



June 2, 2026

Scott Schmerelson, Board President
And Members of the Board of Education
Los Angeles Unified School District
333 South Beaudry Avenue
Los Angeles, CA 90017

Dear President Schmerelson and Members of the Board:

On behalf of SIIA, we thank the District for its thoughtful work on *Using Technology with Intention*. We share its core goal: safeguarding student wellbeing and ensuring purposeful technology use. We support this intent and offer refinements to make the policy more precise and equitable.

By way of background, SIIA is the principal trade association for the software and digital information industries worldwide. Our nearly 400 member companies and associations represent the diverse landscape of digital content providers. These providers span academic publishing, education technology, financial information, and data analytics. We serve as the leading voice for the ed tech industry. Our members partner with K-12 schools and institutions of higher education to develop and deliver software applications, digital instructional content, online learning services, assessments, and related technologies. These tools serve millions of learners nationwide.

The principle at the heart of a sound policy is straightforward: this is not a rejection of technology, but an evolution in how we think about it. Not all screen time is the same: purposeful, instructional technology overseen by educators is fundamentally different from passive or disconnected use. The strongest policies recognize this distinction, rather than treating all device use equally. We also recognize the irreplaceable value of the teacher-student relationship and believe technology should strengthen—not replace—it.

The most important distinction the final policy can draw is between passive screen time and educator-guided learning time. A blanket daily minute limit treats an adaptive reading diagnostic, an assistive technology tool, and an unstructured consumer app as if they were the same. Purpose-built educational technology is already governed by multiple federal laws. These include FERPA, COPPA, ESSA, IDEA, the ADA, and CIPA. These laws do not apply to general consumer platforms. We encourage the District to keep its restrictions targeted at consumer platforms, such as social media, streaming, and gaming, which the draft rightly blocks. At the same time, district-approved, curriculum-aligned instructional tools should not be limited by the same caps. We also believe early learners require a different approach. It should be anchored in direct interaction and explicit instruction, with digital tools used in focused, purposeful ways that complement, rather than replace, teacher-led learning.

We are especially mindful of the students who depend on these tools most. We are encouraged that the current draft already carves out exceptions for assessments and for students with IEPs

or 504 plans. We urge the Board to preserve and reinforce those protections in the final policy. That way, legally required tools are never at risk under IDEA and the ADA.

At the same time, we do not believe those exceptions are sufficient on their own. Tools that enable all students to actively participate benefits all students. For example, an interactive visualization of a complex topic may unlock learning for more students than just those with legally required access to such tools. Providing access to these tools can foster a learning environment that minimizes barriers and maximizes learning for all students. Put differently, what is helpful for 17% of students with IEPs or 504 plans can also benefit the other 83%. A policy built only around exception risks treats accessibility as a side door, but the evidence suggests it should shape the main entrance. This is especially true in under-resourced schools. In these schools, district-approved technology is often the primary source of high-quality, individualized instruction. Blunt early grade restrictions can widen the very gaps the District works to close.

Finally, we encourage LAUSD to lead with the lever it already has rigorous evidence standards and instructional approval before procurement. These are consistent with federal ESSA requirements. Strong partners should welcome accountability. Districts should evaluate all vendors against results. If the concern is unproven technology in classrooms, the answer is a higher evidence bar for what gets approved. Time limits should not apply to tools that have already met those standards.

We share the District's concern. We want to help LAUSD get this right. Instead of focusing solely on-screen time, the right questions are what tools students use, who governs them, and what the evidence shows. We welcome the chance to partner during the feedback period and beyond.

Sincerely,

Sara Kloek
Vice President, Education and Youth Policy
Software & Information Industry Association (SIIA)

