

OFFICE OF PUBLIC SCHOOL CONSTRUCTION
STAKEHOLDER MEETING
April 10, 2025

IMPLEMENTATION OF PROPOSITION 2 FOR THE SCHOOL FACILITY PROGRAM

PURPOSE

The purpose of this meeting is to continue discussion with stakeholders on the implementation of the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2) and to discuss and collect feedback on proposed amendments to the School Facility Program (SFP) Regulations for the following topics:

- Interim Housing and Natural Disaster Assistance (Attachment A6)
- Five-Year Master Plan (Attachment A7)

BACKGROUND

Proposition 2

Proposition 2 was approved by a majority of California's voters on November 5, 2024. To implement its provisions, existing SFP Regulations must be updated to align with the new statutory provisions.

OPSC is requesting stakeholder feedback regarding these changes. Both topics listed within the Purpose section of this report are broken out into individual attachments for stakeholder reference.

AUTHORITY

See Attachments A6a, A7a.

SUMMARY AND NEXT STEPS

Attached are two topics related to Interim Housing and Natural Disaster Assistance and the Five-Year Master Plan. Stakeholder feedback for these topics received from the February 13, 2025 meeting may be found on Attachment B.

Staff will review any feedback obtained in today's meeting and anything received through close of business on Friday, April 25, 2025 and will address those suggestions in the next public meeting on the corresponding topic.

To submit written feedback after today's meeting, please email your suggestions to the OPSC Communications Team at OPSCCommunications@dgs.ca.gov.

ATTACHMENT A6

OFFICE OF PUBLIC SCHOOL CONSTRUCTION STAKEHOLDER MEETING April 10, 2025

PROPOSED REGULATORY AMENDMENTS FOR SCHOOL FACILITY PROGRAM INTERIM HOUSING AND NATURAL DISASTER ASSISTANCE

PURPOSE

To continue to discuss and receive stakeholder input regarding proposed regulatory amendments to the School Facility Program (SFP) resulting from provisions of the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2), which was approved by a majority of California's voters on November 5, 2024.

AUTHORITY

See Attachment A6a.

DESCRIPTION

This report is a continuation of the discussion of interim housing and natural disaster assistance pursuant to Education Code (EC) Section 17075.20, which was presented to stakeholders on February 13, 2025. Additionally, this report introduces proposed regulatory amendments building upon the information presented to stakeholders on February 13, 2025. Office of Public School Construction (OPSC) staff received written comments from one district and one district consultant (see Attachment B) following that meeting. This report addresses those comments and proposes further changes with the goal of ensuring clear program requirements for applicants and OPSC as the program administrator.

Attachment A6b contains proposed SFP Regulation additions and amendments for discussion.

BACKGROUND

Stakeholder Feedback

On February 13, 2025, OPSC presented concepts based on the addition of EC Section 17075.20. This addition provides authority for the State Allocation Board (Board) to fund interim housing following a natural disaster for which the Governor has declared a state of emergency. This section authorizes the Board to provide "any other assistance" to a school district or county office of education (COE) determined by the Board to be impacted by a natural disaster described in EC Section 17075.20(a).

STAFF ANALYSIS/DISCUSSION

OPSC presented an overview of each subdivision (a through e) of this section and provided proposals for concepts and potential procedures related to interim housing and natural disaster assistance based upon interpretation of statute.

For purposes of this discussion, the concepts of the new sliding scale matching share and existing Financial Hardship criteria are applicable to this program.

Summary of Stakeholder Feedback

Staff would like to thank stakeholders who were able to view, attend, or participate in this meeting and also those who provided valuable feedback either at the meeting or through written correspondence to OPSC. Below is a summary of stakeholder feedback received as a result of the February 13, 2025 meeting.

Stakeholder Feedback	OPSC Response
<p>1. It would be helpful if there could be a discussion about the potential for districts to purchase the portables that were leased and to apply for those portables through New Construction eligibility and subsequent funding. Although the portables would be occupied because they were interim housing, when they change to being purchased, it would be helpful for the district to participate through the SFP program to purchase those portables.</p> <p>Additionally, expansion on the purchase of portable classrooms' impact on the New Construction baseline eligibility would be helpful to address any concerns about a "double hit" and what adjustments will look like.</p>	<p>1. OPSC acknowledges that the ability to purchase the leased portables through New Construction eligibility could be beneficial to districts; however, there are two concepts which appear to prevent districts from being able to use New Construction eligibility to fund these classrooms as additional capacity.</p> <p>First, in accordance with SFP Regulation 1859.70(a), "The Board shall only provide New Construction funding if the Approved Application was received by the OPSC prior to the date of Occupancy for any classrooms included in the construction contract. After the date of Occupancy of any classroom in the construction contract, a School District will be ineligible to seek New Construction funding, and the classrooms will be reduced from the baseline eligibility pursuant to Section 1859.51(i) if not previously reduced.</p> <p>Second, there is a provision in the new statute that allows for the lease or purchase of interim housing (EC Section 17075.20[a]), and a subsequent subdivision (EC Section</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>1. (cont.) 17075.20[d]) that outlines that portable classrooms purchased pursuant to subdivision (a) shall be included in the determination of eligibility for new construction funding, pursuant to EC Section 17071.75. Therefore, the New Construction eligibility baseline would be adjusted by the respective grade level of the portable at the time of <i>purchase</i> or at the time the leased portables are beyond the five years to provide interim housing during a modernization or new construction project, or at the time the leased portables have exceeded the three-year extension for each qualifying project, pursuant to SFP Regulation Section 1859.51(i)(5). If the portable classrooms provided are pursuant to the latter two scenarios, and remain on site, the New Construction eligibility shall be adjusted just as any other locally funded facilities placed on site would be to address the added capacity.</p> <p>To address concerns regarding a “double hit” for capacity, if the purchased portables are used as part of the reconstruction of the school, then they are not being purchased for purposes of interim housing and are thus ineligible for funding. Interim housing is intended to be temporary capacity, whereupon it is assumed that once the destroyed or severely damaged classroom(s) are reconstructed or rehabilitated back to original capacity, the interim housing will no longer be needed.</p> <p>School districts with New Construction eligibility have the option to submit an SFP New Construction application in</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>1. (cont.) lieu of an application for interim housing. If the school district has damage to classrooms that may be rehabilitated or reconstructed back to use, then the purchased portable classrooms serve as additional capacity beyond what is captured on the New Construction baseline eligibility if they remain on site after the buildings have been rehabilitated. Upon removal from classroom use after completion of the reconstruction/rehabilitation project, the eligibility will be returned to the school district's baseline eligibility.</p> <p>As these classrooms are intended to be temporary housing for students, OPSC is proposing a new adjustment type that is specific to adjustments for interim housing provided under the proposed SFP Regulation Section 1859.84 to differentiate between typical adjustments pursuant to SFP Regulation Section 1859.51(i), which often accounts for added capacity with hybrid New Construction and Modernization applications.</p> <p>OPSC proposes that districts using interim housing annually report to OPSC (from the date the facilities are placed on site until they are removed) to indicate whether the facilities have been removed and/or replaced, if they remain on the property, or if they have been moved to another district site. Then, OPSC will make necessary "reversal" adjustments to the school district's New Construction baseline if the portable facilities have been removed from the district. In addition, OPSC will perform outreach to school districts every year from the date the portable classroom(s) are placed on-site.</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>1. (cont.) Therefore, upon the purchase of portable classrooms, the school district's New Construction eligibility baseline will be adjusted for this additional capacity.</p>
<p>2. Is it possible to create a standard classroom-based emergency interim housing grant, similar to a design grant or a preliminary grant, that could be adjusted for a construction or "final" apportionment after additional information is provided and other government or insurance assistance is considered?</p>	<p>2. OPSC has considered this grant and believes that creating a standard would be too limiting for funding purposes due to the unknown factors that funding may be requested for.</p> <p>In this item, we have proposed several options for the basis of calculating the grant and appreciate stakeholder feedback.</p>
<p>3. There is ambiguity in the eligibility criteria for charter schools seeking interim housing assistance. While charter schools cannot apply directly, a school district may apply on behalf of a charter school occupying district-owned facilities. However, EC Section 17075.20(a) does not explicitly exclude charter schools on non-district owned sites. Clarification is needed to determine whether a school district can apply on behalf of a charter school located on a non-district-owned site or if such schools are ineligible for assistance.</p>	<p>3. EC Section 17075.20 specifies that school districts and COEs impacted by a natural disaster for which the Governor has declared a state of emergency are eligible to request assistance from the Board.</p> <p>School districts can only apply based on impacts of a natural disaster to a district-owned site. Charter schools located on a non-district-owned site would be ineligible for assistance under EC Section 17075.20.</p>
<p>4. Waiting for reimbursement may present financial hardships. One proposed solution is for districts to submit a verified quote for the minimum amount needed and later reconcile any excess once insurance or other public assistance funds are received.</p> <p>An upfront apportionment based on verified quotes would allow districts to receive full funding at the outset. Since disasters are unplanned events, many</p>	<p>4. OPSC agrees and recognizes the need for flexibility for school districts that may require immediate assistance rather than reimbursement.</p> <p>If associated costs are higher than proposed estimates, school districts and COEs can submit an additional request with supporting documentation. Provided funding is available, the Board and OPSC can consider a grant amendment.</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p>4. (cont.) districts lack the immediate resources to cover a matching share. Providing 100 percent of the verified quote upfront ensures districts can address their needs without delay. Once insurance and public assistance funding is secured, a true-up process would reconcile actual expenses, with any excess funds returned to the State.</p>	
<p>5. Clarification is needed regarding the timing of state and local funds. If immediate access is not available, a clear timeline should be established to ensure school districts can plan accordingly.</p>	<p>5. OPSC concurs that clarification related to the timeframe of state and local funds would be beneficial. OPSC has outlined a scenario below (see page 11) to demonstrate an instance in which a school district may request this assistance.</p>

The February 13, 2025 Stakeholder Meeting was recorded, and as a result, feedback that OPSC was able to respond to at the time of the meeting that did not impact the proposed regulations may be found here: [February 13, 2025 OPSC Stakeholder Meeting #2](#)

The full text of the previous stakeholder meeting item may be found here: [February 13, 2025 OPSC Proposition 2 Stakeholder Meeting #2 - Item](#)

Considering the feedback received at and following the stakeholder meeting on February 13, 2025, OPSC developed proposed regulations to begin the implementation of these new provisions.

Summary of Proposed SFP Regulations

The full list of amendments listed below may be found within Attachment A6b.

SFP Regulation Section 1859.2 – Definitions

As indicated in the stakeholder meeting held on February 13, 2025, OPSC proposes an amendment to this section to capture that “Interim Housing” means the rental, purchase, or lease of classrooms used to house pupils temporarily displaced as a result of a natural disaster for which the Governor has declared a state of emergency, pursuant to EC Section 17075.20.

This is to ensure that the proposed new section for this assistance has a clear definition for the term “Interim Housing,” as its previous definition was limited to temporary displacement of students due to modernization projects.

STAFF ANALYSIS/DISCUSSION (cont.)

Also, OPSC proposes adding a definition for a new *Interim Housing and Natural Disaster Assistance Request* (Form SAB TBD) for school districts to request this assistance. OPSC plans to present a draft of this new form at a future stakeholder meeting and has described initial concepts in the “Form SAB TBD” section below. Proposed SFP Regulation Sections 1859.84.1 and 1859.84.2 also refer to this form.

SFP Regulation Section 1859.80 – General

OPSC proposes an addition to this section to include subdivision (d), wherein a district shall qualify for hardship assistance by demonstrating one or more of the following:

- (d) Qualification for interim housing and natural disaster assistance as provided in Sections 1859.84.1 or 1859.84.2 as a result of a natural disaster for which the Governor has declared a state of emergency.

The addition of this subdivision introduces the two concepts associated with the proposed new SFP Regulation Sections 1859.84, 1859.84.1, and 1859.84.2 under Article 9 (Hardship Assistance).

SFP Regulation Section 1859.84 — Interim Housing and Natural Disaster Assistance

This proposed new section introduces the concepts of Interim Housing and Natural Disaster Assistance, specifying that a school district or COE may apply for interim housing and natural disaster assistance as a result of a natural disaster for which the governor has declared a state of emergency.

OPSC will validate with the Governor’s Office of Emergency Services that the state of emergency is still open at the time of application submittal. The purpose of this requirement is to provide a limitation for how long a school district may be eligible to seek funding for assistance and to provide equity for school districts in immediate need as well as school districts who have submitted requests for funding.

This section also states that a natural disaster may include, but is not limited to, events such as earthquakes, wildfires, floods, landslides, storms, hurricanes, tsunamis, and other natural catastrophes.

SFP Regulation Section 1859.84.1— Interim Housing Assistance

This section is applicable to Interim Housing Assistance specifically, inclusive of provisions of EC Section 17075.20(a) through (d).

School districts will use the proposed new Form SAB TBD to request this assistance and to describe their circumstances for requesting this funding, as this assistance is intended to supplement insurance proceeds, local, state and federal government disaster assistance.

STAFF ANALYSIS/DISCUSSION (cont.)

As indicated in the prior stakeholder meeting, grants provided for the purposes of this section shall be provided as a new construction project, allocated on a 50 percent state share basis.

Notable components of this section, beyond outlining statutory requirements, is that the state of emergency must be open at the time of application submittal. Additionally, the district must submit a Form SAB TBD, including documentation with either actual costs or estimates for the lease or purchase of portable classrooms, which includes, but is not limited to, lease/purchase agreements, documentation of costs associated with placing the portable classrooms on a site, and any actual or anticipated insurance proceeds or any other local, state, or federal government disaster assistance.

SFP Regulation Section 1859.84.2 – Natural Disaster Assistance

This proposed section, separate from the interim housing assistance, is pursuant to EC Section 17075.20(e). This section states that a school district may qualify for any other natural disaster assistance if it is determined by the Board to be impacted by a natural disaster for which the Governor has declared a state of emergency.

Funding is allocated on a 50 percent state share basis, and shall supplement insurance, local, state, and federal disaster assistance.

For purposes of the Form SAB TBD as a submission tool, additional factors to be considered by the Board at submission are as follows:

- A narrative description of the background or circumstances which prompted the district's request.
- Information relevant to the request that demonstrates funding received or anticipated to be received from insurance proceeds; and local, state, and federal government disaster assistance is insufficient to rehabilitate or reconstruct school facilities that existed at the time of the natural disaster.
- A statement explaining why the Board should grant the district's request based on law, regulation, or another basis, including but not limited to:
 - Justification if the project seeks funding in lieu of an SFP Facility Hardship Program application because the project exceeds the exception for Approved Application submittal deadlines outlined in SFP Regulation Section 1859.82.1, which requires that applications requesting funding under the Facility Hardship program must be submitted to OPSC within 12 months of DSA approval for the scope of work mitigating the health and safety threat.
 - Justification if the project seeks funding for an SFP New Construction or Modernization application in lieu of a Facility Hardship Program application.
 - Enrollment immediately prior to the natural disaster, as well as current enrollment and any basis for projected future enrollment.

STAFF ANALYSIS/DISCUSSION (cont.)

SFP Regulation Section 1859.93 – Modernization Project Funding Order

This section has been amended to indicate that the funding order for Modernization applications received pursuant to Section 1859.84.2 (for “any other” natural disaster assistance pursuant to EC Section 17075.20) shall be funded second after Facility Hardship funding applications.

SFP Regulation Section 1859.93.1 – New Construction Project Funding Order

This section has been amended to indicate that the funding order for New Construction applications received pursuant to Section 1859.84.1 [for interim housing assistance pursuant to EC Section 17075.20(a)] shall be funded first, shifting Facility Hardship funding applications to second, and applications received pursuant to Sections 1859.84.2 to third.

For the full text of proposed regulatory amendments to the SFP, please reference Attachment A6b.

Interim Housing and Natural Disaster Assistance Request (Form SAB TBD)

As mentioned above, at a future stakeholder meeting, OPSC will present a new Form SAB TBD for districts to request assistance pursuant to EC Section 17075.20. The form instructions will include the following:

For purposes of requests for assistance to lease and/or purchase portable classroom(s) as a result of a natural disaster for which the Governor has declared a state of emergency, the district should provide documentation pursuant to SFP Regulation 1859.84.1 demonstrating that costs associated with interim housing have not been covered by insurance proceeds or any other local, state, or federal government disaster assistance. If the district reasonably expects to receive future insurance proceeds or any other government disaster assistance attributable to costs of interim housing, the district must provide documentation pursuant to paragraph (2) of subsection (d) of SFP Regulation Section 1859.84.1.

For purposes of requesting natural disaster assistance, the district should provide the following:

- 1. Documentation demonstrating information relevant to the request that demonstrates funding from insurance proceeds; and local, state, and federal government disaster assistance is insufficient to rehabilitate or reconstruct school facilities that existed at the time of the natural disaster.*
- 2. The appropriate application for funding and associated documentation required for submittal of an Approved Application per SFP Regulation 1859.2, as applicable to the request for natural disaster assistance.*

STAFF ANALYSIS/DISCUSSION (cont.)

Interim Housing and Natural Disaster Assistance Checklist

In order to assist school districts with guidance surrounding OPSC anticipates preparing a checklist that is comparable to the Facility Hardship Request form (linked here: [Facility Hardship Request](#)). This document would not be required to submit a request for assistance; it would serve as a tool and checklist to support school districts in what is required in a complete submittal for this assistance. Although it is not required to submit the checklist in conjunction with the Form SAB TBD, OPSC encourages school districts to use the checklist to request approval by the Board for interim housing and natural disaster assistance application(s).

New Construction Eligibility Baseline Adjustments

New Construction eligibility is calculated based on a school district's projected need to house new pupils and is adjusted for any additional capacity beyond what was captured on the *Existing School Building Capacity* Form SAB 50-02 at the time of establishment.

For clarification regarding interim housing assistance and adjustments to the New Construction eligibility baseline, portables leased for more than five years or purchased pursuant to EC Section 17075.20 function as added capacity, as indicated by SFP Regulation Section 1859.51 and subdivision (d)(2), respectively.

However, the assumption is that the portable classrooms acquired pursuant to this EC Section function as temporary housing while the school is being rebuilt or rehabilitated, and that the school would be rebuilt to pre-disaster capacity.

Therefore, related to any necessary adjustments to the New Construction baseline eligibility, OPSC is seeking stakeholder feedback regarding the concept of viewing this statutory adjustment as the following:

- 1) A "placeholder" adjustment on the New Construction eligibility baseline, wherein upon the completion of the rebuilt school, a reversal of the adjustment may take place upon demonstration of either:
 - a) The portable classroom(s) lease ends, and they are returned to the manufacturer, or
 - b) The school district sells/removes the portable classroom(s) purchased for purposes of interim housing if it was more cost effective to do so as opposed to leasing.

STAFF ANALYSIS/DISCUSSION (cont.)

OPSC requests stakeholder feedback on this concept for purposes of tracking leased and purchased portables and any ensuing statutory adjustments necessitated as a result of additional capacity from interim housing assistance.

Timeline of Assistance

OPSC recognizes the importance of accelerated processing and funding as it relates to disaster assistance. As a result, OPSC anticipates processing applications between 30-60 calendar days from the date an application is received, including applicants who request Financial Hardship funding.

Example of Interim Housing Assistance Grant

For purposes of determining a potential grant, the example below illustrates how a grant would be calculated for interim housing pursuant to EC Section 17075.20(a). In the following example, a fire significantly damaged 20 out of 22 total classrooms at an elementary school. The Governor declared a state of emergency for this fire, and as a result, the school district requests interim housing assistance for two years. The associated costs are as follows:

Total Enrollment at School	550 pupils (K-6)	
Total Number of Classrooms (CR) at School	22 (K-6)	
Number of Impacted CR at School	20 (K-6)	
Monthly Portable CR Lease Cost	\$5,000* per CR per month <i>multiplied by 20 CRs</i>	\$100,000*
The following calculations demonstrate the total grant amount:		
Total Lease Cost	<i>\$100,000* multiplied by 24 months</i>	\$2,400,000*
Site Placement Costs per CR	<i>\$10,000* multiplied by 20</i>	\$200,000*
Utilities Installation Costs (Total)	\$10,000*	\$10,000*
Site Development (Total)	\$20,000*	\$20,000*
TOTAL GRANT		\$2,630,000*

**These dollar amounts are for illustration purposes only.*

Interim housing assistance will be funded on a 50/50 State and Local Match under New Construction funding, or \$1,315,000 State match and \$1,315,000 Local match.

STAFF ANALYSIS/DISCUSSION (cont.)

However, given EC Sections 17072.30 and 17074.16 have been amended for purposes of determining the local matching share, OPSC interprets that this assistance would be subject to this new statutory requirement as well. As a result, the following example utilizing the dollar amounts above has been provided to illustrate the difference between the total state share, the local adjustment, and the local share:

Demonstration of Matching Shares

	< 6 Points	6 or 7 Points	8 Points	9 or 10 Points	> 10 Points
	50/50	51/49	52/48	53/47	55/45
State Share	\$1,315,000	\$1,315,000	\$1,315,000	\$1,315,000	\$1,315,000
Financial Hardship Share	\$ -	\$ -	\$ -	\$ -	\$ -
District Contribution	\$1,315,000	\$1,288,700	\$1,262,400	\$1,236,100	\$1,183,500
Local Funding Adjustment Grant	\$ -	\$26,300	\$52,600	\$78,900	\$131,500
Total Approved Project Cost	\$2,630,000	\$2,630,000	\$2,630,000	\$2,630,000	\$2,630,000

For additional reference regarding the new matching shares requirement, please refer to the January 30, 2025 and March 13, 2025 stakeholder meetings, which may be located here: [Proposition 2 - Assembly Bill 247](#).

“Any Other Assistance”

OPSC recognizes the importance of defining the statutory language of “any other assistance” for purposes of EC Section 17075.20(e). Upon evaluation of current SFP programmatic requirements and recent Board approvals of applications that could not be administratively funded, OPSC has outlined below circumstances for which the Board has approved funding associated with natural disaster assistance that OPSC interprets to fall under the category of “any other assistance.”

Paradise Unified – Multiple Applications Appeal

On September 22, 2021, the Board approved Paradise Unified’s appeal request for expedited apportionments outside of the Priority Funding Process and in advance of the current projects on the workload list and Applications Received Beyond Bond Authority list in addition to the use of established modernization eligibility at alternate school sites.

STAFF ANALYSIS/DISCUSSION (cont.)

Pioneer Union Elementary – Berry Creek Elementary Appeal

On April 3, 2024, Pioneer Union Elementary received approval by the Board for its appeal request regarding its SFP application for New Construction funding at Berry Creek Elementary. The Board approved the following:

- 1) Funding based on the 2019/2020 enrollment year that was in effect at the time of the North Complex West Zone Fire.
- 2) Funding based on the District's current need to house pupils displaced by the fire, rather than on the projected need to house new pupils.
- 3) An expedited Apportionment for Application Number 50/73379-00-002.
- 4) Exemption from the regulatory requirement to include any classroom(s) for which a contract was signed for the construction or acquisition of facilities in the District's gross classroom inventory.
- 5) The design funding previously approved for the project under Application Number 51/73379-00-001 offset the approval of Application Number 50/73379-00-002, as the design made from the proceeds of that approval constituted the work to be completed in Application Number 50/73379-00-002.

Pioneer Union – Walt Tyler Elementary Appeal

On February 26, 2025, Pioneer Union received approval by the Board for its appeal request requesting expedited processing and an apportionment for a New Construction project at Walt Tyler Elementary.

Accelerated Timeframes

Each of these school districts experienced a natural disaster for which the Governor had declared a state of emergency, at their respective times. The common thread between these appeal requests is the requests for "accelerated processing and funding." OPSC anticipates that one methodology of requesting "any other assistance" would be to request accelerated processing and funding for New Construction and Modernization applications.

OPSC considers nuanced requests that cannot be administratively approved, such as alternative eligibility considerations, determinations that are best suited for appeal requests submitted in parallel to the interim housing and natural disaster assistance request.

STAFF ANALYSIS/DISCUSSION (cont.)

Other Assistance to Consider

The Board may also consider providing assistance for facilities that do not fit the “classroom” definition, and as such, OPSC proposes that necessary facilities for day-to-day school operations may be considered for eligible costs under “any other assistance.” Examples of necessary facilities may include office/administrative space, an interior dining area and restrooms.

OPSC seeks stakeholder feedback on considerations for “any other assistance” in this regard.

Future Discussion

For a future meeting, OPSC anticipates discussing and opening the conversation for stakeholder feedback on the following:

- Evaluating how New Construction and Modernization eligibility will be adjusted for any net gains or losses in classrooms with interim housing as a factor.
- Examples of “any other assistance” applications.
- A new *Interim Housing and Natural Disaster Assistance Request* (Form SAB TBD).

AUTHORITY

Education Code (EC) Section 17075.20 – Hardship Application

- (a) Notwithstanding any other law, the board may provide assistance under this chapter for purposes of procuring interim housing, including, but not limited to, the leasing or acquisition of portable classrooms and any work associated with placing them on a site, to school districts and county offices of education impacted by a natural disaster for which the Governor has declared a state of emergency. The allocated funds shall supplement funding from insurance or any other local, state, or federal government disaster assistance.
- (b) For purposes of this section, and notwithstanding any other section of this chapter, school districts and county offices of education determined by the board to be impacted by a natural disaster as described in subdivision (a) are deemed to meet the requirements set forth in Section 17075.10.
- (c) Notwithstanding any other law, a school district or county office of education that receives assistance under this section shall be entitled to retain savings from a project and use those savings for other high-priority capital outlay purposes consistent with the requirements of subdivision (c) of Section 17070.63.
- (d) (1) A grant provided pursuant to this section shall not affect the applicant's eligibility for any other program under this chapter.
(2) Notwithstanding paragraph (1), a portable classroom purchased pursuant to subdivision (a) shall be included in the determination of eligibility for new construction funding pursuant to Section 17071.75.
- (e) The board may provide any other assistance to a school district or county office of education determined by the board to be impacted by a natural disaster as described in subdivision (a).

(Added by Stats. 2024, Ch. 81, Sec. 19. (AB 247) Effective July 3, 2024. Operative November 6, 2024, pursuant to Sec. 30 of Ch. 81.)

School Facility Program (SFP) Regulation Section 1859.51(i) states:

The baseline eligibility for new construction determined on the Form SAB 50-03 will be adjusted as follows:

...

(i) Reduced by the number of pupils housed, based on loading standards pursuant to Education Code Section 17071.25(a)(2)(A), in any Classroom Provided after the baseline eligibility was determined by the Board with the exception of those pupils housed or to be housed in a classroom:

...

(4) That is a portable classroom leased for a period of less than five years, whether in a single lease or cumulative total of several leases.

(5) That is a portable classroom that needs to be leased beyond five years to provide interim housing in a modernization or new construction project provided

AUTHORITY (cont.)

the cumulative lease term does not exceed a specified time period as determined by the SAB not to exceed three years on each qualifying project. For this purpose, a project means all work contained in a single set of construction plans.
...

SFP Regulation Section 1859.70(a) states:

(a) A district seeking New Construction or Modernization funding shall complete and file Form SAB 50-04, concurrently or after completing the applicable requirements in Sections 1859.20 and 1859.40. The Board shall only provide New Construction funding if the Approved Application was received by the OPSC prior to the date of Occupancy for any classrooms included in the construction contract. After the date of Occupancy of any classroom in the construction contract, a School District will be ineligible to seek New Construction funding and the classrooms will be reduced from the baseline eligibility pursuant to Section 1859.51(i) if not previously reduced.

SFP Regulation Section 1859.82.1 states, in part:

...
Approved Applications requesting Facility Hardship Program funding shall be submitted to OPSC within 12 months of DSA approval for the scope of work mitigating the identified health and safety threat. If the project does not require DSA approval, then the Approved Application for funding must be received within the 6 months following project completion, as demonstrated by the earliest of the following: the date that the notice of completion of the project has been filed; occupancy of any portion of the project Facility; or when the School Buildings or components of the School Buildings in the project are currently in use by the district. If a district demonstrates that extreme or unusual circumstances prevented the submission of an eligible application within the applicable timeline outlined above, OPSC may allow up to an additional 6 months for submittal.

Other Statutory References

EC Section 17071.75 – New Construction Eligibility Determination

After a one-time initial report of existing school building capacity has been completed, the ongoing eligibility of a school district for new construction funding shall be determined by making all of the following calculations:
(a) A school district that applies to receive funding for new construction shall use the following methods to determine projected enrollment:
(1) A school district that has two or more schoolsites each with a pupil population density that is greater than 115 pupils per acre in kindergarten and grades 1 to 6, inclusive, or a schoolsite pupil population density that is greater

AUTHORITY (cont.)

than 90 pupils per acre in grades 7 to 12, inclusive, as determined by the Superintendent using enrollment data from the California Basic Educational Data System for the 2004–05 school year, may submit an application for funding for projects that will relieve overcrowded conditions. That school district may also submit an alternative enrollment projection for the fifth year beyond the fiscal year in which the application is made using a methodology other than the cohort survival enrollment projection method, as defined by the board pursuant to paragraph (2), to be reviewed by the Demographic Research Unit of the Department of Finance, in consultation with the department and the Office of Public School Construction. If the Office of Public School Construction and the Demographic Research Unit of the Department of Finance jointly determine that the alternative enrollment projection provides a reasonable estimate of expected enrollment demand, a recommendation shall be forwarded to the board to approve or disapprove the application, in accordance with all of the following:

- (A) Total funding for new construction projects using this method shall be limited to five hundred million dollars (\$500,000,000), from the Kindergarten-University Public Education Facilities Bond Act of 2004.
 - (B) The eligibility amount for proposed projects that relieve overcrowding is the difference between the alternative enrollment projection method for the year the application is submitted and the cohort survival enrollment projection method, as defined by the board pursuant to paragraph (2), for the same year, adjusted by the existing pupil capacity in excess of the projected enrollment according to the cohort survival enrollment projection method.
 - (C) The Office of Public School Construction shall determine whether each proposed project will relieve overcrowding, including, but not limited to, the elimination of the use of Concept 6 calendars, four track year-round calendars, or busing in excess of 40 minutes, and recommend approval to the board. The number of unhoused pupil grants requested in the application for funding from the eligibility determined pursuant to this paragraph shall be limited to the number of seats necessary to relieve overcrowding, including, but not limited to, the elimination of the use of Concept 6 calendars, four track year-round calendars, or busing in excess of 40 minutes, less the number of unhoused pupil grants attributed to that school as a source school in an approved application pursuant to Section 17078.24.
 - (D) A school district shall use the same alternative enrollment projection methodology for all applications submitted pursuant to this paragraph and shall calculate those projections in accordance with the same districtwide or high school attendance area used for the enrollment projection made pursuant to paragraph (2).
- (2) A school district shall calculate enrollment projections for the fifth year beyond the fiscal year in which the application is made. Projected enrollment shall be determined by using the cohort survival enrollment projection system,

AUTHORITY (cont.)

as defined and approved by the board. The board may supplement the cohort survival enrollment projection with any of the following:

(A) The number of unhoused pupils that are anticipated as a result of dwelling units proposed pursuant to approved and valid tentative subdivision maps.

(B) Modified weighting mechanisms, if the board determines that they best represent the enrollment trends of the district. Mechanisms pursuant to this subparagraph shall be developed and applied in consultation with the Demographic Research Unit of the Department of Finance.

(C) An adjustment to reflect the effects on kindergarten and first grade enrollment of changes in birth rates within the school district or high school attendance area boundaries.

(3) (A) A school district may submit an enrollment projection for either a 5th year or a 10th year beyond the fiscal year in which the application is made. A school district that bases its enrollment projection calculation on a high school attendance area may use pupil residence in that attendance area to calculate enrollment. A school district that uses pupil residence shall do so for all high school attendance areas within the district. A pupil shall not be included in a high school attendance area enrollment projection based on pupil residence unless that pupil was included in the California Basic Educational Data System (CBEDS) report of the district for the same enrollment year. The board may require a district to provide a reconciliation of the districtwide CBEDS and residency data. The board also may adopt regulations to specify the format and certification requirements for a school district that submits residency data.

(b) (1) Add the number of pupils that may be adequately housed in the existing school building capacity of the applicant school district as determined pursuant to Article 2 (commencing with Section 17071.10) to the number of pupils for whom facilities were provided from any state or local funding source after the existing school building capacity was determined pursuant to Article 2 (commencing with Section 17071.10). For this purpose, the total number of pupils for whom facilities were provided shall be determined using the pupil loading formula set forth in Section 17071.25.

(2) Subtract from the number of pupils calculated in paragraph (1) the number of pupils that were housed in facilities to which the school district or county office of education relinquished title as the result of a transfer of a special education program between a school district and a county office of education or special education local plan area, if applicable. For this purpose, the total number of pupils that were housed in the facilities to which title was relinquished shall be determined using the pupil loading formula adopted by the board pursuant to subparagraph (B) of paragraph (2) of subdivision (a) of Section 17071.25. For purposes of this paragraph, title also includes any lease interest with a duration of greater than five years.

(c) Subtract the number of pupils pursuant to subdivision (b) from the number of pupils determined pursuant to paragraph (2) of subdivision (a).

AUTHORITY (cont.)

- (d) The calculations required to establish eligibility under this article shall result in a distinction between the number of existing unhoused pupils and the number of projected unhoused pupils.
- (e) Apply the increase or decrease resulting from the difference between the most recent report made pursuant to former Section 42268, as that section read on June 30, 2013, and the report used in determining the baseline capacity of the school district pursuant to subdivision (a) of Section 17071.25.
- (f) For purposes of calculating projected enrollment pursuant to subdivision (a), the board may adopt regulations to ensure that the enrollment calculation of individuals with exceptional needs receiving special education services is adjusted in the enrollment reporting period in which the transfer occurs and three previous school years as a result of a transfer of a special education program between a school district and a county office of education or a special education local plan area. However, the projected enrollment calculation of a county office of education shall only be adjusted if a transfer of title for the special education program facilities has occurred. The regulations, if adopted, shall ensure that if a transfer of title to special education program facilities constructed with state funds occurs within 10 years after initial occupancy of the facility, the receiving school district or school districts shall remit to the state a proportionate share of any financial hardship assistance provided for the project pursuant to Section 17075.10, if applicable.
- (g) For a school district with an enrollment of 2,500 or fewer, an adjustment in enrollment projections shall not result in a loss of ongoing eligibility to that school district for a period of five years from the date of the approval of eligibility by the board.

EC Section 17078.64 – Charter Schools

- (a) In lieu of applying for funding under this article, a school district may elect to include facilities for a charter school that would be physically located within its geographical jurisdiction within its application for funding pursuant to the general provisions of this chapter, other than this article. However, the project would be outside the scope of this article, would not be subject to its provisions, and shall comply with this chapter in the same manner as any noncharter project. Any per-pupil eligibility that is used for that project shall not, also, support any project under this article.
- (b) Except for those provisions in which the authority is expressly required or authorized to adopt regulations pursuant to this article, the board in consultation with the authority shall adopt regulations to implement this article. The board may adopt, amend, or repeal rules and regulations pursuant to this article as emergency regulations. Until July 1, 2004, the adoption, amendment, or repeal of these regulations is conclusively presumed to be necessary for the immediate preservation of the public peace, health, safety, or general welfare within the meaning of Section 11346.1 of the Government Code.

AUTHORITY (cont.)

(c) This article is not applicable to projects funded with the proceeds of state general obligation bonds approved by the voters prior to January 1, 2002.

PROPOSED REGULATIONS

Section 1859.2. Definitions.

...

"Form SAB TBD" means the *Interim Housing and Natural Disaster Assistance Request (Form SAB TBD) (Revised xx/25)*, incorporated by reference.

...

"Interim Housing" means the rental, purchase, or lease of classrooms used to house pupils temporarily displaced as a result of either the modernization of classroom facilities, or as a result of a natural disaster for which the governor has declared a state of emergency, pursuant to Education Code Section 17075.20.

...

Note: Authority cited: Sections 17075.20, 17070.35 and 17078.64, Education Code.

Section 1859.80. General.

A district shall qualify for hardship assistance by demonstrating one or more of the following:

(a) A financial hardship, as provided in Section 1859.81, which prevents the district from funding all or a portion of the matching share requirement for a SFP grant.

(b) Qualification for facility hardship as provided in Sections 1859.82.1 or 1859.82.2.

(c) An Excessive Cost Hardship Grant as a result of added construction costs due to unusual circumstances as provided in Section 1859.83.

(d) Qualification for interim housing and natural disaster assistance as provided in Sections 1859.84.1 or 1859.84.2 as a result of a natural disaster for which the Governor has declared a state of emergency.

Note: Authority cited: Sections 17075.10 in effect as of January 1, 2024 and amended by Assembly Bill 247, Chapter 81, Statutes of 2024, and with the successful passage of Proposition 2 on November 5, 2024, 17075.20 and 17070.35, Education Code.

Section 1859.84. Interim Housing and Natural Disaster Assistance

A school district or county office of education may apply for interim housing and natural disaster assistance as a result of a natural disaster for which the Governor has declared a state of emergency, which is subject to verification with the Governor's Office of Emergency Services to confirm its open state at the time of application submittal.

For purposes of this Section, a natural disaster may include, but is not limited to, events such as earthquakes, wildfires, floods, landslides, storms, hurricanes, tsunamis, and other natural catastrophes.

For purposes of Section 1859.84 through Section 1859.84.2, a "district" shall mean a school district or county office of education.

Applications received on or after October 31, 2024 are subject to matching share requirements in accordance with Section 1859.77.1.

Note: Authority cited: Section 17075.20, Education Code.

Section 1859.84.1. Interim Housing Assistance

All applications pursuant to this section shall be funded in the order of receipt of a Form SAB TBD as outlined in Section 1859.93.1. Any grants provided for the purposes of this section shall be provided as a new construction project and allocated on a 50 percent state share basis, unless adjusted pursuant to Section 1859.77.1, and shall supplement insurance, local, state, and federal disaster assistance.

An impacted district is eligible for the Board to provide assistance for purposes of procuring interim housing, including, but not limited to, the leasing or acquisition of portable classrooms as a result of the following:

(a) The district has had facilities lost or damaged by a natural disaster for which the Governor has declared a state of emergency.

(1) The declared state of emergency must be "open" at the time of application submittal.

(b) For requests for assistance to lease portable classrooms, the district must submit the following:

(1) Form SAB TBD.

(2) Documentation which includes actual costs of the portable classroom(s), including but not limited to invoices or lease agreements.

(3) Documentation, such as invoices, which include, but is not limited to, any work associated with placing the portable classrooms on a site.

(4) In lieu of actual costs, districts may provide bid proposals, quotes, or other documentation that supports the amount of the funding request.

(c) For requests for assistance to purchase portable classrooms, the district must submit the following:

(1) Form SAB TBD.

(2) Documentation which includes actual costs of the portable classroom(s), including but not limited to, invoices or purchase agreements.

(3) Documentation, such as invoices, which include, but is not limited to, any work associated with placing the portable classrooms on a site.

(4) In lieu of actual costs, districts may provide bid proposals, quotes, or other documentation that supports the amount of the funding request.

(d) (1) For all requests for assistance to lease and/or purchase portable classroom(s), the district must provide documentation demonstrating that costs associated with interim housing have not been covered by insurance proceeds or any other local, state, or federal government disaster assistance, outlined in the Form SAB TBD.

(2) If the district reasonably expects to receive future insurance proceeds or any other government disaster assistance attributable to costs of interim housing, the district must provide all of the following:

(A) An estimate of the insurance proceeds or any other government disaster assistance the district may receive for interim housing expenses;

(B) A narrative statement indicating the necessity of interim housing assistance prior to receipt of insurance proceeds or any other government disaster assistance for this purpose; and

(C) Acknowledgement of the reporting requirement and potential of a future amendment to any Apportionment, pursuant to subsection (i)(1).

(e) Adjustments to the School Facility Program per-pupil grants.

(1) The district's New Construction Eligibility will be adjusted for any net increase in classroom capacity resulting from the lease and/or purchase of portable classrooms in the project pursuant to Section 1859.51(i).

(2) Notwithstanding Section 1859.51(i), if the portable classrooms leased and/or purchased for interim housing are removed from school use at the time of the repair/replacement of impacted school facilities, the adjustment in (1) shall be reversed.

(f) Districts that qualify for Financial Hardship assistance pursuant to Section 1859.81 may file an application for funding and determination of program eligibility in advance or in conjunction with an application for interim housing assistance.

(g) Interim housing assistance may not be requested in place of:

(1) An SFP New Construction or Modernization application

(2) A Facility Hardship application

(i) Any grants provided in accordance with this Section shall be adjusted as follows:

(1) For projects that received funding pursuant to this section prior to receiving final insurance proceeds or government disaster assistance for interim housing, grants will be reduced by 50 percent of any insurance proceeds or government disaster assistance collected by the district for the project. Any proceeds and government disaster assistance collected after Apportionment shall be reported to OPSC and the Apportionment will be amended accordingly.

Note: Authority cited: Section 17075.20, Education Code.

Section 1859.84.2. Natural Disaster Assistance

All applications pursuant to this Section shall be funded in the order outlined in Section 1859.93 and 1859.93.1. Any grants provided for the purposes of this Section shall supplement insurance, local, state, and federal disaster funding.

A district may qualify for any other natural disaster assistance not pursuant to SFP Regulation Sections 1859.82 or 1859.84.1 at the Board's discretion if it is determined by the Board to be impacted by a natural disaster as described in Section 1859.84. In making a determination to provide any other natural disaster assistance, the Board may consider factors including:

(a) The submittal of a Form SAB TBD that includes the following:

(1) The background and circumstances which prompted the district's request.

(2) Information relevant to the request that demonstrates funding from insurance proceeds; and local, state, and federal government disaster assistance is insufficient to rehabilitate or reconstruct school facilities that existed at the time of the natural disaster.

(3) A statement explaining why the Board should grant the district's request based on law, regulation, or another basis, including but not limited to:

(A) Justification if the project seeks funding in lieu of an SFP Facility Hardship Program application because the project exceeds the exception for Approved Application submittal deadlines outlined in Section 1859.82.1,

(B) If the project seeks funding for an SFP New Construction or Modernization application, the district must submit the following:

1. An Application for Funding (Form SAB 50-04)

(b) The district's New Construction Eligibility will be adjusted for any net increase in classroom capacity in the project pursuant to Section 1859.51(i).

Note: Authority cited: Section 17075.20, Education Code.

Section 1859.93. Modernization Project Funding Order.

Applications shall be funded as follows:

- (a) First, to applications for Facility Hardship rehabilitation projects pursuant to Sections 1859.82.1(c) and 1859.82.2(c) in order of receipt of an Approved Application for funding; then
- (b) Second, to applications for Modernization projects pursuant to Section 1859.84.2 in order of receipt of a Form SAB TBD; then
- ~~(bc)~~ If there are no applications pursuant to subsection (a) or (b), to applications for modernization funds in order of receipt of an Approved Application for funding.

Note: Authority cited: Section 17070.35, Education Code.

Reference: Section 17074.15 ~~and~~ 17075.15, and 17075.20, Education Code.

Section 1859.93.1. New Construction Project Funding Order.

Applications, except those identified in ~~(ee)~~ through ~~(eg)~~ below, shall be funded as follows:

- ~~(a) First, to applications for Facility Hardship pursuant to Section 1859.82 in order of receipt of an Approved Application for funding; then, to applications pursuant to Section 1859.84.1 in order of receipt of a Form SAB TBD; then~~
- (b) Second, to applications for Facility Hardship pursuant to Section 1859.82 in order of receipt of an Approved Application for funding; then,
- (c) Third, to applications pursuant to Section 1859.84.2 in order of receipt of a Form SAB TBD; then
- ~~(bd)~~ If there are no applications pursuant to subsection (a), (b) or (c), to applications for New Construction Grant(s) in order of receipt of an Approved Application for Funding.
- ~~(ee)~~ Approved Applications for New Construction Grant(s) funded with the proceeds of state bonds approved by the voters prior to January 1, 2002.
- ~~(df)~~ Approved Applications for New Construction Grant(s) authorized by Education Code Sections 17078.10 through 17078.30.
- ~~(eg)~~ Approved Applications that utilize pupil eligibility derived from the Alternative Enrollment Projection method. These applications shall be funded in order of receipt once the OPSC and the DRU have approved the Alternative Enrollment Projection method or the Alternative Enrollment Projection annual update.

Note: Authority cited: Section 17070.35, Education Code.

Reference: Sections 17072.25, 17070.35, ~~and~~ 17075.15, and 17075.20, Education Code.

ATTACHMENT A7

OFFICE OF PUBLIC SCHOOL CONSTRUCTION STAKEHOLDER MEETING April 10, 2025

PROPOSED REGULATORY AMENDMENTS FOR A FIVE-YEAR SCHOOL FACILITIES MASTER PLAN

PURPOSE

To continue discussion from the February 13, 2025 meeting regarding proposed regulatory amendments resulting from Assembly Bill (AB) 247, the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2), which was approved by a majority of California's voters on November 5, 2024, related to the submittal of a Five-Year School Facilities Master Plan (Master Plan).

AUTHORITY

See Attachment A7a.

BACKGROUND

Proposition 2 adds Education Code (EC) Section 17070.54, which requires school districts to submit a five-year school facilities master plan, or an updated five-year school facilities master plan, approved by the governing board of the school district as a condition of participating in the School Facility Program (SFP) on or after October 31, 2024.

In summary, Proposition 2 requires the following:

- School districts to include specified minimum elements as part of the required five-year school facilities master plan, including an inventory of existing facilities, sites, and property.
- The Office of Public School Construction (OPSC) to develop guidelines, in consultation with the California Department of Education (CDE), that school districts may use to guide the development of the school facilities master plan.
- OPSC to develop guidelines or standards, in consultation with CDE, that school districts must use to develop and submit the inventory of existing facilities, sites, and property, which must include specified elements.
- The State Controller's Office (SCO) to include instructions in the K-12 audit guide to verify that all required components are reflected in participating school districts' school facilities master plans.
- School districts to update their school facilities master plans to reflect any changes in enrollment, capacity, or other areas, as appropriate for purposes of participating in the SFP.

Before and after the passage of Proposition 2, OPSC continued to accept SFP applications on a flow basis. To acknowledge the statutory requirements for the Master Plan and to allow continued acceptance of applications, the State Allocation Board (Board) adopted the timelines and policy listed below on December 3, 2024. This policy is intended to ensure that program applicants are aware of their future obligation to comply with the new statute. Therefore, pending the effective date of the program regulations for

BACKGROUND (cont.)

the Master Plan, applications submitted to OPSC on or after October 31, 2024, must conform to the following:

- All districts must submit a governing board resolution acknowledging the submittal timeline requirements for the type of application submitted, and acknowledging that the project may be rescinded for failure to submit with the required components.
- Facility Hardship and Seismic Mitigation Program projects must submit the Master Plan with the substantial progress certification for construction of the project or the 100 percent complete *Expenditure Report* (Form SAB 50-06), whichever occurs first following the approval of the regulations.
- New Construction and Modernization applications received October 31, 2024, through 12 months following the Office of Administrative Law's (OAL) approval of regulations must submit the Master Plan at time of processing.
- New Construction and Modernization applications received more than 12 months following OAL approval of regulations must submit the Master Plan with the application.

A sample resolution is available on the OPSC website under Resources/School Facility Master Plans and is linked here: [School Facility Master Plans](#).

STAFF ANALYSIS/DISCUSSION

At the February 13, 2025 meeting, OPSC prepared a report that provided an overview of the new and amended statutory requirements regarding the SFP Master Plan codified in EC Section 17070.54. This report is a follow up to the first meeting on this topic and will focus on responding to the feedback OPSC received either during or after that meeting.

First and foremost, OPSC thanks everyone that was able to view, attend, or participate in this meeting. OPSC also thanks you for the thoughtful and thorough feedback that was submitted. While the chart that follows contains only comments received during or after the February 13, 2025 meeting and OPSC's responses to those comments, the entire topic is still open for any feedback, not just the points raised in the comments below. Please refer to the February 13, 2025, item for the full list of OPSC's suggestions related to the Master Plan.

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p>1. What will be the process of intake/review/approval of a Facilities Master Plan? Will the plan be evaluated at application intake before being officially received, or do the plans need to be approved by OPSC or another agency such as CDE prior to application submittal?</p>	<p>1. When the district's Master Plan is submitted to OPSC, the intake review process will just be to confirm that the Master Plan has been submitted with all the necessary documents in support of the plan, as outlined in EC Section 17070.54(c). Once the application package is confirmed to have all required components, including all components of the Master Plan, the application package will be given a received date.</p> <p>After being given a received date, a second team will then review the Master Plan documents more deeply to validate that documents submitted contain all of the components required by EC Section 17070.54 and will work with the district to obtain any missing elements or clarifications that are needed. If the district cannot complete this process in a timely fashion, the application will be returned, and the district can reapply when it has the missing elements prepared.</p> <p>It is not necessary for OPSC, CDE, or any other agency to review the plan before submittal to OPSC.</p>
<p>2. How does OPSC determine that a Master Plan is for "five years?" What if the plan does not specify length to completion? Many school districts prepare plans of long term needs well beyond five years.</p>	<p>2. EC Section 17070.54(a) states that the school district shall submit a "five-year school facilities master plan, or updated five-year school facilities maser plan" as a condition of participation in the SFP. Based on feedback received at the February 13, 2025 meeting, including this comment, OPSC recognizes that many districts implement plans with terms longer than just five years.</p> <p>OPSC recommends the following in response to these comments:</p> <ul style="list-style-type: none"> • When a Master Plan is submitted

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>2. (cont.) with a funding application, the plan must have at least four years remaining on the term of the plan, based on the date the plan was approved by the school board. For school districts that are very active in the SFP and submit applications several times per year, this means that, at most, those districts must only update their plan annually. For districts that only submit applications every few years, for example, they would need to update their plans prior to submittal of their next application.</p> <ul style="list-style-type: none"> • OPSC also recommends that, at minimum, each district would readopt or certify that plans longer than five years in duration have at least four years remaining on the term of the plan, based on the date the plan was approved by the school board. This approach is proposed to meet the requirements in EC Section 17070.54 and for consistency with the approach mentioned above. • OPSC will accept Master Plans that have only made amendments to a previous plan, so long as the amended plan meets all of the requirements outlined in EC Section 17070.54 and the district submits both the previous plan and the amendments. • For plans that exceed five years in duration, OPSC recommends that to comply with the statutory requirement to have a five-year plan, the applicant clarifies which of the components of the plan are for the next five years and which components of the plan are longer term, and/or the plan should be detailed enough that it outlines goals over the course of the term of the agreement, which would inherently illustrate which goals are within the

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>2. (cont.) next five years.</p> <ul style="list-style-type: none"> • Additionally, EC Section 17070.54(c)(3) requires the Master Plan to include a projection of enrollment growth over the following five years, which would also tie into the relevance for highlighting or clarifying which aspects of the plan are to occur over the next five years, versus longer than five years into the future. • Additionally, one stakeholder response mentions that because the objective is to ensure the Master Plan represents a current and effective planning tool, it makes sense that districts should submit updates or addendums when the Master Plan undergoes a significant and substantial modification. <p>OPSC agrees with this, and proposes a requirement to update the Master Plan to be current if any changes have taken place, or certify that no significant changes have occurred and that the previously submitted Master Plan still meets all statutory and regulatory requirements, whenever a new application is submitted.</p>
<p>3. Can the Master Plan be for a select number of schools that are pursuing funding?</p>	<p>3. OPSC interprets EC Section 17070.54 as requiring a comprehensive, districtwide scope for the Master Plan. This is reinforced in several of the outlined requirements, such as the examination of the district’s enrollment growth, assessed value, deferred maintenance plan, as well as the requirement to complete a site-by-site inventory of “every school in the district” in EC Section 17070.54(d).</p>
<p>4. Is the cost to develop the Master Plan an eligible SFP expenditure?</p>	<p>4. Generally speaking, the SFP considers the costs to develop Master Plans as an operational expense and the EC sections that define eligible uses of new construction and modernization funds do not include</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p>4. (cont.) operational expenses as eligible expenditures.</p> <p>However, the costs necessary to develop a Master Plan can be an eligible expenditure specifically for small school district projects receiving the Project and Construction Management grant that is part of the newly enacted Small Size School District Program established in EC Sections 17078.35, 17078.36, 17078.37, and 17078.38. EC Section 17078.35(d) specifies that the new Project and Construction Management grant is available for small school districts to obtain services that, in part, assist with project planning. SFP expenditures eligible for development of a Master Plan are limited to the state and local matching share of the Project and Construction Management grant.</p>
<p>5. There were several questions, or statements, related to OPSC creating a template for Master Plans.</p> <p>Additionally, OPSC received a request to develop a form that outlines all Master Plan components required by law and provides simple guidance to applicants regarding the methods available to meet the requirements. It was suggested that this form would then be used by school districts to sign and certify they meet the requirements in EC Section 17070.54.</p>	<p>5. OPSC plans to create resources such as a checklist aimed at helping districts to create Master Plans, which will be made available through OPSC’s website and/or in the OPSC Online Database.</p> <p>Currently, CDE has a resource website that provides guidelines for development of long-range facilities plans. CDE intends to update this website to support the requirements in EC Section 17070.54.</p> <p>As required in statute, OPSC will develop guidelines, in consultation with CDE, that school districts may use to guide the development of the Master Plan required as a condition of participating in the SFP.</p> <p>OPSC notes that EC Section 17070.54 expressly requires submittal of the Master Plan as a condition of SFP participation. Therefore, self-certification alone will not satisfy the statutory requirements.</p>
<p>6. Does the Master Plan have to be updated if the project the plan is being submitted with was originally included in the plan, but is now complete and the district is seeking reimbursement?</p>	<p>6. Yes, submittal of a Master Plan, or updated Master Plan, is a condition of participation in the SFP, and the Master Plan is not limited to the project being submitted. Rather, it is a comprehensive five-year plan</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	6. (cont.) for the entire district projecting into the future.
<p>7. Will the project list and capital planning budget be analyzed to the degree that it will be reconciled by OPSC with projects on submitted applications?</p>	<p>7. No, the Master Plan is a planning document for school districts. OPSC is only verifying that the required documents and elements have been included and that the level of detail is sufficient to meet the statutory requirements.</p>
<p>8. Will OPSC perform any form of review other than simply confirming that the requirements have been met? If so, what type of review will be conducted?</p>	<p>8. Currently OPSC’s proposal is to review each submittal for compliance with the required components of the Master Plan as outlined in EC Section 17070.54. If any of those components are missing, OPSC will work with the district to obtain the missing documents or request the Master Plan be updated.</p>
<p>9. The process for updating plans should be flexible and uncomplicated. Districts should not have to reinvent the wheel. Supplements and addendums to existing documents should be the approved method.</p>	<p>9. OPSC agrees with this comment, and agrees to accept supplements, addenda, or updates to already existing, or previously submitted, Master Plans so long as the updates reflect a current five-year plan for the district and all components required by EC Section 17070.54 are included and have local school board approval. When submitting supplements, addenda, or updates, districts must also include a copy of the Master Plan that has been amended.</p>
<p>10. Feedback was received from several sources that indicated support for inclusion of an understanding of climate impacts such as extreme heat and flooding in district Master Plans.</p> <p>Other elements suggested for inclusion in submitted Master Plans were prioritization of green schoolyards, outdoor learning spaces, and climate adaptation.</p> <p>It was also suggested that OPSC provide guidance on climate resilience, eliminating barriers and catalyzing natural greening at schools, and obtaining information on making investments to create healthy climate-resilient school buildings.</p>	<p>10. OPSC’s core responsibility is to ensure that the Master Plans are submitted in accordance with EC Section 17070.54. OPSC recognizes that climate-related goals are laudable, and related expenditures are normally eligible uses of SFP funds. Additionally, Proposition 2 establishes a new energy efficiency supplemental grant that can help further these objectives.</p> <p>As required in statute, OPSC will develop guidelines, in consultation with CDE, that school districts may use to guide the development of the Master Plan required as a condition of participating in the SFP. OPSC and CDE intend to include information regarding climate resilience as a component</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	10. (cont.) of these guidelines for districts' consideration in developing their Master Plans.
<p>11. Districts should be permitted to use existing documentation, along with supplemental documentation as needed, to satisfy the requirements for the components of a Master Plan submittal as outline in EC Section 17070.54.</p>	<p>11. OPSC intends to provide flexibility to allow school districts to develop the Master Plan in a method that suits their purposes beyond the SFP submittal requirements, as long as each of the components of the Master Plan required by EC Section 17070.54 is included in the submittal.</p>

Other Topics Requiring Discussion and Feedback

In addition to the stakeholder feedback mentioned above, the issues below need further development, and OPSC seeks feedback on these topics.

Remaining Duration of Existing Master Plans

As discussed above, OPSC proposes that the duration of any submitted Master Plan has at least four years remaining. As a result, an updated Master Plan, or acknowledgement the plan is still valid and meets all statutory and regulatory requirements for at least four more years, would be required with each application submittal. OPSC's intent with this proposal is to ensure the Master Plan information is up to date and pertinent, without necessarily requiring a new Master Plan with each submittal. Districts that are less active in the program and do not submit new projects every year would only be required to submit a Master Plan upon participation in the SFP. OPSC proposes that the date the most recent Master Plan was adopted by the applicant's governing board be used as the date from which to measure when a new, or updated Master Plan should be submitted. For example, if an application with a valid five-year Master Plan was adopted by the local school governing board on April 15, 2026, that plan could be submitted with any applications submitted until April 15, 2027.

Inventory of Existing Facilities and Sites

When this topic was discussed at the February 13, 2025 meeting, OPSC sought feedback on how leveraging existing documentation could be used to help fulfill this aspect of the Master Plan requirements. Many of the forms used to establish and/or adjust eligibility for either new construction or modernization can be used as a starting point for obtaining this information. Both the *Existing School Building Capacity* (Form SAB 50-02), which is districtwide, and the *Eligibility Determination* (Form SAB 50-03), which is site-specific, can be used to obtain information on the facilities as they existed when those forms were submitted to OPSC. The applicant can then use that information to develop their Master Plan. Additionally, OPSC often receives site-specific summaries that include building names, square footage, age, and use of each space. Those documents could also be used to examine the site as it was when the document was submitted and then used to amend the information to be current.

STAFF ANALYSIS/DISCUSSION (cont.)

Enrollment Projection

Another requirement of the Master Plan that could leverage the information already entered into existing forms, is the requirement to project enrollment growth over the five years after the Master Plan submittal. The *Enrollment Certification/Projection* (Form SAB 50-01) can be used for this purpose in part or in whole depending on if the application submittal coincides with the same enrollment reporting year as the latest Form SAB 50-01. The form requires at least the current and three previous years of enrollment data to perform the projection. The applicant can take the data submitted on a current or previous Form SAB 50-01 and use that information to determine its five-year projected enrollment. OPSC's website also currently features an enrollment calculator to assist districts in determining projected enrollment.

Capital Planning Budget Requirements and Deliverables

At the February 13, 2025 meeting, OPSC identified the capital planning budget required in EC Section 17070.54(c)(4) and to date, OPSC has not received comments or suggestions on the format of this required Master Plan component. To fulfill this requirement, OPSC proposes that applicants submit a narrative that outlines the anticipated budget and expenditure needs to complete the projects intended within the next five years that are included in the plan.

OPSC welcomes further feedback on these topics.

AUTHORITY**Education Code Section 17070.54 – General Provisions**

- (a) As a condition of participating in the school facilities program, a school district shall submit to the department a five-year school facilities master plan, or updated five-year school facilities master plan, approved by the governing board of the school district.
- (b) The school facilities master plan submitted pursuant to subdivision (a) shall include information on the school district's eligibility for state bond funding pursuant to this chapter.
- (c) The school facilities master plan shall include, but is not limited to, all of the following information:
- (1) An inventory of existing facilities, sites, and property pursuant to subdivision (d).
 - (2) Existing classroom capacity, as determined pursuant to Sections 17071.10 and 17071.25.
 - (3) Projected enrollment growth for the applicable school district over the next five years, accounting for growth pursuant to Sections 17071.75 and 17071.76.
 - (4) A capital planning budget outlining the applicable school district's projects.
 - (5) The financing and other funding sources that would be used to support the acquisition of the applicable schoolsite, new construction project, modernization project, and lead testing and remediation projects.
 - (6) Verification of the applicable school district's current assessed value from the appropriate local government entity that collects and maintains this information.
 - (7) The school district's deferred maintenance plan certified pursuant to Section 17070.75.
 - (8) A narrative describing how the school facilities master plan is consistent with the goals, actions, and services identified in the school district's local control and accountability plan for the first state priority, as described in paragraph (1) of subdivision (d) of Section 52060, as it relates to school facilities.
- (d) The department, in consultation with the State Department of Education, shall develop guidelines that school districts may use to guide the development of the school facilities master plan required as a condition of participating in the school facilities program. The department, in consultation with the State Department of Education, shall develop guidelines or standards that school districts shall use to develop and submit the inventory required pursuant to paragraph (1) of subdivision (c) for every school in the school district, including, but not limited to, all of the following:
- (1) The year each building at the school that is currently used for instructional purposes was constructed.
 - (2) The square footage of each building that is currently used for instructional purposes.
 - (3) The year, if any, each building that is currently used for instructional purposes was last modernized.
 - (4) The pupil capacity of the school.
 - (5) The age and number of portable buildings at the school.
 - (6) Whether the school has any of the following:
 - (A) A cafeteria or multipurpose room or hybrid facility.
 - (B) A library.

AUTHORITY (cont.)

(C) A gymnasium.

(e) The Controller shall include the instructions necessary to verify that all of the required components of this section are reflected in a participating school district's school facilities master plan in the audit guide required by Section 14502.1, as part of the audit procedures required pursuant to Section 41024.

(f) The school district shall update its school facilities master plan to reflect any changes in enrollment, capacity, or other areas, as appropriate for purposes of participating in the school facilities program.

(Added by Stats. 2024, Ch. 81, Sec. 5. (AB 247) Effective July 3, 2024. Operative November 6, 2024, pursuant to Sec. 30 of Ch. 81.)

School Facility Program Regulations References

Laws and Regulations can be accessed here: [Laws, Regulations for School Construction Projects](#)

School Facility Program Forms can be accessed here: [Forms](#)

ATTACHMENT B



Email to: OPSCCommunications@dgs.ca.gov

February 27, 2025

Rebecca Kirk
Executive Officer
Office of Public School Construction
707 3rd Street, 4th Floor
West Sacramento, CA 95605

Dear Ms. Kirk,

We write in response to the request from the Office of Public School Construction (OPSC) for public comment on the Proposition 2 Implementation Regulatory Process and the agenda items from the February 13th meeting. This letter addresses implementation regarding Topic 7 (Five Year School Facilities Master Plan) of the Stakeholder Meetings. We are grateful for the opportunity to participate in this process and look forward to continued dialogue in the coming months.

UndauntedK12 is a nonprofit organization working to ensure that every student in California has the opportunity to attend a safe, healthy, and climate resilient school. Ten Strands is a California-based nonprofit dedicated to advancing environmental literacy within California's TK–12 school system.

California's K–12 public school students are increasingly at risk from severe weather, including more days of extreme heat, wildfires, and increased flooding. These severe weather impacts affect student health, safety, and learning, including lost school days when school campuses are closed. The good news is that [research shows](#) that resilient school buildings and grounds can keep students healthy, safe, and learning in spite of these impacts. In addition, energy efficient buildings and grounds can help advance California's energy goals.

We are grateful that Proposition 2, or Assembly Bill (AB) 247, specifically cites the opportunity for school districts to invest in climate adaptation and energy efficiency strategies to protect students in the face of climate change and simultaneously help the state meet its energy goals. Specifically:

- 17072.35 (a) states that a grant for new construction can be used for “costs of designs and materials that promote the efficient use of energy and water, the maximum use of natural lighting and indoor air quality” as well as “for the costs of design, materials, and

ATTACHMENT B

construction to advance state energy goals pursuant to state law, support outdoor learning environments, or to directly shade and protect pupils from higher average temperatures, which may include incorporating nature and natural materials.”

- 17074.25 (a) (1) states that “a modernization apportionment may be used for the costs of design, materials, demolition, and construction to advance state energy goals pursuant to state law, support outdoor learning environments, or to directly shade and protect pupils from higher average temperatures, which may include incorporating nature and natural materials.”
- 17077.35 provides for a grant adjustment not to exceed 5% for projects that “promote school facility energy efficiency approaching the ultimate goal of school facility energy self-sufficiency and pollution reduction.” This section states that “[e]nergy efficiency components that enable school facilities to advance state energy goals and adapt to higher average temperatures that pose a threat to the health and safety of pupils and staff are eligible for inclusion into a project pursuant to this section.”

The creation of school buildings and grounds that are both resilient to climate change impacts and that help the state meet its energy goals requires dedicated planning, which is best accomplished through a district’s Facilities Master Planning process. **As OPSC works in consultation with the California Department of Education (CDE) to develop guidelines that school districts may use in the development of the School Facilities Master Plan, we encourage you to reference and recommend publicly available resources that can help school districts understand and plan for the climate impacts in the coming years and to provide access to other state resources that may help them in their planning.**

A recent report by the California Collaborative for Educational Excellence, in partnership with UndauntedK12 and Ten Strands, entitled [*Climate Adaptation and Resilience at California’s K–12 Schools: Actions and Recommendations for State and District Leadership*](#) outlined four major climate change impacts that will impact schools.

1. **Extreme Heat:** Heat is already significantly impacting California schools and students, with effects projected to worsen in coming years. By 2045, more than one of every three California students will live in a community with at least 120 days of high heat per year—defined as days over 87 degrees or over the local high heat threshold—practically ensuring disruption to the school calendar.
2. **Wildfires and Wildfire Smoke:** The majority of California school districts today are at moderate or higher risk for wildfires, and evidence-based models suggest that by 2050, smoke pollution will be 50 percent greater than in 2020.
3. **Storms and Flooding:** Caught between intensifying drought and increased precipitation, California’s school buildings are at risk. Prediction is difficult, but patterns suggest that by 2029, nearly every part of California will see average precipitation above historical norms.
4. **Grid Instability:** Storms, flooding, and heat waves, which bring the threat of wildfire, all threaten to disrupt the energy grid. With longer and more frequent power outages,

ATTACHMENT B

California can expect increased risks to schools, including unhealthy or unsafe learning conditions, and closures that disrupt learning.

In developing guidance in consultation with the CDE, we recommend including the following publicly-available resources that will support district leaders to understand how severe weather will impact their district in the coming years and actions they can take in designing school buildings and grounds. Those resources include:

- [Climate Adaptation and Resilience at California's K–12 Schools: Actions and Recommendations for State and District Leadership](https://drive.google.com/file/d/1EZ-CMz0qK2-SK-rLdnARPYcq56H-aTPo/view) provides specific recommendations to district leaders to address climate impacts in school building and ground design. (<https://drive.google.com/file/d/1EZ-CMz0qK2-SK-rLdnARPYcq56H-aTPo/view>)
- [CA Data Initiative for Environmental and Climate Action in TK-12 Schools](https://sites.google.com/tenstrands.org/ca-envlit-scrs-data-project/explore-data-focus-areas/broader-context-factors/climate-impacts-broader-context?authuser=0) provides localized data to allow district leaders to better understand and plan for environmental and climate related data projections over the course of four decades. (<https://sites.google.com/tenstrands.org/ca-envlit-scrs-data-project/explore-data-focus-areas/broader-context-factors/climate-impacts-broader-context?authuser=0>)
- [HVAC Choices for Student Health and Learning](https://www.undauntedk12.org/hvac-rmi) provides district leaders with specific recommendations in selecting HVAC systems that advance student health and safety. (<https://www.undauntedk12.org/hvac-rmi>)
- [Decarbonization Roadmap for School Building Decision Makers](https://newbuildings.org/resource/decarbonization-roadmap-guide-for-school-building-decision-makers/) provides a guide for school leaders to pursue healthy, efficient, carbon neutral school design, construction and operation. (<https://newbuildings.org/resource/decarbonization-roadmap-guide-for-school-building-decision-makers/>)

In addition to these resources, we also recommend including the following California state resources that can serve as a guide for decision-makers to align their efforts with state energy goals:

- [Executive Order B-55-18](https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf) outlining California's goal to achieve carbon neutrality by 2045. (<https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>)
- [California Climate Adaptation Strategy](https://climateresilience.ca.gov) (<https://climateresilience.ca.gov>)
- [California's Extreme Heat Action Plan: Protecting Californians from Extreme Heat](https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Climate-Resilience/2022-Final-Extreme-Heat-Action-Plan.pdf) (<https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Climate-Resilience/2022-Final-Extreme-Heat-Action-Plan.pdf>)

ATTACHMENT B

We appreciate OPSC's continued effort to provide a transparent process to enable district leaders and partners to support the development of regulations to implement Proposition 2. We look forward to continuing to engage with OPSC throughout this process to help ensure that districts can access much needed facility funding while also creating healthy, safe, and resilient learning environments while furthering the state's energy goals.

Sincerely,



Jonathan Klein
Co-Founder and CEO
UndauntedK12



Andra Yeghoian
Chief Innovation Officer
Ten Strands

February 28, 2025



Rebecca Kirk, Executive Officer
Office of Public School Construction
707 Third Street, Fourth Floor
West Sacramento, CA 95605

Re: Proposition 2: SSDA Comments on Facilities Master Plan

Dear Ms. Kirk,

On behalf of the **Small School Districts' Association (SSDA)**, representing over 600 small and rural school districts throughout California, I want to express sincere gratitude for the opportunity to provide input and participate in the stakeholder sessions regarding the implementation of **Proposition 2**. We recognize the monumental task OPSC faces in balancing many diverse district needs while ensuring fair and equitable access to state funding while striving to create a framework that serves the best interests of students across California. Your commitment to engaging with stakeholders and seeking feedback is greatly appreciated, and we commend the agency's efforts to develop thoughtful and effective regulations.

As we continue working together over the next several months, SSDA remains committed to ensuring that the regulations crafted under Proposition 2 equitably address the needs of small and rural school districts. To that end, we would like to offer specific comments regarding the **Five-Year School Facilities Master Plan** and other critical components under discussion. These comments are specific to the second stakeholder meeting and are additive to those comments that I included in the chat during the session.

The Five-Year School Facilities Master Plan: A Barrier for Small and Rural Districts

While SSDA understands that a **Facilities Master Plan** is a requirement under Proposition 2, we strongly urge modifications to ensure that small and rural school districts are not unfairly burdened.

For small and rural districts, the current master planning model is unnecessarily complex, costly, and administratively burdensome. Most of these districts are not anticipating or planning for significant growth or large-scale expansion projects; instead, they are focused on **maintaining and modernizing their existing facilities**.

Unlike their larger counterparts, most small and rural school districts operate with a single administrator responsible for all district operations—including facilities. They already have

ATTACHMENT B

a clear understanding of their facilities' needs without the need for a lengthy, consultant-driven master plan. Requiring them to produce a five-year plan designed for large, urban districts will only serve as a barrier to accessing state bond funds, which is counterproductive to Proposition 2's purpose.

The Consultant Accessibility Problem

Compounding this issue is the **difficulty in securing consultant support** for small and rural school districts. The firms that typically assist school districts with facilities master planning and state funding applications are less inclined to take on small projects, as these projects are often:

- **Smaller in scope and budget**, making them less financially attractive.
- **Located in remote rural areas**, which are costly and time-consuming for consultants to travel to.
- **Time-intensive for minimal return**, particularly when compared to large-scale urban projects.

As a result, **small and rural LEAs are left with little to no external support**, forcing already short-staffed districts to navigate a highly technical planning and application process alone. Without outside consultants willing to assist, many districts will struggle to complete the required Facilities Master Plan, effectively shutting them out of Proposition 2 funding opportunities.

Recommendation: Advance Funding for Master Plan Development

To prevent the Facilities Master Plan requirement from becoming a financial barrier, SSDA recommends that OPSC provide advance funding to any school district under 2,500 ADA to conduct the required master plan.

- **Small districts should not have to front the cost** of creating a state-mandated plan that is a prerequisite for accessing facilities funding. Most small and rural school districts would be taking money from their general fund used primarily for their educational program to fund the facilities master plan study.
- **Many small and rural districts lack general fund reserves** to cover consultant fees or staff time needed to draft the plan.
- **Advance funding ensures equity**, allowing all districts—regardless of size or financial capacity—to participate in Proposition 2 programs.

Without this upfront funding mechanism, the requirement will effectively exclude many of California's smallest districts from accessing the facilities funding they need.

ATTACHMENT B

A Practical and Streamlined Facilities Master Plan for Small and Rural Districts

To ensure that Proposition 2 does not become an unintended obstacle, SSDA proposes a streamlined approach to the Facilities Master Plan that relies heavily on documentation that has already been developed and meets the intent of the law while remaining practical and feasible for small school districts.

The plan should begin with an **Executive Summary** that outlines the district's primary facility-related goals, whether it be ensuring safety, maintaining functionality, or addressing critical repairs. This section should include a brief district snapshot summarizing the number of schools, student enrollment, and unique challenges such as geographic isolation or fluctuating enrollment. Many Districts have used this type of language in their LCAP or SARC documentation. Additionally, a basic enrollment projection should be provided, reflecting a simple five-year trend rather than requiring complex forecasting. Finally, the summary should include a practical planning timeline that spans five years, with the flexibility to adjust as conditions change. The plan should be revisited no more frequent than every five years.

A Needs and Conditions Assessment should follow, documenting the current state of school facilities. Instead of requiring expensive third-party evaluations, this section should be based on the District's Facilities Inspection Tool ("FIT") tool and a simple walkthrough conducted by district leadership and maintenance staff. It should note the same essential information found in the FIT, such as roof conditions, HVAC systems, plumbing, and other infrastructure concerns. The focus should remain on immediate and high-priority repairs, ensuring that urgent health and safety needs are addressed first. Cost estimates should be based on local maintenance staff expertise or informal contractor input, reducing the need for external consultants.

The plan should also include a **Space Utilization and Flexibility Review**, allowing districts to describe how they are using their current facilities and whether existing spaces could be repurposed. Since small and rural districts typically do not anticipate significant expansion, this section should focus on maximizing the use of current classrooms, multipurpose spaces, and other facilities rather than long-term growth strategies. Any potential adjustments, such as minor facility modifications or the use of portable buildings, should be noted without requiring extensive redevelopment plans.

Funding and Resource Planning should be a straightforward section identifying available and anticipated funding sources for facility improvements. Given that small districts primarily focus on maintenance rather than large-scale development, this section should emphasize cost-effective solutions, such as upgrading existing infrastructure with energy-efficient materials or leveraging grants for critical repairs. Instead of requiring long-term

ATTACHMENT B

capital expenditure projections, the plan should outline realistic, near-term funding strategies that align with state bond funding and local revenue sources.

Finally, a **Community Engagement and Oversight** section should ensure transparency and local involvement in facility planning. The plan should describe how the school board and community are kept informed of facilities priorities, whether through board meetings, community forums, or informal discussions. This section should also clarify that facility planning remains a dynamic process, allowing for adjustments as needed while maintaining the overall five-year framework.

Key Implementation Considerations

1. What duration of the five-year plan should remain to be acceptable?

- SSDA recommends that the master plan be updated once every five years—no more, no less. The Plan should be a discretionary tool for the district’s governing board and should not have to be revised or updated outside of that timeframe. The plan, once approved, should be valid for a full five-year period regardless of when a grant application is submitted.

2. Is the remaining duration based on the application received date, OPSC processing date, or Board funding date?

- The application received date should not be used as the reference point for determining a plan’s validity. Given the long timelines in state approvals, using the Board funding date could force districts to revise plans unnecessarily before receiving funding. Small and rural school districts should not be required to review or revise a plan within the five-year period beginning with the date the plan was adopted by the LEA’s governing board.

3. When must updated plans be submitted?

- Small and rural districts should only be required to update their Facilities Master Plan once every five years. The Facilities Master Plan should be considered a discretionary document adopted by a governing board of directors of the school district and should not be subject to any requirements for updating. Districts should not be required to submit updates simply because they are applying for a grant during an existing plan’s lifecycle.

ATTACHMENT B

Final Recommendation

SSDA urges OPSC to:

1. In addition to allowing the cost of the Facilities Master Plan to be included as an allowable project cost, **OPSC should advance funding for any school district under 2,500 ADA** to develop a Facilities Master Plan, ensuring that no district is shut out of funding due to financial constraints.
2. **Adopt a simplified, right-sized Facilities Master Plan model** that is **practical, cost-effective, and minimizes unnecessary burdens** on small districts.
3. **Ensure that master plans are only updated once every five years, without OPSC authority to require additional revisions.**

We appreciate the opportunity to submit these comments and look forward to working together to ensure that Proposition 2 truly benefits all students across California—without creating unnecessary roadblocks for small and rural communities.

Please contact me, or our legislative advocate, Cathy McBride (cathy@capitoladvisors.org), if we can provide any additional information.

Sincerely,



Yuri Calderon

Executive Director

Small School Districts' Association (SSDA)

Yuri@ssda.org

ATTACHMENT B



February 28, 2025

Communications Team
Office of Public School Construction (OPSC)
707 Third St, 4th Floor
West Sacramento, CA 95605

RE: FEEDBACK ON TOPICS PRESENTED DURING FEBRUARY 13, 2025 STAKEHOLDER MEETING FOR IMPLEMENTATION OF PROPOSITION 2 FOR THE SCHOOL FACILITY PROGRAM

To Whom it May Concern:

Hancock Park & DeLong, Inc. appreciates the opportunity to continue providing feedback regarding the topics presented during the second Proposition 2 Implementation meeting held on February 13, 2025. Below is a summary of our comments and concerns:

• **Topic 6 – Interim Housing and Natural Disaster Assistance**

- We appreciate OPSC recognizing that the costs for interim housing assistance reimbursement may create barriers for some school districts. Is it possible to create a standard classroom-based emergency interim housing grant, similar to a design grant or a preliminary grant, that could be adjusted for a construction or “final” apportionment after additional information is provided and other government or insurance assistance is considered?

• **Topic 7 – Five-Year Master Plan**

- We encourage OPSC to reconsider the costs of developing a facility master plan (FMP) as an eligible project expenditure. The costs to prepare a master plan range from tens of thousands of dollars to several hundreds of thousands of dollars. There does not appear to be a mechanism to provide funding for the preparation of an FMP, so to also disallow the expense as an allowable project expenditure creates an even larger hurdle for school districts and could be characterized as an unfunded mandate for participation in the School Facility Program (SFP).
- We encourage OPSC to consider allowing an FMP to be valid for a full five years after school district board approval and then allowing 5-year updates to the FMP thereafter. A well-developed FMP can take anywhere from a few months up to a year (or beyond) for a district to prepare, and often includes significant community and stakeholder input, so requiring a school district to update the FMP annually is overly burdensome and unnecessary. Furthermore, small school districts are less likely to have the funding, staff or resources necessary to prepare annual updates, which will likely limit their ability to participate in the SFP if this becomes a requirement.

ATTACHMENT B

- **Topic 8 – Small Size School District Program**

- We request that OPSC provide clarification on how pupils are to be counted for the Small Size School District program, within the *Enrollment Certification/ Projection* (SAB Form 50-01) instructions. The instructions seem to have conflicting direction on when to include enrollment if students are both “receiving non-classroom-based instruction” and “attending independent study”. Many (or most) independent study programs do not have students attending physical classrooms 100 percent of the school day, and are considered “non-classroom-based”, however they do still have the need for a certain number of classrooms.
- For certain small-to-medium sized districts, including the below charter school students may mean the difference between being above or below the 2,500 pupil cut-off to be a small school district:
SAB Form 50-01 instructions – Include: “Students receiving Classroom-Based Instruction in Charter Schools located within the district boundaries and are enrolled in the same grade levels or type served by the district regardless if the district chartered the school.” This may be a rare occurrence, but it would be unfortunate if a district was not able to participate in the program due to a factor that is largely out of their control.

- **Topic 9 – Energy Efficiency Supplemental Grant**

- No comments

- **Topic 10 – Supplemental Grants for Minimum Essential Facilities**

- No comments

- **Topic 11 – Transitional Kindergarten (TK) Supplemental Grant**

- We request that districts be able to utilize contracts signed *prior to* July 3, 2024 to justify projects under this program. This program is essentially taking the place of the CA Preschool, Transitional Kindergarten, Full Day Kindergarten Facilities Grant Program (CAPSTKFDKFGP), with the same intent, and we believe that districts who anticipated being able to participate in the CAPSTKFDKFGP should not be excluded from requesting the TK supplemental grant.

Please let us know if you have any questions or would like additional information regarding these topics. We look forward to continuing conversations as these topics progress with development.

Sincerely,

Jessica Love
Hancock Park & DeLong

ATTACHMENT B

Rebecca Kirk, Executive Director
Office of Public School Construction
Department of General Services
707 Third St
West Sacramento, CA 95605

Re: Proposition 2 Implementation Stakeholder Meeting #2, Master Plan Requirement

Dear Ms. Kirk,

On behalf of the undersigned school districts and education management organizations, we write to provide comments and recommendations on the implementation of the Master Plan requirement under Proposition 2.

For many school districts, the inclusion of the Master Plan requirement has been the greatest source of uncertainty surrounding Proposition 2. We believe that the Legislature's clear intention behind including the requirement is to provide additional transparency and

ATTACHMENT B

accountability to the School Facility Program, and not to create costly and overly burdensome hurdles that could impede access to the program.

The feedback below recognizes that California's 1,000 school districts and their facilities programs are diverse in every sense of the term, from racial and ethnic demographics to geographic region, to socioeconomic needs, to district size, to languages spoken. No one-size-fits-all approach will perfectly address the unique circumstances of every district. However, we believe these principles will enable the greatest number of districts to comply with the letter and spirit of the Master Plan requirement of Proposition 2 in the least disruptive manner.

We recommend that the design of the Master Plan at a minimum address the following principles:

1) Existing Materials Can Satisfy Master Plan Requirements

To the extent practicable, districts should be permitted to satisfy the Master Plan requirement using existing responsible documents without an implied obligation to hire outside architects or consultants to produce new materials. While many districts will not have an existing Master Plan (or comparable project list) that meets all of EC 17070.54's requirements, we recommend that they be able to submit supplementary materials that satisfy the missing Proposition 2 components. Further, we recognize that any included supplemental materials must be approved by the governing board of the district.

2) Master Plan Verification Form

OPSC should provide a Master Plan Verification Form that outlines all the components required by law and provides simple guidance to districts regarding the various methods available to meet the requirements. This document, which could be attached to project applications, will allow districts to certify that their Master Plan includes all the components required by law, and function as a guide to collect/produce the missing components in order to assemble a compliant Master Plan.

Additionally, we recommend including the school board approval date for the current five-year Master Plan and, the school board approval date for the previously approved five-year Master Plan, if applicable, in the form.

3) Timeline of Updates to Master Plan

Rather than submitting a five-year Master Plan with every application, we recommend that school districts provide the school board approved Master Plan to OPSC no more than once every five years. For individual applications, districts would only need to submit the certified form. OPSC staff could then verify the information using their records. This approach would significantly reduce administrative burdens for both school districts and OPSC.

ATTACHMENT B

Because Master Plans are by their very nature snapshots in time, districts must have the flexibility to deviate from the plan as needs evolve. Therefore, we recommend adding language clarifying that OPSC cannot require an updated Master Plan or a supplement to the Master Plan if a district submits a project not included in the approved plan. Similarly, districts must not be restricted to pursuing only projects explicitly listed in the approved Master Plan, ensuring greater flexibility in addressing needs as circumstances arise.

4) Period of Validity of Existing Master Plan

Any Master Plan (five-year or more) that was approved by governing board less than four years ago should be acceptable. Master Plans that were approved more than four years ago also should be acceptable now, but an updated plan should be approved and submitted before the previous plan approval is more than five years old, but no case should any one project be required to submit multiple Master Plans. We recommend that the age of a Master Plan should begin on the date of a district's governing board approval.

5) Eligible Operational Expenditures

Any costs associated with creating a Master Plan or supplementary components of the plan should be eligible as a state bond fundable expenses. This is especially important for smaller districts that lack the capacity or funding to develop a compliant Master Plan with existing resources. Additional clarity will be needed detailing how a district will be able to apply for these costs.

Thank you for the opportunity to provide our perspectives on the structure of the Proposition 2 Master Plan requirement. Together, these recommendations will provide necessary clarity and to the field. We look forward to ongoing stakeholder discussions as the design is further refined.

Sincerely,



Yuri Calderon
Executive Director
Small School Districts' Association



Sasha Horwitz
Legislative Advocate
Los Angeles Unified School District

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Dr. Sierra Cook
Director of Government Relations
San Diego Unified School District



Carlos Rojas
Chief Governmental Relations Officer
Governmental Relations
Kern County Superintendent of Schools



Lucy Salcido Carter, MA, JD
Director of Policy and Governance
Office of the Superintendent
Alameda County Office of Education



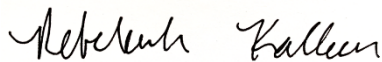
Jeffrey A. Vaca
Chief Governmental Relations Officer
Office of the Riverside County
Superintendent of Schools



Mishaal Gill
Director of Policy and Advocacy
California Association of School
Business Officials



Dorothy Johnson
Legislative Advocate
Association of California School
Administrators



Rebekah Kalleen
Legislative Advocate
Coalition for Adequate School Housing

ATTACHMENT B

Email to: OPSCCommunications@dgs.ca.gov

February 14th, 2025

Rebecca Kirk
Executive Officer
Office of Public School Construction
707 3rd Street, 4th Floor
West Sacramento, CA 95605

Dear Ms. Kirk,

We write in response to the request from the Office of Public School Construction for public comment on the Proposition 2 Implementation Regulatory Process and the materials from January 30th and February 13th meetings. This letter addresses implementation regarding Topic 3 and Topic 7 of the Stakeholder Meetings.

Children Now is a non-partisan, whole-child research, policy development and advocacy organization dedicated to promoting children's health, education, and well-being in California. The organization also leads The Children's Movement of California, a network of more than 5,600 direct service, parent, youth, civil rights, faith-based and community groups dedicated to improving children's well-being.

Topic 3, Attachment A3, of January 30th, 2025 Stakeholder Meeting: Eligible Expenses

We deeply appreciate the State's allocation of \$115 million for lead testing and remediation, as it provides local educational agencies (LEAs) an opportunity to continue to address their local remediation and testing efforts.

Section 17074.25. (a)(2) in Attachment A3 is missing any mention of testing as an eligible expense and only lists remediation—we request that testing be added back in as an eligible expense.

Additionally, Section 177077.60 (2)(c)(1) states that "A school district may request a grant for the replacement of a water outlet used for drinking or preparing food if the test results indicate lead levels for that water outlet exceed 15 parts per billion." While the replacement of the faucet or fixture may remediate the lead below 15 ppb, there will be some instances in which that is not sufficient and schools may need to install a filter or water filtration/hydration station.

We urge the Office of Public School Construction (OPSC) to allow the purchase of a certified filter as an eligible expense. If onsite water filtration is used to meet the requirements of this subdivision, the onsite water filtration device should be certified by an

ATTACHMENT B

independent American National Standards Institute (ANSI) accredited third-party certification body to NSF/ANSI 53 for lead reduction and NSF/ANSI 42 for particulate reduction (Class 1). Additionally, in meeting the requirements of this subdivision, a fixture should meet the requirements of Sections 116875 and 116876 of the Health and Safety Code.

Additionally, lead testing results can vary by time of day, time since the faucet was last used, and method of testing. We request that: 1) sampling should be conducted in accordance with Modules 4 and 5 of the [United States Environmental Protection Agency's "3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities"](#) manual, or subsequent United States Environmental Protection Agency guidance as identified by the State Water Resources Control Board. Flushing should not be used to collect a first draw sample; and 2) a laboratory that evaluates a water sample for purposes of this section should have current accreditation pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code.

Lastly, there is a widespread lack of testing and remediation data for California's schools, which leaves parents, students, and teachers in the dark about the quality of their drinking water. In administering these grants, it is imperative that there is public reporting and contribution to a more comprehensive picture of California's school drinking water.

Topic #7, Attachment A7 of February 13th, 2025 Stakeholder's Meeting: Facilities Master Plan

Across California, more than 10,000 public schools serve more than 5.8 million K-12 students on over 131,000 acres of public land, every day. Much of that land is paved and lacks trees and shade. As temperatures continue to rise due to climate change, this situation is becoming a crisis for most public schools across the state.

When nature is absent in children's environments, they are denied the mental, physical, social-emotional, and learning benefits they need. Unshaded school grounds are dangerously hot. Research shows that on a sunny 90°F day, unshaded asphalt can reach 140°F or more and rubber "safety" surfaces can be more than 165°F. High temperatures severely impact children. Children engage in vigorous physical activity outdoors, and since they have smaller body mass to surface area ratios than adults, they are more vulnerable to heat.

Under Governor Gavin Newsom, California has adopted an [Extreme Heat Action Plan](#) outlining a strategic and comprehensive set of state actions to adapt and strengthen resilience to extreme heat. See more on the action plan [here](#).

ATTACHMENT B

As you review school facility regulations and develop guidelines with the State Department of Education for the development of master plans, it is critical to update them with an understanding of climate impacts such as extreme heat and additional flooding. We urge you to update existing policies that guide design for public school facilities to eliminate barriers and catalyze natural greening at schools. Focus the policies and guidelines on direct benefits for children, including tree canopy coverage goals and incorporate nature-based outdoor learning spaces as instructional spaces and as critical components of all schools' facilities, treated the same way as indoor classrooms and sports facilities.

According to the California Department of Public Health, school districts and schools can help reduce heat exposure in schools and schoolyards through engineered and nature-based solutions. Examples include the following:

- Improve school building envelopes (for example, insulation, double-paned windows, window shading and air sealing). From a broader climate resiliency perspective, these improvements would ideally be completed in combination with other health and safety upgrades to ensure healthy air and indoor environmental quality (for example, lead, mold and asbestos remediation).
- Install cool roofs on schools.
- Plant trees to provide shade outdoors, both for the buildings and play areas.
- Install other outdoor shade structures, such as shade sails over playground equipment, outdoor dining and other outdoor common areas.
- Decrease asphalt cover and increase cool pavements, permeable surfaces, and natural ground cover, like gardens.
- Transition toward schoolyards with more trees and other greenery to reduce heat burden.
- Install or improve cooling equipment (like air conditioners or heat pumps), prioritizing energy-efficient equipment whenever possible.

The California Schoolyard Forest System® seeks to create schoolyard forests across PreK-12 public school grounds statewide to directly shade and protect students from extreme heat and rising temperatures due to climate change. This initiative was founded by Green Schoolyards America, California Department of Education, the California Department of Forestry and Fire Protection (CAL FIRE), and Ten Strands.

Climate and forestry experts recommend a 30% tree canopy coverage in cities to mitigate climate impacts. California schools are far from this goal. A multiyear investment in reaching 30% tree canopy coverage at K-12 public schools will achieve the following benefits:

ATTACHMENT B

- Vulnerable students protected from extreme heat and other climate impacts
- Improved health and learning outcomes
- Climate and environmental benefits, including carbon sequestration and stormwater management
- Workforce development opportunities
- Improved community resilience and health outcomes for millions of Californians

Long-term planning and sustained public funding investments are necessary to bring green schoolyards to scale across the state. In addition, policy and institutional barriers need to be addressed to ensure that those investments are successful in creating green, climate-resilient school grounds that serve the most vulnerable children and communities.

As OPSC adopts Proposition 2 guidelines for school facilities master plans, we encourage that the agency:

- Explicitly mention and prioritize green schoolyards and nature-based outdoor learning spaces as integral components of all school facilities for climate mitigation, health, and instruction in the same way as sports fields, classrooms, and other building spaces are mentioned and prioritized
- Support the inclusion of climate adaptation-related master planning, and incorporate climate resilience into guidance for facilities master plans at all schools
- Provide guidance to support climate resilience projects in vulnerable communities, including green schoolyards
- Highlight eligible investments schools can make to transition to safe, healthy, climate-resilient school buildings and grounds

We appreciate the transparency and accessibility of OPSC's stakeholder engagement process and look forward to the implementation of Proposition 2 while empowering LEAs to design and modernize their schools through an equity lens. This will improve children's environmental health and school climate resilience for the next generation of students and educators.

Sincerely,



Colleen Corrigan
Senior Policy Associate
Children Now

ATTACHMENT B

February 28, 2025

Rebecca Kirk, Executive Director
Office of Public School Construction
Department of General Services
707 Third St
West Sacramento, CA 95605

Re: Proposition 2 Implementation Stakeholder Meeting #2

Dear Ms. Kirk,

On behalf of the Los Angeles Unified School District (Los Angeles Unified), we appreciate OPSC's Proposition 2 stakeholder engagement and welcome the opportunity to provide input on the proposed amendments to the School Facility Program in response to Proposition 2.

The comments and recommendations provided below correspond to the topics raised and materials provided for the February 13, 2025, Implementation Stakeholder Meeting #2.

Topic #6 – Interim Housing and Natural Disaster Assistance (Attachment A6)

The issue of interim housing assistance following a natural disaster raises several important considerations regarding eligibility, funding mechanisms, and regulatory clarifications.

Classroom Inventory Adjustments for Disaster-Related Replacements

In reference to Education Code section 17075.20(d)(2), OPSC states that any classroom portable purchased under section 17075.20(a) must be included in a district's classroom inventory, either when establishing new construction eligibility or through an adjustment if eligibility has already been established. However, clarification is needed to specify that when a portable is acquired

ATTACHMENT B

solely to replace a classroom destroyed in a natural disaster, it should not be added to the inventory, as it does not constitute an increase in capacity.

Charter School Eligibility for Interim Housing Assistance

There is ambiguity in the eligibility criteria for charter schools seeking interim housing assistance. While OPSC's analysis on page 6 concludes that charter schools cannot apply directly, a school district may apply on behalf of a charter school occupying district-owned facilities. However, Education Code section 17075.20(a) does not explicitly exclude charter schools on non-district-owned sites. Clarification is needed to determine whether a school district can apply on behalf of a charter school located on a non-district-owned site or if such schools are entirely ineligible for assistance.

Funding Challenges and Timing of Assistance

Timely access to interim housing assistance funding is critical, as schools need to accommodate displaced students immediately following a disaster. Waiting for reimbursement may present financial hardships. One proposed solution is for districts to submit a verified quote for the minimum amount needed and later reconcile any excess once insurance or other public assistance funds are received.

Los Angeles Unified recommends an upfront apportionment based on verified quotes, allowing districts to receive full funding at the outset. Since disasters are unplanned events, many districts lack the immediate resources to cover a matching share. Providing 100% of the verified quote upfront ensures districts can address their needs without delay. Once insurance and public assistance funding is secured, a true-up process would reconcile actual expenses, with any excess funds returned to the State.

Additionally, clarification is needed regarding the timing of state and local funds. If immediate access is not available, a clear timeline should be established to ensure school districts can plan accordingly.

In summary, regulatory clarification, eligibility adjustments, and a shift toward upfront funding mechanisms would improve the effectiveness of interim housing assistance, ensuring that schools can respond swiftly to natural disasters while maintaining financial accountability.

Topic #7 – Five-Year Master Plan (Attachment A7)

Master Plan Updates and Timing:

In response to OPSC's request for stakeholder feedback, Los Angeles Unified recommends the following:

- Updates or addendums to a district's master plan should be required no more than once every five years, with the five-year period beginning on the date of the district governing board's approval. The plan's duration should be determined solely based on this approval date.
- Any updates or addendums must receive formal approval from the district's governing board.

ATTACHMENT B

Eligibility Determination and Funding Considerations:

Education Code (EC) 17070.54(b) requires that a facilities master plan include information on a district's eligibility for state bond funding. However, clarification is needed regarding the time period this eligibility should represent and whether second-round funding must be included.

To address these concerns, Los Angeles Unified recommends the following:

- Eligibility should be determined within one calendar year of the governing board's approval of the master plan. Second-round funding should be excluded unless its methodology and application are fully finalized.
- Regulations should explicitly state that a master plan's eligibility calculations are based on the original site snapshots used to establish baseline eligibility, rather than the building inventory submitted as part of the master plan.
- Regulations should clarify that if a district uses SAB forms to estimate eligibility, these forms serve solely as a calculation tool and will not be processed as official submissions.

Master Plan and Closeout Audits:

Los Angeles Unified requests clarification on which version of the master plan is required at the time of the closeout audit—whether it should be the version submitted as part of the application or an updated version. Clear guidance on this requirement will help ensure consistency and compliance across districts.

Additionally, we recommend the development of a standardized master plan certification checklist to help districts document key information and certify the plan's completeness. This checklist would provide a clear framework for compliance, streamline the review process, and reduce administrative uncertainties.

Stakeholder Engagement and Master Plan Cost Reimbursement:

Los Angeles Unified recommends that stakeholders be given the opportunity to provide input on the guidelines and standards for school site inventories, which will be discussed between OPSC and CDE. Ensuring stakeholder involvement will help create clear, practical, and equitable standards that reflect the needs of all districts.

Additionally, the cost of developing a facilities master plan has been discussed, with OPSC indicating it may be classified as an operational expense. Los Angeles Unified recommends revisiting this classification to determine whether master plan development qualifies as an eligible expenditure, allowing districts to receive appropriate funding support for this mandated documentation.

"Current" Assessed Value (EC 17070.54(c)(6))

Los Angeles Unified seeks clarification on what qualifies as "current" assessed value and whether entities other than governmental agencies may be considered appropriate for verification purposes.

ATTACHMENT B

"Modernization" (EC 17070.54(d))

Los Angeles Unified requests a clear and comprehensive definition of "modernization" beyond what is outlined in EC 17070.15 to ensure consistency in its application.

Year of Construction and Modernization (EC 17070.54(d))

Los Angeles Unified seeks clarification on how the year of construction and modernization should be determined—whether based on the year construction commenced, the year it was completed, or the year DSA plans were approved. Additionally, we request guidance on the appropriate date to use for non-DSA projects if a DSA approval date is recommended for determining the "last modernized" date. Lastly, we recommend that regulations explicitly state that this data will not be used to determine modernization eligibility.

Topic #9 – Energy Efficiency Supplemental Grant (Attachment A9)

Requesting the Supplemental Grant: Options 1 and 2

Under both options presented, OPSC has stated that the DSA Tracker "Type of Program" must match the SFP funding category being requested. However, it remains unclear how DSA and SFP will interpret a district's application for like-kind replacement when filed under SFP Modernization funding, despite the actual work involving new building construction. Los Angeles Unified requests further clarification on how DSA will evaluate and assign the Title 24 Energy Requirement program in such cases. If DSA's classification does not align with SFP's funding definitions, we recommend that this mandate be reconsidered or removed to prevent unnecessary funding complications for districts.

If a tiered approach is selected, the thresholds outlined in OPSC's Option 1 would need to be revised. The recent revision to EC 17077.35 does not establish a minimum threshold for grant eligibility—it simply requires that the proposed building exceed nonresidential building energy-efficiency standards without specifying by how much. Given this, any tiered approach should align with the intent of the statute and avoid imposing arbitrary thresholds that are not legally required. Additionally, if a tiered approach is implemented, Los Angeles Unified requests calculation examples to clarify how the grant amount would be determined under each tier.

Los Angeles Unified recommends adopting Option 2, as it provides a simplified and streamlined approach. However, there are inconsistencies regarding how DSA would confirm a project exceeds Title 24 energy requirements. OPSC has indicated that the appropriate DSA Project Tracker checkbox would be selected to confirm compliance, but it would not display a percentage. This, in turn, would trigger the need for additional documentation, such as the "DSA Energy Compliance Review Verification Form", to prove that Title 24 standards were exceeded. If no minimum percentage exceedance is required, then the DSA Project Tracker should not need to display a percentage, nor should additional documentation be necessary. Additionally, if the DSA Energy Compliance Review Verification Form is to be required, it should be made available for review before it is incorporated into the process. Los Angeles Unified recommends addressing and clarifying these points before finalizing the selection and implementation of either option.

ATTACHMENT B

Topic #10 – Supplemental Grants for Minimum Essential Facilities (MEF) (Attachment A10)

Los Angeles Unified appreciates the ability to consider multiple funding options for the calculation of the supplemental grant for MEFs. Los Angeles Unified staff has performed an initial analysis based on the proposed options but is not prepared to make a recommendation without additional information from OPSC demonstrating how the calculation examples would compare. Therefore, we request that the next stakeholder materials include examples to facilitate comparison of the different funding options, including Use of Grants, Option 1, and Option 2.

Additionally, while the Use of Grants provision (2 CCR 1859.77.3) specifies that current CBEDS data be used to calculate the pupil amount requested, Los Angeles Unified recommends allowing the option to use a three-year average of CBEDS, similar to the flexibility provided under 2 CCR 1859.82.1 and 1859.82.2.

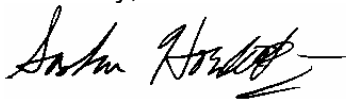
Lastly, we request clarification on the calculation of fundable toilet square footage, specifically whether a site-wide analysis will be conducted to determine if an existing site already meets the required toilet square footage for current enrollment.

Topic #11 – Transitional Kindergarten Classrooms Supplemental Grant (Attachment A11)

Los Angeles Unified appreciates the ability to consider multiple funding options for the calculation of the supplemental grant for Transitional Kindergarten Classrooms. Los Angeles Unified staff has performed an initial analysis based on the proposed options but is not prepared to make a recommendation without additional information from OPSC demonstrating how the calculation examples would compare to one another. Therefore, we request that the next stakeholder materials include examples to facilitate comparison of the different funding options.

If you have any questions regarding these comments, please contact Sasha Horwitz, Legislative Advocate: Sasha.Horwitz@lausd.net or (916) 443-4405.

Sincerely,



Sasha Horwitz
Legislative Advocate
Los Angeles Unified School District

ATTACHMENT B

Comments:

5-year school facility master plan by Richard Lyon on behalf of the **California Building Industry Association (CBIA)**.

California home builders are proud to have been a key participant in the formation of the SFP and take our role as a program participant and funding partner very seriously. CBIA strongly supported AB 247 along with the programmatic changes it brought about including the requirement for districts to prepare and submit a 5-year capital facilities master plan (FMP) updated periodically.

We believe that the potential for costs to spin out of control is exacerbated when districts fail to do adequate long-range capital facilities planning. At the same time, because the new master plan requirement is a condition precedent to districts participating in the SFP and receiving state funding, the process should be easy for districts to navigate, accommodating and flexible.

We appreciate the excellent work that the staff of OPSC has done to date to formulate regulatory language necessary to implement AB 247.

With that said, what follows is a bullet point response to a number of the issues raised in the staff report of February 13:

- New construction and modernization applications received October 31, 2024, through 12 months following OAL approval should submit their FMP at the time of OPSC application processing.
- New construction and modernization applications received more than 12 months from OAL approval should submit their FMP along with their initial application.
- The process for updating plans should be flexible and uncomplicated. Districts should not have to “reinvent the wheel.” Supplements and addendums to existing documents should be the approved method.
- As to the “process for supplementing,” i.e., when must updates be submitted, we will defer to districts on this matter, but because the objective is to ensure the FMP represents a current and effective planning tool it makes sense that districts submit updates/addendums when their FMP undergoes a significant and substantial modification.
- While this may be stating the obvious, we think it important for the regulations to definitively state that if a project application came to OPSC before 10-31-24, the Proposition 2 FMP requirements do not apply.

Thank you. We recognize that this is an ongoing process, and we appreciate the ability to comment on matters of concern to us.

Richard Lyon, RJLyonconsulting@gmail.com

On behalf of the California Building Industry Association (CBIA)

ATTACHMENT B

Via Email

February 28, 2025 (by noon)

Brian LaPask, Chief of Program Services
Office of Public School Construction
707 Third Street, Fourth Floor
West Sacramento, CA 95605
OPSCCommunications@dgs.ca.gov

**Re: Comments on 2/13/25 Proposition 2 Implementation Stakeholder Meeting,
Topic 7 – Five-Year School Facilities Master Plan (Attachment A7)**

Dear Mr. LaPask,

This communication responds to the Office of Public School Construction (OPSC)'s request for feedback regarding proposed regulatory amendments related to Five-Year School Facilities Master Plans (FMPs).

Clean Air Allies is a nonprofit parent/community stakeholder organization dedicated to improving indoor air quality in PK-12 schools as a matter of educational, environmental, and health import. As part of our California Alliance for Clean Air in Schools initiative, we've devoted significant attention to state school facilities funding and accountability mechanisms.

The following comments represent very preliminary thoughts based on the high-level staff analysis/discussion in Attachment A7 to the February 13, 2025 Proposition 2 Implementation Stakeholder Meeting Agenda and the meeting itself. More detailed comments in relation to future stakeholder proceedings are anticipated.

We appreciate OPSC's commitment to broad engagement and open dialogue in this process.

1. Implementation of Education Code § 17070.54(c)(8) Should Encourage School Districts to Center Conditions of Learning and the Educational Program in Facilities Planning; Recapitulation of Facility Inspection Tool (FIT) Scores Is Not Adequate to this End.

If safe, healthy school facilities are basic conditions of learning, not all school facilities spending is equal for educational purposes. A [2024 NBER Working Paper by Biasi et al.](#) found that "Investments in school infrastructure such as HVAC, safety and health, plumbing, roofs, and furnaces produce large increases in test scores, likely because they improve students' learning experiences," as compared to "more visible" spending such as on "athletic facilities and the expansion of classroom space" (31).

ATTACHMENT B

In [existing facilities master planning guidance](#), the California Department of Education (CDE) has emphasized that school facilities' form should follow educational function (7, 26). Existing CDE regulations state that "Educational facilities planned by school districts shall be: a. Evolved from a statement of educational program requirements which reflects the school district's educational goals and objectives." (CCR, Title 5, § 14001.)

Education Code § 17070.54's reference to Education Code § 52060, which involves Local Control and Accountability Plans (LCAPs), and in particular to that statute's own reference to *Williams*, evinces concern about the strategic alignment of school facilities planning with student safety, health, and learning. An important goal in implementation of § 17070.54 should be to encourage school districts to center conditions of learning and the educational program in their facilities planning.¹

In particular, Education Code § 17070.54 reads:

(c) The school facilities master plan shall include, but is not limited to, all of the following information: ... (8) A narrative describing how the school facilities master plan is consistent with the goals, actions, and services identified in the school district's local control and accountability plan for the first state priority, as described in paragraph (1) of subdivision (d) of Section 52060, as it relates to school facilities.

Education Code § 52060 comes under the article governing LCAPs, created in 2013 as part of adoption of the Local Control Funding Formula (LCFF). All school districts must adopt an LCAP triennially and update it each year in a process involving various stakeholders, including parent advisory committees, and the opportunity for public comment.

According to CDE's [LCAP Template Instructions](#), the LCAP process "serves three distinct, but related functions":

- "Comprehensive Strategic Planning," including around "hard choices ... about the use of limited resources to meet student and community needs";
- "Meaningful Engagement of Educational Partners," as "effective strategic planning will incorporate these perspectives and insights"; and
- "Accountability and Compliance" around "various requirements."

Under § 52060 et seq., a school district's LCAP must address eight LCFF/LCAP "priority" areas (for county offices of education, ten), setting and tracking progress around related goals, specific actions/services, and expenditures.

¹ [Existing CDE guidance on facilities master planning](#) states that "educational program" refers to the "curricula, learning support programs, programs, and persons to be served; defines educational requirements; and represents local community consensus on educational priorities" (1).

ATTACHMENT B

The first priority area, described by CDE as “[Priority 1 - Basic \(Conditions of Learning\)](#),” clearly references the landmark *Williams* settlement and implementing law aimed at ensuring that all California students have access to basic conditions of learning:

(d)(1) **The degree to which** the teachers of the school district are appropriately assigned in accordance with Section 44258.9, and fully credentialed in the subject areas, and, for the pupils they are teaching, **every pupil in the school district has sufficient access to** the standards-aligned instructional materials as determined pursuant to Section 60119, and **school facilities are maintained in good repair, as defined in subdivision (d) of Section 17002.** (Emphasis added.)

According to CDE, the “[desired results](#)” of focusing school district attention on LCFF/LCAP Priority 1 as it relates to facilities include that:

[They] develop and maintain facilities that promote the health and wellbeing of occupants, conserve energy and water, and promote clean indoor air. **[They] consider the manner in which a facility supports the educational program.** (Emphasis added.)

A [key consideration](#) for Priority 1 is “[resource alignment](#)”: “spending the right amount of money on the right thing at the right time.”

Thus, Education Code § 17070.54(c)(8) calls for school districts to address in “narrative” form how the FMP comports with Priority 1 of the LCFF/LCAP, which itself references *Williams* and is given shape through a process of comprehensive strategic planning, meaningful engagement, and accountability and compliance to ensure school facility conditions conducive to learning.

One can imagine an implementation of § 17070.54(c)(8) that simply invited school districts to include a few lines about recent Facility Inspection Tool (FIT) scores, given that the FIT is referenced in Education Code § 17002(d) and was created as a result of the *Williams* settlement. But such an approach would arguably provide little useful new information and forgo an opportunity for school district reflection on the alignment of facilities planning with provision of conditions of learning and support of the educational program.

The FIT as currently used is a reactive mechanism largely aimed at identifying urgent or emergency facilities conditions. (Compare Ed Code §§ 17002(d), § 35186(a-g), and 1240(c)(2)(E)(ii).) It relies on a snapshot-in-time “visual inspection” by persons without facilities expertise. (DGS OPSC 4.) It is not addressed to the age, underlying characteristics, “[service life expectancies, replacement needs, or preventive maintenance](#)” of buildings and building systems, subsystems, and components or to long-term planning around them. Indeed, by the express terms of § 17002(d)(1), the FIT may “not require capital enhancements beyond the standards to which the facility was designed and constructed.”

ATTACHMENT B

In contrast, facilities master planning should involve a proactive and long-term focus, include input from facilities specialists as well as various non-specialist school stakeholders, and address any capital enhancements that may be needed to support educational goals as well as basic safety, health, and learning.

Further, the California State Auditor in late 2024 [identified and made recommendations](#) still to be implemented in relation to certain issues with the format of the FIT and deficiencies around its use by school districts and county offices of education (1-2).

Thus, information about recent scores on the FIT—at least as that tool currently exists—should not be the sole or primary input for the narrative required by § 17070.54(c)(8).

Instead, consistent with the spirit of *Williams*, the overall goals of the LCFF/LCAP, and the rightful educational context of school facilities master planning, the narrative required by Education Code § 17070.54(c)(8) should address how the FMP:

- promotes access to basic conditions of learning for all students;
- supports and is in strategic resource alignment with the school district's educational program and state-level priorities;
- reflects meaningful engagement with various stakeholders across the school district community; and
- advances accountability and compliance.

These components are consistent with those that CDE has laid out in [existing facilities master planning guidance](#) (Appendix 1).

2. A Different *Williams*-Related Instrument Offers a Potential Model for Facility Systems, Subsystems, and Components Data that Should Be Collected as Part of the Inventory Required by Education Code § 17070.54(c)(1).

The lack of consistent and centralized data around various aspects of California school facilities has been a recurrent concern expressed by a number of [different stakeholders](#), who have [pointed out](#) that its absence makes it difficult to “spend adequately or efficiently and target places where facility need is greatest” (32). The California State Auditor’s 2022 report “[School Facilities Program: California Needs Additional Funding and a More Equitable Approach for Modernizing Its School Facilities](#)” also identified the lack of a current “comprehensive set of data” as a problem in this respect (12-13, 19). As the report noted, the last attempt to collect such a set of data took place in the mid-2000s as part of the *Williams* settlement (12). That initiative was the School Facility Needs Assessment Grant Program (SFNAGP).

To implement the SFNAGP needs assessment mandated by Education Code § 17592.70, OPSC [developed forms](#), including the web-based Form SAB 61-01, as well

ATTACHMENT B

as a related “Needs Assessment Report Worksheet.” School districts that participated could use the data collected to identify necessary repairs so as to seek reimbursement (and later grant funding) through the Emergency Repair Program (ERP) created by the *Williams* settlement alongside the SFNAGP. (Ed Code § 17592.71 et seq.) They also were required to use the SFNAGP needs assessment as the baseline for the ongoing “facilities inspection system” that the *Williams* settlement made a condition of eligibility for the School Facility Program (SFP). (Ed Code §§ 17070.75(f), 17592.70(d)(3).)

Education Code § 17070.54(c) requires that a “school facilities master plan shall include, but is not limited to, all of the following information: (1) An inventory of existing facilities, sites, and property pursuant to subdivision (d).”

Section 17070.54(d) states:

The department, in consultation with the State Department of Education, shall develop guidelines that school districts may use to guide the development of the school facilities master plan required as a condition of participating in the school facilities program. The department, in consultation with the State Department of Education, shall develop guidelines or standards that school districts shall use to develop and submit the inventory required pursuant to paragraph (1) of subdivision (c) for every school in the school district, including, but not limited to, all of the following:

- (1) The year each building at the school that is currently used for instructional purposes was constructed.
- (2) The square footage of each building that is currently used for instructional purposes.
- (3) The year, if any, each building that is currently used for instructional purposes was last modernized.
- (4) The pupil capacity of the school.
- (5) The age and number of portable buildings at the school.
- (6) Whether the school has any of the following:
 - (A) A cafeteria or multipurpose room.
 - (B) A library.
 - (C) A gymnasium.

By express statutory terms, the list in § 17070.54(d) is not exhaustive, “including, but not limited to” the enumerated components.

The staff analysis/discussion in Attachment A7 suggests that the enumerated inventory components are “substantially similar to the information that is submitted” in Forms SAB 50-03 and SAB 50-02 (18).

But missing from the list and Forms SAB 50-02 and SAB 50-03 are building systems, subsystems, or components. Nor will an inventory of these necessarily be included in

ATTACHMENT B

deferred maintenance plans certified pursuant to § 17070.75 in relation to routine restricted maintenance accounts (RRMAs), as a number of school districts appear to simply generate a summary along the lines of former Form SAB 40-20. (See Ed Code § 17070.54(c)(7).)

According to [existing CDE guidance on facilities master planning](#), an FMP should assess the “condition and adequacy of existing facilities” and identify “needed improvements and their implementation costs” (2).

To aid in comprehensive strategic planning and resource alignment at the local level, and in service of a comprehensive set of state-level data, school districts should be required to include in the “inventory of existing facilities, sites, and property” in their FMPs some form of standardized assessment of building systems, subsystems, and components in existing facilities and needed improvements and costs.

For the reasons discussed in the previous section, the FIT is not well suited to this purpose. However, the SFNAGP Needs Assessment Worksheet, a copy of which is attached to this letter, does offer a potential model—especially in Parts III and V. Further, requiring data that at least overlaps with that collected through the SFNAGP would allow for potentially useful historical comparison given that more than 2,000 schools submitted needs assessment data through that program.

In any event, some form of standardized assessment of the condition, adequacy, and necessary repairs/improvements of building systems, subsystems, or components should be required as part of the “inventory of existing facilities, sites, and property” that school districts must include in FMPs pursuant to Education Code § 17070.54(d).

Clean Air Allies thanks OPSC for its attention to these comments. Please don't hesitate to reach out with any questions to cleanairalliesorg@gmail.com or (415) 516-9293.

Very truly yours,



JuNelle Harris
Co-Founder
Clean Air Allies/California Alliance for Clean Air in Schools

attachment

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

Page 1 of 9

LOCAL EDUCATIONAL AGENCY

SCHOOL NAME

GENERAL INFORMATION

This worksheet was designed to assist Local Educational Agencies (LEAs) in preparing a Needs Assessment Report (Form SAB 61-01). The worksheet provides information on the data to be gathered to successfully complete a Web-Based Needs Assessment Report. It is recommended that the inspectors use the Worksheet as they perform the on-site review of the school facility. Qualified inspectors must be hired by the LEA to complete Parts III, IV and V of the Needs Assessment Report.

The assessment, which must be submitted electronically to the OPSC, must be accompanied by a hard copy submittal of the certification page along with a site diagram of the school which must identify all buildings on the site. In addition, for Special Education programs operated in multiple locations under a single County-District-School (CDS) code, the LEA must provide a summary of all buildings identified

in the assessment with a corresponding address of the physical location of the buildings as well as the CDS codes of the school sites on which the Special Education buildings are located, if applicable. The LEA must complete all the submittals by January 1, 2006.

In order to access the Web-Based Needs Assessment Report for any eligible school under its jurisdiction, the LEA must first complete and submit electronically the Certification of Eligibility, available at the OPSC's Web site at www.opsc.dgs.ca.gov.

For more information on the School Facility Needs Assessment Grant Program, including qualifications of the inspectors and submittal deadlines, refer to Regulation Sections 1859.302 through 1859.319.

SPECIFIC INSTRUCTIONS

Part I. Information

Gather the following information:

► Physical School Address:

For Special Education programs operated in multiple locations under a single County-District-School (CDS) code, indicate "multiple locations" in lieu of a physical site address.

► Site Ownership:

Indicate whether the site is owned or leased by the Local Educational Agency (LEA).

► Existing Site Size (useable acres):

Useable Acres is the gross acreage of a school site less any portion of the site publicly dedicated for off-site street improvements and any portion of the site not available for school purposes as determined by the California Department of Education because of topological impediments or because of other unique circumstances.

► Does the School Operate on MTYRE Schedule? Yes No

If "Yes", indicate the type of MTYRE Operating Schedule:

Select one of the following: 60/20, 60/15, Orchard, 90/30, 45/15, Concept 6, Modified Concept 6, and Custom type.

► Lunch Facility(ies) on Site:

Indicate the type of facility used for pupil dining which is not designated for classroom instruction. Select one or more of the following: Lunch Shelter, Multipurpose Room, Cafeteria, Gymnasium, Auditorium. Indicate "none" if there is no lunch facility at the school.

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

Page 2 of 9

LOCAL EDUCATIONAL AGENCY

SCHOOL NAME

► Indicate the name and contact information for each person that participated in the completion of the assessment:

NAME		JOB TITLE
REPRESENTATIVE OF		AREA OF EXPERTISE
MAILING ADDRESS		
TELEPHONE NUMBER	FAX NUMBER	E-MAIL ADDRESS

NAME		JOB TITLE
REPRESENTATIVE OF		AREA OF EXPERTISE
MAILING ADDRESS		
TELEPHONE NUMBER	FAX NUMBER	E-MAIL ADDRESS

NAME		JOB TITLE
REPRESENTATIVE OF		AREA OF EXPERTISE
MAILING ADDRESS		
TELEPHONE NUMBER	FAX NUMBER	E-MAIL ADDRESS

NAME		JOB TITLE
REPRESENTATIVE OF		AREA OF EXPERTISE
MAILING ADDRESS		
TELEPHONE NUMBER	FAX NUMBER	E-MAIL ADDRESS

Use additional sheets if necessary.

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Part II. Facility Inventory. Complete One Sheet for Each Building on the School Site.

► Include all buildings that house pupils and staff as part of the regular school curriculum.

Building ID	Enter the building identification number/letter as indicated on the site map to be submitted to the OPSC with the certification page of the Needs Assessment Report. The building ID must be unique and cannot be used to identify another building on the same site.															
Leased/Owned	Indicate whether the building is owned or leased by the LEA.															
Construction Type	Indicate whether the building is of permanent or portable construction. For a definition of portable classroom please refer to Education Code Section 17070.15(j).															
Square Footage	Indicate the total enclosed square footage of the building. For multilevel buildings, report the sum of the square footage at each level.															
Year Constructed	Enter the year of original construction. For purposes of this program, the year of construction shall be considered the date the Notice of Completion was filed with the county recorder, if available. If the date of the Notice of Completion is not available, the LEA may use the year of occupancy as evidenced by historical record.															
Year Modernized	Enter the year of the last building modernization project, excluding any routine and deferred maintenance regardless of the modernization project funding source. For purposes of the assessment, modernization means major improvements made to extend the useful life of, or to enhance the physical environment of the building.															
State-Funded Project	Check "yes" or "no" to indicate whether the modernization project was funded with State bond funds (partially or entirely), under the provisions of the Lease-Purchase Program (Leroy F. Greene State School Building Lease-Purchase Law of 1976) or School Facility Program (Leroy F. Greene School Facilities Act of 1998).	<input type="checkbox"/> Yes <input type="checkbox"/> No														
Facility Type	Select the type(s) of facilities housed in the building.	<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Classrooms</td> <td><input type="checkbox"/> Kitchen</td> </tr> <tr> <td><input type="checkbox"/> Library</td> <td><input type="checkbox"/> Administration</td> </tr> <tr> <td><input type="checkbox"/> Multipurpose Room</td> <td><input type="checkbox"/> Nurse's Office</td> </tr> <tr> <td><input type="checkbox"/> Gymnasium</td> <td><input type="checkbox"/> Toilet Facilities</td> </tr> <tr> <td><input type="checkbox"/> Auditorium</td> <td><input type="checkbox"/> Counseling</td> </tr> <tr> <td><input type="checkbox"/> Theater/Performing Arts</td> <td><input type="checkbox"/> Other</td> </tr> <tr> <td><input type="checkbox"/> Cafeteria</td> <td></td> </tr> </table>	<input type="checkbox"/> Classrooms	<input type="checkbox"/> Kitchen	<input type="checkbox"/> Library	<input type="checkbox"/> Administration	<input type="checkbox"/> Multipurpose Room	<input type="checkbox"/> Nurse's Office	<input type="checkbox"/> Gymnasium	<input type="checkbox"/> Toilet Facilities	<input type="checkbox"/> Auditorium	<input type="checkbox"/> Counseling	<input type="checkbox"/> Theater/Performing Arts	<input type="checkbox"/> Other	<input type="checkbox"/> Cafeteria	
<input type="checkbox"/> Classrooms	<input type="checkbox"/> Kitchen															
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<input type="checkbox"/> Multipurpose Room	<input type="checkbox"/> Nurse's Office															
<input type="checkbox"/> Gymnasium	<input type="checkbox"/> Toilet Facilities															
<input type="checkbox"/> Auditorium	<input type="checkbox"/> Counseling															
<input type="checkbox"/> Theater/Performing Arts	<input type="checkbox"/> Other															
<input type="checkbox"/> Cafeteria																
Number of Classrooms	Report the number of classrooms in the building by grade level. For purposes of the assessment, classroom means a teaching station currently used as an area in which to provide pupil instruction including, but not limited to, standard classrooms, industrial arts/art rooms, business educational labs, science labs, homemaking labs, special education classrooms, and music classrooms.	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">K-6:</td> <td style="border-bottom: 1px solid black; width: 40%;"></td> </tr> <tr> <td>7-8:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td>9-12:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td>Non-Severe SDC:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td>Severe SDC:</td> <td style="border-bottom: 1px solid black;"></td> </tr> </table>	K-6:		7-8:		9-12:		Non-Severe SDC:		Severe SDC:					
K-6:																
7-8:																
9-12:																
Non-Severe SDC:																
Severe SDC:																

Print as many sheets as necessary for the number of buildings on the school site.

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Part III. Useful Life of Major Building Systems

► Use this section to identify useful life remaining of all major building systems on the school site. *For systems unique to a particular building, enter the building ID and complete a separate sheet.* Identify more than one building if necessary for systems that are present throughout multiple buildings on campus. Identify "campus-wide" in lieu of a particular building to evaluate systems that encompass the entire campus, such as a sewer system. Use zero as the remaining useful life for a component that is at the end or past its expected useful life.

Building Identification: _____

BUILDING SYSTEM	SUB-SYSTEM	ELEMENTS/MATERIALS	CHECK IF APPLICABLE	USEFUL LIFE REMAINING	
Structural	Foundation	Concrete	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Wall Framing	Wood	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Floor Framing	Wood	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Roof Framing	Wood	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Roofing	Roofing	Built-Up Roofing	<input type="checkbox"/>	
			Roll Roofing	<input type="checkbox"/>	
Single-Ply Roofing			<input type="checkbox"/>		
Elastomeric Roofing			<input type="checkbox"/>		
Composition Shingles Roofing			<input type="checkbox"/>		
Sheet Metal Roofing			<input type="checkbox"/>		
Foam Roofing			<input type="checkbox"/>		
Tile Roofing			<input type="checkbox"/>		
Other			<input type="checkbox"/>		
Flashing and Sheet Metal			Gutters	<input type="checkbox"/>	
		Downspouts	<input type="checkbox"/>		
		Expansion Joints	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Building Identification: _____

BUILDING SYSTEM	SUB-SYSTEM	ELEMENTS/MATERIALS	CHECK IF APPLICABLE	USEFUL LIFE REMAINING	
Exterior Envelope	Siding	Plywood Siding	<input type="checkbox"/>		
		Hardboard Siding	<input type="checkbox"/>		
		Wood Board Siding	<input type="checkbox"/>		
		Lath and Plaster	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Exterior Doors	Doors	<input type="checkbox"/>		
		Frames	<input type="checkbox"/>		
		Hardware	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Windows	Frames	<input type="checkbox"/>		
		Glass and Glazing	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Soffits and Overhangs			<input type="checkbox"/>	
	Interior Systems	Wall Finishes	Painted Gypsum Wallboard	<input type="checkbox"/>	
			Ceramic Tile	<input type="checkbox"/>	
Paneling			<input type="checkbox"/>		
Tackable Wall Panels			<input type="checkbox"/>		
Other			<input type="checkbox"/>		
Flooring		Carpet	<input type="checkbox"/>		
		VCT	<input type="checkbox"/>		
		Sheet Vinyl	<input type="checkbox"/>		
		Wood	<input type="checkbox"/>		
		Tile	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
Ceilings		Lay-In Acoustical Tile	<input type="checkbox"/>		
		Glue-On Acoustical	<input type="checkbox"/>		
		Painted Gypsum Wallboard	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
Interior Doors		Doors	<input type="checkbox"/>		
		Frames	<input type="checkbox"/>		
		Hardware	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Building Identification: _____

BUILDING SYSTEM	SUB-SYSTEM	ELEMENTS/MATERIALS	CHECK IF APPLICABLE	USEFUL LIFE REMAINING	
Plumbing	Plumbing Fixtures		<input type="checkbox"/>		
	Water Piping	Galvanized Steel Pipe	<input type="checkbox"/>		
		Copper Pipe	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Waste Piping	Cast Iron	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Water Heater	Gas-Fired Water Heater	<input type="checkbox"/>		
		Electric Water Heater	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Gas Piping	Black Steel	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
	Electrical Equipment	Lighting	Fixtures	<input type="checkbox"/>	
			Flood Lighting	<input type="checkbox"/>	
Other			<input type="checkbox"/>		
Power		Switchboards	<input type="checkbox"/>		
		Panel and Breakers	<input type="checkbox"/>		
		Bus Duct	<input type="checkbox"/>		
		Capacitor	<input type="checkbox"/>		
		Switch Units	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		
		Building Transformer	Dry Type	<input type="checkbox"/>	
Other			<input type="checkbox"/>		
Low-Voltage Systems		Telephone	<input type="checkbox"/>		
		Data	<input type="checkbox"/>		
		CCTV	<input type="checkbox"/>		
		Public Address System	<input type="checkbox"/>		
		Security Alarm	<input type="checkbox"/>		
		Other	<input type="checkbox"/>		

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Building Identification: _____

BUILDING SYSTEM	SUB-SYSTEM	ELEMENTS/MATERIALS	CHECK IF APPLICABLE	USEFUL LIFE REMAINING
Mechanical	Heating Ventilation and Air Conditioning (HVAC)	Central Type (Central Boiler – Hydronic Heating/Cooling Tower)	<input type="checkbox"/>	
		Central Type (Central Boiler – Hydronic Heating/DX Cool)	<input type="checkbox"/>	
		Multi Zone Package Roof-Top Unit (Gas Heat/DX Cool)	<input type="checkbox"/>	
		Multi Zone Package Roof-Top Unit (Electric Heat/DX Cool)	<input type="checkbox"/>	
		Single Zone Package Roof-Top Unit (Gas Heat/DX Cool)	<input type="checkbox"/>	
		Single Zone Package Roof-Top Unit (Electric Heat/DX Cool)	<input type="checkbox"/>	
		Single Zone Package Heat Pump Roof-Top Unit (Electric Heat/Electric Cool)	<input type="checkbox"/>	
		Split System (Furnace Heat/Condensing Unit Cool)	<input type="checkbox"/>	
		Wall Mounted Heat Pump (Electric Heat/Electric Cool)	<input type="checkbox"/>	
		Other	<input type="checkbox"/>	
	Heating and Ventilation (HV)	Central Boiler Hydronic Heating with Unit Heaters	<input type="checkbox"/>	
		Central Boiler Hydronic Heating with Radiant Under-Floor Piping	<input type="checkbox"/>	
		Furnace (Gas-Fired)	<input type="checkbox"/>	
		Unit Heaters – Electrical	<input type="checkbox"/>	
		Unit Heaters – Gas	<input type="checkbox"/>	
		Other	<input type="checkbox"/>	
	Ventilation and Exhaust System	Exhaust Fans	<input type="checkbox"/>	
		Kitchen Hood and Exhaust Systems	<input type="checkbox"/>	
		Other	<input type="checkbox"/>	
	Conveying Systems	Elevators	<input type="checkbox"/>	
		Chair Lifts	<input type="checkbox"/>	
Other		<input type="checkbox"/>		
Fire and Life Safety	Automatic Fire Sprinkler Systems	Wet Type	<input type="checkbox"/>	
		Dry Type	<input type="checkbox"/>	
		Other	<input type="checkbox"/>	
		None	<input type="checkbox"/>	
	Fire Pumps	Diesel Generator	<input type="checkbox"/>	
		Other	<input type="checkbox"/>	
	Fire Alarm System	Manual	<input type="checkbox"/>	
		Automatic	<input type="checkbox"/>	
		None	<input type="checkbox"/>	

Use additional sheets as necessary.

ATTACHMENT B

OFFICE OF PUBLIC SCHOOL CONSTRUCTION

NEEDS ASSESSMENT REPORT WORKSHEET

SCHOOL FACILITIES NEEDS ASSESSMENT GRANT PROGRAM

LOCAL EDUCATIONAL AGENCY	SCHOOL NAME
--------------------------	-------------

Part IV. Five-Year Costs to Maintain Functionality

- ▶ Complete this section by estimating costs for each of the five years to maintain functionality of each building to provide a healthy, safe, and suitable learning environment. *Complete a separate sheet for each building identified in Part II.* Use a separate sheet and identify "campus-wide" in lieu of a particular building to estimate maintenance costs for a particular building component that is located throughout the entire campus.

For purposes of this section, accessibility includes any needed work to provide for proper accessibility to all instructional spaces including paving and other maintenance of all areas immediately surrounding the building entrance.

Building Identification: _____

BUILDING COMPONENT	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Roofing					
Framing					
Flooring					
Siding					
Windows					
Doors					
Painting					
Potable/Drinking Water					
Sewer					
Gas					
Lighting					
Electrical Power					
HVAC/HV					
Fire and Life Safety					
Security					
Accessibility					
Playground and Field Areas					
Other					

Print as many sheets as necessary for the number of buildings on the school site.

ATTACHMENT B

Fresno County Office of Education Questions – 5 Year Master Plan

Master Plans

1. Will OPSC be providing some kind of financial assistance to small school Districts to be able to go to an architect and get the facility master plan created?
2. Will the master plan be more basic? If we are able to show that we put work into it and compiled the necessary documents, will that be sufficient as it was in the past? Or will it be stricter and have more specific requirements for how it is organized and put together?
3. Because there are 5 years of district information required, who will be watching for when it is submitted? Will OPSC be reaching out to tell the district when they should start it and how current does the information have to be? If the application was submitted in the past, when does the 5 years actually start?
4. Is there a template for a facility master plan yet?
5. How will COE owned SDC classrooms on district campuses be handled when creating the facility master plan?