January 9, 2026

To: Dr. Linda Darling-Hammond, President
Members of the State Board of Education
Tony Thurmond, Superintendent of Public Instruction
Brooks Allen, Executive Director

From: Carlos Machado, Legislative Advocate

RE: Comments on the January 14, 2026, State Board of Education Agenda

Dear Dr. Darling-Hammond,

Thank you for the opportunity to comment on the State Board of Education (Board) Agenda.

Item 2: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Study Session on the College/Career Indicator.

The California School Boards Association (CSBA) wishes the Board to consider how the CCI can be a useful tool to assist in prioritizing targeted, resourced strategies that help close the readiness gaps, especially for foster youth, students with disabilities, and students experiencing homelessness. These disparities would benefit from a coherent state-focused approach that supports and complements the work that school districts and county offices of education are doing to close these gaps.

Students in juvenile court and county community schools face unique barriers. The transitional status that sometimes characterizes the time these students spend in these programs often prevents completion of the specific courses, internships, or credentialing that the CCI counts, undercounting true student potential and masking local efforts to reengage these learners. Measures that do not take into account these factors penalize LEAs serving high-need students. We ask the Board to explicitly recognize these structural barriers when considering measure design and accountability consequences.

The CCI is a powerful lever in highlighting gaps in career and college readiness. CSBA stands ready to partner with the Board and CDE to refine measures, pilot equitable approaches for juvenile and county settings, and ensure the accountability system advances opportunity for every student in California.

Item 13: Update on the Implementation of the Integrated Local, State, and Federal Accountability and Continuous Improvement System: Review of the 2025 California School Dashboard and 2024–25 Data Release, and Approval of the 2026 Accountability Workplan.

CSBA urges the Board to evaluate any proposed updates and improvements to the accountability system through the lens of a clearly defined, comprehensive state operations and support plan. Developing such a plan has long been a CSBA priority, and we are advancing specific proposals to address disconnected programs and other barriers that impede LEA's efforts to close the achievement gap. CSBA stands ready to partner with the Board and CDE to build a nation-leading state accountability system that is coherent, well-aligned and focused on supporting school districts and county offices of education need to help every student succeed.

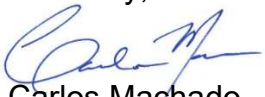
CSBA appreciates the Board's focus on the Long Term English Learner student group and its plan to consider augmenting the English Learner Progress indicators. Adding LTELs to the Dashboard increases visibility and accountability for a population that continues to face persistent challenges, as the 2025 Dashboard makes clear. Given the strong commitment of local governance teams to closing the achievement gap, CSBA encourages a careful analysis of this indicator. It is important that the LTEL indicator and others related indicators reflect the disparities across student groups and that those results meaningfully improvements within the state's system of support for differentiated assistance.

Item 16: Supporting Priority School Districts Program - Approve the Commencement of a 45-Day Public Comment Period for Proposed Amendments to *California Code of Regulations*, Title 5, Chapter 1, Subchapter 1.7, Section 14050.

CSBA has long advocated for greater state support for safe and educationally appropriate facilities, which are fundamentally necessary for effective school operations. Research has shown that many small and rural school districts face a significant burden in this area, including a lack of resources that would otherwise allow those districts to avail themselves of existing state programs, such as the School Facilities Program. The proposed SPSD program is intended to support priority school districts facing challenges with aging infrastructure, increased maintenance costs, limited administrative capacity, and difficulty navigating the state's programs. While not a panacea, this is a good first step towards providing more support to these districts and should be supported.

Contact Information
I can be reached at cmachado@csba.org or (916) 669-2552 to discuss these items further and to aid in sharing this information with CSBA members.

Sincerely,



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