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Riverside County K-12 School Districts

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Perris Union High SD
Riverside USD
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Temecula Valley USD
Val Verde USD

September 4, 2018

The Honorable Edmund G. Brown, Jr.
Governor, State of California
State Capitol, First Floor
Sacramento, CA 95814

RE: Senate Bill 328 (Portantino) Pupil Attendance: School Start Time

Position: Request for Veto

Dear Governor Brown:

On behalf of the Riverside County Superintendent of Schools, we are writing to respectfully request that you veto Senate Bill 328 (Portantino). The bill would prohibit middle schools and high schools, including those operated as charter schools, from beginning their school day before 8:30 a.m. The bill would require the later start time to be implemented by no later than July 1, 2021, or the date on which a school district's collective bargaining agreement that is operative on July 1, 2019 expires – whichever is later.

The available body of research that addresses the impact of sleep deprivation on youth between the ages of 12 and 18 is clear. By early adolescence, most children do not get enough sleep, and this trend worsens throughout the teenage years. The lack of sleep can lead to a number of negative outcomes in education, in areas including attendance rates, disciplinary action, state assessment scores, and college admissions test scores. We do not question the research, or the potential negative impacts that lack of sleep can have on adolescent children.

However, we respectfully dispute the position of the author and those supporting the bill that adjusting school start times is a "simple and obvious fix." Even the Centers for Disease Control and Prevention, which has published several papers on the topic of sleep deprivation in adolescents, has noted that school start times are just one factor that contributes to this problem: parental guidance and the need for health care professionals to educate families about the importance of adequate sleep are also critically important.

And while we would agree that the actions of public schools should be based first on the needs of students and families, we must also forcefully bring to your attention the number of very real issues that will result from a decision at the state level to affect this change. Put simply, school schedules affect a broad array of academic and operational programs,

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including, but not limited to academic intervention, child care programs, after school programs, athletic programs and other extracurricular activities, home-to-school transportation, and many others. The process of creating and maintaining a school district schedule is a complicated one that must balance many different factors. A change in that schedule of even minutes can result in unintended consequences for students, staff, parents, and the community, as well as an economic impact on the school district.

Some of the challenges presented by the bill are particularly troublesome. First, because state funding of home-to-school transportation has failed to recognize the full costs of transporting students for decades, many school districts have no choice but to stagger school pick-up times over a range of time, deploying buses on multiple runs to serve schools and students in the district. Mandating school start times would inevitably result in increased costs to these districts in order to accommodate the change in schedule. On the issue of transportation, the Senate Appropriations Committee fiscal analysis of SB 328 notes the following:

School districts that continue to provide home-to-school transportation services for students may need to modify their schedules to adhere to the prescribed start time. However, districts with limited staff or buses, particularly small and rural districts and/or districts with staggered schedules may have difficulties with this. For example, a district that currently has staggered start times of 7:30 a.m. for a high school, 8:00 a.m. for a middle school, and then elementary schools starting 8:30 a.m., the start times may need to be pushed back an hour with the high school starting at 9:30 a.m. But if the district were to have each of those schools start at 8:30 a.m., it would not be able to do so without additional staff or buses. ***To the extent that the Commission on State Mandates determines that these activities are claimable, there could be additional Proposition 98 General Fund costs which are likely to be significant. The cost for just 150 buses statewide would be approximately \$10 million. However, these activities would stem from the bill's prohibition and not a requirement, so they may not be interpreted to be a mandate. In that case, school districts would have to absorb the costs within existing resources.***

Further, we are concerned about the impact of the bill on families with two working parents, and their ability to balance work schedules while ensuring that their children are cared for in a safe environment. This could increase the demand for programs before the school day, or create pressure on districts to provide additional staff time for supervision, resulting in schools needing to open their doors by a specific time to accommodate students that would need to be dropped off.

While we appreciate Senator Portantino's recognition that, through an exemption for "rural" school districts, that the burden of the bill's requirements would simply be too much to bear, we are very concerned about lack of clarity surrounding how "rural" is defined. We would also suggest that other factors, including but not limited to the average daily attendance of the district, are equally important in making that determination. For example, should charter schools that provide instruction exclusively in partnership with the federal Workforce Innovation and Opportunity Act, or federally affiliated Youth Build programs, be subject to the bill's provisions? We believe these issues should have been resolved in this bill and not subject to debate during a future legislative session.

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In conclusion, we are supportive of the bill's overall goal to improve learning conditions for students, and sensitive to perceptions that decisions pertaining to school schedules are based more on the needs of adults than the needs of those students. However, the problems identified above are real issues that must be addressed, as the opportunity costs from many districts would significantly outweigh any benefit resulting from the bill.

Ultimately, *it is the governing boards in local communities and governance teams at local education agencies who are best suited to make those decisions, with the input of students, families, teachers, staff and community stakeholders.* Each school district and county office of education operates under a unique set of circumstances, and mandating a statewide solution on this issue is unlikely to result in informed and responsible decisions that best protect the health and safety of our students.

For the reasons outlined above, we respectfully request that you veto Senate Bill 328.

Sincerely yours,

A handwritten signature in black ink, reading "Jeffrey A. Vaca". The signature is written in a cursive, flowing style.

Jeffrey A. Vaca
Chief Governmental Relations Officer
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