Plan (LCAP), implementing the Expanded Learning Opportunities Program (ELOP) and the California Universal Meals Program—many LEAs have limited staff and resources to identify, develop and submit this high number of reports.

The assumption is that each report plays a role in helping inform the state about the status and progress of its public education system. However, this is unclear. Some reports may be obsolete, others duplicative, and some go unreviewed. Ultimately, it is the sheer number and scope of reports that places a significant burden on LEAs – pulling administrative staff away from the day-to-day needs of their students.

By assessing the number, type and scope of reports, this will help to identify where information could be condensed and where some reports could be eliminated – freeing up more time to provide for the needs of California’s students. This will also help state lawmakers be informed about what reports are most helpful to policy development while also dispensing with others that may have no further benefit. Lastly, this will help save LEA costs by reducing the financial burdens associated with producing obsolete reports or reports that could be consolidated with others.”

Recommended Committee amendments. Staff recommends that this bill be amended to:

- 1) Strike the requirement that the report include administrative costs for completing the reports.
- 2) Specify that the input on recommendations be sought from a diverse array of LEAs that vary in size, type, geographic location, and pupil and demographics.
- 3) Add “eliminated, or truncated,” before “consolidated” in (a)(3).
- 4) State legislative intent that the information collected for this report will help alleviate future burdens and costs on LEAs.

REGISTERED SUPPORT / OPPOSITION:

Support

Alameda County Office of Education
Association of California School Administrators
California Association of School Business Officials
California School Boards Association
Compton Unified School District
Riverside County Public K-12 School District Superintendents
Riverside County Superintendent of Schools
Santa Clara County School Boards Association
Small School Districts Association
Torrance Unified School District

Opposition

None on file

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