



California Association of Pupil Personnel Administrators (CAPPA) • California Association of School Counselors (CASC) • California Association of School Psychologists (CASP) • California Association of Supervisors of Child Welfare and Attendance (CASCWA) • California Association of School Social Workers (CASSW) • California School Health Centers (CSHC) • California School Nurses Organization (CSNO) • California Teachers Association (CTA) • Western Association for College Admission Counseling (WACAC) • National Association of Social Workers—California (NASWCA)

September 24, 2013

Dr. Michael Kirst, President  
State Board of Education  
1430 N Street  
Sacramento, CA 95814

**Re: Recommendations on LCFF Implementation**

Dear Dr. Kirst:

The Pupil Services Coalition (PSC), whose members represent more than 330,000 members of various California-based pupil services associations, is writing to provide input into the regulations required to implement the Local Control Funding Formula (LCFF).

These statewide organizations strongly support the intent of AB 97 to ensure that new LCFF funds are directed for the purposes outlined in Section 42238.07. This section states that the regulations shall require a school district “to increase or improve services for unduplicated pupils.” Research shows that efforts to improve school climate, safety and learning are not separate endeavors. They must be designed, funded and implemented as a comprehensive school-wide approach.

The PSC recommends that the State Board adopt regulations that make it clear that districts should prioritize the expansion of crucial support programs and services that have been reduced or that need to be expanded in order to ensure the well being and academic progress of English learners, students on free/reduced lunch and/or Foster Youth. Additionally, the PSC urges the SBE to draft the required LCFF template to ensure that districts consider in their local LCFF plans that students have access to psychological, mental health and counseling services which will improve their chances for academic improvement.

In many districts, local policies have approached safety and mental health in schools with ad hoc and piecemeal approaches. This is certainly born out with the narrow view of discipline that has resulted in very narrow laws related to student suspension and expulsion. The PSC believes that in order to ensure that all of their students flourish academically, districts must establish systems for promoting social-emotional development that helps to respond to and prevent negative behaviors and to re-engage disconnected students. This positive school environment, however, can only be established if there are mental health and counseling professionals on site to work directly with at-risk students and to establish school level programs that create and reinforce positive school cultures.

One such type of program that has shown remarkable success is Positive Behavior Intervention and Supports (PBIS) programs. PBIS is a framework for creating positive school cultures. It is not a program or a curriculum. It is a systems level change that focuses on positive behavior interventions and targeted programs that are split into three tiers. In the big picture, PBIS requires the implementation of preventative and proactive approaches to discipline and positive discipline methods.



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PBIS also changes belief systems in students, staff and the community that results in productive citizens and safer schools.

This is but one example of the positive work that districts will need to do to create the type of environment that will enable at-risk students (which definitely includes those target student populations that for which districts will be receiving supplemental and concentration grant funds). Beyond the establishment of school-wide programs, it is critical to restore the staffing levels of pupil personnel services which have been reduced during the economic recession. To make this happen, the PSC urges the SBE to draft the LCFF template so that it helps to provide a roadmap to districts about the importance of mental health services, the need to establish positive school climates and the appropriate staffing levels needed to provide these services.

Thank you for the opportunity to make recommendations on the implementation of the LCFF.

Respectfully,

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