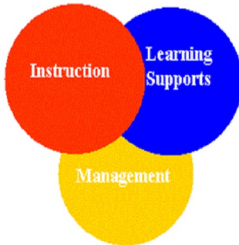

Practice and Policy Brief



**Are Initiatives to Improve School-Based Mental Health Services
Hindering Efforts to Transform Student/Learning Supports?**

(2026)

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*Initially, the Center was named the *Center for Mental Health in Schools*; in 2017, to more fully underscore the breadth of the work, the Center name was expanded.

The real difficulty in changing the course of any enterprise lies not in developing new ideas but in escaping old ones.

John Maynard Keynes

Howard S. Adelman, Ph.D. is professor of psychology and co-director of the national Center for MH in Schools & Student/Learning Supports at UCLA. He began his professional career as a remedial classroom teacher in 1960. From 1973-1986, he directed the Fernald School and Laboratory at UCLA. Since 1986, he, Linda Taylor, and the Center staff have continued to pursue ways to transform how schools address barriers to learning and teaching.

Linda Taylor, Ph.D. is co-director of the national Center for MH in Schools & Student/Learning Supports at UCLA. In her early career, Linda was involved in community agency work. From 1973 to 1986, she co-directed the Fernald Laboratory School and Clinic at UCLA. In addition to her co-director position at UCLA, she worked from 1986-2000 as a clinical psychologist in the Los Angeles Unified School District where she directed several large-scale projects.

Adelman and Taylor have worked together for over 40 years with a constant focus on improving how schools and communities address barriers to learning and teaching, reengage disconnected students and families, and promote healthy development. Over the years, they have led major projects focused on dropout prevention, enhancing the mental health facets of school-based health centers, and developing comprehensive, school-based approaches for students with learning, behavior, and emotional problems. Their work has involved them in schools and communities across the country. Their current focus is on policies, practices, and large-scale systemic transformation. This work includes facilitating the National Initiative for Transforming Student and Learning Supports.

Executive Summary

California has launched three major statewide initiatives to expand and improve supports for students' emotional, behavioral, and social development and well-being: **the Children and Youth Behavioral Health Initiative (CYBHI)**, **the California Multi Tiered System of Supports (CA MTSS)**, and **the California Community Schools Partnership Program (CCSPP)**. Together, these initiatives represent one of the largest public investments in school related mental health and whole child supports in the nation.

This brief distills key concerns raised by our Center's analysis of whether these initiatives are helping to transform student and learning supports – or whether they are unintentionally exacerbating long-standing system deficiencies. The focus is not on judging individual programs, but on identifying basic policy and system design questions that must be addressed if investments are to produce lasting, equitable improvements in providing essential student supports.

Core Concerns Guiding the Analysis

1. System Coherence vs. Continued Fragmentation*

Although the three initiatives are widely described as complementary, a central concern is whether schools and districts are being supported to operate a single, coherent system of student and learning supports, or whether they are managing multiple parallel initiatives with separate governance structures, compliance demands, funding streams, and accountability requirements.

Key question: Is alignment being designed and institutionalized – or merely assumed?

*Throughout this report, we use “fragmentation” to denote the proliferation of parallel initiatives and governance structures addressing overlapping student needs without shared authority, data, or accountability. Fragmentation is not treated as a standalone problem, but as a symptom of the long-standing marginalization of student and learning supports within school improvement policy.

Then you're done defining it.

2. Transformation vs. Initiative Layering

The analysis raises concerns that new initiatives are being layered onto an already fragmented and marginalized support subsystem. While activity and service availability have expanded, the underlying way schools address barriers to learning and teaching may remain largely unchanged.

Key question: Are current efforts changing core system conditions – or primarily expanding programs within existing structures?

3. Governance and Infrastructure Readiness

Transformative change requires reworking governance, leadership authority, staffing roles, data systems, and operational infrastructure. The report questions whether districts and schools are being given the time, authority, and guidance needed to make such changes – or whether implementation expectations presume capacity that does not yet exist.

Key question: Are governance and infrastructure being redesigned to support integration – or left largely unchanged?

4. Financing as a Driver of System Design

Growing reliance on Medicaid and insurance billing raises concerns that financing mechanisms may drive service delivery in narrow directions. Billing requirements tend to favor diagnosable, reimbursable treatment services, potentially at the expense of prevention, early intervention, and schoolwide supports – and may advantage districts with greater administrative capacity.

Key question: Does financing support comprehensive, prevention-oriented systems – or reinforce inequities and service silos?

5. Local Problem Solving and Capacity Building

Another concern is whether initiative guidance and compliance pressures support or constrain local decision making. Schools may be required to implement predefined practices even when these do not address their most pressing barriers to learning.

Key question: Are initiatives strengthening local capacity for continuous improvement – or limiting adaptive problem solving?

6. Equity: Stated Priority vs. Operational Reality

Equity is central to all three initiatives, yet the analysis questions whether equity is consistently embedded in governance structures, decision rules, accountability systems, and financing strategies. There is concern that services may concentrate where implementation and billing are easiest, rather than where need is greatest – and may continue to reach only a small proportion of students who require support.

Key question: Is equity being operationalized through system design – or diluted in practice?

Bottom Line for Leaders

The analysis suggests that a challenge for every state, district, and school is not just one of commitment or investment, but of ensuring system coherence through intentional design. Students and learning supports must be redesigned as a unified component of school improvement. Without that redesign, initiatives may mainly expand services while leaving fragmentation and marginalization.

Policy Implication: Lasting improvement will require moving beyond initiative alignment toward deliberate redesign of governance, strategic use of available resources, infrastructure, data use, and accountability – so that addressing barriers to learning and teaching becomes a core, integrated function of schooling rather than a collection of parallel efforts.

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PREFACE

Calls to improve schooling are constant and intensifying. They arise alongside persistent efforts to translate research into practice and policy, often through the promotion of major initiatives and large scale interventions. While much of this advocacy emphasizes program adoption and expansion, others stress the need for fundamental systemic change.

In this context, decades ago Seymour Sarason (1996) offered a caution that remains highly relevant:

Good ideas and missionary zeal are sometimes enough to change the thinking of individuals; they are rarely, if ever, effective in changing complicated organizations (like the school) with traditions, dynamics, and goals of their own.

Over the years, we have learned – sometimes painfully – how prescient this warning was.

Our early work, beginning in the 1980s and 1990s, sought to capture essential facets of interventions in psychology and education. In subsequent decades, our research and development efforts increasingly focused on school improvement and implementation. Through this work, we have come to appreciate just how inseparable intervention design and implementation processes truly are – and how often system change efforts falter when this interdependence is ignored by policy makers.

This report is grounded in that perspective. Its purpose is threefold:

- (a) to describe three major statewide initiatives currently shaping student and youth supports in California;
- (b) to examine their implementation and related design problems; and
- (c) to clarify how current approaches may unintentionally undermine efforts to fundamentally transform student/learning supports.

Improving schools is an unending task. This report is written for those already engaged with – and concerned about – the challenges of transforming schools, as well as for those we hope will become similarly engaged. Implicit throughout is an agenda for theory development, transformative research, and fundamental systems redesign.

In examining the design, implementation, and system level impacts of three California’s statewide initiatives to improve student and youth supports, we draw on multiple sources including:

- >State statutes, program guidance, and administrative materials related to the California Community Schools Partnership Program (CCSPP), California’s Multi Tiered System of Supports (CA MTSS), and the Children and Youth Behavioral Health Initiative (CYBHI)
- >Published research and policy analyses focused on system transformation, MTSS, community schools, and school-based mental health
- >Implementation reports, evaluation findings, and technical assistance materials produced by state agencies, county offices of education, and intermediary organizations
- >Syntheses of practitioner experience and field based observations reported in the literature and public documents

The analyses emphasize structural patterns and implementation dynamics across the initiatives, not evaluations of individual programs or sites.

While the analyses, interpretations, and conclusions (and any errors) are the responsibility of the authors, it will be evident that our work owes much to many. We are especially grateful to practitioners in the field whose insights and wisdom continue to inform our thinking. We are also indebted to the many scholars whose research constitutes a shared intellectual foundation;

to the graduate and undergraduate students at UCLA who contribute daily to this work; and, most importantly, to the young people and families who consistently teach us what matters most. Microsoft Copilot (an AI enabled editing tool) was used to assist with final editorial refinement.

As always, what we present reflects work in progress. We welcome your feedback and dialogue.

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Respectfully submitted for reflection,
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Are Initiatives to Improve School-Based Mental Health Services Hindering Efforts to Transform Student/Learning Supports?

Driven by unprecedented state investments, California is undertaking one of the nation’s most ambitious expansions of school-based mental health services. The state has launched three large scale initiatives – the Children and Youth Behavioral Health Initiative (CYBHI), the California Multi Tiered System of Supports (CA MTSS), and the Community Schools Partnership Program (CCSPP). Collectively, these efforts reflect concern about rising emotional, behavioral, and learning problems among students and a continuing recognition that schools are critical settings for prevention, early identification, and access to care.

At the same time, the rapid expansion of mental health-focused initiatives is occurring within education systems that have long addressed barriers to learning and teaching with fragmented, piecemeal approaches. As currently designed and implemented, the three initiatives risk maintaining categorical programs rather than advancing a unified, comprehensive system of student and learning supports.

This report (a) describes the three major statewide initiatives, (b) discusses their implementation and related design problems, and (c) clarifies how current approaches may unintentionally undermine efforts to fundamentally transform student/learning supports.

Rapid Growth – and Uncertain Sustainability

Between 2018–19 and 2023–24, California school districts increased spending on student health and mental health by 75%, from approximately \$934 million to \$1.64 billion – largely driven by temporary federal and state relief funding. As these one time funds expire, the state’s new initiatives are intended to stabilize and expand school-based supports, but they raise critical questions about long term coherence, capacity, and systemic impact (Mustala et al., 2026).

Three Initiatives – Complementary Strategies

The initiatives reviewed in this report reflect different, and on the surface complementary, strategies for improving student supports in California schools. In brief, they are

- **The Children and Youth Behavioral Health Initiative (CYBHI).** This is a multibillion dollar, five year effort launched in 2021 with an investment of approximately \$4.6-\$4.7 billion. Its goal is to build a more integrated, youth centered behavioral health system statewide by expanding access points, strengthening the behavioral health workforce, and enabling schools and school linked providers to bill for reimbursable services through a statewide multi-payer fee schedule (California Department of Health Care Services [DHCS], 2023, 2024). Schools are a central access point within CYBHI’s design; this reflects evidence that they serve as primary settings for early identification and service delivery for many youth (Mustala et al., 2026).

California's education system includes more than 1,000 local educational agencies (LEAs) and nearly 10,000 public K-12 schools. All 58 County Offices of Education received CYBHI funds and are responsible for distribution to LEAs and charter schools.

Although comprehensive statewide counts are not publicly reported, available administrative reports indicate that hundreds of LEAs and several thousand school sites have been reached by CYBHI through grants, training, infrastructure development, or school linked behavioral health services. However, participation is voluntary and contingent on meeting operational and billing readiness requirements associated with the fee schedule model (DHCS, 2023, 2024).

As of early 2024, only 47 local educational agencies statewide had been approved to participate in the initial CYBHI all payer Fee Schedule cohort – out of more than 1,000 LEAs in California – indicating that most districts, particularly smaller and rural systems, remain in preparatory phases rather than full implementation (Mustala et al., 2026).

- **The California Multi Tiered System of Supports (CA MTSS).** This is a statewide organizing framework led by the California Department of Education (CDE). CA MTSS is intended to align academic, behavioral, social emotional, and mental health supports into a coherent, data driven system serving all students (CDE, 2022). The framework emerged through the Scale Up MTSS Statewide (SUMS) Initiative, launched with legislative investments beginning in 2015 and expanded through subsequent appropriations (California Education Code; Assembly Bill 104, 2015; Senate Bill 828, 2016).

Since 2016, California has invested more than \$200 million through county offices, demonstration cohorts, and statewide technical assistance to build MTSS infrastructure, capacity, and coherence across LEAs (CDE, 2022; Orange County Department of Education [OCDE], 2016).

CA MTSS is state endorsed but not mandated. There is no single, authoritative statewide count of how many schools have adopted MTSS. Research and implementation reports suggest moderate to widespread adoption or adaptation, but also indicate substantial variability in definitions, uneven fidelity, and large differences in depth and quality of implementation across districts and counties (Chong et al., 2022; Choi et al., 2022).

- **The California Community Schools Partnership Program (CCSPP).** This is a grant funded school improvement strategy designed to support schools in developing into community hubs. Established by the legislature in July 2021 and expanded in 2022, the CCSPP statute defines community schools as an equity driven, whole child school improvement strategy rather than a categorical service program (CDE, 2025a). Grant awards prioritize schools serving high concentrations of “unduplicated pupils,” defined as students from low income households, English Learners, and foster youth.

Between 2021 and 2025, the state invested more than \$4.1 billion in CCSPP through four major funding waves, culminating in final implementation grants approved in May 2025. By 2026, nearly 2,500 schools in more than 500 LEAs are funded under the program, making CCSPP the largest community schools investment in the nation (CDE, 2025b; Saucedo, 2024).

Funded schools are explicitly expected to align health, mental health, and MTSS type supports within the Community Schools Framework, integrating these resources into a broader school improvement strategy rather than operating them as stand alone services (CDE, 2025a).

Despite shared goals and substantial investments, the three initiatives are unfolding within a system long characterized by fragmentation and categorical approaches to student support. Early evidence suggests that, absent intentional alignment and a unifying framework, these well funded initiatives may compound rather than resolve underlying system problems.

The following is an analysis of how initiative design choices and implementation conditions are shaping system coherence, capacity, and equity – and clarifies ways current approaches may be undermining efforts to fundamentally transform student and learning supports.

How the Three Initiatives Relate to One Another

State-level leaders have consistently described the California Community Schools Partnership Program (CCSPP), California’s Multi Tiered System of Supports (CA MTSS), and the Children and Youth Behavioral Health Initiative (CYBHI) as complementary efforts to improve how schools and communities address child and youth mental health concerns (CDE, 2022; California Health and Human Services Agency [CHHS], 2024).

Conceptually, the initiatives divide labor across complementary system functions. CCSPP defines where and with whom integrated supports are organized; CA MTSS defines how supports are delivered, targeted, and monitored; and CYBHI strengthens what behavioral health services are available and how those services are financed (CDE, 2022; CHHS, 2024). Given this:

- **CCSPP** calls for schools to serve as organizing hubs for whole child, whole school infrastructure. The initiative emphasizes collaborative leadership structures – such as site based leadership teams, shared decision making processes, and interagency partnerships – to guide whole child implementation (CDE, 2025). Community schools are expected to align academics, health and mental health services, family and community engagement, and collaborative leadership within a shared improvement strategy (CDE, 2022; Learning Policy Institute, 2021).
- **CA MTSS** teams operating within a community school are expected to conduct student level problem solving and apply tiered interventions. The tiered intervention framework is intended to support prevention efforts and early identification of student needs. Needs are to be matched to graduated levels of support, with progress monitored across academic, behavioral, social emotional, and mental health domains (CDE, 2023; Orange County Department of Education, 2023).

- **CYBHI** focuses on increasing behavioral health capacity and sustainability by expanding access to prevention, early intervention, and diagnostic and services, while also establishing new financing pathways for school linked behavioral health supports (CHHS, 2024; Department of Health Care Services, 2024). CYBHI funded partners are intended to integrate behavioral health services into existing school governance and decision making structures (CDE, 2025; CHHS, 2024).

Despite the conceptual alignment, it remains unclear how many schools are simultaneously and deliberately pursuing all three initiatives in a coordinated manner. Synthesizing available CCSPP implementation data, CYBHI participation patterns, and CA MTSS adoption findings suggests that approximately 1,000 to 1,500 schools statewide are engaged in all three initiatives to some degree. Far fewer appear to be achieving deep, coherent integration across governance, data use, service delivery, and financing (Learning Policy Institute, 2025; UCLA Center for the Transformation of Schools, 2025). Given that California has 9,947 public TK-12 schools statewide, available participation data suggest that only an estimated 10–15 percent of California schools are engaged in CCSPP, CA MTSS, and CYBHI concurrently (CDE, 2025).

The limited overlap certainly is relevant to understanding why system coherence, scale, and sustainability remain persistent policy challenges – even as the state continues to make historically significant investments in whole child and youth mental health initiatives (Learning Policy Institute, 2021; CHHS, 2024).

Concerns related to the three initiatives are synthesized in the following Exhibit. Taken together, these considerations point to a deeper, underlying policy problem – one that cannot be resolved through initiative alignment alone.

Exhibit 1. **Important Considerations and Controversies Related to the Initiatives**

Below are some major factors that complicate efforts to integrate the California Community Schools Partnership Program (CCSPP), California Multi-Tiered System of Supports (CA MTSS), and the Children and Youth Behavioral Health Initiative (CYBHI).

1. Reliance on Medicaid and Insurance Billing

- Increased dependence on Medicaid and insurance billing to finance school-based mental health services raises sustainability and alignment concerns.
- Billing mechanisms prioritize reimbursable diagnostic and treatment services, often at the expense of prevention and early intervention.
- Complex billing systems advantage larger districts and organizations with administrative capacity.
- Overlapping CYBHI and special education Medi Cal billing pathways blur Tier 3 boundaries, reinforcing finance driven service decisions and continued reliance on special education as the de facto provider of intensive supports.

System Effects: Strong initial implementation followed by weak continuation; service models driven by billing feasibility rather than student and school needs.

2. Uneven Billing Capacity and Absence of a Braided Finance Strategy

- CYBHI billing is technically complex and unevenly supported across counties.
- Smaller districts and community-based organizations often rely on time-limited grants rather than sustainable models.
- No single entity is responsible for aligning education finance, health billing, and MTSS priorities.

System Effects: Fragmentation, inequitable access, and limited scalability.

3. Administrative and Compliance Burdens

- Extensive documentation, duplicative consent requirements, and compliance monitoring increase workload.
- Staff time is diverted from service delivery or instruction to administrative tasks or outsourced contracting.

System Effects: Reduced capacity, inefficiency, and increased burnout.

4. Data Sharing and Accountability Limitations

- Education data and health data are difficult to share legally and technically.
- Schools often cannot determine how CYBHI services interact with MTSS tiers or affect outcomes.
- School accountability data primarily focuses on academic achievement and gathers relatively few indicators related to the direct impact of student supports

System Effects: Decision-making related to school improvement policy and practice is not well-informed when it relies in the limited data gathered.

5. Equity and Scope-of-Service Concerns

- Prevention and early intervention are underfunded due to Medicaid reimbursement rules.
- Services may concentrate where billing is easiest rather than where need is greatest.
- Family engagement can become symbolic rather than decision-shaping.

System Effects: Capacity is enhanced, but disparities persist during implementation.

An overall implication of these concerns is that initiatives, such as those California has so extensively invested in, risk exacerbating fragmentation of student and learning supports and can hinder essential system transformation.

Implementation Challenges in Integrating CCSPP, MTSS, and CYBHI

As emphasized in our 2024 report, making multifaceted, complex, and sustainable improvements – at both the school site and systemwide levels – requires explicit attention to four interrelated sets of intervention considerations:

- Developing a multifaceted intervention prototype for system improvement
- Reworking operational and organizational infrastructure to support initial implementation, day to day operation, and continuous improvement of the prototype
- Pursuing systemwide replication that is sustainable and renewable
- Ensuring enabling policy support and ongoing policy revision

While implementation efforts may focus primarily on one of these considerations, we stress that the four are functionally interdependent. Problems that surface during implementation rarely stem from failure in only one area; instead, persistent difficulties reflect misalignment across all four. Viewed through this lens, the challenges observed in efforts to integrate CCSPP, CA MTSS, and CYBHI are best understood as symptoms of incomplete development across the full set of considerations rather than isolated implementation failures.

Challenge 1. *Developing a Multifaceted Intervention Prototype*

At the prototype level, California’s policy architecture implicitly assumes that CCSPP, CA MTSS, and CYBHI together constitute a coherent whole child intervention model. As noted, CCSPP supplies a community school vision and collaborative leadership emphasis; MTSS provides tiered problem solving logic; and CYBHI contributes behavioral health capacity and financing mechanisms. In practice, however, the initiatives are co-located rather than fully integrated into a single, articulated prototype.

The absence of a clearly specified integrated prototype is most evident in governance and service delivery design. Schools are expected to operate CCSPP leadership structures, MTSS problem solving teams, and CYBHI coordination and compliance processes simultaneously – without shared decision rules or a unifying theory of action specifying how these bodies function together. As a result, parallel teams often address overlapping student populations using different data sources, time lines, and criteria for action. This fragmentation reflects not resistance at the local level, but prototype ambiguity: there is no concrete, operational model that school and district leaders can confidently enact.

Similarly, although California’s MTSS framework explicitly includes mental and behavioral health, the prototype for what student supports look like in everyday school practice remains underdeveloped. Intervention definitions are far clearer for academics than for student wellness, prevention, and early behavioral supports. Consequently, CYBHI supported services tend to default toward clinical or crisis driven responses rather than functioning as embedded Tier 1 and Tier 2 supports within an MTSS framework.

In short, the state has articulated vision elements, but it has not fully developed a multifaceted intervention prototype that clarifies how governance, tiering, service delivery, data use, partner roles, and existing student/learning supports operate as one integrated system.

Challenge 2.
*Reworking
Operational and
Organizational
Infrastructure*

Implementing a multifaceted prototype requires significant changes in roles, functions, and working arrangements. Reworking existing infrastructure in this way demands time, authority, and sustained technical assistance.

Governance infrastructure illustrates this challenge clearly. CCSPP promotes collaborative leadership but offers limited guidance on how authority should be redistributed, consolidated, or exercised across teams. MTSS teams focus on instructional and behavioral decision making, while CYBHI partners must comply with health sector accountability and documentation requirements that introduce parallel oversight structures.

Moreover, existing infrastructures – within districts, schools, and community agencies – were not designed for cross system operation. School and agency administrators often are tasked to help implement the new initiatives as added functions to their regular jobs. District student support personnel (e.g., counselors, psychologists, social workers, nurses) have established roles and responsibilities, often codified in contracts; community-based providers operate under different professional and regulatory frameworks. Boundaries between roles are frequently unclear, particularly regarding responsibility for referral coordination versus diagnosis and treatment delivery. Where these boundaries are ambiguous, staff may be assigned intervention responsibilities for which they are not adequately trained (State Transformational Assistance Center [STAC], 2024).

CYBHI has expanded behavioral health services more rapidly than workforce pipelines can supply qualified personnel, while CCSPP coordinators are often hired before system level integration training and guidance are available (CalHHS, 2024). They are frequently positioned as integration hubs but are assigned responsibilities – clinical coordination, referrals, compliance tracking – that exceed both their training and role design. At the same time, CYBHI has increased service availability faster than role clarity and infrastructure can support.

The result of all this is governance and workforce overload, too many unproductive meetings, unclear decision authority, heavy reliance on informal relationships instead of durable operating procedures, and implementation disruptions. And such working conditions contribute to role drift, inefficiency, and burnout.

Data infrastructure weaknesses further undermine implementation. MTSS and CCSPP rely on timely access to attendance, achievement, climate, and service use data, while CYBHI depends on clinical documentation and billing systems governed by HIPAA. In the absence of interoperable platforms or standardized data sharing protocols, schools and partners often cannot answer basic operational questions about who is receiving which services and with what effects. With respect to school improvement policy and practice, limited data can lead to misguided decisions.

From this perspective, implementation problems reflect incomplete organizational reengineering rather than isolated execution failures.

Challenge 3.
*Systemwide
Replication and
Sustainability*

All three initiatives emphasize scale: CCSPP seeks statewide transformation, MTSS is intended as a systemwide organizing framework, and CYBHI aims to normalize school linked behavioral health services across California. Yet replication is occurring primarily through local improvisation rather than through deliberately designed system change.

In the absence of a standardized prototype or shared infrastructure, counties and districts develop idiosyncratic solutions to governance, data sharing, staffing, and billing. While these local adaptations may succeed temporarily, they are difficult to replicate or sustain across diverse settings. Smaller districts and community based organizations, in particular, struggle to access CYBHI reimbursement mechanisms and often rely on short term grants or pilots rather than durable service models.

Without explicit strategies for replication, sustainability, and renewal – such as a clearly articulated prototype, aligned policy and administrative guidance, coaching supports, and formative monitoring procedures – scaling efforts are prone to drift. Schools can “start strong” under grant funding yet remain poorly positioned to sustain gains as funding cycles shift.

In systemic terms, replication is proceeding despite unresolved deficiencies in design, infrastructure, scale up processes, and policy alignment.

Challenge 4.
*Policy Support
& Policy Revision*

At the policy level, CCSPP, MTSS, and CYBHI are rhetorically aligned around equity, prevention, and whole child development. However, policy guidance largely assumes integration rather than requiring it.

None of the initiatives mandates a unified governance structure, integrated data strategy, or shared accountability framework. Equity goals are articulated but not consistently translated into enforceable MTSS decision rules or CYBHI contracting requirements that ensure services reach students with the greatest needs rather than those easiest to serve. Privacy guidance clarifies legal parameters under FERPA and HIPAA but leaves schools and partners individually responsible for designing operationally workable, compliant systems.

From this perspective, current policy functions more as enabling rhetoric than as a driver of systemic redesign. Without policy requirements that compel complex system change – paired with investment in making it happen effectively – local systems are left to negotiate essential transformations on their own.

In sum, CCSPP establishes vision, MTSS articulates process logic, and CYBHI supplies resources – but no mechanism ensures these elements lock together into a coherent operating system. The failure of complex system reform is often not due to flawed components, but to the absence of structures that intentionally connect prototype design, infrastructure reworking, scalable replication, and policy authority. Addressing implementation challenges in California’s current context therefore requires moving beyond alignment narratives toward (a) a detailed integrated prototype, (b) mechanisms for daily implementation, (c) strategies for sustainable scale up, and (d) policy authority and supports aligned to each of these tasks.

Counterproductive Impacts on Efforts to Fundamentally Transform Student/Learning Supports

Although the intentions of the three major statewide initiatives are well meaning, their design and implementation have tended to increase a long-standing pattern of fragmented, marginal, and episodic support for students in need. As a result, these initiatives can have a counterproductive effect on critically needed efforts to fundamentally transform student and learning supports so they more effectively address the wide range of emotional, behavioral, and learning problems schools confront each day.

Increasing Fragmentation Instead of Building Systemic Coherence

A persistent barrier to transforming student/learning supports has been the proliferation of disconnected programs, projects, and services (Adelman & Taylor, 2006, 2015, 2020, 2026). The statewide initiatives seek improvement – each introducing new requirements, categorical priorities, or compliance driven structures that layer onto existing efforts.

At the school level, for example, this commonly results in multiple parallel teams operating simultaneously – such as CCSPP steering or leadership committees, MTSS problem solving teams, and CYBHI or behavioral health coordination groups. These teams frequently meet separately, rely on different data sources, and make decisions about overlapping student populations without shared protocols or formal integration mechanisms (CDE, 2024; STAC, 2024).

A core contributor to this fragmentation is that none of the three initiatives mandates a single, integrated governance structure. CCSPP guidance encourages alignment but stops short of specifying how leadership and operational teams should merge, share authority, or function as one system (CDE, 2025). Simultaneously, CYBHI funded behavioral health partners must comply with health sector requirements – including MediCal billing rules and HIPAA aligned documentation – that often are not embedded within school leadership or improvement structures (CalHHS, 2025). As a result, coordination depends heavily on informal relationships rather than durable, system level design.

By emphasizing interventions, separate structures, and narrow outcomes, current initiatives divert attention from transforming how supports are organized, governed, and continuously improved. This ignores decades of research indicating that effective systems of student/learning supports should be unified, take place in classrooms and schoolwide, and be fully aligned with the educational mission of schools (Adelman & Taylor, 2014; Bryk et al., 2010).

Sustaining the Marginal Status of Student/Learning Supports

A second counterproductive outcome is the continued marginalization of student/learning supports relative to academic accountability and school improvement agendas. Despite strong rhetoric about “whole child” development, are California’s investments merely expanding access to services for a few more students? It is evident that implementation guidance and accountability data continue to prioritize academic indicators; this continues to address supports as ancillary, remedial, or supplemental (Adelman & Taylor, 2009). Consequently, leadership attention, resources, and professional development are disproportionately directed toward meeting initiative specific metrics rather than building local capacity to redesign support systems.

The marginalization undermines a central premise of student support transformation: that addressing barriers to learning and teaching is fundamental to improving academic outcomes, not secondary to them. Research on systemic change consistently shows that sustainable improvement requires shifts in organizational priorities, decision making authority, and resource allocation – not simply the introduction of new initiatives (Fixsen et al., 2005; Fullan, 2016). The three initiatives largely leave the marginalization of student and learning supports intact.

**Constraining Local
Problem Solving
and Capacity
Development**

The initiatives often lead schools and districts to pursue predefined strategies or evidence based practices, even when these approaches do not address the most pressing barriers to learning and teaching in a given context. This happens because of factors such as initiative mandates, established practices, newly defined processes, and an absence of rubrics.

For example, mandate compliance can divert attention from aligning resources to locally identified student/learning support priorities (Adelman & Taylor, 2018). MTSS professional development in California has historically emphasized academic response to intervention models, with comparatively little attention to operationalizing tiered mental health supports (OCDE, 2023). CYBHI services are frequently positioned outside MTSS decision cycles and are triggered by crisis, diagnosis, or referral requirements rather than by tiered need identified through school data (OCDE, 2023; California Association of Health and Education Linked Professions, 2020). Schools often lack shared rubrics defining what Tier 2 mental health interventions entail in practice, while health sector reimbursement systems prioritize billable therapy over participation in prevention-oriented MTSS workflows (CalHHS, 2024).

Approaching student supports without addressing such matters weakens local ownership, constrains problem solving, and undermines efforts for systemic improvements. Implementation research consistently finds that externally driven mandates that do not invest in reworking local infrastructure and enhancing collaborative learning rarely achieve deep or lasting impact (Adelman & Taylor, 2024; Fixsen et al., 2005; Honig, 2006).

**Undermining
Equity Focused
Transformation**

Finally, the cumulative impact of the three initiatives undermines equity focused transformation. By emphasizing targeted interventions for selected groups rather than strengthening universal and preventive systems, current approaches fail to address the structural conditions that produce opportunity gaps across schools and districts (Adelman & Taylor, 2018).

A fundamentally transformed system of student/learning supports prioritizes prevention, early intervention, and schoolwide practices that benefit all students, while ensuring more intensive supports are available when needed. Although CCSPP, CA MTSS, and CYBHI each seem to share this vision, their respective implementation activity falls short of catalyzing a broader shift in how schools understand and address the emotional, behavioral, and learning factors associated with student functioning.

Summary About the Three Initiatives

Taken together, California's three major statewide initiatives illustrate a familiar reform paradox: ambitious goals paired with designs and implementation patterns that inadvertently reinforce the very conditions they aim to change. While CCSPP, CA MTSS, and CYBHI seek to strengthen student well being and improve outcomes, their combined effects have largely been additive rather than transformative. As of 2024-25, only an estimated 10-15 percent of California schools are engaged in CCSPP, CA MTSS, and CYBHI concurrently, with even fewer operating under unified governance or data systems, given the absence of requirements for such integration. By layering new initiatives onto an already fragmented landscape, continuing to marginalize student/learning supports from core school improvement efforts, constraining local capacity building, and allowing equity commitments to erode during implementation, these initiatives have fallen short of advancing a unified, comprehensive, and equitable system of student/learning supports.

Rather than catalyzing systemic redesign, current approaches tend to reproduce long-standing patterns of categorical programming, parallel governance structures, compliance driven practices, and short term projects that operate at the margins of instructional improvement. The result is expanded activity and investment without corresponding gains in coherence, sustainability, or effectiveness at scale. Schools are asked to do more, but not differently and so do not fundamentally alter how barriers to learning and teaching are addressed.

At the same time, it is important to distinguish these systemic design and implementation findings from judgments about clinical effectiveness or long term student outcomes. Final statewide data on service utilization, quality, and population level impacts are not yet available. These outcomes depend on ongoing multi year evaluations – particularly of CYBHI – that are intended to assess changes in youth mental health status, service access and quality, system performance, and equity across demographic groups and regions.

However, the absence of outcome data does not preclude conclusions about system transformation. The evidence reviewed in this report suggests that, absent deliberate corrective action, expanded access to services alone will not produce the fundamental changes required to better address the many factors interfering with learning and teaching. Meaningful transformation will require a decisive shift away from initiative driven reform toward intentional development of a unified, comprehensive, and equitable system of student/learning supports. And such a system must align governance, financing, data, accountability, and classroom and schoolwide interventions with the core mission of schooling and be braided with relevant community resources.

Such a shift in thinking and action is not a rejection of CCSPP, CA MTSS, or CYBHI. Rather, it calls for redesigning how these initiatives function so that vision, process logic, and resources are compelled to operate with existing student/learning supports to develop a unified system. Without this shift, California risks continuing to invest heavily in improvements that expand services but stop short of transforming the conditions that produce persistent disparities and unmet student needs.

Implications for State Policy and System Redesign

California’s three initiatives underscore that meaningful improvement in outcomes for many students will not be achieved through continued expansion of parallel initiatives, no matter how well funded or well intended. What is required is a shift system redesign that explicitly organizes policy, infrastructure, implementation, and scale-up around a unified, comprehensive, and equitable system of student/learning supports fully aligned with the core mission of schooling.

Moving Beyond Alignment Narratives to Comprehensive System Changes

California policy discussions frequently emphasize “alignment” among CCSPP, CA MTSS, and CYBHI. However, alignment without redesign has proven insufficient. The persistence of parallel governance structures, incompatible data systems, and unbraided financing reveals that the state has largely relied on rhetorical alignment rather than designed integration. Future policy efforts must, therefore, focus on specifying—not assuming—how initiatives function together as one system.

This requires the state to articulate a clear, operationalized prototype for a unified, comprehensive, and equitable student/learning supports system. Such a prototype would clarify organization of governance, intervention processes, data gathering and use, and community partnerships at school, district, and county levels. Without such specificity, implementation will remain dependent on improvisation, informal relationships, and short term workarounds that cannot be sustained or scaled equitably.

Redesigning Governance for Coherence and Accountability

A central implication is the need to redesign governance structures to support coherence rather than coexistence. Current policy allows – and in practice encourages – schools to add and maintain multiple teams with overlapping and parallel responsibilities and unclear authority. State policy must move beyond encouragement toward requiring reworking of infrastructure for integrated governance arrangements that explicitly connect not just CCSPP, CA MTSS, and CYBHI, but all school efforts to address barriers to learning and teaching.

This does not mean imposing a one size fits all structure, but it does mean establishing minimum expectations for unified leadership, shared decision rules, and collective accountability for outcomes related to barriers to learning and teaching. Without such requirements, leadership attention will remain fragmented and student/learning supports will continue to be marginalized.

Reframing Financing as a Tool for System Transformation

The state’s increasing reliance on Medicaid and insurance billing represents a major structural lever – but also a significant risk. As currently configured, financing mechanisms stimulate service expansion without ensuring alignment with prevention-oriented, schoolwide support systems. The absence of a braided financing strategy leaves districts and community partners to navigate complex reimbursement systems independently, exacerbating inequities and undermining sustainability.

State policy should therefore reposition financing as a tool for system transformation rather than merely service reimbursement. This requires explicit strategies to braid education, health, and discretionary funds in ways that support prevention, early intervention, and integrated tiered

supports – not just billable diagnosis and treatment services. It also calls for centralizing responsibility for finance integration rather than placing that burden on individual districts and schools.

**Building
Infrastructure
for Continuous
Improvement,
Not Compliance**

Another key implication concerns data and accountability demands. Current systems prioritize compliance reporting and academic achievement data. And there is persistent inability to link educational with health data. These matters severely limit capacity for making informed decisions about effectiveness, equity, resource allocation, and system improvement.

State policy must invest in interoperable data infrastructure and shared analytic frameworks that provide schools and community partners with findings that enable continuous improvement decisions. With a view to ending the marginalization of student supports, policy makers must also broaden the accountability framework so that direct data related to addressing barriers to learning are included. Equally important, policy must provide operational guidance – not just legal clarification – on navigating FERPA and HIPAA boundaries in ways that support responsible data use rather than inhibiting it.

**Re-centering
Prevention and
Equity Through
System Design**

Although equity is a stated priority across all three initiatives, this report underscores that these initiatives are unlikely to close the opportunity gap. As with other narrowly focused initiatives, implementation of the designated supports will drift toward serving students who are easiest to reach, schools that are most administratively prepared, and services that are easiest to bill.

An equity oriented system redesign would prioritize prevention and early intervention while ensuring timely access to more intensive supports as needed. It also is important to fully engage family and community stakeholders in decision making within governance structures – rather than as symbolic add ons.

**From Initiative
Expansion to
Transformation**

Taken together, the implications are clear: California’s challenge is no longer one of program adoption or investment, but of system coherence. CCSPP provides an organizing vision, CA MTSS offers a logic for tiered decision making, and CYBHI supplies resources and service infrastructure. Yet without intentional redesign, these elements function as parallel efforts to each other and other student and learning support efforts, rather than as elements of a unified system.

The next phase of state policy must therefore focus on connecting the many support elements through explicit prototype development, infrastructure reengineering, sustainable replication strategies, and policy authority commensurate with the complexity of the task. Absent such a shift, California risks overemphasizing increasing access to services without addressing the underlying conditions that fragment support, marginalize well-being, and perpetuate inequities.

In contrast, with deliberate system redesign, the state has a rare opportunity to move beyond episodic reform and establish a durable, equitable, and effective system of student/learning supports capable of addressing many factors that interfere with learning and teaching.

What School Districts Can Do Now

Although many of the challenges identified in this report require state-level policy action, districts are not without agency. The following actions represent meaningful steps districts can take now to mitigate fragmentation and strengthen foundations for long term transformation of student and learning supports.

Unify Student/Learning Supports

1. Establish a Single, Unified Student/Learning Supports Leadership Structure. Districts can reduce fragmentation by consolidating leadership and decision making authority for CCSPP, MTSS, behavioral health, and other student support initiatives into a single district level structure. Toward this end, districts can:

- Establish an umbrella component to encompass all student and learning support activity.
- Designate one cross functional leadership team responsible for the unified component.
- Clarify authority and align decision rules, and accountability for initiative activity, budgeting, and data gathering.
- Require schools to mirror adoption of the umbrella component and leadership team.

The critical shift is from trying to coordinate teams and interventions to governance and leadership of a unified system.

Adopt a Student/Learning Supports Prototype

2. Adopt a Local Prototype for the Unified Student/Learning Supports System. In the absence of a fully articulated state prototype, districts can develop and document their own. A district level prototype should clarify:

- How a tiered continuum of interventions addresses (a) the many barriers to learning and teaching that schools experience daily and (b) the wide range of support needs.
- How to braid together school and community resources that address shared concerns.
- How to rework staff roles and functions and the operational infrastructure to fit the transformed system.

Even a “working” prototype can provide operational clarity for schools and improve implementation.

Embed Mental/Behavioral Health

3. Embed Mental/Behavioral Health in the Tiered Continuum of Interventions as a Critical Element in Addressing Factors Interfering with Learning and Teaching. This includes:

- Establishing shared criteria for pursuing each level of intervention and what supports are available(e.g., individual counseling, small group supports, skill building interventions, family consultation).
- Clarifying identification, referral, and case monitoring processes for individuals in need.
- Ensuring extramural funding for behavioral/mental health is accessed and does not lead to overemphasizing the provision of narrow services in place of broad system development.

This step shifts the focus on behavioral/mental health from over-emphasizing reactive service provision to being an embedded element of a system that gives priority to prevention and early intervention.

Realign Roles and Functions

4. Realign Roles and Functions to Prevent Overload and Role Drift.

Districts can audit and redesign roles to reduce burnout and inefficiency. Actions include:

- Clarifying what the unified component administrator, leadership team, and student support staff are – and are not – responsible for doing.
- Delineating lines of authority.
- Ensuring full participation in school improvement planning.
- Jointly defining role and function expectations with unions and community partners to reduce ambiguity.

Clarity of roles, functions, and lines of authority promotes accountability, task accomplishment, and personnel protections.

Braid Financing

5. Take Early Steps Toward Braided Financing.

Even without state-level finance reform, districts can improve fiscal coherence by:

- Mapping all school and community funding streams supporting student/learning supports (e.g., local and federal).
- Identifying which funds can be braided.
- Creating internal guidelines to ensure reimbursement driven services do not crowd out prevention and early intervention.

The goal is not full financial integration, but greater intentionality about ensuring dollars support system goals. Note that, between 2021 and 2025, California invested more than \$4.1 billion in CCSPP and approximately \$4.6-\$4.7 billion in CYBHI. Yet neither initiative requires unified governance or braided financing structures, allowing large investments to exacerbate parallel system development rather than systemic redesign that unifies student/learning supports.

Ensure Data for Improvement, Not Just for Compliance

6. Strengthen Data Use for Improvement, Not Compliance.

Districts can support continuous improvement of student/learning supports by:

- Broadening the accountability framework so that direct data related to addressing barriers to learning are included.
- Developing simple local protocols for data sharing.
- Training leaders and teams to use data for problem solving and adjustment, not just reporting.

Even partial data alignment improves strategic decision making.

Operationalize Equity

7. Operationalize Equity in Decision Making.

To prevent equity drift, districts can embed equity expectations into everyday practice by:

- Requiring regular review of who is – and is not – receiving needed supports.
- Monitoring whether services cluster where billing is easiest rather than where need is greatest.
- Ensuring family engagement structures have real influence over priorities and resource use.

Equity becomes actionable when it is reflected in decision rules, monitoring routines, and accountability processes.

**Enhance
Adult Learning
and System
Capacity**

8. Invest in Adult Learning and System Capacity. Finally, districts can strengthen long term capacity by prioritizing learning and capacity building for understanding, implementing, and sustaining a transformed system for addressing factors interfering with learning and teaching. This includes:

- Joint professional development for educators, student support staff, and community partners.
- Coaching and technical assistance tied to the transformed system.
- Protecting time for collaborative problem solving rather than adding new compliance demands.

Sustainable change involves not simply having adults do more, but facilitating cooperative learning focused on how to work together and in new ways.

Bottom Line for Districts

Districts cannot fully transform systems alone, but they can make a start by reducing the marginalization and fragmentation of student/learning supports. By leveraging local, state, and federal funding, ensuring leadership, adopting a local prototype, redefining personnel roles and functions, and using data and resources strategically, districts can move forward in reducing achievement and opportunity gaps.

Beyond Initiative Integration: Ending the Marginalization of Student/Learning Supports

The persistent problems confronting students and schools are complex, overlapping, and widespread. In far too many schools, the number of students experiencing emotional, behavioral, learning, and engagement problems overwhelms the capacity of existing supports.

Despite decades of effort and substantial investment, current approaches to student and learning supports remain unable to meet the scope of need. Analyses of current approaches indicate extremely limited results, redundancy in resource use, and counterproductive competition among support staff and with community-based professionals who link with schools.

Special initiatives have come and gone. Historical reliance on isolated initiatives has generally not produced sustained systemic transformation.

Fragmentation is a Symptom

Much of today's reform discourse focuses on fragmentation and efforts to integrate – align services and initiatives, coordinate agencies, and reduce duplication. While integration is necessary, it is not sufficient. Fragmentation is not the root problem; it is a symptom. What drives fragmentation is the absence of a policy framework that establishes addressing barriers to learning and teaching as a primary, essential, and unified component of school improvement. Without correcting this foundational flaw, successive initiatives – no matter how thoughtfully designed – are just layered onto an already fragmented and marginalized subsystem.

Marginalization Cripples Improvement Efforts

For too long, the many efforts to address barriers to learning and teaching have been marginalized in school improvement policy and practice. Student and learning supports continue to be treated as supplementary and auxiliary rather than as a core responsibility of schooling. This marginalization is the underlying driver of the fragmentation, redundancy, inefficiency, and limited impact that characterize current student/learning support efforts – including the newest generation of well funded behavioral and mental health initiatives.

At present, school improvement policy is guided primarily by a two-component framework (see Exhibit 2}. Within this framework, interventions to address learning barriers, reengage disconnected students, and promote well being are given secondary consideration at best. As a result, districts and schools accumulate a wide array of categorical programs, services, and special initiatives – often supported by distinct funding streams and external mandates – that operate in parallel rather than as a coherent system. Even frameworks explicitly intended to promote coherence, such as MTSS, are constrained by this prevailing architecture; they organize interventions without elevating student/learning supports to the level of a primary component of school improvement.

The consequences are predictable and well documented: overlapping roles, competing priorities, inefficient use of scarce resources, compliance driven practices, and limited reach relative to the magnitude of need. Schools may help some students, but they rarely alter the conditions that continue to interfere with learning and teaching for large segments of the student population. As long as student and learning supports remain structurally marginalized, efforts to improve outcomes will remain episodic and inequitable.

Moving to a Three-Component Framework

Ending fragmentation, therefore, requires more than better coordination or alignment among initiatives. It requires ending the marginalization itself. And ending marginalization requires an explicit policy shift – from a two-component to a three-component framework for school improvement (see Exhibit 3).

A three-component framework establishes a “Learning Supports” Component as a primary and essential facet of school improvement, on par with instruction and governance/management. This component is explicitly focused on (1) addressing barriers to learning and teaching and (2) reengaging students in classroom learning. The intent is not to add another initiative, but to unify existing programs, services, and resources into a coherent component that is fully integrated into school improvement planning, daily practice, and accountability systems.

Over time, the unified component must be deliberately developed into a comprehensive and equitable system of student/learning supports – one that prioritizes prevention and early intervention, operates in classrooms and schoolwide, and strategically weaves together school and community owned resources. Given persistent fiscal constraints, such development depends less on new funding than on rethinking, redeploying, and braiding existing resources in service of clearly articulated system goals.

Strengthening Operational Infrastructures

The move to a three-component school improvement framework calls for added mechanisms and restructuring. Exhibit 4 illustrates an operational infrastructure at the school level that fully emphasizes and integrates student/learning supports. This prototype was designed to ensure the type of interconnected leadership and workgroups necessary for daily operation and ongoing development of a unified, comprehensive, and equitable system of learning supports.

Comparable changes are needed at the district and state-level. And additional mechanisms are needed for effective school-community collaboration that enables “families” of schools to work together to increase efficiency and effectiveness and gain economies of scale.

Concluding Comments

From a policy perspective, the implication is direct and unavoidable: initiatives such as CYBHI, CA MTSS, and CCSPS cannot achieve fundamental system transformation as long as they operate within an improvement framework that treats student/learning supports as secondary. Without restructuring the framework itself, these initiatives – individually and collectively – risk exacerbating the very fragmentation, marginalization, and inequities they are intended to resolve.

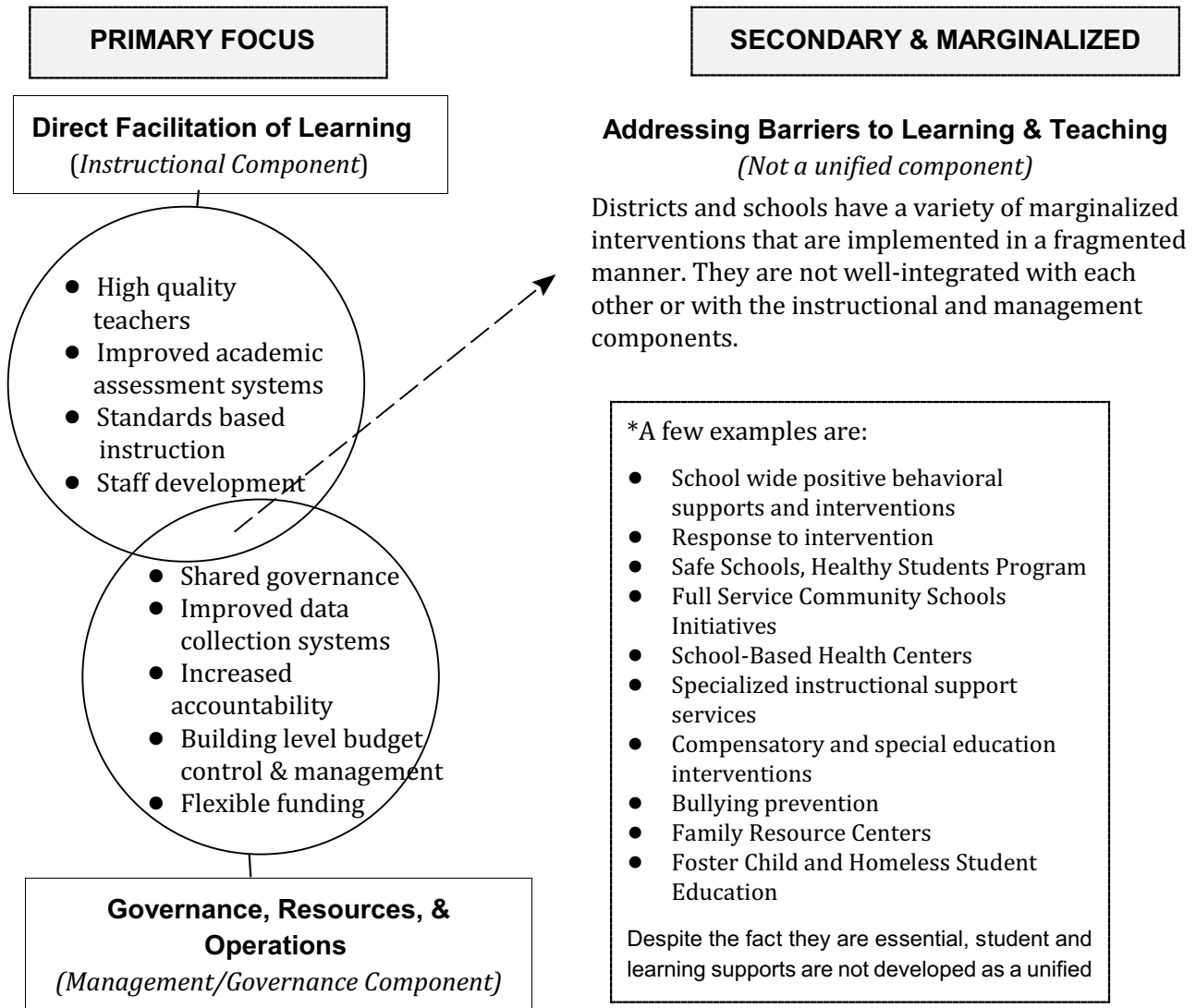
The need is for transformative system changes. These involve

- elevating the policy priority for addressing barriers to learning and teaching in a unified, comprehensive, and equitable way
- fully integrating the policy into school improvement strategic planning and daily practice
- institutionalizing mechanisms that facilitate effective development, implementation, scale-up, and sustainability of a unified, comprehensive, and equitable approach

The central challenge, therefore, is not whether current initiatives are well intentioned, well resourced, or well implemented. It is whether school improvement policy is willing to authorize and institutionalize a system that treats addressing barriers to learning and teaching as a core function of schooling. Until that shift is made, initiative integration will remain an incomplete solution – and system transformation will remain the work of a few independent trailblazers.

Exhibit 2

Prevailing Two-Component Framework Shaping School Improvement Policy



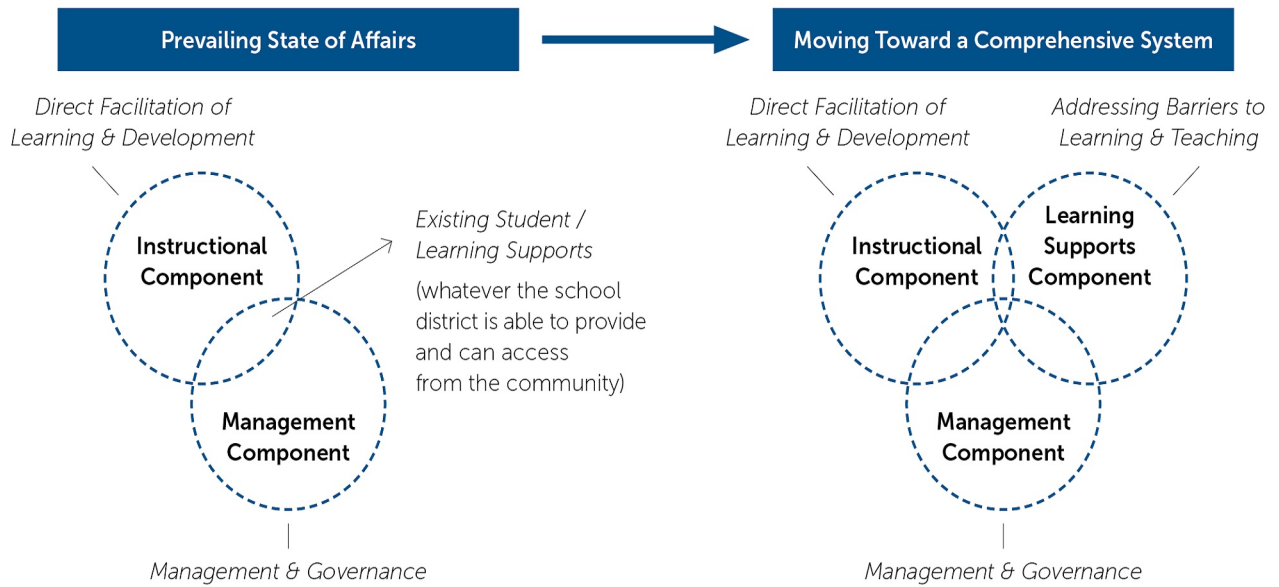
Efforts to address student and schooling problems are funded and pursued as "categorical" initiatives, some supported by school district general funds and some underwritten by the federal, state, and private sector. Overlapping what schools offer are initiatives from the *community* to link resources to schools (e.g., school-linked services, full-service schools, community and school partnerships, community schools). Some of these efforts braid resources together; however, others contribute to further fragmentation, counterproductive competition, and marginalization of student support.

Local, state, and federal agencies also have generated initiatives that play out at schools. One major focus is on promoting interagency coordination and collaboration (e.g., fostering "integrated services"); another focus is on special funding streams (e.g., ESSA funds, billing Medicaid for school health services).

The various initiatives do help *some* students who are not succeeding at school. However, they come nowhere near addressing the scope of need. Their limited potency further underscores the degree to which efforts to address barriers to learning are marginalized in policy and practice.

Exhibit 3.

Moving to a Three Component Framework

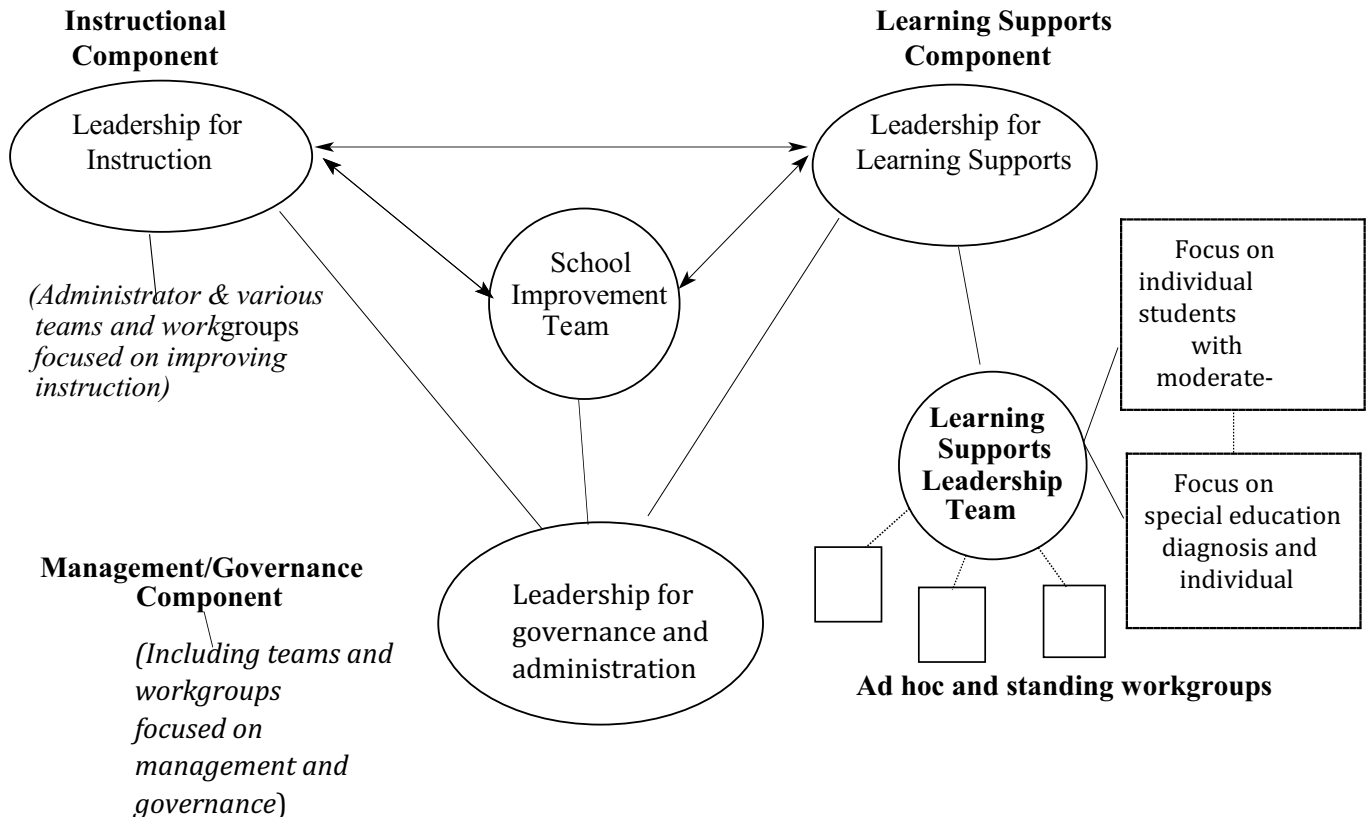


Ending the marginalization of efforts to address barriers to learning and teaching requires policy action that establishes and institutionalizes a component for addressing barriers to learning and teaching as a primary and essential facet of school improvement (on a par with the components for instruction and governance/management). As dubbed here, the “Learning Supports” Component aims at enabling learning by (1) addressing factors that interfere with learning, development, and teaching and (2) reengaging students in classroom instruction.

Exhibit 4.

Prototype for an Integrated Operational Infrastructure at the School Level

(This operational infrastructure should be paralleled at the district level, see http://smhp.psych.ucla.edu/pdfdocs/report/resource_oriented_teams.pdf)



Note: Each of the three primary and essential components for school improvement requires

- administrative leadership and other advocates/champions with responsibility and accountability for ensuring the vision for the component is not lost,
- a leadership team to work with the administrative lead on system development,
- standing workgroups with designated ongoing functions and occasional ad hoc workgroups to accomplish specific short-term tasks.

To ensure coordination and cohesion, the leaders for the instructional and learning supports components are full members of the management/governance component, and if a special team is assigned to work on school improvement, the leaders for all three components are on that team.

For additional guidance on advancing the transformation of student/learning supports, see

>Student/Learning Supports: A Brief Guide for Moving in New Directions
<https://smhp.psych.ucla.edu/pdfdocs/briefguide.pdf>

>Transforming Student and Learning Supports: Starting the Process
<https://smhp.psych.ucla.edu/pdfdocs/systemchangesteps.pdf>

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