

## FIRST SUPPLEMENT TO MEMORANDUM 2025-45

### Priorities and Proposed Topics for Resolution of Authority (Public Comment)

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This supplement presents a public comment received by the Commission related to Memorandum [2025-45](#).<sup>1</sup> The public comment is attached as an Exhibit to this supplement.

| <i><u>Exhibit</u></i>                                | <i><u>Exhibit page</u></i> |
|--|----------------------------|
| California School Boards Association (12/1/25) ..... | 1                          |

As with prior memoranda, a brief description of the commentator is below:

According to their website, the [California School Boards Association](#) (CSBA):

... is the nonprofit education association representing the elected officials who govern public school districts and county offices of education. With a membership of nearly 1,000 educational agencies statewide, CSBA brings together school governing boards, and administrators from districts and county offices of education to advocate for effective policies that advance the education and well-being of the state's more than 6 million school-age children. A membership-driven association, CSBA provides policy resources and training to members, and represents the statewide interests of public education through legal, political legislative, community and media advocacy.

### PUBLIC COMMENT

CSBA writes “to support the California Association of School Business Official’s (CASBO’s) request that the Commission study the numerous reporting requirements required of Local Educational Agencies (LEAs).” Similar to CASBO, CSBA states:

The adoption of the Local Control Funding Formula in 2013 was intended to consolidate many categorical programs and the associated compliance requirements. However, a surge of funding in the years since, including billions tied to the COVID-19 pandemic, has instead resulted in a Byzantine reporting system that more often than not interferes with LEA’s capacity to focus on their core responsibilities, often with seemingly no benefit to the state, LEAs, or the

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<sup>1</sup> Any California Law Revision Commission document referred to in this memorandum can be obtained from the Commission. Recent materials can be downloaded from the Commission’s website ([www.clrc.ca.gov](http://www.clrc.ca.gov)). Other materials can be obtained by contacting the Commission’s staff, through the website or otherwise. The Commission welcomes written comments at any time during its study process.

Any comments received will be a part of the public record and may be considered at a public meeting. However, comments that are received less than five business days prior to a Commission meeting may be presented without staff analysis.

community LEAs serve.

At the same time, CSBA emphasizes the need for transparency and accountability.

CSBA referred to its fact sheet titled “[Drowning in Documentation](#)” that outlines the various state and federal reports and data that LEAs must complete. CSBA states that the fact sheet demonstrates “that the sheer volume and ever-growing list of required reports is overwhelming school districts and county offices of education.”

Respectfully submitted,

Sharon Reilly  
Executive Director



California School Boards Association

December 2, 2025

The Honorable Richard Simpson, Chair  
and Honorable Commissioners  
California Law Revision Commission  
c/o Legislative Counsel Bureau  
925 L Street, Suite 275  
Sacramento, CA 95814

**Re: Proposed new study**

Dear Chair Simpson and Honorable Commissioners:

On behalf of the California School Boards Association (CSBA), which represents nearly 1,000 school district and county boards of education statewide, I am writing to support the California Association of School Business Official's (CASBO's) request that the Commission study the numerous reporting requirements required of Local Educational Agencies (LEAs).

The adoption of the Local Control Funding Formula in 2013 was intended to consolidate many categorical programs and the associated compliance requirements. However, a surge of funding in the years since, including billions tied to the COVID-19 pandemic, has instead resulted in a Byzantine reporting system that more often than not interferes with LEA's capacity to focus on their core responsibilities, often with seemingly no benefit to the state, LEAs, or the community LEAs serve.

CSBA holds that accountability and transparency are undeniably vital to our public education system. However, we've found that the sheer number of required reports reduces transparency by obscuring potentially useful data under a mountain of redundant and difficult-to-decipher reports. In addition, the reporting requirements can detract from the actual work of supporting students by limiting the time and resources available to spend on meeting local needs, ultimately undermining staff's ability to provide safe, healthy, and productive environments for students.

CSBA's Research and Education Policy Development Department investigated the issue and produced the May 2024 fact sheet, "Drowning in Documentation," which highlighted the growing number of state and federal reports, data submissions, and plans that LEAs must complete. "Drowning in Documentation"

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demonstrated that the sheer volume and ever-growing list of required reports is overwhelming school districts and county offices of education. Feedback from the field confirms that educators and administrators are increasingly torn between managing this paperwork and focusing on their primary obligations to students, staff, and communities. For smaller districts, this issue is especially acute, pulling their limited number of staff away from serving students.

CSBA has supported numerous efforts to address this problem, including co-sponsoring Senate Bill 1315 (Archuleta) along with CASBO, sponsoring Senate Bill 374 (Archuleta), and supporting research that seeks to quantify the time spent on compliance activities and the associated cost of that time. A study by the Commission would provide a neutral analysis of an increasingly complex issue, providing both policy makers and educational partners with the crucial information needed to consider streamlining reporting requirements, including by identifying areas to eliminate, truncate, or consolidate obsolete or duplicative requirements, so that LEAs can better focus on supporting their students.

We hope that you will consider this proposed study. If you have questions regarding our position, please feel free to contact me at [dmerwin@csba.org](mailto:dmerwin@csba.org) or (916) 669-3268.

Sincerely,



Dan Merwin  
Legislative Advocate  
Office of Governmental Relations