



September 8, 2016

Nevada Legislature
Legislative Commission
Las Vegas, Nevada

Dear Members of the Legislative Commission,

Thank you for the opportunity to testify on Agenda Item VI. A., the proposed regulations, pursuant Assembly Bill 394, for the reorganization of the Clark County School District (hereinafter “Regulations”) based on the plan and recommendations developed by the Advisory Committee to Reorganize CCSD (“Plan”).

Educate Nevada Now, powered by The Rogers Foundation, has provided input during each step of the process of developing the Regulations to reorganize the Clark County School District (CCSD). Proponents have worked hard in the last three months, since the first drafts of the Regulations and Consultant’s Plan were unveiled, to address many of the concerns we have had, and the concerns of others in the community.

Please allow us to raise key issues. First, we agree with critics that this process has been rushed. In spite of multiple meetings, outreach was inadequate, and proponents never developed a simple explanation of the reorganization aimed at our community’s parents. Major sectors of the community have not been involved, particularly parents from lower income areas. In town halls, most parents did not understand the proposed plan, and were unclear as to why this reorganization was necessary.

Second, the Regulations are still a work in progress, yet the impact of these Regulations will be major on CCSD’s 367 schools and 350,000 children. As a community, we are constructing a “reorganization” vehicle that is without all the necessary parts and pieces. During the Nevada State Board of Education (NSBOE) meeting last week, proponents conceded that the Regulations would have to be fixed “on the fly.” We fear that the most vulnerable children will be the ones that will suffer if this Commission proceeds to implement regulations that are still a “work in progress.”

For the record, there is no research in Nevada or elsewhere that links autonomous districts to better student achievement. The UNLV study on the empowerment pilot (The Empowerment Schools Study, February 2010) concluded that empowerment had yielded “mixed results.” Leadership, choice of the right curriculum/teaching methodologies, and authentic parent engagement were the key factors in schools achieving better student results under the empowerment model.

We attach our testimony before the NSBOE, which presented “common sense” improvements to the Regulations. Our team devoted more than 50 hours of careful study in an attempt to “fill in



the gaps,” and improve the Regulations. Because there has been no survey of CCSD principals on key issues, we also spoke to more than 20 retired and current high performing principals of Title I schools. Much of their input has guided our recommendations. We re-submit these suggested changes for your consideration.

Please allow us to clarify an area of confusion. In our August 26 testimony to the NSBOE, we recommend that no precinct be *legally* constituted without parent membership in the organizational team. We did not suggest that parents be forced to participate in organizational teams. We fear that without this revision to Section 25, some CCSD schools may continue with the status quo of little or no parent involvement. If a precinct cannot be legally constituted, a school would continue to be managed and supervised by CCSD central office, as was before the reorganization.

The NSBOE, while declining to entertain *any* changes to the Regulations on September 1 in spite of testimony and pleas from multiple stakeholders, noted that the Regulations could be amended at a future date. This is encouraging and may mark the beginning of a year-long process in which discussion of CCSD Reorg Regulations shifts to the NSBOE, with multiple amendments proposed and vetted, which would eventually be presented to this Commission.

ENN remains concerned that the reorganization will strongly benefit many schools, but many others, with weak leadership and anemic/nonexistent parental engagement, will likely see declining student results (based on the UNLV empowerment pilot findings). We believe that there must be a strong accountability system, and that CCSD central office must endeavor to protect the civil rights of vulnerable children, particularly special education and English Language Learner students.

Respectfully,

Sylvia Lazos, Policy Director
Amanda Morgan, Legal Director