Legislative EDucation Study Committee

Policy Brief
Martinez-Yazzie Update

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The *Martinez-Yazzie* consolidated education sufficiency lawsuit, initially filed as two separate lawsuits in the 1st Judicial District Court in spring 2014, and later consolidated in November 2014, addresses whether New Mexico provides a constitutionally sufficient and uniform education to "at-risk" students. The court defines these students as Native American students, English learners, students with disabilities, and students from economically disadvantaged households. In 2019, the court found the state was in violation of its constitutional obligations and ordered both immediate and long-term reforms to the public education system.

In May 2025, the court determined the state and the Public Education Department (PED) remained out of compliance and continued to deny at-risk students a sufficient education. As a result, the court ordered PED to develop a comprehensive remedial action plan. The May 2025 order required the plan to:

- Address systemic deficiencies identified in prior rulings and identify "all the components and elements necessary for a constitutionally sufficient and uniform education for at-risk students;"
- Provide guidance to the Legislature and the executive branches of government, "particularly when making difficult budgetary decisions that need to survive political and economic shifts;" and
- Establish a path toward compliance for students named in the lawsuit and "ultimately conclude this litigation."

Key Takeaways

- In 2025, the 1st Judicial District Court ruled the state was still out of compliance with the *Martinez-Yazzie* lawsuit and ordered the development of a remedial plan *(Page 1)*.
- PED submitted a final plan in November 2025 *(Pages 1-2)*.
- In February 2026, plaintiffs file a response noting the plan lacks specific timelines, funding amounts, and accountability mechanisms and request a revised plan *(Pages 2-3)*.
- In March and April 2026, PED rejects plaintiffs' reply; Plaintiffs reassert concerns *(Page 3)*.
- The matter is now fully briefed and awaits court action *(Page 4)*.

The court's order catalyzed an intensive engagement process during the 2025 interim. PED reported it developed its comprehensive remedial action plan "based on feedback from over 1,000 participants at 12 regional community meetings and multiple targeted feedback sessions, 430 participants at five virtual feedback sessions, and more than 1,200 online survey responses." Following this process, PED submitted a draft action plan to the court in October 2025 and a final action plan in November 2025.

In early 2026, plaintiffs challenged the plan as inadequate, filing objections and a joint motion for further relief. Plaintiffs' filings argue the plan submitted by PED does not meet the court's requirements, or remedy the constitutional violations identified in prior rulings. The case is now pending before the court.

This brief summarizes key actions in the *Martinez-Yazzie* case since the 2025 interim.

2025-2026 Court Action

PED Plan Submission

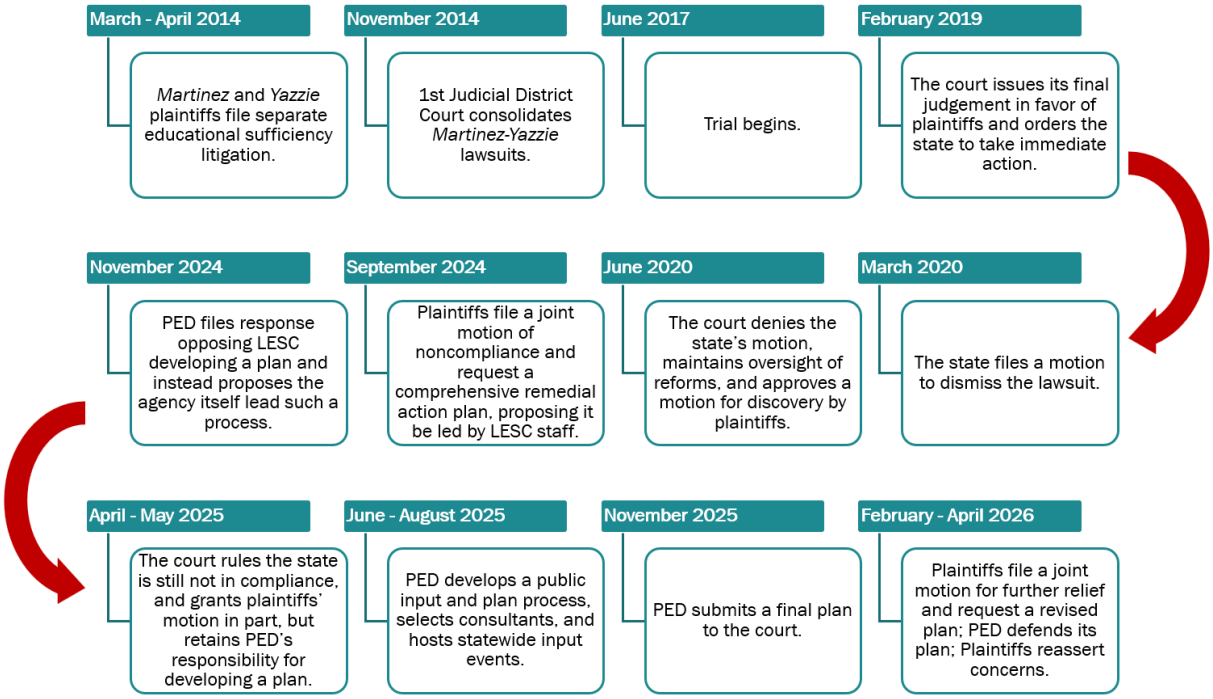
PED's revised/final action plan was submitted to the 1st Judicial District Court on November 3, 2025. PED reports it addresses five core areas based on its interpretation of requirements from the Court:

1. Equitable access to high-quality instruction;
2. Access to well-prepared, culturally and linguistically responsive educators;

3. Academic, social, and behavioral support services;
4. Fair and effective funding to meet student needs; and
5. Data and accountability systems to drive continuous improvement.

The plan was developed following a process from June through August 2025 that included stakeholder engagement, consultation and contracting with external experts (both from in-state and out-of-state), and input from state agencies and community members. According to PED, the plan is intended to provide a framework for improving educational outcomes for at-risk students and achieving compliance with prior court orders.

Figure 1: Timeline of Key *Martinez-Yazzie* Events



Source: LESC Files; LFC Files

Plaintiffs' Response

Following PED's submission of the plan, both *Martinez* and *Yazzie* plaintiffs filed formal objections in February 2026, asserting the plan does not meet the Court's requirements. *Martinez* plaintiffs filed on February 19, 2026, and *Yazzie* plaintiffs filed on February 23, 2026. In both filings, plaintiffs argue the submission is not a true remedial plan, but rather a collection of ongoing initiatives and aspirational goals that lack the specificity necessary to ensure compliance. In these filings, plaintiffs identify several key deficiencies including:

- A lack of measurable goals, timelines, enforceable benchmarks, and clear baselines that inform its goals;
- Failure to connect the proposed actions to the court's findings of fact and identified areas of noncompliance;
- Absence of detailed implementation steps, including agency responsibilities, oversight mechanisms, and lack of specific legislation and rulemaking proposals; and
- Failure to include cost estimates or a clear funding strategy to support proposed reforms.

Plaintiffs further argue the plan does not adequately address the specific needs of at-risk student populations identified in the litigation and would not result in the systemic changes required to remedy ongoing constitutional violations. In particular, objections filed by *Martinez* plaintiffs note PED would need to "heavily revise" the action plan regarding students with disabilities and also expressed concern about what would be done to provide a sufficient education for English learners.

In conjunction with these objections, plaintiffs filed a joint motion for further relief requesting the court to order PED to revise the plan in collaboration with plaintiffs and subject matter experts.

PED Response

On March 23, 2026, PED filed a response opposing plaintiffs' motion for further relief and defending the adequacy of its submitted plan. PED argues it complied with the court's May 2025 order by developing the plan through a comprehensive process that included stakeholder engagement, expert consultation, and coordination with state partners.

PED contends plaintiffs' objections "often include formatting or style disputes" rather than legal deficiencies and that the court anticipated such disagreements when it established a process for objections and responses. The PED response maintains the appropriate role of the court is to resolve specific disputes, not to require a complete rewrite of the plan, writing "to the extent the Court agrees with any of the Plaintiffs' specific objections, the remedy would be to incorporate language Plaintiffs believe is missing or to strike any inappropriate language but not to throw out the plan in its entirety." PED further writes "the existence of objections does not justify disregarding PED's work" and argues "PED has complied with the Court's order regarding the process for drafting the plan and there is no basis for rejecting the plan in its entirety."

PED also emphasizes the role of the Legislature and executive agencies in making policy and funding decisions, noting education reform involves complex tradeoffs that fall within the authority of elected officials.

Plaintiffs' Reply

On April 22, 2026, plaintiffs reiterated concerns about whether the plan is substantively adequate to remedy constitutional violations. Plaintiffs argue compliance with the court's process for developing the plan does not equate to compliance with the New Mexico Constitution or prior court orders.

Plaintiffs maintain the central issue is whether the plan, as written, will actually bring the state into compliance. They assert the current plan lacks the concrete actions, timelines, accountability measures, and cost estimates necessary to achieve that outcome.

In their reply, plaintiffs request the court grant further relief by allowing development of a revised plan with the assistance of experts and broader stakeholder involvement. They argue such a process is necessary to produce a plan capable of addressing the systemic deficiencies identified in the court's prior rulings and ensuring a constitutionally sufficient education for at-risk students. Specifically, plaintiffs "request the Court give them the opportunity to turn PED's plan into the comprehensive remedial plan previously ordered by the Court" and outline a proposed process for such work. Of note, plaintiffs' request asks the court to "order PED to contract with experts selected by Plaintiffs in the areas of multicultural and multilingual education, English learner education, special education, socio-emotional learning, school finance, curriculum design, teacher workforce development, and data systems to work with Plaintiffs to revise Defendants' Plan to include what is now missing." Plaintiffs identify the following items as missing, from their perspective, from the final plan:

1. Specific actions required to remedy each constitutional violation;
2. A five- to seven-year implementation timeline including annual and quarterly benchmarks;
3. Identification of responsible parties for each action item (including, but not limited to PED, LESC staff, Institutions of Higher Education, the Higher Education Department, the Early Childhood Education and Care Department, school districts, and the Legislature; and
4. Measurable short- and long-term outcomes and evaluation metrics that allow for compliance monitoring.

Next Steps and Considerations

At this time, the 1st Judicial District Court has now received: 1) Plaintiffs' objections and motion for further relief; 2) PED's response; and 3) Plaintiff's reply to PED's response. As such, the matter is now fully briefed and the court is expected to evaluate whether the current plan satisfies constitutional requirements and determine whether additional relief, possibly including requiring a revised plan, is warranted. LESC staff will continue to monitor the case and provide updates to LESC.