



July 27, 2026

The Honorable Sabrina Cervantes, Chair
Senate Appropriations Committee
State Capitol, 412
Sacramento, California 95814

Re: Assembly Bill 2651 (Bonta) – **Oppose**

Hearing: Senate Appropriations Committee – August 3, 2026

Dear Senator Cervantes,

On behalf of the Association of California School Administrators (ACSA), the California Association of School Business Officials (CASBO), and the California School Boards Association (CSBA) we write to respectfully oppose AB 2651 (Bonta) because it creates new ongoing administrative costs and workload for local educational agencies (LEAs) without demonstrating a clear benefit to student health outcomes.

Our organizations strongly support California's longstanding school immunization requirements and recognize the important role vaccinations play in protecting students, staff, and school communities. However, AB 2651 imposes new operational responsibilities on schools, while not effectively addressing the underlying concern about low vaccination rates.

California has an established system for responding to communicable diseases and outbreaks. Under Title 17 of the California Code of Regulations, schools are required to report suspected communicable disease outbreaks to their local health department (LHD). The LHD leads the public health investigation and response, while schools implement directives and support communication and monitoring efforts. AB 2651 would add a separate, ongoing notification responsibility for schools, unnecessarily expanding LEA obligations and diverting resources from their core educational mission.

The bill requires LEAs to notify families whenever the California Department of Public Health (CDPH) determines a school's immunization rate falls below a prescribed threshold. The fiscal and operational impacts extend far beyond simply sending a letter home. Schools will be responsible for responding to parent inquiries, verifying student immunization records, explaining state-generated notifications, and addressing concerns from families whose students are already fully vaccinated. School nurses—many of whom serve multiple campuses—and already overextended front office staff will be required to redirect significant time from their core responsibilities to manage these new demands without additional funding. Moreover, the mandate could create a domino effect of costs and resource demands for school and county board meetings, administrators, and community engagement as parents respond to the notifications.

The bill also creates an inefficient system by relying on point-in-time immunization data that may not reflect current conditions when notifications are issued. Student vaccination records change throughout the school year as families submit updated documentation, and students receive

additional vaccinations or qualify for conditional admission. Yet AB 2651 provides no mechanism for CDPH to update its data or issue revised notifications once a school's immunization rate improves. Instead, schools will be left to distribute outdated information and reassure families that the state's notice no longer reflects current conditions.

These administrative responsibilities carry significant fiscal consequences. Parents who receive these notices may incorrectly conclude that a school is unsafe and choose to keep their children home or transfer to another school. Reduced attendance directly impacts Average Daily Attendance (ADA), the primary driver of state funding for school districts. Even temporary declines in attendance can reduce revenue while the bill simultaneously increases administrative costs as LEAs respond to community concerns and restore confidence in their schools.

AB 2651 also duplicates responsibilities more appropriately performed by public health agencies. If the Legislature believes additional notification is necessary, CDPH or LHDs—not schools—should remain responsible for maintaining current immunization data and communicating directly with the public. Requiring educators to serve as intermediaries for evolving public health information creates unnecessary workload, increases costs, and diverts scarce school resources away from supporting students.

At a time when California continues to prioritize directing limited education resources toward improving student outcomes, AB 2651 moves in the opposite direction. It creates an ongoing workload for LEAs, increases pressure on already limited administrative staff, and risks reducing attendance-based funding without demonstrating a corresponding public health benefit.

For these reasons, ACSA, CASBO, and CSBA respectfully urge your **NO** vote on AB 2651.

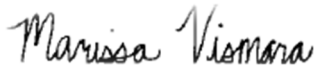
Sincerely,



Serette Kaminski
Legislative Advocate
Association of California School
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Sara E. Pietrowski
Chief Governmental Relations Officer
California Association of School Business
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Marissa Vismara
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cc: Members, Senate Appropriations Committee
Assemblymember Mia Bonta
Amanda Richie, Consultant, Senate Republican Caucus