CoachRoom and California SB 848

How CoachRoom supports district compliance with the Safe Learning Environments Act

Prepared by Win Elements LLC · September 2026 (rev. 2) · For review by district counsel, risk management, and technology leadership

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1. Purpose and scope of this document

Senate Bill 848 (Pérez), the Safe Learning Environments Act, was signed October 7, 2025 and took effect January 1, 2026, with several obligations phasing in on July 1, 2026. It regulates school districts, county offices of education, charter schools, private schools, and state special schools. **It does not regulate software vendors.** CoachRoom cannot be "SB 848 compliant" in the way a district can; what it can do is make a district's compliance easier, and avoid creating the conditions the law is designed to prevent.

This document (a) summarizes the parts of SB 848 that touch electronic communication between adults and students, (b) maps each to a specific CoachRoom design decision, (c) states plainly what CoachRoom does not do, and (d) offers model language a district may adapt when it references CoachRoom in its Education Code §32100 policy.

This is an alignment statement prepared by the vendor. It is not legal advice, and a district's counsel should confirm how it applies to that district's policies.

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2. What SB 848 requires (the parts that matter here)

SB 848 is a broad bill. Most of it concerns hiring, misconduct disclosure between employers, mandated-reporter training, and school safety plans. Four provisions bear on how adults communicate with students through technology:

2.1 Education Code §32100 — written policy on professional boundaries (due July 1, 2026). Each governing board must adopt a written policy to promote safe environments for pupil learning and engagement. The policy must address professional boundaries between employees and pupils and must establish appropriate limits on contact, during or outside the school day, between pupils and employees via social media internet platforms, text messaging, and other forms of communication that do not otherwise include the pupil's parent or guardian.

2.2 Comprehensive school safety plans (Ed. Code §32280 et seq.). Public districts and county offices must add procedures specifically designed to address supervision and protection of children from child abuse or neglect and sex offenses, at the next plan review or by July 1, 2026.

2.3 Mandated reporter expansion (Pen. Code §11165.7; Ed. Code §44691; July 1, 2026). Annual training extends to volunteers and board members, and volunteers who interact with pupils outside the immediate supervision of a parent, guardian, or school employee are treated as mandated reporters.

2.4 Criminal communications with a minor (Pen. Code §288.3). SB 848 adds §288.3 (contacting a minor with intent to commit a felony) to the offenses that bar employment in schools, reflecting the Legislature's focus on private adult-to-minor contact as a grooming pathway.

The common thread: **private, unsupervised, one-to-one electronic contact between an adult and a student is the risk the Legislature is targeting.** Tools that make such contact easy, invisible, or unlogged make district compliance harder. Tools that make it structurally impossible make compliance easier.

3. CoachRoom's design, mapped to SB 848

SB 848 concern	CoachRoom design decision	Effect
Private adult-to-student messaging via apps or texting (§32100)	Students have no accounts and cannot send messages. There is no direct-message feature, no student chat, no reply function on anything students see.	Adult-to-student private electronic contact is not possible on the platform.
Contact that "does not otherwise include the pupil's parent or guardian" (§32100)	The team board is one-way and readable by parents. A coach's updates are posted to a page reachable by link or code; parents read the same page students do, at the same time.	Every coach communication to students is, by construction, visible to parents.
Professional boundaries in electronic communication (§32100)	Adult-to-adult chat only, and only between verified or attested adults. Match chat is between the coaches of two teams and the organizer; the lobby is the roster of adult coaches. A person can post in either only if their account was approved by a CoachRoom administrator or an approved organizer attested, when adding them, that the address belongs to school staff. The attestation (who, when) is stored with the roster entry. Anyone rostered without it can read but not post.	Two-way communication on the platform occurs only between adults who are either verified by an administrator or attested as school staff by a verified organizer, with a record of who attested.
Supervision and oversight (§32280)	Organizer visibility and an audit trail. Every message is stored with author, time, and recipient scope; organizers see all chat in their tournament; administrators see all activity platform-wide; nothing can be edited or deleted by the author to hide it.	A district can review what was said, by whom, to whom, after the fact.
Inappropriate language or content (§32100, §32280)	Automated word filtering with a moderation log. Every message and board post passes a configurable language filter before it is stored; originals are logged for organizers and administrators only.	Prohibited language is masked for everyone and preserved for review.

SB 848 concern	CoachRoom design decision	Effect
Verifying that adults on the platform are school staff (§32100, hiring provisions)	Approval gate, two-step verification, and organizer attestation. Only coaches whose school, name, and phone have been reviewed and approved by an administrator can create events or team boards; approved coaches and administrators use an authenticator app as a second factor. Coaches added to a roster by an organizer are covered by that organizer's recorded attestation (above).	Creation rights are limited to verified school staff; every rostered adult is traceable to a verifier.
Students appearing on the platform under a school email (§32100)	Student email addresses are refused at every entry point. An administrator-managed list of student address patterns (student subdomains such as `students.district.org`, and district-specific rules such as "numeric ID before the @ at a shared domain") is enforced in the database on sign-in, rosters, team coach fields, and registrations. A blocked address cannot create an account or be added by anyone, including an organizer who types it by mistake.	The most common way a student ends up in a staff tool — a school email typed onto a roster — is blocked before it happens.
Oversight of who is on rosters (§32280)	Roster audit. Administrators have a standing report of every rostered email that is not an approved account, showing the tournament, whether the person has ever signed in, and which organizer attested for them.	A district can answer "who vouched for this person" from one screen.
Collection of student information	Nothing is collected from students or families. No student accounts, no student names required anywhere, no cookies beyond a device-side preference, no analytics. Contest entries use pseudonyms. Team rosters are team names, not player lists.	No student data means no student-data breach vector and no FERPA/COPPA processing by the vendor.
Records and retention	Defined retention, exportable records. Chat is retained 12 months after an event and then deleted; moderation logs 24 months; organizers can export at any time; districts can request deletion.	Records exist long enough for an investigation and are not kept indefinitely.
Public-facing pages	Public pages show event information only. Brackets, scores, times, team names, and board posts; never chat,	Nothing a student or parent sees exposes private communication.

SB 848 concern	CoachRoom design decision	Effect
	coach contact details, or student names. Sharing is off by default and controlled by the organizer.	

4. What CoachRoom does not do

A district reviewing CoachRoom under SB 848 should be clear about the limits.

- **CoachRoom does not verify employment or background.** The approval gate confirms a person presents as school staff (school, name, phone, school email), and organizer attestation records a colleague's confirmation; neither runs a background check or confirms district employment. Districts remain responsible for who they authorize to use it.
- **Student-address blocking depends on the district's addressing scheme.** Where students and staff share a domain with no distinguishing pattern, the block cannot apply and the organizer's attestation and the administrator's review are the controls. Districts should tell Win Elements their student-address pattern so it can be added.
- **CoachRoom does not replace the district's §32100 policy.** It is a tool that can be referenced by that policy; the policy itself, the training, and the enforcement are the district's.
- **CoachRoom does not train mandated reporters or track training.** Nothing on the platform satisfies §44691.
- **CoachRoom cannot prevent contact that happens elsewhere.** A coach who texts a student personally is outside the platform; CoachRoom's contribution is that it never becomes the venue.
- **The word filter matches words, not intent.** It is a safeguard, not a substitute for adult oversight.
- **Public pages are public.** A team board's access code is a convenience for keeping a page out of casual view, not a security control. Organizers are told this in the interface and should post only what they would print on a flyer.

5. Recommended controls for a district adopting CoachRoom

These are configuration and policy choices, most of them available today in the platform's administrator panel.

1. **Designate an administrator.** Approve coach accounts only for staff the district recognizes. Revoke on separation.
2. **Require two-step verification for approved coaches** (the default). Do not relax it to "administrators only" unless there is a specific reason.
3. **Populate the banned-words list** with the district's own prohibited terms.

3a. **Tell Win Elements your student email pattern** (for example, a student subdomain, or "numeric ID before the @") so it is added to the blocked-address list for your district.

3b. **Review the roster audit** on a schedule, or delegate it to the event organizer.

1. **Set retention** to match the district's records schedule (defaults: 30 days to archive, 12 months for chat, 24 months for moderation logs).
2. **Instruct coaches** that team boards are one-way and public-facing; that student names, grades, health information, and discipline never go on a board or in a team name; and that all chat is visible to organizers and administrators.
3. **Reference CoachRoom in the §32100 policy** as an approved, one-way, parent-visible channel for team logistics, and list personal texting and private social media messaging as the prohibited alternatives it replaces.
4. **Review the moderation log** on a schedule, or delegate that to the event organizer as part of their duties.

6. Model policy language (for district adaptation)

> *Electronic communication with pupils for athletics, esports, and co-curricular activities.* Employees and authorized volunteers shall not communicate with pupils through personal text messaging, personal social media accounts, or any private messaging service. Team logistics and announcements shall be communicated only through district-approved channels that are visible to parents and guardians, including [ParentSquare / district email] and the CoachRoom team board, a one-way posting tool on which pupils have no accounts and cannot reply. Communication among coaches and event staff during competitions may occur through CoachRoom, which retains records of all such communication for district review.

Districts should have counsel adapt the wording to their existing board policy format (e.g., CSBA BP 4119.21 / 4219.21 / 4319.21 series on professional standards, and BP 5131 on conduct).

7. Security and privacy summary (for IT review)

- Hosting: static site on Cloudflare; database, authentication, and realtime services on Supabase (United States); transactional email via Postmark from winelements.com.
- Authentication: passwordless email link for all users; authenticator-app second factor for administrators and approved coaches.
- Authorization: row-level security enforced in the database on every request; match chat readable only by the two teams' coaches and the organizer; administrators see all.
- Data: encrypted in transit and at rest; automated backups; no student data collected; no advertising; no data sales; no third-party analytics.
- Content: automated language filtering; immutable message records; moderation log visible to organizers and administrators.
- Roster integrity: administrator-managed blocklist of student email patterns enforced in the database at sign-in, rosters, team fields, and registrations; organizer attestation recorded on every roster entry; posting in chat limited to approved or attested adults; roster audit report for administrators.
- Policies: Terms of Service, Privacy Policy, and Copyright Policy published at coachroom.winelements.com. Win Elements carries technology and cyber liability coverage.

8. Summary

SB 848 asks districts to put limits on private adult-to-student electronic contact and to keep the environment supervised. CoachRoom was built on the same premise before the bill was signed: students never have accounts, student email addresses are refused at every entry point, every adult-to-student message is one-way and parent-visible, every adult-to-adult message is logged and reviewable and can only be sent by an adult who was verified by an administrator or attested by a verified organizer, and nothing is collected from children. It cannot make a district compliant on its own, but it removes one of the most common ways compliance fails: the app that quietly becomes a private line to a student.

Win Elements will provide this document, the security summary, and the published policies to any district reviewing CoachRoom, and will answer counsel's questions directly at hello@winelements.com.

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References: SB 848 (Pérez), Chapter 460, Statutes of 2025; Ed. Code §§32100, 32280–32282, 44010, 44051, 44052, 44691, 44939.5, 51950; Pen. Code §§288.3, 11165.7. Summaries of the bill's provisions were drawn from the enrolled bill text and analyses published by California education-law firms (AALRR, Lozano Smith, Liebert Cassidy Whitmore) in late 2025 and early 2026.