

OFFICE OF PUBLIC SCHOOL CONSTRUCTION  
STAKEHOLDER MEETING  
September 18, 2025

IMPLEMENTATION OF PROPOSITION 2 FOR THE SCHOOL FACILITY PROGRAM,  
CALIFORNIA DEPARTMENT OF EDUCATION'S PRIORITY SCHOOL DISTRICT  
PROGRAM REGULATIONS,  
AND  
EVALUATION OF TRANSITIONAL KINDERGARTEN PUPILS IN SCHOOL FACILITY  
PROGRAM ENROLLMENT PROJECTIONS

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). Separate from Proposition 2 implementation, this meeting will also continue discussion of the Evaluation of Transitional Kindergarten (TK) Pupils in School Facility Program (SFP) Enrollment Projections.

*Proposition 2 Implementation*

The Office of Public School Construction (OPSC) is presenting proposed regulations and addressing feedback received for the Small School District Program (Attachment A8) item previously presented at the February 13, April 17, and June 26, 2025 stakeholder meetings.

Additionally, the California Department of Education (CDE) is presenting proposed regulations for the Priority School District Program (Attachment B). CDE introduced regulatory concepts in a public stakeholder meeting in collaboration with OPSC on April 17, 2025. Based upon stakeholder input, CDE has developed proposed regulations.

*Non-Proposition 2 Topic*

Separate from Proposition 2, OPSC is continuing discussion on the Evaluation of TK Pupils in SFP Enrollment Projections (Attachment C1), previously introduced at the February 20, 2025 stakeholder meeting.

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 requests stakeholder feedback regarding these changes for purposes of the Small School District Program.

*Priority School District Program*

Proposition 2 provided \$5 million to CDE to augment the federal Supporting America's School Infrastructure (SASI) Grant Program and provide technical and administrative support regarding school facility maintenance and construction for

## BACKGROUND (cont.)

Priority School Districts. CDE requests stakeholder feedback regarding proposed regulations related to the state augmentation of the SASI grant.

### *Note on Proposed Regulation and Form Changes*

This stakeholder item makes proposed changes to the regulations and forms in effect as of June 20, 2025. This item does not reflect the emergency regulatory amendments and corrections that were approved by the State Allocation Board (Board) on June 25 and August 19, 2025, respectively, which went into effect on September 8, 2025. This item also does not reflect Board-approved proposed regulation and form changes that are pending in the rulemaking process and have not gone into effect. Future stakeholder meeting items and Board agenda items will reflect proposed regulation and form changes once they go into effect.

## AUTHORITY

See Attachments A8a, B, and C1a.

## SUMMARY AND NEXT STEPS

### **Small School District Program and TK Pupils in SFP Enrollment Projections**

For the Small School District Program item, stakeholder feedback received from the last meeting may be found on Attachment D.

For the Evaluation of TK Pupils in SFP Enrollment Projections item, stakeholder feedback received from the last meeting may be found on Attachment E.

Staff will review any feedback obtained in today's meeting and anything received through close of business on Friday, October 3, 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](mailto:OPSCCommunications@dgs.ca.gov).

### **CDE Priority School District Program**

To submit written feedback after today's meeting, specific to the proposed regulatory concepts related to the Priority School District Program, please email your suggestions to the CDE School Facilities and Transportation Services Division at [spsd@cde.ca.gov](mailto:spsd@cde.ca.gov). CDE Staff will review any feedback obtained in today's meeting and anything received through close of business on Friday, September 26, 2025.

## ATTACHMENT A8

### OFFICE OF PUBLIC SCHOOL CONSTRUCTION STAKEHOLDER MEETING September 18, 2025

#### PROPOSED AMENDMENTS TO THE SCHOOL FACILITY PROGRAM FOR THE CREATION OF A SMALL SCHOOL DISTRICT PROGRAM

##### PURPOSE

To continue to discuss and receive stakeholder feedback regarding proposed implementation plans for the new Small School District Program (Program) within the School Facility Program (SFP). This new Program was authorized by 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 A8a.

##### DESCRIPTION

This report continues discussion of the implementation plans for the new Program. Prior stakeholder meetings for this topic were held on February 13, April 17, and June 26, 2025. This report addresses feedback that was not answered at the June 26, 2025 meeting, provides revisions to the proposed regulations and presents the proposed *Application For Small School District Program Preliminary Apportionment* (Form SAB 50-12).

Attachment A8b includes the revised proposed regulations. Attachment A8c includes the proposed Form SAB 50-12.

##### BACKGROUND

###### *Stakeholder Feedback*

On February 13, April 17, and June 26, 2025, the Office of Public School Construction (OPSC) held public meetings to discuss proposed criteria for the new Program. OPSC seeks stakeholder input on any topics presented in this item.

The full text of the prior stakeholder meeting items can be found at the links below:

[February 13, 2025 OPSC Proposition 2 Stakeholder Meeting #2 - Item](#)

[April 17, 2025 OPSC Proposition 2 Stakeholder Meeting #9 - Item](#)

[June 26, 2025 OPSC Proposition 2 Stakeholder Meeting #12 - Item](#)

## BACKGROUND (cont.)

The recordings from the stakeholder meetings are available at the links below:

[February 13, 2025 OPSC Proposition 2 Stakeholder Meeting #2 - Recording](#)

[April 17, 2025 OPSC Proposition 2 Stakeholder Meeting #9 - Recording](#)

[June 26, 2025 OPSC Proposition 2 Stakeholder Meeting #12 - Recording](#)

## STAFF ANALYSIS/DISCUSSION

This report addresses feedback that was not answered at the June 26, 2025 meeting. Additionally, OPSC is providing revisions to the proposed regulations for this new Program and presenting the proposed Form SAB 50-12. Staff would like to thank stakeholders who were able to view, attend, or participate in these meetings and provide valuable feedback either during the meetings or through written correspondence to OPSC.

### **Summary of Stakeholder Feedback**

OPSC received multiple comments regarding the previously proposed 180- and 45-day application periods, which specified when certain applications would be accepted. After careful consideration of all stakeholder feedback and the intent of the Proposition 2 provisions for Small School Districts, OPSC has removed these proposals. The proposed regulations now state that the Program will be open to all eligible Small School Districts as of November 2, 2026, assuming the regulations are in effect. Below is a summary of all other stakeholder feedback that was received following the June 26, 2025 meeting and OPSC's responses.

The full text of stakeholder feedback may be found on Attachment D, except as noted below.

<b>Stakeholder Feedback</b>	<b>OPSC Response</b>
1. A stakeholder inquired during the June 26, 2025 stakeholder meeting on this topic regarding the dollar amount for applications that are currently on the Workload List or ARBBA List for Small School Districts.	1. As of August 31, 2025, there are 71 New Construction applications from Small School Districts requesting a total of approximately \$157.2 million in State funding (excluding duplicate applications and COE requests) on the OPSC Workload List.  As of August 31, 2025, there are 77 Modernization applications from Small School Districts requesting a total of approximately \$138.1 million in State funding (excluding duplicate applications and COE requests) on the OPSC Workload List.



STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p><b>1. (cont.)</b></p>	<p><b>1. (cont.)</b> As of August 31, 2025, there are 72 Modernization funding applications from Small School Districts requesting a total of approximately \$77.4 million in State funding (excluding duplicate applications and COE requests) on the ARBBA List.</p>
<p><b>2.</b> A stakeholder recommended that OPSC allow districts to utilize their New Construction Eligibility that is already on file, but has not yet been processed by OPSC, for the purpose of processing the Form SAB 50-12 for a Preliminary Small School District Program Apportionment.</p> <p>The stakeholder provided the following as an example:</p> <p>If a Small School District's Form SAB 50-12 is being processed in the 2025-2026 enrollment year and has an unprocessed New Construction Eligibility update from the 2023-2024 enrollment year, the Small School District should be allowed to use eligibility from either year, consistent with current SFP practices. This continued practice would align the five-year eligibility lock with the five-year window required to obtain Division of the State Architect (DSA) and California Department of Education (CDE) approvals.</p>	<p><b>2.</b> If a Small School District would like to use the current State Allocation Board (SAB) Approved New Construction Eligibility under a 3 or 5-year lock, they may remain on the Workload List or Applications Received Beyond Bond Authority (ARBBA) List. Provided the eligibility lock is still valid at the time the application is processed, the project would draw from that eligibility.</p> <p>OPSC proposes that all participants in the Program would be required to update their New Construction Eligibility if a Form SAB 50-12 is submitted to participate in the Program. This ensures that the 5-year projection, and 5-year eligibility lock, are valid during the entire timeframe in which a Small School District can convert their Preliminary Small School District Program Apportionment to a Final Small School District Program Apportionment.</p>
<p><b>3.</b> A stakeholder encouraged OPSC to consider maintaining unfunded Small School District projects on both:</p> <ul style="list-style-type: none"> <li>1. A new list, the Program Workload Beyond Bond Authority List, and</li> <li>2. The existing SFP ARBBA List.</li> </ul>	<p><b>3.</b> At this time, OPSC is not planning to maintain any additional lists beyond the Program Workload List, as the SAB has already taken action to reserve the maximum amount allowed by statute for this Program. However, OPSC notes that Small School Districts can continue to submit Applications for Funding that will be tracked on OPSC's</p>

**STAFF ANALYSIS/DISCUSSION (cont.)**

<b>Stakeholder Feedback</b>	<b>OPSC Response</b>
<p><b>3. (cont.)</b> The stakeholder suggested that each Small School District would retain its place on each list based on the application date applicable to each list (original filing date or date of the Form SAB 50-12 submittal, whichever applies).</p>	<p><b>3. (cont.)</b> existing Workload List and/or ARBBA List, as applicable.</p>
<p><b>4.</b> A stakeholder provided the below enhancement recommendations for OPSC to consider:</p> <p>Continue to streamline application documentation and eligibility updates for Small School Districts.</p> <p>Provide targeted technical assistance funding to help small districts prepare and submit applications.</p> <p>Clarify Project and Construction Management Grant implementation so Small School Districts can effectively utilize these funds for outside expertise.</p>	<p><b>4.</b> OPSC will provide additional outreach to Small School Districts in advance of accepting application submittals for Preliminary Small School District Program Apportionments, including a webinar about the Program once regulations are approved. Following Small School Districts' receipt of a Preliminary Small School District Program Apportionment, OPSC will continue to provide ongoing support for those Small School Districts through conversion to a Final Small School District Program Apportionment. These outreach efforts will include support from OPSC staff with application documentation, eligibility and funding applications, and clarification regarding the Project and Construction Management Grant as it relates to a specific application.</p> <p>OPSC recommends that stakeholders subscribe to our email list to be alerted about the future webinar for this Program and any additional workshops or other resources that may be announced in the future for this Program.</p>

**Summary of Updates to Proposed SFP Regulatory Amendments**

The updated proposed regulations are included as Attachment A8b. In addition to various non-substantive, clarifying updates, OPSC made updates to the proposed SFP regulatory amendments as follows:

STAFF ANALYSIS/DISCUSSION (cont.)

Section 1859.90.2 was updated to clarify that school districts must participate in the Priority Funding Process to be considered for approved advance release of project assistance, the Project and Construction Management Grant, and/or any site acquisition funds from a Preliminary Small School District Program Apportionment.

Section 1859.90.3 was updated to specify that the advance release of design, project assistance, the Project and Construction Management Grant, and any site acquisition funds from a Preliminary Small School District Program Apportionment are excluded from occurrences related to non-participation in the Priority Funding Process.

Section 1859.106(e) was added to the proposed regulations to specify that if a Small School District requests the Project and Construction Management Grant and does not obtain project and/or construction management services described in Education Code (EC) Section 17078.35, the total project cost will be reduced for the Project and Construction Management Grant and associated required matching share.

Section 1859.156 was updated to specify that applications for Preliminary Small School District Program Apportionments will be processed in order of receipt of an Approved Application. Additionally, Section 1859.156 was reorganized with the addition of Sections 1859.156(a) and 1859.156(b) to clearly list the requirements for New Construction Eligibility and Modernization Eligibility separately from one another. New Construction Eligibility Establishment and Adjustments must be submitted with the Form SAB 50-12 using the current enrollment year.

Section 1859.157 is updated to allow all eligible Small School Districts to submit applications for a Preliminary Small School District Program Apportionment beginning on November 2, 2026. This would mean that the initial applications submitted to OPSC beginning November 2, 2026 would establish or update their New Construction Eligibility based on the 2026/2027 enrollment year.

Additionally, Section 1859.157 was updated to state that Program funds are set aside pursuant to EC Sections 101412(a)(1)(A) and 101412(a)(2)(A) and that once these funds are exhausted, the SAB would cease accepting Form SAB 50-12 submittals and return any Form SAB 50-12 submittals that were not approved due to insufficient funds for the Program.

Sections 1859.157.1 and 1859.157.2 were reorganized and updated to more clearly delineate the eligible additional grants that will be provided for New Construction Grant or Modernization grants, respectively. Additionally, these sections were reorganized and updated to specify that the calculation for the Project and Construction Management Grant will be made after the inflator factor is calculated for the Preliminary Small School District Program Apportionment.

STAFF ANALYSIS/DISCUSSION (cont.)

Sections 1859.157.3(a) and 1859.157.3(b) were updated to clarify the amounts for separate advance releases of design funds for applicants eligible for Financial Hardship assistance.

Section 1859.157.4 was updated to remove the previous proposal for Section 1859.157(a) regarding eligibility criteria because New Construction Eligibility and Modernization Eligibility will be established or updated, as applicable, prior to or on the date of the Form SAB 50-12 submittal.

**Summary of Proposed Form SAB 50-12**

OPSC proposes a new form, the Form SAB 50-12, which Small School Districts would submit to be considered for a Preliminary Small School District Program Apportionment. This form is a multiuse form for both New Construction and Modernization funding requests for the Program.

The funds that can be reserved at the Preliminary Small School District Program Apportionment stage include pupil grants, 50 years or older pupil grants, replacement funding for 75 years or older facilities, all New Construction and Modernization funding supplemental grants, including those recently provided as a result of the passage of Proposition 2, the Project and Construction Management Grant, excessive cost hardship grants, and the local funding adjustment grant.

The proposed Form SAB 50-12 can be found in this item as Attachment A8c.

OPSC welcomes any feedback from our stakeholders regarding the updates to the proposed regulations and the proposed Form SAB 50-12.

AUTHORITY**Education Code (EC) Section 17078.35 – Assistance to Small School Districts**

For purposes of this article, the following definitions apply:

- (a) “Final apportionment” has the same meaning as “apportionment” as defined in subdivision (a) of Section 17070.15.
- (b) “Preliminary application” means an application for a preliminary apportionment pursuant to this article.
- (c) “Preliminary apportionment” means a reservation of bond authority for eligible applicants under this article in advance of full compliance with all of the application requirements otherwise required for an apportionment pursuant to this chapter.
- (d) “Project and construction management grant” means a grant for purposes of obtaining the services from a county office of education, other local educational agency with applicable school facilities construction expertise, applicable state department, or a certified private construction consulting entity from the list maintained pursuant to paragraph (2) of subdivision (d) of Section 17078.47, to assist with the planning, site acquisition, preconstruction, construction, and closeout of a project.
- (e) “Small school district” is a school district, as defined in Section 17070.15, with an enrollment of fewer than 2,501 pupils.

**EC Section 17078.36 – Assistance to Small School Districts**

- (a) Unless this article expressly provides otherwise, the provisions contained in the other articles of this chapter shall apply with equal force to a project funded under this article. This article shall control over the provisions of this chapter contained in other articles only to the extent that this article expressly conflicts with those provisions.
- (b) This article shall apply only to a small school district that is otherwise eligible under this chapter for a project that meets both of the following:
  - (1) The project meets the criteria set forth in subdivision (a) of Section 17078.37.
  - (2) The project is to be funded from proceeds of state bonds approved by the voters at the November 5, 2024, statewide general election that shall not exceed the amounts made available pursuant to paragraphs (1) and (2) of subdivision (a) of Section 101412.

AUTHORITY (cont.)**EC Section 17078.37 – Assistance to Small School Districts**

Notwithstanding subdivision (a) of Section 17072.30 and subdivision (a) of Section 17074.16, as applicable:

(a) Applicants for funding pursuant to this article shall do both of the following:

(1) Submit preliminary applications to the board.

(2) Meet the eligibility requirements described in Article 3 (commencing with Section 17071.75) and Article 6 (commencing with Section 17073.10), as applicable.

(b) The board shall do both of the following:

(1) Accept a preliminary application from, and make a preliminary apportionment to, a small school district for new construction grants pursuant to Article 4 (commencing with Section 17072.10) or modernization grants pursuant to Article 7 (commencing with Section 17074.10) in a manner substantially identical to the preliminary apportionment requirements established in Section 17078.24, except that the eligibility of the applicant shall be based on the criteria established in paragraph (2) of subdivision (a).

(2) If requested, provide a preliminary apportionment of a project and construction management grant equal to 5 percent of the state share of the preliminary apportionment.

**EC Section 17078.38 – Assistance to Small School Districts**

The board shall adopt regulations setting forth all of the following:

(a) The preliminary application and preliminary apportionment.

(b) The apportionment of design grants, project assistance grants pursuant to subdivision (e) of Section 17072.10 and subdivision (e) of Section 17074.10, as applicable, and project and construction management grants to applicants that qualify for financial hardship assistance pursuant to Section 17075.15, as part of the preliminary apportionment.

(c) The existence of substantial progress requirements on apportionments for design and site grants identical to the requirements set forth in Section 1859.105 of Title 2 of the California Code of Regulations.

(d) The requirements for a final apportionment for the project in a manner substantially identical to the requirements of subdivisions (a) and (b) of Section 17078.25.

## PROPOSED REGULATIONS

## Section 1859.2. Definitions.

[...]

“Final Small School District Program Apportionment” shall mean a Preliminary Small School District Program Apportionment that has been converted to a Final Small School District Program Apportionment in accordance with Sections 1859.157.4 through 1859.157.7.

[...]

“Form SAB 50-12” means the *Application For Small School District Program Preliminary Apportionment*, Form SAB 50-12 (New [insert the approval date by OAL]), which is incorporated by reference.

[...]

“Preliminary Small School District Program Apportionment” means a reservation of bond authority for eligible applicants under Article 11.5 of Chapter 12.5 of the Education Code. The reservation of bond authority is in advance of full compliance with all of the application requirements otherwise required for a Final Small School District Program Apportionment pursuant to Chapter 12.5 of the Education Code.

[...]

“Project and Construction Management Grant” means a grant for purposes of obtaining the services from a county office of education, other local educational agency with applicable school facilities construction expertise, applicable state department, or a certified private construction consulting entity from the list maintained pursuant to paragraph (2) of subdivision (d) of Education Code Section 17078.47, to assist with the planning, site acquisition, preconstruction, construction, and closeout of a project.

[...]

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

Reference: Sections 17009.5, 17017.6, 17017.7, 17021, 17047, 17050, 17051, 17070.15, 17070.51(a), 17070.71, 17070.77, 17071.10, 17071.25, 17071.30, 17071.33, 17071.35, 17071.40, 17071.75, 17071.76, 17072.10, 17072.12, 17072.18, 17072.33, 17073.25, 17074.10, 17074.30, 17075.10, 17075.15, 17077.40, 17077.42, 17077.45, 17078.35, 17078.36, 17078.37, 17078.38, 17078.52, 17078.56, 17078.72(k), 17079, 17079.10, 17280, 56026 and 101012(a)(8), Education Code; Section 53311, Government Code; and Sections 1771.3 in effect on January 1, 2012 through June 19, 2014 and 1771.5, Labor Code.



### Section 1859.90.2. Priority Funding Process.

The priority funding process allows the Board to distribute available funds to districts or charter schools that request, pursuant to (a) or (b) below, as applicable, an Apportionment or an advance release of funds from a Preliminary Apportionment, Preliminary Small School District Program Apportionment, or Preliminary Charter School Apportionment, during specific 30-calendar day filing periods beginning with July 27, 2011 and continuing with the 2nd Wednesday of January and the 2nd Wednesday of July of 2012. Requests submitted during the filing periods described above are valid until the next filing period begins. The specific 30-calendar day filing periods subsequent to 2012 begin with January 9, 2013 and continue with the 2nd Wednesday of May and the 2nd Wednesday of November, each calendar year. Requests submitted during the filing period beginning with January 9, 2013 are valid until June 30, 2013. Requests submitted during a filing period beginning with the 2nd Wednesday of May are valid from July 1 until December 31 of that year. Requests submitted during a filing period beginning with the 2nd Wednesday in November are valid from January 1 until June 30 of the following year. Requests must be physically received by the OPSC by the 30th calendar day of each filing period to be considered valid.

(a) In order to be considered for an Apportionment; approved advance release of design, project assistance, the Project and Construction Management Grant, and/or any site acquisition funds from a Preliminary Small School District Program Apportionment; approved advance release of design funds from a Preliminary Charter School Apportionment; or approved advance release of environmental hardship site acquisition funds from a Preliminary Apportionment, the district or charter school must provide a priority funding request in the form of a written statement signed by an authorized representative that includes each of the project Application numbers, and the type of Apportionment request (e.g., Apportionment, separate Apportionment for design or site acquisition), within the 30-calendar day filing period, and shall contain the following:

[...]

Note: Authority cited: Section 17070.35, Education Code.

Reference: Sections 17072.12, 17072.30, 17074.16, 17076.10, 17077.40, 17077.42 ~~and~~, 17077.45, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

### Section 1859.90.3. Participation in the Priority Funding Process.

This section applies to Applications for funding for new construction, modernization, Overcrowding Relief Grant, Career Technical Education Facilities Program, Facility Hardship pursuant to Section 1859.82 and rehabilitation pursuant to Section 1859.83(e), ~~and Charter School Facilities Program, and Small School District Program~~, excluding advance release of design and/or site acquisition funds from a Preliminary Charter

School Apportionment, and excluding advance release of design, project assistance, the Project and Construction Management Grant, and any site acquisition funds from a Preliminary Small School District Program Apportionment.

(a) For each Application on the Unfunded List (Lack of AB 55 Loans) for new construction, modernization, Facility Hardship pursuant to Section 1859.82 or rehabilitation pursuant to Section 1859.83(e), the occurrences of (1) or (2) below shall be limited after the effective date of this regulation section [March 25, 2013]. For each Application on the Unfunded List (Lack of AB 55 Loans) for Overcrowding Relief Grant, Career Technical Education Facilities Program, Small School District Program, and Charter School Facilities Program, excluding advance release of design, project assistance, the Project and Construction Management Grant, and any site acquisition funds from a Preliminary Small School District Program Apportionment; or an advance release of design and/or site acquisition funds from a Preliminary Charter School Apportionment, the occurrences of (1) or (2) below shall be limited after the effective date of this regulation section [October 1, 2014]:

[...]

Note: Authority cited: Section 17070.35, Education Code.

Reference: Sections 17072.12, 17072.30, 17074.16 and 17076.10, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.106. Program Accountability Expenditure Audit.

[...]

An adjustment in the SFP grant will be made for the following:

(a) The difference in the value of the site, relocation costs, DTSC fees, and hazardous waste/materials removal costs that were used to determine the New Construction Additional Grant and the actual amount paid by the district for the site, relocation costs, DTSC fees, and hazardous waste/materials removal costs. For applications received on or after January 1, 2004, the adjustment may be made regardless of whether the hazardous waste/materials removal costs were requested on the application for funding.

(b) For any insurance proceeds collectable by the district for displaced facilities and net proceeds available from the disposition of displaced facilities pursuant to Sections 1859.82.1(d) and 1859.82.2(d).

(c) For any project that received funding pursuant to 1859.71.4(c) or 1859.78.1(b), 50 percent of one-fourth of one percent of the difference between the original Total Projected Bond Apportionment and the newly calculated amount.

(d) Any adjustments made pursuant to this Section will be made only if sufficient bond authority is available for the adjustment. If an Unfunded List has been created by the Board, then any adjustments made pursuant to this Section will be placed on the Unfunded List.

(e) The total project cost will be reduced for the Project and Construction Management Grant, and associated required matching share, for the Project and Construction Management Grant provided pursuant to 1859.157.1 or 1859.157.2 if the Small School District does not obtain project and/or construction management services from a county office of education, other local educational agency with applicable school facilities construction expertise, applicable state department, or a certified private construction consulting entity and/or does not expend any funds on these services.

[...]

Note: Authority cited: Section 17070.35, Education Code.

Reference: Sections 17070.35, 17076.10 and 17078.52, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

### Article 13.5. Small School District Program

#### Section 1859.156. General.

A Small School District seeking a Preliminary Small School District Program Apportionment pursuant to the provisions of Education Code Sections 17078.35 through 17078.38 for New Construction or Modernization funding shall complete and file a Form SAB 50-12. Applications will be processed in order of receipt of an Approved Application.

An applicant shall ensure that it has met the following requirements:

(a) New Construction Eligibility shall be established pursuant to Section 1859.20 or updated pursuant to Section 1859.51, as applicable, using the current enrollment year that corresponds to the date of the Form SAB 50-12 submittal. OPSC shall present the eligibility establishment or update, as applicable, for the SAB's consideration prior to or concurrently with the Preliminary Small School District Program Apportionment.

(b) Modernization Eligibility shall be established pursuant to Section 1859.60 prior to or on the date of the Form SAB 50-12 submittal.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157. Application Process.

The Board shall accept applications for a Preliminary Small School District Program Apportionment beginning on November 2, 2026.

When the Small School District Program funds set aside pursuant to Education Code Sections 101412(a)(1)(A) and 101412(a)(2)(A) are exhausted, the Board shall cease accepting Forms SAB 50-12. Any Form SAB 50-12 not apportioned because insufficient funding is available shall be returned to the applicant.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.1. Preliminary Apportionment Grant Determination for New Construction Applications.

A Preliminary Small School District Program Apportionment for New Construction funding shall be equal to the sum of (a) through (c)(2) below:

(a) A New Construction Grant for all eligible pupils included on the Form SAB 50-12 and New Construction additional grants, as applicable, provided by Section(s) 1859.71.2; 1859.71.3; 1859.72; 1859.73; 1859.73.1; 1859.73.2; 1859.74; 1859.74.2; 1859.74.3; 1859.74.4; 1859.74.5; 1859.75.1; 1859.76; and Sections 1859.86(a), 1859.83(b), 1859.83(c), and 1859.83(d).

(b) For all Preliminary Small School District Program Apportionments, the inflator factor shall be an amount equal to the sum of the amount determined in (a) and multiplied by a factor determined as follows:

(1) Divide the January Class B Construction Cost Index in effect at the time of the Preliminary Small School District Program Apportionment by the January Class B Construction Cost Index in effect four years prior to the Preliminary Small School District Program Apportionment. Round to four decimal places.

(2) Subtract 1 from the quotient in (1). Round to two decimal places.

(c) The Project and Construction Management Grant shall be equal to five percent of the sum of the amounts determined in (a) and (b).

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.2. Preliminary Apportionment Grant Determination for Modernization Applications.

The Preliminary Small School District Program Apportionment for Modernization funding shall be equal to the sum of (a) through (c)(2) below:

(a) A Modernization Grant for all eligible pupils included on the Form SAB 50-12 and Modernization additional grants, as applicable, provided by Section(s) 1859.78.1, 1859.78.2; 1859.78.3; 1859.78.4; 1859.78.5; 1859.78.6; 1859.78.7; 1859.78.10; and Sections 1859.83(a), 1859.83(b), 1859.83(d), and 1859.83(e).

(b) For all Preliminary Small School District Program Apportionments, the inflator factor shall be an amount equal to the sum of the amount determined in (a) and multiplied by a factor determined as follows:

(1) Divide the January Class B Construction Cost Index in effect at the time of the Preliminary Small School District Program Apportionment by the January Class B Construction Cost Index in effect four years prior to the Preliminary Small School District Program Apportionment. Round to four decimal places.

(2) Subtract 1 from the quotient in (1). Round to two decimal places.

(c) The Project and Construction Management Grant shall be equal to five percent of the sum of the amounts determined in (a) and (b).

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.3. Preliminary Small School District Program Apportionment Fund Release.

An applicant who qualifies for Financial Hardship, in accordance with Sections 1859.81 through 1859.81.3, may receive an advance release of funds as follows:

(a) For a New Construction Preliminary Small School District Program Apportionment, a separate advance release of funds for design equal to 40 percent of the sum of the New Construction Grant and the grant amount provided by Section 1859.157.1(c).

(b) For a Modernization Preliminary Small School District Program Apportionment, a separate advance release of funds for design equal to 25 percent of the sum of the Modernization Grant and the grant amount provided by Section 1859.157.2(c).

Subject to the availability of funding to the Board for bond-funded projects, OPSC will release State funds included in a Preliminary Small School District Program Apportionment, pursuant to (a) or (b). State funds released from a Preliminary Small

School District Program Apportionment pursuant to this Section shall be subject to the provisions in Sections 1859.90 and 1859.90.2.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.4. Conversion of Preliminary Small School District Program Apportionment.

When a Preliminary Small School District Program Apportionment is converted to a Final Small School District Program Apportionment, all the following criteria must be met:

(a) An applicant seeking to convert a Preliminary Small School District Program Apportionment to a Final Small School District Program Apportionment shall complete and submit a valid Form SAB 50-04 to request a New Construction Adjusted Grant or a Modernization Adjusted Grant.

(b) The number of pupil grants requested on the Form SAB 50-04 cannot exceed the amount the applicant approved at the Preliminary Small School District Program Apportionment. The pupils requested by the Small School District and approved by the Board shall be for at least 50 percent of the pupils the applicant requested and received on the Preliminary Small School District Program Apportionment for New Construction funding or for at least 60 percent of the pupils the applicant requested and received on the Preliminary Small School District Program Apportionment for Modernization funding.

If an applicant is unable to meet the criteria in this Section, the Preliminary Small School District Program Apportionment shall be rescinded pursuant to the provisions of Section 1859.157.5.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code.

Reference: Section 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.5. Time Limit on Preliminary Small School District Program Apportionment.

(a) A complete request to convert a Preliminary Small School District Program Apportionment to a Final Small School District Program Apportionment pursuant to Section 1859.157.4 shall be made within four years of the date of the Preliminary Small School District Program Apportionment unless the applicant received approval of an extension pursuant to Section 1859.157.6.

(b) If (a) is not met, and the applicant has not received an advance release of funds as provided in Section 1859.157.3, the Preliminary Small School District Program Apportionment shall be rescinded and any remaining Preliminary Small School District Program Apportionment, not released to the applicant, shall be returned to the fund source.

(c) If (a) is not met, and the applicant has received an advance release of funds as provided in Section 1859.157.3, the following will occur:

(1) The Preliminary Small School District Program Apportionment shall be rescinded and any remaining Preliminary Small School District Program Apportionment, not released to the applicant, shall be returned to the fund source.

(2) The New Construction Eligibility or Modernization Eligibility will be adjusted by the number of pupil grants not used. The number of pupils returned shall be equal to the number of pupil grants requested on the Form SAB 50-12, less the pupil equivalent to the total amount of state funding retained by the applicant.

(3) Funds released pursuant to Section 1859.157.3(a) or (b) shall be reduced to cost incurred and closed-out pursuant to Section 1859.106 with a corresponding New Construction baseline eligibility adjustment for the pupils assigned to the Preliminary Small School District Program Application. Funds returned pursuant to Section 1859.106 shall be returned to the fund source.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code.

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

#### Section 1859.157.6. Preliminary Small School District Program Apportionment Time Limit Extension.

An applicant that has received a Preliminary Small School District Program Apportionment pursuant to Section 1859.157.1 or 1859.157.2 may request a single one-year extension of the time limit prescribed in Section 1859.157.5. The Board may approve the request provided the criteria in (a) or (b) are met:

(a) The applicant has provided evidence of both of the following:

(1) CDE has made a contingent or final approval for the project or of the proposed site; and,

(2) DSA has confirmed that the final plans for the project have been submitted to the DSA for review and approval.

(b) Other evidence satisfactory to the Board justifying the extension.



A single one-year extension request from an applicant may be approved by the Board after the time limit prescribed in Section 1859.157.5 has elapsed. OPSC must receive the single one-year extension request from the applicant on or prior to the deadline for which the applicant's time limit would elapse.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code.

Reference: Section 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.7. Final Small School District Program Apportionment Grant Determination.

(a) The amount of the Final Small School District Program Apportionment will be based on the provisions of any amended or new regulations that are effective at the time the Form SAB 50-04, for the Final Small School District Program Apportionment is submitted and accepted for processing by OPSC. The Board shall convert the amounts determined below from the Preliminary Small School District Program Apportionment to the Final Small School District Program Apportionment:

(1) If the Final Small School District Program Apportionment request is equal to or less than the Preliminary Small School District Program Apportionment, the Final Small School District Program Apportionment shall be funded entirely. The difference in the Final Small School District Program Apportionment and the Preliminary Small School District Program Apportionment shall be returned to the fund source. The Final Small School District Program Apportionment shall become the full and final Apportionment for the project.

(2) If the Final Small School District Program Apportionment request is greater than the Preliminary Small School District Program Apportionment, the Board shall convert the Preliminary Small School District Program Apportionment to a Final Small School District Program Apportionment by either of the following:

(A) If the balance in the fund source is greater than the difference in the Final Small School District Program Apportionment and the Preliminary Small School District Program Apportionment, fund the Final Small School District Program Apportionment entirely. The Final Small School District Program Apportionment shall become the full and final apportionment for the project.

(B) If the balance in the fund source is less than the difference in the Final Small School District Program Apportionment and the Preliminary Small School District Program Apportionment, fund the Final Small School District Program Apportionment using any remaining balance in the fund source. The Final Small School District Program Apportionment shall become the full and final Apportionment for the project.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code.

Reference: Section 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.157.8. Final Small School District Program Apportionment Fund Release.

Once the Preliminary Small School District Program Apportionment is converted to a Final Small School District Program Apportionment pursuant to Sections 1859.157.4 through 1859.157.7, the applicant may request a release of the remaining funds as prescribed in Section 1859.90 or 1859.90.2.

Note: Authority cited: Sections 17070.35 and 17075.15, Education Code

Reference: Sections 17070.15, 17078.35, 17078.36, 17078.37, and 17078.38, Education Code.

Section 1859.158. Substantial Progress and Expenditure Reporting Timelines.

A Small School District receiving funds in accordance with the Act shall submit the following:

(a) An expenditure report from the Small School District on the Form SAB 50-06. The program reporting requirements are as follows:

(1) The first expenditure report shall be due one year from the date that any funds were released to the Small School District for the project pursuant to Section 1859.90 or 1859.90.2, or upon notice of completion of the project to OPSC, whichever occurs first. A project shall be deemed complete when either of the following occur:

(A) When the notice of completion for the project has been filed with OPSC, all outstanding invoices, claims, and change orders have been satisfied and the facility is currently in use by the Small School District.

(B) Three years from the date of the final fund release for an elementary school project or four years from the date of the final fund release for a middle or high school project.

(2) The second and subsequent expenditure reports, if necessary, shall be due annually beginning one year from the first report, or upon notice of completion of the project to OPSC, whichever occurs first. The final expenditure report must be made no later than three years from the date of the final fund release for an elementary school project or four years from the date of the final fund release for a middle or high school project.

(b) A progress report, in the form of a narrative from the Small School District, shall be due 18 months from the date any funds were released to the Small School District for the project pursuant to Section 1859.90 or 1859.90.2. The progress report shall include information regarding the progress the Small School District has made towards substantial completion of the project. If the notice of completion to OPSC has been filed within 18 months of the release of funds pursuant to Section 1859.90 or 1859.90.2, or

the expenditure reports required in (a)(1) or (2) indicate that substantial progress (as defined in Section 1859.105) on the project has occurred, no progress report is required.

(c) A progress report, in the form of a narrative from the Small School District, shall be due 12 months from the date the site acquisition funds were apportioned to the Small School District for the project pursuant to Section 1859.75.1. The progress report shall include information regarding the progress the Small School District has made towards acquiring the site as outlined in Section 1859.105.1 and may contain other evidence of reasonable effort to substantiate progress towards acquiring the site for purposes of an extension of the site apportionment as authorized by Education Code Section 17072.13(c)(2).

(d) If an Apportionment was made for a Small School District owned site pursuant to Section 1859.74.5, a certification that the non-school function currently taking place on the Small School District owned site has been discontinued or relocated. The certification must be submitted to OPSC no later than the following dates:

(1) If the project is for an elementary school, 66 months from the date of the site Apportionment.

(2) For all other projects, 78 months from the date of the site Apportionment.

Note: Authority cited: Sections 17070.35, 17072.13, 17075.15 and 17079.30, Education Code.

Reference: Sections 17070.15, 17070.35, 17070.99, 17072.12, 17072.13, 17076.10, 17078.35, 17078.36, 17078.37, 17078.38, and 17079.30, Education Code.

**APPLICATION FOR SMALL DISTRICT PROGRAM PRELIMINARY****APPORTIONMENT****SCHOOL FACILITY PROGRAM**

SAB 50-12 (New [insert the approval date by OAL])

**GENERAL INSTRUCTIONS**

This form is used to request a preliminary apportionment for New Construction or Modernization of school facilities for Small School Districts. This apportionment is available only to School Districts (Districts) that meet the definition of a Small School District in Section 1859.2 for New Construction projects. For Modernization projects, this apportionment is available only to Districts that have 2,500 or less pupils in their District on their latest California Basic Education Data System (CBEDS) enrollment reporting. The apportionment will be a reservation of funds for the project to allow time to receive the necessary approvals from other State entities and shall be converted to a Final Small District Program Apportionment based on Sections 1859.157.4 through 1859.157.8.

If not previously submitted, a district may file an application for Modernization funding by use of this form concurrently with a determination of or an adjustment to the District's Modernization eligibility in accordance with Section 1859.60. The district must submit a determination of or an adjustment to the District's New Construction baseline eligibility upon request, in accordance with Regulation Sections 1859.20 or 1859.51, as applicable. The Board will only provide New Construction funding if this form is submitted prior to the date of occupancy of any classrooms included in the construction contract. If the district has a pending reorganization election that will result in the loss of eligibility for the proposed project, the district must submit an adjustment to the District's New Construction baseline eligibility as required in Section 1859.51 upon request. This may be accomplished by completion and submittal of Form SAB 50-01, Form SAB 50-02, and Form SAB 50-03 for the current enrollment year. Failure to submit the requested Forms may result in the Office of Public School Construction (OPSC) returning the funding application to the district unprocessed.

For purposes of Education Code Section 17073.25, the California Department of Education (CDE) is permitted to file Modernization applications on behalf of the California Schools for the Deaf and Blind.

Requests for funding may be made as follows:

1. A Preliminary Small District Program Apportionment for New Construction pursuant to Section 1859.157.1. Districts may apply for a Preliminary Small District Program Apportionment for the design and/or for site acquisition on the same project. For purposes of this apportionment, the following documents must be submitted with this form (as appropriate):
  - Form SAB 50-01, Form SAB 50-02, and Form SAB 50-03 (if not previously submitted).
  - Contingent site approval letter from the CDE or a final site approval letter from the CDE (site apportionment only).
  - Real estate appraisal of property with valuation date within six months of the Form SAB 50-12 submittal, may be preliminary (site apportionment only).
  - Relocation cost estimate (if requested).
  - Department of Toxic Substances Control (DTSC) cost estimate (if requested).
  - Hazardous waste removal cost estimate (if requested).
  - Cost benefit analysis as prescribed in Section 1859.74.6 or a copy of the Board findings that the non-school function on the district-owned site must be

relocated (if applicable).

If the district is requesting a Preliminary Small District Program Apportionment for New Construction funding after the initial baseline eligibility was approved by the Board and the District's current CBEDS enrollment reporting year is later than the enrollment reporting year used to determine the District's baseline eligibility or adjusted eligibility, the district must complete a new Form SAB 50-01 based on the current year CBEDS enrollment data, and submit it to OPSC with this form. The district must also update its eligibility by separation of Special Day Class from regular K-12 grade level pupils by submitting a revised Form SAB 50-02 and Form SAB 50-03, if it has not already done so. In addition, if the District's request is fully or partially based on eligibility derived from an Alternative Enrollment Projection, the district must update the Alternative Enrollment Projection to correspond with the CBEDS enrollment data for the current year. A Small District with 2,500 or less enrollment as defined in Section 1859.2 will not have its eligibility reduced for a period of three years from the date the District's baseline eligibility was approved by the Board as a result of reduction in projected enrollment.

2. A Preliminary Small District Program Apportionment for Modernization pursuant to Section 1859.157.2. For purposes of this apportionment, the Form SAB 50-03 must accompany this form (if not previously submitted).

A complete list of the application submittal guidelines can be found on OPSC's website.

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**SPECIFIC INSTRUCTIONS**

The district must assign a Project Tracking Number (PTN) to this project. The same PTN is used by the OPSC, the Division of the State Architect (DSA) and CDE for all project applications submitted to those agencies to track a particular project through the entire state application review process. If the district has already assigned a PTN to this project by prior submittal of an application to either DSA or CDE for approval, the district must use that PTN for this application submittal. If no PTN has been previously assigned for this project, a PTN may be obtained through OPSC Online.

**1. Type of Application**

Check the appropriate box that indicates the type of request the district is requesting with this form.

- a. If the District is requesting upfront funding for either site and/or design in a New Construction project or requesting upfront funding for design in a Modernization project, check the appropriate box in addition to the box for the Preliminary Small District Program Apportionment above.

**2. Type of Project**

- a. Select the type of project that best represents this application request and enter the total number of pupils assigned to the project for each grade group.
- b. Check the box if the project is eligible for funding for 50 year or older permanent buildings and report, at the option of the district:
- : The total number of eligible classrooms or the total eligible square footage building area at the site. Refer to Section 1859.78.6(b)(1)(A) or (b)(2)(A). Or,
  - : The total number of permanent classrooms or the total permanent square footage building area that is at least 50 years old and not been previously modernized with state funds. Refer to Section 1859.78.6(b)(1)(B) or (b)(2)(B).
  - : Enter the greater percentage as calculated under Regulation Section 1859.78.6(b)(1)(C) or Regulation Section 1859.78.6(b)(2)(C).
  - : If this project includes eligible 50 year or older pupil grants, enter the appropriate number assigned to the project for each grade group. The number of pupils entered cannot exceed the cumulative number of 50 year or older permanent buildings pupil grants requested for all Modernization funding applications for the site as determined by using the percentage factor above.
- c. If this request includes pupil grants generated by an Alternative Enrollment Projection Method, enter the number of pupils by grade level.
- d. Check the box if the project may be eligible for funding for 75 Years or Older Buildings and report the following, if applicable:
- : The estimated total number of eligible classrooms and/or the estimated total eligible square footage building area being demolished. Refer to Section 1859.78.7.1.
  - : The estimated total number of eligible classrooms and/or the

estimated total eligible square footage building area being constructed. Refer to Section 1859.78.7.1.

- : Enter the appropriate number assigned to the project for each grade group. The estimated number of pupils entered cannot exceed the cumulative number of pupil grants requested in Section 2a. and determined by using the percentage factor above.
- e. Indicate if this request is for funding of a 6–8 school and/or an Alternative Education School.
- f. Indicate the site scenario that best represents the project request.

**3. Number of Classrooms/Useable Acres**

Enter the:

- : Estimated number of classrooms in the proposed project.
- : Existing Useable Acres (if addition to existing site).
- : Estimated Proposed Useable Acres to be acquired for the project.

**4. Type of Financial Hardship Request**

If the district is requesting financial hardship assistance because it is unable to meet its matching share requirement on this application, the district must check the box and comply with the requirements of Section 1859.81.

**5. Preliminary Small District Program Apportionment – New Construction Only**

Check the appropriate box(es) if the district is planning to request the item listed as part of the Final Small District Program Apportionment. All remaining item requests that are not released as part of the Preliminary Small District Program Apportionment, but are made on this form, will be reserved for the district and released at the time of the Final Small District Program Apportionment as detailed in Sections 1859.157.7 and 1859.157.8. Refer to Section 1859.157.1 for eligibility criteria and further details. The district may be required to submit supporting documentation to substantiate any of the requests being made. Enter the:

- a. Estimated amount of therapy area in square feet as provided in Section 1859.72.
- b. Estimated amount of multilevel classrooms in the Plans and Specifications (P&S) pursuant to Section 1859.73.
- c. Check the box if the district is planning to request project assistance pursuant to Section 1859.73.1.
- d. Check the box if the district is planning to request the Project and Construction Management pursuant to Section 1859.157.1(b).
- e. If the project the district is planning to request SFP funding for does not require an Response Action (RA), refer to Section 1859.74. If the project the district is planning to request SFP funding for may require an RA on a site that is not leased or an addition to an existing site, refer to Section 1859.74.2. If the project the district is planning to request SFP funding for may require an RA on a leased site or an addition to an existing site, refer to Sections 1859.74.3 or 1859.74.4, respectively. The limitation of 50

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percent may be exceeded when unforeseen circumstances exist. CDE determines that the site is the best available site, and district must submit substantiation that the costs are the minimum required to complete the evaluation and RA.

- 1) Enter the estimated 50 percent amount of the actual cost.
- 2) Enter the estimated 50 percent amount of the appraised value of the site. If the request is made pursuant to Section 1859.74.5, enter 50 percent amount of the appraised value.
- 3) Enter the estimated 50 percent amount of the allowable relocation cost.
- 4) Enter the estimated two percent amount of the lesser of the actual cost or appraised value of the site (minimum \$25,000).
- 5) Enter the estimated 50 percent amount of the DTSC fee for review and approval of the phase one environmental site assessment and preliminary endangerment assessment reports. Refer to Sections 1859.74, 1859.74.1, 1859.74.5, 1859.75, 1859.75.1 and 1859.81.1.

A project that received site acquisition funds under the Lease-Purchase Program (LPP) as a priority two project is not eligible for site acquisition funds under the SFP. A district-owned site acquired with LPP, SFP or Proposition 1A funds is not eligible for funding under Section 1859.74.5.

- f. Enter the estimated 50 percent amount of the allowable amount for hazardous materials/waste removal and/or remediation for the site acquired pursuant to Sections 1859.74.2, 1859.74.3, 1859.74.4, 1859.75.1 or 1859.81.1. If an RA is required, check the box.
- g. Enter the estimated 50 percent amount of eligible service-site development, off-site development including pedestrian safety paths, and utilities costs allowed pursuant to Section 1859.76. If the District does not have an estimate available, the District can enter 35 percent of the New Construction or Modernization Grant amount for the projects eligible service-site development, off-site development, and utilities costs.

Check the box if the district is planning to request an Additional Grant for General Site Development pursuant to Section 1859.76.

- h. If the district is planning to request an Additional Grant for Energy Efficiency pursuant to Section 1859.71.3(a), enter the estimated percentage amount of energy efficiency that exceeds Title 24 requirements as prescribed in Section 1859.71.3(a)(3). If the district is requesting an Additional Grant for Energy Efficiency pursuant to Section 1859.71.3(c), enter the Energy Code compliance approach used (Performance Only, Prescriptive Only, Performance/Prescriptive) and the total score that is on the OPSC CA-CHPS Scorecard. A copy of the OPSC CA-CHPS Scorecard must be submitted to OPSC as part of the complete funding request.

- i. Check the box(es) if the district plans to request additional funding for fire code requirements authorized in Section 1859.71.2.

#### **6. Preliminary Small District Program Apportionment – Modernization Only**

Check the appropriate box(es) if the district is planning to request the item listed as part of the Final Small District Program Apportionment. All remaining item requests that are not released as part of the Preliminary Small District Program Apportionment, but are made on this form, will be reserved for the district and released at the time of the Final Small District Program Apportionment as detailed in Sections 1859.157.7 and 1859.157.8. Refer to Section 1859.157.2 for eligibility criteria and further details. Enter the:

- a. Check the box if the district is planning to request project assistance allowance pursuant to Section 1859.78.2.
- b. Check the box if the district is planning to request the Project and Construction Management pursuant to Section 1859.157.2(b).
- c. If the district is requesting an Additional Grant for Energy Efficiency pursuant to Section 1859.78.5(a), enter the estimated percentage of energy efficiency that exceeds Title 24 requirements as prescribed in Section 1859.78.5(a)(3). If the district is requesting an Additional Grant for Energy Efficiency pursuant to Section 1859.78.5(c), enter the Energy Code compliance approach used (Performance Only, Prescriptive Only, Performance/Prescriptive) and the total score that is on the OPSC CA-CHPS Scorecard. A copy of the OPSC CA-CHPS Scorecard must be submitted to OPSC as part of the complete funding request. If the District does not have an estimate available, the District can enter 5 percent of the New Construction or Modernization Grant amount for the projects eligible service-site development, off-site development, and utilities costs.
- d. Check the box if the district plans to request an additional grant for site development utility cost necessary for the Modernization of 50 years or older permanent building(s). Enter the estimated 60 percent amount of the eligible costs allowable pursuant to Section 1859.78.7(a).
- e. Check the box if the district requests an additional grant for site development utility cost necessary for the replacement of a 75 Years or Older Building, if not already provided under the provisions pursuant to Section 1859.78.7(a). Enter 60 percent of the eligible costs allowable.
- f. Check the box(es) if the district plans to request additional funding for fire code requirements authorized in Section 1859.78.4.
- g. Check the box if the district is planning to request an Additional Grant for a Minimum Essential Facility pursuant to Section 1859.78.9.1. Check the box for the type of facility the district is anticipating to make a request for (if the facility is a hybrid facility, select 'Hybrid' and indicate the type of facility on the line provided) and indicate the estimated amount of eligible Toilet and Other square footage being built in the project. Check the appropriate box depending on whether the anticipated Minimum Essential Facility in the project is permanent or portable construction. Check the box if the district is planning to request an additional grant for Site Development pursuant to Section 1859.78.9.1. At the District's option, the district may request

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35 percent of the Minimum Essential Facility supplemental grant or enter 60 percent of the amount calculated pursuant to Section 1859.78.9.1 (b)(7) or 1859.78.9.1 (c)(7).

- h. 1) Check the box if the district is planning to request an Additional Grant for Transitional Kindergarten (TK) classrooms for the construction of a new Transitional Kindergarten classroom(s) and/or retrofit of an existing school facility to be a Transitional Kindergarten classroom(s). Check the appropriate boxes if the district is planning to augment the grant with additional supplemental grants respective of the Transitional Kindergarten classroom project scope. Check the box if the district is planning to request an additional grant for Site Development pursuant to Regulation Section 1859.78.9.2. The district may choose to request 35 percent of the Transitional Kindergarten supplemental grant, or enter 60 percent of minimum work amount, pursuant to Regulation Section 1859.78.9.2(c)(4) or 1859.78.9.2(c)(5)(A).
- 2) The information needed to complete this section is based on the latest CBEDS enrollment data. Applications filed on or after November 1st must include the current school year enrollment data. Enter the CBEDS enrollment for grades TK-3 at the school site the current year and the three prior years' TK-3 enrollment, as appropriate.

Requests for funding shall include the following:

- : Site map that includes labelling of all facilities and their current use, and identifies all classrooms constructed or previously retrofitted to house kindergarten students.
- : Narrative that explains the current classroom and facility usage at the site, what the Small District plans to do with the project, and the resulting usage at the completion of the project.
- i. If the district is requesting an Additional Grant for Career Technical Education (CTE) Components pursuant to Section 1859.78.10, enter 60 percent of the costs for the eligible CTE component(s) in the entire Modernization application.

**7. Additional Project Information – Excessive Cost Hardship Request**

Check the appropriate box(es) if the district is planning to request an excessive cost hardship for the item listed as part of the Final Small District Program Apportionment. The Preliminary Small District Program Apportionment will not provide a separate advance release of funds for any excessive cost hardship requests, but these requests will be reserved for the district and released at the time of the Final Small District Program Apportionment as detailed in Sections 1859.157.7 and 1859.157.8. Refer to Section 1859.83 for eligibility criteria.

Requests for excessive cost grants for accessibility requirements are allowed only if required by the DSA. At the District's option, the district may request three percent of the Modernization base grant or enter the amount calculated pursuant to Regulation Section 1859.83(f). Attach a copy of the DSA approved list that shows the minimum work necessary for accessibility requirements. If the request is for the excessive cost grant for a new Alternative Education school pursuant to Section 1859.83(c)(2) and the district wishes to request less than the

maximum allowance, the district must submit a letter along with application indicating the requested amount.

**8. Priority Order**

Enter the district priority order of this application in relation to other applications for Preliminary Small District Program Apportionment that were submitted by the district on the same date.

**9. Return of Funding Application**

If the submittal of this application for a Preliminary Small District Program Apportionment will result in the need for a return of an application with the same scope of work that was previously submitted to OPSC prior to the effective date of the regulations for the Small District Program, enter the application number of the project. Failure to report this information may delay the processing of the application by OPSC.

**10. Prior Apportionment**

If the project received a separate apportionment under the SFP for either site and/or design, enter the application number of the project. Failure to report this information may delay the processing of the application by OPSC.

**11. Alternative Developer Fee**

The district must report certain alternative fees collected pursuant to Government Code Section 65995.7, as of the date of application submittal to OPSC. Refer to Section 1859.77 for details. Districts are advised that the OPSC may perform an audit of the developer fees collected prior to application approval by the Board.

**12. Adjustment to New Construction Baseline Eligibility**

Pursuant to Section 1859.51 certain adjustments to the District's New Construction baseline eligibility must be made each time a district submits an application for funding, to the OPSC for SFP New Construction or Modernization grants. These adjustments are made by the OPSC based on information reported by the district on this form.

- o Report all classroom(s) provided after the district submitted its request for determination of its New Construction baseline eligibility for the grades shown, or indicate N/A if there are none. Refer to Section 1859.51(i).
- o In the additional classroom column, indicate the number of additional net classrooms provided if not previously reported.
- o In the replacement classroom column, indicate the number of classrooms that were included in the determination of the District's New Construction eligibility pursuant to Education Code Section 17071.75 but replaced in a locally funded project.
- o Enter the date the initial construction contract was signed for additional or replacement classrooms.

**13. Pending Reorganization Election – New Construction Only**

Complete only for New Construction projects. Indicate if there is a pending reorganization election that will result in a loss of eligibility for this project. If the answer is "yes", the district must complete Form SAB 50-01, Form SAB 50-02 and Form SAB 50-03, to adjust the District's New Construction baseline eligibility as a



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result of the reorganization and submit them with this form.

**14. Joint-Use Facility/Leased Property**

Check the box if:

- a. The facilities to be constructed/modernized as part of this project will be for joint use by other governmental agencies.
- b. The New Construction or Modernization grants will be used for facilities located or to be located on leased property.

**15. Local Funding Adjustment Grant**

Enter estimated amounts for each of the following:

- a. The District's total assessed valuation, pursuant to Section 1859.70.5(a)(1). The district must provide a letter from the county auditor-controller that certifies the District's total assessed valuation.
- b. The District's gross bonding capacity, rounded to the nearest whole dollar. To calculate this, take the total assessed valuation and multiply that by 1.25 percent for non-unified Districts or 2.5 percent for unified Districts, rounded to two decimal places.
- c. The District's unduplicated pupil percentage as determined for purposes of the local control funding formula pursuant to Education Code Section 42238.02, rounded to two decimal places.
- d. The District's pupil enrollment, pursuant to Section 1859.70.5(a)(3) based on the latest CBEDS enrollment data as it would have been reported using the criteria in Parts A, C and D of the Form SAB 50-01. Applications filed on or after November 1 must include the current school year enrollment.
- e. Check Yes or No to indicate whether the project includes the use of a Project Labor Agreement for this application. If the district indicates it intends to have a Project Labor Agreement, but does not yet, it will be audited for compliance and the funding will be adjusted accordingly if it does not have a Project Labor Agreement.

**16. Certification**

The district representative must complete this section. For additional information regarding district certifications, refer to the SFP handbook located on the OPSC website at [www.dgs.ca.gov/opsc](http://www.dgs.ca.gov/opsc).

**APPLICATION FOR SMALL DISTRICT PROGRAM PRELIMINARY****APPORTIONMENT****SCHOOL FACILITY PROGRAM**

SAB 50-12 (New [insert the approval date by OAL])

The District named below applies to the State Allocation Board via the Office of Public School Construction for a grant under the provisions of Chapter 12.5, Part 10, Division 1, commencing with Section 17070.10, et seq., of the Education Code and the Regulations thereto.

DISTRICT		PRELIMINARY APPLICATION NUMBER
SCHOOL NAME		PROJECT TRACKING NUMBER
COUNTY	DISTRICT REPRESENTATIVE'S E-MAIL ADDRESS	HIGH SCHOOL ATTENDANCE AREA (HSAA) (IF APPLICABLE)

**1. Type of Application**

- ☐ Preliminary Small District Program Apportionment (New Construction)  
☐ Preliminary Small District Program Apportionment (Modernization)  
 a. ☐ Site and/or Design – New Construction ☐ Design Only – Modernization

e. Is this a 6–8 school? ☐ Yes ☐ No

If you answered yes, how many K–6 pupils reported above are sixth graders? \_\_\_\_\_

Is this an Alternative Education School? ☐ Yes ☐ No

**2. Type of Project**

- a. ☐ Elementary School ☐ Middle School ☐ High School
- Total Pupils Assigned:
- K–6 \_\_\_\_\_
- 7–8 \_\_\_\_\_
- 9–12 \_\_\_\_\_
- Non-Severe \_\_\_\_\_
- Severe \_\_\_\_\_
- b. ☐ 50 Years or Older Building Funding (Modernization Only)
- Total Eligible Classrooms/Square Footage: \_\_\_\_\_
- Classroom/Square Footage at Least 50 Years Old: \_\_\_\_\_
- Ratio of 50 Years Old Classrooms/Square Footage: \_\_\_\_\_ %

From 2a above, how many are 50 Year or Older Pupil Grants?

K–6: \_\_\_\_\_ Non-Severe: \_\_\_\_\_

7–8: \_\_\_\_\_ Severe: \_\_\_\_\_

9–12: \_\_\_\_\_

c. Included in 2a above, how many pupils are generated by the

Alternative Enrollment Projection? (New Construction Only)

K–6: \_\_\_\_\_ Non-Severe: \_\_\_\_\_

7–8: \_\_\_\_\_ Severe: \_\_\_\_\_

9–12: \_\_\_\_\_

d. If the request is to replace 75 Years or Older Facilities (Modernization Only)

Number of existing classrooms being demolished \_\_\_\_\_

The total square footage of non-classroom space being demolished \_\_\_\_\_

The number of classrooms being constructed \_\_\_\_\_

The total square footage of non-classroom space being constructed \_\_\_\_\_

- f. Project to be located on: ☐ Leased Site  
☐ New Site  
☐ Existing Site with Additional Acreage Acquired  
☐ Existing Site with No Additional Acreage Acquired

**3. Number of Classrooms/Useable Acres**

Number of Classrooms: \_\_\_\_\_

Existing Acres (Useable): \_\_\_\_\_

Proposed Acres (Useable): \_\_\_\_\_

**4. Type of Financial Hardship Request**

☐ Submittal pending OPSC approval pursuant to Section 1859.81(h)

**5. Preliminary Small District Program Apportionment –****New Construction Only**

a. Therapy: Toilets (sq. ft.) \_\_\_\_\_  
 Other (sq. ft.) \_\_\_\_\_

b. Multilevel Construction (CRS): \_\_\_\_\_

c. ☐ Project Assistance

d. ☐ Project and Construction Management

e. Site Acquisition:

- (1) 50 percent Actual Cost: \$ \_\_\_\_\_
- (2) 50 percent Appraised Value: \$ \_\_\_\_\_
- (3) 50 percent Relocation Cost: \$ \_\_\_\_\_
- (4) 2 percent (min. \$25,000): \$ \_\_\_\_\_
- (5) 50 percent DTSC Fee: \$ \_\_\_\_\_

f. 50 percent hazardous waste removal: \$ \_\_\_\_\_

☐ Response Action (RA)

**APPLICATION FOR SMALL DISTRICT PROGRAM PRELIMINARY****APPORTIONMENT****SCHOOL FACILITY PROGRAM**

SAB 50-12 (New [insert the approval date by OAL])

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## g. Site Development

- ☐ 50 percent Service-Site: \$ \_\_\_\_\_
- ☐ 50 percent Off-Site: \$ \_\_\_\_\_
- ☐ 50 percent Utilities: \$ \_\_\_\_\_
- ☐ General Site

h. ☐ % Above Energy Efficiency for each building: \_\_\_\_\_

Energy Code Compliance Approach Used (select one):

- ☐ Prescriptive Only
- ☐ Prescriptive/Performance
- ☐ Performance Only (with the exception of mandatory prescriptive measures)

OPSC CA-CHPS Score (Indicate Points): \_\_\_\_\_

i. ☐ Automatic Fire Detection/Alarm System☐ Automatic Sprinkler System**6. Preliminary Small District Program Apportionment - Modernization Only**a. ☐ Project Assistanceb. ☐ Project and Construction Managementc. ☐ % Above Energy Efficiency for each building: \_\_\_\_\_

Energy Code Compliance Approach Used (select one):

- ☐ Prescriptive Only
- ☐ Prescriptive/Performance
- ☐ Performance Only (with the exception of mandatory prescriptive measures)

OPSC CA-CHPS Score (Indicate Points): \_\_\_\_\_

d. ☐ Site Development—60 percent utilities: \$ \_\_\_\_\_e. ☐ Site Development—75 Years or Older: \$ \_\_\_\_\_f. ☐ Automatic Fire Detection/Alarm Systemg. ☐ Minimum Essential Facility

- ☐ Multipurpose
- ☐ Gymnasium
- ☐ Library
- ☐ Kitchen
- ☐ Hybrid: \_\_\_\_\_

Toilet (sq. ft.): \_\_\_\_\_

Other (sq. ft.): \_\_\_\_\_

Construction Type

- ☐ Permanent
- ☐ Portable

☐ Site Development pursuant to Section 1859.78.9.1

- ☐ 35 percent of supplemental grant; or,
- ☐ 60 percent of minimum work \$ \_\_\_\_\_

## h. 1) Transitional Kindergarten Classroom(s)

☐ New Construction

Number of Classroom(s): \_\_\_\_\_

☐ Automatic Fire Detection/Alarm System☐ Automatic Sprinkler System☐ Multilevel Classrooms(s) Construction: \_\_\_\_\_☐ Retrofit

Number of Classroom(s): \_\_\_\_\_

☐ Automatic Fire Detection/Alarm System☐ 50-year-old utilities☐ Site Development pursuant to Section 1859.78.9.2☐ 35 percent of supplemental grant; or,☐ 60 percent of minimum work \$ \_\_\_\_\_

## h. 2) Enrollment Data for Site

	3rd Prev.	2nd Prev.	Previous	Current
Grade	/	/	/	/
TK				
K				
1				
2				
3				
TOTAL	0	0	0	0

i. ☐ Career Technical Education Components – 60 percent: \$ \_\_\_\_\_**7. Additional Project Information – Excessive Cost Hardship Request****New Construction Only**☐ Geographic Percent Factor: \_\_\_\_\_ %☐ New School Project [Section 1859.83(c)(1)]☐ New School Project [Section 1859.83(c)(2)]☐ Small Size Project☐ Urban/Security/Impacted Site:

If a new site, \$ \_\_\_\_\_ per Useable Acre [Section 1859.83(d)(2)(C)]

**Modernization Only**☐ Geographic Percent Factor: \_\_\_\_\_ %☐ Small Size Project☐ Urban/Security/Impacted site☐ Accessibility/Fire Code☐ 3 percent of base grant; or,☐ 60 percent of minimum work \$ \_\_\_\_\_☐ Number of 2-Stop Elevators: \_\_\_\_\_☐ Number of Additional Stops: \_\_\_\_\_**8. Priority Order:** # \_\_\_\_\_**9. Return of Funding Application:** # \_\_\_\_\_

**APPLICATION FOR SMALL DISTRICT PROGRAM PRELIMINARY****APPORTIONMENT****SCHOOL FACILITY PROGRAM**

SAB 50-12 (New [insert the approval date by OAL])

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**10. Prior Apportionment**

Site/Design—New Construction: 50/ \_\_\_\_\_

Design—Modernization: 57/ \_\_\_\_\_

**11. Alternative Developer Fee—New Construction Only**

Alternative developer fee collected and reportable pursuant to

Regulation Section 1859.77: \$ \_\_\_\_\_

**12. Adjustment to New Construction Baseline Eligibility**

Classroom(s) provided:

Additional	Replacement
K-6: _____	K-6 _____
7-8: _____	7-8 _____
9-12: _____	9-12 _____
Non-Severe: _____	Non-Severe _____
Severe: _____	Severe _____

Construction Contract(s) for the project signed on:

\_\_\_\_\_

**13. Pending Reorganization Election – New Construction Only**☐ Yes ☐ No**14. Joint-Use Facility/Leased Property**a. ☐ Joint-Use Facilityb. ☐ Leased Property**15. Local Funding Adjustment Grant**

a. Total Assessed Valuation: \_\_\_\_\_

b. District's gross bonding capacity, (rounded to the nearest whole dollar):

\_\_\_\_\_

c. District's unduplicated pupil percentage, rounded to two decimal places:

\_\_\_\_\_ %

d. District's enrollment: \_\_\_\_\_

e. Does this project include the use of a Project Labor Agreement?

☐ Yes ☐ No

**APPLICATION FOR SMALL DISTRICT PROGRAM PRELIMINARY  
APPORTIONMENT  
SCHOOL FACILITY PROGRAM**

SAB 50-12 (New [insert the approval date by OAL])

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**16. Certification**

I certify, as the District Representative, that the information reported on this form is true and correct and that:

- I am an authorized representative of the district as authorized by the governing board of the district; and,
- A resolution or other appropriate documentation supporting this application under Chapter 12.5, Part 10, Division 1, Article 11, commencing with Section 17078.10, et. seq., of the Education Code was adopted by the District's Governing Board on, \_\_\_\_\_; and,
- The district will establish a "Restricted Maintenance Account" for exclusive purpose of providing ongoing and major maintenance of school buildings and has developed an ongoing and major maintenance plan that complies with and is implemented under the provisions of Education Code Section 17070.75 and 17070.77 (Refer to Sections 1859.100 through 1859.102); and,
- The district has or will consider the feasibility of the joint use of land and facilities with other governmental agencies in order to minimize school facility costs; and,
- The district will comply with all laws pertaining to the construction of its school building; and,
- All contracts entered for the service of any architect, structural engineer or other design professional for any work under the project have been obtained pursuant to a competitive process that is consistent with the requirements of Chapter 10 (commencing with Section 4525) of Division 5, of Title 1, of the Government Code; and,
- The district has or will comply with the Public Contract Code regarding all laws governing the use of force account labor; and,
- This district has or will comply with Education Code Section 17076.11 regarding at least a 3 percent expenditure goal for disabled veteran business enterprises; and,
- The district has or will utilize the Preliminary Small District Program Apportionment for New Construction or Modernization purposes; and,
- The statements set forth in this application and supporting documents are true and correct to the best of my knowledge and belief; and,
- The district acknowledges this request has or will be subject to the material inaccuracy penalty provisions in Section 1859.104.1; and
- All school facilities purchased or newly constructed under the project for use by pupils who are individuals with exceptional needs, as defined in Education Code Section 56026, shall be designed and located on the school site so as to maximum interaction between those individuals with exceptional needs and other pupils as appropriate to the needs of both; and,
- If the Preliminary Small District Program Apportionment is requested for the construction of school facilities on leased land, the district has or will enter into a lease agreement for the leased property that meets the requirements of Section 1859.22; and,
- The district understands that if the submittal of this application for a Preliminary Small District Program Apportionment will result in the need for a return of an application with the same scope of work that was previously submitted to OPSC prior to the effective date for the Small District Program, the district needed to enter the application number of the project that needed to be returned unprocessed into the form above. Failure to report this information may result in a delay for the processing of this application by OPSC and/or the return of this application unprocessed by OPSC; and,
- The district understands that an offset for prior funding received on a previously funded New Construction site and/or design or Modernization design application that is indicated in this application will occur on either the Preliminary Small District Program Apportionment or the Final Small District Program Apportionment to adjust for prior funding that was previously received by the district for the same scope of work being completed.
- The district understands that when the Preliminary Small District Program Apportionment is converted to a Final Small District Program Apportionment, the funding available for the Final Small School District Program Apportionment will be subject to the provisions of Sections 1859.157.7 and 1859.157.8; and,
- The district has or will comply with the reporting requirements in Section 1859.158 and shall annually hold, at a regularly scheduled meeting of the District's governing board, a public hearing to discuss, and receive public comment regarding the report(s); and,
- The district understands that some or all the State funding for the project must be returned to the State as a result of an audit pursuant to Section 1859.157.5; and,
- The district has complied with the provisions of Section 1859.76 and 1859.79.2 that the portion of the project funded by the State does not contain work specifically prohibited in this Section; and,
- The district matching funds required pursuant to Section 1859.77.1 has either been expended by the district, deposited in the County School Facility Fund or will be expended by the district prior to the notice of completion for the project; and,
- The district understands that if the project and construction management grant is requested pursuant to 1859.157.1 or 1859.157.2, and the district does not obtain project and/or construction management services from a county office of education, other local educational agency with applicable school facilities construction expertise, applicable state department, or a certified private construction consulting entity, or expend funds on these services, the total approved project costs will be reduced by the construction management grant and associated required matching share.
- This form is an exact duplicate (verbatim) of the form provided by the OPSC. In the event a conflict should exist, then the language in the OPSC form will prevail.

NAME OF DISTRICT REPRESENTATIVE (PRINT)

PHONE NUMBER

SIGNATURE OF DISTRICT REPRESENTATIVE

DATE

California Department of Education's  
Priority School District Program Regulations

See Separate Document posted on  
[OPSC's Website](#)

## ATTACHMENT C1

### OFFICE OF PUBLIC SCHOOL CONSTRUCTION STAKEHOLDER MEETING September 18, 2025

#### EVALUATION OF TRANSITIONAL KINDERGARTEN PUPILS IN SCHOOL FACILITY PROGRAM ENROLLMENT PROJECTIONS

##### PURPOSE

To continue to discuss and receive stakeholder feedback regarding reporting Transitional Kindergarten (TK) in current enrollment projections as its own grade category, and to present proposed amendments to the *Enrollment Certification/Projection* (Form SAB 50-01).

##### AUTHORITY

See Attachment C1a.

##### BACKGROUND

The Office of Public School Construction (OPSC) held a public meeting on February 20, 2025, to discuss proposed amendments to the Form SAB 50-01 and the potential inclusion of reporting TK enrollment as its own grade category in current enrollment projections.

The full text of the February 20, 2025 stakeholder meeting item can be found at the link below:

[February 20, 2025 OPSC Stakeholder Meeting #3 - Item](#)

The recording of the February 20, 2025 meeting is available at the link below. It includes feedback that OPSC was able to respond to at the time of the meeting:

[February 20, 2025 OPSC Stakeholder Meeting #3 - Recording](#)

Attachment E includes the full text of the stakeholder feedback that was received from the February 20, 2025 meeting.

##### STAFF ANALYSIS/DISCUSSION

###### **Summary of Stakeholder Feedback**

Staff would like to thank stakeholders who were able to view, attend, or participate in this meeting, and those who provided valuable feedback. Below is a summary of the stakeholder feedback that was received and OPSC's responses:



STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p>1. Option 1 appears to be the most accurate projection once the TK program has completed its age expansion to all four year olds. Until then, there may be short-term variances.</p> <p>Option 5, which projects TK similarly to Special Day Class pupils, also appears to be accurate, reflecting district growth and decline. Since this new method would not go into effect until we have the enrollment data for the fall of 2025, TK will already be open to all four year olds.</p>	<p>1. OPSC acknowledges this stakeholder's comment that with TK age expansion fully implemented beginning in the 2025-2026 school year, Option 1 appears to be the most logical.</p> <p>In OPSC's efforts to continue the discussion and analysis on how the different projection methods align with actual enrollment five years later, OPSC tested the fifth-year enrollment projection using 2019-2020 as the current enrollment year and compared it to the actual enrollment data reported to the California Department of Education (CDE). Results are shown further in the Staff Analysis/Discussion.</p> <p>OPSC acknowledges this stakeholder's feedback indicating that Option 5 appears to be the second most logical option.</p>
<p>2. The full implementation of TK is expected in the 2025-2026 school year. Since the phased implementation is still ongoing, selecting a methodology now would be premature, as its impact on a district's ability to request funding remains uncertain. The stakeholder recommends continuing discussions and additional analysis on how different enrollment projection methods align with actual enrollment trends and needs.</p>	<p>2. OPSC acknowledges stakeholder concerns that selecting a methodology now could be premature, since the full implementation of TK is just now occurring in the 2025-2026 school year. However, because TK enrollment is reported as a separate grade level on CDE's DataQuest and is now a more consistent part of enrollment, OPSC suggests moving forward with selecting an option at this time. However, to allow for a phase-in of the new methodology, OPSC proposes allowing Approved Applications for New Construction funding that are currently on OPSC's Workload List and those that are received until the date the proposed regulations are in effect, to be grandfathered in, using the methodology currently in place.</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
	<p><b>2. (cont.)</b> To further facilitate the transition, OPSC proposes that Approved Applications received on or after the effective date of the regulations through October 31, 2026, would have the option to use either the current or new methodology. Approved Applications received on or after November 1, 2026, would be required to use the new methodology. This recommendation accounts for the length of time it takes to process Approved Applications for New Construction funding and is further explained in the Staff Analysis/Discussion section of this item.</p>
<p><b>3.</b> Considering applications may take up to four years to review, how will OPSC address applications submitted under the current projection method process, given the potential negative impacts districts may encounter with changes to the Form SAB 50-01?</p> <p>Suggestion: (a) implement the program prospectively for future applications (2025-2026 school year and beyond); or (b) allow applications filed prior to reporting TK enrollment as its own grade, to have the option of using the old or new Form SAB 50-01, as long as they can show loss of eligibility to the extent that funding will be jeopardized.</p> <p>The current methodology should be updated due to full implementation of TK this year.</p>	<p><b>3.</b> OPSC acknowledges and appreciates this stakeholder's feedback and suggestions. In consideration of this input, OPSC proposes a phase-in of the new methodology, as described in the response to #2 above.</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p><b>4.</b> Option 1 is the best path forward. As long as TK remains non-compulsory, it should be treated as its own distinct population. Projection options using TK enrollment to directly calculate future Kindergarten enrollment via cohort survival are flawed. Thus Options 2 and 4 should not be considered.</p> <p>Current methodologies for calculating Kindergarten work well and do not need to be altered. Calculating future TK similarly is the most logical.</p> <p>Using actual historical TK enrollments is better than using the average, as proposed in Option 3. While this is currently appealing amidst the expansion of TK, the regulations adopted need to work for future years. Once TK is fully implemented for all four year olds, using the average TK enrollment would be pointless compared to using actual TK enrollment. Additionally, this option would require integrating new calculations into the projection calculator.</p> <p>Option 5 also keeps TK distinct without altering current Kindergarten methodology. However, this option adds complex alterations to the Form SAB 50-01 compared to Option 1.</p>	<p><b>4.</b> OPSC agrees that Option 1 appears to be the best option because the linear weighted average calculation is applied to both TK and Kindergarten, using actual TK enrollment data.</p> <p>As noted above, OPSC has tested the fifth-year enrollment projection using 2019-2020 as the current enrollment year and compared it to the actual enrollment data reported to CDE. Results are shown further in the Staff Analysis/Discussion section of this item.</p>
<p><b>5.</b> It would be beneficial to use more current data in testing the various options, inclusive of 2022-2023 and forward, when the Universal TK (Assembly Bill 130) program has been phased in, and TK enrollment has increased.</p> <p>The stakeholder also provided observations and input on each of the</p>	<p><b>5.</b> OPSC acknowledges this stakeholder's feedback that it would be beneficial to test the options using more current enrollment data. After careful consideration, OPSC opted to test the accuracy of the Form SAB 50-01 and the different options presented in this item by testing the fifth-year enrollment projection using 2019-2020 as the current enrollment year and</p>

STAFF ANALYSIS/DISCUSSION (cont.)

Stakeholder Feedback	OPSC Response
<p><b>5. (cont.)</b> Options, as follows:</p> <p>Option 1: 0% average change; isolates and minimizes TK change/impacts. Option favored.</p> <p>Option 2: 171% average change; creates false inflation with data used, but with current enrollment, the changes may be less drastic. Option favored, with more analysis.</p> <p>Option 3: 10.5% average change; doesn't use actual enrollment; minimizes fluctuations in TK. Option not supported because actual enrollment is not used.</p> <p>Option 4: -8.5% average change; likely inaccurate representation of actual need. Option not supported because actual enrollment is not used.</p> <p>Option 5: -0.2% average change; TK is a variable group; possibly a less accurate projection method; doesn't account for year-over-year trends. Option not supported.</p> <p>Option 6: Shows false dip between Kindergarten and 1st grade, which seems unfair and inaccurate. Option not supported.</p>	<p><b>5. (cont.)</b> comparing it to the actual enrollment data reported to the CDE, which allows for comparison of projections to actual reported enrollment. Results for testing the fifth-year enrollment projection using the 2019-2020 as the current enrollment year are shown further in the Staff Analysis/Discussion section of this item.</p>

**Summary of Results**

*Acknowledgement*

OPSC recognizes that the age expansion for TK is fully implemented in the 2025-2026 school year, and TK enrollment in future years may fluctuate. Given that TK enrollment is already being reported separately in CDE's DataQuest and is becoming more standardized, OPSC recommends moving forward with selecting a methodology now.

Following the last stakeholder meeting on this topic, OPSC tested the accuracy of Option 1 by using the 2019-2020 school year as the current enrollment year and comparing the resulting five-year projected enrollment to the actual data reported to

## STAFF ANALYSIS/DISCUSSION (cont.)

CDE. The reason OPSC looked to the past to assess accuracy is that because actual 2024-2025 enrollment data is currently available, and therefore five-year enrollment projections made in 2019-2020 under both the current and proposed Option 1 methodology could be compared to actual enrollment data five years later, as a measure of the relative accuracy of both projection methods.

It is important to note that OPSC tested Option 1 using the 2019-20 school year as the current enrollment year (which, in turn, factors enrollment data from 2016-2017 through 2019-2020 into the projection calculations) to avoid confounding COVID-19 impacts on enrollment, while acknowledging that residual effects may still have influenced the 2020-2021 through 2024-2025 enrollment trends. TK was also not a common grade level during 2016-2017 through 2019-2020 enrollment years. Now, with the full implementation of TK age expansion in 2025-2026, TK being reported as its own grade level to CDE, and diminishing COVID-19 impacts on enrollment, it appears appropriate to modify the Form SAB 50-01 to account for TK as a separate grade, as reflected in Option 1.

Although OPSC recommends selecting a methodology at this time, OPSC proposes that the new methodology will not be implemented until the date the regulations are in effect, which is after approval by the State Allocation Board (Board) and review by the Office of Administrative Law (OAL). Specifically, OPSC proposes that Approved Applications for New Construction that are currently on OPSC's Workload List and submittals received until the date the proposed regulations are in effect, would use the current methodology on the current Form SAB 50-01. Additionally, OPSC proposes that Approved Applications received on or after the effective date of the regulations through October 31, 2026, will have the option to use the current or new methodology, and submittals received on or after November 1, 2026, will be required to use the new methodology on the revised Form SAB 50-01. The November 1 date is consistent with the current annual change over in enrollment years for the School Facility Program.

For example, if Option 1 is adopted, a separate row for TK in Part A, with a linear calculation will be added. Approved Applications for New Construction funding received prior to the effective date of the revised Form SAB 50-01, will continue to use the current version of the Form SAB 50-01 and the current methodology of reporting TK enrollment combined with K enrollment under the K row. Approved Applications for New Construction funding received on or after the effective date of the regulations through October 31, 2026, will use the revised Form SAB 50-01, but will have the option to use the current methodology by leaving the TK row blank and entering the TK enrollment combined with the kindergarten enrollment under the K row. A linear projection calculation will then be used for the K row. Approved Applications submitted on or after November 1, 2026, will be required to use the new methodology on the revised Form SAB 50-01 and will enter the TK enrollment separately in the TK row, with a linear projection calculation used for both TK and kindergarten.

**STAFF ANALYSIS/DISCUSSION (cont.)**

To further clarify how the current and new methodology will be applied, below is a table that shows the three different scenarios we anticipate for Approved Applications for New Construction funding submittals:

<b><i>Application for Funding (Form SAB 50-04) Received Date</i></b>	<b>TK/K Grade Level Pupil Data on the Enrollment Certification/Projection (Form SAB 50-01)</b>	
	<b>Report TK/K enrollment combined</b>	<b>Report TK/K enrollment separately</b>
Form SAB 50-04 received by OPSC prior to effective date of revised Form SAB 50-01	Required	N/A
Form SAB 50-04 received by OPSC between the effective date of the revised Form SAB 50-01 and through 10/31/2026	Optional (select one), using the revised Form SAB 50-01	
Form SAB 50-04 received by OPSC on or after 11/1/2026	N/A	Required

This recommendation accounts for the length of time it takes to process Approved Applications for New Construction funding and allows School Districts to begin planning now for potential enrollment changes in 2026/2027. For example, OPSC is currently processing applications received in 2022. Therefore, Approved Applications for New Construction funding submitted in 2025 or 2026 may not be processed until 2028 or 2029. Allowing School Districts to use the current methodology for applications submitted prior to the effective date of the revised Form SAB 50-01, maintains consistency for School Districts that made funding plans under the existing regulations. Additionally, allowing School Districts the option to use the current or new methodology for applications submitted on or after the effective date, through October 31, 2026, offers districts a more phased-in transition to reporting TK as its own grade level on the Form SAB 50-01 as a result of the full TK implementation.

Below are the results of testing Option 1.

**Option 1 – TK and Kindergarten Linear Weighted Average Projection and Grades 1-12 Cohort Survival Method Projection, Using Actual TK Enrollment**

Based on the previous stakeholder meeting, both stakeholders and OPSC favored Option 1. This option uses actual TK enrollment and applies the current Kindergarten linear weighted average calculation on the Form SAB 50-01 separately for TK and Kindergarten and uses the current cohort survival projection methodology for grades 1-12.

## STAFF ANALYSIS/DISCUSSION (cont.)

With data now available through the 2024-2025 enrollment year on the DataQuest website, OPSC compared those fifth-year enrollment projections for Option 1 with the actual enrollment reported by the School Districts to CDE. This comparison was done to evaluate the accuracy of using Option 1 for enrollment projections. Below are the results:

### District A (Small School District)

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	695	685	959
Percentage of Actual	72.47%	71.43%	N/A

### District B (Large School District)

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	39,136	39,626	39,700
Percentage of Actual	98.58%	99.81%	N/A

### District C (Small School District)

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	931	756	1,026
Percentage of Actual	90.74%	73.68%	N/A

### District D (Medium School District)

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	12,063	12,743	11,402
Percentage of Actual	105.80%	111.76%	N/A

### District E (Large School District)

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	29,490	29,610	26,537
Percentage of Actual	111.13%	111.58%	N/A

STAFF ANALYSIS/DISCUSSION (cont.)

**District F (Medium School District)**

	Current Methodology 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	TK - K Linear 5 <sup>th</sup> Year Projection 2020/21 – 2024/25 (Projected)	Actual Enrollment 5 Years Later 2024/25 (Actual)
Total Enrollment	6,641	6,436	6,570
Percentage of Actual	101.08%	97.96%	N/A

OPSC selected six School Districts to reflect a range of enrollment patterns across two large, two medium, and two Small School Districts. These School Districts were chosen to reflect differing sizes and enrollment trends. Details for each School District's actual enrollment trends are provided below:

Large School Districts:

- District B: Enrollment increased slightly between 2016-2017 and 2019-2020.
- District E: Enrollment declined slightly.

Medium School Districts:

- District D: Enrollment remained mostly consistent, with a slight increase.
- District F: Enrollment decreased slightly.

Small School Districts:

- District C: Enrollment increased slightly; no TK enrollment reported in 2016-2017 and 2017-2018.
- District A: Enrollment decreased slightly.

Option 1, on average, overestimated the actual enrollment by 5.28% for medium and large School Districts. As acknowledged, OPSC recognizes that School Districts may continue to experience residual impacts of COVID-19 on enrollment trends. It is also important to recognize that the tenth-year enrollment projection, as well as any augmentations (e.g., modified weighting, alternate weighting, birth data, and/or dwelling units) to the fifth-year enrollment projection will impact the projected enrollment. Use of an alternative weighting method could also produce hundreds of potential outcomes. Implementation of Option 1 would not impact School Districts' ability to use these augmentations or alternative weighting methods, and School Districts may therefore continue to augment the projection method to best represent the enrollment trends of the School District.

When testing Option 1, Small School Districts showed greater variability. Even slight changes in TK or kindergarten enrollment can have a significant impact on enrollment projections for Small School Districts in comparison to a medium size School District with thousands of students, or a large School District with tens of thousands of students. Thus, it is important to note that with the implementation of the Kindergarten through Grade 12 Schools and Local Community College Public Education Facilities



### STAFF ANALYSIS/DISCUSSION (cont.)

Modernization, Repair, and Safety Bond Act of 2024 (Proposition 2), Small School Districts now have the option to lock in eligibility for five years, providing additional stability when enrollment fluctuates.

The enrollment trends for TK and kindergarten appear to fluctuate independently, supporting that TK acts as a separate grade level rather than an extension of kindergarten. The results from Option 1 show the fifth-year enrollment projections when TK is its own grade level. This reduces TK enrollment fluctuation effects/impact on other grade levels, most notably, the Kindergarten grade level. These projections are a true reflection of how combining TK with kindergarten enrollment creates results that are skewed. By projecting TK independently of the other grade levels and having the independently projected TK enrollment added to the K-6 projection, Option 1 reduces the influence that TK fluctuations have on kindergarten enrollment and projections on future grades levels, and provides a clearer representation of overall enrollment trends. While this approach did not significantly impact the overall TK-6 projected enrollment, it highlights the importance of recognizing TK as its own grade level.

As TK continues to become a more consistent and distinct part of statewide enrollment reporting, breaking it out is important for transparency, long-term planning, and alignment with how the grade is tracked and implemented, especially as the TK age expansion is fully implemented in the 2025-2026 school year.

Attachment C1b contains the one-year through five-year projected enrollment for the current methodology and proposed Option 1 methodology, compared to the actual data reported in the DataQuest website, and projection calculations for all six School Districts.

### **Recommendations**

1. Move forward with Option 1 as the preferred methodology for reporting TK enrollment as its own grade category in current enrollment projections.
2. Approved Applications for New Construction funding received prior to the effective date of the regulations will use the current methodology in the current Form SAB 50-01.
3. Approved Applications for New Construction funding received on or after the effective date of the revised Form SAB 50-01 through October 31, 2026, will have the option to use either the current methodology or the new methodology in the revised Form SAB 50-01.
4. Approved Applications for New Construction funding received on or after November 1, 2026, will be required to use the new methodology in the revised Form SAB 50-01.

### **Request for Stakeholder Feedback**

Staff request further stakeholder feedback for Option 1, as presented above. This scenario is not the only option for breaking out TK enrollment on the Form SAB

STAFF ANALYSIS/DISCUSSION (cont.)

50-01, but it appears to be the most appropriate because it uses actual TK enrollment for all reporting years and, with the linear calculations for grades TK and K, there does not appear to be an inaccurate representation of housing needs within the School District. Further stakeholder feedback on this option and the recommendations in this item is encouraged.

AUTHORITY**Education Code (EC) Section 48000 - Kindergartens**

(a) A child shall be admitted to a kindergarten maintained by the school district at the beginning of a school year, or at a later time in the same year, if the child will have their fifth birthday on or before one of the following dates:

- (1) December 2 of the 2011–12 school year.
- (2) November 1 of the 2012–13 school year.
- (3) October 1 of the 2013–14 school year.
- (4) September 1 of the 2014–15 school year and each school year thereafter.

(b) The governing board of the school district of a school district maintaining one or more kindergartens may, on a case-by-case basis, admit to a kindergarten a child having attained the age of five years at any time during the school year with the approval of the parent or guardian, subject to the following conditions:

(1) The governing board of the school district determines that the admittance is in the best interests of the child.

(2) The parent or guardian is given information regarding the advantages and disadvantages and any other explanatory information about the effect of this early admittance.

(c)(1) As a condition of receipt of apportionment for pupils in a transitional kindergarten program pursuant to Section 46300, and Chapter 3 (commencing with Section 47610) of Part 26.8, as applicable, a school district or charter school shall ensure the following:

(A) In the 2012–13 school year, a child who will have their fifth birthday between November 2 and December 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(B) In the 2013–14 school year, a child who will have their fifth birthday between October 2 and December 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(C) From the 2014–15 school year to the 2021–22 school year, inclusive, a child who will have their fifth birthday between September 2 and December 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(D) In the 2022–23 school year, a child who will have their fifth birthday between September 2 and February 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(E) In the 2023–24 school year, a child who will have their fifth birthday between September 2 and April 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(F) In the 2024–25 school year, a child who will have their fifth birthday between September 2 and June 2 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(G) In the 2025–26 school year, and in each school year thereafter, a child who will have their fourth birthday by September 1 shall be admitted to a transitional kindergarten program maintained by the school district or charter school.

(2) (A) In any school year, a school district or charter school may, at any time during a school year, admit a child to a transitional kindergarten program who will have their fifth birthday after the date specified for the applicable year in subparagraphs (A) to (F), inclusive, of paragraph (1) but during that same school year, with the approval of the parent or guardian, subject to the following conditions:

(i) The governing board of the school district or the governing body of the charter school determines that the admittance is in the best interests of the child.

AUTHORITY (cont.)

(ii) The parent or guardian is given information regarding the advantages and disadvantages and any other explanatory information about the effect of this early admittance.

(B) Notwithstanding any other law, a pupil admitted to a transitional kindergarten program pursuant to subparagraph (A) shall not generate average daily attendance for purposes of Section 46300, or be included in the enrollment or unduplicated pupil count pursuant to Section 42238.02, until the pupil has attained the pupil's fifth birthday, regardless of when the pupil was admitted during the school year.

(d) For purposes of this section, "transitional kindergarten" means the first year of a two-year kindergarten program that uses a modified kindergarten curriculum that is age and developmentally appropriate.

(e) A transitional kindergarten shall not be construed as a new program or higher level of service.

(f) It is the intent of the Legislature that transitional kindergarten curriculum be aligned to the California Preschool/Transitional Kindergarten Learning Foundations developed by the department.

(g) As a condition of receipt of apportionment for pupils in a transitional kindergarten program pursuant to Section 46300, a school district or charter school shall do all of the following:

(1) Maintain an average transitional kindergarten class enrollment of not more than 24 pupils for each schoolsite. For purposes of this calculation, the following shall apply for each schoolsite of a school district or charter school:

(A) "Class" means a group of pupils scheduled to report regularly at a particular time to a particular teacher during the regular schoolday, as defined by the governing board of the school district or the governing body of the charter school, as applicable, excluding special day classes. Classes in the evening and summer school class shall not be considered classes for purposes of this calculation.

(B)(i) "Active enrollment count" for purposes of subparagraph (C) means the count of all pupils enrolled in a class with transitional kindergarten pupils on the first day of the school year on which the class was in session, plus all later enrollees, minus all withdrawals since that first day. An active enrollment count shall be made on the last teaching day of each school month that ends before April 15 of the school year.

(ii) For school districts, active enrollment count shall not include pupils enrolled in independent study pursuant to Article 5.5 (commencing with Section 51744) of Chapter 5 of Part 28 who meet the minimum day requirements for independent study and are continually enrolled in independent study for more than 14 schooldays in a school year.

(iii) For charter schools, active enrollment count shall not include pupils enrolled in independent study pursuant to Article 5.5 (commencing with Section 51744) of Chapter 5 of Part 28 who are continually enrolled in independent study for more than 14 schooldays on any of the days on which school is taught for the purpose of meeting the 175-instructional-day offering, as described in Section 11960 of Title 5 of the California Code of Regulations.

(C) "Average number of pupils enrolled per class" means the quotient of the sum of the active enrollment counts made under subparagraph (B) divided by the total number of those active enrollment counts for each class of the schoolsite.

(D) "Average transitional kindergarten class enrollment" means the quotient of the sum of the average number of pupils enrolled per class determined pursuant to subparagraph (C) of all classes at the schoolsite divided by the total number of all classes at the schoolsite that include transitional kindergarten pupils, rounded to the nearest half or whole integer.

AUTHORITY (cont.)

(2) Commencing with the 2022–23 school year, maintain an average of at least one adult for every 12 pupils for transitional kindergarten classrooms at each schoolsite. For purposes of this calculation, the following shall apply for each schoolsite of a school district or charter school:

(A) “Total transitional kindergarten enrollment” is the sum of the average number of pupils enrolled per class of all classes at the schoolsite, as determined in subparagraph (C) of paragraph (1).

(B) “Number of adults” shall be determined for each schoolsite as follows:

(i) A count of employees of the school district or charter school assigned to each class at the schoolsite that includes transitional kindergarten pupils shall be made on the last teaching day of each school month that ends before April 15 of the school year.

(ii) The sum of all of the adult counts pursuant to clause (i) shall be divided by the total number of those counts, rounded to the nearest half or whole integer.

(C) “Adult-to-pupil ratio” shall be the quotient of the total transitional kindergarten enrollment divided by the total number of adults, rounded to the nearest half or whole integer.

(3) (A) Commencing with the 2025–26 school year, and for each year thereafter, maintain an average of at least one adult for every 10 pupils for transitional kindergarten classrooms.

(B) It is the intent of the Legislature to appropriate funds for purposes of this paragraph.

(4) Ensure that credentialed teachers who are first assigned to a transitional kindergarten classroom after July 1, 2015, have, by August 1, 2025, one of the following:

(A) At least 24 units in early childhood education, childhood development, or both.

(B) As determined and documented by the local educational agency employing the teacher, professional experience in a classroom setting with preschool age children meeting the criteria established by the governing board or body of the local educational agency that is comparable to the 24 units of education described in subparagraph (A).

(C) A child development teacher permit, or an early childhood education specialist credential, issued by the Commission on Teacher Credentialing.

(h) A school district or charter school may place four-year-old children, as defined in Section 8205, enrolled in a California state preschool program into a transitional kindergarten program classroom. A school district or charter school that commingles children from both programs in the same classroom shall meet all of the requirements of the respective programs in which the children are enrolled, and the school district or charter school shall adhere to all of the following requirements, irrespective of the program in which the child is enrolled:

(1) An observation using the Classroom Assessment Scoring System (CLASS) tool and CLASS Environment tool shall be completed for the classroom.

(2) All children enrolled for 10 or more hours per week shall be evaluated using the Desired Results Developmental Profile, as specified in Section 17702 of Title 5 of the California Code of Regulations.

(3) The classroom shall be taught by a teacher that holds a credential issued by the Commission on Teacher Credentialing in accordance with Section 44065 and subdivision (b) of Section 44256 and who meets the requirements set forth in subdivision (g).

(4) The classroom shall be in compliance with the adult-child ratio specified in subdivision (c) of Section 8241.

(5) Contractors of a school district or charter school commingling children enrolled in the California state preschool program with children enrolled in a transitional kindergarten program classroom shall report the services, revenues, and expenditures for the California state preschool program children in accordance with Section 18068 of Title 5 of the California

AUTHORITY (cont.)

Code of Regulations. Those contractors are not required to report services, revenues, and expenditures for the children in the transitional kindergarten program.

(i) Until July 1, 2019, a transitional kindergarten classroom that has in attendance children enrolled in a California state preschool program shall be licensed pursuant to Chapter 3.4 (commencing with Section 1596.70) of, and Chapter 3.5 (commencing with Section 1596.90) of, Division 2 of the Health and Safety Code.

(j) A school district or charter school that chooses to place California state preschool program children into a transitional kindergarten program classroom shall not also include children enrolled in transitional kindergarten for a second year or children enrolled in kindergarten in that classroom.

(k) A child's eligibility for transitional kindergarten enrollment under paragraph (1) or (2) of subdivision (c) shall not impact family eligibility for a preschool or childcare program, including, but not limited to, all of the following:

(1) A Head Start or Early Head Start program, as defined by the federal Head Start Act, as amended (42 U.S.C. Sec. 9801 et seq.).

(2) A childcare center, family childcare home, or license-exempt provider serving children through an alternative payment program pursuant to Chapter 3 (commencing with Section 10225) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(3) A migrant childcare and development program serving children pursuant to Chapter 6 (commencing with Section 10235) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(4) A childcare center or family childcare home educational network serving children through a California state preschool program pursuant to Article 2 (commencing with Section 8207) of Chapter 2 of Part 6 of Division 1 of Title 1.

(5) A childcare center, family childcare home, or license-exempt provider serving children through a general childcare and development program pursuant to Chapter 7 (commencing with Section 10240) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(6) A family childcare home educational network serving children pursuant to Chapter 8 (commencing with Section 10250) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(7) Childcare and development services for children with special needs pursuant to Chapter 9 (commencing with Section 10260) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(8) A program serving children through a CalWORKs Stage 1, Stage 2, or Stage 3 program pursuant to Chapter 21 (commencing with Section 10370) of Part 1.8 of Division 9 of the Welfare and Institutions Code.

(l)(1) The Superintendent shall authorize California state preschool program contracting agencies to offer less than four hours each instructional day of wraparound childcare services within a part-day California state preschool program for children enrolled in an education program as a transitional kindergarten or kindergarten pupil, if their families meet the requirements of Section 8208.

(2) The Superintendent shall authorize California state preschool programs operating on a local education agency campus to operate a part-day California state preschool program that allows flexibility in the operational hours and enrollment cutoff dates to better align with the enrollment for the new school year.

(3) Notwithstanding the rulemaking provisions of the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government

AUTHORITY (cont.)

Code) and Section 33308.5, until regulations are filed with the Secretary of State to implement this subdivision the department shall implement this subdivision, through management bulletins or similar letters of instruction on or before December 31, 2022.

**EC Section 48010 – Elementary Schools**

(a) A child shall be admitted to the first grade of an elementary school during the first month of a school year if the child will have his or her sixth birthday on or before one of the following dates:

- (1) December 2 of the 2011–12 school year.
- (2) November 1 of the 2012–13 school year.
- (3) October 1 of the 2013–14 school year.
- (4) September 1 of the 2014–15 school year and each school year thereafter.

(b) For good cause, the governing board of a school district may permit a child of proper age to be admitted to a class after the first school month of the school term.

**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 school sites 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 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 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

AUTHORITY (cont.)

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 utilizing the cohort survival enrollment projection system, 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 utilizes 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



AUTHORITY (cont.)

(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).

(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 Section 42268, 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 less, an adjustment in enrollment projections shall not result in a loss of ongoing eligibility to that school district for a period of three years from the date of the approval of eligibility by the board.

**School Facility Program Regulation Section 1859.42. Projecting Non-Special Day Class Enrollment.**

The district enrollment, as reported on the Form SAB 50-01, shall be used to calculate the district's projected enrollment other than Special Day Class enrollment. The OPSC shall use either (a) or (b) to determine the district's projected enrollment:

(a) Fifth-year projected enrollment with the exception of Special Day Class enrollment shall be calculated pursuant to the cohort survival enrollment projection system which is described as follows:

(1) For all grades, using the current and three previous years of enrollment, determine the numerical change in enrollment between the current grade and the next lower grade in the previous year; determine the numerical change in enrollment between the previous year grade and the next lower grade in the second previous year; determine the numerical change in enrollment between the second previous year grade and the next lower grade in the third previous year. Determine the numerical change of kindergarten enrollment on the second previous and third previous year respectively. A district utilizing a fifth-year enrollment projection may calculate the kindergarten enrollment projection in accordance with Section 1859.42.1(b).

(2) Compute the annual change in enrollment as explained in (1) for each grade. The annual change shall then be weighted by multiplying the most recent annual change in enrollment by three, the next most recent annual change by two, and the earliest annual change by

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one, and dividing the sum of the annual weighted changes for each grade by six. The result shall be the average annual change.

(3) Calculate enrollment for each projection year by advancing the enrollment in each grade level through the five-year projection period, modifying the grade progression each year by the average annual change for each grade as computed in (2).

(b) Tenth-year projected enrollment with the exception of Special Day Class enrollment shall be calculated pursuant to the cohort survival enrollment projection system which is described as follows:

(1) For all grades, using the current and seven previous years of enrollment, determine the numerical change in enrollment between:

(A) The current grade and the next lower grade in the first previous year;

(B) The first previous year grade and the next lower grade in the second previous year;

(C) The second previous year grade and the next lower grade in the third previous year;

(D) The third previous year grade and the next lower grade in the fourth previous year;

(E) The fourth previous year grade and the next lower grade in the fifth previous year;

(F) The fifth previous year grade and the next lower grade in the sixth previous year;

(G) The sixth previous year grade and the next lower grade in the seventh previous year;

(H) Determine the numerical change of kindergarten enrollment using the previous year's kindergarten enrollment in place of the next lower grade in the previous year for each step in (A) through (G), respectively.

(2) Compute the annual change in enrollment as explained in (1) for each grade. The annual change shall then be weighted by multiplying the most recent annual change in enrollment by seven, the next most recent annual change by six, the next most recent annual change by five, the next most recent annual change by four, the next most recent annual change by three, the next most recent annual change by two, and the earliest annual change by one, and dividing the sum of the annual weighted changes for each grade by 28. The result shall be the average annual change.

(3) Calculate enrollment for each projection year by advancing the latest enrollment in each grade through the ten-year projection period, modifying the grade progression each year by the average annual change for each grade as computed in (2).

(c) The projected enrollment of a HSAA or Super HSAA shall be computed in the same manner as that set forth in this section, except that the enrollment used in such computation shall be that of the HSAA or Super HSAA rather than the entire district.

# ATTACHMENT C1b

## District A (Small School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK	41	36	30	36
K	157	140	164	125
1	150	157	138	155
2	160	147	154	133
3	161	151	147	158
4	120	163	140	147
5	163	111	157	150
6	145	164	108	159

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	13	15	50	63	55
K	145	158	122	114	120
1	120	145	159	114	113
2	147	130	140	155	111
3	126	148	120	130	148
4	146	139	156	118	131
5	149	159	134	154	121
6	147	148	155	129	160

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous 16/17	2nd Previous (Weighted x 1) 17/18	Previous (Weighted x 2) 18/19	Current (Weighted x 3) 19/20	Average Change / 6	1-year 20/21	2-year 21/22	3-year 22/23	4-year 23/24	5-year 24/25
K	198	176	194	161		147	133	119	105	91
		(22)	36	(99)	-14					
1	150	157	138	155		122	108	94	80	66
		(41)	(76)	(117)	-39					
2	160	147	154	133		151	118	104	90	76
		(3)	(6)	(15)	-4					
3	161	151	147	158		134	152	119	105	91
		(9)		12	1					
4	120	163	140	147		155	131	149	116	102
		2	(22)		-3					
5	163	111	157	150		149	157	133	151	118
		(9)	(12)	30	2					
6	145	164	108	159		150	149	157	133	151
		1	(6)	6	0					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous 16/17	2nd Previous (Weighted x 1) 17/18	Previous (Weighted x 2) 18/19	Current (Weighted x 3) 19/20	Average Change / 6	1-year 20/21	2-year 21/22	3-year 22/23	4-year 23/24	5-year 24/25
TK	41	36	30	36		36	36	36	36	36
		(5)	(12)	18	0					
K	157	140	164	125		111	97	83	69	55
		(17)	48	(117)	-14					
1	150	157	138	155		120	106	92	78	64
			(4)	(27)	-5					
2	160	147	154	133		151	116	102	88	74
		(3)	(6)	(15)	-4					
3	161	151	147	158		134	152	117	103	89
		(9)		12	1					
4	120	163	140	147		155	131	149	114	100
		2	(22)		-3					
5	163	111	157	150		149	157	133	151	116
		(9)	(12)	30	2					
6	145	164	108	159		150	149	157	133	151
		1	(6)	6	0					

# ATTACHMENT C1b

## District B (Large School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK	1,283	1,354	1,278	1,256
K	6,140	6,002	5,859	5,844
1	6,268	6,176	5,980	5,902
2	5,756	6,163	6,119	5,879
3	5,957	5,683	6,032	6,010
4	5,729	5,925	5,598	5,932
5	5,942	5,660	5,819	5,508
6	5,646	5,869	5,545	5,741

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	873	1,047	1,597	2,009	2,277
K	5,159	5,214	5,185	5,057	4,938
1	5,802	5,495	5,490	5,263	5,203
2	5,819	5,756	5,502	5,418	5,322
3	5,795	5,804	5,687	5,408	5,423
4	5,933	5,661	5,740	5,578	5,364
5	5,876	5,812	5,608	5,628	5,559
6	5,475	5,768	5,743	5,513	5,614

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
K	7,423	7,356	7,137	7,100		6,997	6,894	6,791	6,688	6,585
		(67)	(438)	(111)	-103					
1	6,268	6,176	5,980	5,902		5,816	5,713	5,610	5,507	5,404
		(1,247)	(2,752)	(3,705)	-1284					
2	5,756	6,163	6,119	5,879		5,815	5,729	5,626	5,523	5,420
		(105)	(114)	(303)	-87					
3	5,957	5,683	6,032	6,010		5,769	5,705	5,619	5,516	5,413
		(73)	(262)	(327)	-110					
4	5,729	5,925	5,598	5,932		5,926	5,685	5,621	5,535	5,432
		(32)	(170)	(300)	-84					
5	5,942	5,660	5,819	5,508		5,840	5,834	5,593	5,529	5,443
		(69)	(212)	(270)	-92					
6	5,646	5,869	5,545	5,741		5,418	5,750	5,744	5,503	5,439
		(73)	(230)	(234)	-90					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
TK	1,283	1,354	1,278	1,256		1,231	1,206	1,181	1,156	1,131
		71	(152)	(66)	-25					
K	6,140	6,002	5,859	5,844		5,766	5,688	5,610	5,532	5,454
		(138)	(286)	(45)	-78					
1	6,268	6,176	5,980	5,902		5,864	5,786	5,708	5,630	5,552
		36	(44)	129	20					
2	5,756	6,163	6,119	5,879		5,815	5,777	5,699	5,621	5,543
		(105)	(114)	(303)	-87					
3	5,957	5,683	6,032	6,010		5,769	5,705	5,667	5,589	5,511
		(73)	(262)	(327)	-110					
4	5,729	5,925	5,598	5,932		5,926	5,685	5,621	5,583	5,505
		(32)	(170)	(300)	-84					
5	5,942	5,660	5,819	5,508		5,840	5,834	5,593	5,529	5,491
		(69)	(212)	(270)	-92					
6	5,646	5,869	5,545	5,741		5,418	5,750	5,744	5,503	5,439
		(73)	(230)	(234)	-90					

# ATTACHMENT C1b

## District C (Small School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK			28	28
K	164	186	148	133
1	162	125	158	156
2	138	158	129	159
3	143	145	163	134
4	147	145	145	168
5	153	154	148	147
6	150	152	152	157

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	31	32	46	48	64
K	153	144	132	136	132
1	139	155	148	132	145
2	138	132	143	148	128
3	148	134	135	144	148
4	136	140	139	130	139
5	158	135	142	137	129
6	144	160	137	148	141

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)					Projected Enrollment					
Grade	3rd Previous 16/17	2nd Previous (Weighted x 1) 17/18	Previous (Weighted x 2) 18/19	Current (Weighted x 3) 19/20	Average Change / 6	1-year 20/21	2-year 21/22	3-year 22/23	4-year 23/24	5-year 24/25
K	164	186	176	161		154	147	140	133	126
		22	(20)	(45)	-7					
1	162	125	158	156		135	128	121	114	107
		(39)	(56)	(60)	-26					
2	138	158	129	159		157	136	129	122	115
		(4)	8	3	1					
3	143	145	163	134		164	162	141	134	127
		7	10	15	5					
4	147	145	145	168		137	167	165	144	137
		2		15	3					
5	153	154	148	147		171	140	170	168	147
		7	6	6	3					
6	150	152	152	157		151	175	144	174	172
		(1)	(4)	27	4					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)					Projected Enrollment					
Grade	3rd Previous 16/17	2nd Previous (Weighted x 1) 17/18	Previous (Weighted x 2) 18/19	Current (Weighted x 3) 19/20	Average Change / 6	1-year 20/21	2-year 21/22	3-year 22/23	4-year 23/24	5-year 24/25
TK			28	28		37	46	55	64	73
			56		9					
K	164	186	148	133		116	99	82	65	48
		22	(76)	(45)	-17					
1	162	125	158	156		121	104	87	70	53
		(39)	(56)	24	-12					
2	138	158	129	159		157	122	105	88	71
		(4)	8	3	1					
3	143	145	163	134		164	162	127	110	93
		7	10	15	5					
4	147	145	145	168		137	167	165	130	113
		2		15	3					
5	153	154	148	147		171	140	170	168	133
		7	6	6	3					
6	150	152	152	157		151	175	144	174	172
		(1)	(4)	27	4					

# ATTACHMENT C1b

## District D (Medium School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK	337	261	319	236
K	1,669	1,674	1,609	1,738
1	1,687	1,678	1,633	1,634
2	1,549	1,657	1,673	1,629
3	1,700	1,551	1,653	1,663
4	1,609	1,698	1,549	1,674
5	1,836	1,627	1,707	1,535
6	1,646	1,856	1,613	1,711

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	184	243	362	444	578
K	1,577	1,540	1,430	1,431	1,291
1	1,620	1,575	1,620	1,485	1,458
2	1,621	1,630	1,608	1,635	1,495
3	1,605	1,608	1,662	1,606	1,662
4	1,651	1,649	1,619	1,662	1,616
5	1,648	1,655	1,650	1,618	1,661
6	1,529	1,675	1,702	1,651	1,641

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
K	2,006	1,935	1,928	1,974		1,983	1,992	2,001	2,010	2,019
		(71)	(14)	138	9					
1	1,687	1,678	1,633	1,634		1,672	1,681	1,690	1,699	1,708
		(328)	(604)	(882)	-302					
2	1,549	1,657	1,673	1,629		1,625	1,663	1,672	1,681	1,690
		(30)	(10)	(12)	-9					
3	1,700	1,551	1,653	1,663		1,623	1,619	1,657	1,666	1,675
		2	(8)	(30)	-6					
4	1,609	1,698	1,549	1,674		1,673	1,633	1,629	1,667	1,676
		(2)	(4)	63	10					
5	1,836	1,627	1,707	1,535		1,673	1,672	1,632	1,628	1,666
		18	18	(42)	-1					
6	1,646	1,856	1,613	1,711		1,536	1,674	1,673	1,633	1,629
		20	(28)	12	1					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
Grade	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
TK	337	261	319	236		201	166	131	96	61
		(76)	116	(249)	-35					
K	1,669	1,674	1,609	1,738		1,782	1,826	1,870	1,914	1,958
		5	(130)	387	44					
1	1,687	1,678	1,633	1,634		1,738	1,782	1,826	1,870	1,914
		9	(82)	75	0					
2	1,549	1,657	1,673	1,629		1,625	1,729	1,773	1,817	1,861
		(30)	(10)	(12)	-9					
3	1,700	1,551	1,653	1,663		1,623	1,619	1,723	1,767	1,811
		2	(8)	(30)	-6					
4	1,609	1,698	1,549	1,674		1,673	1,633	1,629	1,733	1,777
		(2)	(4)	63	10					
5	1,836	1,627	1,707	1,535		1,673	1,672	1,632	1,628	1,732
		18	18	(42)	-1					
6	1,646	1,856	1,613	1,711		1,536	1,674	1,673	1,633	1,629
		20	(28)	12	1					

# ATTACHMENT C1b

## District E (Large School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK	617	560	589	574
K	4,112	4,158	4,040	4,133
1	4,430	4,323	4,293	4,187
2	4,195	4,291	4,192	4,253
3	4,240	4,070	4,246	4,151
4	4,317	4,139	3,984	4,246
5	4,477	4,240	4,100	3,948
6	4,179	4,403	4,203	4,101

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	470	591	809	912	1,168
K	3,283	3,631	3,442	3,305	3,195
1	4,048	3,743	3,875	3,617	3,462
2	4,088	3,924	3,785	3,834	3,643
3	4,105	3,963	3,895	3,754	3,810
4	4,052	3,990	3,881	3,808	3,731
5	4,139	4,020	3,939	3,819	3,776
6	3,862	4,051	3,958	3,833	3,752

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
K	4,729	4,718	4,629	4,707		4,715	4,723	4,731	4,739	4,747
		(11)	(178)	234	8					
1	4,430	4,323	4,293	4,187		4,277	4,285	4,293	4,301	4,309
		(406)	(850)	(1,326)	-430					
2	4,195	4,291	4,192	4,253		4,100	4,190	4,198	4,206	4,214
		(139)	(262)	(120)	-87					
3	4,240	4,070	4,246	4,151		4,197	4,044	4,134	4,142	4,150
		(125)	(90)	(123)	-56					
4	4,317	4,139	3,984	4,246		4,105	4,151	3,998	4,088	4,096
		(101)	(172)		-46					
5	4,477	4,240	4,100	3,948		4,202	4,061	4,107	3,954	4,044
		(77)	(78)	(108)	-44					
6	4,179	4,403	4,203	4,101		3,924	4,178	4,037	4,083	3,930
		(74)	(74)	3	-24					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
TK	617	560	589	574		567	560	553	546	539
		(57)	58	(45)	-7					
K	4,112	4,158	4,040	4,133		4,148	4,163	4,178	4,193	4,208
		46	(236)	279	15					
1	4,430	4,323	4,293	4,187		4,287	4,302	4,317	4,332	4,347
		211	270	441	154					
2	4,195	4,291	4,192	4,253		4,100	4,200	4,215	4,230	4,245
		(139)	(262)	(120)	-87					
3	4,240	4,070	4,246	4,151		4,197	4,044	4,144	4,159	4,174
		(125)	(90)	(123)	-56					
4	4,317	4,139	3,984	4,246		4,105	4,151	3,998	4,098	4,113
		(101)	(172)		-46					
5	4,477	4,240	4,100	3,948		4,202	4,061	4,107	3,954	4,054
		(77)	(78)	(108)	-44					
6	4,179	4,403	4,203	4,101		3,924	4,178	4,037	4,083	3,930
		(74)	(74)	3	-24					



# ATTACHMENT C1b

## District F (Medium School District)

### Actual TK-6 Pupil Data from CDE's DataQuest

Actual Enrollment				
Grade	16/17	17/18	18/19	19/20
TK	236	167	258	243
K	1,177	1,188	1,139	1,108
1	1,217	1,169	1,075	1,083
2	1,161	1,164	1,129	1,005
3	1,184	1,161	1,129	1,060
4	1,213	1,177	1,144	1,053
5	1,215	1,188	1,162	1,087
6	1,094	1,115	1,098	999

Actual Enrollment					
Grade	20/21	21/22	22/23	23/24	24/25
TK	117	184	229	318	425
K	976	931	900	763	795
1	1,057	976	925	909	839
2	1,050	1,022	975	920	885
3	986	1,006	998	922	922
4	1,034	926	967	961	909
5	1,031	981	897	923	953
6	1,053	979	905	865	842

### K-6 Projected Enrollment (Current Method)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
Grade	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
K	1,413	1,355	1,397	1,351		1,332	1,313	1,294	1,275	1,256
		(58)	84	(138)	-19					
1	1,217	1,169	1,075	1,083		1,060	1,041	1,022	1,003	984
		(244)	(560)	(942)	-291					
2	1,161	1,164	1,129	1,005		1,026	1,003	984	965	946
		(53)	(80)	(210)	-57					
3	1,184	1,161	1,129	1,060		959	980	957	938	919
			(70)	(207)	-46					
4	1,213	1,177	1,144	1,053		1,015	914	935	912	893
		(7)	(34)	(228)	-45					
5	1,215	1,188	1,162	1,087		1,015	977	876	897	874
		(25)	(30)	(171)	-38					
6	1,094	1,115	1,098	999		959	887	849	748	769
		(100)	(180)	(489)	-128					

### TK-6 Projected Enrollment (Proposed TK & K Linear)

Cohort Projection (Weight Change x1, x2, x3)						Projected Enrollment				
	3rd Previous	2nd Previous (Weighted x 1)	Previous (Weighted x 2)	Current (Weighted x 3)	Average Change / 6	1-year	2-year	3-year	4-year	5-year
Grade	16/17	17/18	18/19	19/20		20/21	21/22	22/23	23/24	24/25
TK	236	167	258	243		254	265	276	287	298
		(69)	182	(45)	11					
K	1,177	1,188	1,139	1,108		1,078	1,048	1,018	988	958
		11	(98)	(93)	-30					
1	1,217	1,169	1,075	1,083		1,041	1,011	981	951	921
		(8)	(226)	(168)	-67					
2	1,161	1,164	1,129	1,005		1,026	984	954	924	894
		(53)	(80)	(210)	-57					
3	1,184	1,161	1,129	1,060		959	980	938	908	878
			(70)	(207)	-46					
4	1,213	1,177	1,144	1,053		1,015	914	935	893	863
		(7)	(34)	(228)	-45					
5	1,215	1,188	1,162	1,087		1,015	977	876	897	855
		(25)	(30)	(171)	-38					
6	1,094	1,115	1,098	999		959	887	849	748	769
		(100)	(180)	(489)	-128					



# ATTACHMENT C1b

## K-6 Projection vs. TK-6 Projection vs. Actual Enrollment Data Fifth-Year Projections

### District A (Small School District)

#### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	1,008	948	875	780	695

#### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	1,006	944	869	772	685

#### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	993	1,042	1,036	977	959

#### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	101.51%	90.98%	84.46%	79.84%	72.47%
TK-6	101.31%	90.60%	83.88%	79.02%	71.43%

### District B (Large School District)

#### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	41,581	41,310	40,604	39,801	39,136

#### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	41,629	41,431	40,823	40,143	39,626

#### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	40,732	40,557	40,552	39,874	39,700

#### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	102.08%	101.86%	100.13%	99.82%	98.58%
TK-6	102.20%	102.15%	100.67%	100.67%	99.81%

### District C (Small School District)

#### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	1,069	1,055	1,010	989	931

#### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	1,054	1,015	935	869	756

#### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	1,047	1,032	1,022	1,023	1,026

#### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	102.10%	102.23%	98.83%	96.68%	90.74%
TK-6	100.67%	98.35%	91.49%	84.95%	73.68%

# ATTACHMENT C1b

## District D (Medium School District)

### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	11,785	11,934	11,954	11,984	12,063

### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	11,851	12,101	12,257	12,458	12,743

### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	11,435	11,575	11,653	11,532	11,402

### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	103.06%	103.10%	102.58%	103.92%	105.80%
TK-6	103.64%	104.54%	105.18%	108.03%	111.76%

## District E (Large School District)

### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	29,520	29,632	29,498	29,513	29,490

### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	29,530	29,659	29,549	29,595	29,610

### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	28,047	27,913	27,584	26,882	26,537

### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	105.25%	106.16%	106.94%	109.79%	111.13%
TK-6	105.29%	106.26%	107.12%	110.09%	111.58%

## District F (Medium School District)

### K-6 Projected Enrollment (Current Methodology)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	7,366	7,115	6,917	6,738	6,641

### TK-6 Projected Enrollment (Proposed Methodology - TK & K Linear)

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	7,347	7,066	6,827	6,595	6,436

### Actual Enrollment Data from DataQuest

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
TK-6	7,304	7,005	6,796	6,581	6,570

### Percentage of Actual

	1-Year	2-Year	3-Year	4-Year	5-Year
	20/21	21/22	22/23	23/24	24/25
K-6	100.85%	101.57%	101.78%	102.39%	101.08%
TK-6	100.59%	100.87%	100.46%	100.21%	97.96%



July 7, 2025

Joshua Potter, Operations Manager  
Office of Public School Construction  
707 Third Street  
West Sacramento, CA 95605

Subject: Recommendations for Processing Small District Set-Aside Funds

Joshua:

We respectfully submit the following recommendations to improve the effectiveness and accessibility of the Small School District Set-Aside Funds within the School Facility Program (SFP). These recommendations reflect the unique challenges faced by California's smallest and most rural school districts.

**Use of New Construction Eligibility on File:**

We recommend that the Office of Public School Construction (OPSC) allow districts to utilize new construction eligibility that is already on file but has not yet been formally processed by OPSC for the purpose of processing a Small District Set-Aside application.

Example:

If a district's Small District Set-Aside application is being processed in fiscal year 2025–26 and has unprocessed new construction eligibility from 2023–24, the district should be allowed to use eligibility from either year, consistent with current SFP practices. This continued practice would align the five-year eligibility lock with the five-year window required to obtain Division of the State Architect (DSA) and California Department of Education (CDE) approvals.

**Flexibility for Previously Approved Design Apportionments:**

Districts who have received a design apportionment but have not yet secured DSA or CDE approvals may be unfairly disadvantaged if they are ineligible to enter the Small District Set-Aside funding queue until those milestones are met or a new preliminary apportionment application is submitted.

Recommendation:

We propose that OPSC establish a clearly defined process for allowing districts with previously approved design apportionments to transition into the Small District Set-Aside funding queue within a reasonable and practical timeframe, to be determined after further discussion at Stakeholder meetings. Providing this flexibility would preserve prior state investments in project design and help small districts move forward toward full project implementation.

We appreciate your time and thoughtful consideration of these recommendations. We remain committed to working in collaboration with OPSC to ensure the Small School District Set-Aside Fund effectively supports California's smallest and some of the most underserved school communities.

Sincerely,

Elona S. Cunningham



**July 9, 2025**

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

**Re: SSDA Comments on Proposition 2 – Small School District Program  
Regulations; June 26, 2025 Stakeholder Meeting**

Dear Ms. Kirk and Members of the OPSC Team,

On behalf of the Small School Districts' Association (SSDA), representing over 600 small school districts across California, I want to express our sincere appreciation for the Office of Public School Construction's (OPSC) leadership and responsiveness in developing the Proposition 2 Small School District Program. The process you have undertaken, characterized by openness, transparency, and proactive stakeholder engagement, stands in stark contrast to how small school districts have historically experienced state school facilities policymaking.

**Longstanding Barriers for Small School Districts**

For decades, small school districts in California have been systematically disadvantaged in their ability to access state facilities funding. Unlike larger districts with dedicated facilities departments, external bond counsel, grant writers, and specialized consultants, small districts typically rely on one or two overburdened administrators—often the superintendent—who juggle every operational responsibility, from curriculum to transportation to human resources.

Many of these districts have never received a single dollar of School Facility Program (SFP) funding for new construction or modernization. In fact, for hundreds of small districts, the time since their last access to state facilities funding exceeds 25 years—the same length of time used to define modernization eligibility under the SFP.



These barriers are not due to lack of need. They are the result of an overly complex application process, rigid eligibility requirements, and a system that has historically favored well-resourced districts with lobbying power and technical capacity.

**Strong Support for the 180-Day Priority Application Window and the 25-Year Eligibility Threshold**

We want to state in the strongest possible terms our full and unwavering support for the proposed 180-calendar day priority application window for small school districts that have not previously received SFP funding for new construction or modernization projects.

Given opposition from organizations that primarily represent districts already in the funding queue, we feel compelled to emphasize that this priority window is one of the most essential equity provisions OPSC has proposed in decades, addressing systemic exclusion.

This is not about queue jumping. It is about finally offering access to districts that, because of systemic disadvantages, were never in the queue to begin with.

We strongly recommend that OPSC define the threshold for eligibility for this priority window as districts that have not received state SFP new construction or modernization funding for at least 25 years.

This 25-year benchmark is both symbolically and operationally appropriate, as it directly aligns with the state's own modernization eligibility timeline under the SFP. By setting the window at 25 years, OPSC would ensure that the districts with the most deferred facilities needs and longest-standing exclusion from the program are given first priority during this critical application window.

We are aware that some organizations have voiced opposition to this window. Their arguments, while understandable from the perspective of protecting their existing client base, fail to acknowledge the critical fact that small school districts have historically lacked the capacity and resources even to enter the line in the first place.

The 180-day window is not about queue jumping. It is about finally giving small, rural, and often impoverished districts a realistic chance to access state resources that, by design, were always intended to serve all California schools, not just those with professional facilities teams and consultants.

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## **SSDA Recommendations on Specific Regulatory Areas**

### **1. Oversubscription and Dual List Placement**

We strongly encourage OPSC to consider maintaining unfunded small school projects on both:

- A new list, the **Small School District Program Workload Beyond Bond Authority List**, and
- The existing **SFP “Applications Received Beyond Bond Authority” (ARBBA) list**,

with each district retaining its place on each list based on the application date applicable to each list (original filing date or date of Small School Program submission, whichever applies).

We also strongly support the proposal of OPSC to allow districts to move back to their original position on the regular SFP list if the Small School Program runs out of funds.

We further support OPSC’s clarification that this dual list placement applies only to new construction and modernization projects under the Small School District Program.

### **2. Clarifying Eligibility for Districts with Prior Hardship-Only Funding**

We recommend that OPSC explicitly state in regulation that small districts that have only previously received funding through the SFP Facility Hardship Program—but have never received a state-funded new construction or modernization grant—remain fully eligible to participate in the 180-day priority window.

Many small districts, in moments of emergency (such as natural disasters, health and safety failures, or structural deficiencies), may have been able to access small, one-time hardship grants that allowed them to address a singular issue. However, these districts have still never received full state funding for a modernization or new construction project, and they remain among the most underserved in the state.

Excluding them now would perpetuate historical inequities. Their prior facility hardship funding status should not disqualify them from this critical equity-driven priority period.



### **3. Flexibility for Existing Design-Only and SFP Workload Projects**

We urge OPSC to remove the proposed 45-day limit on transitioning existing design-only or unfunded SFP workload list projects into the Small School District Program ***after the close of the 180-day window.***

The administrative and governance structures in small districts make compliance with short procedural windows especially challenging. Superintendents in these districts often oversee multiple job functions and may not have immediate board authority or capacity to respond to compressed timelines for application changes. Moreover, we do not believe that limiting movement for a small school district to a specific period serves any broader purpose. The objective of the small school program is to ensure these funds are spent on small school district projects.

We recommend that any eligible small school district with an active project on the SFP workload list—whether design-only or full funding—be permitted to transition into the Small School District Program at any time following the initial 180 day period for school districts that have not participated in the SFP program, as long as program funds remain available.

This ongoing flexibility is vital to ensuring that no small district misses this opportunity simply because of staffing or capacity constraints. Flexibility is equity in this context.

#### **Additional Recommendations**

In addition to the three areas raised for comment, we encourage OPSC to also consider the following enhancements:

- **Continue to streamline application documentation and eligibility updates for small districts.**
- **Provide targeted technical assistance funding to help small districts prepare and submit applications.**
- **Clarify Project and Construction Management Grant implementation so small districts can effectively utilize these funds for outside expertise.**

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In summary, the Small School District Program, and especially the proposed 180-day priority window, is a once-in-a-generation opportunity to bring long-overdue state facilities funding to California's smallest, most rural, and most underserved school districts.

We urge OPSC to remain steadfast in your commitment to access, equity, and inclusion as you finalize these important regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Yuri Calderon", written over a solid black rectangular background.

**Yuri Calderon**

Executive Director

Small School Districts' Association



July 11, 2025

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

**Subject: Proposition 2 Stakeholder Comments – Small School District Program**

Dear Ms. Kirk:

The Coalition for Adequate School Housing (CASH) appreciates the opportunity to provide feedback on the implementation of Proposition 2, the 2024 state school bond. This letter addresses the Small School District Program item presented by the Office of Public School Construction (OPSC) at the Stakeholder Meeting on June 26, 2025.

Proposition 2 established the new Small School District Program, which uses a preliminary apportionment structure to reserve bond authority for projects at small school districts with enrollment of fewer than 2,501 pupils. The State Allocation Board previously reserved \$400 million for Modernization and \$330 million for New Construction for the Small School District Program. CASH actively supported this provision during the development of AB 247, which placed Proposition 2 on the November 2024 ballot. This program will be particularly helpful for Financial Hardship districts that submit a separate “Design-Only” request followed by a subsequent adjusted grant application, as it will ensure bond authority is available when the small school district completes planning and has a shovel-ready project. Such districts require the assistance of the state in order to prepare architectural plans for approval by the Division of the State Architect.

*Priority Application Filing Periods*

The agenda item for the June 26 stakeholder meeting includes a new recommendation to establish three priority application submission windows for a Preliminary Small School District Program Apportionment. Specifically, OPSC proposes:

“[...] an application filing period of 180 calendar days following approval of the Program regulations by the Office of Administrative Law that would allow only small school districts who have either never participated in the SFP new construction or modernization programs, or have not participated in either program for a to-be-determined amount of time, to apply to the Program and receive priority at the top of the Program’s workload list by date order received of an Approved Application.”

CASH respectfully *opposes* this recommendation. This proposal would prioritize a subset of eligible projects at some small school districts over eligible projects at other small school districts, which was not the intent of AB 247 or Proposition 2. OPSC’s proposal would prioritize projects that exist only in concept before eligible, shovel-ready projects that have already been submitted to OPSC.

At the April 17, 2025 stakeholder meeting, OPSC staff presented options for how a school district could transfer a funding application that is currently on the School Facility Program (SFP) Workload List or

## ATTACHMENT D

the Applications Received Beyond Bond Authority (ARBBA) List to the future Small School District Program Workload List. These are the very applications that would be disadvantaged by OPSC's June 26 Priority Application Filing Period proposal. The following eligible small district projects would be negatively impacted by this proposal:

- Separate Design-Only (Financial Hardship) applications on the Workload List. Such projects are within bond authority, but only for the advance Design funding. If they are not able to convert to the Small School District Program, it is unlikely these projects will receive construction funding under Proposition 2 and would require a future funding source to be built.
- Projects on the ARBBA List, including Separate Design-Only (Financial Hardship) as well as Adjusted Grant (full funding) applications. If they are not able to convert to the Small School District Program, they would require a future funding source to be built. Adjusted Grant requests are shovel-ready and have approval from both the Division of the State Architect and the California Department of Education.

All small school districts face barriers related to their size and limited access to resources. OPSC's June 26 proposal would negate the work that has already been completed by small districts to plan projects and prepare application documents for eligible projects that are critical to the education and safety of their students. School districts and their students should not be punished because they proceeded with development of vital projects using the SFP guidelines in place upon passage of Proposition 2. Such districts operated with constrained resources, time, and funding, just like all small districts; they should not be penalized for proactive efforts to serve their students and communities.

*CASH supports* the concepts proposed at the April 17 Stakeholder meeting, which would provide a window of time for small school district projects on the Workload and ARBBA list to choose to convert to the Small School District Program. *CASH supports* processing applications based on the date of submittal, which ensures predictability and an even playing field for all districts with eligible applications. *CASH opposes* creating a separate application filing window that would prioritize new applications at the expense of applications that have already been submitted.

We thank you for the opportunity to provide these thoughts for your consideration, and we look forward to further collaboration.

Sincerely,

Rebekah Kalleen  
CASH Legislative Advocate

cc: Michael Watanabe, Deputy Executive Officer, Office of Public School Construction  
Brian LaPask, Chief of Program Services, Office of Public School Construction

## ATTACHMENT E

**From:** Ken Reynolds <[ken@schoolworksgis.com](mailto:ken@schoolworksgis.com)>

**Sent:** Thursday, February 20, 2025 10:41 AM

**To:** DGS OPSC-Communications <[OPSCCommunications@dgs.ca.gov](mailto:OPSCCommunications@dgs.ca.gov)>; Watanabe, Michael@DGS <[Michael.Watanabe@dgs.ca.gov](mailto:Michael.Watanabe@dgs.ca.gov)>

**Cc:** LaPask, Brian@DGS <[Brian.LaPask@dgs.ca.gov](mailto:Brian.LaPask@dgs.ca.gov)>; Ly, Candace@DGS <[Candace.Ly@dgs.ca.gov](mailto:Candace.Ly@dgs.ca.gov)>; Faust, Maria@DGS <[Maria.Faust@dgs.ca.gov](mailto:Maria.Faust@dgs.ca.gov)>; Potter, Joshua@DGS <[Joshua.Potter@dgs.ca.gov](mailto:Joshua.Potter@dgs.ca.gov)>

**Subject:** Re: Prop 2 stakeholder meeting #3

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

Good morning.

Thanks for the information shared today.

### **Second Round of Modernization**

For the first topic, does a district need to do anything to request the second round of modernization? Will there be a new form to request the eligibility or will there be a check box on the 50-04 to request the second round funding increase?

I would also ask that for the modernization projects that went through the RCI process, that they should get those few grants back after 25 years.

I am not sure if I fully understand the true impacts of how this is being implemented. Here is my concern: If a school did a previous modernization project that used 500 grants and it is now 25 years later, they should be able to use the 500 grants again. However, I am not sure that is exactly true based on the item you presented. If the school had only permanent building, this that statement would be accurate. However, if 4 of the classrooms were portables then 100 of those 500 grants are only available if the district plans to replace those with new classrooms. That is how I am understanding the item. But what if the current project does not touch those portables, then they will only have access to the 400 grants? I know this is a specific (and simple) situation, but is that the way this is being implemented?

### **TK Enrollment & Projections**

I do have some comments on the second item regarding the TK enrolment projections. As you may know I do demographic studies for school districts so they can have accurate enrolment projections for their planning purposes. I appreciate all the methods that were considered and acknowledge how challenging it is as this time when the TK program is still in the process of expanding to all 4 year olds. The projections I do for schools are typically within 1% or less of the actual enrolments. I spent a lot of time trying our best to predict the impact of TK enrollments and as you have seen, the number vary from one district to the other. Of the options you have shared, I think Option 1 will be the most accurate projection once the TK program is finished with the transition process. So, for the long term this would be best understanding that there may be some variances in the short term.

The other option that looks like it would be very accurate is option 6 where you project TK numbers the same way as SDC. We would see an increase in TK if the district is growing and a drop if the district is declining. Since this new method would not go into effect until we have the enrollment data for the fall of 2025, TK will already be open to all 4 year olds.

## ATTACHMENT E

So, if you are looking for an accurate method, which I would think you are, then those two options are best.

As you saw during the meeting, these options will probably not be the ones that generate the most new construction eligibility, but that should not be the goal.

Thanks again for all the work you put into these items.

Ken Reynolds  
SchoolWorks



**Alberto M. Carvalho**  
Superintendent

**Los Angeles Unified School District**  
Legislative Affairs & Government Relations

Sacramento Office: 1201 K St., Suite 1040  
Sacramento, CA 95814  
Administrative Office: 333 S. Beaudry Ave., 24th Floor  
Los Angeles, CA 90017  
Phone: (916) 443-4405

**Board of Education**

Scott M. Schmerelson, President  
Dr. Rocío Rivas, Vice President  
Sherlett Hendy Newbill  
Nick Melvoin  
Karla Griego  
Kelly Gonez  
Tanya Ortiz Franklin

March 7, 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 #3**

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 Schol Facility Program in response to Proposition 2.

The comments and recommendations provided below correspond to the topics raised and materials provided for the February 20, 2025, Implementation Stakeholder Meeting #3.

**Modernization Grant for Facilities Previously Modernized with State Funds**

*Proposal for Further Discussion*

Los Angeles Unified would like to thank OPSC for the thoughtfully proposed methodology to handle the implementation of the modernization grants for facilities that were previously modernized with state funds. However, review of the documentation provided indicates there continues to be a need for further discussion and clarification around this topic.

At the time of the 2004 implementation committee meetings, school districts were dealing with increasing enrollment, aging facilities and navigating a new state funding program. The decisions

made by the committee were reflective of the needs of school districts at the time. Twenty years later, school districts continue to deal with aging facilities, but this is now paired with declining enrollment which impacts their ability to allocate funds for needed site and facility improvements.

While the implementation committee recognized the need to provide age parameters around regeneration of modernization pupil grants (Education Code Section 17073.15), it did not define the method for calculating eligibility regeneration. The text of EC 17074.10(f) infers that modernization pupil usage (apportionment) and work funded, would be linked to a building, like the Lease Purchase Program (LPP) and Seismic Mitigation Program (SMP). In the case of LPP and SMP, an apportionment was provided for the rehabilitation or replacement of a specific building, and the age and eligibility of that building is reset to the SAB-approved apportionment date, thus restarting that building's ability to generate eligibility.

This contrasts with how the modernization program has been implemented over the last 25 years, where modernization apportionments can be used for a site's needs. Whether it be system, site, building, or other improvement, a district could utilize modernization funds without eligibility being tied to a particular building. It would be very difficult to now try and attach pupils to specific buildings, especially in cases where previous apportionments were for site-wide improvements. The difficulty of this task is evidenced even by OPSC's own proposed calculations that use a ratio of eligible permanent and portable buildings rather than try to allocate pupils to a specific building based on a previously apportioned project's scope of work.

Los Angeles Unified proposes that OPSC convene an implementation committee to discuss the calculation and usage of second round eligibility. The committee would discuss the impacts of limiting second round funding to the portable(s) generating the eligibility, how to best calculate regenerated pupils, whether it should be based on a permanent-to-portable ratio or other method, and identify what Education Code and 2 CCR changes would be needed to support the outcome of these discussions. This conversation is especially critical given that OPSC has already begun implementing the calculation method specified in the stakeholder materials in recent day letters without full discussion in stakeholder meetings.

### *Tracking Second Round Modernization Eligibility*

OPSC has indicated that second round eligibility will be added to a site's eligibility. Los Angeles Unified requests clarification on how OPSC will track the differences between first and second round portable and permanent eligibility since OPSC has proposed that second round portable eligibility has restricted use. Los Angeles Unified requests clear examples of tracking in future stakeholder materials.

### *Use of Second Round Modernization Eligibility for Submitted Applications*

OPSC has stated in stakeholder materials and meetings that it will track the return of pupil grants and reinstate them into the eligibility baseline once they reach the appropriate age determined by the apportionment date of previous funding applications. However, in recent day letters received, OPSC indicated that the return of pupil grants for second round modernization of portable classrooms is

subject to SAB approval. Los Angeles Unified seeks clarification on which date will determine when the pupil grants become available for use—25 or 20 years from the apportionment date, or the date when the SAB approves their return.

Lastly, since districts could have received a modernization apportionment as early as 1999, this discussion comes six years too late for portables that should have already regenerated eligibility and one year too late for permanent buildings that should have done so. Therefore, Los Angeles Unified requests that OPSC allow districts to incorporate second-round pupils at the time a current application is processed by permitting an increase in requested pupil grants, provided the application still meets the 60% commensurate test.

We further request that this provision be applied retroactively to any unprocessed application that had second-round pupils available for use at the time of submittal. Allowing districts to modify their pupil grant requests upward to include second-round funding pupils is a fair solution to the lack of timely information, methodology, and regulation. Additionally, because existing regulations prohibit upward modifications to an application's pupil grant request, Los Angeles Unified requests regulatory changes to allow this adjustment.

### **Evaluation of Transitional Kindergarten Pupils in School Facility Program Enrollment Projection**

The full implementation of transitional kindergarten is expected in the 2025-26 school year, when all 4-year-olds will be eligible, and all districts—except charter schools—will be required to offer it. Since the phased implementation is still ongoing, selecting a methodology now would be premature, as its impact on a district's ability to request funding remains uncertain. Los Angeles Unified recommends continuing discussions on this topic and providing additional analysis on how different enrollment projection methods align with actual enrollment trends and needs.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Sasha Horwitz", with a horizontal line extending from the end of the signature.

Sasha Horwitz  
Legislative Advocate  
Los Angeles Unified School District

## ATTACHMENT E

**From:** Rob Murray <[rob@kinginc.com](mailto:rob@kinginc.com)>

**Sent:** Friday, March 7, 2025 11:50 AM

**To:** DGS OPSC-Communications <[OPSCCommunications@dgs.ca.gov](mailto:OPSCCommunications@dgs.ca.gov)>

**Subject:** Feedback on Options for TK Students in SFP Enrollment Projections

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

Hello,

Thank you for providing several options for how TK students can be independently projected for SFP New Construction enrollment projections.

After reviewing the options using data from several school districts, I believe **Option 1** represents the best path forward.

For as long as TK remains non-compulsory, it will be important to treat it as its own distinct population. Any projection option that uses TK enrollment to directly calculate future kindergarten enrollment via cohort survival is extremely flawed, in my opinion, and should not be considered. For this reason, I also strongly advise against Options 2 and 4.

The current methodologies for calculating kindergarten (which can also be done using local or county births) work well, and with nearly 30 years now of precedent, there does not seem to be any need to alter this. Calculating future TK in the same way seems the most obvious way forward.

I also believe using actual historical TK enrollments is much better than estimating what TK might have been as is proposed in Option 3. While this has appeal in our immediate context in the middle of TK expansion, the regulations adopted need to work well now and for all future years. In just a few years, once TK is fully implemented for all four year olds, there will be no point in estimating TK instead of simply using the actual enrollments. Avoiding this option also avoids more work integrating new calculations into the projections calculator.

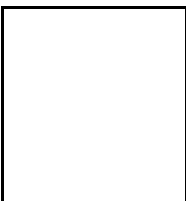
Finally, Option 5 also keeps TK distinct without altering current kindergarten methodology. My only objection to this option is the relative complexity and alteration to the Form 50-01 compared to what will be accomplished more easily with Option 1.

In summary, **Option 1** is my preference for the future of SFP enrollment projections, and I have particular concerns with Options 2 and 4.

Thank you, and please let me know if there is any other information I can provide.

Best regards,

Rob



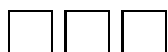
**Rob Murray**

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## ATTACHMENT E



March 7, 2025

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

**RE: FEEDBACK ON TOPICS PRESENTED DURING FEBRUARY 20, 2025 STAKEHOLDER MEETING  
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 third Implementation meeting of the year, held on February 20, 2025. Below is a summary of our comments and concerns:

- **Modernization Grants for Facilities Previously Modernized with State Funds**
  - We appreciate OPSC clarifying that the replacement *does not* need be a permanent facility, as noted was the requirement a few times in the stakeholder meeting item.
  - We have seen a number of instances of a district replacing a portable classroom eligible for second round funding with a different usage, assuming classroom space is no longer needed. In these situations we encourage the possibility of OPSC allowing that replacement-in-kind to be considered “a better use of public resources”, as certified to by the district. With statewide K-12 enrollment currently declining, many districts are needing to now re-evaluate their spaces and make the decisions that are best for their student population – classroom space is often less needed now than it was in 2003 when this law came into effect. Enrollment has dropped by 6% just in the last 10 years; schools that once needed 16 classrooms may now only need 15 classrooms.
  - If the regulations are changed in the future to allow a replacement-in-kind in lieu of a replacement classroom, we would appreciate the ability to re-instate any funding application(s) which was previously returned to a district due to OPSC’s current interpretation of the application not meeting the current statute and SFP regulations.
  - A flowchart or similar type of visual would be greatly appreciated when trying to evaluate if and when certain facilities are eligible to generate second round eligibility, and if and when certain *projects* are then eligible to utilize the funding from second round eligibility.

## ATTACHMENT E

### • Evaluation of Transitional Kindergarten (TK) Pupils in SFP Enrollment Projections

- We understand that OPSC used actual enrollment data from 2019/20 to 2021/22 in order to test various versions of the 50-01 form projection calculations. We believe it would be really beneficial to see more current data used in these various calculations, including from 2022/23 and forward, when the Universal TK (AB 130) program was being phased in, and TK enrollment was starting to increase.
  - If allowed, HPD staff would love have access to the spreadsheets OPSC used for testing, in order to “play around with the numbers” further.
  - Below are the six calculation options tested by OPSC, with our comments and concerns:
- 1) TK & Kinder Linear Weighted Average + 1<sup>st</sup>-12<sup>th</sup> Cohort Survival method, with actual TK Enrollment (new row on 50-01 form)
    - 2 districts increased, 4 districts decreased; 0% average change; isolates & minimizes TK change/impacts.
    - HPD is in favor of this option.
  - 2) TK Linear Weighted Ave + K-12<sup>th</sup> Cohort Survival method, with actual TK Enrollment (new row on 50-01 form)
    - Drastic average 171% increase to projections; creates false inflation with data used, but with more current, higher enrollment, the changes would likely be less drastic.
    - HPD is in favor of this option, with more analysis.
  - 3) TK & Kinder Linear Weighted Ave + 1<sup>st</sup>-12<sup>th</sup> Cohort Survival, TK Enrollment calculated similar to FDK with a 3-year average (new row on 50-01 form).
    - Average +10.5% increase to 6 districts; doesn't use actual enrollment; minimizes fluctuations in TK.
    - HPD does not support this option due to actual enrollment not being used.
  - 4) TK Linear Weighted Ave + K-12<sup>th</sup> Cohort Survival method, TK Enrollment similar to FDK with a 3-year average (new row on 50-01 form)
    - Average -8.5% decrease in projections; likely inaccurate representation of actual need.
    - HPD does not support this option due to actual enrollment not being used.
  - 5) Separate TK Projection From Existing K-12 Projection, apply SDC projection methodology to Actual TK Enrollment (NO new row on 50-01 form)
    - 2 districts increased, 4 districts decreased; -0.2% average change; SDC & TK both variable groups; seems to be a less accurate projection method, doesn't account for year-over-year trends.
    - HPD does not support this option.
  - 6) TK/K Linear Weighted Ave + 1<sup>st</sup>-12<sup>th</sup> Cohort Survival method (NO new row on 50-01 form, no change to calculation)
    - Results n/a; shows false dip between K & 1<sup>st</sup> grade, which seems unfair and inaccurate.
    - HPD does not support this option.

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 E

**From:** Gary Gibbs <[gibbsasc@aol.com](mailto:gibbsasc@aol.com)>

**Sent:** Tuesday, March 11, 2025 11:07 AM

**To:** Watanabe, Michael@DGS <[Michael.Watanabe@dgs.ca.gov](mailto:Michael.Watanabe@dgs.ca.gov)>; LaPask, Brian@DGS <[Brian.LaPask@dgs.ca.gov](mailto:Brian.LaPask@dgs.ca.gov)>

**Subject:** Re: Eligibility Projection (50-0) Changes - Impact on existing Applications

You don't often get email from [gibbsasc@aol.com](mailto:gibbsasc@aol.com). [Learn why this is important](#)

**CAUTION:** This email originated from a NON-State email address. Do not click links or open attachments unless you are certain of the sender's authenticity.

Thanks Brian,

Your summary is very helpful and I think your strategy of separating TK from K makes a lot of sense.

In terms of implementation, to keep it simple and ensure districtwide support, my thought is to: (a) either implement the program prospectively for future applications; or, (b) if you think it best for all applications to be included in new methodology, then for those applications that during your review process that were filed prior to implementation of the new eligibility program and can clearly show you they will lose eligibility to extent that funding will be jeopardized then allow the district to base eligibility (for only the specific project) on old eligibility methodology.

Gary

On Tuesday, March 11, 2025 at 10:11:23 AM PDT, LaPask, Brian@DGS <[brian.lapask@dgs.ca.gov](mailto:brian.lapask@dgs.ca.gov)> wrote:

Good Morning,

Moving TK to its own grade category could actually help in a lot of ways too, it's really dependent on the enrollment of a given district. Right now TK is reported along with Kindergarten, so the K row on the 50-01 is essentially two grade levels worth of enrollment currently. Only roughly half of those kids move to 1<sup>st</sup> grade next year. So that could show a *decrease* going from K to 1<sup>st</sup> grade, which could negatively impact your projection. The flip side of that, is the elevated K enrollment that also includes TK could inflate the isolated K projection. So it's hard to say if the inflated K projection offsets the negatively impacted trend that is created by only half of the TK/K kids being reported in the K row on the 50-01 moving to 1<sup>st</sup> grade.

So it really depends on the individual district and is going to vary from district to district. In my mind, that makes it appropriate and logical to make TK its own grade category as we have proposed, and to look at the TK and K rows in an isolated fashion, thus projecting those two grade levels in a linear and isolated manner, and also in the process smoothing out the transition from K to 1<sup>st</sup> grade enrollment by removing the TK from the K row and not having the sudden decrease that it creates.

**Brian LaPask | Chief, Program Services**  
**California Department of General Services**  
Interagency Support Division – Office of Public School Construction  
Direct: 279.946.8434



## ATTACHMENT E

**From:** Gary Gibbs <[gibbsasc@aol.com](mailto:gibbsasc@aol.com)>  
**Sent:** Tuesday, March 11, 2025 10:03 AM  
**To:** LaPask, Brian@DGS <[Brian.LaPask@dgs.ca.gov](mailto:Brian.LaPask@dgs.ca.gov)>; Watanabe, Michael@DGS <[Michael.Watanabe@dgs.ca.gov](mailto:Michael.Watanabe@dgs.ca.gov)>  
**Subject:** Re: Eligibility Projection (50-0) Changes - Impact on existing Applications

**CAUTION:** This email originated from a NON-certain of the sender's authenticity.

Hi Michael,

As you navigate modifying the Eligibility Projection Methodology (50-01), given that applications might now take 4 years to review/fund, how will you deal with applications submitted under the current projection method process as many districts might be negatively impacted by the changes.

My two thoughts, although look forward to your words of wisdom as this is a very complicated issue, is that any changes to 50-01 be prospective (say 2025/2026 school year and beyond) or give district the option of using new or old method.

I do agree with you that the methodology needs to be updated given TK fully implemented this year. Just glad I am not the one trying to figure out the best approach.

Good luck.

Gary