THE COMPLIANCE GAP

5 Questions Every District Should Be Asking

About your attendance data — before the next CDE ASSIST cycle

By Vikrant Duggal

Why this exists

California clawed back $29.5M from expanded learning programs in the most recent reduction cycle. Not for bad programs. For bad data.

Every year, CDE reviews whether ASES and 21st CCLC sites hit their attendance targets: 85% over two consecutive years, 75% in any single year. Miss it and your grant gets cut to match what you actually tracked, plus a small cushion. The money does not come back.

Meanwhile, nearly a million California students were chronically absent last year. ELOP funding now exceeds $4B statewide. And most districts still track expanded learning attendance on paper sign-in sheets, spreadsheets, or systems disconnected from their SIS.

In our work reviewing 1,000+ districts, most cannot answer Question 1 without asking someone to pull a report. There is a gap between the compliance your funding requires and the data your team actually has. This checklist helps you find it.

QUESTION 1

Can you tell me, right now, which of your sites are below 75% of their ASES attendance target?

This is not a trick question. It is the single-year threshold that triggers a CDE funding reduction. If you cannot answer it without asking someone to pull a report and come back to you, you have a visibility problem. Most districts discover they are below threshold after the CDE ASSIST submission, not before.

What to look for

A real-time or weekly view of actual attendance against targeted attendance, by site, that someone in your district office can open without asking.

QUESTION 2

For your dual-funded sites, how are you allocating student attendance between ASES and 21st CCLC?

Per EC 8483.7, attendance must first fill the state ASES grant to 85% of its target before any attendance can count toward 21st CCLC. A student cannot be reported to both grants on the same school day. Getting this wrong creates both an audit finding and a grant reduction.

What to look for

A documented procedure your team follows — not a judgment call made by whoever enters the data.

QUESTION 3

What happens when a student is enrolled in your expanded learning program but stops showing up?

ELOP requires you to offer the program to eligible students. ASES requires those students to actually attend. When a student drops off, most districts do not know until a monthly or quarterly review. By then, the site's attendance percentage has already fallen, and the parent outreach that might have brought them back is months late.

What to look for

A trigger — not a calendar reminder — that flags declining attendance at the student level before it becomes a site-level compliance problem.

QUESTION 4

Can your attendance data survive a Fiscal Crisis review?

FCMAT field reviews and CDE monitoring visits do not ask whether your program is good. They ask whether your records prove it. Sign-in sheets with missing signatures, timestamps that do not match program hours, and enrollment records that do not reconcile with attendance logs are the most common findings. The remedy is always the same: prove it or return the money.

What to look for

Every attendance record tied to a student ID, a program, a date, a check-in time, a checkout time, and a staff member. If any of those fields are blank or reconstructed after the fact, that is where the auditor will start.

QUESTION 5

Who in your district is responsible for making sure these four things are true?

In most districts, the answer is "it is split across three or four people, none of whom have it as their primary job." The expanded learning director runs the program. The data clerk enters attendance. The business office submits the ASSIST report. The superintendent signs the assurances. Nobody owns the compliance gap between program delivery and funding documentation.

What to look for

One person (or one system) with a view across enrollment, daily attendance, funding thresholds, and reporting deadlines. If that does not exist, the gap is structural — and it will persist regardless of how good your programs are.

Score yourself

For each question, mark where your district stands today. Two or more "No" answers usually means the gap is already costing you — you just have not measured it yet.

Question	Yes	Partial	No
Can you name sites below 75% of ASES target right now?			
Dual-funded sites have a documented ASES-first allocation procedure?			
Declining student attendance triggers outreach before site averages fall?			
Attendance records would survive a Fiscal Crisis / CDE review?			
One person or system owns enrollment, attendance, thresholds, and deadlines?			

What comes next

These five questions are adapted from The Compliance Gap, a new book by Vikrant Duggal exploring the space between what California's expanded learning programs deliver and what their funding requires them to prove. Launching January 2027.

If one of these questions made you uncomfortable, you are not alone. The gap is real, it is expensive, and most districts do not discover it until after the money is gone.

Attendly helps California districts close this gap — but these questions apply whether or not you use our platform.

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