



August 22, 2016

Nevada State Board of Education

Dear Members of the Nevada State Board of Education,

Thank you for the opportunity to provide input on the regulations pursuant to Assembly Bill 394, and the Amendments to the Nevada Administrative Code regarding the Clark County School District Reorganization Bill Regulations (“Regulations”).

Members of this Board have provided leadership and support to the concepts behind these Regulations, such as site-based budgeting, collaborative school governance, and local empowerment. Educate Nevada Now (ENN), powered by The Rogers Foundation, has a mission to protect and improve public education, and ensure equitable opportunities for every child, regardless of their zip code. ENN supports these innovations because they hold promise for improved teaching in every classroom at the Clark County School District (CCSD).

We attach our testimony before the Advisory Committee on CCSD Reorganization dated August 12, 2016. We believe that the following are within the scope of the authority of this Board to consider and adopt:

1. Qualified Principals should Lead Precincts. Critical to the implementation of site-based decision-making is quality leadership. Educated, committed, and qualified principals are necessary to lead teachers, staff, and the organizational team. Quality leadership has always been important to schools, but with the additional decision-making authority and autonomy inherent in the local, school precinct model, it is essential.

For example, in developing the ELL Master Plan last fall, CCSD’s ELL department documented that CCSD principals do not uniformly understand what is high quality teaching for ELL children, and how to help teachers’ instruction develop language skills for all children. ENN advocated at the Advisory Committee for central oversight of the ELL Master Plan largely due to the lack of uniform school leadership in the area of ELL. Many principals are unaware what is needed to deliver ELL services, such as appropriate professional development for teachers, cultural competence, and engaging Latino families. (The Advisory Committee wisely made implementation of the ELL Master Plan a “Central Service” in the Regulations).

In past townhalls unrelated to CCSD Reorganization, we have heard minority and low-income parents complain about how they are mistreated by principals. We have heard ELL parents complain that principals tell them that they are not obligated to translate parent materials because “we all need to speak English.” One even threatened to call immigration law enforcement against ELL parents. This is not a uniform problem, but the stories from parents of impoverished

communities, which we have all heard, raise the very real issue that CCSD has a significant cultural gap between its principal leadership and the community it serves.

ENN supports the addition in the most recent draft of the Regulation of Section 34, which calls for the Nevada Department of Education to review the skills and competencies of principals who will lead the newly created precincts. If CCSD is to improve, the principal leadership cadre must also improve.

Please consider adding the following to make this section more viable:

- a. We urge that language be added that includes input from community stakeholder in the process of determining what are essential principal competencies. We believe that this is consistent with the Every Student Succeeds Act. And, we note that minority and working class parent groups have not been very heard from much in this process, but constitute a majority in the school district.
- b. We believe that cultural competence should be a vital component of the endorsement and should be specifically mentioned in the Regulations.
- c. We urge that only principals who earn the proposed endorsement be permitted to lead precincts. Please consider adding language to this section that would predicate the earned endorsement on a demonstration of knowledge and skills, not just attending a course (and punching a card). Too many adults sit through required professional development without absorbing the new teachings so that they can be faithfully implemented. We believe that principals who do not earn endorsements should not be allowed to lead precincts. Allowances should be made for principals who struggle to earn proof of competencies; however, this project will not be successful if trained leadership is not at the helm of precincts.
- d. Consider inserting language similar to that of SB504 (2013) creating the English Mastery Council, (i) adding timelines for COPS to produce a regulation for CCSD precinct leadership endorsement, and ii) that the SBOE can step in and regulate directly in this area if there is impasse.

2. Application of “substitute” (savings) dollars in precinct budgets. We note that the current Regulations allow principals to use monies as they wish when they employ substitutes and not certified teachers. Last month SBOE heard testimony from CCSD that up to 40% of its current vacancies were for special education teachers. If a school is using a substitute to service special education children, we suggest that the Regulations be modified in order to safeguard against underserving this population by restricting the use of “substitute savings” due to a vacancy of a special education teacher to support special education services.

3. Parent Participation in Councils. We are concerned that participation from parents has been scant in the CCSD reorganization process, and our observation is that most of our parents from impoverished communities do not understand the significance of this process. For the “autonomous” precincts to function properly, there must be authentic parental leadership.

Section 25(d) of the Regulations state that the parent representative is to be selected by the local PTA or PTO. This provision may be too restrictive, in that PTAs and PTOs are “hit and miss,” particularly in poverty communities. In some schools, Public Education Foundation parent literacy groups are a stronger entity than the PTA or PTO. The Community In Schools (CIS) coordinator in some schools might have a better sense of parent leadership. In sum, we are concerned that the PTA has been largely absent from this discussion and may lack the capacity for this important task.

We suggest that the following language be deleted from 25 (d)

“The association of parents for the school, if there is one, must establish the process for nominating and electing these members pursuant to this paragraph. If no such association exists,” and instead suggest that the principal be tasked with recruiting parent leaders with the help of PTA/PTO, and other community based nonprofits whose purpose is betterment of education like HOPE, NV Succeeds, CIS, and local parishes.

4. Budgeting for “Actual” instead of “Average” Teacher Salaries. In our August 12, 2016, testimony to the Legislative Advisory Committee we laid out the reasons why the Regulation’s use of “average teacher salaries” rather than “actual teacher salaries,” disadvantages poor schools. We appreciate that the Advisory Committee modified the Regulations so that this issue is revisited by NDE and SBOE within one year of implementation.

Using “actual salaries” rather than “average salaries” is an important strategy to put in place to break the pattern of CCSD’s experienced teachers clustering in magnet schools, Career and Technical Academies, and highly-rated schools -- mostly located in the suburbs, while “focus” schools (one or two start schools for five plus years) -- mostly in the inner city -- have an over-abundance of novice teachers and vacancies. For example, at Petersen ES, a one-two star focus school two miles from the Strip, 80% of its teaching staff is one- to two-year teachers. Research shows that first- and two-year teachers who are learning their craft achieve lower student achievement.

The Advisory Committee heard testimony on the importance to successful implementation of using “actual” salaries in budgeting, on February 26, 2016, from Mr. Nadelstern (p. 44):

When we charged average teacher salaries, which we did for many decades, we began to realize schools in the poorest neighborhoods were being underfunded by as much as \$2,000 per student because they had the least senior staff and a revolving door for staff. The most senior teachers always want to work with the kids who least need them. It is human nature among teachers. So the middle class schools would have the highest salary expenditures and the poorest schools would have the lowest. We opted for real teacher salaries and the principals had to decide, based on available funds, who to hire and in what stage of their career. The union argued that there was a natural bias against more senior teachers. We did not see that, but we did see principals with a newfound focus on whether they could afford the teachers they wanted to hire.

ENN has heard from high-performing principals of inner city schools that this change would be a huge help in their capacity to improve student achievement. In short, “actual” budgeting means that a principal can hire more staff that would make a difference in raising the level of teaching quality in the building and compensate for the inexperience of their staff.

For high schools, this change could mean as much as \$500,000 in additional dollars. For struggling inner city schools like Petersen and Manch, it means as much as \$240,000 to 300,000 more a year. (The difference between Petersen’s average actual salary and CCSD’s average teacher salary is \$7500 (for 40 teachers); for Manch the difference is \$6,000 (for 40 teachers)).

As Susie Lee, the President of the Board of Communities in Schools, testified last week, “if we keep average salary cost and not actual salary cost, CCSD Reorg budgeting will be doing this on the back of our poor kids.”

5. Adequate Funding of Special Education Services. As we have previously testified, adequate funding is imperative to ensure students are given the opportunity to succeed. The Regulations provide that special education funding weights follow the student, but without adequate weights, schools will continue to struggle to serve these students. ENN will continue to monitor the development of SB508 weights, and we urge the workshop members to consider the importance of adequate funding as part of this regulatory process.

We have the potential to transform our schools and create positive and equitable learning environments for all Nevada children. At the same time, there is a possibility that these changes will mean that poverty and minority schools will have less access to resources, so we intend to actively monitor the impact of these changes and hope to collaborate with NDE in this task.

Respectfully,

Sylvia Lazos, Policy Director
Amanda Morgan, Legal Director

cc: Steve Canavero, State Superintendent