

1 Cyrus Mehri (pro hac vice)
2 cmehri@findjustice.com
3 Mehri & Skalet, PLLC
4 2000 K Street NW, Suite 325
Washington, DC 20006
Telephone: (202) 822-5100

5 *Plaintiff School Districts' Steering Committee Member*

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 IN RE: MCKINSEY & CO., INC.
10 NATIONAL PRESCRIPTION OPIATE
11 CONSULTANT LITIGATION

12 This Document Relates to:

13 ALL SCHOOL DISTRICT ACTIONS

Case No. 21-md-02996-CRB (SK)

**THIRD STATUS REPORT BY SCHOOL
DISTRICTS, UPDATING COURT
REGARDING THE PUBLIC SCHOOL
DISTRICTS' OPIOID RECOVERY TRUST**

Courtroom: 6, 17th Floor

Judge: The Honorable Charles R. Breyer

16 The Public School Districts' Opioid Recovery Trust (PSDORT) submits this status report to
17 update the Court on progress made by Special Trustee Dr. Andrés Alonso and the Administrative
18 Trustee, Truist Bank, in distributing settlement funds through PSDORT grants.
19

20 **Grant Award Announcement**

21 On June 15, 2025—following a comprehensive review process that included recruiting a
22 distinguished group of national experts to evaluate grant submissions, consulting with a Committee
23 of District Representatives, and reviewing the more than 200 grant proposals received—Special
24 Trustee Dr. Alonso notified **39** lead district applicants from **20** states and American Samoa that they
25 had been selected to receive a total of **51** grant awards. Each award, of up to \$500,000, will be
26 disbursed over three years.
27
28

1 Because several districts selected for awards submitted joint proposals in partnership with
2 other districts, the total number of participation districts that will benefit from the awarded funds is
3 64.

4
5 This status report summarizes the volume and nature of the applications received, how they
6 were evaluated and selected for awards, and the characteristics of the proposals selected for awards.

7 **Application Review and Volume**

8
9 The figures reported in our last status update (ECF 774) reflected information as entered by
10 applicants in the submission portal. Upon closer review, however, Dr. Alonso and his teams of grant
11 reviewers discovered that some districts had uploaded multiple, distinct proposals under a single
12 submission. After separating these, the final count of applications received comes to 205 distinct
13 proposals for funding from **147** lead districts and **47** partner districts, spanning **34** states and
14 American Samoa. Notably, eight states—New York, Maine, Massachusetts, Florida, Kentucky,
15 New Hampshire, New Jersey, and Illinois—generated more than 10 applications each. Appendix A
16 (PSDORT Applications and Participation by State) shows the pre-award application and
17 participation data of applicant school districts by state. Reconciling the portal took unanticipated
18 time. The reviewers also required more time to complete their task because of the greater volume of
19 proposals. As a result, Dr. Alonso pushed back the notification of the awards to the districts until
20 June.

21 **Applications Categories**

22
23
24 Applicants were invited to submit proposals in one of three categories: *District Improvement*
25 (*DI*), *Model Programs and Best Practices (MP)*, and *Innovative Programs (INV)*. The distribution
26
27
28

of applications by category is reflected below:

Application Type	Number of Applications
District Improvement	85
Model Programs and Best Practices	70
Innovative Programs	50
Total	205

Applicant Demographics

The set of grant proposals received confirms that the PSDORT's outreach strategies—including sustained engagement with intermediaries, follow-up communications, and the intentional RFP design—were successful in reaching the small, rural, and under-resourced districts most affected by the opioid crisis.

By Enrollment

Lead District Student Enrollment	Number of Applications
100k plus	8
50k-100k	5
25k-50k	8
10k-25k	24
5k-10k	25
1k-5k	96
500-1k	20
0-500	19
Total	205

By Free and Reduced Lunch Eligibility (FRL)

FRL % (Lead District)	Number of Applications
>90	38
>80	11
>70	26
>60	36
>50	38
>40	26
>30	9
>20	13
<20	8
Total	205

By % of Students With Disabilities (SWD)

SWD % (Lead District)	Number of Applications
>50	2
>40	7
>30	15
>20	79
>15	68
>10	25
<10	9
Total	205

The review team is extremely pleased to see widespread participation from districts serving students with high needs.

How Grant Submissions Were Evaluated & Scored

Each grant application was assigned to two neutral reviewers drawn from a panel of 30 distinguished national leaders, including current and former school district and state superintendents, school board members, leaders in special education and family engagement, public health officials, foundation executives, researchers, and policy experts. See Appendix B (PSDORT Reviewers).

Dr. Alonso also personally briefed each reviewer to ensure their familiarity with PSDORT's goals and to explain the evaluation rubric, which assessed proposals across five dimensions: (1) program design and implementation, (2) alignment with PSDORT's goals, (3) organizational capacity, (4) measurable objectives, and (5) budget. See Appendix C (PSDORT Grant Evaluation Rubric) and Appendix D (PSDORT Grant Evaluation Priority Considerations).

To supplement district-provided materials, the review team consulted two external datasets to assign objective opioid "impact" scores:

1. **ARCOS data (2006-2021):** county-level data on the number of opioids dispensed in the county, compiled by the DEA (and measured in morphine milligram equivalents, or MME).
2. **Neonatal Abstinence Syndrome (NAS) birth data (2008-2022):** statewide NAS birth rates per 1,000 births, compiled by the Agency for Healthcare Research and Quality.

Using these datasets, the review team placed applicants into one of five tiers based on their respective MME and NAS rates, which were then averaged into a combined "impact" score (ranging from 1 to 5, with 1 indicating the lowest and 5 indicating the most severe impact).

While acknowledging that the ARCOS and NAS data might not precisely reflect conditions

1 in every applicant district, Dr. Alonso and the team concluded that these data provided useful
2 information for evaluating the comparative severity of the opioid crisis in each applicant district—
3 and usefully supplemented districts’ self-reported information.

4 5 **Award Decisions**

6 Nearly half of all proposals received a combined score of 80 or higher from their two neutral
7 readers, evidencing the seriousness with which most applicants approached their RPF submissions.

8
9 Given funding constraints and the need to provide meaningful award amounts, **51** proposals
10 were selected for funding—representing **39** lead districts and **25** partner districts across **20** states
11 and American Samoa. See Appendix E (PSDORT Award List) and Appendix F (PSDORT Awards
12 by State). Of the 51 proposals selected for awards:

- 13 • **47** proposals had combined impact scores of either 5 or 4.
- 14 • **2** proposals lacked NAS data but had MME scores of 5.
- 15 • **1** high-scoring Model Program and Best Practices proposal had no impact score, but the
16 reviewers found its case persuasive and did not want to penalize the applicant for data
17 limitations beyond its control.
- 18 • **1** proposal had a combined impact score below 4 but represented a collaboration of 11 partner
19 districts with high potential.
- 20 • **1** proposal, although not among the highest scorers overall, was selected because it brought
21 together 9 partner districts for a particularly promising venture.
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Awards by Impact Score

Award Applications Combined Impact Score	Number of Awards Made
5	27
4	20
3	1
2	0
1	0
Partial Score 5	2
No Score	1
Total	51

Awards by Grant Type

Grant Type	Number of Awards Made
District Improvement	24
Model Programs and Best Practices	16
Innovative Programs	11
Total	51

Award by Lead District Enrollment

Enrollment Range	Number of Awards Made
100k plus	1
50k-100k	2
25k-50k	2
10k-25k	12
5k-10k	2
1k-5k	26
500-1k	1
0-500	5
Total	51

Awards by Free and Reduced Lunch (FRL) Rate

FRL % Range	Number of Awards Made
>90	9
80-90	1
70-80	6
60-70	11
50-60	8
40-50	7
30-40	6
20-30	3
<20	0
Total	51

Awards by Students With Disabilities (SWD) Rate

SWD % Range	Number of Awards
>50	0
40-50	3
30-40	3
20-30	21
15-20	21
10 to 15	2
<10	1
Total	51

Appendix G (PSDORT Award Proposal Summaries) provides brief summaries of each winning proposal, along with selected comments from the reviewers. As reflected there, across the board, reviewers deemed proposals the strongest when they gave a clear definition of the problem(s) the grant will solve, a strategy closely aligned with that definition, a feasible implementation plan, realistic scopes, and specific attention to personnel and roles—particularly in under-resourced contexts.

Next Steps

Dr. Alonso is in the process of collecting signed agreements from all lead districts selected for awards. See Appendix H (PSDORT Final Agreement). Under the agreement, each district must: submit quarterly financial reports and semiannual programmatic reports; participate in follow-up calls with Dr. Alonso, to ensure both support and accountability; and join virtual convenings twice a year to share experiences and learn from peers.

Dr. Alonso looks forward to updating the Court on insights that emerge from the PSDORT's efforts, the new opportunities made possible for school communities because of PSDORT grants, and the challenges that will, inevitably, continue to require attention.

Dated: August 7, 2025

Respectfully submitted,

Cyrus Mehri (pro hac vice)
cmehri@findjustice.com
Mehri & Skalet, PLLC
2000 K Street NW, Suite 325
Washington, DC 20006
Telephone: (202) 822-5100

Filed by Eric B. Fastiff with permission of
Cyrus Mehri