

# COMPLY

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## Section 1 - The Federal Government

- The federal government is not expanding its role in education — it is deliberately contracting it and pushing authority down to the states.
- The data vacuum elevates state-level and public-data measurement.
- The research-institution model cannot lean on federal money

## Section 2 - The States

- Every state education department is on the same road — adopting AI plans is inevitable, because preparing students for an AI-shaped future of work and society is not optional.
- The 50 states and DC differ only in how far down that road each has traveled — from binding district-policy mandates to guidance on-ramps to not-yet-moving.
- Eight states already require a district AI policy and California's SB 1288 model policy lands July 1, 2026 — the leaders simply show the rest the route.

## Section 3 - My Child

- The teacher is not replaced. The teacher is elevated.
- The classroom is still a room. The teacher is still the human who matters.

## Section 4 - The Third Dimension

- The debate runs on two axes — data and policy. Both only measure or govern the visible. Neither is the work.
- The third dimension is AI as the instrument — the only axis that reaches the invisible: actual learning, and readiness for an AI-shaped world.
- You do not finish the plane before adding depth. The plane and the volume are raised together — now, while the policy ink is still wet.

## Section 5 - What We Can Learn From Outside Education

- Medicine's lesson: approve the process, not the product — same input, same output; different children, different interventions. The end of average.
- Business's lesson: AI is a competitive reset, not a productivity bump. Value migrates to new control points, the friction-managing intermediaries are exposed, and the window closes fast.
- Education has not yet faced this — it does not have a Moderna yet. The next decade rewards whoever builds the process, with every child visible to the agent layer.

## Section 6 - Georgia

- Georgia's 180 boards face a rising legislative tide — literacy laws, device bans, AI guidance, and HB 1302 rebuilding its data governance, each a new compliance surface.
- GSBA built the machine to carry that load — eBOARDsolutions/Simbli — and exported it; in California it is CSBA's GAMUT, running on simbli.eboardsolutions.com.
- Georgia already owns a P-20W data spine (GA•AWARDS) whose governance HB 1302 is redrawing now — yet it never built the classroom instrument on it, and still cannot see the oral-written delta.

## **Section 7 - California**

- The substrate decision comes down to two bill numbers: SB 1288, the model AI policy due July 1 (the product), versus AB 2225, CSBA's achievement-gap plan now in the Senate (the process).
- California spends ~\$138 billion on TK-12 and cannot tell which fraction reaches the child — the oral-written delta is the biopsy neither the model policy nor the dashboards contain.
- CSBA holds both ends: it sponsors the process bill and licenses the Georgia product. It is the institution best positioned to be education's Moderna — or to keep selling the product while another builds the substrate first.

## **Section 8 - Collaborating with Georgia State University**

- The third dimension is provable, not speculative — Georgia State already holds the team and the data, and they already co-publish.
- The oral-written delta is computable from data Georgia already collects — ACCESS for ELLs Speaking vs. grade-3 Milestones ELA — pulled through GA•AWARDS at no cost to districts.
- The proposed study (Greenberg as prospective PI, H-EDU partner) traces grade-3 cohorts to early-career wages. The university brings the rigor; H-EDU brings the upstream direction.

## **Section 9 - The Proof**

- The argument is no longer hypothetical: VERA is built and live at h-edu.solutions in all fifty states and DC, computing the oral-written delta (Type 4) against each state's own assessment.
- 55 jurisdictions across 6 countries, federated — the delta travels: NAPLAN, NCEA, STEP, NT2, and DLA alongside the US battery.
- Both sides shipped: VERA (Type 4 detection, LCAP verification, teacher observation, MCP query) and VERA Comply (the SB 1288 six-module product). The infrastructure exists; the question is will.

## **Conclusion**

- No nonsense: H-EDU does both sides of the plane — and adds the dimension beyond it.
- Policy side: examine every district's policies against all AI requirements and deliver AI-compliant new policies at scale.

- Data side: manage the data AB 2225 calls for, incorporate the oral-written delta, and go beyond — live child-level data plus the teacher's daily review, producing AI-infused teaching and the learning tomorrow's work and society require.

# Starting at the Top: The Federal Government and Education

June 26, 2026

That's the right place to start, because the federal layer is the one that reframes everything beneath it. Here's the top of the pyramid as the search establishes it, and why it sets the terms for every level below.

**The defining federal fact right now is retreat and devolution.** The federal government is not expanding its role in education — it is deliberately contracting it and pushing authority down to the states. Trump's May 2025 executive order directs the closure of the Department of Education and the return of education authority to the states; Secretary McMahon has described the department's "final mission" as shuttering itself, and in November 2025 she began outsourcing its functions to other agencies. That is the posture: Washington stepping back, on purpose.

**The research and data spine of federal education has been hollowed out.** This is the part that matters most for your work. IES lost roughly 90% of its staff (from ~191 down toward 30, and per the June 24 Inspector General report, to about 16% of pre-administration levels); somewhere between \$881 million and \$1.1 billion in research grants and contracts were canceled; and NCES — the statistical agency that has run federal education data for 150 years — was reduced to about three people. The Supreme Court let those layoffs stand in July 2025. New IES funding is frozen, and the longitudinal studies are under review for cuts. The one survivor is NAEP, the Nation's Report Card — the only collection named in statute — which is being kept on track by loaned staff, and whose 2024 results (grade 4 and 8 reading down about five points since 2019) are the very numbers driving the state literacy wave.

**On AI, the federal move is deregulatory — but with a carve-out that protects your market.** Executive Order 14365 (December 11, 2025) tries to preempt and discourage state AI laws indirectly, through a DOJ task force, FTC and FCC action, and conditioned funding. It is not self-executing, so state AI laws remain enforceable in the near term — and, critically, it expressly preserves state authority over child safety, data-center infrastructure, and **state government procurement and use of AI**. School AI-policy and procurement — COMPLY's exact target — sits inside that protected zone.

**Now the "so what," which is the whole reason to start here.** The federal top is characterized by withdrawal, and withdrawal at the top forces everything downward. Three cascades follow directly:

The data vacuum elevates state-level and public-data measurement. As the federal statistical apparatus degrades, reliable national data thins out — which raises the value of tools that run on state and public data with no federal dependency. VERA is built exactly that way: it operates on public CDE/state data and needs nothing from NCES.

The research-funding source shifts. IES was the historic funder of the Greenberg/ALRC/GPAER line and the federal SLDS grant program. With it frozen, the research-institution model cannot lean on federal money — it has to run on state, university, and philanthropic funding. That's not a setback so much as a clarifier: it tells you the research lane's money must come from Stanford/SCALE-type partnerships, philanthropy, and state contracts like AB 2225, not Washington.

The center of gravity moves to the states. Authority, accountability, and — by attrition — data and research capacity are all migrating from Washington to state capitals. That is the single largest structural tailwind for your entire model, because your channels are state-level: CSBA, GOEWS, state legislatures, state universities. The federal retreat is the reason the state layer matters more, not less.

That's the top. Working down, the next level is the **states stepping into that vacuum** — the four currents (AI policy, science-of-reading literacy, longitudinal data systems, achievement-gap accountability) that are the national pattern of states building what the federal government is abandoning. Below that sits your two focus states and their specific mechanisms, then the institutional channels, then the products and the named plays.

## **Appendix — Acronyms and Full Translations**

*Acronyms appearing in this document, with their full forms.*

**AB** — Assembly Bill (California state legislation; e.g., AB 2225)

**AI** — Artificial Intelligence

**ALRC** — Adult Literacy Research Center (Georgia State University)

**CDE** — California Department of Education

**COMPLY** — H-EDU.Solutions' AB 2225 AI-policy compliance product (a product name, not an initialism)

**CSBA** — California School Boards Association

**DOJ** — (U.S.) Department of Justice

**FCC** — Federal Communications Commission

**FTC** — Federal Trade Commission

**GOEWS** — Governor's Office of Education and Workforce Strategy (Georgia; formerly GOSA, the Governor's Office of Student Achievement)

**GPAER** — Georgia Partnership for Adult Education and Research

**IES** — Institute of Education Sciences (U.S. Department of Education)

**NAEP** — National Assessment of Educational Progress (the “Nation's Report Card”)

**NCES** — National Center for Education Statistics

**SCALE** — Stanford Center for Assessment, Learning, and Equity (now operating as the SCALE Initiative at Stanford)

**SLDS** — Statewide Longitudinal Data System

**VERA** — Verification Engine for Results & Accountability (H-EDU.Solutions' platform)

# Section 2 - The States

One Road: Every State Education Department Is Moving to Adopt AI Plans

June 26, 2026

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**Every state education department is on the same road.** The question this section answers is not which states are addressing AI and which are ignoring it — because none can ignore it. Preparing students for the work and society they will actually enter is the non-negotiable charge of public education, and that future is being rewritten by AI. A state that declines to adopt an AI plan is not opting out of AI; it is opting out of preparing its students, and no department will do that. So the 50 states and the District of Columbia are not a map of haves and have-nots. They are a single road, and what differs is only how far down it each one has traveled.

**This is why AI is the third dimension.** Measuring outcomes — data — tells you where a student stands. Understanding circumstances — conditions — tells you why. But neither prepares the student for what comes next. AI is the instrument that runs through the entire circle of education — family, teacher, student, community — and equips the student for the requirements of work and society ahead. A state AI plan is not a technology policy bolted onto the side of education; it is the mechanism by which a state discharges its core obligation in an AI-shaped world. That is why adoption is universal and inevitable, and why the only real variable is timing.

**Read the map below as motion, not membership.** Each jurisdiction is placed at the furthest stage it has reached — from those that have already made a district AI policy a legal duty to those that have not yet visibly moved. Every one of them will arrive. The leaders simply show the rest the route — and they show COMPLY exactly where the obligation is already real and dated.

## Stage 1 — Mandate or state model policy.

*Farthest along: a district AI policy is already a legal duty, or about to be.*

- **California** — SB 1288 — state model AI policy due July 1, 2026; districts build from it. The COMPLY anchor.
- **Idaho** — SB 1227 (enacted) — statewide generative-AI framework; districts must adopt aligned policies.
- **Maryland** — SB 720 (enacted), AI Ready Schools Act — district policies, AI coordinators, statewide collaborative, tool certification.
- **Ohio** — HB 96 (enacted 2025) — districts must adopt AI policies.
- **Oklahoma** — SB 1734 (enacted) — every district a written AI policy before 2027–28; human-in-the-loop; parental opt-out.
- **Tennessee** — SB 1711 (enacted 2025) — districts must adopt AI policies.
- **Virginia** — HB 1186 (enacted) — AI Innovation in Education Pilot; districts adopt aligned policies.
- **South Carolina** — HB 5253 (pending) — district policies, parental opt-in, annual disclosure.

- **West Virginia** — HB 5205 (pending) — the State Board's model policy auto-applies to any district that fails to adopt its own by July 2027.

## Stage 2 — AI law on the books.

*An AI-in-education statute enacted, though not yet a district-policy mandate.*

- **Alabama** — HB 329 — a computer-science course including AI required to graduate (plus a department AI policy template).
- **Mississippi** — SB 2426 (2025) — created a state AI task force (plus department guidance).
- **Utah** — HB 218 and HB 273 — grade 7/8 digital-skills/AI-literacy course and AI in CS standards; SB 322 (AI sandbox) pending; plus guidance.

## Stage 3 — Legislating now.

*Bills moving toward law this session.*

- **Arizona** — HB 4005 — AI ethics instruction.
- **Florida** — HB 1503 / SB 1694 — AI within computer-science coursework.
- **Hawaii** — SB 2212 (AI-literacy course), HB 2466 (curriculum), HB 1676 (task force); plus guidance.
- **Illinois** — HB 4411 (CS + AI graduation), HB 5113 (best-practices commission).
- **Iowa** — HSB 610 / HF 2540 / SF 2094 — CS + AI graduation, class of 2030–31.
- **Missouri** — HB 3139 — AI in the CS definition; half-unit graduation requirement (2027–28); plus guidance.
- **New Jersey** — A 4352 / S 2862 — AI within computer science.
- **New Mexico** — HB 330 — AI ethics computer-science elective; plus guidance.
- **New York** — A 9190 (bar most classroom AI below ninth grade), A 6972 (State Education Department AI working group).
- **Vermont** — HB 650 — edtech providers must register and certify privacy, including AI features.

## Stage 4 — On the on-ramp.

*A department has issued AI guidance — explicitly to help districts build toward policy.*

- **Alaska** — K-12 AI framework (October 2025).
- **Colorado** — AI roadmap for K-12.
- **Connecticut** — Commission for Educational Technology guidance.
- **Delaware** — Guidance plus a January 2026 AI Education Summit.
- **Georgia** — Guidance that explicitly includes a “Process for Districts to Adopt AI Policies.”
- **Indiana** — Department AI guidance.
- **Kentucky** — Department AI guidance.
- **Louisiana** — Department AI guidance.
- **Maine** — Interactive AI Guidance Toolkit (February 2025); integration study due spring 2026.
- **Massachusetts** — Department guidance (August 2025).
- **Minnesota** — Department AI guidance.
- **Montana** — Department guidance (October 2025).

- **Nevada** — Department AI guidance.
- **North Carolina** — Guidance plus recurring educator AI summits.
- **North Dakota** — K-12 AI guidance framework.
- **Oregon** — Department AI guidance.
- **Rhode Island** — Department guidance (August 2025).
- **Washington** — Human-centered AI guidance.
- **Wisconsin** — Department AI guidance.
- **Wyoming** — Guidance written expressly “to help districts develop AI-use policies.”

### **Stage 5 — Not yet visibly moving.**

*Nothing surfaced in the trackers — earlier on the same road, not off it.*

- **Arkansas** — A 2025 state AI task-force report exists; no department guidance among the 31 and no classroom-AI statute identified.
- **District of Columbia** — None identified in the trackers.
- **Kansas** — None identified.
- **Michigan** — None identified for AI (active on literacy/dyslexia).
- **Nebraska** — None identified.
- **New Hampshire** — None identified.
- **Pennsylvania** — Not among the 31; the department has issued some material — flag for verification.
- **South Dakota** — None identified.
- **Texas** — General TRAIGA AI law effective January 1, 2026, but not education-specific.

**Coverage note.** Stage placement reflects the furthest instrument each jurisdiction has reached, drawn from FutureEd’s June 10, 2026 legislation tracker, Ballotpedia’s January 2026 count of 31 guidance states, and the enacted 2025 laws in Ohio and Tennessee. “Not yet visibly moving” means nothing surfaced in those sources as of June 2026 — not a guarantee a state has zero local or very recent activity. Pennsylvania and Arkansas are worth verifying directly before this review goes outward.

**What it means for COMPLY.** COMPLY is built for the whole road, not just the leaders. The Stage 1 states are where the obligation is already enforceable and dated — the immediate market. But the guidance states are not a different category; they are the same road, earlier, and their own documents say so: Wyoming’s exists “to help districts develop policies,” Georgia’s contains a “Process for Districts to Adopt AI Policies.” Guidance is the on-ramp to the mandate. Every jurisdiction on this list is a present or future customer for what COMPLY provides — the leaders define the timeline, and the federal retreat in Section 1 guarantees the responsibility stays with the states.

**Sources:** FutureEd, “Legislative Tracker: 2026 State AI in Education Bills” (updated June 10, 2026); Ballotpedia, “AI guidance issued by state departments of education” (as of January 2026); plus enacted 2025 laws in Ohio (HB 96) and Tennessee (SB 1711).

# Section 3 - My Child

October 20, 2028

*Vision without a concrete picture is just rhetoric. So let me describe a single day in the life of one child in the 2028 classroom, in enough detail that the design decisions are visible.*



Maya is nine years old, in third grade, at an elementary school somewhere in California on October 20, 2028. She arrives at 7:52 AM. As she comes through the front gate, the school's sensing infrastructure — cameras above entrances, Wi-Fi location logging on her school tablet — registers her arrival as an anonymized identifier. The system is not secret. Her parents received plain-language disclosure when she enrolled. They have a parent portal where they can see their own child's data.

They have meaningful opt-out options. They chose in. The governance principles are explicit: data is aggregated before it is useful, individual records are accessible only to named staff with specific operational need, vendors do not own the data or use it to train commercial models, the district is custodian and the district is accountable. These principles are not negotiable. They are the reason the system is defensible.

Maya walks toward her classroom. The system notices she is walking alone, as she has walked alone for the past eleven school days — a pattern change from the previous months when she walked with a cluster of three other girls. The pattern-detection system does not alert the principal dramatically. It surfaces on the morning dashboard of her teacher, Ms. Rivera, a short

list of children whose social-contact patterns have shifted in the past two weeks. Maya is on that list. Ms. Rivera sees her name and understands what the shift means, because Ms. Rivera is the human in the loop — the adult whose job is to notice what the system surfaces and to decide what to do about it.

At 8:05, at the start of the morning's reading block, Ms. Rivera sits down next to Maya and asks her what she is reading. She listens. She follows up on something Maya mentioned last week about her grandmother's garden. Five minutes of attention, directed by the data toward the child who most needed it, produced without any intrusive adult gaze, uncovered only because the measurement infrastructure revealed the pattern and the human adult acted on it. This is the memorable-teacher function operating with tooling it has never had before.

At 8:30, the morning's panels rearrange themselves around the perimeter of the classroom. Ms. Rivera is seated at her desk, looking at her pixel-cluster display.

Each of her 28 children is represented as a cluster whose color and pattern indicate their current state: engaged, struggling, distracted, in flow. The boards around the room are configured for the morning's range of learning tasks — one panel running a phonics scaffold at Maya's exact reading level, another running a writing workshop for the six children ready for it, another running math through stories, another open for free reading with AI reading-companions. Children can remain in their seats working on individual devices, or they can walk over to the panel that interests them most. Some walk. Some stay. Some cluster at panels. Some work alone. The classroom is a coordinated heterogeneous environment, not a synchronized homogeneous one.

Maya walks to the reading panel. She finds herself standing next to Mateo, whom she has not spoken to in six weeks. They read together at the panel's prompting. The platform observes that Maya's reading pace has improved since last Tuesday and adjusts the difficulty slightly. Ms. Rivera, watching from her desk, sees Maya's pixel cluster shift into the engaged-and-progressing state and registers, without making a fuss, that her 8:05 intervention worked.

At 11:45, the children go to lunch. The sensing system logs arrivals in the cafeteria. Maya pauses for a moment — a moment Ms. Rivera would never have seen — scanning the tables. She sees Mateo at a table with two other children. She walks over and sits down. The pattern-detection system notes that Maya has joined a table for the first time in 12 school days.

While the children eat and then go to recess, Ms. Rivera sits down with her own lunch at 11:50. Her display is in front of her. The platform has prepared her lunchtime briefing. For each of her 28 children, it summarizes the morning: what the system flagged, what the system observed, what her decisions produced.

Diego's entry shows a morning math assignment that went badly, with the platform hypothesizing a misunderstanding of a prior concept rather than the current one and recommending reassignment. Aisha's entry flags an anomaly — high engagement but unusually thin written output — without interpretation, leaving the judgment to Ms. Rivera.

By 12:25, Ms. Rivera has reviewed the briefing, affirmed some recommendations, overridden others based on her knowledge of specific children, and the afternoon's configuration has been adjusted to what the morning revealed. This is the same-day feedback loop no industrial-era teacher has ever had, and it is the mechanism that makes designer education actually responsive rather than theoretical.

At 12:30, the children return from recess. Ms. Rivera calls them in and asks them to stand beside their seats. 'Simon says hands on your head.' Hands go up. 'Simon says hands on your shoulders.' Hands move. 'Touch your knees.' Two children bend; the rest catch the trap. The room laughs.

'Simon says hop on one foot.' The room hops. Ms. Rivera is reading the room even as she plays. She sees Diego laughing, which is a good sign after his difficult morning. She sees Aisha participating fully. She sees Maya laughing next to Mateo. The three-minute game ends. The children sit. The afternoon panels begin to configure themselves.

Nothing in this scene requires magical technology. Every element is achievable on capabilities already in production use by 2026. The classroom is still a room. The teacher is still the human who matters. The building is still load-bearing infrastructure for working families. The socialization is still happening. The civic function is still being served. The budget is flat because Ms. Rivera is not spending her morning delivering phonics instruction to 28 children simultaneously; the platform is delivering differentiated phonics at each child's level, and Ms. Rivera is doing the uniquely human work her training and experience now prepare her for.

The teacher in this vision is not replaced. The teacher is elevated. Her physical demand is reduced — she is not standing for six hours. Her cognitive demand is concentrated on judgment and attention rather than undifferentiated volume. Her feedback loop is visible — she sees her interventions work. Her grading burden is gone — the platform grades routine work in seconds and surfaces for her judgment only the work that requires it. Her evenings and weekends belong to her family. The profession that the industrial-era classroom ground down to exhaustion by year seven becomes, in 2028, a profession a thoughtful person can do for a lifetime without burning out. The compensation and credentialing structures must follow this redefinition. A teacher whose work is orchestration, judgment, and relationship is doing harder and more consequential work than a content-delivery teacher. These reforms follow from the architectural shift; they do not precede it.

# Section 4 - The Third Dimension

Beyond Data and Policy: AI as the Instrument, Not the Subject

June 26, 2026

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In Section 3 you watched the third dimension at work. Maya's day was not a story about a better app or a stricter rule. It was a classroom operating in a dimension the current debate has no word for — and that missing word is the reason the debate keeps circling the same two points.

The national conversation about AI in education runs on two axes, and only two. The first is data — measurement, analytics, dashboards, and the privacy rules that surround them. The second is policy and procedure — governance frameworks, acceptable-use rules, model policies, oversight. Walk into any convening in 2026 and that is the entire floor plan: measure it, and govern it. Both axes are necessary. Neither one is the work.

Look at what each axis can actually reach. Data analysis measures the visible — the score, the dashboard, the picture. Policy and procedure governs the visible — who may use which tool, with what disclosure, under what audit. These are the two dimensions of a plane, and a plane has no depth. You can perfect the measurement and perfect the governance and still not have moved a single child, because the plane never touches the thing that actually prepares her.

The third dimension is AI as the instrument, not AI as the subject. Not the thing being measured. Not the thing being governed. The thing doing the work — the platform that delivers the right intervention to the right child at the right moment, the daily loop that turns this morning's signal into this afternoon's lesson, the measure that surfaces the child a once-a-year test renders invisible. Teaching is visible; learning is invisible. The first two dimensions can only ever inspect what is visible. The third dimension is the only one that reaches the invisible — the actual learning, and the readiness to think and work in a world that will be saturated with these tools.

The instinct of every system is to finish the plane first — complete the data architecture, finalize the model policy — and add the depth later. That instinct guarantees the depth is never built. Policy does not finish: SB 1288's model policy will be revised, and revised again. Data integration does not finish: there is always one more system to connect. If the rule is finish the floor, then build, the building never starts. And the technology is not waiting on the policy calendar — it is moving on the 2028 clock you just saw in Maya's classroom.

So the plane and the volume are not sequential phases. They are raised together. You add the third axis now, while the policy ink is still wet, because that is the only window in which the third dimension gets designed on purpose — by educators, for children — rather than arriving pre-built from whoever moved first. Wait for two dimensions to be complete and you will inherit the third from someone who did not.

This is the through-line of everything in these pages. The federal retreat hands the question to the states. The states' policy road builds the floor. Maya's day is that floor with depth added.

What remains is to show where the depth gets built first — and why California and Georgia are where the third dimension is ready to stand up.

# Section 5 - What We Can Learn From Outside Education

Medicine's Architecture, Business's Strategy

June 26, 2026

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Education keeps trying to solve education from inside education. It convenes educators, studies educational research, writes educational policy, and is forever surprised when the gap it has measured for thirty years refuses to close. But almost every answer the sector is reaching for has already been worked out — not in education, but in other regulated, information-based, life-shaping sectors that took one idea seriously and built around it deliberately. The idea is that the substrate is information. Two of those sectors are worth importing whole. Medicine gives us the architecture. Business gives us the strategy.

Start with medicine, because medicine has just lived through the transition education is now entering. Moderna's Stéphane Bancel reduces his field to a single claim: biology is, in his words, 'only information.' Not biochemistry, not molecular interaction — information. Your DNA is information; cancer is that information gone unstable; treatment is the act of telling the immune system which specific instability to correct. Different information for different patients with the same diagnosis, made through one shared process.

That reframe ends the analog era of medicine — the century in which, as Bancel describes it, drug development was trial and error, throwing enough at the wall to see what stuck and carrying the survivors to patients. That sentence describes the industrial era of medicine. With almost no translation, it also describes the industrial era of school.

Because education is information too. A student's learning trajectory is information. The achievement gap is the measured distance between the information we intended to transfer and the information that actually landed. The English learner whose spoken English runs two grade levels ahead of her written English is an information-flow mismatch — and the absence of any instrument to detect that mismatch is the educational equivalent of having no biopsy, no biomarker, no early screen. The child grows. The mismatch compounds. The intervention, when it finally comes in eighth or ninth grade, costs far more than the early one would have.

Medicine's answer was the end of average. Diagnosed by the same doctor on the same day with the same cancer, you and I now receive chemically different drugs, because the underlying instability is different in each of us. The educational parallel is exact. Two third-graders carrying the same nominal label — struggling reader, English learner, intervention candidate — need different instruction, because the information-flow mismatch underneath the label is different in each. One has strong oral comprehension and weak written production. One has the reverse. One decodes but cannot infer; one infers but cannot decode. The industrial classroom gives them all the same thing, 'more reading,' because it cannot see the difference. The oral-written delta is the biopsy it is missing.

Here is the move that matters most, and the one education has never made. When every patient receives a different molecule, you cannot get the drug approved — so Moderna gets the process approved instead. It proves to the regulator that the same input always yields the same output: feed in a given patient's information, get back a given medicine, every time. Approve the process, and the products take care of themselves.

Education has spent thirty years doing the opposite — approving products. A single test, a single dashboard, a single intervention category, handed down for every district to deliver to every child. Each one standardized the product and missed the specific child who needed the specific thing. The gap did not close. Approving better products was never going to close it, because the problem was never the product. It was the absence of a process.

Two corollaries follow, and both are operational, not rhetorical. First, measurement is the substrate, not an afterthought — Moderna does not run a trial without a manufacturing process, and a school system should not run without a measurement substrate fine enough to see the individual child. Second, prevention replaces remediation as the economic logic. Catch the cancer at stage one and the odds rise while the cost falls; flag the third-grader's oral-written delta before the literacy gap compounds and the same arithmetic holds. The instruments to do this exist now. The choice not to deploy them is the educational equivalent of declining to screen.

And the work itself gets reinvented. Bancel's most telling design decision is that Moderna's head of HR is also its head of digital — because in a world of AI and robotics the real question is not how to govern the tools but how to remake the work the humans do. Education's version is the teacher's day. You saw it in Section 3: not one adult delivering one lesson to thirty children for six hours, but one adult orchestrating many AI-augmented modes at once, doing the parts only a human can. Every district will soon carry a policy line requiring teachers to adapt instruction with AI. None has yet rewritten the workday in which that adaptation is actually possible.

Now the second sector. If medicine supplies the architecture, business supplies the strategy — and the strategic warning is blunt. AI is not a productivity revolution. It is a competitive reset. The firms that win the next decade are not the ones that adopt AI fastest; they are the ones that see earliest where value is moving and position themselves at the new control points before the equilibrium hardens.

Value moves in three waves. The first is productivity — automating and accelerating existing work. It rarely produces durable advantage, because competitors match it and the gains flow through to customers. The second is differentiation — genuinely new products and models, which build moats only when protected by proprietary data or network effects. The third is transaction-cost compression — the radical collapse of the costs of search, comparison, switching, and coordination once agents do that work at near-zero marginal cost. The third wave is where market structures themselves change, where intermediaries are bypassed, and where value migrates to whoever holds the new control points.

Map that onto schooling and the picture is uncomfortable. Wave one is the teacher with an AI tool who gets hours back and builds no lasting edge. Wave two is already running at the

system's edges, where new models redesign the cost and time structure of school around AI as the engine rather than the supplement. Wave three is the one the sector does not want to name: public education is, by design, drenched in transaction costs — adoption cycles, procurement code, compliance reporting, the information asymmetry between family and school — and every layer of intermediary exists to manage some friction below it. When agents compress that friction, the friction-management business is the one most exposed. The vendors who built quietly attractive, multi-state businesses on the friction of policy compliance are sitting precisely where the water is rising.

Business has seen this movie, and it has a moral: the losers were not the slow adopters. They were the ones who mistook efficiency for advantage — who optimized while their rivals reinvented, cut costs while their rivals captured the market. When the dust settled, the winners were the ones who understood earliest where value was moving and moved to hold it. The window for that move is open now and does not stay open. In an AI economy, advantage compounds early and value capture locks in fast.

There is one place the business framework goes silent, and in education it is the most important place: who is left out. In an agent-mediated world, the child whose family can deploy a capable agent to weigh every option on her behalf will get options. The child whose family cannot will get the default — and in an agent-mediated world the default is whatever gets assigned in the absence of an advocate. The remedy is not to slow the agents down. It is to build the public infrastructure that puts every child into the data — measured, visible, reachable by an agent acting for her — whether or not her family has the resources to advocate. That is what public infrastructure has to mean now.

Put the two lessons together and the conclusion is hard to avoid. Medicine has already shown what a regulated, information-based, life-shaping sector looks like when it takes the substrate seriously and builds deliberately: the science is real, the costs fall, the outcomes improve, and the institutions that organized around the information frame early are the ones now shaping the architecture. Education has not yet faced this. It still has districts, county offices, agencies, associations, and vendors producing better products — and the next decade will not reward better products. It will reward whoever builds the process: the measurement substrate, the early screen, the differentiated intervention, the agent-layer visibility for every child, the reinvented workday. Education does not have a Moderna yet. Where that gets built first — and which institution builds it — is what the sections that follow are about.

# Section 6 - Georgia

The Legislative Tide, and the Machine GSBA Built to Carry It

June 26, 2026

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Start with what Georgia's school boards are actually up against. Georgia has 180 local school districts, and the state legislates education hard and often. In the space of three years the General Assembly has rewritten the rules of reading instruction, pulled phones out of classrooms, stood up the apparatus to govern artificial intelligence, and — in the same 2026 session — rebuilt the governance of its own education data. Every one of those statutes lands as a fresh compliance surface on the same 180 boards.

Reading came first. HB 538 (2023) wrote the science of reading into law: state-approved instructional materials and universal reading screeners three times a year for every K-3 student, dyslexia included. HB 307 (2025) hardened it — banning the 'three-cueing' method, dropping Reading Recovery from the approved list, and requiring districts to notify parents within fifteen days when a child is flagged. Then HB 1193, the Georgia Early Literacy Act of 2026, signed by Governor Kemp on May 5, put a literacy coach in nearly every K-3 school — roughly \$70 million for some 1,300 coaches — created a statewide Literacy Task Force, and required every district to adopt a unified literacy plan. Three laws in three years, each one a new policy every board must adopt, document, and prove.

Then devices: HB 340 (2025) removed personal electronic devices from K-8, and HB 1009 (2026) extended the ban through grade twelve. Then AI. In January 2025 the Georgia Department of Education issued "Leveraging AI in the K-12 Setting," drawing the line between high-stakes and ordinary uses — no AI for IEP goals, educator evaluations, or subjective grading; yes for lesson planning, rubric drafting, and multiple-choice grading — and building district self-check steps into the document, a process for districts to stand up their own AI policies. The state named an AI ethics and impact officer that same month and carried a 2024 task-force report urging phased AI policy. This month — June 2026 — the Georgia Department of Audits and Accounts reported that 95 percent of the state's teachers already use AI to plan instruction, more than half of them weekly. The Superintendent's posture is the whole stance in a sentence: AI should always be a tool, never a replacement.

Read that list and notice what it is. Every item on it is the plane from Section 4 — measure it, govern it. Screeners and audits on one axis, policies and self-checks on the other, executed about as diligently as any state in the country executes them. And executed diligently, it is a crushing administrative load. A small district's board must adopt, version, maintain, and demonstrate compliance with dozens of mandated policies, and the legislature adds more every session. That load — not the politics of it, the sheer clerical weight of it — is the problem the Georgia School Boards Association exists to solve.

GSBA is the membership and advocacy body for those 180 boards. It lobbies the General Assembly on precisely these bills, and then it has to help its members live underneath them.

More than twenty-five years ago it began building software to carry that weight, and in 2007 it incorporated the work as eBOARDsolutions, Inc. The product, Simbli, runs six modules — Meetings, Policy, Planning, Evaluations, Communications, Documents — and the load-bearing one is Policy: a single place to adopt, update, search, and prove board policy against the mandates. GSBA built, in other words, the machine for managing exactly the legislative tide just described.

That machine did not stay in Georgia. eBOARDsolutions now serves more than 2,000 organizations across 32 states at roughly a 99 percent renewal rate — 173 of Georgia's own districts among them. And in California it wears a different name. CSBA's GAMUT — the policy, agenda, and meeting service California's districts run on — is Simbli. Follow a California district's board-policy link and it resolves to [simbli.eboardsolutions.com](http://simbli.eboardsolutions.com); CSBA's own mandated-policy chart is served from the same domain. The policy infrastructure of the nation's largest public-education system is a Georgia product, licensed and rebranded.

This is the intermediary Section 5 named, in the flesh. A single governance-technology incumbent, born of policy-compliance friction, sitting on the policy-compliance chokepoint across 32 states — a business whose entire value is the management of the very transaction costs the Coasean wave is built to compress. eBOARDsolutions is not the villain of this story; it is the best-built expression of the two-dimensional plane there is. It is also, for that exact reason, the layer most exposed the moment the plane stops being mistaken for the work.

And here is the irony worth sitting with. Georgia does not merely measure aggressively — screeners three times a year, dyslexia flags, unified plans, a fresh state audit of AI in its classrooms. It already owns the data backbone the third dimension would run on. GA•AWARDS — Georgia's Academic and Workforce Analysis and Research Data System — is a Pre-K-through-workforce longitudinal spine that links student- and teacher-level records across more than a dozen state agencies, from early care through K-12 to the technical colleges and the labor department, with a single identifier that follows a child across time. It was seeded by a federal Statewide Longitudinal Data System grant in 2009 and expanded under Race to the Top, Georgia's \$400 million 2010 award, whose plan made completing that spine a pillar — with the explicit aim that teachers would use real-time, student-level data to improve their instruction. Georgia is modernizing it now into a cloud-native platform branded My Georgia Insights. And in May 2026, HB 1302 — the Education and Workforce Strategy Act — renamed the office that runs it from GOSA to GOEWS, dissolved the Alliance of Education Agency Heads that had governed it, and stood up a new cross-agency Education Data Governance Board. The backbone is not only being rebuilt; its governance is being redrawn, this year, in real time.

Fifteen years after that promise, it remains unkept. GA•AWARDS is gated to approved researchers and surfaced to the public only as aggregate dashboards — graduation rates, earnings, discipline. The student-level spine exists; the classroom instrument that would run on it does not. And nothing in it measures the oral-written delta — the child whose spoken comprehension runs grade levels ahead of her written production. So the state that builds the nation's policy machine, and that already owns a longitudinal data backbone most states would envy, still cannot see the specific mismatch underneath the struggling-reader label. The biopsy

is missing not for lack of a laboratory — the laboratory is built, and being rebuilt. The instrument was simply never made. In two dimensions the picture is immaculate. The third is still absent.

Which is the whole problem in miniature, and it points west. The Georgia engine runs California's policy layer, and California is now deciding — inside a single legislative session — whether to keep perfecting the plane or finally build the substrate. That decision comes down to two bill numbers, and it is the subject of the next section.

## Appendix: Acronyms & Terms

**AI** Artificial Intelligence.

**CSBA** California School Boards Association.

**eBOARDsolutions** GSBA subsidiary, incorporated 2007, that develops and licenses the Simbli platform.

**GA•AWARDS** Georgia's Academic and Workforce Analysis and Research Data System; the state's Pre-K-through-workforce (P-20W) longitudinal data system.

**GaDOE** Georgia Department of Education.

**GAMUT** CSBA's board-governance and policy platform for California districts; runs on the Simbli platform.

**GOEWS** Governor's Office of Education and Workforce Strategy — GOSA, renamed and expanded under HB 1302 (2026); operates GA•AWARDS.

**GOSA** Governor's Office of Student Achievement — the prior name of GOEWS.

**GSBA** Georgia School Boards Association.

**HB 1302** Georgia Education and Workforce Strategy Act of 2026; created GOEWS and a cross-agency Education Data Governance Board.

**HB / SB** House Bill / Senate Bill.

**HQIM** High-Quality Instructional Materials.

**IEP** Individualized Education Program.

**K-3 / K-12** Kindergarten through grade 3 / through grade 12.

**MSV** Meaning-Structure-Visual cueing ('three-cueing'), the reading method barred by HB 307.

**My Georgia Insights** GaDOE's modernized, cloud-native rebuild of the state longitudinal data system (Ed-Fi standard, 2024-25).

**oral-written delta** The gap between a student's oral comprehension and her written production — the mismatch Georgia's screeners and data system do not capture.

**P-20W** Pre-K through workforce — the span a statewide longitudinal data system covers.

**SLDS** Statewide Longitudinal Data System (the federal grant program and the systems it funds).

**Simbli** eBOARDsolutions' six-module board-management software: Meetings, Policy, Planning, Evaluations, Communications, Documents.

### Sources

- *Georgia School Boards Association and eBOARDsolutions — "Our Story" and Simbli product pages (gsba.com; eboardsolutions.com).*
- *CSBA — GAMUT and Policy Services pages (csba.org); California district policy portals hosted at simbli.eboardsolutions.com (e.g., Pioneer Union ESD; Eureka City Schools).*
- *Office of Governor Brian P. Kemp — "Gov. Kemp Signs Bills Strengthening Literacy and K-12 Schools," May 5, 2026 (HB 1193; HB 1009); "Gov. Kemp Signs Legislation Strengthening Georgia's Workforce," May 11, 2026 (HB 1302).*

- *Georgia General Assembly / LegiScan — HB 538 (2023), HB 307 (2025), HB 1193 (2026), HB 1302 (2026).*
- *Georgia Department of Education — “Leveraging AI in the K-12 Setting,” January 2025; appointment of an AI ethics and impact officer, January 2025.*
- *Georgia Department of Audits and Accounts — audit of AI use in Georgia classrooms, June 2026 (reported via Georgia Public Broadcasting / Georgia Recorder).*
- *Governor’s Office of Student Achievement — GA•AWARDS / Statewide Longitudinal Data System pages (gosa.georgia.gov).*
- *Institute of Education Sciences / NCES — Georgia SLDS profile, the 2009 SLDS grant, Race to the Top (2010), and the “My Georgia Insights” modernization.*
- *Education Commission of the States — overview of state AI-in-education task forces and legislation (Georgia 2024 task-force report).*

# Section 7 - California

The Substrate Decision: Two Bill Numbers, Product or Process

June 26, 2026

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California is where the decision actually gets made, and it is being made right now, in two bills moving on different clocks. The Georgia engine from the last section runs California's policy layer — the bulk of the state's roughly 1,000 districts manage their board policy on it. And in the same season that the engine hums along, California is deciding whether to keep perfecting the plane or finally build the substrate underneath it. The decision has two bill numbers.

The first is SB 1288. Signed in 2024, it directed the State Superintendent to convene a working group, publish AI guidance by January 2026, and deliver a model AI policy for districts and county offices by July 1, 2026 — five days from the date on this page. The model policy is a good-faith document: academic integrity, acceptable and unacceptable uses, data privacy, parental access to what a child enters into a system, procurement, and the effective use of AI to support rather than replace teaching. It is, in every line, the plane. It governs the product. It tells a district what its AI policy must contain, and it never once measures whether any of it reaches a child.

The second is AB 2225, and it is moving as these words are written — passed by the Assembly 78 to 1 on May 27, heard in the Senate Education Committee on June 24. It is sponsored by CSBA, the same association that licenses the Georgia engine, and it anchors a four-bill package the association calls SOS for Student Achievement. AB 2225 directs the State Board, through a competitively selected organization, to convene a working group that must deliver by 2028 a Closing the Achievement Gap State Operations and Support Plan — goals, benchmarks, annual targets, and remedies for when the state itself falls short. In CSBA's own framing, the aim is to move the state from compliance monitor to partner in improvement, and to cut the overlapping mandates that consume district administrators. Strip the legislative language away and AB 2225 is the one vehicle in California that could approve a process rather than a product.

That is the whole distinction from Section 5, now written into two bill numbers. SB 1288 approves the product — the model policy every district will keep in its binder. AB 2225 could approve the process — the measurement-and-support architecture every district feeds and from which every district draws differentiated outputs. Medicine made exactly this move when it stopped approving each molecule and began approving the manufacturing process instead. California is, for the first time, holding the door open to it.

And the stakes are the size of the budget. California will spend roughly \$138 billion on TK-12 this year — about \$25,000 per pupil, every source counted — and it cannot tell you what fraction of that reaches the specific deficit it was meant to address, because the accountability architecture aggregates to the school, not to the child. We are spending the money. We do not know which half went into the garbage. The instrument that would tell us — the oral-written

delta, the biopsy that flags the third-grader whose spoken comprehension outruns her writing before the gap compounds — is exactly what neither SB 1288 nor the current dashboards contain, and exactly what a process, approved under AB 2225, could require.

California has more English learners than any other state — close to a fifth of its students — and the end-of-average logic bites hardest there. Two of them carry the same label, 'English learner,' and need opposite instruction, because the information-flow mismatch underneath the label is opposite: one strong in spoken English and thin on the page, the other the reverse. The label is the average. The delta is the child. A model policy cannot see the difference. A measurement process can.

The window is not a metaphor here; it has dates. The model policy lands July 1. AB 2225's working group, if the bill clears the Senate, selects its organization in 2027 and delivers its plan in 2028. That selection is the control point — the moment the architecture of California measurement gets defined, either deliberately, by whoever holds the contract, or by default, by whoever moved first. And the incumbent on the existing layer, the Georgia engine, is precisely the friction-manager the competitive reset exposes. The reset does not announce itself. It simply relocates the value while everyone is busy perfecting the plane.

Which puts one institution at the center of the decision, holding both ends of it. CSBA sponsors AB 2225, the process bill. CSBA also licenses GAMUT, the Georgia product. It holds the statutory seat at the table, the distribution relationship to all 1,000 districts, and a thirty-year history of carrying compliance infrastructure to the public-sector population it serves. It is, in other words, the institution best positioned in the country to be education's Moderna — to build the process and run the children through it. Or to keep selling the product while another institution, in another state, builds the substrate first. Education does not have a Moderna yet. California is where one could be chosen.

The instrument exists. The data backbone is buildable. The bill that could approve the process is on the Senate floor; the model policy that perfects the product is due in five days. Everything the first six sections described — the federal retreat, the fifty-state road, the child's day, the third dimension, the lessons from medicine and business, the Georgia engine — converges on this single, datable decision. The plane is nearly finished. Whether California adds the third dimension now, while the ink is still wet, is the only question left on the table.

## Appendix: Acronyms & Terms

**AB 2225** California Assembly Bill 2225 (Patel) — the ‘Closing the Achievement Gap State Operations and Support Plan’; CSBA-sponsored; passed the Assembly May 27, 2026.

**AI** Artificial Intelligence.

**CCEE** California Collaborative for Educational Excellence.

**CDE** California Department of Education.

**COE** County Office of Education.

**CSBA** California School Boards Association.

**EL** English learner.

**GAMUT** CSBA’s board-governance and policy platform; runs on GSBA’s Simbli / eBOARDsolutions engine.

**LEA** Local Educational Agency (a school district or county office of education).

**oral-written delta** The gap between a student’s oral comprehension and written production — the biopsy the current accountability system does not capture.

**Prop 98** Proposition 98 (1988) — the voter-approved constitutional minimum-funding guarantee for TK-14 education.

**SB 1288** California Senate Bill 1288 (Becker, enacted 2024; Education Code §33328.5) — AI working group, guidance, and a model district policy due July 1, 2026.

**SBE** State Board of Education (California).

**SOS for Student Achievement** CSBA-sponsored 2026 legislative package: AB 2225, AB 2149, AB 2202, AB 2514.

**TK-12** Transitional Kindergarten through grade 12.

## Sources

- *California Legislative Information / LegiScan — SB 1288 (Becker, 2024; Education Code §33328.5) and AB 2225 (Patel, 2025-26 Regular Session), bill text and history.*
- *CSBA — “SOS for Student Achievement” legislative package and legislative updates (blog.csba.org); AB 2225, AB 2149, AB 2202, AB 2514.*
- *California State Senate — Senate Daily File, Senate Education Committee agenda, June 24, 2026.*
- *EdSource and CalMatters — coverage of AB 2225 and the achievement-gap working group and plan (2026).*
- *California Department of Education — 2025-26 Education Budget: total TK-12 funding of \$137.8 billion (\$25,155 per pupil); Legislative Analyst’s Office, 2025-26 Spending Plan: Proposition 98.*

# Section 8 - Collaborating with Georgia State University

Connect the First Day of School to the First Day of Work

June 26, 2026

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The first seven sections made an argument. This one answers the obvious challenge to it: can the third dimension actually be built and proven, or is it only a thesis? It can be proven — and the place to prove it is Georgia State University, because the team and the data already exist there, and have already worked together.

Inside one university sit the three capabilities an early-detection study needs. The Adult Literacy Research Center — led by Distinguished University Professor Daphne Greenberg, with Elizabeth Tighe and Iris Feinberg — supplies the reading and measurement authority. The Child & Family Policy Lab, inside the Andrew Young School of Policy Studies under economist David Ribar, supplies the cross-agency administrative-data infrastructure and the econometrics. And the Georgia Office of Adult Education, where Jackson Lilly directs research, owns the adult-learner data. They are not strangers to one another: through GPAER — a federally funded Institute of Education Sciences partnership — and a jointly authored postsecondary-outcomes report, these units have already published together. This is a collaboration to extend, not a coalition to convene.

That matters most for the one thing a new metric must survive: scrutiny. The oral-written delta is a claim about measurement, and a claim about measurement is only as good as the validation behind it. The scholar whose published specialty is the assessment of struggling readers — Tighe, the 2026 Tom Trabasso Young Investigator Award recipient — sits inside the same center. Her presence is both the asset and the test: she is exactly the co-author who can establish the metric's validity, and exactly the researcher who will decline to endorse it if it does not hold. That is the right kind of partner for a measure meant to carry weight.

The metric asks nothing new of districts, because Georgia already collects both of its inputs. The written channel is the Georgia Milestones grade-3 English-language-arts score every third-grader already takes. The oral channel is the Speaking domain of ACCESS for ELLs, the annual English-proficiency assessment every English learner already sits. The delta is the distance between them. Pulled at the de-identified, individual level through GA•AWARDS, it costs a district nothing — no new test, no new platform, no new reporting line. The signal is already in the data. No one has computed it.

The proposed study — with Dr. Greenberg as prospective principal investigator and H-EDU as partner — does exactly that, and then follows the children forward. It takes Georgia's third-grade cohorts from 2008-09 through 2012-13 and traces them across fifteen linked data elements: from the grade-3 reading profile and the oral-written gap, through the grades 4-8 trajectory, into high-school course-taking and graduation, on to postsecondary enrollment and completion, and

finally into early-career quarterly wages. It is, literally, a study that connects the first day of school to the first day of work — and asks whether a gap visible in the third grade predicts the distance a child travels by twenty-five.

Here is why the collaboration needs H-EDU and not only the university. Every line of this group's distinguished work points downstream — from adult learners forward into retention, postsecondary, and the workforce. None of it reaches back to the grade-3 origin, because that was never the question they were funded to ask. The upstream extension — beginning the arc at the third grade and the oral-written delta — is the one piece the assembled team does not already have, and it is precisely what H-EDU brings: the early-detection methodology, and the direction. The university supplies the rigor and the data machinery. H-EDU supplies the question that turns a downstream literature into a full-life arc.

And the timing is not incidental. The study rides the exact cross-agency spine — GA•AWARDS — whose governance Georgia is redrawing this year, as HB 1302 stands up a new Education Data Governance Board and renames the office that runs the warehouse. The moment a state rebuilds the governance of its longitudinal data is the moment to demonstrate what that data, read at child-level resolution, can actually reveal. A validated early-detection study is the most concrete possible answer to the question the new Board exists to ask.

So the third dimension is not speculative, and this is where that becomes provable. The instrument is computable from data Georgia already holds. The team to validate it and run the longitudinal arc already exists, already collaborates, and includes the foremost scholar of exactly the assessment question the metric raises. The only missing piece — the upstream direction — is what H-EDU brings. Collaborating with Georgia State University is how the argument of the first seven sections stops being an argument and becomes evidence.

## Appendix: Acronyms & Terms

- ACCESS for ELLs** WIDA's annual English-proficiency assessment for English learners; its Speaking domain is the oral channel for the oral-written delta.
- ALRC** Adult Literacy Research Center (GSU College of Education & Human Development): Greenberg, Tighe, Feinberg.
- Child & Family Policy Lab** Cross-agency data and econometrics unit within Georgia Policy Labs (Andrew Young School), led by David Ribar.
- GA•AWARDS** Georgia's P-20W longitudinal data system (see Section 6); the source for the study's linked, de-identified records.
- Georgia Milestones (EOG)** Georgia's End-of-Grade summative assessments; the grade-3 ELA score is the written channel for the delta.
- GOAE** Georgia Office of Adult Education (within TCSG); owns the GALIS adult-learner data; Jackson Lilly, research lead.
- GPAER** Georgia Partnership for Adult Education and Research — the IES-funded GOAE-ALRC partnership.
- GPL** Georgia Policy Labs (GSU Andrew Young School of Policy Studies), led by Tim Sass.
- IES** Institute of Education Sciences — the research arm of the U.S. Department of Education.
- oral-written delta** The gap between a student's oral comprehension and written production; the study's second research question.
- PI** Principal Investigator.

### Sources

- *Georgia State University — Adult Literacy Research Center (education.gsu.edu/research-outreach/alrc); Georgia Policy Labs and the Child & Family Policy Lab (gpl.gsu.edu).*
- *GPAER (Georgia Partnership for Adult Education and Research) — IES award and GPAER Key Findings report (Jarrard, Greenberg, Tighe, Lilly).*
- *GA•AWARDS Element Justification — draft study design (prospective PI Dr. Daphne Greenberg, GSU/ALRC; H-EDU.Solutions partner); third-grade cohorts 2008-09 through 2012-13, fifteen linked data elements.*
- *Georgia Educational Databases — source reference: GA•AWARDS, ACCESS for ELLs (WIDA), Georgia Milestones, GALIS (compiled for H-EDU.Solutions, June 2026).*

# Section 9 - The Proof

h-edu.solutions: VERA and COMPLY, Already Live in All Fifty States

June 27, 2026

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Everything to this point has been an argument about something that does not yet exist in the classroom — the instrument, the third dimension, the verification layer that reaches the individual child. This section closes that loop, because the argument is no longer hypothetical. The instrument is built. It is deployed. It is live, right now, at h-edu.solutions — and not in a single pilot district, but in all fifty states.

The premise on the homepage is the premise of this entire document, in one line: every education system measures test scores; none of them verifies whether interventions actually reach individual students — and H-EDU builds the infrastructure that closes that gap. It calls the result reciprocal accountability — accountability that flows in both directions, confirming that policy reaches students and that student outcomes inform policy. That is the third dimension, named and shipped.

The proof is the map. VERA — the Verification Engine for Results and Accountability — is live in all fifty states and the District of Columbia, and each deployment computes the same thing this document has called the biopsy: the oral-written delta, the Type 4 gap, the child who speaks well above what she can put on the page. It does it against each state's own instrument — ACCESS for ELLs in most, but AZELLA in Arizona, TELPAS in Texas, NYSESLAT in New York, KELPA in Kansas, ELPT in Louisiana, and the ELPA21 battery across a dozen more — each tuned to that state's English learners, its assessments, and its laws. Fifty different measurement regimes, one metric, computed everywhere.

And it does not stop at the border. The same engine runs in New South Wales against NAPLAN, in New Zealand against the NCEA framework, in Ontario against STEP, in the Netherlands against NT2, and in Tokyo against the DLA — fifty-five jurisdictions across six countries, federated into a single cross-jurisdiction comparison engine. The oral-written delta was never a California idea, or even an American one. It is a measurement that travels, and the site demonstrates it traveling.

Underneath the map is the machine the earlier sections only described. VERA connects an AI model to state education data through the Model Context Protocol, which turns assessment databases, LCAP filings, and intervention records into something a superintendent can query in plain English. It performs real-time Type 4 detection; LCAP match-rate verification — confirming whether funded interventions actually reached the students they were meant to serve; cross-district pattern analysis; student-level intervention tracking; and a non-evaluative teacher observation layer. That last item is the teacher's daily review from the Conclusion, already part of the build.

The policy side of the plane is shipped too. VERA Comply is the SB 1288 compliance product, live for California districts as a six-module workflow that turns a district's existing policies and the state's AI requirements into board-ready governance documents — exactly the reconciliation the Conclusion describes, running today. The product side and the data side are not two promises. They are two portals.

There are four ways in, and they are open: a research portal for querying the assessment data and the deltas; a district-intelligence portal built for administrators and board members to examine their own English-learner gap and LCAP alignment; the federation engine that compares deltas and Type 4 rates across all fifty-five jurisdictions; and VERA Comply. A skeptic does not have to take the argument on faith. The skeptic can open the portal.

So the honest status of this work is not “proposed.” It is built, deployed, and waiting. The homepage says it more plainly than any section could: the infrastructure exists; the question is will. Fifty states of evidence sit behind that sentence. What remains is not invention — it is the decision, by the institutions that hold the seats and the distribution, to use what already works. Which is exactly where the Conclusion picks up.

## Appendix: Live Deployments & Platform

**Jurisdictions (55, in 6 countries).** United States (50 states + DC): Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota (H-EDU home base), Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming. International: New South Wales (Australia), New Zealand, Ontario (Canada), the Netherlands, and Tokyo (Japan).

**Assessment instruments (oral channel vs. writing).** ACCESS for ELLs (WIDA, most states), AZELLA (AZ), TELPAS (TX), NYSESLAT (NY), KELPA (KS), ELPT (LA), and the ELPA21 battery (multiple states); internationally, NAPLAN (NSW), the NCEA framework (NZ), STEP (Ontario), NT2 (Netherlands), and the DLA / ESAT-J (Tokyo).

**VERA platform capabilities.** Connects an AI model to state education data via the Model Context Protocol (MCP) for plain-English query; real-time Type 4 (oral-written delta) detection; LCAP match-rate verification; SB 1288 compliance infrastructure; cross-district pattern analysis; student-level intervention tracking; and a non-evaluative teacher observation system.

**Portals (open).** VERA Research ([jeremy.h-edu.solutions](http://jeremy.h-edu.solutions)); VERA District Intelligence ([district.h-edu.solutions](http://district.h-edu.solutions)); VERA Federation cross-jurisdiction engine; and VERA Comply, the SB 1288 six-module compliance workflow ([h-edu.solutions/pages/comply.html](http://h-edu.solutions/pages/comply.html)).

### Source

- *h-edu.solutions* — “Global Education Accountability Infrastructure” (a *Hallucinations.cloud* initiative); homepage, jurisdiction directory, and VERA / VERA Comply portal pages, accessed June 27, 2026.

# Conclusion

No Nonsense: Both Sides of the Plane, and the Dimension Beyond It

June 26, 2026

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This is no nonsense. Strip away the analogies and the legislative detail, and the whole document reduces to one buildable claim: H-EDU can do both sides of the plane the rest of the field is still drawing — and then add the dimension no one else has built.

On one side, policy. Put every policy of every school district in a state on a table, and put all the requirements of AI on the other side of it — the model policy, the statute, the guidance, the mandates. Reconcile the two, district by district, and deliver back an AI-compliant set of new policies, written to the law and to the moment. That is not a pilot or a promise; it is a reconciliation a disciplined system can perform at scale, and it is exactly the work the governance-compliance incumbents already do — extended, for the first time, to AI. The product side, done right.

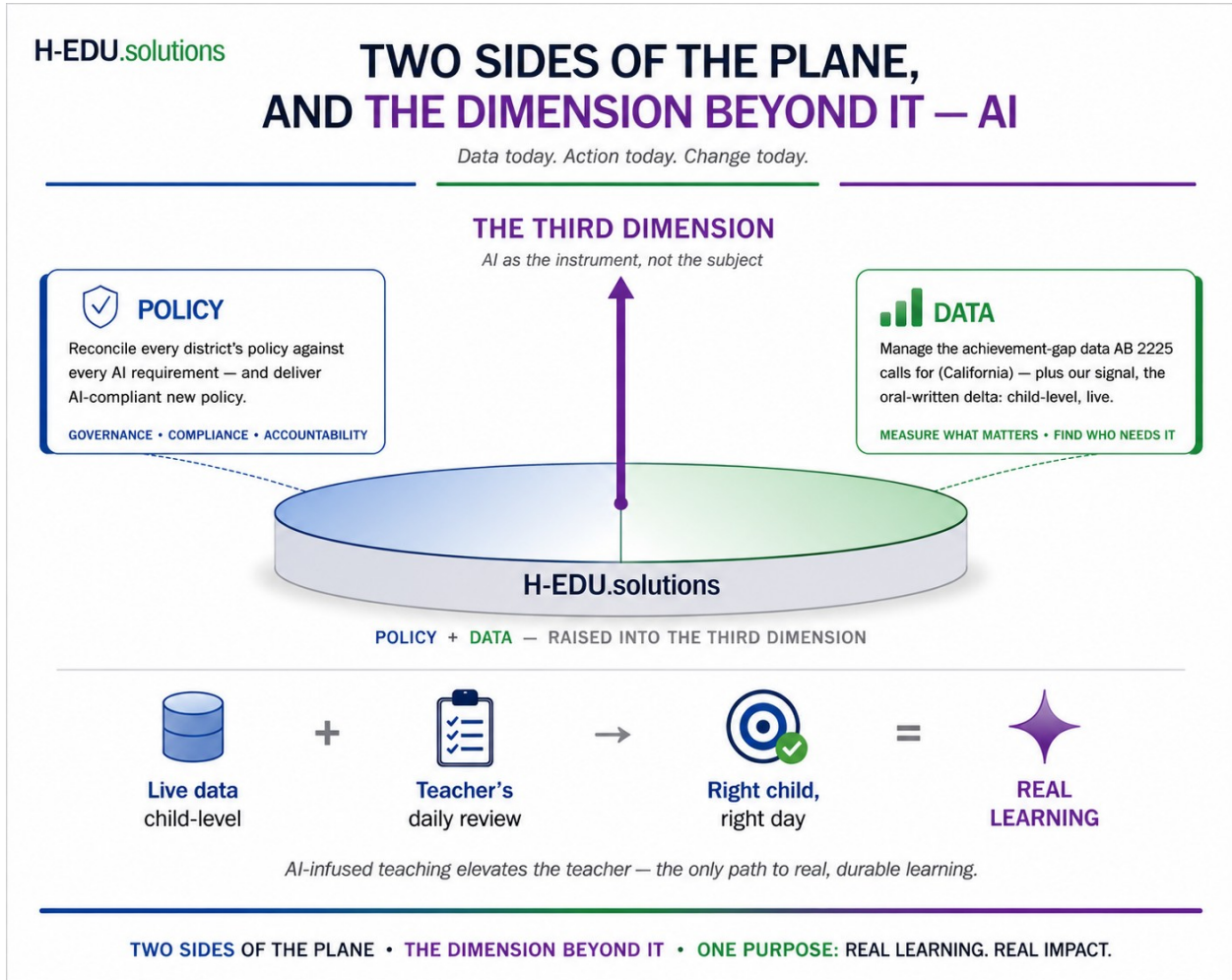
On the other side, data. In California, H-EDU can manage the data the AB 2225 process calls for — the measurement substrate behind the achievement-gap plan — and bring to it something that plan does not yet have: our delta, the oral-written gap that finds the specific child the annual test renders invisible. That is the floor. The point is to go beyond it.

Beyond it is the whole purpose. Make the data available — not locked in a research warehouse or flattened into a once-a-year dashboard, but live, at child-level resolution — and supplement it with the one signal no administrative system captures: the teacher's daily review, the judgment of the human adult in the room. Put those together and you have the instrument panel behind AI-infused teaching — the teacher elevated, not replaced; the intervention aimed at the child who needs it, on the day she needs it. And AI-infused teaching is the only thing that produces the learning — the real, invisible, durable learning — that the work demands and the society advances of tomorrow will require.

Everything in these pages stands behind that claim. The federal government has handed the question to the states. The states are all on the same road, adopting AI plans because preparing children for an AI-shaped world is not optional. The third dimension — AI as the instrument, not the subject — is the only axis that reaches actual learning. Medicine and business already proved that the winners approve the process, not the product, and move before the window closes. Georgia built the policy machine and the data backbone and still never made the instrument. California is deciding, in two live bills, whether to keep perfecting the product or finally build the process. And Georgia State already holds the team and the data to prove the instrument works. Two sides of a plane, and the dimension beyond it. That is the architecture, and H-EDU is built to deliver all three.

None of it waits on permission. The legislation is signed or moving. The data exists. The research team is assembled. The instrument is computable today. The only open question is

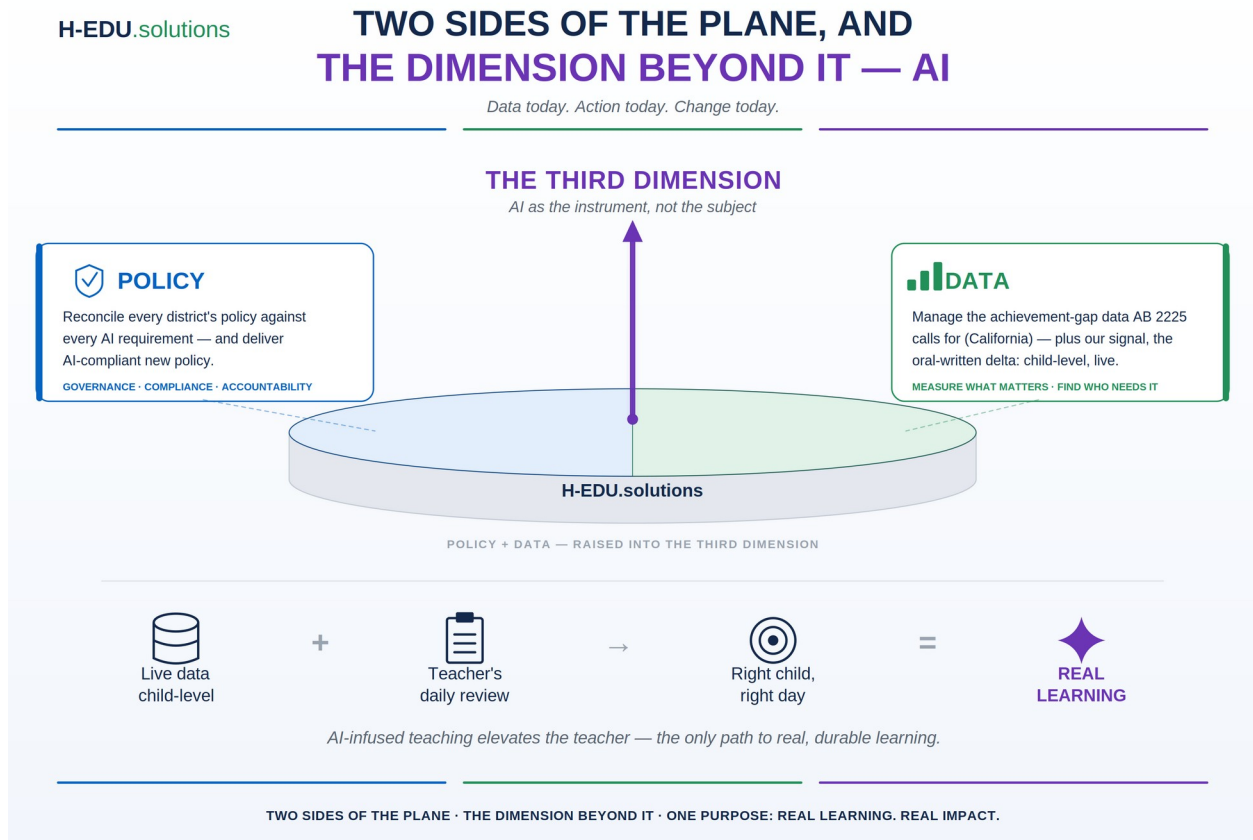
whether the institutions that hold the seats and the distribution will build the process now, while the ink is still wet — or inherit it later from whoever did. H-EDU’s answer is the one it has always given: don’t lament — engage.



*The architecture in one frame: two sides of the plane, and the dimension beyond it.*

# Appendix A — Two Sides of the Plane

The Dimension Beyond It — AI



*The architecture in one frame: two sides of the plane — policy and data — raised into the third dimension, where AI becomes the instrument that reaches real learning.*

# H-EDU Engagement Timeline — The AB 2225 Working Group

The Runway to the Presentation: Positioning, Selection, and the Plan  
 June 27, 2026

This is the runway from today to H-EDU's presentation to the AB 2225 working group — and, on the strongest path, to convening it. It is anchored to the bill's own procedural gates. One caution governs every date below: AB 2225 is not yet law, and its internal deadlines have already been amended once. Treat the target dates as the bill's current targets, subject to further amendment, and re-peg this timeline the day the Governor signs.

Where the bill stands today (June 27, 2026): passed the Assembly 78-1 on May 27; passed the Senate Education Committee 7-0 and re-referred to Senate Appropriations on June 24. It sits on the Appropriations suspense file now. Nothing downstream — the organization, the working group, the Plan — begins until it clears the Legislature and is signed.

Window	Gate / Milestone	H-EDU Objective & Actions
<b>Phase 0 — Enactment Watch</b> Now — Sept/Oct 2026	AB 2225 clears Senate Appropriations, the Senate Floor, and Assembly concurrence; reaches the Governor by the Legislature's Aug 31 deadline; is signed by the Governor's end-of-September deadline. Effective Jan 1, 2027.	Build the relationships before the criteria are written: CSBA (the bill's sponsor), and State Board (SBE) and CDE staff (the selectors). Stand up the GSU partnership and the 50-state proof of concept as credibility. Objective: be known and credible to the people who will design the competitive process.
<b>Phase 1 — Solicitation Design</b> Late 2026 — early 2027	Post-signing, the SBE — in consultation with CDE — designs the competitive process to select the organization(s) with experience assessing governance structures and closing achievement gaps.	Shape and meet the criteria: the GASB/CSBA distribution history (governance-structure experience), the oral-written delta (achievement-gap measurement), the GSU validation partnership (research rigor), the 50-state platform (scale). Prepare the bid. Objective: a bid-ready proposal aligned to criteria H-EDU uniquely satisfies.
<b>Phase 2 — Competitive Selection</b> by March 1, 2027 (target)	The SBE selects and contracts the organization(s) that will convene and lead the working group.	Submit the bid; lead with the differentiators — the delta, the public-data method, the GSU validation arm, the 50-state platform. Objective: be selected as the organization — or be the named research and data partner of whoever is.
<b>Phase 3 — Convene &amp; Present</b> by Sept 1, 2027 (target)	The selected organization convenes the stakeholder working group (CSBA, administrators, labor, and SBE / Superintendent / legislative designees).	THE PRESENTATION TO THE WORKING GROUP. Present the measurement architecture as the spine of the Plan: the delta, child-level data, the teacher's daily-review layer, and the longitudinal arc from grade 3 to the first day of work. Objective: the working group adopts H-EDU's framework as the Plan's backbone.
<b>Phase 4 — Develop the Plan</b> Sept 2027 — March	The working group develops the Closing the Achievement Gap State Operations and Support	Embed the delta, the data solution, and the teacher-review layer into the Plan's goals, benchmarks, and metrics. Objective: the Plan

2028	Plan — goals, benchmarks, annual targets, and evaluations of state bodies.	specifies H-EDU's substrate as the state's measurement layer.
<b>Phase 5 — Submit &amp; Fund</b> by March 1, 2028 — from Sept 2028	The Plan is submitted to the Governor and Legislature; annual joint budget hearings begin (~Sept 1, 2028), with LAO alignment reports (AB 2149), a public dashboard (AB 2514), and the SBE Commission (AB 2202).	Move to delivery: the 50-state platform as the implementation vehicle. Objective: funded, statewide implementation of the measurement layer.

**The critical path runs through Phase 2.**

Everything before the selection is positioning to win it; everything after depends on having won it. The presentation in Phase 3 is strongest when H-EDU enters the room as the selected organization that convened the group — not as an outside vendor invited to comment. The single highest-leverage stretch on this runway is therefore the months before March 2027, when the criteria are written and the bid is judged — which is why the relationship and credibility work in Phases 0 and 1 is not preamble. It is the work.

*Dates reflect AB 2225 as it reads on June 27, 2026 (passed Assembly; in Senate Appropriations). They are the bill's current targets and will shift with further amendment; confirm against the enrolled bill at signing. Sources: LegiScan and California Legislative Information (AB 2225 text and history); CSBA legislative updates (SOS for Student Achievement package: AB 2225, AB 2149, AB 2202, AB 2514); California State Senate file and deadlines calendar.*