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LOYOLA MARYMOUNT UNIVERSITY

Review of the Impact of Federal and State Turnaround Policies:

A Case Study of a District in State Receivership

by

Megan Marie Atkins

A dissertation proposal presented to the Faculty of the School of Education,

Loyola Marymount University,

in partial satisfaction of the requirements for the degree

Doctor of Education

2022

Review of the Impact of Federal and State Turnaround Policies:

A Case Study of a District in State Receivership

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by

Megan Marie Atkins

Loyola Marymount University School of Education Los Angeles, CA 90045

This dissertation written by Megan Atkins, under the direction of the Dissertation Committee, is approved and accepted by all committee members, in partial fulfillment of requirements for the degree of Doctor of Education.

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ABSTRACT

The districts that have been in receivership in the State of California have a student population categorized as socioeconomically disadvantaged. While state receivership is triggered by fiscal insolvency, the school district in receivership is not performing to state standards according to the indicators on the California Dashboard (California Department of Education, 2021a). In order to return to local control and governance by a locally elected Board of Trustees, the district must meet its financial obligations and meet and maintain the Financial Crisis and Management Assistance Team (FCMAT) review criteria. California Assembly Bill No. 1840 (Cal. 2018) shifted the power from the state level to the local county office. This shift infers that there is a difference in leadership at the state level and leadership at the local level, and suggests that more decentralized leadership, at the local level, will more effectively support the improvements necessary to move a district out of state receivership. By studying the leadership of a district governed by A.B. No. 1840 (Cal. 2018) and the impact of the decentralization of leadership of chronically failing or struggling districts, I learned the policy levers available to policymakers when this happens. The district must spend significant amounts of money to pay back loans and for costly reviews. This is money that is not going toward improving learning and school experience.

CHAPTER 1

INTRODUCTION

Over the past 50 years, our nation has spent billions of dollars on turnaround efforts of low-performing schools and districts (Backstrom, 2019). The majority of these schools and districts are found in urban, low-income neighborhoods and serve a disproportionate number of children of color (Backstrom, 2019). If we are to better serve our underserved students, we need to study the way we support persistently failing schools. According to Backstrom (2019), bold change has three criteria needed for success:

- 1. School turnaround policy must have flexibility for the individual challenge;
- 2. Schools need strong individual leaders, with the freedom to act; and
- 3. Real and lasting change requires commitment and a willingness to break from the status quo. (Backstrom, 2019)

By ensuring that schools have the right leadership who are focused on quality instruction by participating in continuous cycles of improvement, establishing high expectations, and holding all stakeholders accountable, turnaround schools and districts would begin to deliver the quality education our most marginalized communities deserve (Backstrom, 2019).

National Turnaround Efforts

In 2011, the state Department of Elementary and Secondary Education of Massachusetts used their authority and took over the Lawrence Public School district (Schueler et al., 2017). The reforms involved in the efforts were: increase expectations, increase school-level autonomy and accountability, extend learning time, improve human capital and improve data use (Schueler et al., 2017). The takeover involved bringing in external operators of charter schools (Therriault,

2016). With the charter operators, there was difficulty with recruitment, start-up and implementation, as the district had to incorporate new staff from outside the district (Therriault, 2016).

When Districts in California Fail

State receivership is defined as the district declaring a fiscal crisis and being unable to meet its multi-year financial obligations. California uses state receivership to address schools in fiscal insolvency. In California, the State Superintendent of Public Instruction assumes all legal duties, as well as the power and the rights to run the district. The district's superintendent is released from their position and the school board is moved to an advisory capacity only (Frazier, 2006). In an interview with Beth Ruyak, Caryn Moore, Director of the School Fiscal Services Division for the California Department of Education, said,

The board members become advisory only. They don't have a specific role. They don't get paid. The district superintendent is no longer there. It is the administrator that comes in and takes over. So while the administrator is working with the locals, ultimately, it's this person's decisions that kind of control the district. And the goal is to get them out of receivership. (Moore, 2019, para. 7)

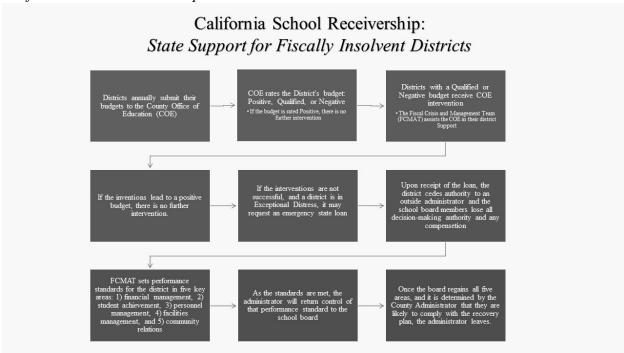
Fiscal insolvency is not only a budgetary issue, but there is a direct line that when services cannot be provided, student achievement would also be impacted (Frazier, 2006).

In 1991, The Fiscal Crisis and Management Assistance Team (FCMAT) was created as a state agency, out of legislation (Fiscal Crisis and Management Assistance Team, 2021). The mission of FCMAT is to support K-12 schools by identifying, preventing, and supporting local education agencies (LEAs) through fiscal, operational, and data management challenges by

providing assistance and professional development (Fiscal Crisis and Management Assistance Team, 2021). As a part of the operational review process by FCMAT to be released from state receivership, there are indicators that address these systems of data analysis and improved outcomes for students.

Figure 1

California School Receivership



Note: Adapted from "Analyzing Recent Changes to State Support for Fiscally Distressed Districts" by Legislative Analysts Office, 2018, in Legislative Analysts Office Report, copyright 2018 by The Legislative Analysts Office of California. https://lao.ca.gov/Publications/Report/3914

Historical Background

School District in Receivership

In 2012, the nearly insolvent School District in Receivership (referred to hereafter as "the district") was taken over by the State of California (Phillips, 2018). On September 17, 2018, A.B. No. 1840 (Cal. 2018) was passed, moving the oversight of the district from the State Superintendent of Public Instruction (SSPI) to assigning a County Superintendent who reports to

the County Office of Education Superintendent of Schools to oversee the daily operations of the district (State of California, 2018).

The School District in Receivership is located in Los Angeles County and according to the California Department of Education website, serves approximately 8000 students in 19 schools: one preschool child development center, three transitional kindergartens through grade five (TK-5) schools, seven TK-6 schools, one TK-8 school, one grades 6-8 middle school, one grades 7-8 middle school, two high schools, one district-operated charter school (TK-8), one district-operated charter school (9-12) and one career technical education/adult education/alternative education school. There are many independent charter schools also located in the district. Approximately 30.4% of the district's students are English Learners and 86% of its students are eligible for free or reduced-price meals. The district's unduplicated pupil percentage (students who are English learners, foster youth, or eligible for free or reduced-price meals) is 89.8%.

Upon entering the 9th year of receivership, in order to receive financial support from the State of California to repay its debt, the district must have had a qualified or positive budget and complete the annual Fiscal Crisis and Management Assistance Team Reviews, with scores of 6 or above in all areas (see Appendix A), maintained for 2 years (A.B. No. 1840, Cal. 2018). Because of the budget crisis, the district's salaries remain disproportionate to neighboring districts and the minimum wage is less than Los Angeles, according to the districts' Human Resources websites. These salary issues make it difficult to recruit and retain staff and have rendered the district dependent on high priced private vendors to perform the work to maintain the district (Blake et al., 2019).

District Leadership

In November 2019, under the new leadership of the county administrator, the district is committed to fulfilling A.B. No. 1840 (Cal. 2018) and returning the school district to local control. To support the district, the County Office of Education funded, in part by the California Collaborative for Education Excellence (CCEE), a team of experts to assist in identified content areas based on the FCMAT annual report to build capacity and develop systems and procedures to ensure consistency of operations: academic instruction, student services, operations, data management and special education.

On September 17, 2018, Governor Newsom signed into law A.B. No. 1840 (Cal. 2018) out of the Committee on Budget, Education Finance. This assembly bill impacts four school districts: Inglewood Unified School District, the Oakland Unified School District, the South Monterey County Joint Union High School District, and the Vallejo City Unified School District. These districts were included in this assembly bill because they were either in state receivership or at risk of becoming in state receivership (State of California, 2018).

One of the major highlights of the bill was that it moves the leadership of a district in receivership away from the state level to more local control. Previous responsibilities that were assigned to the Superintendent of Public Instruction (SPI) was assigned to the Local County Office of Education County Superintendent, with broad oversight by the SPI and the president of the State Board of Education. And while this bill was developed by the department of finance because of the districts' financial insolvency, the bill did not change the criteria for fiscal insolvency but shifts the administration of such districts.

When reviewing the FCMAT operational review that is one of the two components set forth by A.B. No. 1840 (Cal. 2018), the majority of the items included the establishment of consistent processes throughout the district (Fiscal Crisis and Management Assistance Team, 2019). By creating and adhering to written policies, there was an attempt to create coherence throughout the district. Honig and Hatch (2004) defined crafting coherence as

schools setting school-wide goals and strategies that have particular features; schools using those goals and strategies that have particular features; schools using those goals and strategies to decide whether to bridge themselves to or buffer themselves from external demands; and school district central offices supporting these school-level processes. (p. 1)

While A.B. No. 1840 (Cal. 2018) has brought new leadership to the district through the County Administrator, the FCMAT Systemic Review Process called on the district leadership to build the infrastructure and capacity of the district staff.

Statement of the Problem

Of the districts that have been in receivership in the State of California, all nine have had 66.5%, or higher, of their student population categorized as socioeconomically disadvantaged, with five of the nine having a student population of 86.6%, or higher, socioeconomically disadvantaged (California Department of Education, 2021b). It is hard to separate state receivership and high poverty districts. These students deserve nothing but the best, but when the district is spending significant amounts of money to pay back loans and for costly reviews, this is money that is not going to children to improve their learning and school experience.

While state receivership is triggered by fiscal insolvency, the school district in receivership is not performing to state standards according to the indicators on the California Dashboard (California Department of Education, 2021a). In order to be removed from state receivership, the district in receivership must meet its financial obligations and meet and maintain FCMAT review criteria. This will allow for the district in receivership to return to local control and governance by a locally-elected board of trustees. California's A.B. No. 1840 (Cal. 2018) shifts the power from the state level to the local county office. This shift infers that there is a difference in leadership at the state level and leadership at the local level, and suggests that more decentralized leadership, at the local level, will more effectively support the improvements necessary to move a district out of state receivership. By studying the leadership of a district governed by A.B. No. 1840 (Cal. 2018) and the impact of the decentralization of leadership of chronically failing or struggling districts, I learned the policy levers available to policymakers when this happens. By studying a district currently governed by this more decentralized model of receivership, as outlined by A.B. No. 1840 (Cal. 2018), and whose recent past included the more centralized model of receivership by the state, the district provides an important case study in the different dynamics at work in implementing improvement plans under the two models.

Research Questions

The over-arching research question for this study was this: How has the passage of A.B. No. 1840 (Cal. 2018) impacted the transformation of a school district that has been in receivership under state oversight and moved to the local county office of education oversight? Sub-questions are as follows:

- What is the focus of the various stakeholders involved in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- What is the structure of the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- What are the supports put in place in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- Which policy levers for change have been most successful in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?

Purpose and Social Justice Significance of the Study

The purpose of this case study was to identify lessons to be learned by decentralizing leadership of districts in receivership to the county level, rather than the state. Because there would inevitably be districts that struggle financially and academically, and would require intervention of some kind, this is not an issue that will go away, and because there is only one district currently in local receivership, the information gathered in this research will help guide the leaders making future decisions about receivership and intervention strategies with failing districts, as well as potentially supporting district leaders as they develop strategies for improvement.

This research aimed to address the social justice implications of policy-related districts in receivership, and the impact on students, communities, and lower income communities.

California's A.B. No. 1840 (Cal. 2018) is new legislation that supports school districts. Out of those five school districts, only one is currently under state receivership. But by studying the decentralization in leadership in one district, there are lessons that can be learned and applied to

the other three districts currently covered by A.B. No. 1840 (Cal. 2018), in addition to any districts who may be in state receivership in the future. This is a unique time to conduct this research, as the current Board of Education and the most recent retired state and county administrator were in their positions both before and after A.B. No. 1840 (Cal. 2018). By researching their experience, one can have a firsthand accounting of the shift toward decentralization.

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While A.B. No. 1840 (Cal. 2018) has brought new leadership to the district through the county administrator, the FCMAT Systemic Review Process calls on the district leadership to build the infrastructure and capacity of the district staff (Financial Crisis Management and Assistance Team, 2013).

Conceptual Framework

This research set out to conduct a case study of a district in state receivership. Through the study, I considered the *structures* that are in place to support the transformation, including how the district office and county support teams are organized, and the communication mechanisms that are used to communicate these supports to schools and the community. This research studied the *focus of the work* called for in A.B. No. 1840 (Cal. 2018), by considering the priorities of the district office team and the interactions and supports that are provided to the schools in order to support the growth in compliance with A.B. No. 1840 (Cal. 2018), and ultimately improve teaching and learning for the community of the district in receivership. This research examined the *supports* and policy levers for change that are used, and the guidance and direction they provide. And lastly, I learned the *evidence or information base* used by the leadership team to guide their work and reflection as they lead schools through the transformation out of state receivership.

Coherence

Coherence is not simply aligning to the objectives of a policy, but the dynamic process of schools and districts continually adapting between the external demands and the school's own goals, leading to improved student outcomes (Honig & Hatch, 2004). I considered the intent of the federal and state policies, as well as the implementation at the district and school level, considering the will and capacity at all levels.

In the case of school district in receivership, and other districts in receivership in California, processes such as the FCMAT Systemic Reviews create district-level coherence (Fiscal Crisis and Management Assistance Team, 2013). Under Dr. Torres's leadership,

according to FCMAT, district in receivership must provide opportunities for professional development in best practices for all divisions and set the framework for goal setting and strategy (Honig & Hatch, 2004).

Fullan and Quinn (2016) defined coherence as "the shared depth of understanding about the nature of the work. In other words, it is fully and only subjective" (p. 30). Coherence is not checklists, but it is in the minds of people and developed within groups (Fullan & Quinn, 2016). In order to achieve coherence, there must be purposeful interaction amongst members of the organization, making meaning over time (Fullan & Quinn, 2016).

Organizations change. Staff members come and go, policies change, the environment changes, so it is up to the coherence makers to eliminate any unnecessary distractions (Fullan & Quinn, 2016). According to Fullan and Quinn, coherence has three features:

- 1. It is about the whole system, school or district;
- 2. It focuses in on pedagogy and effective teaching and learning practices; and
- 3. It always examines the measurable progress for student outcomes. (Fullan & Quinn, 2016)

Fullan and Quinn have developed a coherence framework with four essential components; these components are not linear, but each of the four impacts the other three (Fullan & Quinn, 2016). the leader not only activates the components but is also the connection between them (Fullan & Quinn, 2016).

Figure 2

Coherence Framework



Note. From "Coherence Making: How School Leaders Cultivate the Pathway for School and System Change with a Shared Process," by M. Fullan and J. Quinn, 2016, in School Administrator, pp. 30-34, copyright 2016 by Corwin Press. https://www.scoe.org/files/Fullan_Quinn.pdf. Reprinted with permission.

One component of Fullan and Quinn's (2016) model is *focusing direction*. Leaders must have a clear understanding of their deep moral purpose (Fullan & Quinn, 2016). This means that it is important to reduce the focus to only two or three goals, with clear strategies to reach them (Fullan & Quinn, 2016). But having the goals is not enough, it is also critical to have change leadership (Fullan & Quinn, 2016). The leader set the directional vision, and then collaboratively, the team would build the purposeful actions (Fullan & Quinn, 2016).

The second component is *cultivating collaborative cultures* (Fullan & Quinn, 2016). It is up to the leader to establish a "nonjudgmental culture of growth" (Fullan & Quinn, p. 33). In this environment, it is acceptable for the team to make mistakes, as long as they are working on the established goals and learn from their actions (Fullan & Quinn, 2016). According to Fullan and

Quinn (2016), "Coherence becomes a function of the interplay between the growing explicitness of the idea (as leaders focus direction) and the change culture that promotes learning from the work" (Fullan & Quinn, 2016, p. 33).

The third component is *deepening learning* (Fullan & Quinn, 2016). In this quadrant, there is a deep commitment to the teaching and learning connection (Fullan & Quinn, 2016). This process is not quick but involves examining instructional practices and the impact on student outcomes (Fullan & Quinn, 2016).

The final component is *securing accountability* (Fullan & Quinn, 2016). The idea is not to be led by external accountability, but to focus on internal accountability to lead to success in the external accountability framework (Fullan & Quinn, 2016). This internal accountability includes: "specific goals, transparency of practice and results, non-judgmentalism, commitment to assessing impact, acting on evidence to improve matters, and engagement in the state accountability system" (Fullan & Quinn, 2016, p. 34). In order to build this internal accountability, the leader must build the capacity of the team (Fullan & Quinn, 2016).

According to Fullan and Quinn, the main goal of the leader is to build this collaborative culture of coherence and for the junior members of the leadership team to learn how to lead this work. This was challenging work, but leads to student success in measurable outcomes (Fullan & Quinn, 2016).

Honig and Hatch (2004) also see coherence as not a checklist, but a process. They defined coherence as "a process, which involves school and school district central offices working together to craft or continually negotiate the fit between external demands and schools' own goals and strategies" (Honig & Hatch, 2004, p. 1). Honig and Hatch have found that most

research on educational policy frame the problem of incoherence from the lens of having multiple external demands competing on a school's funding, time, and attention, leading to lack of teaching and learning, staff turnover, and poor student performance (Cohen, 1982; Elmore, 1995; Fuhrman, 1999).

However, other research has shown that these multiple demands can lead to opportunities for improvement (Honig & Hatch, 2004). Honig and Hatch argued that the traditional model of focusing on schools and central offices using the external demands to strengthen student performance ignores the political and subjective realities of the actual implementation of the policies, which leads to unrealistic goals (Honig & Hatch, 2004). Instead, Honig and Hatch (2004) argued that coherence is a process in which school and central office leaders find ways to accommodate the fit between the external demands and the school's own goals and objectives. During this study, I studied those accommodations made in the process of implementing A.B. No. 1840 (Cal. 2018).

Similar to the work of Fullan and Quinn (2016), authors Honig and Hatch (2004) saw the work of coherence as a social construct between all stakeholders. To accomplish this, Honig and Hatch laid out three steps in the process: development of schoolwide goals and strategies; the school leveraging the external demands to advance these goals and strategies; and central offices working with the schools to support these processes (Honig & Hatch, 2004). In order to create these goals, Honig and Hatch suggested three activities in which schools can engage: "(a) creating collective decision-making structure; (b) maintaining collective decision-making structures, and (c) managing information" (Honig & Hatch, 2004, p. 21). They depict both a search for and use of bridging and buffering between schools and the central office. The

bridging components are schoolwide goals and strategies as simplification systems. The buffering activities are (a) decision-making structures, (b) maintenance activities, and (c) knowledge utilization.

As schools interact with the external demands, they must engage in a process of bridging and buffering (Honig & Hatch, 2004). Bridging activities invite or increase interaction with external demands and buffering activities limit those interactions (Honig & Hatch, 2004). One way to bridge demands is to leverage those external demands to advance internal goals (Honig & Hatch, 2004). On the opposite end, schools may buffer themselves from external demands in strategic and limited ways (Honig & Hatch, 2004). This allows the organization to focus without being impacted by negative feedback (Honig & Hatch, 2004). An organization may also engage in a hybrid process of both buffering and bridging by adopting the external demands in a symbolic gesture, but not allowing them to impact the day-to-day operations (Honig & Hatch, 2004).

Creating coherence in a dynamic process that is dependent on the interaction of all stakeholders and a focus on limited, strategic internal goals (Fullan & Quinn, 2016; Honig & Hatch, 2004). It is a process that takes time and leaders who are willing to participate in a highly collaborative environment, with the ability to manage the internal and external demands (Fullan & Quinn, 2016; Honig & Hatch 2004).

Loose and Tight Coupling

Schools and school districts exhibit both loose and tight couplings (Weick, 1982, as cited in Fusarelli, 2002). Historically, schools have been an example of loose coupling, as rules are often violated, and the policy is unclear (Fusarelli, 2002). As the states try to move toward more

coordination of policy, they are creating a tighter coupling (Fusarelli, 2002). The educational policy of the nineties was an attempt to tighten up the loose system by imposing external pressure on low-performing districts (Fusarelli, 2002). The goal was to create a more coherent education policy with the goal of improving student outcomes (Fusarelli, 2002). According to Weick and Sutcliffe (2001) loosely coupled systems serve as "an attempt to reintroduce some indeterminacy into conventional portraits of systems" (p. 384). It was Fusarelli's (2002) belief that this loosely coupled system leads to the uneven implementation of policy.

Fusarelli does not see the more tightly coupled policies as a top-down only approach (Fusarelli, 2002). In order to have successful reform, the strategies must be both top-down and bottom-up (Fusarelli, 2002). The building of capacity is essential to sustain any reform initiatives (Fusarelli, 2002). In this study, I studied the way the policy was implemented.

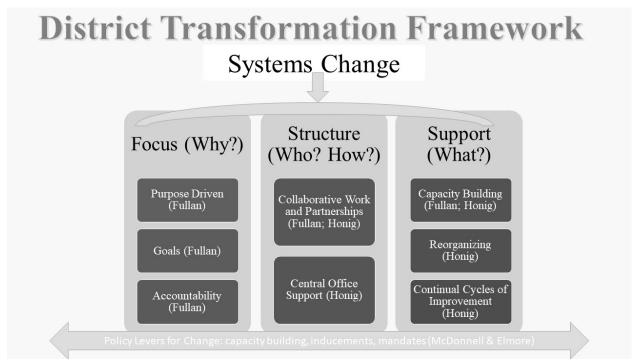
Alternative Policy Instruments

Lorraine M. McDonnell and Richard F. Elmore (1987) proposed a framework for looking at alternative policy instruments. This conceptual framework uses four classes of instruments: (a) *mandates*, rules governing the actions, (b) *inducements*, transfer of money to support the policy, (c) *capacity-building*, transfer of money to invest in material, human, or intellectual resources, and (d) *system-changing*, official transfer of authority (McDonnell & Elmore, 1987). Under A.B. No. 1840 (Cal. 2018), all four of these instruments are used. The goal of the policy analysis was to be able to answer the question, "Under what conditions are different instruments most likely to produce their intended effect?" (McDonnell & Elmore, 1987, p. 134). There are two factors that lead to which instrument was chosen: how the problem for which the policy is designed is defined and the resources, or lack thereof, the current policymakers are faced with (McDonnell

& Elmore, 1987). I have combined the works of Fullan and Quinn (2016), Honig and Hatch (2004), and McDonnell and Elmore (1987) to create a new conceptual framework, the district transformation framework (DTF).

Figure 3

District Transformation Framework



Note: Adapted from "Coherence: The Right Drivers in Action for Schools, Districts, and Systems," by M. Fullan and J. Quinn, 2015, copyright 2015 by Corwin Press; "Coherence Making: How School Leaders Cultivate the Pathway for School and System Change with a Shared Process," by M. Fullan and J. Quinn, 2016, in School Administrator, pp. 30-34, https://www.scoe.org/files/Fullan_Quinn.pdf., copyright 2016 by School Superintendents Association; "Supervising Principals for Instructional Leadership: A Teaching and Learning Approach," by M. I. Honig and L. R. Rainey, 2020, copyright 2020 by Harvard Education Press; "Crafting Coherence: How Schools Strategically Manage Multiple, External Demands," by M. I. Honig and T. C. Hatch, 2004, in Educational Researcher, 33(8), pp. 16-30, https://doi.org/10.3102%2F0013189X033008016 copyright 2004 by American Educational Research Association; and "Getting the Job Done: Alternative Policy Instruments," by L. M. McDonnell and R. F. Elmore, 1987, in Educational Evaluation and Policy Analysis, 9(2), pp. 133-152, https://doi.org/10.3102%2F016237370090 02133, copyright 1987 by American Educational Research Association.

In order to analyze this work, I used the district transformation framework (DTF), a conceptual framework developed through the intersection of the work by Fullan and Quinn (2016), Honig and Hatch (2004), and McDonnell and Elmore (1987). I feel that it is important to look at both, as Honig and Hatch's (2004) dimensions are about the *focus* of the work—support

to schools and improved teaching and learning—and *structure*- reorganizing. Fullan and Quinn's (2016) work on coherence also looks at the structure, collaboratively, and the *what*, the deeper learning and capacity building of the team. I analyzed all the supports by looking at four policy levers for change: providing resources and training (capacity building), inducements (incentivizing participation and action), mandates, and systems change (McDonnell & Elmore, 1987).

The first pillar of the DTF is *focus*. When one is starting transformation, it is important that all stakeholders are clear on the *why*. Each member should define their purpose and their goals within the transformation, as well as how they hold themselves and others accountable (Fullan & Quinn, 2016). I would argue that while there may be a policy that defines the *why*, each stakeholder at each level of the organization may have their own focus. It is important for one to know their own focus, as well as others. By understanding each other's focus, one should have a better understanding of the policy levers used to motivate the change.

Once the focus of the transformation has been identified, the second pillar of the DTF is *structure*. This pillar helped to shape and define who would do the work, and how it would be done. It is important that this work is not done in isolation, but that it is collaborative and done in partnership with others (Fullan & Quinn, 2016). In the case of district transformation, it is extremely important to focus on the role of the Central Office in its support of the school sites (Honig & Rainey, 2020). As the principals are the school site change-agents, the district office must be seen as a supportive partner (Honig & Rainey, 2020).

The third pillar of the DTF is *support*. It was important that all levels of the organization defined what they would be doing to support the transformation process. How would each

member build the capacity of those whom they support (Honig & Rainey, 2020)? How would the organization be reorganized and re-cultured to support the schools and the focus (Honig & Rainey, 2020)? What would be the evidence of the continuous cycles of improvement of the work and the relationships with schools (Honig & Rainey, 2020)? Along each step of transformation, it is important to acknowledge and recognize what lever for change is necessary: capacity building, inducements, mandates, or systems change while also noting that this may be different for each stakeholder group (McDonnell & Elmore, 1987).

Methodology

This research study was a case study. A case study looks at a particular phenomenon (Mills & Gay, 2019), and in this case, it is the leadership and strategies in a school district that is in receivership. In case studies, the researcher must triangulate the data through multiple sources (Mills & Gay, 2019). I provided details about the participants, setting, data collection, and analysis plan. This triangulation occurred through interviews (FCMAT, California Collaborative for Educational Excellence, SSPI, County Superintendent, County Office of Education Superintendent, members of the County Office of Education district support team, district employees), historical review of FCMAT operational review outcomes, and documents created according to A.B. No. 1840 (Cal. 2018). The researcher compared and contrasted patterns related to the district leadership in hopes of creating generalizations that can be applied to leadership of other districts in, or at-risk of being in, state receivership.

Organization of Dissertation

This dissertation has five chapters. In this first chapter, I have provided an introduction and a background for my research. I have given my statement of the problem, research question,

the purpose of the study, the theoretical framework, as well as the methodology which I used. In the second chapter, I will provide a review of the literature I researched in order to develop this study. The third chapter will give a description of the methodology, reviewing my research design and the methods used to conduct the research. In the fourth chapter, I will present the research and provide the results of the work. And in the final chapter, I will provide a discussion of the summary, implications, and conclusions.

CHAPTER 2

LITERATURE REVIEW

This study aimed to review and explore federal and state turnaround policies for school districts and the decentralization of leadership by A.B. No. 1840 (Cal. 2018) for one school district that has been in state receivership for many years, both under a more traditional state receivership and more recently, a decentralized model of receivership. As such, this literature review begins with a discussion of loose and tight coupling as an example shift between centralized and local control. It will continue with an overview of education policy related to school finance and school turnaround in the United States and accountability policy research in the public sector. The research continues to include a discussion of California education policy related to school finance and school turnaround. This review will specifically analyze the ways that A.B. No. 1840 (Cal. 2018) takes a different approach from prior policies and the state agencies and supports included within the policy. This review then explores the historical context of one school district in state receivership and the supports that are available to a "failing district." Next, this research will use a critical policy analysis lens and a theoretical framework of coherence. Finally, the review ends with a discussion of the current outcomes of the policy and of the decentralization of leadership by A.B. No. 1840 (Cal. 2018).

Federal Educational Policy

Federal support for U.S. public education can be dated back to 1867 when the Department of Education was created (U.S. Department of Education, 2021).

Elementary and Secondary Education Act of 1965

The Elementary and Secondary Education Act of 1965 (ESEA; 1965) earmarked federal resources to schools to support all children having equal access to education (U.S. Department of Education, 2012). However, up until the 1970s, the funding and operation of schools was a local responsibility with little intervention from the states (Jochim, 2016). It was not until the 1990s that our nation saw states exerting their authority over districts in an effort to bring about improvement (Jochim, 2016). In 1994, the Improving America's Schools Act (1994) was the first time we saw federal policy requiring states to develop plans for their lowest-performing schools (U.S. Department of Education, 2012). These low-performing schools were characterized by having few students meeting state benchmark standards, including high school graduation rates. The majority of these districts have been in cities' most impoverished areas (U.S. Department of Education, 2012).

No Child Left Behind Act of 2001

The No Child Left Behind Act of 2001 (NCLB; Library of Congress, n.d.) set forth requirements for states and districts to establish ambitious turn around plans for failing schools (Brady, 2003). The goal of this Act was to provide high-quality education to every child in America (Brady, 2003). NCLB (2001) set out interventions that were recommended in order to make changes in school improvements.

Brady (2003) offered five assumptions behind the development of NCLB (2001). The first assumption is that all schools can succeed. The second assumption is that there is something missing, or amiss in a school, and if it were corrected in the school would have success.

However, this assumption assumes that the school or the district is open to the change. The third

assumption is that the intervening body, whether it be the school. The district or the state has the ability to improve what the school or district is lacking. The fourth assumption is that the current school or district has the skills for success. They just do not know how to achieve that success, and a fifth assumption is that the leadership has the will to improve.

These interventions were determined by imagining what schools should look like, and then how districts and states could bring failing schools to that image (Brady, 2003). For example, some of the district interventions included developing or revising a school improvement plan, instituting a new curriculum, and turning over the operation of the school to the state (Brady, 2003). At the state level, some of the recommendations were to promote parental involvement in the district, differ funds, reduce district administrative funds, or replace the superintendent and school board (Brady, 2003).

Brady's (2003) research concluded that there have been some turnaround efforts that have improved schools. However, he also determined that success is not the norm. Only about 50 percent of the interventions produced positive outcomes. Brady also determined that no particular intervention type was more successful than another. Brady concluded that the standard cost benefit analysis may be misplaced. In this process, the strongest interventions carry high political and financial costs. Brady found that school leadership is the most common thread with successful turnarounds. The stronger the intervention, the more difficult and costly it is. The majority of decision makers accept failure, rather than intervene. Criticism should be reserved for those who have failed to act, rather than those who had the initiative to act, and did not succeed. The interventions that are implemented and successful or not discrete acts, but packages of implementations and interventions (Brady, 2003).

However, these interventions are hard to sustain. These interventions are unpredictable and are not consistent in every situation (Brady, 2003). Brady determined that it was not to this specific intervention strategy that is important but having the right mix of people. The energy, timing, and school leadership that contribute to the success of a failing school or district. Another employment implication of his research is that it will take time. He urged leadership to stick around and not pass judgment too quickly. Overall, Brady was positive about the possible outcomes of NCLB (2001), in hopes that it would lead to the desired outcomes.

Every Student Succeeds Act

As with NCLB (2001), Every Student Succeeds Act (ESSA; 2016) required states to identify their struggling schools, and with the support of federal funding, implement evidence-based practices to bring about success (Schueler et al., 2017). However, under ESSA, the states received more latitude in the process, and with less hands-on oversight by the U.S. Department of Education (Plans, 2015). Annually, the states must submit their accountability plans to the Department of Education (Plans, 2015). Under ESSA (2016), states have the ability to select their own goals as long as they address proficiency in tests, English-language proficiency, and graduation rates (Plans, 2015). These goals must have the expectation that those groups that are the furthest behind were able to close the achievement gaps and graduation rates (Plans, 2015).

The Every Student Succeeds Act (2016) requires an accountability system that must incorporate at least four indicators, three of which could be proficiency on state tests, English-language proficiency, plus some other metric that can be broken out by subgroups that would lead to growth on state tests (Plans, 2015). States also must include an indicator of the "softer skills" such as student engagement, educator engagement, access and completion of advanced

coursework, postsecondary readiness, school climate/safety or any other indicator that the state feels are important (Plans, 2015). In addition, as a stand-alone, and not a separate indicator, the state must determine an appropriate participation rate in state tests (Plans, 2015). If a school has less than 95 percent, then that must be included (Plans, 2015).

As with past national education policy, ESSA does require that states identify and reconcile the bottom 5% of school performers, at least once every three years (Plans, 2015). With state monitoring, districts must work with schools and staff to develop evidence-based improvement plans (Plans, 2015). Additionally, there is a call for a comprehensive improvement plan for schools where subgroups are chronically underperforming, despite school and district intervention (Plans, 2015). The School Improvement Grant has been consolidated into the Title I funding, and now states can use up to 7% of their Title I funds for school improvement, an increase from 4% (Plans, 2015).

Accountability Policy

Most research on accountability policy has focused on the effects of the initiatives on student achievement (Spillane et al., 2002). Accountability policy initiatives include at least two components: specific student performance outcomes and rewards and sanctions for schools (Spillane et al., 2002). Spillane et al.'s (2002) research concluded that it is important to understand the role of school leaders in the process as not only does the policy shape the school, but the school leader shapes the policy implementation as the implementing agent and agency. School leaders are the intermediaries between teachers and the district office, and therefore must gain and maintain legitimacy with both (Spillane et al., 2002). When the stakes are high, school

leaders can use the district accountability measures to help transform practices in a particular way (Spillane et al., 2002).

The high-stakes accountability of NCLB (2001) also led to the development and the adoption by many states of the Common Core State Standards (CCSS) (Coburn et al., 2016). The emphasis on high-stakes accountability led to a slight increase in student achievement, however, it failed to emphasize *how* the teachers teach (Coburn et al., 2016). Coburn et al. (2016) made note of other scholars' work on the way accountability policy has attempted to force or induce changes through mandates, initiatives, and sanctions (e.g., Achinstein & Ogawa, 2006; Desimone et al., 2007; Hallett, 2010).

Out of this reform era, Coburn et al. (2016) made two findings. First, state and federal policy can influence instructional practice, most pronounced in the areas that are tested (Coburn et al., 2016). And two, local implementation of state and federal policy depends on the alignment of these policies with the district policies and the support provided to the teacher's learning and compliance with the policy (Coburn et al., 2016). When there is strong alignment with instructional guidance and teacher support and strong accountability, there would be more substantive implementation of policy (Coburn et al., 2016)

Policy Implementation

When it comes to policy implementation, people do not always implement the policy as told or do what is necessary to maximize the outcomes (McLaughlin, 1987). In 1973, Pressman and Wildavsky were the first analysts that showed that implementation of policy dominated the outcome of the policy (McLaughlin, 1987). The success of the policy is dependent on those who

are responsible for interpreting and enacting the policy (McLaughlin, 1987). Policy does not have the ability to mandate what matters to leaders (McLaughlin, 1987).

Motivation and will are outside of the policy's reach (McLaughlin, 1987) Weatherley and Lipsky (1977) defined the term "street-level bureaucrats" as those who "interact daily with citizens in the course of their jobs and have substantial discretion in the execution of their work" (Weatherley & Lipsky, 1977, p. 172). The quality of the individual responses, the street-level bureaucrat, will impact the quality of the policy implementation (McLaughlin, 1987). However, when it comes to policy implementation, one cannot focus only on the street-level bureaucrat, as much of policy would be lost if we only considered what can be easily and readily accommodated (Weatherley & Lipsky, 1977). By focusing only at the state level would ignore the role of those implementing the policy and the social impact (Weatherley & Lipsky, 1977). For the purpose of this study, I studied not only the policy, but those responsible for the implementation.

Turnaround Policy

For decades, policymakers have made it a goal to improve resources and conditions of the schools for children living in poverty (Redding & Nguyen, 2020). And while school turnaround has emerged as a strategy for these chronically underperforming schools, it is not without controversy (Redding & Nguyen, 2020). Redding and Nguyen (2020) defined turnaround as "the identification of low-performing schools with the goal of making drastic changes to the organization, staffing and governance of schools to improve student outcomes" (Herman et al., 2008).

School turnaround hopes to influence student outcomes in four ways: improved organizational performance, changes in human capital, changes to governance and management, and improved student outcomes (Redding & Nguyen, 2020). There have been two defining practices of school transformation: implementing practices to improve organizational performance and replacing the principal (Redding & Nguyen, 2020). These improved practices often include using data to inform teaching and learning, increased teacher technology, ongoing professional development based on student needs, and the use of benchmark assessments (Redding & Nguyen, 2020). One of the most important factors in school turnaround is the collaboration of highly effective teachers and leaders (Le Floch et al., 2016). When it comes to leadership, it is important to have a leader who is characterized as transformative and can motivate the staff toward the shared vision (Redding & Nguyen, 2020). In addition, it is important for the leader to define and solve problems, develop solutions to the problems of practice, have perseverance, and demonstrate a commitment to student learning (Redding & Nguyen, 2020).

In the research of Redding and Nguyen (2020), the researchers found that school turnaround showed limited student test score improvement the first year, but saw increases over the second, third, and fourth years. The research was not conclusive on whether a staff reconstitution or replacement of the principal would create meaningful change (Redding & Nguyen, 2020). Instead, it suggested that improved organizational operations and human capital lead to positive student outcomes (Redding & Nguyen, 2020).

Redding and Nguyen (2020) concluded that working to improve low-performing schools rather than close them is worthwhile. There are increased benefits to student achievement that

should be weighed against the disruption that school closures bring to districts and communities (Redding & Nguyen, 2020). Additionally, management changes have the potential to bring about larger student achievement gains, however, they are not necessary in the lowest performing schools (Redding & Nguyen, 2020).

Crafting effective districts and effective schools requires many approaches, and there is not one-size-fit-all (Zavadsky, 2013). The goal of any strategy should be to create the drive and the will to bring about the necessary change, provide flexibility for individual situations, and build capacity of all those involved to leverage the player's own innovation (Zavadsky, 2013).

California Educational Policy

Local Control Funding Formula

In 2013, California began using a new school funding formula, the Local Control Funding Formula (LCFF; Willis et al., 2018). There are three major components to this new funding. First, this formula shifted the funding from being mostly based on categorical programs, to providing additional funds for students who have been identified as having the most educational needs, also known as "unduplicated students," low-income students, English learner (EL) students, and foster youth (Willis et al., 2018). Second, the LCFF required that each school district engage stakeholders to develop a planning document, the Local Control and Accountability Plan (LCAP; Willis et al., 2018). And third, the LCFF led to the state's creation of the California School Dashboard, which publicly displays school and district performance indicators (Willis et al., 2018).

While California had LCFF in place, ESSA (2016) provided for a pilot weighted student-funding program for 50 districts to try combining local, state, and federal funds to support low-income students and those with disabilities (Plans, 2015).

Local Control Accountability Plan

The Local Control Accountability Plan (LCAP) is a document that is intended to project how a district plans to allocate their resources to meet their prioritized goals (Willis et al., 2018). In addition to prioritizing funds, the LCAP also includes indicators of how a district monitors their progress and how they use the data to inform their decisions (Willis et al., 2018). The requirements of the LCAP are such that districts must provide justifications for how they spend their money for their most high-needs groups (Willis et al., 2018). Both the LCFF and the LCAP require high levels of stakeholder input, including parents, community members, and advocacy groups (Willis et al., 2018).

Willis et al. (2018) conducted interviews with chief business officers (CBO). In general, the CBOs support the shift to the LCFF, with 68% making a particular note of increased equity and 50% making note of local control as the key purposes (Willis et al. 2018). And nearly every CBO interviewed noted the importance of their learning and collaboration with the county office of education in relation to the LCFF and the LCAP (Willis et al., 2018). These interview findings also suggested that the state-to-local shift has already been underway within the school finance leaders (Willis et al., 2018).

In addition to this funding shift, in 2017, California implemented a new accountability plan, the System of Support program, to support all districts, but particularly those in which assistance was needed due to poor student outcomes (Willis et al., 2018).

California Turnaround Policy

The California Collaborative on District Reform was formed in 2006 as an initiative of the American Institutes for Research (Knudson et al., 2011). This organization is a collaboration between researchers, practitioners, policymakers, and funders to improve teaching and learning for the students in California (Knudson et al., 2011). A study conducted on eight districts who were improving their lowest-performing schools found two lessons: long-term and widespread turnaround requires systemic changes at the school and district level and the approaches must be customized for each specific school (Knudson et al., 2011).

In California, state receivership is defined as the district declaring a fiscal crisis and is unable to meet its multi-year financial obligations. The State Superintendent of Public Instruction assumes all legal duties, as well as the power and the rights to run the district. The district's superintendent is released from their position and the school board is moved to an advisory capacity only (Frazier, 2006).

Assembly Bill 1200

According to the California Department of Education (2016) website, A.B. 1200 (Cal. 1991) arose out of concerns about the bankruptcy of the Richmond School District and was signed into law in 1991. A.B. 1200 (Cal. 1991) provided a system of fiscal accountability, including FCMAT and increased oversight and support by the California Department of Education and County Offices of Education, for school districts and county offices to prevent bankruptcy for districts. Funding for A.B. 1200 (Cal. 1991) County Office of Education Fiscal Oversight has been allocated for County Office of Education (COE) discretional use every year for distribution to COEs since the passage of A.B. 1200 (Cal. 1991) until 2013-2014 when

funding for this program was included in the local control funding formula. These funds can be used for increased personnel and services to support districts in receivership.

Senate Bill 533

On September 14, 2012, Governor Jerry Brown approved the Senate bill S.B. 533 (Cal. 2012), which brought the district under state receivership with a state-approved emergency loan of \$55 million to attempt to hold off fiscal insolvency.

Assembly Bill 1840

As of July 1, 2018, the California Department of Education (2018) reported that the district owed \$24,279,726. The payment schedule is approximately \$1.8 million due each November through 2033.

On September 17, 2018, Governor Newsom signed into law A.B. No. 1840 (Cal. 2018) out of the Committee on Budget, Education Finance, changing from the previous state-centric policy to be more in alignment with local control (Office of Governor, 2022). This assembly bill impacts four school districts: Inglewood Unified School District, the Oakland Unified School District, the South Monterey County Joint Union High School District, and the Vallejo City Unified School District. These districts are included in this assembly bill because they are either in state receivership or at risk of becoming in state receivership (State of California, 2018). A.B. No. 1840 (Cal. 2018) established Educational Code Section 42161, which states:

a. For the 2018–19 fiscal year, the School District in Receivership shall do both of the following:

- Meet the requirements for qualified or positive certification for the school district's second interim report pursuant to Article 3 (commencing with Section 42130) of Chapter 6.
- c. Complete comprehensive operational reviews (see Figure 1) that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability. (sec. 42161)

One of the major highlights of the bill is that it moves the leadership of a district in receivership away from the state level to more local control. Previous responsibilities that were assigned to the Superintendent of Public Instruction (SPI) are now assigned to the Local County Office of Education County Superintendent, with broad oversight by the SPI and the president of the State Board of Education. And while this bill is developed by the Department of Finance because of the districts' financial insolvency, the bill does not change the criteria for fiscal insolvency but shifts the administration of such districts.

Conclusion

It is clear from this review that school reform at the federal, state, and local level has been around for centuries. There have been policies throughout the years at all levels to address the needs of the lowest-performing schools, many of which have high rates of poverty and English learning students. And throughout the years, the policies have shifted from loose to tight to loose couplings, with top-down, to local decisions and mandates in an attempt to address accountability issues for performance through different approaches.

What is also clear from the research is that there is not a blueprint for how to do this work. Strategies and approaches vary in each new setting and environment. However, the research leads to the importance of the school level staff and their will and capacity to implement the policy given to them. It is also clear that in order to increase student achievement in underperforming districts, authentic data must be used to drive the teaching and learning. And the capacity and the will of the teachers to use this data is an investment worth making.

At the national level, NCLB (2001) was a top-down, tightly coupled prescriptive approach to turnaround with a menu of 31 interventions designed to improve student achievement (Brady, 2003). ESSA, a more loosely coupled reform policy, gives more latitude to the states and allows them to select their own goals, with some parameters (Plans, 2015). As the Nation has moved to more local control with the shift of NCLB (2001) to ESSA, California has made a similar shift with school funding, LCFF and LCAP, and with the passage of A.B. No. 1840 (Cal. 2018), the state receivership Process. In addition to the substantive requirements of the policies, the research also revealed that the will and capacity of the leadership and the "street-level bureaucrat" can influence the impact of the policy. It is important to not only manage fiscal capital, but the human capital as well. It stands that researching districts in receivership under A.B. No. 1840 (Cal. 2018) would provide meaningful lessons for the future of turnaround policy.

CHAPTER 3

METHODOLOGY

As illustrated in the review of the literature presented in the previous chapter, there are many aspects of state and federal turnaround policy that have proven worthy of study. Through previous research, several important findings have been uncovered about the impact of policy over the decades at all levels. For example, NCLB (2001) was a top-down, tightly coupled prescriptive approach to turnaround with a menu of 31 interventions designed to improve student achievement (Brady, 2003). The Every Student Succeeds Act (ESSA; 2016), a more loosely coupled reform policy, gives more latitude to the states and allows them to select their own goals, with some parameters (Plans, 2015).

In addition to the substantive requirements of the policies, the research also revealed that the will and capacity of the leadership and the "street-level bureaucrat" can influence the impact of the policy. It is important to not only manage fiscal capital, but the human capital as well.

This study will look at different operational definitions of coherence and what it means with policy implementation. The research ranged from a systemic reform approach, similar to the approach of NCLB (2001), to looking at coherence as a process that develops through collaboration between leaders and teachers and the intersection of policy and local goals, more similar to the shift to ESSA which allows for more individualized plans.

This study seeks to expand the previous work by focusing on the experiences and leadership of one such turnaround district who has been in state receivership since 2012. And similar to the federal policies, the policies of the State of California (2018) also shifted to allow for more local control of failing districts with the movement from state oversight and decision-

making to the county level. The purpose of this research is to understand and determine the impact of the change of A.B. 1200 (Cal. 1991) to A.B. No. 1840 (Cal. 2018), through the framework of coherence, considering the intersectionality of the will and capacity of the leadership.

Research Questions

Of the districts that have been in receivership in the State of California, all nine have had 66.5%, or higher, of their student population categorized as socioeconomically disadvantaged, with five of the nine having a student population of 86.6%, or higher, socioeconomically disadvantaged (California Department of Education, 2021b). It is hard to separate state receivership and high poverty districts.

In order to learn more about impact of the shift of leadership from the state to the local county office of education brought about by the shift from A.B. 1200 (Cal. 1991) to A.B. No. 1840 (Cal. 2018), the following research questions guided this qualitative case study:

Over-arching question: How has the passage of A.B. No. 1840 (Cal. 2018) impacted the transformation of a school district that has been in receivership under state oversight and moved to the local county office of education oversight? Sub-questions are as follows:

- What is the focus of the various stakeholders involved in the transformation of a district in state receivership before and after the passage of A.B. No. 1840?
- What is the structure of the transformation of a district in state receivership before and after the passage of A.B. No. 1840?
- What are the supports put in place in the transformation of a district in state receivership before and after the passage of A.B. No. 1840?

• Which policy levers for change have been most successful in the transformation of a district in state receivership before and after the passage of A.B. No. 1840?

This research study was a case study. A case study (Mills & Gay, 2019) looks at a particular phenomenon, and in this case study, it is a district under receivership, both before and after A.B. No. 1840 (Cal. 2018). The bounded system would be the leadership and strategies in the school district that are in receivership. In case studies, the researcher must triangulate the data through multiple sources (Mills & Gay, 2019). I provided details about the participants, setting, data collection, and analysis plan.

Rationale for Qualitative Approach

Qualitative case studies are characterized as being *particularistic*, focused on a particular phenomenon, *descriptive*, the results are a rich description of the phenomenon, and *heuristic*, bring about new meaning (Merriam, 2002). Yin (2017) stated that a case study should be used when "a 'how' or 'why' question is being asked about

- a contemporary set of events
- "over which a researcher has little or no control." (p. 13)

As we have learned through the literature review, there has been no one-size-fits-all method of school turnaround. We learned the importance of coherence as a process dynamic in nature. Therefore, to understand the impact of the decentralization of policy, it is important to conduct qualitative research so that the voices and experiences of those impacted are able to be heard. The research has also shown the importance of the will and capacity of leadership and those responsible for the implementation. And while one may argue that those can be quantified,

I believe that the collective stories of those within the district tell the greatest lessons about the policy implementation from those who are most closely charged with implementing it.

Participants

In a case study, the researcher selected a small group of individuals to understand the phenomenon being investigated (Mills & Gay, 2019). This case study used purposive sampling to identify participants. (See Table 1 for the list of participants.) By purposefully sampling the researcher selected those individuals from whom they can learn a great deal (Mills & Gay, 2019). In addition, I did snowball sampling to interview people suggested with more historical background (Mills & Gay, 2019).

To recruit participants, I began by inviting participants who have experience working in or with the district in receivership during the time of receivership. After initial contact via email, I scheduled the interview and send the consent form. If they did not consent to participate, I sent them a note thanking them for taking the time to respond. All potential participants were informed of the research topic, that the project was voluntary, the number of respondents to be selected for interviews, and the criteria for selecting participants. They were told that they would be notified if they were selected for an interview within two weeks of the deadline to respond. A copy of the informed consent form was included for their information.

In order to understand the shift from state to local control, it was important to interview those who have been a part of the state receivership prior to and after the shift from A.B. 1200 (Cal. 1991) to A.B. No. 1840 (Cal. 2018). I looked for participants who were supporting the district in Receivership both before and after the passage of A.B. No. 1840 (Cal. 2018). If there were different people in positions during that time span, it was important to interview both

people. For this, I interviewed members of FCMAT, CCEE, the SSPI, a representative of the County Office of Education leadership team, and representatives of the school district who have been in the position prior to A.B. No. 1840 (Cal. 2018). In order to study the impact of coherence of policy implementation, I interviewed central office leadership, school site leadership, and teachers.

As a result of my professional association with the organizations whom I wanted to involve in this case study, I accessed contact information for many of the members of the participant pool identified, but only used this contact information after appropriate institutional review board approvals were in place, and with the appropriate informed consent protocols.

Table 1Case Study Participants

Level	Agency/Organization	Pre-AB1840	Post-AB1840
State			
	California Department of Education (CDE)	X	
	State Board of Education	X	
	Financial Crisis Management and Assistance Team (FCMAT)	X	X
	California Collaborative for Educational Excellence (CCEE) A		X
	California Collaborative for Educational Excellence (CCEE) B		X
County			
	County Office of Education A	X	X
	County Office of Education B		X
	County Office of Education District Support Team A	X	X
	County Office of Education District Support Team B	X	X
	County Office of Education District Support Team C		X
	Local		
	District Administrator A		X
	District Administrator B		X
	School Site Administrator A	X	X
	School Site Administrator B	X	X
	Teacher A	X	X
	Teacher B	x	X

Setting

The setting of the research was the district in receivership. The school district in receivership is located in an urban area of Los Angeles County, home to approximately 108,000 residents (U.S. Census Bureau, 2020) and according to the California Department of Education (2021b), the district serves approximately 8000 students in 19 schools: one preschool child development center, three transitional kindergartens through grade 5 (TK-5) schools, seven TK-6 schools, one TK-8 school, one grades 6-8 middle school, one grades 7-8 middle school, two high schools, one district-operated charter school (TK-8), one district-operated charter school (9-12) and one school labeled career technical education, adult education, and alternative education. There are seven independent charter schools also located in the district. Approximately 30.4% of the district's students are English language learners and 86% of its students are eligible for free or reduced-price meals. The district's unduplicated pupil percentage is 89.8% (27.7% of students who are English learners, 1% are foster youth, or 88.7% eligible for free or reduced-price meals).

Data Collection

I used the district transformation framework that I created to guide data collection. There were two main types of data collected: interviews and documents, including the annual FCMAT Progress Reports (Financial Crisis and Management Assistance Team, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021).

Interviews

Semi-structured interviews were used to collect data for this case study. The selected participants were interviewed in a manner that resembled a guided conversation, not a structured questionnaire (Yin, 2017). The flow of the questions was more fluid than rigid, focusing on the

"how" and "why" (Yin, 2017). According to Yin (2017, p. 100), there are five levels of questions:

Level 1: questions verbalized to specific interviewees;

Level 2: questions about each case;

Level 3: questions asked of the pattern of findings across multiple cases;

Level 4: questions asked of the entire study;

Level 5: normative questions about policy recommendations and conclusions.

For the purpose of this research, for the interviews, I asked level 1 and 2 questions centered around the District Leadership Framework. This served to answer the needs of my inquiry (Level 2) and maintain a friendly, non-threatening environment with open-ended questions (Level 1) (Yin, 2017). See Appendix B.

The interviews took place via Zoom, a web-based video conferencing service (www.zoom.us), and in person, depending on the availability and preference of the interviewees. The interviews were video and audio recorded and transcribed by Zoom, and audio recorded and transcribed by Otter.ai, a voice recording software. Following transcription and further editing for accuracy, quotes that may be used were shared with participants for member checking. The participants were notified of this as a cost burden prior to their agreement of participating in the research.

I used the district transformation framework, described in Chapter 1, to select and categorize the questions asked during the interviews. For each interviewee, they had at least one response on how the shift to A.B. No. 1840 (Cal. 2018) has impacted their work through mandates, inducements, capacity-building, and systems change.

Document Review

FCMAT Progress Reports

For the archival records, I reviewed the FCMAT operational reviews (Financial Crisis and Management Assistance Team [FCMAT], 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021), beginning in 2013. It was important to note the nature and conditions of each record so that their interpretation is accurate and useful to the study (Yin, 2017). The FCMAT reports contain both qualitative and quantitative data. The introduction to each report gives a state of the district and background information. The report is broken into five sections: Board Governance and Community, Personnel, Pupil Achievement, Facilities, and Financial. For the purposes of this research, I focused on the finding and recommendations by FCMAT, and not the numerical scores for each element.

District in Receivership Documents

It was important to be critical in interpreting the data collected from the documents, understanding the purpose and audience for their creation (Yin, 2017). For the document review, I began by looking at the requirements of the annual FCMAT progress reports (Financial Crisis and Management Assistance Team, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021). I used the progress reports to guide me to the documents that are created and submitted each year to meet the requirements of FCMAT. I looked at the documents from the 2018-2022 reviews (Financial Crisis and Management Assistance Team, 2018, 2019, 2020, 2021) to see the progression of the items that are included and how they have changed along with the systems change that occurred with the passage of A.B. No. 1840 (Cal. 2018) and the change of the

district oversight from the state and the county office of education prior to the 2019 annual review.

Analysis Plan

Once the data had been collected, I compared and contrasted patterns related to the district leadership, processes, systems, structures, and strategies for turning around a district, as well as aspects of coherence, in hopes of creating generalizations that can be applied to leadership of other districts in, or at-risk of being in, state receivership. Once the interviews were conducted, the transcripts were organized by the questions and the respondents, disaggregated by the sphere in which they serve. I coded the data for the sectors in which participants work as well as the key elements for each pillar of the district transformation framework (see Figure 4). I began coding by organizing the responses by pillar, focus, structure, and support. Within each pillar, I organized the responses by the sector in which the participant works. Then within each pillar, I organized the responses by the elements. Within the focus pillar, I looked for responses around purpose, goals, and accountability. Within the structure pillar, I looked for responses around collaborative work and support from the central office. In the support pillar, I coded the responses around capacity building, reorganization, and continuous cycles of improvement. Once I coded for the pillars, I organized the data from the policy levers for change: capacity building, mandates, inducements, and systems change. Again, within each lever, I organized the responses by the sector in which the interviewee serves. Once I coded for the major elements of the DTF, I looked across the pillars to see if there were any themes that were emerging other than the keywords in the DTF. Analysis took place in three phases:

- Analysis of FCMAT Reports: Reviewed recommendations to understand the requirements placed in the district,
- 2. District in receivership documents—looked at alignment (coherence) between what FCMAT is asking for and what district says they will do, and
- 3. Used interview data to understand coherence between recommendations, goals/priorities/strategies, and implementation.

I looked for coherence in the responses of the interviewees using Fullan and Quinn's (2016) model of: Cultivating Collaborative Cultures, Deepening Learning, Securing Accountability, and Focusing Direction; however, it is important to note that Honig and Hatch (2004) reminded us that coherence changes in implementation. For purposes of this research, I looked at the coherence with the implementation and the original intent of A.B. No. 1840 (Cal. 2018), as well as the coherence across the district in the actual implementation.

Limitations and Delimitations

This study followed the district over the last nine years of state receivership. While that gives a lot of years of research, there were also nine leaders in those nine years. While there have been turnovers, the policy has remained constant until the change from A.B. No. 1840 (Cal. 2018). The effect of the turnover in leadership will need to be considered as a factor in the district's attempts to come out of state receivership. Another limitation of this research was that, due to the COVID-19 pandemic, there was no FCMAT operational review for the 2019 school year.

For this research, it is a strength that I am a member of the county office's district support team and I am able to see the impact of the reforms in my daily work and relationships.

However, my positionality can also be a source of bias as I am close to the operations and efforts to reform the district. In addition, due to my positionality, the interviewees I selected may be biased as they were based on my networks and who I knew would respond to my requests. As a limitation, I was not a part of the district support prior to the passage of A.B. No. 1840 (Cal. 2018), but I strived to achieve that view through the voices of those participants who were involved at that time.

By nature, a case study is thick with description. It is up to the researcher to decide how much of the report is a story, how to compare it to other cases, how much to formalize the generalizations or to leave it up to the reader, how much description of the researcher to include, and whether, or how much anonymity of those interviewed to protect (Stake, 2008). Case studies are also limited by the sensitivity of the investigator (Stake, 2008). In this case, the interviewer works with the participants and will want to preserve their professional relationship. This study followed a district over the last ten years of state receivership. While that gives a lot of years of research, there were also nine leaders in those ten years. While there have been turnovers, the policy has remained constant until the change from A.B. No. 1840 (Cal. 2018). The most recent county administrator is the only one who has been in the position since the passage of A.B. No. 1840 (Cal. 2018), but also, they have been in the position the longest. A limitation is that it is hard to separate their leadership and the passage of A.B. No. 1840 (Cal. 2018). Another limitation of this research is that due to the COVID-19 pandemic, there was no FCMAT operational review for the 2019 school year. My positionality as a part of the county office support team is another limitation, as it could possibly influence the responses given to me during the interviews. However, in the 16 interviews with representatives from the state, county,

and the district, many of the same responses were provided for each, and I feel very confident in the findings of this research.

Credibility

Stake (2018) argued that case studies should be the new gold standard in educational research. The strength of qualitative approaches is that they account for and include difference - and most important, humanly. They do not attempt to eliminate what cannot be discounted. They do not attempt to simplify what cannot be simplified. Thus, it is precisely because case study includes paradoxes and acknowledges that there are no simple answers, that it can and should qualify as the gold standard (Stake, 2008). Case studies are by nature trustworthy, as they give such detailed information (Yin, 2017).

To ensure credibility, I shared the transcription of the quotes I used with the participants and used triangulation to substantiate claims made in the analysis. I triangulated the data from the interviews, documents created by the district in Receivership team, and the archival records of the FCMAT annual reviews (Yin, 2017).

CHAPTER 4

ANALYSIS AND FINDINGS

The purpose of this research was to study a small part of A.B. No. 1840 (Cal. 2018), which was part of the California movement toward more local control of school finances and decision-making. There are currently four districts in the State of California (2018) that have taken out emergency loans and are in state receivership.

The overarching research question for this study was: How has the passage of A.B. No. 1840 (Cal. 2018) impacted the transformation of a school district that has been in receivership under state oversight and moved to the local county office of education oversight? Sub-questions are as follows:

- What is the focus of the various stakeholders involved in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- What is the structure of the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- What are the supports put in place in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- Which policy levers for change have been most successful in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?

For this case study, emails were sent to known contacts to request their participation. The Human Subject Bill of Rights and informed consent forms were provided. Once the participants agreed to be a part of the study, I used a workflow in Calendly to find mutually available times, email reminders, and follow-ups. Sixteen interviews were conducted: five representatives of state

agencies, four county representatives, and seven district representatives. The interviews ranged from 30 to 120 minutes and were conducted virtually using Zoom. The interviews were recorded using the Zoom recording feature, Otter Ai (https://otter.ai), and a voice recording. I started with a set of semi-structured interview questions and allowed for variations based on the interviewees' time with the district as well as their positions. One interviewee in particular did not have direct experience with the district in the case study but was able to provide a significant amount of historical context.

Once the interviews were conducted, the transcripts were organized by the questions and the respondents, disaggregated by the sphere in which they served. I coded the data for the sectors in which participants worked as well as the key elements for each pillar of the district transformation framework (see Figure 4). I began my coding by organizing the responses by pillar, focus, structure, and support. Within each pillar, responses were organized by the sector in which the participant works. Then within each pillar, I organized the responses by the elements. Within the focus pillar, I looked for responses around purpose, goals, and accountability. Within the structure pillar, I looked for responses around collaborative work and support from the central office. In the support pillar, I coded the responses around capacity building, reorganization, and continuous cycles of improvement. Once I coded for the pillars, I began organizing the data from the policy levers for change: capacity building, mandates, inducements, and systems change. Again, within each lever, I organized the responses by the sector in which the interviewee serves. Once I coded for the major elements of the DTF, I began to look across the pillars to see if there were any themes that were emerging other than the keywords in the DTF. The themes of relationships and trust surfaced across all three areas, as well as an

important lever. Throughout the interviews, the interviewees had the opportunity to expand on any ideas and add any information they would like to share. With 16 interviews, I was able to hear many views and opinions of the shifts in leadership due to the passage of A.B. No. 1840 (Cal. 2018) and saw many similarities at each level.

This chapter is organized around the district transformation framework (Figure 3) and the themes that emerged from each pillar. The first pillar of the DTF is *focus*. Each member should define their purpose and goals within the transformation, as well as how they will hold themselves and others accountable (Fullan & Quinn, 2016). I would argue that while there may be a policy that defines the *why*, each stakeholder at each level of the organization may have their own focus. It is important for one to know their own focus, as well as others. By understanding each other's focus, one will have better clarity of the policy levers used to motivate the change. After reviewing the results of this research, the responses showed that the focus for each sector of work differed, which will be further explained later in this chapter under "Focus."

Once the focus of the transformation has been identified, the second pillar of the DTF is *structure*. In the case of district transformation, it is extremely important to focus on the role of the central office in its support of the school sites (Honig & Rainey, 2020). Through the research and interview process, it was evident that collaborative work was important to each sector, and each had several collaborative partners across all levels. However, the impact of the support of the central office staff was viewed differently, which will be explored more in depth later in this chapter under "Structure".

The third pillar of the DTF is *support*. It is important that all levels of the organization define what they will do to support the transformation process. In this pillar, most of the responses focused on capacity building, not reorganization or continuous cycles of improvement. Each partner interviewed could speak to the importance of building their own capacity, as well as the capacity of those whom they support.

Along each step of transformation, it is important to acknowledge and recognize what lever for change is necessary, also noting that this may be different for each stakeholder group (McDonnell & Elmore, 1987). Prior to the research, I focused on capacity building, inducements, mandates, and systems change (McDonnell & Elmore, 1987). However, what became obvious throughout was the role of relationships and trust building. This discovery led me to conduct further research on trauma-informed practices.

I began by reviewing the focus of the work in the district, highlighting the themes that emerged through each element. I then moved to the structure of the transformation, indicating the themes that occurred. And then I analyzed the results by theme on how supports have been provided in order for this transformation to occur. I looked at the policy levers for change in this particular district, noting which levers are seen as more impactful at each level, state, county, and district. Throughout all the interviews, at each level of support, interviewees discussed the importance of trust and relationships. I have included an analysis of the major changes that occurred from the systems change of the shift of leadership and oversight of the district in receivership from the state to the local county office of education. I conclude with reflections on the role of having a culture of care.

Participants

I had the opportunity to interview five representatives of state organizations and leadership. Of these representatives, three had knowledge of the district's condition both before and after passage of A.B. No. 1840 (Cal. 2018). One of the representatives of state agencies only joined the support team in 2021. The remaining representative had never directly supported the district involved in this case study but has provided extensive support at the state level. I interviewed four county representatives, all whose positions were created to support the work of A.B. No. 1840 (Cal. 2018). All four positions were developed with the sole purpose of supporting the district in achieving the recommendations from the FCMAT annual reviews. I had the privilege of interviewing seven district representatives, from certificated and administrative positions. Of these seven, four of those interviewed worked as employees in the district before and after the passage of A.B. No. 1840 (Cal. 2018). The other three worked in other capacities as support to the district prior to A.B. No. 1840 (Cal. 2018) and were hired as district employees after the passage of A.B. No. 1840 (Cal. 2018). This was helpful, as they all have had an extensive history with the district.

Focus

The first pillar of the DTF is *focus*. This pillar looks at three elements that lead to the focus of the work: purpose, goals, and accountability. I asked those who were interviewed about the focus of the work by various stakeholders involved in the transformation of the Inglewood Unified School District as a result of the passage of A.B. No. 1840 (Cal. 2018).

To drill down to the focus elements in the DTF, I first asked clarifying questions on the interviewee's understanding of state receivership and A.B. No. 1840 (Cal. 2018). This helped

align the language with the rest of the questions. I asked the interviewees to describe their work in the district transformation back to local control, having them reflect on their goals. Lastly, I asked questions around accountability in regards to how they are held accountable, internally and externally, as well as how they hold their team accountable.

Purpose and Goals

Overall, everyone interviewed was familiar with the process of state receivership and the impact that it has had on the district that is the subject of the case study. In addition, most stated that as employees get further from the district office, or recently hired, they saw the FCMAT annual review as the same as state receivership when it is actually only one component. The current administration presents receivership at the annual opening meetings as well as throughout the year. However, with the high staff turnover, the understanding of receivership was reported as being inconsistent. For example, one county representative shared about *goals* and *purpose*, which was a very similar response as given by the other three who were interviewed:

I think my goal just like everybody else is to return the [the district] to local control. I think it was a wise move by the state to give oversight to county offices as opposed to trying to do it at the state level. Because I just think our resources are vaster and we're closer to being able to provide that support. So, you know, the goal is to return this district to local control and honestly provide a foundation for success once we leave.

One county representative offered the following in relation to their support, specifically considering their goals:

I get direction from, you know, the [county office of education], supervisors and so forth.

And the needs of basically, the district goes, like, what is it? What does the district need

now? And how can I support it in the capacity building in this? Okay, do I continuously check in and build capacity along the way? And can I help fill in those goal holes that exist?

Similar to state and the county representative who reported their primary focus and goals were aligned to the FCMAT review process, a district representative reinforced its importance.

This district representative reiterated that it is pertinent for those within the district to understand the purpose and goals associated with a district in receivership by saying,

But, more importantly, what is it going to take for us to regain local control? And what every staff member knows about their role is in that process. So, we start with that right with, with our own employees, with our own family, but then also with our board members.

One district representative also concurred with the idea that the FCMAT recommendations created the *purpose* and goals of the work in the district. However, they did not feel as if that was a negative point. This representative stated:

It is recommended in the FCMAT report, but I think that the FCMAT report there's nothing too outrageous, and that it's basically if you're doing things the right way, FCMAT will be okay. FCMAT recommends good [department] practices. So, I kind of feel like if you're doing a good job and you put those systems in place, I think FCMAT might kind of point you in the right direction. But at the same time, there's nothing that's that revolutionary about FCMAT recommendations. It's just good business practices.

And while A.B. No. 1840 (Cal. 2018) is a financial trailer bill, one district employee called to attention an important factor:

So academic achievement is crucial because I want my students to be able to be the best no matter what school they go to, whether they stay in [this district], or go to one of the top private schools or top public schools. I know that they should be able to do everything that everybody else is doing, and it should not be a struggle

As those interviewed got closer to the school site, the purpose and the goals moved further from the language of the standards and recommendations from FCMAT and closer to what the site leader felt were the priorities for their school and school community. This sentiment of drilling down in the district was taken a step further when an employee aligned their work not with the FCMAT review process, but with those who benefit most: the students. To this district representative, this was where their accountability lied:

I think that our students should have everything that a top public or top private school has access to. I don't care what your zip code is; I don't care what your family's financial background is, as our student you should have access to that.

One district representative did not agree that the work should be centered around meeting the recommendations of the FCMAT review process and stated:

And I think that's something that should be really looked at because, in a sense, it feels like the tail has been wagging the dog for a number of years now. And the focus seems to be on meeting the FCMAT goals. But that is the roadmap that the state and county have provided for us to get out of receivership. So, I understand that completely, but at the same time, there have been unique circumstances. And sometimes the roadmap has to take those unique circumstances into consideration.

Summary of Focus

Reviewing and reflecting on the responses from all three sectors as they related to the focus of the work when transforming a district out of state receivership and back to local control, ultimately it appeared that all involved wanted the same outcome: student success. The slight divergence came from the goals and accountability. At the state and district level, the goals and accountability primarily come from the recommendations from the FCMAT review recommendations. The district representatives, and particularly those at school sites, saw the FCMAT process as a mandate that was not connected to their purpose of student success. An important learning from this was that the teams needed to work on their messaging of the FCMAT recommendations and provide opportunities for the school sites teams to see how they can help schools reach their goals and purpose. By doing this, all three sectors can be aligned with their focus.

Structure

The second pillar of the district transformation framework looked at the structures put in place to lead to the transformation of a district in receivership. This pillar has two main elements: *collaborative work and partnerships* and the *role of the central office support* to school sites.

To drill down to the structure elements in the DTF, I asked questions about the interviewee's collaborative relationships, not only within their sector, but across all three: state, county, and district. I also asked questions around the support that the district office staff provided to the school sites to support their purpose and goals, as well as providing structures for accountability.

Collaborative Work and Partnerships

Overall, with each group interviewed, there was an emphasis on collaboration. And through this emphasis on *collaboration*, I saw the emergence of the theme of the importance of relationships and trust building, which are discussed even further in this chapter. All three of the groups interviewed saw an increase in the *district office support* with the passage of A.B. No. 1840 (Cal. 2018), as the county office of education developed a support team, assigned to areas based on a systemic review completed by the California Collaborative for Educational Excellence (CCEE). This team has been predominantly located at the district office and provides support to the central office staff, as well as the school sites.

Collaboration

The two major elements of the structure pillar looked at collaboration and district office support for schools. Throughout all the interviews, questions around these two elements of the *structure* pillar also brought up the theme of the importance of relationships and the building of trust.

Representatives of State Agencies

With the shift of leadership in the district, the state collaboration has not changed drastically, just in frequency and duration. Prior to the passage of A.B. No. 1840 (Cal. 2018), there were teams, such as special education, who would travel from Sacramento to the district to provide reviews and support. With the passage of A.B. No. 1840 (Cal. 2018), and the creation of a county office of education position for special education support, these visits were no longer necessary, as there was support provided on a daily basis. A representative of a state agency said,

"People need time to be able to work together to address these complex problems." This is something that is difficult to achieve without being regularly on site.

In addition, by the state being the first district partners, there are lessons that can be learned from those collaborative relationships. While the leadership oversight has changed from the passage of A.B. No. 1840 (Cal. 2018), the focus of the work remains on student-level success. The oversight shift has not impacted or changed the focus of the work. This was demonstrated through the words of a representative of a state agency who said, "So we definitely learned about engaging teachers; it's important to do that. I think that's probably our main partners."

County Representatives

With the move to the oversight by the local county office of education, during these interviews, it was noted that the county involvement and support has increased. With the county office district support team being in the district on a daily basis, they have been able to report to the county office's executive cabinet the positive work being done in the district that is hard to see if only present on a monthly basis. One representative of the county office district support team said about their ability to share with the county office executive cabinet what they have seen within the district:

We have meetings that I'm involved with the [county office of education] cabinet on every other week basis. But you know, it's [county office of education superintendent] and [their] cabinet to see how they can best support [the district]. And so that's helpful in two ways. Number one, we can kind of brag a little bit about the work we're doing and kind of show off a little bit, but at the same time, it kind of goes both ways, right? They

want to see that we're making progress. They're holding us accountable. But at the same time, we're able to ask for support as we need it.

District Representatives

Continuing with the theme that the client of the work of A.B. No. 1840 (Cal. 2018) is the students, a district office representative said this around the increased collaboration as a result of A.B. No. 1840 (Cal. 2018) and the development of the county office district support team:

It's frequent communication with the principals. It's frequent communication, in some cases with the assistant principals, and also with the certificated [labor partner]. You know, trying to get that feedback about how things are going out there. And then just doing our best to make sure that we're being responsive to the needs out in the district. The increased collaboration at the district office level spills out to the school sites.

One district representative echoed the importance of the collaboration with the teachers, saying:

But also, I think the respect I see particularly [the chief academic officer and the county administrator] and the way they reach out and make sure that they always include the teachers or do their best. It's important. I think that there should be more collaboration between labor and management. It would make a big difference in education.

District Office Support

The role of the district office is to support the school sites in their needs in providing high-quality education in safe learning environments. I asked the 16 interviewees to describe the role of the district office in this district in receivership. Across all three sectors interviewed, there has been an increase in the district office support after the passage of A.B. No. 1840 (Cal. 2018)

and the county office of education's creation of the district support team. The county office hired experts in their areas, with all but one of the certificated members coming from executive cabinet experience.

Representatives of State Agencies

At the state level, most of the work is done supporting the county office and the executive office staff. This has been difficult for one representative of a state agency, who themselves, has served at every certificated level in a school district. For them, knowing that the real change happens in the classroom, they have struggled with the state support being focused at the executive level. They stated:

And the reason why I struggled with the strategy for this was because when you look at the research, when you look at what really changes our competence, it is what's happening in the classroom, bottom line. What's happening in schools, what's happening in classrooms, and so school leaders are an important part of that. However, this is why systematic reviews help you to understand at what level should that intervention be because yes, you're right, which should come at that school level. But if the school leaders are also in need of development, understanding there's no real teams at the school.

As a state agency, and when the state had oversight of the district prior to the passage of A.B. No. 1840 (Cal. 2018), it was difficult to provide direct support to the schools and the school leaders. This statement supports the county office's creation of the district support team as they are able to be boots-on-the-ground support, forming relationships and trust with the district office

and school site leaders, to support the initiatives and changes necessary to return the district to local control.

When the state was looking at providing local support, along with the county office of education, they looked at the systemic reviews to see where there were gaps in systems and expertise. According to one representative of a state agency:

So, our strategy for [the district] was wanting to see, finances-wise, how positions like [county office district support teams] were funded, where we needed to build that web of support within the district office, first. So that way, they can be a strong resource and identify the right mechanisms to continue to support schools in school teams. And so, we decided to fund and support more from a district office perspective rather than school level perspective, which was hard because as you know, if you talk to [the chief academic officer], you'll see I kept talking about the need to transition to school for the changes that we need to see for kids. It isn't going to happen just in the central office.

County Representatives

The role of the county office is to support all the school districts and local education agencies within the county borders. A.B. No. 1840 (Cal. 2018) did not change the fact that the local county office has always supported the district; however, the direct oversight of the receivership process was given to the county office of education superintendent as well as the development of the county office support team.

All the county representatives felt as though their main responsibility was to provide support. When interviewing one of the county representatives, they stated:

There was an understanding that the most important relationship in this district is between the teacher and the student. And, and that really communicates that every single teacher is important, and every single student is important. And I have a job, whether I'm the secretary and the district office, or a bus driver, or a custodian, my job is to support the interaction between the teacher and the student. And, and so during the time that I was there, I really tried to help people understand.

For this representative, the impact of the role one plays in a district is not dependent upon the title one holds, but it is more important to consider the direct impact on students:

And that principal at that school, who nested learning community theory, is the one who supports that teacher to do the very, very best they can for the student. And really, to create that culture where, you know, parents and families understand, you know, I don't care whether you're the superintendent or the chief academic officer, or the executive director, or Grand Poobah of something. Parents in the community have to understand, I have a job because you pay taxes. I'm here to serve you. I'm here to serve you and make sure your child gets a good education.

District Representatives

It is very important to understand how the district representatives see and feel the impact of district office support for the school sites. This is true for any district, but especially in the district in this case study, as the county has committed many additional district office support positions at no cost to the district.

When interviewing the district representatives, it was very concerning when one person stated:

The volatility that we have experienced in [district] over the last [years of receivership] is such that it often feels you know, the purpose of the central office is to support the schools, but it often feels like it's the role of the school to support the central office with what they need to provide the county or the state.

This feeling was echoed by another district representative who said:

I think they're trying. I think that there's just so much. I think that sometimes it becomes overwhelming. It's almost sometimes we feel that it's overwhelming for the different offices to address all the needs and fix all the things because there's so many.

However, there was a more positive view of the support when one district representative said, "I think via the local support team, the local support team is able to help the district office staff and then kind of put those structures in place, and then from the district office steps to the schools."

Summary of Structure

Throughout all the interviews, the importance of relationships and trust came up time and time again. If there are school site staff who feel the district office is not able to do enough to support their focus, it would be recommended that there is more collaboration to align the purposes and goals to make sure the appropriate level of district office support is being provided.

Supports

This third pillar of the district transformation framework looked at supports for transformation, especially capacity building, reorganizing, and continuous cycles of improvement. Capacity building is also one of the levers of change that is discussed more in depth in the next section. In order to drill down to support, or *the what*, that needs to be done in

order to transform a district out of receivership, I asked the interviewees about the way they build the capacity of their teams. Questions were also posed around reorganizations that they had led or been a part of during this transformation process. In addition, there were inquiries about the continuous cycles of improvement. The majority of the responses were concentrated on *capacity building*. The interviewees did not have many examples of reorganizations or continual cycles of improvement. For both of these areas, I believe that the difficulty with the responses has more to do with the way the interviewees frame their work and not that they have not participated in them. Because of this, this section mostly centers on the element of capacity building.

Capacity Building

Representatives of State Agencies

Overall, the majority of the representatives of state agencies saw their role as building capacity. Even the purpose of the recommendations in the FCMAT annual review has been to provide a roadmap for how to improve the district. One of the representatives of state agencies, who has been supporting the district post-A.B. No. 1840 (Cal. 2018), said:

I think one of the beauties of my role and my job is its constructivist. Where is the help needed? You know, do you need me to sit in on a counselor meeting because I have a passion for a 30 day? So, it's just sort of like finding the spaces and building relationships and trust within those relationships, and then leaning in wherever the team feels that we can add value to ultimately impact outcomes for kids and their experience in [the district's] schools.

It is important with a district in receivership, where there are so many outside agencies being brought in to provide support, that the first pillar, *focus*, is clearly developed. By everyone sharing the same guiding vision, the work of capacity building will all be directed toward those shared goals. When discussing their role in support for the district and the way they build the capacity of those whom they support, a representative of a state agency said:

I totally believe that I can't just come and tell you you need to do these things and not be willing to roll up my sleeves and figure out how to help you where you feel it's appropriate. I cannot impose my support. It doesn't work, and my experience doesn't work either. But I do think that if I present some good, talented people to help solve this work with you, or any other kind of support could be funded, identifying funding for professional development or whatever it may be. That is what was also our role in ensuring that some of those goals that we set were being met. You have got to be clear about what you're doing and what you're focusing on. I think in the beginning, it was a little hard to get that clear because we're also building trust. Whether it was a CDE lead or even my partners that are involved in the work, someone like [a county office support team member], you know, you're there to help as the County Administrator; we're funding the position, but you know, we need to take some time to build that trust.

County Representatives

When it comes to the county office support, the support team's work has been driven by the recommendations in the FCMAT report. According to FCMAT, the report has been written as a deficit model. This means that the emphasis of the report is focused on the recommendations for improvement. These recommendations have been developed from deficit areas. This has

caused a lot of discomfort for the staff and has been said to cause low morale. The district team provides a year's worth of work and evidence, and the overwhelming majority of the feedback, by design, has been areas of improvement, not areas of success. Therefore, the district and county staff are charged with the framing of the report to acknowledge the positive growth, while still remaining focused on the next steps based on the recommendations of the annual review.

District Representatives

The idea of capacity building, while being a prominent goal in the work at the state and county level for a district in receivership, is not received the same at the district level. As I was asking questions of the district staff, and sensing the discomfort, I did not emphasize these questions with this group of representatives. It was apparent that after a decade of being in state receivership and after outside agencies said that they are in the district to build capacity, that the district staff was feeling inadequate and not respected. As I reflected on this approach, and these questions, it felt that the notion of capacity building was a feeling to the district staff that they, too, were being viewed from a deficit model, the language used by the FCMAT review process.

Continual Cycles of Improvement

Cycles of inquiry, continual cycles of improvement, and data analysis are important in any transformative process. I believe that the CCEE systemic review and the FCMAT annual reviews are continual cycles of improvement. However, many interviewees did not see this as a part of the work that they were doing.

When asked about cycles of inquiry and support, one of the first members of the county office's district support team explained how she used the data from past audits to determine in which area she would start as you cannot implement the changes necessary for all the

recommendations at one time. These cycles of improvement in the FCMAT annual review spiral. The scores are unlikely to go from a zero to a 10, so the work spirals, repeating, growing, expanding (see Appendix A). She stated:

And so, I was part of that original support team that really went in and said, you know, let's take a look at some of the audits that had been done in the past. Let's take a look at them. See what's in place and really develop some key strategies, areas of focus, because in a district like [the district in receivership], of course, you know, instincts, you want to try to fix everything. And you can't fix everything. You have to really be strategic in which levers you push to try to cause change to happen.

Summary of Supports

The theme of relationships and trust has again emerged in the third pillar and the element of capacity building. Capacity building doesn't just happen. In order for a person to change their practices, or to be willing to change from their comfort zone, there needs to be trust in the relationship. And trust takes time. Over the past 10 years of receivership, and the multiple turnovers of key leadership staff, trust has been difficult to establish. The hope is that with the new model of support that has been created out of A.B. No. 1840 (Cal. 2018), there will be more continuity of leadership that will lead to trusting, supportive, capacity building relationships.

Policy Levers for Change

Lorraine M. McDonnell and Richard F. Elmore (1987) proposed a framework of looking at alternative policy instruments including: (a) *mandates*, rules governing the actions, (b) *inducements*, transfer of money to support the policy, (c) *capacity-building*, transfer of money to invest in material, human, or intellectual resources, and (d) *system-changing*, official transfer of

authority (McDonnell & Elmore, 1987). For this research, I looked at the impact of the mandates, inducements, capacity building, and systems change included in A.B. No. 1840 (Cal. 2018) as levers to transform the district back to local control. The state receivership process fundamentally changes the governance of schools by removing the board of trustees as a decision-making body, which is a systems change. A.B. No. 1840 (Cal. 2018) fundamentally shifted that authority by moving the decision-making authority and oversight from the state to the local county office of education.

It is important to remember that A.B. No. 1840 (Cal. 2018) was created as a finance trailer bill. However, this bill has provided capacity building by referring any district who receives an emergency apportionment loan to the California Collaborative for Educational Excellence (CCEE). In addition, the county office of education developed a district support team to support the development, implementation, and monitoring of the recommendations included in the FCMAT annual review.

As with any policy, A.B. No. 1840 (Cal. 2018) has provided many mandates for the districts in receivership. A.B. No. 1840 (Cal. 2018) established Educational Code Section 42161, which states:

- (a) For the 2018–19 fiscal year, the [school district in receivership] shall do both of the following:
 - (1) Meet the requirements for qualified or positive certification for the school district's second interim report pursuant to Article 3 (commencing with Section 42130) of Chapter 6.

(2) Complete comprehensive operational reviews (see Figure 1) that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability. A.B. No. 1840 (Cal. 2018)

The only way for districts to move out of state receivership has been for them to satisfy the requirements of the mandates.

A.B. No. 1840 (Cal. 2018) has provided inducements to the district. If the district has met the mandates of the bill over a three-year period, the state will forgive a percentage of the operating deficit of the district. While these inducements are important at the Executive Cabinet level, they have not been strongly felt or understood, or even known, at the site level. When asking questions about the degree of motivation around the inducements of A.B. No. 1840 (Cal. 2018), the majority of those interviewed, at all levels, referred to the low wages paid.

To gather an understanding of the impact of the four policy levers for change that are included in this research, I asked the participants about each individual lever, capacity building, mandates, inducements, and systems change, along with their thoughts on the impact on the work needed to transform a district in receivership. The final question was more personal as I asked them which policy lever motivates their own work. While most of the 16 interviewees saw impacts from capacity building and mandates, there was a common theme throughout that emphasized the impact of building relationships and trust. This idea of building a community of care is very similar to anyone, or any organization, having a trauma response.

Capacity Building

The building of capacity is essential to sustain any reform initiatives (Fusarelli, 2002). Throughout the responses to each pillar's question, the importance of capacity building for a district in receivership and that has experienced so many administrative changes was clearly established. One interviewee said, "Maya Angelou said when we know better, we do better. So the 'know better' has to be teachers first and foremost."

In the language of A.B. No. 1840 (Cal. 2018), supports are provided to districts in receivership to build capacity. Even the annual FCMAT reports have worked to build capacity by giving recommendations to the district on how to improve systems and practices in each of the five domains. One of the representatives of state agencies said:

I think that's been part of our conversation, and the significant role of [of our support] was around capacity building. We could see you could, based on the [strategic instructional review], provide additional resources that the county or the district identify to support in that capacity building.

It was reported earlier that the county office of education created a dedicated district support team based on the district's areas of deficits. The impetus of this team was the FCMAT recommendation of capacity building at the local level. One member of the county representatives said:

I think we did a really good job of holding one another accountable and staying true to the plan and really seeing our job as teaching the people who were there. The value of having an instructional focus that became the Guiding Light of the district, right? This is all about student outcomes. This is all about what we're doing for the students. We knew there was a lot of work that had to be done with facilities. We knew there was a lot of work that had to be done with school closures. We knew there was a lot that had to be done with maintenance projects, getting the fiscal house in order, having better systems in place for student attendance, etc. But I think we really, really believed that if we could teach the people who were there how to have a strong instructional program, really believing in the teachers, building the skills of the teachers who were there, that those other things would fall into place.

The term capacity building lends to the idea that there is some deficit area that needs to be addressed. This is very sensitive for most people, and I asked a participant how, as an outsider, they build the capacity of those whom they support in a way to feel supportive and not judgmental, and their response was:

Well, I think a lot of it, a lot of it was modeling. Staying, you know, as leaders, and when you're trying to build capacity in a team, often it's a combination of your words and your actions, because people, people see you there, they pay attention to what they see. And so, in every role I've had in education, right, I've always tried to be the first one to arrive, and the last one to leave. Because when people see and they recognize that you work hard, they understand clearly that you're communicating that expectation.

As described in the support pillar element of capacity, interviewing the district representatives, it was even more personal, as for many of them it felt that the district's "lack of capacity" has been why the district continues to be in state receivership. I asked one representative how they build the capacity of the team they support, and the theme of relationships was evident again. They responded:

By intentionally trying to focus on the culture and climate of the school. I really believe that has to come first in order to have any academic success. So really, you know, we have to, in these times, especially, really pick what hill we are willing to die on. And for me, [Positive Behavior Interventions and Supports] has been one of those few hills. Just to address the culture piece and then personally, just trying to be genuine and show that I care and am there to support them. And try to lead by example.

The district representatives' approach to capacity building is very relational, as they are the closest to the focus of all work, the success of students. This is expressed when one district representative, when asked about capacity building of those whom they support, said, "Because in my heart, that's why I'm helping support. I'm developing. I'm being a part of their life, and all I can give to them is belief in themselves and share what I know so that they can do better."

The relationship between the four policy levers for change in the DTF was well described by this district representative:

I think capacity building is most important. We can have as many mandates as we want; we do need some, but if we don't have capacity building, it really doesn't matter.

Because one of the reasons why we are in this position is we didn't have any one person left in the position. No one else knew what to do. You know, and that person will come in and start straight from scratch. There wasn't a manual. There wasn't anything left for that person, so there was no training just here. So, the capacity building is huge.

Mandates

Mandates appear to have the most impact on the focus pillar of the DTF. Mandates can support a district as they determine their purpose, establish goals, and develop accountability

structures. However, only one of the respondents stated that the mandates are the most important policy lever for change in this district.

When describing the purpose of having mandates, one representative of a state agency said, "In any urban environment, a leader has to confront all of those things that are going to distract you from this laser-like focus." This is what mandates can provide. However, they negate the emphasis on the human side of education. Another representative of a state agency stated, "How does a state mandate a district to get better? I don't know anybody who shows up for work just to do enough today. [And says,] 'I don't really want to do great things for kids.""

The conversation with the county representatives also connected the personnel with the mandates. One of the benefits of moving from the state to county was building relationships with the community members to better understand the impact of the mandates. One county representative took the opportunity to interview the classified staff to understand the mandates from their point of view. This is what that county representative shared:

Well, the moving from state to county I think, I hope it feels like it's harder to manage than county because not only is it just so far removed, but with the county comes additional support. So, like I said, from one to many, and really understanding. I don't think a person, one person, can understand all the things that are wrong, that are happening in a district. Unless you really do like the nitty gritty. Like, I don't know how that would happen. To really understand. What are all the things that are wrong in a district that's in receivership from that bird's eye view? We interviewed so many people, and this is where I think I've been lucky in that I've been able to flex different muscles, and this particular job, and I can use my Anthro background; I can use my psych

background; I can use my stats background; I can use my social research background and kind of mold and understanding whole different ways and say, 'Okay, this is how this is, what's really happening and let's, let's figure it out.'

Many of those interviewed as district representatives have been a part of each annual FCMAT review and were very familiar with the mandates. One district representative connected the mandates and the capacity building, saying, "I mean, without the mandates, we don't know which direction we're going to go in. So, we need the mandates, to build capacity to get out of that deficit. Right. They all align." The one interviewee who most highly ranked mandates said, "I don't think you can run any kind of organization without having some, you know, policy something in place. You know, and so, I've seen us really move towards that. And that's helping a lot."

Similar to the responses to the other questions, two of the interviewees countered the importance of the mandates, providing statements about the intrinsic nature of the work of educators. This echoed the recurring theme in the interviews about relationships. Here is what one of them shared:

I think, I mean . . . we're intrinsically motivated. That's why I think that is not necessarily getting out of FCMAT, that kind of superficial exchange, an authoritative body is not going to motivate the work. As an educator, I always thought that we got into this position, or into this field, to help others. I think that, if we can kind of base things around that, that this is the right thing to do; it might be a FCMAT recommendation, but we need to do A, B, and C to deliver better educational products, who are our kids. That's probably the best way to motivate folks. But you know, I know that we have those

external things we have to be mindful of and, and those boxes, we have to check. I don't think it's a motivating factor for a lot of people. It is for the people at the top, but I don't think it is necessarily for the rank and file of the organization.

Inducements

Considering the fact that A.B. No. 1840 (Cal. 2018) was created as a finance trailer bill, it may be interesting that inducements are reported as having the least impact on the work of all three sectors. At the district level, the inducements included in A.B. No. 1840 (Cal. 2018) were felt to be too far removed from the school site to have an impact. One district representative said, "With inducements, I haven't seen them as much on the school site, so I'd love to hear if you've had any." When you speak to most people in the field of education, they did not choose this career for the paycheck.

The stigma of being a district in receivership has impacted people differently. One participant shared, "Well, of course, financial incentives are important. Our salaries are horrible, and we want to get out of receivership, we really do, who wants to be saying that you couldn't pay your current bills." However, another district representative shared:

I'm not concerned with what's on paper, checking boxes, because if we get out of receivership, only to turn around and get back in, you know, because boxes were checked, then that's it. It doesn't make it useless. This whole thing was useless.

While the fiscal inducements included in A.B. No. 1840 (Cal. 2018) do not appear to have had the same impact on the school sites as it has on the executive staff and county representatives, it was clear from the interviewees that improvements in salaries would.

Systems Change

The passage of A.B. No. 1840 (Cal. 2018) impacted the transformation of a district in state receivership in many ways, but for those working in and supporting the district, one of the biggest changes has been the shift from state oversight to local county office of education oversight. A.B. No. 1840 (Cal. 2018) is a systems change, fundamentally changing the structure of the governance of a district in receivership. In the State of California (2018), school districts are governed by a board of trustees that are locally elected. This gives oversight of the district superintendent to a neutral board, and it also allows the community to have input on the decision making for their districts. A.B. No. 1840 (Cal. 2018) shifts this form of governance to a sole person, the County Administrator. This removes the oversight of the governing board as well as the community's input on the selection of the decision. It is apparent that this causes the feeling amongst members of the community of losing control, which may result in the trauma impact that requires an appropriate response.

When asked why A.B. No. 1840 (Cal. 2018), a financial trailer bill, included the shift of oversight of a district in receivership, the representatives of a state agency felt that by shifting the oversight to the local level, with closer proximity to the district, there would be more support provided at a quicker pace. It would be easier to have boots-on-the-ground support with a familiarity of the local resources. This was demonstrated by the following statement:

From when [the California Department of Education] oversaw the receivership to when it transferred the county office, what I saw was a better, increased amount of accountability and structure at a local level on a daily basis. This is only my perspective. The CDE may have come in and out, but it wasn't actually hands-on at the local level. With that

partnership, and infrastructure to really make the changes that at least one person, along with the county administrator, determined as priority to really focus on the students. And so, I think that's what I think is a benefit from not having the CDE oversee because we never really put personnel down as support on a full-time basis. By having it changed to the county office, then they were able to create more accountability as a support structure for the district.

Another representative of a state agency made the point that bringing the oversight to the local level, where the county office of education has an ongoing interest in the district, has helped bring more focus to the needs of the district in receivership.

Yeah, so it was an attempt to bring [the district] to a higher level of focus, very candidly, by assigning it to the county superintendent who, in theory, would have more interest in the district's success, have more direct knowledge of the district and its community, than to say, the state superintendent. With that, it is just far away. It doesn't mean that a state superintendent doesn't have an interest in success. They do have an interest in student success, but the idea was pushing it down. More local input from the locals in charge.

Summary of Policy Levers

Throughout the responses to policy levers for change, with the exception of one participant, when it came to the work necessary to transform a district in receivership back to local control, the responses indicated that capacity building was the most important lever. I would argue that in the case of district receivership, the mandates of the policy are extremely important. Many of those involved have not liked feeling that the right to choose is limited, which is often what has happened when given mandates. But in the case of the FCMAT annual

review recommendations, the mandates outline the processes and procedures that will lead to a financially healthy district with improved student achievement. The importance of the messaging around the FCMAT annual review process needs to be emphasized. If the language as a "deficit model" is kept, it will potentially re-traumatize staff and not lead to engagement in the process. With a district that has been in receivership for almost ten years, there needs to be a clear expectation of what needs to be done in order to be returned to local control.

Relationships and Trust

Throughout all the responses, at every level, in each pillar and element of the DTF, the interviewees discussed the importance of relationships and trust. Many people brought up that the most important piece of making change was the relationships. Most importantly, how teachers feel. One representative of a state agency shared, "Because ultimately, everything boils down to that relationship between the teacher and the student. And if we're not protecting that and honoring that and recognizing that in everything we do, we're [going to] miss the mark."

Echoing back to the focus pillar and the purpose of all the work in a school district, a county representative shared:

I've always found in my career, if people know that you have the best interests of students at heart, and people know that you have the best interest of employees at heart, and that you're willing to say no, and do make the tough decisions, because that's what you believe in, they'll do anything for you.

Another county representative shared the importance of being respectful to the community's culture when coming in as an outsider:

And we're imparting our ways on a community that we know nothing about. And so, you know, just the ability to step back and really value what they bring to the table and show them that they do have a voice here, and it's a valuable voice.

We have seen throughout all the interviewee responses that relationships are paramount. In order to establish these relationships and trust, it is important for any outsiders to understand that they are guests in a community. In reflecting on this idea, one county representative warned, "When you bring in people who aren't necessarily from the community and look like the community, who just come in and impose ideas, like, what, what in the world like, who do you think you are?"

The district representatives have suffered the greatest impact on relationships over the years with the constant turnover. One shared:

With the departure of each administrator, here we go again, with someone else who's gonna make us switch gears and focus on something else, which was very much a microcosm of what was going on in the district. So, I really had to focus on building trust.

As stability is being maintained in key leadership positions, and relationships and trust are beginning to take root, one district representative shared:

I think we've got people in place that really work hard and really want the best. And so, I think that with them staying, if they stay, I think that we should start seeing change in that will also one of the major things I think that both educators and both classified and certificated want is stability. I think that is a support in itself. People are here and they're staying, and they want to do what's right for [the district], not just because the state took over one receivership, but because it's the right thing to do for the students. For

the employees. For the community. Everyone. So, I think everyone's trying, honestly. How can you build trust and relationships if you're there for a year? You can't do anything in that amount of time. People are really trying. Some really good stuff is happening. It's just difficult, and then things have to change. Things have to change because we've been so used to doing things a certain way, and we've got a new superintendent. We have a new chief academic officer. They'll be gone next year. Just keep doing whatever because they're gonna split it all again. Why am I [going to] trust you and follow what you're telling me to do? Because you're [going to] leave me, so what?

Focus

Many of the district representatives interviewed had a slight shift in their views of the focus of the movement to local control by A.B. No. 1840 (Cal. 2018). The district representatives noted that with the leadership change with A.B. No. 1840 (Cal. 2018), the accountability moved to a more hands-on approach with the county support team being present for daily monitoring and support of the priorities but also indicated that there are strategic benefits of the local accountability. When asked about the focus of the work as a result of state receivership, one of the district representatives stated:

You know, based on the recommendations of FCMAT and then really talking about evidence and what that evidence would look like, and then how it's compiled and how we are, you know, really thinking strategically around, you know, maybe producing documents that maybe are not part of that evidence list that FCMAT provides us with, but how do we then look at the work and then think strategically about the following year or

upcoming years? And what's required for the division? And then sharing that out during our team meetings so that we can all learn about these effective strategies. So, I feel like the focus of the work has been there, but as a team, we've been able to think strategically about what does that look like on a daily basis? What does it look like to prepare for the [FCMAT] review? And then, more importantly, what does the work look like so that we can sustain the work long term?

Structure

The county offices of education support and oversee certain aspects of the districts within their geographical boundaries, especially those elements related to finance. This has not changed with the passage of A.B. No. 1840 (Cal. 2018). However, the oversight of the elements required by A.B. No. 1840 (Cal. 2018) and the outcomes of the FCMAT annual review shifted from the representative of a state agency to the local county office of education. The shift of oversight of a district in receivership from the state to the local county office of education created many changes in the structure for the district at the center of this case study. It was consistent across that representatives of state agencies that they feel that the shift of oversight by A.B. No. 1840 (Cal. 2018) has helped focus the purpose and the goals of the district and the team supporting it. By bringing the accountability structure closer to the district, there is an increased sense of urgency around the work.

For those interviewed who were supporting the district before and after A.B. No. 1840 (Cal. 2018), I asked about any changes in processes with the passage of the assembly bill. All three of the groups interviewed saw an increase in the district office support with the passage of A.B. No. 1840 (Cal. 2018), as the county office of education developed a support team assigned

to areas based on a systemic review completed by the California Collaborative for Educational Excellence (CCEE).

Representatives of State Agencies

The responses to the interview questions around the shifts of oversight from the passage of A.B. No. 1840 (Cal. 2018) were varied. Some representatives of state agencies who were supporting the district prior to A.B. No. 1840 (Cal. 2018) saw a transition in the way they provided support, whereas others did not experience a change in their structure of support. This varied on the representative and who they saw as the target of their support. If the intended recipient of support prior to A.B. No. 1840 (Cal. 2018) was the student, then the shift of the oversight with the passage of the bill would not impact the collaboration and structure. However, if a representative saw the recipient as the entity with the oversight of the district, then there was a large shift in structure from the state to the county office of education. One state agency representative said:

Well, it's really the district that is who our client is, for all intents and purposes. I mean, on paper our client is [the County Office of Education], but the reality is our client is the district, and our client is ultimately the kids in the district who we want to have a successful experience with.

A different representative of a state agency saw that there was a change in the structure. However, it was not surprising, and it made sense. This representative of a state agency stated:

I didn't have strong feelings about the shift from state superintendent appointed to the county taking it on. I think it was just a logical consequence of plans for this return for local control. And the belief that county offices needed to find their sweet spot in terms

of helping districts, and what better way to get at this than by having them be the oversight entity rather than Sacramento.

County Representatives

As I interviewed those closer to the district, at the county level, the structural change did not appear to be something they expected or planned for. However, many have felt it has been this shift that is leading toward greater consistency in leadership. As stated in the FCMAT annual reviews and throughout the interviews, one of the greatest barriers to the district's transformation and return to local control has been the continual turnover of key leadership positions.

After the passage of A.B. No. 1840 (Cal. 2018), a county office district support team was created based on the assessed areas of need. There were positions added to the central office to support principals, operations, student services, special education, construction, Special Education Local Plan Area (SELPA) finance, data and research, and human resources. As this was a new team created out of A.B. No. 1840 (Cal. 2018), this created a new structure within the district's central office, as well as a new group with whom all those supporting the district have been able to collaborate.

As it gets closer to the schools, the structural changes from the passage of A.B. No. 1840 (Cal. 2018) have been more impactful. One county representative said:

You know, I think one of the things that we know very, very well is stable leadership is essential; it's essential to a district that's running well. And it's even more essential to a district that's essentially dysfunctional. And so, you know, prior to the county takeover, there was this churn of administrators in the district coming in some of them with probably good intentions. But it was just a churn. And I think what we saw at the

beginning was folks who were trying to do everything and did absolutely nothing well.

And so, when the county took over, I think one of the things that [the superintendent] recognized was that it takes fearless leadership, and it takes stable leadership to make change.

At the time of this study, the current county administrator was completing their third year in this position. However, they were responsible for supporting the district from the county office for a year prior to accepting the position as County Administrator. This is the longest that a trustee/appointed administrator has stayed in the position. It can be said that one factor for this stability is the new structure and district office support.

Role of the County Office's District Support Team

With the passage of A.B. No. 1840 (Cal. 2018), when the county office's deputy superintendent took control of the oversight of the district in receivership, they created a district support team at no cost to the district, even though A.B. No. 1840 (Cal. 2018) allowed for district reimbursement. As the county office's district support team entered their third year, they were able to shift the focus of daily work from creating processes and procedures, a one to three on the FCMAT scoring rubric, to the support of the implementation and monitoring, which will have resulted in moving the district's scores on the annual FCMAT review to the desired scores of six and above that is needed to exit receivership and return to local control.

As a member of the team conducting this research, I had the benefit of access to the documents included in the review for the last four years, as that is the time that they began to be collected electronically. Annually, FCMAT gives the district in receivership a list of folders under each of the five support areas (Community Relations and Governance, Personnel

Management, Pupil Achievement, Financial Management, and Facilities Management). See Appendix C for the 2022 Request for Documents for Pupil Achievement. There are thousands of documents that are imputed into the folders and uploaded to FCMAT's SharePoint, based on what the departments feel meets the very brief description of the requests. For each folder, there is a FCMAT annual review standard that it has been indicated. See Appendix D for the sample standard. For the 2022 review, the county office support team held several meetings with the district office personnel to meet in groups to analyze the recommendations of the standards and the connections to the document request lists. Because of the shift to local county office oversight, and the deputy superintendent's (now county administrator's) vision of creating the district support team, there was additional support in place to focus and support with this process.

In the fall of 2021, the district in receivership met with the FCMAT team to review the 2021 Annual Review and discuss the 2022 Annual Review. The feedback was that while there were a lot of documents, the "story" being told was not clear. As a district support team, the idea of having a written narrative for each folder to explain the items that were selected for the folders and the rationale behind the decision was developed and established. See Appendix E. This process allowed the county and district representatives to align the purpose, goals, and focus of their work to the mandates of the FCMAT annual review. Without the systems change by A.B. No. 1840 (Cal. 2018), there would not have been additional support within the district to shift this review process to include the story behind the district in receivership's work.

District Representatives

As the interviews moved to the district level, the structural changes from A.B. No. 1840 (Cal. 2018) made an even greater impact. One district representative stated, "I think it made sense because with the Capitol 400 miles away, it was challenging to have that direct boots-on-the-ground support from the state. So, it kind of felt like a big brother oversight type of thing." Several of those interviewed again raised the theme of the importance of relationships and trust building and how this is more easily developed when one is in close proximity and has knowledge and respect for one's culture. A district representative said:

Our belief systems are different, and the communities we serve are different. You know, no one from San Francisco is going to be able to relate to how [the city] is and so bringing it down to the county where we all reside, every day, in the area every day. It's home to us. And we care about the whole community. When it was the CDE, there was this disconnect. People were traveling down here once a week to check up on the school district and stay in a nice hotel in [a different city] that doesn't tell you who [our district] is.

When the county office of education first took over oversight of the district in receivership, the leadership remained at the county office with occasional site visits. A few months into this model, the deputy superintendent of the county office of education, who later became the county administrator, requested that they be moved full time to the central office of the district in receivership. This decision was made because they felt that in order to support the district's transformation to local control, they needed to be side-by-side with those doing the

work on a daily basis. This again reflects the theme of the importance of relationships and trust building. This was also felt by the district staff, as reflected in this comment:

And so having that local control or the local oversight, I should say the shift from the state to the county has been really critical in this process, because you can't support from Sacramento and also from the County Office perspective. [The leadership needs] to be there in the district, within the community, to be able to do this work effectively and to support us in an effective manner. So that shift has really been helpful because then you're there in the community, and you start to build those relationships, and that's where it begins. When the district was taken over by the state, there was a lot of fear and anxiety amongst the community and, in fact, when the district was taken over by the state, you can see that the district has experienced a significant decline in enrollment. And so, I knew when I looked at that data, and I knew that we needed to really focus on rebuilding trust, and you really do that by building relationships. And so having a team at the district was a goal to rebuild trust, but it's going to start with building relationships, getting to know who the key players are. And really the key players are the parents, the students, the staff, the city, it's the entire community. So that became the strategy. Let's focus on rebuilding trust. Let's heal from this because a lot of people weren't anxious.

At first, some of those in the district saw the shift from the state level to the local level as a political move. However, they felt that even if it were a political move, the district could still benefit from it. A district representative said, "So we were kind of a novelty and everyone's political futures were somewhat tied to the success of it. So, I think it was a good way overall, just so the district could have more local support."

As the local support team grew and began to develop their roles within the district, the daily landscape of the district changed. One district representative said:

I would say there was a noticeable increase in the number of support personnel at the district level. There seemed to be someone from the county office that was assigned to each department. At least one person for each department to provide oversight and support and guidance.

With this increase in physical support and subject area expertise, the district staff was finding that this shift to local oversight was giving them high touch and easily accessible support. A district representative stated, "And so becoming local helped a lot because you have somebody here that you can immediately reach out to when there's a need. People will actually see what's happening in the schools, what are the schools needing."

Supports

With the shift toward local oversight in this case study came increased targeted support for the district in receivership through the county office district support team. This team was designed, at the time, by the county office of education's deputy superintendent. The deputy superintendent hand-picked the members of the team, matching the areas of need according to CCEE's systemic review, and cross-referencing those areas with the areas of deficiency in the annual FCMAT review. Being more familiar with the district and the community and being able to rally local resources quickly and efficiently, has allowed the district to see an impact from A.B. No. 1840 (Cal. 2018) and the shift of the oversight to the local county office of education.

Over this past year, this has been an emphasis for the county office's district support team. This has been a benefit from the shift to local oversight from A.B. No. 1840 (Cal. 2018).

With the creation of the county office's district support team, focused on the FCMAT recommendations, the team has been able to work side-by-side with the district staff, while encouraging the district staff on a daily basis. One county representative said, "I think people can see the support far more so than they did before when the state had receivership."

A district representative experienced an increase in collaboration due to the leadership shifts as a result of A.B. No. 1840 (Cal. 2018). The increased collaboration with the addition of the county office district support team has led to departments who previously felt they were working independently feeling more supported. In a district with less than 8,000 students, the district office supports are often limited as school resources are prioritized. One district representative said:

Prior to AB 1840, the collaboration here was very weak. All the departments seemed to be in silos, and no one really knew what every department should be doing. So having someone like [the county office support] team that is here for [our department] is really helpful because it reminds you how to collaborate with other departments and how much they need you and how much you need them.

Conclusion

The primary research question attempted to gauge the impact of A.B. No. 1840's (Cal. 2018) shift of district oversight from state to county office on the transformation of a district in receivership back to local control. Overall, the findings indicate that at all levels, state, county, and district, the representatives felt that the shift from the state to the county office of education was a positive move for a district in receivership because it brought a more aligned focus,

provided more structure through the development of the county office's district support team to provide additional support to schools, especially in the area of capacity building.

At each level, the focus of the various stakeholders was slightly different; however, at the core of each is the success of the students. At the state and county level, the focus was predominately on the return to local control through a successful completion of the fiscal requirements and FCMAT review process, as set out in A.B. No. 1840 (Cal. 2018). However, at the district level, and especially at the site level, the focus is on student achievement and safe and welcoming campuses through a culture of care.

The structure of the district is focused on collaboration and district office support for school sites. Representatives of the county and state both shared that the most important members of the school community are at the school site, the principals and teachers. They both felt that their effort was best served at the district office. By building the capacity and developing systems at the central site, they felt that then those executive level staff members would be better equipped to serve the sites. This was a difference with the district personnel. A couple of them expressed that with the FCMAT review process, it feels that the sites exist to serve the district office. It was their impression that there is not a connection between the recommendations of FCMAT and the schools' priorities of raising student achievement. It will be the work of future teams to find the alignment between FCMAT and the site leaders' priorities.

There have been many supports put in place for the transformation of the school district out of state receivership, as a result of A.B. No. 1840 (Cal. 2018), focusing on capacity building, reorganization, and continuous cycles of improvement. At every level, the support always returned to capacity building. The reorganizations that have occurred in departments have been a

result of a cycle of inquiry, while maybe not called that by the interviewees, requiring capacity building. In addition, the sentiment that until the staff is trained, supported, and allowed collaborative time, they will not be able to make the shifts necessary in the FCMAT annual review recommendations.

There were four policy levers for change that were studied: capacity building, mandates, inducements, and systems change. Throughout all levels of representatives, the most impactful lever of change on the work of transforming the district back to local control was capacity building, with only one interviewee citing mandates.

Throughout all the responses, in each of the three pillars of the district transformation framework, focus, structure, and support, the respondents mentioned the role of trust, relationships, and consistent leadership. While this is a finance trailer bill, these are not notions that are necessarily included in this type of policy. But if at every level, every representative is mentioning the importance and impact of having a culture of care, it should be considered how this can become a part of policy. When studying the demographic information of the districts in receivership, and the impact of state receivership on a district, trauma informed practices for the district at a systemic level justifiably cannot be excluded. This is discussed further in Chapter 5.

CHAPTER 5

DISCUSSION AND IMPLICATIONS

The purpose of this research was to study a small section of A.B. No. 1840 (Cal. 2018), which was a part of the California movement toward more local control of school finances and decision-making. The goal was to complete a case study of a district that has been in receivership for over nine years, using the district transformation framework and policy levers for change, to see the impact of the shifts to local oversight, with the intention of learning lessons that can be shared with other districts in receivership. When I started this work, I considered what Brian Backstrom (2019) gave as the three criteria needed for success in school turnaround including allowing for flexibility, the need for strong leaders with the freedom to act, and commitment and willingness to not stay with the status quo.

As I developed the research questions, I leaned on the work of Fullan and Quinn (2016), Honig and Hatch (2004), and McDonnell and Elmore (1987) to develop the district transformation framework. Honig and Hatch (2004), like Fullan and Quinn (2016), saw the work of coherence as a social construct between all stakeholders. Through this research, the social construct became much more prominent than I expected.

The overarching research question for this study was: How has the passage of A.B. No. 1840 (Cal. 2018) impacted the transformation of a school district that has been in receivership under state oversight and moved to the local county office of education oversight? Subquestions were as follows:

 What is the focus of the various stakeholders involved in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?

- What is the structure of the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- What are the supports put in place in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?
- Which policy levers for change have been most successful in the transformation of a district in state receivership as a result of the passage of A.B. No. 1840?

Discussion of Findings

I would argue that the state receivership process is a social justice issue. Of the districts that have been in receivership in the State of California, all nine have had 66.5% or higher of their student population categorized as socioeconomically disadvantaged, with five of the nine having a student population of 86.6% or higher of socioeconomically disadvantaged (California Department of Education, 2021b). One cannot separate state receivership and high poverty districts.

Overall, the findings indicate that at all levels, which includes the state, county, and district, the representatives felt that the shift toward local oversight from the state department of education to the county office of education for a district in receivership was a positive move as it raised the priority of the district's needs to the county office of education, allowed for a quicker response, and led to the development of an on-site district support team focused on meeting the recommendations of FCMAT.

At the state, county, and district levels, the focus of the various stakeholders was slightly different. However, they were all variations of having a successful district with students and staff who are learning and feeling successful. At the state and county levels, it emerged from the

interviews that the priority was meeting the budget requirements of A.B. No. 1840 (Cal. 2018) as well as the recommendations of the FMCAT annual review. While the school representatives acknowledged the importance of meeting the FCMAT recommendations, there was little connection between those recommendations and the locally designed goals. All three levels of representatives discussed the structure of collaboration as central to their work, as well as the role of the district office for supporting the school sites. Within the support pillar, many interviewed did not see a connection to reorganization or continuous cycles of improvement, but I would argue that the work that is being done as recommendations from the FMCAT annual review are just this. However, capacity building, a third element of the support pillar, was very important to the interviewees. Throughout the interviews, on all three pillars, the themes of relationships and trust emerged within the responses.

The four policy levers for change that present in A.B. No. 1840 (Cal. 2018) and used as part of the district transformation framework (DTF) included capacity building, mandates, inducements, and systems change. Throughout the levels of representatives, the interview participants felt that the lever of change that had the largest impact on their work in transforming a district is capacity building.

Throughout all the responses, in each of the three pillars of the District Transformation Framework (focus, structure, and support), the respondents mentioned the role of trust, relationships, and consistent leadership. The success of the policy is dependent on those who are responsible for interpreting and enacting the policy (McLaughlin, 1987). And while most who I interviewed stated that the mandates of A.B. No. 1840 (Cal. 2018) were important, policy does not have the ability to mandate what matters to leaders (McLaughlin, 1987). McLaughlin said:

We have learned that policy success depends critically on two broad factors: local capacity and will. Capacity, admittedly a difficult issue, is something that policy can address. Training can be offered. Dollars can be provided. Consultants can be engaged to furnish missing expertise. But will, or the attitudes, motivation, and beliefs that underlie an implementer's response to a policy's goals or strategies, is less amenable to policy intervention. (McLaughlin, 1987, p. 172)

Therefore, motivation and will are outside of the policy's reach (McLaughlin, 1987).

After the 16 interviews, and an emphasis on capacity building, mandates, and inducements, I have seen the need to conduct additional research on the will of leaders, and how do we create communities of care to support our leaders as they do this work necessary to transform a district and move out of state receivership. Weatherley and Lipsky (1977) defined the term "street-level bureaucrats" as those who "interact daily with citizens in the course of their jobs and have substantial discretion in the execution of their work" (Weatherley & Lipsky, 1977, p. 172). Our site leaders are the street-level bureaucrats in a school district, and we need to make sure they are equipped to do the work necessary to transform a district back to local control.

The first pillar of the district transformation framework is focus, with the elements of purpose, goals, and accountability. When one is starting transformation, it is important that all stakeholders are clear on the question of why. Each member should define their purpose and their goals within the transformation, as well as how they will hold themselves and others accountable (Fullan & Quinn, 2016). It can be argued that while there may be a policy that defines the "why," each stakeholder at each level of the organization may have their own focus.

It is important for one to know their own focus as well as that of others. By doing so, one will have a better understanding of the policy levers used to motivate the change.

When I began my work in this district, and my subsequent research, I expected that the focus and priority of all of those interviewed would ultimately be getting released from state receivership. I was surprised to learn that the initial request to be considered for receivership came from the teacher's union seeking help from the state. One interviewee stated, "The teachers were actually saying: bring on a state administrator." It was initially assumed that everyone in the district wanted their independence from the state and the county, but I learned that, especially at the district level, the focus has not been on the mandates and recommendations as outlined in the FCMAT annual review but in real substantive change. One interviewee said, "I'm not concerned with what's on paper, checking boxes, because if we get out of receivership, only to turn around and get back in because boxes were checked, and that's it, it makes it useless. This whole thing was useless."

Honig and Hatch (2004) argued that the traditional model of focusing on schools and central offices using the external demands to strengthen student performance ignores the political and subjective realities of the actual implementation of the policies, which leads to unrealistic goals. Instead, Honig and Hatch (2004) found that coherence is a process in which school and central office leaders find ways to accommodate the fit between the external demands and the school's own goals and objectives. Through the research questions, it is seen that the state and county representatives have the same focus: student success. However, the pathway there is viewed differently. State and country representatives have viewed the FCMAT recommendations as an outline of processes and procedures that will lead to success. Alternatively, the district

representatives have felt the FCMAT annual review process is a compliance item. An important next step is for the support teams to work with the site administrators to see where their goals can be found in the FCMAT recommendations so that the site leaders can see the connection and shared vision.

These findings highlight the research around improving low-performing schools rather than closing them. This research adds to the discussion at the district level when considering whether to bring external operators for district turnaround (Therriault, 2016). One of the most important factors in school turnaround is the collaboration of highly effective teachers and leaders (Le Floch et al., 2016). When it comes to leadership, it is important to have a leader who is characterized as transformative and can motivate the staff toward the shared vision (Redding & Nguyen, 2020). In addition, it is important for the leader to define and solve problems, develop solutions to the problems of practice, have perseverance, and demonstrate a commitment to student learning (Redding & Nguyen, 2020). For a district in receivership, the FCMAT annual review process does just this. It defines the problems and offers solutions through the recommendations. Then it is up to the teams to have the perseverance to complete them.

Both this research and the work of Honig and Hatch (2004) assert that, as schools interact with the external demands of the FCMAT recommendations, they must engage in a process of bridging and buffering. Bridging activities invite or increase interaction with external demands while buffering activities limit those interactions (Honig & Hatch, 2004). One way to bridge external demands is to leverage them in order to advance internal goals (Honig & Hatch, 2004). The development of the county office's district support team has supported this process for the district in this case study. This team has expertise in the FCMAT recommendations and can help

the district staff prioritize the action items and assist with developing the policies and procedures, as well as building the capacity of the district's team.

On the opposite end, schools may buffer themselves from external demands in strategic and limited ways (Honig & Hatch, 2004). This allows the organization to focus without being impacted by negative feedback (Honig & Hatch, 2004). An organization may also engage in a hybrid process of both buffering and bridging by adopting the external demands in a symbolic gesture but not allowing them to impact the day-to-day operations (Honig & Hatch, 2004). This was reflected in the interviews with a district representative, who stated:

And there's areas where FCMAT is even extremely valuable on nuanced things. So, I'm not suggesting you toss it by any means, but if your primary source of direction, or your North Star is FCMAT, you're not going to make the growth. FCMAT is good at affirming or confirming what needs to be done.

Structure

Once the focus of the district transformation has been identified, the second pillar of the district transformation framework is structure. This pillar helped to shape and define who will do the work and how it will be done. It is important that this work is not done in isolation but that it is collaborative and done in partnership with others (Fullan & Quinn, 2016). In the case of district transformation, it is extremely important to focus on the role of the Central Office in its support of the school sites (Honig & Rainey, 2020). As the principals are the school site changeagents, the district office must be seen as a supportive partner (Honig & Rainey, 2020).

At every level of those interviewed, collaboration was highlighted as a part of the regular work. With the move from state oversight to local oversight, several people reported that there

was an increase in county-level collaboration and support due to the close physical proximity to the county office. In addition, the county office is even more linked to the success or failure of the district in receivership. One interviewee offered, "They want to see that we're making progress. They're holding us accountable. But at the same time, we're able to ask for support as we need it." And another said:

[The shift to local oversight] was an attempt to bring it to a higher level of focus. By assigning it to the county superintendent that, in theory, has more interest in the district and its community than to say the state superintendent.

This notion that the community is important, and that it is important for leadership to hear from the community, not just direct them in a top-down approach, connects to the research on loose and tight couplings by Fusarelli (2002). This research did not perceive the more tightly coupled policies as a top-down only approach; rather, in order to have successful reform, the strategies must be both top-down and bottom-up (Fusarelli, 2002). The building of capacity is essential to sustain any reform initiatives (Fusarelli, 2002). This is especially true for a district that has been in receivership for ten years. The success of the policy is dependent on those who are responsible for interpreting and enacting it (McLaughlin, 1987). Policy does not have the ability to mandate what matters to leaders (McLaughlin, 1987). It is therefore important to have leaders who understand the urgency and have the ability to meet the recommendations of the FCMAT annual review. A.B. No. 1840 (Cal. 2018) shifted the oversight of a district in receivership "down" from the state to the county level. Moving the authority to a leader who is a part of the community, with daily support on site and a part of the district leadership teams, has

allowed for the top-down and bottom-up approach that Fusarelli (2002) recommended for successful implementation of policy.

Supports

The third pillar of the DTF is support. It is important that all levels of the organization define what they will be doing to support the transformation process. In other words, to determine how each member will build the capacity of those whom they support, the ways in which the organization will be reorganized and re-cultured to support the schools and the focus, and what the evidence will be of the continuous cycles of improvement of the work and the relationships with schools (Honig & Rainey, 2020).

When asking the interviewees about the capacity building of those whom they support, the responses were unsurprising. The state supports the county; the county supports the district office; the district office supports the school sites. The school sites support the staff and students. One state representative struggled with this notion, as their belief system supports that the most important influence on a school site is the leader. They struggled with their support going to the county and district office but understood that this was the current model.

One representative who was interviewed said:

When you look at the research, when you look at what really changes our competence, it is what's happening in the classroom, bottom line. What's happening in schools? What's happening in classrooms? And so, school leaders are an important part of that.

This reflects back to what Backstrom (2019) expressed, that by ensuring schools have the right leadership focused on quality instruction through participating in continuous cycles of improvement, establishing high expectations, and holding all stakeholders accountable,

turnaround schools and districts will begin to deliver the quality education the most marginalized communities deserve. The FCMAT annual review is a cycle of inquiry organized to do just this.

Levers for Change

For this research, I was able to analyze all the responses about supports by looking at McDonnell and Elmore's four policy levers for change: providing resources and training (capacity building), inducements (incentivizing participation and action), mandates, and systems change (McDonnell & Elmore, 1987). If these levers are mapped against the district transformation framework, it is evident that mandates help to define a district's focus. According to those interviewed, capacity building can be seen as having a great effect on structure, as capacity building is at the root of collaborative relationships and support of the district offices. However, what came across in most interviews was that the lever for change that has had the greatest motivation on the work that people do with support is relationships. And while not called out as an individual pillar or lever for change, the importance of relationships is woven through each pillar of the district transformation framework.

Implications and Recommendations

Conceptual Framework Implications

The quote, "People don't care how much you know, until they know how much you care," has been attributed to many people over the years, including President Theodore Roosevelt, John Maxwell, Earl Nightingale, and others. The author is not as important as the message. The impact of relationships and cultures of care were not one of the original policy levers for change in the district transformation framework, and there is a gap in this literature review around this. Elmore (2003) said:

Schools, then, might be "changing" all the time, adopting this or that new structure or schedule or textbook series or tracking system, and never change in any fundamental way what teachers and students actually do when they are together in classrooms. (p. 283)

The research made it clear that the districts that have been in receivership in the State of California, all nine have had 66.5%, or higher, of their student population categorized as socioeconomically disadvantaged, with five of the nine having a student population of 86.6%, or higher, socioeconomically disadvantaged (California Department of Education, 2021b). It is hard to separate state receivership and high poverty districts. Those living in high-poverty areas, such as the one in this district in receivership, have suffered trauma. Trauma refers to an adverse experience that impacts one's ability to cope or leaves them feeling powerless (Margolius et al., 2020, p. 3). It is estimated that between one-half and two-thirds of all young people have experienced at least one adverse childhood experience (ACE), where children from marginalized, underserved, and impoverished communities experience ACEs at a higher rate, and with more severity (Margolius et al., 2020). Broadly, trauma-informed practices:

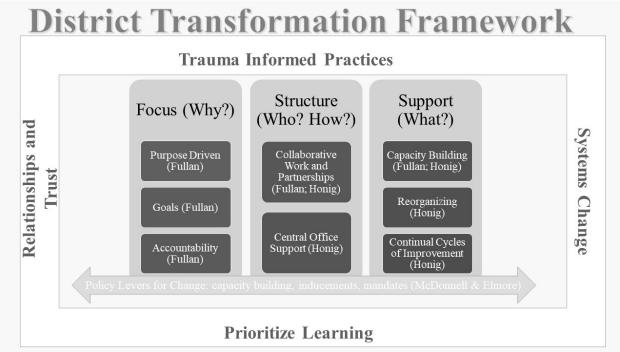
- Are grounded in understanding the whole child, recognizing that the experiences of a young person in one developmental setting reverberate across other settings.
- Focus on building positive, caring relationships as a means to mitigate the effects of trauma.
- Target multiple developmental domains—addressing the social, physical, emotional, and cognitive impacts of trauma—rather than just one distinct dimension of development. (Margolius et al., 2020, p. 4)

When working with students using trauma-informed practices to create a culture of care, it is recommended to create a supportive learning environment with collaborative relationships where school leaders recognize the whole child and their strengths and needs (Margolius et al., 2020). According to Margolius et al. (2020), this is accomplished in several ways. First, one can support professional learning for all school staff, not just those who specialize in mental health, on the effects of trauma exposure. Leaders can create practices focused on building trust and caring relationships throughout the school community, including all school partners. Staff can avoid policies or practices that might re-traumatize students, such as suspensions, expulsions, or active shooter drills. Schools can foster physically and psychologically safe learning spaces for all members of the school community. It is important to strengthen and develop collaborative relationships. Equity must be realized as an organizing principle needed to better support students and be part of the conscious effort to understand those whom they support without using a deficit model. Equitable cultures must be created where all team members prioritize learning about their students, especially those who are at greater risk of traumatic stress. It is also imperative to reflect on the practices being utilized and the ways in which they align with student's lives. If these strategies are actively resisted, then the risk of re-traumatizing students or staff stands to increase (Margolius et al., 2020).

When looking at these practices, the same themes are present that emerged from the research: collaborative relationships, trust, not using a deficit model, and prioritizing learning. These practices need to be considered in the capacity of supporting districts in receivership, acknowledging the trauma that occurred with the process, and explicitly developing a plan to create a culture of care that runs alongside the FCMAT

recommendations. A culture of care must become a priority that is assessed on an annual basis along with the practices surrounding the work in the district transformation framework (see Figure 4).

Figure 4Revised District Transformation Framework



Note: Adapted from "Coherence: The Right Drivers in Action for Schools, Districts, and Systems," by M. Fullan and J. Quinn, 2015, copyright 2015 by Corwin Press; "Coherence Making: How School Leaders Cultivate the Pathway for School and System Change with a Shared Process," by M. Fullan and J. Quinn, 2016, in School Administrator, pp. 30-34, https://www.scoe.org/files/Fullan_Quinn.pdf., copyright 2016 by School Superintendents Association; "Supervising Principals for Instructional Leadership: A Teaching and Learning Approach," by M. I. Honig and L. R. Rainey, 2020, copyright 2020 by Harvard Education Press; "Crafting Coherence: How Schools Strategically Manage Multiple, External Demands," by M. I. Honig and T. C. Hatch, 2004, in Educational Researcher, 33(8), pp. 16-30,

https://doi.org/10.3102%2F0013189X033008016, copyright 2004 by American Educational Research Association; and "Getting the Job Done: Alternative Policy Instruments," by L. M. McDonnell and R. F. Elmore, 1987, in *Educational Evaluation and Policy Analysis*, 9(2), pp. 133-152, https://doi.org/10.3102%2F016237370090 02133, copyright 1987 by American Educational Research Association.

Implications for Districts in Receivership

The implication of these findings can not only be applied to districts in receivership but can serve as a reminder to all districts that are looking to transform through policy implementation. As noted previously, motivation and will, outside of mandate, are beyond the

policy's reach (McLaughlin, 1987). Inducements are a policy tool to motivate people to change by incentivizing certain behavior. Mandates are meant to motivate people out of "compliance." Capacity building can be said to motivate staff to do things that they did not know how to do before by providing them with the tools, resources, and skills to do so. But will, attitudes, motivations, and beliefs are at the heart of the work in education, according to all those interviewed in my research. So, while *will* cannot be legislated like mandates, capacity building, inducements, and systems change can be developed through collaboration with trusting relationships.

Most research on accountability policy has focused on the effects of the initiatives on student achievement (Spillane et al., 2002). Accountability policy initiatives have included at least two components: specific student performance outcomes and rewards and sanctions for schools (Spillane et al., 2002). Spillane et al.'s research (2002) concluded that it is important to understand the role of school leaders in the process as not only does the policy shape the school, but the school leader shapes the policy implementation as the implementing agent and agency. School leaders are the intermediaries between teachers and the district office and therefore must gain and maintain legitimacy with both (Spillane et al., 2002). School leaders are charged with creating the working and learning environments at schools. Further, school leaders are the ones who can create a culture of care at their sites, characterized by having the collaborative and trusting relationships needed for transformation to occur.

A culture of care, fueled by trust, can be established as a district; however, it is the school site where one can find the most direct impact on student achievement. And the site leader has the greatest impact on the school site. The site leaders, following the district's guidelines, present

and monitor the goals and purpose of the work. Honig and Hatch (2004) offered that in order to achieve the goals, a site leader can engage in the following:

Schools setting school-wide goals and strategies that have particular features; schools using those goals and strategies that have particular features; schools using those goals and strategies to decide whether to bridge themselves to or buffer themselves from external demands; and school district central offices supporting these school-level processes. (p. 1)

To do this, the school leaders must not only have a clear understanding of policy mandates but also their school culture.

To address the limitations of this study, future research should work to explore topics and trends that emerged from the data. Additional research focusing on other districts in receivership would allow for more information that would enhance the findings of this study. It would offer the chance to compare and contrast the experiences of those involved to further validate these findings. Essentially, duplicating this research would offer a greater scope and understanding of the impact of receivership on the school district.

An additional area that should be further explored is that of the lens of the community. There were instances in interviews where a "veil of shame" or stigma from being in a district in receivership was expressed. Understanding the role and impact that being in receivership has had on the community would be an interesting and enlightening area to further study. Focusing on community members, businesses, families, and students in order to gain their perspectives would allow for a greater understanding of how being in such a district has impacted their decision making.

I would further recommend that future research lean into understanding what this process has been like from the school staff. Much of this research focused on county, state, and district leadership. Yet, the most important relationship is that between the teacher and student. It would be meaningful to learn how being in receivership has impacted teacher's morale and pedagogy. Doing so would allow for a deeper understanding of what could be done to provide more support for them.

Implications on Policy and Practice

Based on the research and findings from this case study, I would make the following recommendations for practice to be incorporated into the state receivership process, as laid out in A.B. 1200 (Cal. 1991), S.B. 533 (Cal. 2012), and A.B. No. 1840 (Cal. 2018). These recommendations are broken down by state, county, and district levels.

State Level

At the state level, I would first recommend continuing the current model with having direct oversight by the local county office of education. As seen in this research, 15 of the 16 people identified that capacity building was the most important of the four policy levers for change that were presented. By creating a team of experts who are in the district on a daily basis, as this district did, the county office of education is able to support the district in creating the processes and procedures to mitigate the deficiencies found in the FCMAT reviews.

This is because the local County Office of Education has historical knowledge of the school district. In addition, due to the close proximity, there is a better understanding of the culture within the community. The proximity further allows those within the community, both professionally and those living within, more direct access to leaders and resources at the county

level as compared to otherwise being further removed. The county office should continue with the oversight that exists as part of the current model. In order for districts budgets to get passed initially, they go through the County Office of Education. Because of this, they are already scrutinizing and reviewing budgets, which supports the county office continuing to have oversight as opposed to the state.

I would further recommend at the state level that portions of the FCMAT annual reviews be reassigned. There are currently five sections reviewed, and it would be beneficial to have the Pupil Achievement section be completed by the California Collaborative for Educational Excellence (CCEE). FCMAT, as of 2022, conducted a review regarding pupil achievement, and while they are able to hire experts, they are a financial body, which creates limitations. If CCEE were to conduct this review, it would allow for a deeper inspection of what supports are necessary for student achievement because they are an agency whose sole purpose focuses on this topic.

Further, CCEE, as of the time of this study, conducted their own annual reviews on student achievement as it was mandated by A.B. No. 1840 (Cal. 2018). If CCEE were to take over the Pupil Achievement portion of the review from FCMAT, it would alleviate the duplication that has been fostering feelings of fatigue that stem from needing to complete additional work. It is clear that doing reviews on the same topic for both FCMAT and CCEE takes time away from other areas of focus. Inglewood in particular is audited frequently, so streamlining this portion of the review process would take a burden off involved staff.

County Level

At the county level, I would recommend that each district develop an annual plan to create a culture of care that is assessed and monitored in a similar way to the other FCMAT recommendations. The office of education should develop and fund district support teams in order to serve the areas of need as identified in the FCMAT annual review. Essentially, the model employed at Inglewood should be expanded to all districts in the state receivership process. County oversight has allowed for consistency that has brought with it stronger outcomes. The oversight from a team of experts from different areas, including student services, operations, and child welfare and attendance, allows for the program to be more successfully implemented. This is largely because turnover among school staff is quite common, which hinders the ability for the school itself to have the same level of expertise.

A second recommendation at the county level is that a trauma-informed lens be used when entering and supporting a district in receivership. It is far better for both school staff and students to feel as though they are treated empathetically to build trust. These teams need to work in the first year to establish relationships, ask questions to better understand the situation, and make it clear that this is a long-term process that will be successfully achieved together. To do so, all county teams must be trained properly. There needs to be more deliberateness with how these teams approach the schools within the districts in receivership. An explicit onboarding process where the role of each support team member is defined, an overview of whom is being served is provided, and a strategic plan should be established. There must also be training on trauma informed best practices. It is vital for success that such an approach is taken in order to ensure these teams are effectively able to build a strong relationship. The results of this research

showed that the state and county priorities are those items that are mandated. Therefore, the development of a culture of care, using trauma-informed practices, should be mandated for each district in receivership.

District Level

At the district level, the relationship needs to be bridged between the district office support team and the site administrators. This is because the site administrators are the most important on campus as they are the ones creating the leadership vision. It is important that the areas of focus and priorities from within FCMAT are read and understood by all parties. Without allowing the district support team and the site administrators the opportunity to see the findings and learn about what has already been completed, it becomes more challenging to implement meaningful changes as relationships have been properly established. The district support teams instead need to be given the opportunity to speak with site administrators to examine the lens of the recommendations, provide praise and other feedback, and inquire as to how they can be most supportive to align the vision for the campus through the FCMAT recommendations.

I would further recommend at the district level that both human and physical capital be used to support the retention of leadership and enhance the onboarding process. When turnover rates are high, it is difficult to establish strong relationships amongst staff. A component that might help mitigate departures could be through an onboarding process that allows for people to feel more confident in their jobs and that they are doing well. Providing such a service would make leaving for a different opportunity seem less desirable and would ultimately reduce turnover. This would then allow for stronger working relationships to be established that create a culture and atmosphere where coworkers become more invested in each other and their school.

Future Research

The information gleaned from this study uncovered multiple areas where additional research would be beneficial. Upon reflection, I would have liked to ask additional questions around recommendations from the district representatives. I am curious to know their thoughts on the way that the receivership process was introduced to the district. I would like to know what they see as the impact of the receivership process on their *will* as an educator, specifically about when an outside entity gains control of a district. I would also like to hear how the district office and the County Office District Support Team can better support them so that they feel better equipped to fulfill the recommendations of the FCMAT review.

To the site administrators, I would like to know how the District Office can support in buffering the mandates of the FCMAT reviews so that they are able to concentrate on the work that they need to do on a daily basis to run their school. I am curious about how the District Office and County Office District Support Team can help to bridge the FCMAT review recommendations and the focus and goals at their site level. It would also be important to better understand how has the systems change of district oversight impacted their ability to lead their school community.

To the district representatives, I would like to know the advice they would give to other districts who are entering State Receivership. I feel it would be important to know that the lessons they have learned about being in state receivership that they would like to share with districts that may go into receivership in the future. And finally, I would like to know what they would like to tell state and county representatives about how to best support districts as they work to be exited from state receivership.

Conclusion

As a leader for social justice, I chose this research as I feel it is significant for us to study the lessons we learn in receivership so that others can benefit from the learning in the future. It is hard to separate state receivership and high poverty districts. As one interviewee said:

So academic achievement is crucial because. I want my students to be able to be able to do everything that everybody else is doing and it not be a struggle. I think that our students should have everything that a top public or top private school has. They should have access to everything. I don't care what your zip code is. I don't care what your family's financial background is. As a student, you should have access to that.

These students deserve nothing but the best, but when the district is spending significant amounts of money to pay back loans and fund costly reviews, some of which extend over decades, this is money that is not going to children to improve their learning and school experience.

From this research, findings, and recommendations, if the process for a district to return to local control after being in state receivership can be improved, if that district is returned with students who are successful and achieving at the same rate as their peers, if the district that is deeply rooted in a culture of care is fostered, then not only will these students be impacted, but the future generations will as well. As one interviewee shared:

And by doing that, we are raising people, little people. We are going to raise these little people to be good citizens, who are going to help other people. So, our work will be on this. And it's important for my staff to know that to remember why they're here. Here is to our little people!

APPENDIX A

FCMAT Scoring Rubric

Not Implemented (Scaled Score of 0): There is no significant evidence that the standard is implemented.

Partially Implemented (Scaled Score of 1 through 7): A partially implemented standard has been met to a limited degree; the degree of completeness varies as follows:

- Some design or research regarding the standard is in place that supports preliminary development. (Scaled score of 1)
- Implementation of the standard is well into the development stage.
 Appropriate staff are engaged, and there is a plan for implementation.
 (Scaled score of 2)
- A plan to address the standard is fully developed, and the standard is in the beginning phase of implementation. (Scaled score of 3)
- Staff are engaged in implementing most elements of the standard.

 (Scaled score of 4)
- Staff are engaged in implementing the standard. All standard elements are developed and are in the implementation phase. (Scaled score of 5)
- Elements of the standard are implemented, monitored and becoming systematic. (Scaled score of 6)
- All elements of the standard are fully implemented and are being monitored, and

appropriate adjustments are taking place. (Scaled score of 7)

Fully Implemented (Scaled Score of 8 through 10): A fully implemented standard is complete and sustainable; the degree of implementation varies as follows:

- All elements of the standard are fully and substantially implemented and are sustainable. (Scaled score of 8)
- All elements of the standard are fully and substantially implemented and have been sustained for a full school year. (Scaled score of 9)
- All elements of the standard are fully implemented, are being sustained with high quality, are being refined, and have a process for ongoing evaluation. (Scaled score of 10)

APPENDIX B

Interview Questions

Background Information: 1. What is your current role in or supporting the district in receivership? 2. If you have held previous roles in or supporting the district in receivership, what are they? 3. How long have you worked in or supporting the district in receivership? 4. How many years have you worked in education? 5. Did you work with or support the district in receivership prior to A.B. No. 1840? 6. Did you work with or support the district in receivership after the passage of A.B. No. 1840? **Focus:** 1. State receivership is defined as the district declaring a fiscal crisis and is unable to meet its multi-year financial obligations. California uses state receivership to address schools in fiscal insolvency. How is this similar to how you have seen as the purpose of state receivership?

Backg	round Information:
1.	What is your current role in or supporting the district in receivership?
2.	How familiar are you with the changes in leadership in the district in receivership after
	the passage of A.B. No. 1840?
3.	Within your scope of work to support the transformation of the district in receivership,
	what are your goals in relation to A.B. No. 1840?
	. (If interviewee worked in/for the district in receivership prior to September
	2018) How have they changed since the passage of A.B. No. 1840?
2.	What is the process for holding your team accountable in regard to A.B. No. 1840 and
	the district in receivership?
	a. Internally?
	b. Externally?
	c. How do you hold schools accountable?
	d. How does the community hold you accountable?
	e. How do schools hold the district office accountable?
	f. If interviewee worked in/for the district in receivership prior to September
	2018) How has that changed since the passage of A.B. No. 1840?

Background Information:
1. What is your current role in or supporting the district in receivership?
Structure:
1. With whom do you collaborate or with whom do you partner in order to support the transformation of the district in receivership?
a. (If interviewee worked in/for the district in receivership prior toSeptember 2018) How has this changed since the passage of A.B. No. 1840?
b. **Probe about collaboration
1. How does the district in receivership District Office support the schools in the district transformation process?
. A. (If interviewee worked in/for the district in receivership prior to September 2018) How has that changed since the passage of A.B. No. 1840?
b. **Probe about the impact of that support, if there is some noted
Support:

Background Information:

- 1. What is your current role in or supporting the district in receivership?
- 1. How do you build the capacity of those whom you support in the district in receivership transformation?
 - a. (If interviewee worked in/for the district in receivership prior to September 2018) How has that changed since the passage of A.B. No. 1840?
- 2. What reorganization have you led or been a part of as you have supported the district in receivership transformation?
 - a. (If interviewee worked in/for the district in receivership prior to September 2018) How has that changed since the passage of A.B. No. 1840?
- 2. How have you participated in continuous cycles of improvement, e.g. analyzing assessment data to plan next steps, as you have supported the district in receivership in the transformation?
 - a. (If interviewee worked in/for the district in receivership prior to September 2018) How has that changed since the passage of A.B. No. 1840?

Background Information: 1. What is your current role in or supporting the district in receivership? **Policy Levers for Change:** 1. This policy A.B. No. 1840 has many mandates, such as, to what degree does that motivate your work? How? Why? 2. This policy A.B. No. 1840 has capacity building, such as, to what degree does that motivate your work? How? Why? 3. This policy A.B. No. 1840 has inducements, such as, to what degree does that motivate your work? How? Why? 4. For you, what motivates the work the most in the district in receivership transformation process?? How? Why? 5. What motivates the work of those whom you support the most in the IUSD transformation process? How? Why? 6. What more would you like in order to feel more motivated in your work? 7. How do you feel about your capacity to do the work that is being asked by A.B. No.

1840? If you don't, how can you be more supported?

Background Information: 1. What is your current role in or supporting the district in receivership? Conclusion: 1. Is there any additional information you would like me to know?

APPENDIX C

FCMAT Pupil Achievement Document Request List

Inglewood Unified School District Pupil Achievement Document Request List Fieldwork: March 21 – 25, 2022

Please upload all documents, using the item numbers and titles below, to FCMAT's SharePoint document repository by March 1, 2022. PLEASE UPLOAD EACH DOCUMENT ONLY ONCE. If you have additional documents that are not on the list, please identify each of those uploads with the standard it will address (i.e: Std. 1.1). No additional name is necessary – we will review and name accordingly. If the additional documents address more than one standard, please load that document once and reference both standards in the name (Std. 1.1 and 2.1).

	Document(s)	Standard(s)	"Suggested" title in SP^
*	If folder name is provided, please use the folder already set up in SP and then place the document within that folder using the suggested title. If there is no folder information provided, please upload into Client Supplied Support Documents simply by its suggested title in SP.		
001	The district's 2021-22 budget with enough detail included to review allocation plans for categorical and compensatory program funds by site as well as specific programs.	1.1, 1.5	1. Budget
002	Written calendar(s) for 2021-22 that have been established for development of budgets/plans that are aligned to measurable student outcomes.	1.1	2. Budget calendar
003	Monitoring plan(s) developed for 2021-22, with evidence of implementation (e.g., e-mails, training documents, meeting agendas, etc.), to ensure that school site plans are aligned to measurable student outcomes.	1.1	3. Monitoring plan

	*		
004	Written guidance from the central district office to school sites (e.g., e-mails, training documents, meeting agendas, etc.) during 2021-22 providing guidance on budget allocations.	1.1	4. Budget guidance
005	Evidence of evaluation of the effectiveness of 2020-21 categorical funds to measure the impact and return on the use of funds, as well as any evaluations performed to ensure that the use and results of categorical programs are providing measurable growth in student achievement.	1.1, 1.6	5. Evaluation of categoricals
006	The district's mechanism to ensure that categorical and compensatory program funds are coordinated adequately to supplement, not supplant, services and materials provided by the district; copies of any state and federal compliance reviews.	1.1	State compliance Federal compliance
007	Agreements with independent contractors for educational services for the 2021-22 fiscal year.	1.1	7. XXXXX(contractor name-upload each separately)
008	Documentation of the district's process for 2020-21 and/or 2021-22 to ensure that implementation and execution of policies occur consistently in all district schools.	1.2	8. Policy implementation
009	Listing of each school site council for 2021-22, with enough detail to understand the composition of each (i.e., teachers, parents, students, and the site principal). *Do not combine schools – each school should have one file with its name.	1.2	*Folder – SSC 9. School Name (i.e. Hudnall) SSC
010	School site council meeting agendas and minutes from April 2021 to March 2022. *Do not combine schools – each school should have one file with its name.	1.2	*Folder – SSC 10. School Name (i.e. Hudnall) Agendas
011	2021-22 school site plans for all district schools. *Do not combine schools — each school should have one file with its name.	1.2	*Folder – SPSA 11. School Name (i.e. Hudnall)

012	Evidence of educational initiatives the district has implemented. This could include communication artifacts, e.g. memos, professional development materials, agendas with topics and time allocations, administrative/teacher work products, student work products demonstrating implementation of the initiatives. Please provide any evaluations of the educational initiatives, if available, from	1.4	12. Initiatives 12. Evaluation of Initiatives
	April 2021 through March 2022.		
013	Listing of professional development provided to site principals/administrators from April 2021 through March 2022.	1.4, 1.5, 1.6, 1.8, 2.3, 3.16, 4.3, 4.4, 4.5, 4.10, 5.1, 5.4	*Folder – Prof. Dev. 13. List of prof dev for admin.
013a	Evidence of each professional development provided to site principals/administrators for the 2021-22 fiscal year (e.g. sign-in sheet, content presented, time allocations, PD materials). Also, any evidence of implementation of these PDs (e.g. any subsequent PD provided by principals/administrators to another audience, agendas with topics and time allocations, PD materials, administrative work products generated through professional development sessions)	1.4, 1.5, 1.6, 1.8, 2.3, 3.16, 4.3, 4.4, 4.5, 4.10, 5.1, 5.4	13a. Title of PD – audience (ie: 13a. Observation data – principals)
014	Current staff listing for the district office and school sites, compared to the previous review, to understand whether consistent leadership and staffing is in place.	1.4	*Folder – Staff Info. 14. 17-18 District Office or School Name 14. 16-17 District Office or School Name

015	Artifacts demonstrating implementation of the process the district office used for the 2021-22 school year to ensure that the principals are identifying and using instructional strategies to improve student achievement (e.g. logs of executive director/principal visits and walk through observations of targeted instructional strategies, follow up action plans for strengthening instruction).	1.4, 4.10	15. Principal Accountability
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	3		
016	The district's academic priorities for the 2021-22 fiscal year and how they are incorporated in the district's program budget.	1.5	16. Academic priorities
017	Agendas, content, materials and time allocation of professional development provided to teachers for the 2021-22 school year and any evidence of implementation (e.g. work products generated through professional development sessions, walk through observation summaries/records documenting classroom application of PD strategies, PLC meeting summaries/action plans documenting planning and implementation of PD strategies)	1.6, 1.8, 2.5, 3.13, 3.16; 4.3; 4.4, 5.1, 5.3	*Folder – Prof. Dev. 17. List of prof. dev. for teachers
018	Evidence that principals are monitoring and evaluating teachers' use of pacing in the classroom during the 2021-22 school year (e.g. walk through observation artifacts documenting monitoring/evaluation process, follow up teacher conferencing/evaluation documentation, relevant staff meeting agendas).	1.6, 4.10	18. Pacing
019	The district's instructional support processes, staff and procedures in place to ensure improved student achievement, and any evaluations performed to ensure that the funds utilized for instructional support are used effectively and efficiently for the 2021-22 school year.	1.6	19. Instructional support
020	Any new job classes or updated job descriptions since the prior review (April 2021) including those for instructional technology.	1.8, 4.4	20. New job classes 20. Updated job descriptions

021	Information on which staff member(s) are responsible for ensuring that teachers and administrators use data provided by the student information system and any other resource (e.g. Illuminate) to make decisions on instruction and the use of curriculum during the 2021-22 school year. Include artifacts documenting administrative and instructional staff use of student performance data to make instructional decisions such as PLC summaries, action plans, district and site-based staff meeting agendas and data analysis documents.	1.8	*Folder – Assess. Data 21. Illuminate BM 1
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022	The 2021-22 plan/schedule for evaluating principals and whether the evaluation requires administrators to be held accountable for the academic achievement of their students.	1.8	22. Evaluation schedule
023	The 2021-22 actual process and form used to evaluate principals. *Please provide samples of the entire year's evaluations for at least 5 principals with suggestions for improvement (names redacted).	1.9	23. Principal evaluations
024	The 2021-22 actual process and form used for teacher evaluations/observations.	1.9	24. Teacher evaluations
025	Evidence that systems of support have been created and implemented for the 2021-22 school year so that site principals can build teachers' capacity to provide high quality instruction that will lead to student learning and achievement. Include artifacts documenting support provided to principals (e.g. records/summaries of Executive Director meetings and other district administrative meetings, walk through/observations, coaching records, post observation conference summaries, professional development materials)	1.9, 4.10	25. Systems of support
026	Changes made to the collective bargaining agreement with the bargaining unit representing certificated personnel during the last reporting period (April 2021 – March 2022).	1.9	26. CBA changes

027	Process used so that teachers identify areas in the district-adopted text that provide students with challenging activities, especially with the implementation of Common Core State Standards.	2.1	27. CCSS
028	Changes to the list of adopted textbooks, grades 1-12 for 2021-22 since April 2021.	2.1, 3.15	28. Adopted textbooks
029	Identification of assessments and materials used for all tiers of academic intervention (e.g. intervention schedules, artifacts documenting ongoing assessment/progress monitoring of students receiving intervention support).	2.1, 3.16, 4.5	*Folder – Interventions & ELD 29. Intervention materials

030	Process used by site principals and other site leaders during the 2021-22 school year to ensure that instructional delivery provided by teachers is improving, and that appropriate follow-up is occurring. Evidence such as walk through/observation schedules, summary documents, staff and PLC agendas with time allocations relevant to improving instructional delivery, summaries of follow-up communications, post observation conference notes, improvement/action plan examples.	2.3, 4.10	30. Accountability
031	Process and schedule for principals during the 2021-22 school year to engage in frequent classroom walk-through visits, announced and unannounced, with an understanding of what the principals are reviewing and identifying (see 030 above).	2.3, 3.15, 4.10, 4.12, 5.3	31. Classroom observations
032	Process of how principals communicate feedback after walk-through visits of classrooms during 2021-22 (see 030 above).	2.3, 4.10, 5.3	32. Feedback
033	The district's process of re-examining and use of benchmark formative assessments during the 2021-22 school year. Evidence documenting implementation of the process such as district and site analysis summary documents, district and site action plans developed based on data analysis.	2.3, 2.4, 4.3, 4.4	*Folder – Assess. Data 33. BM assess

03	34	Process used by principals and teachers during the 2021-22 school year to ensure that students understand the importance of state and local assessments.	2.3	*Folder – Assess. Data 34. Importance of Assess
03	35	Process and schedule used by district-level administrators, principals and teachers to analyze state and local assessment results to identify students' strengths and growth areas during the 2021-22 school year. Evidence documenting implementation of the process such as district and site analysis summary documents, district and site action plans developed based on data analysis.	2.3, 2.4, 4.3, 4.4	*Folder – Assess. Data 35. Assess Analysis
03	36	2021-22 LEA plan.	2.3, 5.5	*Folder – LCAP & LEA plan 36. LEA Plan

037	State and local student benchmark assessment results; state and local student benchmark data reports for 2021-22. Evidence such as full complement of aggregate and disaggregated assessment data summaries for all district required assessments, including district and site level percentage of students completing the assessments.	2.3, 3.16, 4.3, 4.4	*Folder – Assess. Data 37. BM results Oct. 2020
038	2021-22 district comprehensive assessment calendar.	2.4, 4.4	*Folder – Assess. Data 38. Assess. Calendar
039	An explanation/outline so that FCMAT can understand who is involved in the periodic assessments and what the assessments are correlated to.	2.4	*Folder – Assess. Data 39. Assess. Outline

040	Type of assessment data that is available from Illuminate, or any other resource (please provide actual reports with assessment data). Evidence such as full complement of aggregate and disaggregated assessment data summaries for all district required assessments, including district and site level percentage of students completing the assessments.	2.4, 3.16, 4.3, 4.4	*Folder – Assess. Data 40. Illuminate data
041	Changes to the district's technology plan and progress made since the last review (April 2021).	2.5	41. Technology plan
042	Changes in the district's technology department in terms of staffing, job classes, and job descriptions since April 2021.	2.5	42. Technology dept.
043	Support and resources provided to the Director of IT during the 2021-22 school year to facilitate the implementation of a district-wide technology plan.	2.5	43. Support for tech. plan
044	Training and resources provided, as well as how process is implemented, to staff members during the 2021-22 school year to ensure that a commitment is made and implemented to equally serving the needs and interests of all students, parents, and family members.	3.1	44. Equal access

045	Information on which schools have bilingual staff members in the front office.	3.1	*Folder – Staff info. 45. Site front office
046	Evaluation system in place during the 2021-22 school year to ensure that the rigor of courses adequately prepares the students for graduation and higher education.	3.6	*Folder – HS and Grad. Info. 46. Evaluation system

047	Any changes to the district's graduation and A-G requirements during the 2021-22 school year.	3.6	
	2021-22 school year.		Grau. Injo.
			47. Grad Req.
048	For each high school and continuation high school: Lists of courses by school	3.6, 3.7,	*Folder – HS and
	site; master list of course offerings and teacher assignments (master schedules)	3.22	Grad. Info. 47. Grad Req. 47. Grad Req. 48. Master schedule – School Name (i.e. MHS) 49. Electives – School Name (i.e. MHS) 49. Electives – School Name (i.e. MHS) 50. ICHS Evaluation 47. *Folder – HS and Grad. Info. 50. ICHS Evaluation 50. ICHS Evaluation 51. *Folder – HS and Grad. Info.
	at each school; career/course plans of study at each school; alternative routes to		48. Master schedule -
	graduation requirements at each school		School Name (i.e. MHS)
049	For each high school and continuation high school: Lists of elective courses	3.6, 3.7,	*Folder – HS and
	by school site.	3.22	Grad. Info.
			49. Electives – School
			Name (i.e. MHS)
050	Evidence that the district evaluated the academic program delivery at	3.7	*Folder – HS and
	Inglewood Continuation High School during the 2021-22 school year and any		
	changes made since the last review (April 2021).		50 ICHS Evaluation
			Jo. ICHS Evaluation
051	Progress in increasing student expectations in the Inglewood Continuation	3.7	*Folder – HS and
	High School for the 2021-22 school year.		Grad. Info.
			51. ICHS Expectations
			•

052	Credit recovery statistics which include sites, dates, number of students and names of teachers during the 2021-22 school year or as of completion of 2020-21 school year.	3.7	*Folder – HS and Grad. Info. 52. Credit recovery
053	Information regarding any district Saturday school attendance recovery program since April 2021.	3.7	53. Saturday school

054	Comprehensive local plan for special education for the 2021-22 school year.	3.10	*Folder – SpEd Info. 54. Local plan
055	Procedures/programs and schedules of internal monitoring to ensure compliance with special education policies and procedures during the 2021-22 school year.	3.10	*Folder – SpEd Info. 55. Policies monitoring
056	Processes on how the Special Education Department monitors monthly student identification rates during the 2021-22 school year.	3.10	*Folder – SpEd Info. 56. I.D. rate monitoring
057	Information by school site of how many students have been referred and identified for special education for the 2021-22 school year, and how that compares to identification rates for the prior year.	3.10	*Folder – SpEd Info. 57. Referral & I.D. rate
058	Changes to the Special Education policies and procedures since April 2021. Process or procedures to communicate, provide and monitor that district/staff continue to adhere to all newly implemented special education policies, procedures and other requirements during the 2021-22 school year.	3.10, 3.12, 4.12	*Folder – SpEd Info. 58. Changes to policies
059	District procedures used during the 2021-22 school year, including who is involved, when identifying students for special education.	3.10	*Folder – SpEd Info. 59. Procedures for identifying
060	Processes on how special education referrals are tracked and measured against students eligible for special education to determine their validity. Changes only since April 2021.	3.10	*Folder – SpEd Info. 60. SpEd referral tracking

	Benchmarks for student achievement for special education students in math and English/language arts. Changes only since April 2021.	3.10	*Folder – SpEd Info. 61. SpEd BM results	
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062	Process that the district has used during the 2021-22 school year to evaluate school sites that have over-identified special education students to ensure compliance with district procedures. Evidence that principals have been included in the monitoring of this information.	3.10	*Folder – SpEd Info. 62. Over-identification
063	Teacher assignments for instruction of students with disabilities by school site for the 2021-22 school year.	3.10	*Folder – SpEd Info. 63. SpEd teacher assignments
064	Examples of benchmarks for student achievement based on the percentage of proficiency targets for special education students in math and English/language arts during the 2021-22 school year.	3.10	*Folder – SpEd Info. 64. SpEd BM targets
065	2021-22 schedule of IEP meetings	3.12, 3.15	*Folder – SpEd Info. 65. IEPs meetings
066	Processes that involved district staff, site principals, and teacher leaders in the development of a common definition of "student engagement in learning" and to clarify what students "should be able to do to demonstrate their knowledge and skills at each grade level" during the 2021-22 school year. Evidence includes artifacts from district and site meetings addressing engagement, including agendas and professional development materials or summaries of discussions regarding engagement, written communications relevant to engagement.	3.13	66. High expectations
067	Listing of current principal assignments notating any changes since the last review.	3.13	*Folder – Staff Info. 67. Principals

068	Evidence that practices have been re-evaluated since the last review to increase the accountability of administrative, certificated, and classified staff in support of quality instruction for students.	3.13	68. Accountability
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069	Processes used during the 2021-22 school year for reviewing student performance on state and benchmark assessments in the evaluation of employee performance.	3.13	*Folder – Assess. Data 69. BM review processes
070	Processes used during the 2021-22 school year to train teachers in the implementation of Common Core State Standards, and an explanation of the support provided to teachers (i.e. collaborative planning time) to implement 21 st Century learning strategies in classrooms.	3.13	*Folder – Prof. Dev. 70. Title – audience
071	Documents that describe the district's Response to Intervention (RTI) program, including the SST process, details on intervention tiered structure, format, assessment and instructional materials for each level of the system.	3.15	*Folder – Interventions & ELD 71. RTI changes
072	District's expectations and measures of accountability for implementation of RTI and ELD. (see 071 above)	3.15	*Folder – Interventions & ELD 72. RTI accountability 72. ELD accountability
073	Processes for placement of SWD and ELL programs at school sites, as well as individual student and class placements.	3.15	73. SWD placements 73. ELL placements
074	Processes for holding principals and teachers accountable for implementing accommodations required for SWD, ELL, and other underperforming students during the 2021-22 school year.	3.15	74. Accountability
075	School-wide schedules at school sites identifying when ELD, intervention classes, and mainstreaming of SWD occur for the 2021-22 school year.	3.15	*Folder – Schools Info. 75. School Name (i.e. Hudnall)

076	Understanding of how principals ensure that intervention programs occur regularly and are effectively implemented during the 2021-22 school year. Evidence includes intervention schedules, training for teachers including professional development materials, student identification and progress monitoring procedures, student performance data and other artifacts of implementation.	3.15, 3.16, 4.5	76. Principals and intervention- School Name (i.e. Hudnall)
077	District's activities during the 2021-22 school year with regard to a comprehensive review of the available assessment systems. Documentation of district level evaluation of full implementation of current written system and utility of data the system yields for the variety of stakeholders and action plan for continuous improvement of comprehensive assessment system classroom level through district systems.	3.16, 2.4, 4.3, 4.4	*Folder – Assess. Data 77. Assess. Review
078	Artifacts documenting analysis and review of assessments used for placement, intervention and acceleration, conclusions/action steps to increase effectiveness and use in district and site decision-making, communication documents regarding the use of these assessments.	3.16, 4.4, 4.5	*Folder – Assess. Data 78. Policies for assessments
079	Processes of how district staff and site principals review English learner data (e.g. California School Dashboard ELPI data) to ensure that the language development and academic needs of English language learners are being addressed.	3.17	*Folder – Interventions & ELD 79. ELPI data
080	Changes since the last review on how the district clarifies the expectations for English language learners regarding placement in ELD classes, considering ELPAC results.	3.17	*Folder – Interventions & ELD 80. ELL placement
081	Changes since the last review on how English language learners and reclassified students are monitored (R-FEP) to ensure they continue to make academic progress.	3.17	*Folder – Interventions & ELD 81. ELL and RFEP monitoring

082	Processes for holding principals and teachers accountable for complying with state and federal regulations on instructional support for English language learners during the 2021-22 school year.	3.17	*Folder – Interventions & ELD 82. ELL support in classroom
083	District's 2021-22 LCAP	3.17	*Folder – LCAP and LEA Plan 83. LCAP
083a	District's 2021-22 LCFF Budget Overview for Parents	3.17	*Folder – LCAP and LEA Plan 83a. Budget Overview
083b	District's 2020-21 Learning Continuity and Attendance Plan	3.17	*Folder – LCAP and LEA Plan 83b. Learning Cont. Plan
084	Reports from any other entity during the 2021-22 school year regarding the district's ELD program including but not limited to those issued by LACOE.	3.17	*Folder – Interventions & ELD 84. ELD reports – LACOE
085	Job description for any position that has been added to help support improving student learning.	3.18	85. Job description – title
086	Changes made since the last review to ensure that the degree of execution and delivery of the programs and courses are consistent from school to school.	3.22	86. Consistency
087	Changes made since the last review to improve rigor in the classrooms.	3.22	87. Rigor

088	Documentation on district efforts to discuss the importance and use of data at school sites during the 2021-22 school year. Artifacts from administrative and site staff meetings such as handout materials, summaries, and action plans generated through discussions.	4.3	*Folder – Assess. Data 88. Use of data
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089	List of district level individuals and departments responsible for implementation and analysis of formative and summative assessments for the 2021-22 school year, written description of district expectation for analysis and use of data generated by these assessments at the district and site levels.	4.3	*Folder – Assess. Data 89. Data analysis
090	Description of how data resources (e.g. Illuminate) have been implemented in a way to allow teachers and principals access to periodic assessment data. Evidence includes artifacts documenting implementation such as administrative and staff meeting agendas, handouts/PD materials, memos regarding expectations for assessments to be used and how they are to be used, PLC documents, sample action plans with follow up evaluations of effectiveness of assessment and data analysis system.	4.3	*Folder – Assess. Data 90. Data analysis
091	Job description/clarification of which position is responsible for ensuring that teachers and administrators use the data provided by the SIS and other data (e.g. Illuminate) systems for the 2021-22 school year. (see 090 above)	4.4	*Folder – Assess. Data 89. Data analysis
092	Information on which student assessments have been reviewed by district administrative team and when information from that review was discussed with/disseminated to principals to discuss at faculty meetings for the 2021-22 school year. (see 090 above)	4.5	*Folder – Assess. Data 89. Data analysis
093	District policy specifying which assessments are to be utilized, as well as when, how often, and how they should be used during the 2021-22 school year. (see 090 above)	4.5	*Folder – Assess. Data 89. Data analysis

094	Agendas and minutes from 2021-22 district meetings where principals have been given a forum in a professional learning community setting allowing discussions on identifying challenges, sharing ideas, and formulating "next steps" to improve the delivery of program content and the quality of instruction. Evidence to include discussion summary/conclusion documents, including any identified action steps/follow-up steps, and handout materials.	4.10	94. Principal forum
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094a	Agendas and minutes from 2021-22 where district leadership meet in a professional learning community setting to analyze student achievement/assessment data, reflect, identify challenges, share ideas and formulate action plan to improve the delivery of program content and the quality of instruction. Evidence to include discussion summary/conclusion documents, including any identified action, steps/follow-up steps, and handout materials.	4.10	94a. District leadership PLC
095	Written communication documents regarding expectations, procedures and accountability, including feedback and ongoing monitoring expectations for district staff and principals during the 2021-22 school year for time spent observing instruction each week. Evidence to include samples of walkthrough/observation documents, schedule and summary of Executive Directors' (elementary and secondary) walkthroughs with principals, including analysis discussions and follow up/monitoring steps.	4.10	95. Observations
096	Understanding of how the district has helped principals increase their focus on instructional leadership by clarifying expectations and providing support to them to minimize non-instructional distractions during the 2021-22 school year. (see 095 above)	4.10	96. Instructional leadership
097	List of professional training during the 2021-22 school year provided to principals in determining how to minimize discipline issues and other interruptions that provide support to their role as instructional leaders.	4.10	*Folder – Prof. Dev. 97. Title of PD – intended audience

098	Changes since the last review (April 2021) of how internal monitoring of special ed. procedures/programs/schedules occur.	4.12	*Folder – SpEd Info 98. Internal monitoring
099	Schedule and agendas/minutes of specific in-service sessions at each school during the 2021-22 school year where staff reviews special ed. policies/procedures in specific areas identified as needed by principals. Provide PD/handout materials provided as part of implementation.	4.12	*Folder – Assess. Data 99. SpEd PD
100	Understanding of who is responsible for completing spot reviews of school site special ed. policies and procedures during the 2021-22 school year.	4.12	*Folder – Assess. Data 100. Site reviews

101	Information (i.e. advertisements/agendas/minutes) and the district's process of scheduling professional development opportunities during the 2021-22 school year that include a) an analysis of data to determine what training is needed, b) clear expectations for attendance by appropriate groups, c) ongoing follow-up on implementation of strategies learned, and d) identification of "next steps" for further training and refinement of skills. Provide handout materials from PD; documentation of site-based follow up to initial PD sessions; any grade/department level follow up (e.g. PLC minutes, action plans relevant to implementation of PD, lesson plans, observation artifacts relevant to PD implementation, classroom-level coaching); evidence of district level and Executive Directors' (elementary and secondary) ongoing site-based discussion and monitoring of PD implementation with principals.	5.1	*Folder – Prof. Dev. 101. Process for PD
102	Copy of the 2021-22 district-wide annual professional development calendar. Include information on whether items on the calendar are mandatory or not, and what consequences, if any, occur if staff do not attend. (see 101 above)	5.1,5.5	*Folder – Prof. Dev. 102. Annual PD calendar

103	Information of what monitoring, support and feedback by supervisors have occurred during the 2021-22 school year to ensure that strategies shared and taught during professional development opportunities are being implemented in classrooms. (see 101 above)	5.1	*Folder – Prof. Dev. 103. PD monitoring
104	2021-22 calendar and information on Common Core State Standards implementation district wide.	5.1	104. CCSS
105	Listing of which professional development providers/consultants have been chosen for the 2021-22 school year, including if RFPs or RFO's were sought prior to selection. For those providers that have been chosen, provide a listing of what professional development they were contracted to provide.	5.1	*Folder - Prof. Dev. 105. PD Providers (if there are many, please load contracts individually by name of contractor)
106	Sign-in sheets, or other evidence of attendance, used to track teachers' attendance at professional development trainings during the 2021-22 school year.	5.1	*Folder – Prof. Dev. 106. PD teachers

107	Listing and explanation of how new site principals are provided support and training during the 2021-22 school year. Include Executive Directors' (elementary and secondary) logs of communication, support, site visits to support principals, PD materials specific to new principals, coaching logs, summaries of other relevant activities/discussions.	5.1	*Folder – Prof. Dev. 107. PD new principals
108	2021-22 school calendar; district testing calendar	5.3	108. Testing calendar

109	Schedule of what release time for teachers at school sites have been provided during the 2021-22 fiscal year to discuss, identify and analyze, by department and/or grade level, with the principal, a) the results of state and local student performance data, b) the changes needed in the instructional program to provide additional support to students, and c) the support needed by the site principal.	5.3	*Folder – Assess. Data 109. Data analysis
110	Information on what progress has been made (i.e., next steps and necessary support) during the 2021-22 school year in measures of accountability based on what was "learned" during discussions with teachers during scheduled release time.	5.3	*Folder – Assess. Data 110. Data analysis accountability
111	Steps taken by the district to ensure that professional development programs are ongoing, rather than a single-workshop format. Changes only since April 2021.	5.5	*Folder – Prof. Dev. 111. Ongoing PD
112	Evidence that principals and teachers have opportunities to practice what they are learning during professional development offerings and receive appropriate feedback. (see 101 and 103 above)	5.5	*Folder – Prof. Dev. 112. Principal PD practice
113	Steps taken to provide principals with ongoing leadership development training so they can provide feedback to teachers. (see 95 and 96 above)	5.5	*Folder – Prof. Dev. 113. Principal leadership PD
114	Evidence of continuum of professional development options and formats for specific instructional and administrative personnel in 2021-22.	5.5	*Folder – Prof. Dev.

17 114. PD Comprehensive plan

115	Process to monitor and evaluate the effectiveness of professional development providers/consultants' services during the 2021-22 school year.	5.5	*Folder – Prof. Dev. 115. Provider PD effectiveness
116	Information on how the district's Aeries database is updated with student information. Changes only since April 2021.	6.1	116. AERIES
117	Board policies and administrative regulations available online. Please submit a sheet listing any BPs or ARs with changes since April 2021.		117. Board policy changes
118	Board agendas, packets and minutes for all meetings held from March 2020 through March 2021. Available online.		118. Board packet – March- 2017
119	2021-22 Schools Directory		*Folder – Schools Info.
120	2021-22 roster of district office staff		*Folder – Staff Info.
121	Map and bell schedule for each school site (map should include label of grade or subject for each classroom, even if hand-written).		*Folder – Schools Info.

APPENDIX D

Pupil Achievement Standard 3.10

3.10 Instructional Strategies

Legal Standard

The LEA has adopted systematic procedures for identification, screening, referral, assessment, planning, implementation, review, and triennial assessment of students with special needs. (EC 56301)

Findings

- 1. The district chief academic officer directly oversees special education and has remained in place since the last review, although special education leadership has changed during this review period. The district hired a new executive director of special education in the Fall of 2020. This position oversees the administrator of compliance who began in September 2018. The district continues to have a critical need for stable special education leadership support. Changes in leadership have created obstacles in appropriate implementation and monitoring of policies and procedures.
- 2. The district worked closely with CCEE and Pivot Learning Partners to review and update the entire special education procedural manual, which was state administrator-/advisory board-approved on February 20, 2019. The Special Education Department provided FCMAT schedules listing monthly special education training topics for the 2020-21 school year, which focused on certain procedures from the manual including writing individualized education plans (IEPs), conducting defensible assessments, and holding IEP meetings. The training schedule included the participants targeted and agenda topics, but no sign-in sheets or list of participants were provided.
 - 3. Compliance has been a continued area of focus for the special education leadership team. The district reported using an IEP checklist to internally monitor IEPs to ensure compliance. The district explained program specialists are responsible for identifying IEP checklist trends, and then presenting and discussing those with special education teachers and related service

providers. One agenda for a program specialist meeting held on January 29, 2021 was provided to FCMAT and included a discussion on IEP compliance and a list of the number of overdue, unsigned and unaffirmed IEPs. Given the obstacles related to conducting IEP meetings virtually due to the COVID-19 pandemic, district staff reported a backlog of overdue IEPs. FCMAT was provided IEP progress reports

for 4 months of this reporting period; reports indicated the districtwide number of upcoming annual IEPs by month, the number of overdue IEPs (e.g., annual/30 days, triennial assessments, initial assessments, unsigned IEPs, and unsigned amendments), a list of overdue annual IEPs by school site and charts with the number of overdue IEPs over time. District reported data indicates the number of overdue IEPs (annuals and triennials) dropped from 176 in September of 2020 to 72 in February of 2021. Additionally, the district provided sample e-mail communication from the Special Education Department's administrator of compliance to site principals and special education staff with data reports on the number of overdue IEPs.

- 4. The district was required by CDE to address element 5b: LRE-Regular Class less than 40% of the Annual Performance Report in their 2019-20 Special Education Plan. The district identified the root cause for the LEA's performance level specific to Element 5b indicated incomplete assessments for initial and triennial IEPs that were not held within the 60-day timelines allowed for improper placements of students in the LRE.
- 5. Each school site is required to use the online SST system for managing referrals and progress of struggling students, although interviews indicated that not all use the online software, and implementation of the SST process and tool is inconsistent across the district with only four principal questionnaires indicating use of the online SST system. i-Ready continues to be used as a universal screening and progress monitoring tool across Grades TK-8. For Grades
 - 7-12, Achieve 3000 has been required to be administered three times a year, although how sites use the results varies. The online SST system requires recording of interventions used with a student, but because there are inconsistencies in the type of interventions offered at various school sites, significant numbers of underachieving students are still referred to special education with little to no documented interventions. A few

school sites reported conducting limited or no SST meetings during the reporting period due to the COVID-19 pandemic while other sites reported continuing to conduct SST meetings virtually.

Recommendations for Recovery

- 1. The district should continue to focus on complying with IEP timelines through IEP progress reports to monitor upcoming annual IEPs by month, and the number of overdue IEPs (e.g., annual/30 days, triennial assessments, initial assessments, unsigned IEPs, and unsigned amendments). The Special Education Department's administrator of compliance should continue to communicate and provide data reports indicating the number of overdue IEPs for site principals and special education staff. The district should hold site administrators and staff accountable for following all assessment timelines for initial and triennial IEPs, and any noncompliance should be reflected in evaluations.
- 2. The district should focus on supporting and retaining special education leadership so it can systematically implement its long-term plans for this program.
- 3. The Special Education Department should provide annual training for all site administration and special education staff to implement the content of the updated special education procedural manual. Because of the high attrition rate in the district, training should be ongoing and systematic with all district personnel involved with special needs students on the policies and procedures contained in the manual. Site-level leaders should advocate for any needed training for their special education staff. Once staff are trained, these leaders should hold site staff responsible for the full implementation of these district policies and procedures, and any noncompliance should be reflected as an area for improvement in evaluations.
- 4. The district should continue to focus efforts in scheduling assessments and IEPs and accountability for monitoring the compliance of assessments, IEPs and transition plans. It should evaluate the causes leading to

noncompliance and focus training on the reasons most identified. The district should utilize program specialists to assist in training site

staff, as well as continue their assistance in the scheduling and monitoring of IEPs.

It should also continue to hold site administration accountable for monitoring and facilitating this process at their school sites. Additional support should be provided to school sites that have noncompliance numbers that are persistently high, with a specific analysis as to what is producing the high numbers. When noncompliance issues are identified as originating with particular personnel and within their control, a focus on improvement should be reflected in their evaluation.

5. Because the district expectation is that all sites will use the online SST process, the district should ensure that additional training is offered where needed and all sites should be

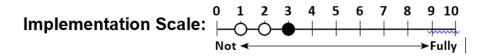
held accountable for its use. Continue to use i-Ready as a tool for universal screening and progress monitoring in Grades TK-8. If used effectively, the i-Ready data could be used to support initial placement in a special education program. The district should continue to use Achieve 3000 for Grades 7-12, focusing training on how to use the results consistently across the district as intervention for struggling students.

- 6. The district should provide training/professional development to all teachers, focusing on strategies to support struggling students and the interventions that should be offered in the general education classroom prior to any referral for an SST that could lead to possible special education placement.
- 7. The district should continue having the executive director of special education attend the monthly principals' meetings to increase the level of communication between school sites and special education leadership. This will continue to help district administration to identify areas of concern on either side and allow them to facilitate resolution when needed.

8. The special education administration should continue to track referrals monthly and compare them to students who qualified as eligible for special education to determine if referrals are valid, look for trends in students qualifying as well as sites that may be over- referring students for special education instead of offering appropriate interventions.

Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3



APPENDIX E

Narrative



Pupil Achievement

056- Processes on how the Special Education Department monitors monthly student identification rates during the 2021-22 school year

3.10- Instructional Strategies

The Special Education Department created an assessment referral in the fall of 2019. All of the school site staff were trained during compliance training in the fall of 2019.

In considering the assessment request process, The Request for Assessment Form indicates the necessary information needed for placement decisions.

School Psychologist meetings are held monthly. Each month, the administrator reviews the current initial and triennial assessment request data, as indicated on the agendas with the SEIS screenshots. This is done with each psychologist sharing out their caseloads.

Beginning in November 2021, the Special Education Department formalized this process by creating a spreadsheet for the school psychologists to complete on a monthly basis. During the monthly meetings, the following questions are asked:

- Any patterns?
- Any target schools?
- Schools using SST/MTSS?
- · Any patterns of overidentification?

Based on these responses, targeted support is provided.

For example, in January 2022, after a review of referrals, there was an increased number of assessments at Centinela. The Executive Director of Special Education immediately assigned additional support, and scheduled a meeting with the Principal to provide administrative support.

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