

The Weight of Good Intentions

Initial Measurement on the Rise in Compliance Activities a Decade After California's Funding and Accountability Reforms

A Research Brief | February 2026 | Written by: Jason Willis

Executive Summary

In 2013, California enacted the Local Control Funding Formula (LCFF), an ambitious public education reform designed to simplify school funding, dramatically reduce the web of categorical programs, and shift decision-making authority to local educational agencies (LEAs). The grand bargain was clear: less compliance and more flexibility for LEAs in exchange for documenting investments at the local level that better student outcomes.¹

A decade later, anecdotes from California education administrators suggest a rise in compliance tasks not seen since periods before the dawn of the LCFF, yet no systematic evidence has been collected to support these claims, until now.² A synthesis and analysis of data from legal, financial, planning, and audit sources, along with survey findings on education administrators' sentiments toward key LCFF components, provide a strong indication of the rising tide of compliance tasks facing California's public schools.

- **The Education Code has grown substantially.** The central bundle of laws guiding California's public education system grew by about 27 percent in estimated print-equivalent pages and word count between the 2019 and 2025 published editions (page counts rose from roughly 2,590 to 3,298).³ This growth coincides with several large, text-heavy K–12 additions between calendar years 2021 and 2024 (e.g., more detailed independent study rules, Expanded Learning Opportunities Program (ELO-P), universal meals, Universal Transitional Kindergarten (UTK) expansion, and other program requirements, etc.).
- **Non-LCFF investments of Proposition 98 have multiplied,** even though LCFF investments remain the bulk of TK–12 Proposition 98 funding (approximately 87 percent). Between fiscal year (FY) 2015 and FY 2025, the number of non-LCFF, funded

¹ Public Advocates. *California's New School Finance Law: Local Control Funding Formula (LCFF)*. Sacramento, CA. Accessed: February 2026. <https://publicadvocates.org/campaigns/lcff/>

² The term *education administrator* in this research brief refers to any educational professional who oversees the administrative, instructional, operational, financial, or facilities functions of an LEA in California. Most often these individuals are physically located in a Central Office. Depending on the size of the school system, they may also reside at a school location. This does not include principal, assistant principals or otherwise school-based administrators.

³ Source: West (Thomson Reuters). *California Education Code*, 2019 ed. (California Desktop Codes). Print length 2,590 pages.; Micheli, C. (2025, March 27). *What is in California's Education Code?* California Globe. Author's calculations on pages and word counts were calculated by taking a sample of the Education Code for page and word count then estimating the total based on page dimensions and thickness of the physical text. Note that these counts exclude Title 3 (higher education) and portions of Title 1 (Early Education).

programs rose from 13 to 43 (in FY 2025, there were 14 legacy ongoing, 17 new ongoing, and 12 new one-time programs). Funding for these programs rose from about \$7.0 billion to about \$18.3 billion (nominal) over that period.⁴

- **California’s School Accounting Manual (CSAM) has had to incorporate an increasing number of resource codes from both state and federal funding streams.** For example, between the 2013 and 2024 published editions, the number of state resource codes in the CSAM, which sets standardized accounting rules for LEAs, increased from 19 to 35, and the number of federal resource codes increased from 97 to 104.
- **Audit requirements have increased following new laws and funding allocated through Proposition 98 and federal programs.** In recent years, roughly 9 in 10 LEA audit compliance findings have been tied to state requirements, with temporary spikes in federal findings during major federal relief periods (e.g., pandemic relief).
- **The Local Control and Accountability Plan (LCAP) template and instructions expanded sharply between FY 2015 and FY 2025.** The LCAP is the central planning and funding transparency tool in the LCFF design. Over a ten-year period, the template and instructions grew from about 4,100 to about 23,100 words (+463%), with the number of major requirements increasing from 11 to 48.

The perspective of education administrators on the components of the LCFF aligns with these quantitative measures and reinforces anecdotal findings about the LCFF and other Proposition 98-funded programs. Recent survey data from a sample of education administrators show:

- There is overwhelming agreement among education administrators (mean = 4.30 on a 5-point scale) that the LCAP has become unmanageably large.
- There is skepticism about the LCAP’s influence on student outcomes (mean = 2.63 on a 5-point scale), with the smallest LEAs reporting the lowest belief on this measure (mean = 2.17).⁵

⁴ Fiscal year references are a July 1 fiscal year. For example, FY 2025 spans the period July 1, 2024 to June 30, 2025.

⁵ These findings are the result of the author’s analysis of a survey of education administrators in the fall 2025. These data were collected as a part of the forthcoming *Getting Down to Facts III* studies. The sample included 909 valid responses from education administrators that were representative of the California population thereby making the statements applicable across the entire population.

1. The Local Control Paradox

The grand bargain at the center of the LCFF contained a paradox—*in order to get local control, you have to give up some control*. That control for LEAs came in the form of a measurement and accountability architecture—the eight state priorities, the LCAP template, the California School Dashboard, and a statewide system of support—intended to be lightweight enough to preserve local autonomy while ensuring transparency and equity for communities and other interested actors. The state would define *what* had to be addressed, but not *how*. Districts would decide their own goals, choose their own strategies, and direct their own resources. County offices of education would serve as procedural gatekeepers and collaborative partners, not programmatic officers. And the state would step in only when local performance persisted.

Close observers of California’s implementation of the education funding and accountability law expressed concerns about the lack of specificity in the roles and responsibilities between state and local systems. In particular, there was concern that, in the absence of a clear, shared understanding of local and state responsibilities, this created a vacuum through which the state may revert to previously used policy instruments. Chris Edley, then at the Graduate School of Education at the University of California, Berkeley, commented, “The commitment to localism has not been adequately conditioned upon the effective representation of the individuals and the interests of groups lacking in power.” Edley went further, aptly pointing out that in the juxtaposition of local control with more equitable and democratic pursuits, a necessary ingredient is a lack of capacity. Succinctly, he noted, “If we delegate responsibility, then we have to make sure that the folks who are getting that responsibility have the capacity to use it well or get the assistance they need in order to use their authority effectively.”⁶

So then, without clarity of roles and responsibilities for local and state actors, the ongoing capacity needs and an architecture that created the conditions for the state to attach new requirements and exert control, historical policy instruments emerge. Brought on potentially by the combination of the COVID-19 pandemic and a period of high inflation, the state leaned into these previous instruments, adding new programs and funding, not through the categorical funding streams that the LCFF had dismantled but through the very planning, engagement, and accountability tools that were designed to hold the grand bargain in place to protect local control and empower political minorities in asserting their needs.

A review of these new programs and funding reveals that few people would disagree with the expressed need it attempted to address and the resulting policy solution. However, both the

⁶ Budgeting for Educational Equity Podcast. [The Locus of Local Control: Revisiting the LCFF \(Part Two\)](#). California Association of School Business Officials (CASBO) and WestEd. Sacramento, CA.

volume and type of policy directives accumulated over five state budget cycles created conditions that are nothing short of overwhelming to any education administrator.

1.1 California Compliance Activities and the Systemization of Inscribing State Law on Local Practices

Compliance – the act of behaving within established state and federal laws, regulations, and funding restrictions – is a natural byproduct of setting in place those very rules. In a public system as vast, complex, and decentralized as California public education, these rules help mold, to some extent, how local education agencies (LEAs) deliver to communities what policymakers promised when establishing the law. Regulatory agencies such as the California Department of Education (CDE), the State Controller’s Office (SCO), and, to a lesser degree, the California Department of Healthcare Services (DHCS) then further establish regulations, design monitoring systems, and auditing checkpoints. Unlike the private sector, where compliance is often binary (compliant or not), public education operates on a continuum with varying degrees of risk, scrutiny, and penalty—creating an annual gauntlet for education administrators.

There are only a handful of research-based estimates of the time that education administrators spend on compliance activities.⁷ Notably, none are specific to California. To generate some insight into these changing activities, we can look to the inscription process of state law itself and the trail of documentation it leaves. Once passed by the Legislature and signed by the Governor, several steps are taken: (1) the new law text is updated in the Education Code, (2) the program is provided a resource code (if applicable) and encoded in the CSAM, (3) the LEA’s LCAP instructions and template are updated (if appropriate), and (4) assigned divisions or departments within CDE review for monitoring requirements or controls on how funds are distributed, and (5) the law is reviewed for any provisions related to annual audits.

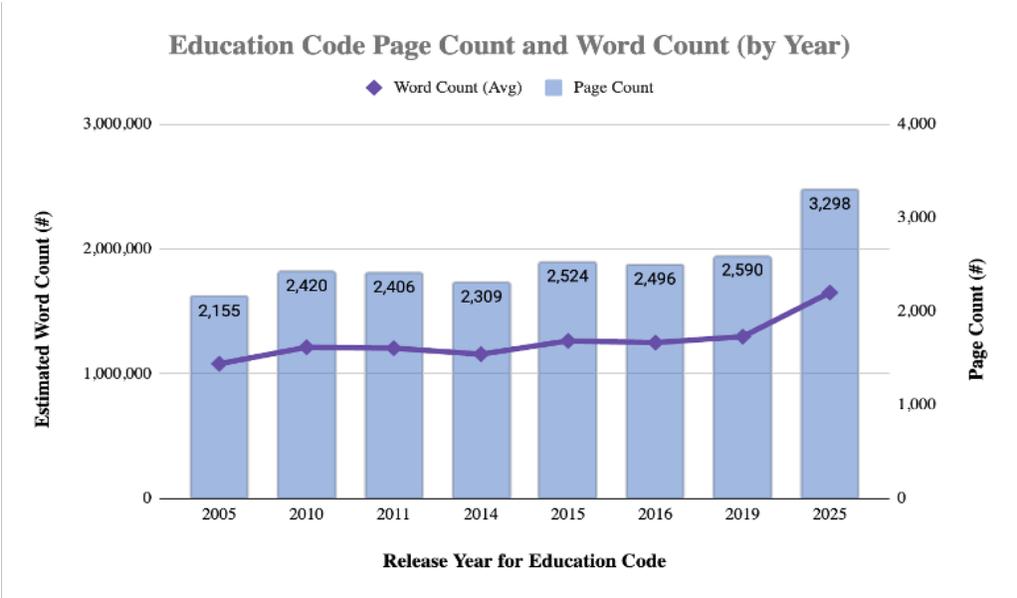
This is essentially institutional fingerprinting. That is, every law leaves identifiable traces – fingerprints – across a known set of regulatory documents. Taken individually, each trace is unremarkable; it is simply how the system processes new law. But taken together and measured over time, these traces constitute a documentary record of the compliance activities that has never been systematically assembled. In the absence of reliable time-use data from administrators themselves today, this study turns to the inscription process itself, treating the regulatory trail as a proxy for the accumulating demands placed on LEAs. The subsequent sections walk through each set of documents reviewed as laws were translated into other regulatory mechanisms that LEAs had to follow.

⁷ Horng, E. L., Klasik, D., & Loeb, S. (2010). Principal time-use and school effectiveness. *American Journal of Education*, 116(4), 491-523.

2. California Laws: Growth of the Public Education Code

Multiple editions of the California Education Code (“Ed Code”) were analyzed to assess changes in legal requirements over time.⁸ The Ed Code currently contains three titles, with numerous divisions, parts, chapters, and articles, each containing hundreds of code sections. Despite the LCFF reform, which aimed to consolidate funding programs, the Ed Code page and word counts have had modest increases between 2014 and 2019 (see Figure 1), but then experienced a substantive increase between 2019 and 2025, suggesting that education administrators have most recently been burdened by the accumulation of compliance activities.

Figure 1. California Education Code Estimated Page and Word Count (by Year)



The most notable change in page and word counts occurred between the 2019 and 2025 editions (the period of the COVID pandemic and recovery), with an approximately 21 percent

⁸ As summarized by Micheli (2023), the Ed Code consists of the following: Title 1 (General Education Code Provisions): 1 Division, 21 Parts, 172 Chapters, 353 Articles; Title 2 (Elementary Secondary Education): 3 Divisions, 23 Parts, 141 Chapters, 481 Articles; Title 3 (Postsecondary Education): 6 Divisions, 38 Parts, 173 Chapters, 430 Articles. For this analysis, only Title 2 and applicable parts of Title 1 were included in this analysis. Source: Micheli, C. (2022, March 27). [What is in California’s Education Code?](#) California Globe.

increase over that period alone. This growth reflects not only the volume of requirements but also the complexity administrators were likely navigating. The Ed Code is permissive—districts are free to take any action not specifically prohibited—yet the sheer volume of provisions creates uncertainty and may contribute to defensive compliance behaviors. That is, education administrators are less likely to take action unless they first ensure it isn’t specifically prohibited. So, what explains the substantial growth in the Ed Code between 2019 and 2025?

2.2 Explanations for the Growth in the Education Code (2019 to 2025)

The jump from approximately 2,590 pages (2019) to 3,298 pages (2025) is driven mostly by big, text-heavy K–12 additions in 2021 through 2024. Namely, these included six notable programs: an independent study overhaul, the Expanded Learning Opportunities Program (ELO-P), Universal Transitional Kindergarten (UTK) expansion, new nutrition standards, community schools, instructional materials requirements, and related clean-up language.

- **Independent Study (IS).** Assembly Bill (AB) 130 in 2021 made independent study an option that all LEAs must offer. It also added long, detailed conditions of apportionment (e.g., live/ synchronous interaction rules, tiered re-engagement rules, device/connectivity assurances, written agreement timelines), and AB 167 (2021) and AB 181 (2022) refined the conditions (e.g., further addressing timelines, students with disabilities, and emergency-closure planning via § 46393). These bills resulted in lengthy additional sections of the Ed Code spread across multiple articles.⁹
- **Expanded Learning Opportunities Program (ELO-P).** The program, added in 2021, requires access to before- and after-school programs, 30 non-school days, and a 9-hour day. It also requires LEAs to adopt and post their plans and creates audit/report triggers if the reports are not submitted.¹⁰
- **Universal Meals.** Added in 2021 and later refined, it codifies statewide free meals for all K–12 students, a reimbursement framework, and program conditions, adding substantial new text in the pupil nutrition chapter (plus tweaks to the § 49550 series).¹¹
- **Universal Transitional Kindergarten (UTK).** This was expanded in 2021–22 with phased-in age eligibility through 2025–26, detailed TK class-size and adult-to-pupil ratio

⁹ Education Code §§ 51745, 51747, 51749.5, 51749.6 (plus § 46393). California Department of Education. (2025, December 18). [Independent Study: Legal Requirements](#). See also [AB 130 \(2021\)](#) trailer-bill text and history. Sacramento, CA.

¹⁰ Education Code § 46120 California Department of Education. [Expanded Learning Opportunities Program \(ELO-P\)](#). Sacramento, CA.

¹¹ Education Code § 49501.5. California Department of Education. [California Universal Meals](#). Sacramento, CA.

requirements, and funding triggers if requirements are not met. This added multiple subsections to the Ed Code.¹²

- **Instructional Materials.** The CDE was directed to issue guidance on inclusive materials by July 1, 2025. Other new information was added (§ 60150), and amendments were made to sections 60040 and 60119 to add complaint, enforcement, and fiscal penalty mechanisms for insufficiency and to expand notice and oversight text.¹³
- **Community Schools.** Sections 8900–8902 were added in 2021, specifying program definitions, plans, and annual legislative reporting requirements through 2031. These are not huge but are entirely new sections.¹⁴

A long section focused on various kinds of literacy (§ 53008) in 2023–24 and created a full new chapter covering policy findings, a State Board of Education expert panel, LEA annual K–2 screenings from 2025–26, opt-out options, and non–high-stakes limits.¹⁵

Cleanups and trailer bill edits across Title 2 (smaller additions, but many) and omnibus trailers in 2022 through 2024 (e.g., AB 181, SB 153) made dozens of edits that lengthened scattered sections (focused, for example, on independent study refinements, monitoring and finance, and reporting). Each edit is modest on its own, but together they have added dozens of pages.¹⁶

The 2020 COVID distance learning article (§§ 43500–43511, § 43509) was temporary and was inoperative by 2022, so those pages have fallen out of the Ed Code, but the big additions detailed above more than offset that loss.¹⁷

¹² Education Code § 48000. California Department of Education. [Universal Prekindergarten FAQs](#). Sacramento, CA.; and [Transitional Kindergarten FAQs—Instructional Time and Fiscal Requirements](#) (including FY2025–26 ratio requirements).

¹³ Education Code § 60040.5. California Department of Education. [Accurate and Inclusive Curriculum \(AB 1078\) Guidance](#). See also [AB 1078 \(2023\)](#) text and chapter history.

¹⁴ California Department of Education. [California Community Schools Partnership Program \(CCSPP\)](#).

¹⁵ California Department of Education. [Reading Difficulties Risk Screener Selection Panel](#).

¹⁶ Education Code changes from budget trailer bills and subsequent clean-up legislation in 2021–2024 (e.g., AB 130 (2021): <https://legiscan.com/CA/bill/AB130/2021>; AB 181 (2022): <https://legiscan.com/CA/bill/AB181/2022>).

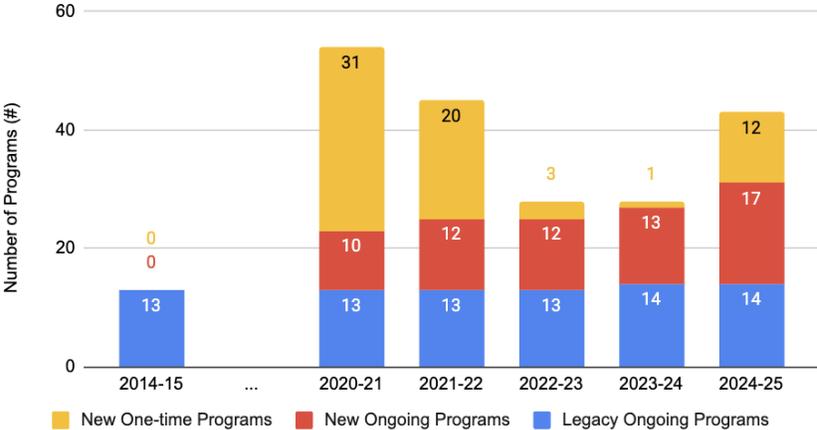
¹⁷ California Education Code (COVID-era distance-learning provisions): [§ 43500](#), [§ 43509](#), and inoperative provision [§ 43511](#).

3. Proposition 98: Growth of LCFF and Non-LCFF Investments

To measure changes in the number of resource streams (historically referred to as categorical programs) and the amount of funding flowing through each stream, a multiyear period of final state budget details was analyzed. This was then triangulated with updates to the CSAM, the accounting manual used by all state, county, and local education agencies to account for funds allocated to subsidiary government systems.¹⁸

The amount of non-LCFF funding flowing to K–12 education has increased substantially in recent years, particularly compared to the first year after the LCFF’s passage. Figure 2 shows the count of all non-LCFF funding investments for FY 2015 and FY 2021 through FY 2025. The figure shows the count of programs that are categorized in three ways: (1) legacy ongoing programs that have been funded in an ongoing manner since at least FY 2015, (2) new ongoing programs introduced in FY 2021 that have received funding for each of the last 5 years, and (3) new one-time programs introduced in FY 2021 that have explicit end dates in statute.

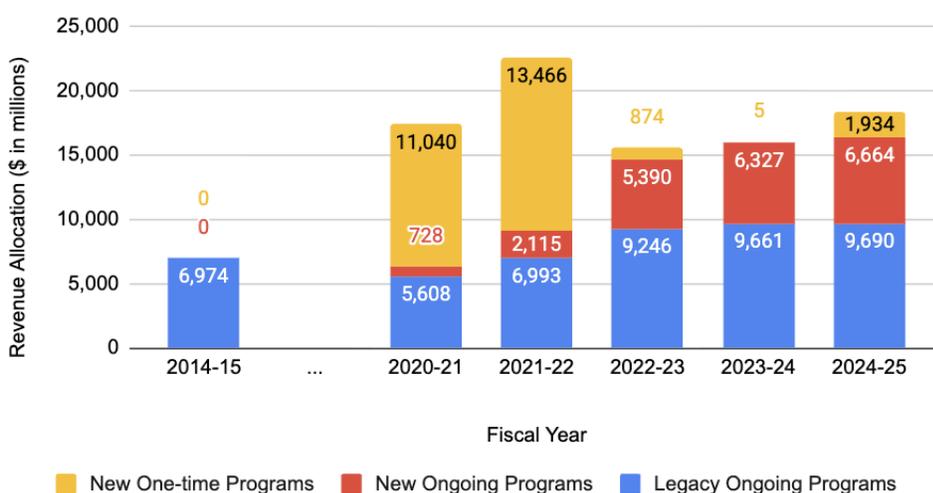
Figure 2. Number of Various Types of Non-LCFF Programs (FY 2015 to FY 2025)



¹⁸ Author’s analysis of Proposition 98 programs using [California Department of Finance enacted budget summaries and budget detail](#) from 2014-15 to 2024–25:). This information was also cross walked to the resource codes in the California School Accounting Manual (CSAM).

Starting in FY 2021, the number of new ongoing and one-time programs increased sharply. Compared to 13 programs in FY 2015, there were 54 programs in FY 2021—a more than 300 percent increase in the program count. Similarly, Figure 3 shows a similar pattern of growth in these programs, measured in dollars invested; in just 2 years, FY 2021 and FY 2022 LEAs were appropriated \$24.5 billion in one-time funding.

Figure 3. Funding for Various Types of Non-LCFF Programs (FY 2015 to FY 2025)



Triangulating Enacted Budget Details with LEA’s Required Accounting Instructions

California Education Code Section 41010 requires that LEAs use accounting systems that comply with the definitions, instructions, and procedures published in the CSAM. Approved by the State Board of Education, the CSAM provides guidance on accounting policies, including the Standardized Account Code Structure (SACS), which all districts statewide must use for financial data collection and reporting.

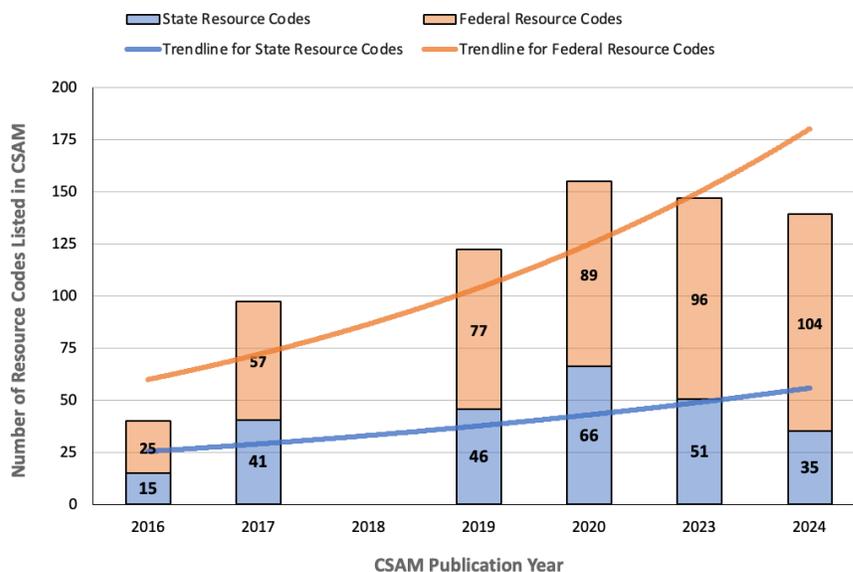
Frequently, the State of California publishes an updated CSAM, which outlines all the financial rules governing the accounting for monetary resources that flow to LEAs in the state. Its length is substantial. The most recent published version is 630 pages long. Often, practitioners cite limitations on how they can use resources, claiming that the rules won’t allow them to spend money on something or that there isn’t enough flexibility in resource use. The root of such claims lies in the rules governing the funds the state distributes to LEAs (including federal funds received by the state).

In California, as in most states, these funds are accounted for through resource codes. These are four-digit codes that enable tracking of how funds are used across any school system. Think of it as an AirTag for money. If you know the code, you can find it anywhere in the system's vastness, including understanding how it was used. Though understanding how the funds were used is limited by the additional coding beyond the resource. Managing even one of these resource codes in a school system is a challenge. It requires the assigned program and fiscal staff to understand the amount, use dates, allocation limitations, and other parameters governing the fund's use.

The number of these resource codes provides a window into the management burden that LEAs face for these resources. Notably, not all LEAs receive funds for all of these resource codes. The table below shows, in the CSAM, the number of resource codes for which monetary resources could have been classified for California LEAs by year.

Resource codes within the CSAM reflect funding streams and their associated compliance requirements. Analysis of resource code counts from 2016 to 2024 reveals important patterns in regulatory expansion.¹⁹ Figure 4 shows the result of this analysis.

Figure 4. Number of Resource Codes Listed in CSAM, by Select Years



State and federal resource codes tend to grow over time, and major crises reshape the code structure: During the Great Recession, categorical programs were consolidated even as the American Recovery and Reinvestment Act (ARRA) created new federal tracking requirements;

¹⁹ Author's analysis of California School Accounting Manual (CSAM) resource code listings across editions, 1974 to 2024. Current CSAM edition: California Department of Education (2024), California School Accounting Manual (CSAM), 2024 edition. <https://www.cde.ca.gov/fg/ac/sa/documents/csam2024.pdf>.

during the pandemic, the Elementary and Secondary School Relief (ESSER I–III) Fund and new California initiatives added another layer of codes. CSAM also became more detailed starting with the 2004 edition, adding greater specificity to the accounting manual.

Although these counts represent codes available in the system, not codes every LEA uses, a larger menu of codes increases the complexity of financial management and the risk of reporting errors.

4. Audit Requirements: The Double Check on Administrator’s Documentation

Ed Code Section 41020 requires each LEA to complete an annual audit. The audit report must be completed in compliance with the K–12 LEA Annual Audit Guide, which is updated every year by the SCO and submitted to the Education Audits Appeal Panel (EAAP). The CDE provides guidance to LEAs, reviews annual audit reports, and ensures certain audit findings are resolved.²⁰ The analysis examined both the annual audit guides and the SCO reports, which review trends and updates from the audits.²¹

As the audit guide states, “The annual audit reports by certified public accountants (CPAs) are the primary source of information regarding LEA compliance with state and federal requirements.”²² Analyzing audit information provides an initial window into the changes in requirements that auditors must review. This also provides insight into the level of effort that LEAs put into these activities.

²⁰ Audit findings are assigned codes indicating their category: 10000 (Attendance), 20000 (Inventory of Equipment), 30000 (Internal Control), 40000 (State Compliance), 50000 (Federal Compliance), 60000 (Miscellaneous), 61000 (Classroom Teacher Salaries), 62000 (Local Control Accountability Plan), 70000 (Instructional Materials), 71000 (Teacher Misassignments), and 72000 (School Accountability Report Card).

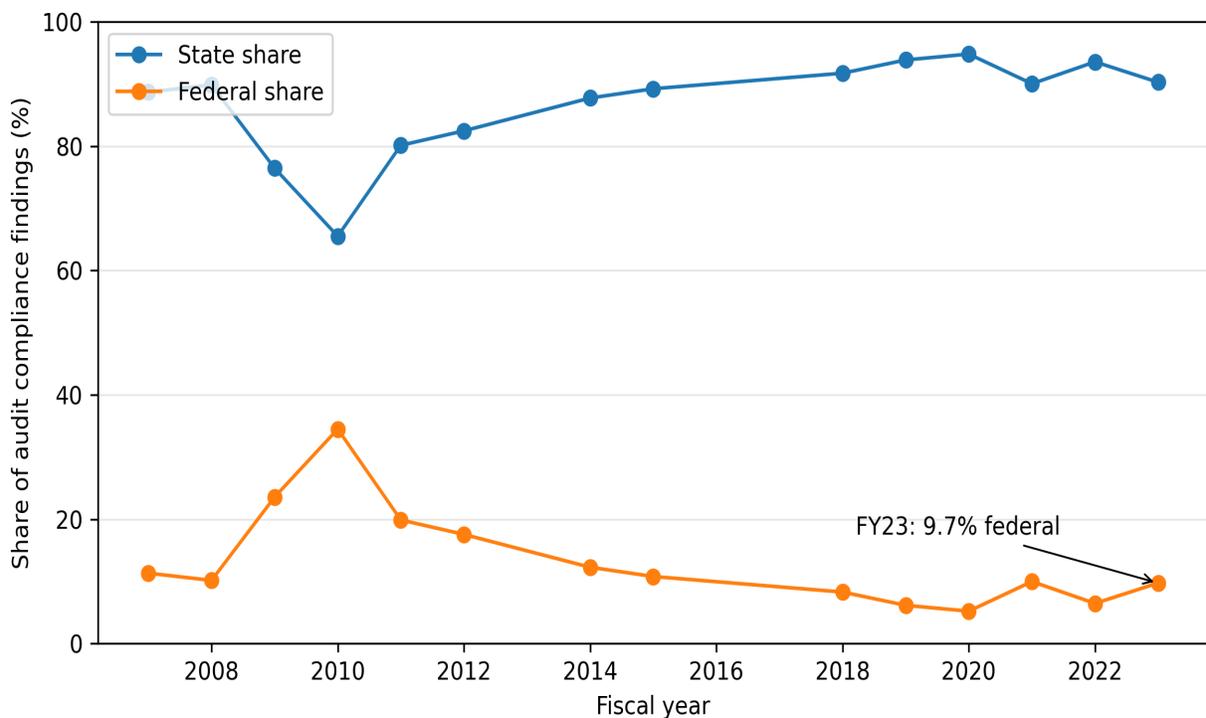
²¹ Audit requirement framework and guidance: Education Audit Appeals Panel. (2024, July 1). Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting (2023-24-25). <https://eaap.ca.gov/wp-content/uploads/sites/281/2024/06/K-12-Audit-Guide.pdf>. See also CDE overview of LEA annual audit requirements: <https://www.cde.ca.gov/fg/ac/sa/leaannualaudit.asp>.

²² California State Controller’s Office. *K-12 Education Audit Guide*. Sacramento, CA. version 2024.

4.2 Audit Findings Trend Analysis

As shown in Figure 5, most audit findings result from state, rather than federal, legal or regulatory requirements.²³ The most substantial change in the proportion of audit findings between federal and state programs occurred during the Great Recession (FY 2008 to FY 2010) when ARRA funds were being used. This contrasts with the ESSER period (FY 2021 to FY 2023), which had substantially fewer federal findings proportionally.

Figure 5. Proportion of LEA Audit Findings by Federal or State (Fiscal Year)



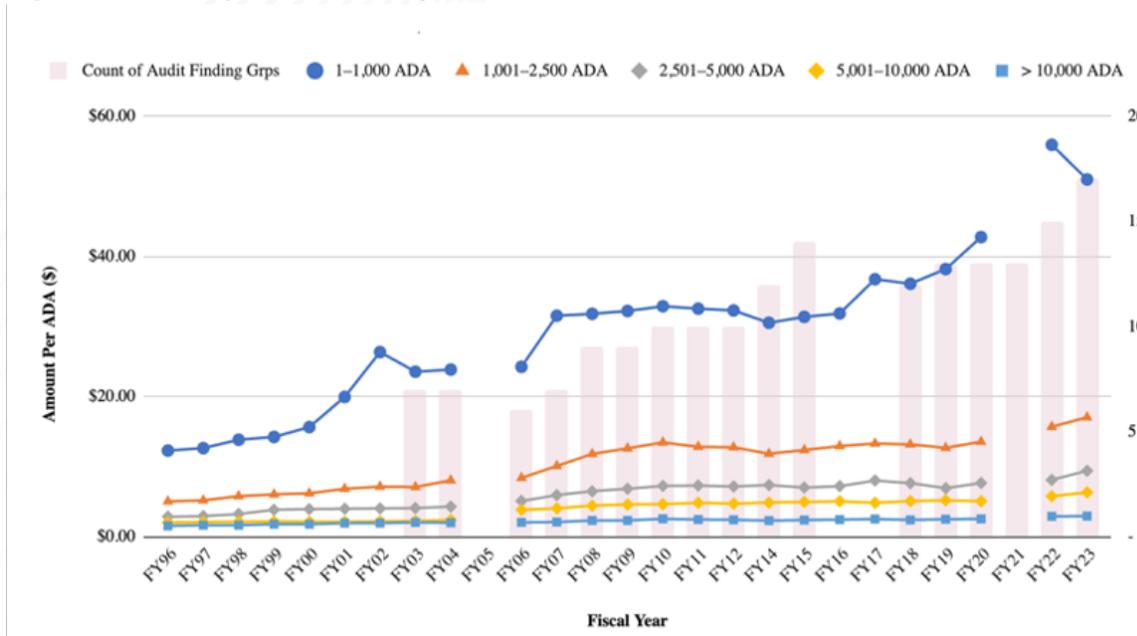
The increase in the cost per average daily attendance (ADA) for small LEAs (1–1,000 ADA) is substantial and may indicate that the lack of differentiation in state policy forces them to devote disproportionate time and resources to compliance activities.

²³ Education Audit Appeals Panel. (2024, July 1). Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting (2023-24-25).

State Controller's Office. (2024). Annual Financial Report of California K-12 Schools (series).

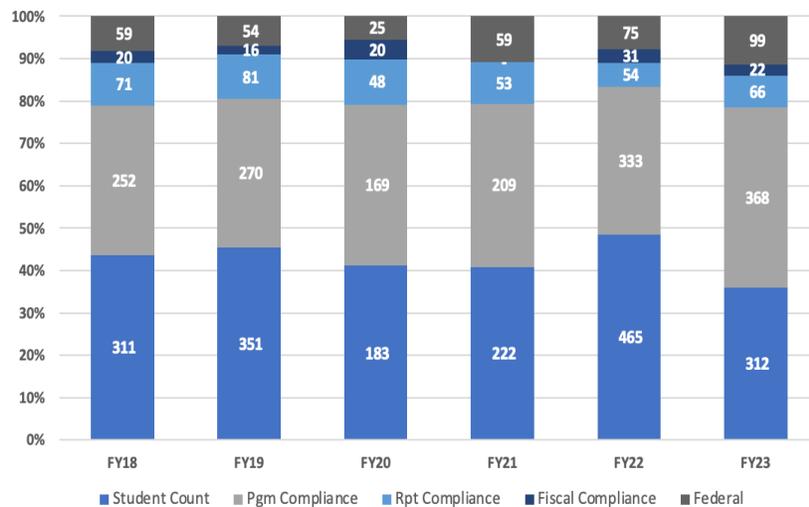
State Controller's Office. (2019, June). Annual Financial Report of California K-12 Schools, Fiscal Year 2017-18.

Figure 6. Average Audit Cost per ADA (FY 1996 to FY 2023)



The types of audit findings have increased over time, reflecting the expanding compliance landscape. Notably, the proportion of fiscal versus program findings has shifted. In FY2023, fiscal audit findings accounted for only 14 percent of total findings, indicating that program compliance requirements have become the dominant source of audit findings (see Figure 7).²⁴

Figure 7. California LEA Audit Findings by Type (FY 2018 to FY 2023)



²⁴ California State Controller. Annual Financial Report of California K-12 Schools. Report to the State Superintendent of Public Instruction. Sacramento, CA. Page 10. Fiscal Years 2018 to 2023.

5. The Local Control and Accountability Plan: A Case Study in Complexity

5.1 The LCAP and its Original Intent

The LCAP is a tool for LEAs to set goals, plan actions, and leverage resources to meet those goals to improve student outcomes. One of the LCFF’s key innovations was to shift the focus of state accountability from “inputs” to “outputs.” Instead of focusing on whether districts are simply spending money within categorical programs, the LCFF holds districts accountable for improving students’ opportunities and outcomes. The Reason Foundation (2020) noted that while the LCAP requirements “might sound good in theory, they seem to be producing little value and reinforcing a compliance mindset.” According to one Superintendent quoted in their analysis: “The LCAP is meant to demonstrate ‘due diligence’ to assess and meet needs, but it’s become too much of a compliance document—too much about dotting all the i’s and crossing all the t’s.”²⁵

5.2 Quantitative Analysis of LCAP Instructions Text

Comprehensive analysis of the LCAP template and instructions from FY 2015 to FY 2025 shows a sharp increase in length and linguistic complexity. Sentences increased about eightfold, words and characters nearly fivefold, and long and polysyllabic words about fivefold. Although the template language contains repetition (high type-token ratio), the overall document has become much longer and harder to navigate (see Table 1).

Table 1. Text Analysis of LCAP Template and Instructions (FY 2015 and FY 2025)²⁶

Statistics	FY 2014 LCAP	Change (%)	FY 2025 LCAP
Sentences	79	816%	724

²⁵ Smith, A.G. 2020. California’s Local Control Funding Formula Provides a Model for K-12 School Finance Reform. Reason Foundation. Los Angeles, CA.

²⁶ California Department of Education. (2014, March). [LCAP Template \(Agenda Item 01, Attachment 1\)](#).

Statistics	FY 2014 LCAP	Change (%)	FY 2025 LCAP
Words	4,102	463%	23,083
Characters (no spaces)	21,437	492%	126,973
Syllables	7,012	492%	41,519
Polysyllabic words (>3 syll.)	795	573%	5,354
Long words (>6 letters)	1,584	495%	9,432
Avg sentence length (words)	52	-39%	32
Avg word length (letters)	5	5%	5
Avg syllables per word	2	5%	2
Type-Token Ratio			0.065

Commensurate with these substantive increases in the text of the instructions, there has been an increase in the number of major LCAP requirements.²⁷ Across this same span of years, the number of major requirements increased from 11 to 48. The LCAP instructions were also analyzed for text complexity using various well-established measures. Those measures and results are summarized below:

- **Flesch Reading Ease (0–30 = very difficult):** While ease of reading in the LCAP templates and instructions has improved over time, it remains in the “very difficult” range typical of legal and academic documents, with a score of 26.
- **Flesch-Kincaid Grade Level:** The level has decreased, but the templates and instructions’ text remain at a college/graduate level. The average American reads at a grade 7 level.
- **LIX (>60 = very difficult):** The language-agnostic difficulty score of the LCAP templates and instructions has declined over time but remains in the “very difficult” category.

California Department of Education. (2024). [Adopted LCAP Template \(2024–25\)](#).

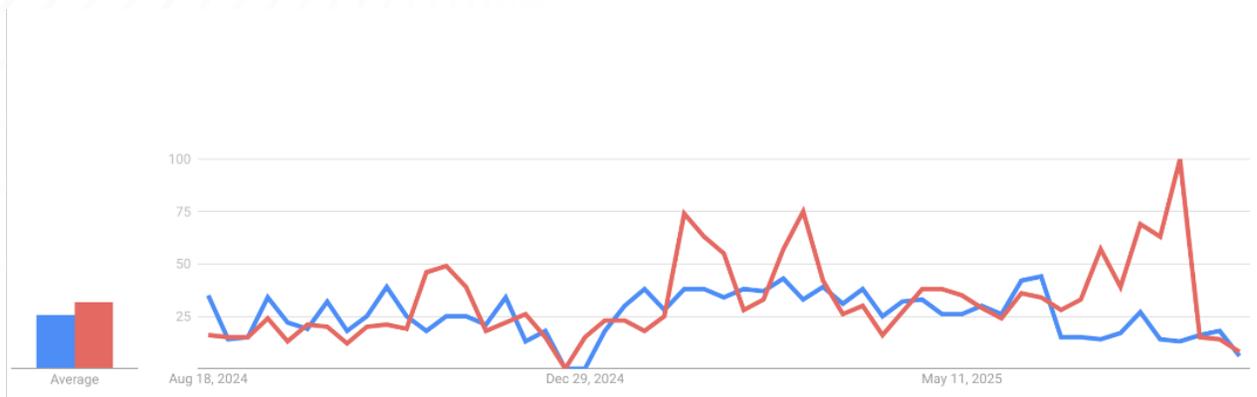
California Department of Education. (n.d.). [LCAP Template Instructions](#).

²⁷ Major requirements are defined here as subsections within the Education Code that explicitly call out requirements for LEAs to complete under the LCAP.

5.3 Documented Engagement in the LCAP

As shown in Figure 8, one way to gauge engagement in the LCAP (blue trend line) is to compare how web traffic rises and falls against other topics, such as school district budgets (red trend line). This measurement indicates interest over time—that is, normatively ranked 0–100. And while the LCAP does get occasional spikes in interest, school district budgets continue to see much higher interest rates than the LCAP.

Figure 8. Engagement of School District Budget versus LCAP Over Time



6. Administrator Perspective on LCFF Components

6.1 Overall Sentiment

Survey data collected from over 900 LEA administrators reveal significant patterns in sentiment toward the LCAP, California School Dashboard, and associated requirements. Administrators rated five statements about the LCAP and Dashboard on a 5-point scale (1=Strongly disagree, 5=Strongly agree), as shown in Table 3.

Table 3. Survey Statements Rated by LEA Administrators

Statement	Mean	Interpretation
The LCAP has become unmanageably big	4.30	Strong agreement
The LCAP is guiding/strategic	3.43	Moderate agreement
Engagement requirements meaningful/used	3.10	Neutral
Dashboard timely/actionable	2.74	Slight disagreement
LCAP influences student outcomes	2.63	Slight disagreement

Note: Friedman test confirms significant differences ($\chi^2=626.0$, $p<0.001$)

While administrators strongly agree that the LCAP has become unmanageably large (4.30), they express skepticism that it influences student outcomes (2.63), suggesting the document has evolved into a compliance exercise with little proportional value.

8. Conclusion

A decade after the LCFF promised to reduce administrative tasks, the evidence tells a sobering story. By nearly every measure, compliance requirements have grown while their perceived value has declined. When administrators strongly agree that the LCAP has become unmanageably big (4.30) while expressing doubt that it influences student outcomes (2.63), the system has lost balance.

