



February 8, 2021

The Honorable Gavin Newsom  
Governor, State of California  
State Capitol, First Floor  
Sacramento, CA 95814

The Hon. Toni Atkins  
Senate President pro Tempore  
State California, Room 205  
Sacramento, CA 95814

The Hon. Anthony Rendon  
Speaker of the Assembly  
State Capitol, Room 219  
Sacramento, CA 95814

***Re: Reopening Schools for In-Person Instruction and Accelerating Learning***

Dear Governor Newsom, Senate pro Tem Atkins and Assembly Speaker Rendon:

The [California Association of Suburban School Districts](#) (CALSSD) appreciates the opportunity to provide comments to advance reopening of schools for in-person instruction and to support student learning acceleration. CALSSD represents districts across the state with a diverse student population of more than half a million TK-12 students. Since the beginning of the pandemic and over the course of the last eleven months, suburban schools have worked ceaselessly on COVID-19 response and recovery to provide instruction and learning, nutrition services and child care that is vital to students, families, staff, and our communities. We urge you to act soon to allocate funds to districts to support ongoing opening plans and so that educators, students, and families can plan for the remainder of this school year, summer 2021 and the 2021-22 school year.

The impact of the pandemic and the shift to remote learning has affected communities across the state. Student learning, social-emotional and mental well-being have been extremely impacted. This is especially the case in those communities hit disproportionately by COVID-19 -- communities of color, and low-income communities. This makes the reopening conversation more time sensitive than ever before and why statewide guidance, standards and action are critical.

Many suburban school districts have been providing small group support, some were able to open schools under the prior elementary waiver process and/or because their county moved into a less-severe Tier. The recent slowing in COVID-19 rates provides more opportunities for in-person programs to open soon. School system leaders are eager to open for in-person instruction and to do so with safety and mitigation procedures in place. As more schools plan to open and expand in-person instruction and to think about the coming summer and fall, we provide the following recommendations:

**Clear standards and requirements for in-person instruction based on evidence and experience.**

- Provide clear, consistent guidelines, based on evidence and the experience of those schools that have been providing in-person instruction for safety mitigation and when schools reopen.
- The January 14, 2021 guidance provides that elementary schools can reopen when COVID-19 adjusted case rates are 25 per 100,000 with comprehensive safety and mitigation practices and equipment in place. Schools in California that have been open for in-person instruction without causing outbreaks demonstrate soundness of this approach.

- Establish a statewide standard by which schools will reopen so that it does not have to be determined in each school district. The current system creates a patchwork of conditions under which each district must assess public health conditions and craft individual reopening plans. With more than 1000 school districts in the state, this approach lacks consistency and equity to our students.
- Clarify that physical distancing for students may be less than 6 feet, as was provided under earlier guidance. Again, schools that have been open under the earlier state guidance which used “6 feet as practicable” for student distance, have shown it can work. We agree that adults should continue at the 6 feet physical distance.

### **Expedite Access but Don't Predicate Reopening on Vaccines**

- We appreciate leadership of the state in advocating for additional supplies and attempts to improve vaccine distribution and administration systems, but vaccinations should not be a requirement for school opening.
- The changes in vaccine priorities and lack of transparent information on how and when those working in education will be vaccinated has created confusion. While some health agencies have started to vaccinate educators, it has been left to local agencies to set priorities and lack of consistent information has caused frustration. School system leaders must be able to communicate with confidence to their communities the plans and access for vaccines.
- We support access for educators and urge the state to do all it can to increase supply, but it should not be a condition for opening.

### **COVID-19 Testing Requirements Based on Science and in Conjunction with Local Health Agencies**

- The testing frequencies outlined in the latest guidance from CDPH, would require weekly on-site testing of staff and students, much greater frequency, and numbers than in earlier guidance. The logistics -- demands on space, facilities, staff, and funds are beyond the proposed amount of funding in the Governor's proposal. Many districts would not have capacity to sustain this high frequency.
- We urge the state to revise these requirements.

### **Early Action on Expanded and Accelerated Learning Funds**

School system leaders are planning the remainder of this school year, for summer 2021 and the next school year at the same time they are working on reopening. We urge state leaders to act on the allocation of funds to local educational agencies so that expanded academic, social emotional and other support services and programs can be crafted.

- Funding should be allocated to all districts based on Local Control Funding Formula and consideration should be given to increasing the LCFF base funding levels given the need for expenditures on items where the impacts are on all students and staff and are unrelated to supplemental and concentration grant factors.

- Per the recommendation by the Legislative Analyst Office, schools should have multiple years to expend these funds.
- Schools are looking at a variety of approaches, engaging staff, students, and families in these efforts. Some of the key features being considered:
  - ✓ Small cohorts and ratios of teacher to students; co-teaching models
  - ✓ Incorporate student voices in planning programs and services
  - ✓ Rethink traditional summer school: Focus on social-emotional learning and academic learning; offer non-traditional experiences such as outdoor camps
  - ✓ Professional learning opportunities for teachers
  - ✓ Stipends for teachers and staff

Thank you again for your leadership on these critically important issues. If we can be of further assistance, please contact us via e-mail at [andrea@ballfrostgroup.com](mailto:andrea@ballfrostgroup.com) and [jeff@ballfrostgroup.com](mailto:jeff@ballfrostgroup.com).

Sincerely,



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California Association of Suburban School Districts



Jeffrey Frost  
Legislative Advocate  
California Association of Suburban School Districts

Copy: Hon. Tony Thurmond, State Superintendent of Public Instruction  
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Hon. Jim Nielsen, Vice Chair Senate Budget Committee  
Hon. Connie Leyva, Chair Senate Education Committee  
Hon. Scott Wilk, Vice Chair Senate Education Committee  
Hon. John Laird, Chair, Senate Budget Subcommittee #1  
Hon. Phil Ting, Chair Assembly Budget Committee  
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