Date of Hearing: July 16, 2025

ASSEMBLY COMMITTEE ON EDUCATION Al Muratsuchi, Chair SB 374 (Archuleta) – As Amended March 20, 2025

SENATE VOTE: 37-0

SUBJECT: Local educational agencies: annual reporting requirements: IDEA Addendum

SUMMARY: Extends by one year the date by which the California Department of Education (CDE) is required to provide a report to the Legislature on the number and types of reports that local educational agencies (LEAs) are required to annually submit, and eliminates the requirement that the State Board of Education (SBE) adopt an Individuals with Disabilities Education Act (IDEA) Addendum to the Local Control and Accountability Plan (LCAP) relating to improvements in services for students with disabilities. Specifically, **this bill**:

- 1) Extends by one year, from January 1, 2026, to January 1, 2027, the date by which the CDE is required to provide a report to the Superintendent of Public Instruction (SPI), the Governor, and the Legislature on the number and types of reports that LEAs are required to annually submit.
- 2) Eliminates the requirement that, by January 31, 2027, the SBE adopt an IDEA Addendum relating to improvements in services for individuals with exceptional needs.

EXISTING LAW:

- 1) Requires CDE to provide a report, by March 1, 2025, to the SPI, the Governor, and the Legislature on the number and types of reports that LEAs are required to annually submit, and requires the report to include all of the following:
 - a) Information on each type of report, including if the report is required by a particular program;
 - b) The purpose of each report; and
 - c) Recommendations for both of the following:
 - i) Which reports can be consolidated or eliminated to reduce the total number of reports LEAs are required to annually complete; and
 - ii) Which reports can be truncated to shorten any reports LEAs are required to annually complete. (Education Code (EC) 33318.2)
- 2) Requires the CDE, in determining recommendations, to seek voluntary input from a diverse array of LEAs that vary in size, type, geographic location, and student and staff demographics. (EC 33318.2)
- 3) Encourages the Assembly and Senate Education Committees, the Assembly Committee on Budget, the Senate Committee on Budget and Fiscal Review, and any other relevant

subcommittees to hold a hearing, within 30 days of receiving a report from CDE, to allow for the SPI to present the report. (EC 33318.2)

- 4) States legislative intent that the information collected will help alleviate future burdens and costs on LEAs. (EC 33318.2)
- 5) Sunsets this reporting requirement on January 1, 2026. (EC 33318.2)
- 6) Requires the governing board of each school district to adopt an LCAP using a template adopted by the SBE, and requires adopted LCAPs to include, for the school district and each school within the school district, all of the information specified in the template adopted by the SBE. (EC 52060)
- 7) Requires the SBE to adopt a template for a LCAP and an annual update to the LCAP, and requires the template to include specified information. (EC 52064)
- 8) Requires the SBE to adopt, by January 31, 2027, an IDEA Addendum relating to improvements in services for students with disabilities, and requires CDE to develop a process to design the template for the IDEA Addendum that, at minimum, does all of the following:
 - a) Provides opportunities for input from educational partners;
 - b) Results in a template that meets the oversight and monitoring requirements of CDE and SBE under the IDEA; and
 - c) Facilitates specified requirements, including facilitating the ability to identify areas of the IDEA Addendum that are in alignment with the LCAP. (EC 52064.3)
- 9) Requires LEAs, upon identification by CDE that an improvement plan is necessary pursuant to federal regulations, to complete the IDEA Addendum. (EC 52064.3)
- 10) Requires each LEA that is required to develop an IDEA Addendum to do both of the following by July 1, 2027:
 - a) Develop the IDEA Addendum in conjunction with, and attached to, the LCAP and annual update to the LCAP, be adopted by the governing board of a school district, a county board of education, or by the governing body of a charter school, and be updated on an annual basis thereafter; and
 - b) Submit the IDEA Addendum to CDE within 15 days of adoption by the governing board of a school district, county board of education, or governing body of a charter school. (EC 52064.3)
- 11) Requires that, beginning with LCAPs for the 2024–25 school year, LEAs include specific actions to address all instances where a school or student group within an LEA, or a student group within a school, receives the lowest performance level on one or more state indicators on the California School Dashboard (Dashboard). (EC 52064)

FISCAL EFFECT: According to the Senate Appropriations Committee, pursuant to Senate Rule 28.8, negligible state costs.

COMMENTS:

Need for the bill. According to the author, "As California struggles to fill the funding gap potential federal funding cuts could create, it is vital for California to ensure taxpayer dollars are used responsibly. School districts throughout the state are required to produce 170 reports annually, nearly equivalent to the statutorily required 180 instructional days in the school year. The sheer number of reports can be suffocating for school districts and detracts from their ability to meet the educational needs of students. In 2024, I introduced and the governor signed SB 1315, which directed the California Department of Education (CDE) to provide a report on the number and types of reports that local education agencies (LEAs) are required to submit annually in order to provide recommendations for which reports could be consolidated, eliminated, or truncated.

SB 1315 would have alleviated the administrative costs and burdens placed on school districts – especially important at a time when they are working hard to make ends meet. While the CDE continues to work on finalizing its work on providing actionable recommendations to condense or reduce the amount of reports LEAs are faced with, SB 374 would extend the sunset date of the provisions of SB 1315 by one year to 2027. It would also delete the statutory provision for the IDEA addendum, enacted to ensure that annual reporting data was provided regarding special education students to meet the oversight monitoring requirements, which is now largely duplicative as the same information is required through annual LCAP reporting."

SB 1315 report on reports. Existing law requires the CDE to provide a report, by March 1, 2025, to the SPI, the Governor, and the Legislature on the number and types of reports that LEAs are required to annually submit, and make recommendations on eliminating, consolidating, and shortening LEA reporting requirements. This report was completed in March, 2025.

LEA stakeholders have expressed concern with the quality of this report and its recommendations. Specifically, they have expressed concern that report does not contain recommendations for consolidating or eliminating reports that LEAs are required to complete. Instead, the report lays out a plan to complete the work necessary to make the recommendations for consolidating reports (as shown below).

This bill extends the sunset date on provisions requiring CDE to complete this report, but does not require CDE to revise or redo the report. According to the author, the CDE is continuing to finalize its work on providing actionable recommendations, and extending the sunset would allow the conversations between CDE and stakeholders to continue.

The CDE report submitted in March, 2025 stated, "While the CDE recognizes the important role data plays in measuring outcomes, fostering transparency, and supporting accountability; the CDE further recognizes the frustration educators and LEA administrators experience when data collection efforts impact their ability to serve students, especially if those data collections fail to render information that clearly connects to improved student outcomes." The report also noted that in 2024 the CDE adopted a Data Strategy to reorganize staff and resources in support of department-wide data governance, and is "striving to—at minimum—align reporting deadlines

and data collection methods to minimize impacts on educators and LEA staff, especially during the busiest times of the school year."

It further stated that this report is "intended to affirm and spotlight the frustrations educators are facing as they seek to meaningfully encourage positive student outcomes while wading through bureaucratic requirements that do little to provide actionable insights that can be applied in the classroom."



The report did not make recommendations on

eliminating, consolidating, and shortening LEA reporting requirements, as required by SB 1315. It did make the following recommendations for the CDE:

- Verify that required reports align with statutory mandates;
- Search for redundancies amongst required reports and collaborate cross-divisionally to eliminate multiple requests for the same data;
- Identify similarities amongst required reports and collaborate cross-divisionally to consolidate reports where possible;
- Examine conditions that prompted the original reporting requirement, determine if current conditions still support the reporting requirement, and make plans to phase out reporting requirements that have become obsolete;
- In instances where the CDE already has data in its possession, fulfill reporting requirements without LEA involvement;
- Develop and maintain resources to facilitate transparent, clear information on reporting requirements;
- Establish an annual schedule for reviewing LEA reporting requirements to ensure alignment with statutory mandates and best practices for student success; and
- Determine requirements and funding necessary for connecting and updating systems to streamline and minimize LEA reporting requirements.

The report made the following recommendations for external stakeholders:

- Review what is being required by current mandates under their purview, to ensure common understanding of:
 - Those being served by reporting mandates;

- Inputs, outputs, purpose, and goals of mandates;
- Time and resources needed to comply with mandates; and
- Implications of mandates including:
 - Legal considerations;
 - Priority shifts needed to ensure compliance; and
 - Risks and benefits of compliance.
- Consolidate redundant/similar data collections where feasible;
- Phase out data reporting requirements that have become obsolete; and
- Evaluate the legal implications, resource requirements, and risks/benefits of reporting requirements, consolidating redundant reports, and phasing out obsolete reporting requirements.

The report also made the following Legislative recommendations:

- Collaborate with education constituents to champion legislation requiring ongoing funding to update, connect, and maintain outdated data systems;
- Provide ongoing funding for improvement and maintenance of California's educational data systems;
- Provide ongoing funding and requirements for data literacy training for decision-makers, educators, families, and students; and
- Require inclusion of the CDE, education advocacy groups, and LEA representatives prior to modifying or augmenting state-level LEA reporting mandates.

The Plandemic: Reporting requirements increase as new programs and initiatives proliferate during the COVID-19 pandemic. The Local Control Funding Formula (LCFF), enacted in 2013, eliminated most categorical programs and their associated applications, plans, reports, data submissions, and compliance monitoring.

Since then, and particularly during the COVID-19 pandemic, a surge in state and federal funding resulted in the proliferation of new programs and initiatives. These programs were accompanied by applications, plans, data submissions, and reports. The state's multiple measures accountability system has also required more reporting by LEAs to the state.

As was the case prior to LCFF, LEAs report that many reports are duplicative, cumbersome, and often require LEAs to report the same data (which the state already has) over and over. Adding to the frustration some LEA staff feel is the suspicion that not all of the information reported will be reviewed and used by the entities requiring it.

State reporting requirements: balancing accountability and evaluation with opportunity costs. State reporting requirements serve important purposes, among them the evaluation of the efficacy of policy initiatives and the safeguarding of public funds.

But according to the California School Boards Association (CSBA), the cumulative impact of mandated state and federal reports, data submissions, and planning documents draws resources away from critical tasks and responsibilities of LEA staff, especially in California's smaller districts and COEs. In a 2024 report, *Drowning in Documentation*, CSBA notes the following effects:

- <u>High price in time, human capital, cost and opportunity cost</u>: Administrators' planning and reporting efforts are so extensive that they cut into time available for instructional leadership, school improvement, school climate and other critical functions.
- <u>Ever-growing burden</u>: While new programs and mandates add to the long list of reporting requirements, state and federal government rarely phase out requirements, even when they become duplicative or are no longer actively reviewed by their respective agencies.
- <u>Too much data to digest</u>: Some districts, particularly smaller ones, lack the time and capacity to use the required data for their own purposes. State agencies often lack the staff capacity to analyze required plans, reports and data submissions or provide constructive feedback and technical assistance to LEAs.
- <u>Disproportionate burden for smaller districts</u>: Large districts might have dozens of staff to meet these requirements. Small to medium districts might have anywhere from a handful to more than a dozen staff available to complete reports, plans, and data submissions. Very small districts might rely on the superintendent, principal or superintendent/principal to meet these requirements, taking time away from their other administrative and educational leadership responsibilities. Alternatively, very small districts may have to hire outside consultants to do this work, consuming valuable resources that could be spent on student support and instruction. A significant amount of public funding is only available through discretionary grants that require additional time for applying, planning, reporting. Smaller and less-resourced districts often cannot take on this additional workload, creating opportunity gaps for students, staff and schools.

The CDE, in its 2025 report, acknowledged the balance between the benefits of accountability and transparency to improve student outcomes, and the dangers of undermining capacity to improve by overburdening LEA staff. They noted the following "truths" in their report:

- Valid, reliable, timely educational data can be a powerful tool to improve student outcomes;
- Current LEA reporting mandates are vast, time consuming, burdensome, and do not clearly connect to actionable insights;
- At the state level, much can be done to improve and streamline data reporting processes, especially if efforts are coordinated and supported by funding and legislation;
- More work is needed to fully understand reports LEAs are submitting, which entities are receiving the data, and how data are being used once submitted;
- The CDE can leverage accomplishments at the state level to advocate for improvements beyond California; and
- The completion of this report is just the beginning of a broader conversation about LEA reporting requirements.

Interestingly, the CDE report also found that "some of the plans discussed during stakeholder focus groups (e.g., tech plans) have not been required at the state or federal level for some time,"

suggesting a disconnect in communication between the state and LEAs regarding sunsetted or eliminated requirements.

What kinds of information do LEAs send to the state? According to the author, LEAs produce approximately 170 reports per year – nearly one for each day of the school year. LEAs submit numerous sets of data through these and other systems to meet state and federal requirements:

- California Basic Educational Data System
- California Longitudinal Student Achievement Data
- Standardized Account Code Structure System
- Principal Apportionment Data Collection System
- Child Nutrition Information Payment System
- The Consolidated Application and Reporting System
- Federal Program Monitoring Reviews
- Fiscal and Attendance Data.
- Every Student Succeeds Act (ESSA) Per-Student Expenditures System
- Civil Rights Data Collection
- Special Education

Some of the required plans, applications, and reports LEAs submit to the fall into the following categories:

- Accountability
- Safety and Transportation
- State Block Grants and Special Funds
- Special Education
- Pandemic Recovery programs
- Discretionary Grants

Moving toward a more comprehensive approach. This bill proposes to push back the date by which CDE is required to produce a report and recommendations on reports that could be consolidated. *The Committee may wish to consider* that more could be done to improve reporting processes, starting with the Legislature and the Governor. They may wish to consider the following questions when deciding whether, and how, to establish a new reporting requirement:

- Purpose: Why is this information being requested, and how will it be used?
- Audience: Who is going to use this information?
- Value: Of how much value is this information, and what is the opportunity cost?
- Feasibility: Is it possible to get the desired information, even from small LEAs?
- Duplication: Is this information already reported to the state in some other form?
- Duration: How long should this requirement be in effect?

Some elements of a better system could include:

• Guidelines and a process for establishing new reporting requirements, including consideration of the questions above;

- Technological solutions, such as auto-filled template reporting forms;
- Accommodations for small LEAs to reduce the disproportionate burden placed on them;
- Risk-based reporting, similar to the way in which audits are sometimes conducted;
- Auto-repeal of reports, similar to Government Code 10231.5 for state reports; and
- Annual pruning of unnecessary requirements, through the annual omnibus Committee bill.

IDEA Addendum no longer necessary given changes to LCAP and Dashboard. This bill eliminates the requirement that the SBE adopt an IDEA Addendum relating to improvements in services for students with disabilities. According to the author, this requirement is no longer necessary given recent changes to the LCAP and Dashboard.

The requirement for an addendum to LEAs' LCAPs that is specific to students receiving special education (the IDEA Addendum) was proposed by the Governor in the 2022-23 budget to "support inclusive planning and promote cohesion by linking special education and general education planning, so parents of students with disabilities have a defined role in the Local Control and Accountability Plan development process." The IDEA Addendum requirement was enacted in AB 181 (Committee on Budget), Chapter 52, Statutes of 2022.

For some time, concerns have been raised about the separate and overlapping accountability systems for special education required by state and federal law. This concern was articulated in the *California Special Education Governance and Accountability (SEGA) Study*, published by WestEd in 2021, pursuant to SB 75 (Committee on Budget and Fiscal Review), Chapter 6, Statutes of 2020, which found that "although students with an IEP are included in and addressed through the general education governance and accountability structures — for example, as a specific student group on the Dashboard and for eligibility for differentiated assistance — California also has both separate and overlapping special education governance and accountability structures."

In light of longstanding litigation over CDE's special education compliance monitoring, the "Emma C." case, the IDEA Addendum was designed as an attachment to the LCAP to ensure that annual reporting data was provided to meet oversight monitoring requirements. The court has since lifted the consent decree in that case.

Subsequent legislation, SB 114 (Committee on Budget and Fiscal Review), Chapter 48, Statutes of 2023, made changes to the LCAP and California School Dashboard to require that all "red" subgroups, including students with disabilities, be addressed in the LCAP. This requirement improves alignment between the two accountability systems for special education.

That legislation also requires LEAs that have red Dashboard indicators for 1) a school within the LEA, 2) a student group within the LEA, and/or 3) a student group within any school within the LEA, include one or more specific actions within the LCAP. The specific actions must be directed towards the identified student groups and/or schools and must address the identified state indicators for which the student group or school received the lowest performance level on the 2023 Dashboard. Each student group and/or school that receives the lowest performance level on the 2023 Dashboard must be addressed by one or more actions. *The Committee may wish to consider* that given these changes to the LCAP and Dashboard, the IDEA Addendum is no longer necessary.

Arguments in support. The California School Boards Association writes, "Last year, the Governor signed into law SB 1315 (Archuleta/Chapter 468) which required the California Department of Education to compile listing of reports and plans that local education annual file along with recommendations on those plans and reports that could be condensed, truncated and/or eliminated in order to reduce the overwhelming administrative burden and associated costs that are currently being placed on LEAs.

SB 374 extends the sunset date of the reporting provisions to ensure that CDE has enough time to complete the necessary reports as required by SB 1315. Further, this bill deletes the IDEA addendum report that was originally placed in statute to ensure that school districts reported data on special education students.

School districts are now required to include data on all student subgroups that are in red on the state's Dashboard report, which includes special education students. This makes the IDEA addendum redundant. This legislation will also reduce local cost pressures for school districts and county offices by deleting at least one of the many reports they are mandated to complete."

Related legislation. SB 1315 (Archuleta), Chapter 468, Statutes of 2024, requires the California Department of Education (CDE) to conduct a report on the number and types of reports that local educational agencies (LEAs) are required to submit on an annual basis.

SB 114 (Committee on Budget and Fiscal Review), Chapter 48, Statutes of 2023, requires that LEAs that have red Dashboard indicators for 1) a school within the LEA, 2) a student group within the LEA, and/or 3) a student group within any school within the LEA must include one or more specific actions within the LCAP.

AB 181 (Committee on Budget), Chapter 52, Statutes of 2022, requires the SBE to adopt, by January 31, 2027, an IDEA Addendum relating to improvements in services for students with disabilities, and requires CDE to develop a process to design the template for the IDEA Addendum.

REGISTERED SUPPORT / OPPOSITION:

Support

Association of California School Administrators California Association of School Business Officials California County Superintendents California School Boards Association California Federation of Teachers

Opposition

None on file

Analysis Prepared by: Tanya Lieberman / ED. / (916) 319-2087