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California Association for Bilingual Education

April 16, 2025

The Honorable Blanca Rubio  
California State Assembly  
1021 O Street, Room 5250  
Sacramento, CA 95814

**RE: AB 1121 (Rubio) Early Literacy – OPPOSE** *(as amended April 2, 2025)*

Dear Assemblymember Rubio,

On behalf of the coalition of educational organizations and advocates representing teachers, school leaders, and English learners who are committed to equity, literacy, and multilingual education across California, we respectfully oppose Assembly Bill (AB) 1121. While we deeply appreciate your commitment to advancing literacy outcomes, we believe that this bill, as currently written, falls short of serving California's diverse student population—particularly English learners and students in dual-language and biliteracy programs.

There is a consensus among the coalition around several core concerns, which we outline below:

### **1. Need for This Proposal**

The coalition continues to question the necessity of AB 1121, given the robust instructional frameworks and state policies already in place. Our concerns are particularly acute regarding what appears to be a disproportionate emphasis on phonics.

It is important to note that there is universal agreement within the coalition on the importance of systematic and explicit instruction in phonics and phonemic awareness. These components are already embedded within existing law and the ELA/ELD Framework. However, narrowing instruction to phonics at the expense of oral language and vocabulary development, comprehension, background knowledge, and a genuine love of reading undermines the goal of producing literate, critical thinkers.

This narrow focus is especially harmful for English learners, who require a broader instructional approach that supports the development of oral language skills, academic language and background knowledge. Students who speak non-standard dialects or come from diverse linguistic backgrounds may find isolated phonics instruction disconnected from authentic literacy experiences. A balanced and integrated approach is essential.

To date, the sponsors have not demonstrated how this bill would improve student achievement in reading. In fact, we believe there are indications that it may hinder progress, particularly for our most vulnerable and diverse student groups.

## **2. Instructional Improvement and Implementation**

While change is often pursued with the goal of improvement, the coalition questions whether the changes proposed by AB 1121 are necessary or beneficial. We support ongoing professional development for educators, but we are deeply concerned that this bill mandates training with an overly narrow instructional focus centered primarily on phonics. This approach does not reflect the comprehensive, research-based understanding of literacy that includes vocabulary development, comprehension, writing, oral language, and content knowledge.

The bill also lacks clarity in how it would improve or modify existing law. The coalition has asked for specific comparisons between current content adoption processes and those proposed under AB 1121. Thus far, the sponsors have not provided a compelling rationale or evidence of meaningful gaps in policy that would necessitate this legislative shift.

Additionally, there is concern that the bill's ambiguous relationship with current statutes could create confusion for curriculum developers. Without clear guidance on how statutory ideals relate to prescriptive content criteria, developers may struggle to align new materials, potentially undermining the coherence and quality of reading instruction.

## **3. Mandates and Fiscal Impact**

The coalition has persistently raised concerns about the mandates within AB 1121. In particular, the professional development requirement, absent clear evidence of its effectiveness, is problematic. We believe that mandating a single method of reading instruction through state mandate undermines educators' professional expertise and autonomy to respond to the specific learning needs of their students. One-size-fits-all training risks sidelining the very instructional flexibility that is crucial in California's diverse classrooms.

The proposed requirement for a formal waiver process for curriculum adoption is also concerning. Currently, local educational agencies (LEAs) already have the flexibility to adopt instructional materials that align with state standards. Adding a separate waiver process specifically for reading materials creates a bifurcated system—one for reading and another for all other subjects—introducing unnecessary complexity without clear benefit. Moreover, existing law, including Education Code Section 60002, already mandates substantial teacher involvement and encourages participation from parents and community members in the

selection of instructional materials. Final adoption by a school district's governing board ensures that the process is transparent and public, making the waiver requirement in this bill unnecessary.

Further, AB 1121 proposes using discretionary funds to implement its mandates. These funds should continue to be allocated to LEAs based on thoughtful planning and input from educators, parents, and community members. Redirecting these resources without local consultation undermines both the principle of local control and the investments that communities have already made in student learning.

#### **4. Transparency and Accountability Measures**

The coalition supports transparency in educational practices and decision-making; however, AB 1121's approach to accountability raises several concerns. The bill mandates that school districts publicly report, by individual school site, the percentage of educators who have completed the required professional development in foundational reading skills. While intended to promote accountability, this requirement could unfairly single out schools or educators, especially in under-resourced areas, without addressing the underlying challenges that may impact training access—such as lack of time, staffing shortages, or inadequate funding for substitutes and training resources.

Rather than supporting educators, this reporting mechanism may serve as a punitive measure that places pressure on teachers and administrators without offering the systemic support needed for meaningful improvement. It assumes that public reporting alone will lead to better outcomes, while ignoring the real-world barriers that educators face in implementing new professional learning. This approach risks demoralizing teachers and could inadvertently shift focus away from instructional quality toward compliance.

AB 1121 also requires districts to publicly post online the ELA/ELD instructional materials used at each school site. While transparency in curriculum selection is valuable, singling out ELA/ELD materials for this level of disclosure creates a double standard and may lead to confusion. It also places additional administrative burdens on districts without clear evidence that such reporting improves literacy outcomes or enhances public engagement in the curriculum adoption process—particularly when current policy already requires significant teacher involvement and encourages input from parents and community members in the selection of instructional materials. Existing guidelines also provide direction for districts choosing non-state-adopted materials and strongly recommend the use of state-approved programs to ensure quality and alignment with educational standards.

Together, these measures suggest a lack of trust in local decision-making and distract from more effective strategies for supporting literacy instruction. Rather than imposing new reporting mandates, the state should focus on empowering educators with high-quality training, sufficient planning time, and local flexibility to implement comprehensive literacy programs that meet the diverse needs of their students.

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The coalition agrees that improving literacy/biliteracy is essential. However, AB 1121 promotes a narrow, one-size-fits-all approach that is inconsistent with research, misaligned with California's current frameworks, and potentially harmful to English learners, multilingual students, and other students whose academic needs require oral language development, vocabulary, and comprehension skills—alongside, and equally as important as, phonics instruction. We urge you to reconsider this proposal and instead support efforts to invest in the full, statewide implementation of California's existing, comprehensive literacy/biliteracy vision.

Thank you for your time and leadership on this important issue.

Sincerely,

***California Teachers Association (CTA)***  
***Association of California School Administrators (ACSA)***  
***Californians Together (CalTog)***  
***California Association for Bilingual Education (CABE)***  
***California School Library Association (CSLA)***