

**NEVADA DEPARTMENT OF EDUCATION
NEVADA STATE BOARD OF EDUCATION
ASSEMBLY BILL 469 SUBCOMMITTEE MEETING
FEBRUARY 23, 2022
3:00 PM**

Office	Address	City	Meeting
Department of Education	2080 E. Flamingo	Las Vegas	Room 114
Department of Education	700 E. Fifth St.	Carson	Board Room
Department of Education	Virtual/Livestream	n/a	n/a

SUMMARY MINUTES OF THE BOARD MEETING

BOARD MEMBERS PRESENT

Dr. Katherine Dockweiler, Chair
Mark Newburn, Vice President
Dr. René Cantú
Tamara Hudson
Tim Hughes
Lisa Guzman

DEPARTMENT STAFF PRESENT

Jhone M. Ebert, Superintendent of Public Instruction
Felicia Gonzalez, Consultant to the State Superintendent
Tina Statucki, Education Programs Professional, Office of Educator Development, Licensure, and Family Engagement (EDLiFE)

LEGAL STAFF PRESENT

David Gardner, Senior Deputy Attorney General

AUDIENCE IN ATTENDANCE

Ryan Lewis, Principal, Garehime Elementary School
Jeff Horn, Executive Director of Clark County Association of School Administrators and Professional Technical Employees (CCASAPE)
Kenneth Paul, Principal, W. Mack Lyon Middle School

1. CALL TO ORDER, ROLL CALL, PLEDGE OF ALLEGIANCE

Meeting called to order at 3:03 P.M. by Chair Katherine Dockweiler. Quorum was established. Chair Dockweiler led the Pledge of Allegiance and provided a land acknowledgement.

2. PUBLIC COMMENT #1

Ryan Lewis, Principal, Garheim Elementary School, provided public comment regarding Assembly Bill (AB) 469. *(A complete copy of the statement is available in Appendix A)*

Jeff Horn, Executive Director, CCASAPE provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

Sylvia Lazos, Nevada Immigration Coalition, provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

Hawah Ahmad, Clark County Education Association, provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

3. INFORMATION AND DISCUSSION REGARDING THE IMPLEMENTATION OF ASSEMBLY BILL (AB) 469 (2017)

Tina Statucki, Education Programs Professional, Office of Educator Development, Licensure, and Family Engagement (EDLiFE), provided a PowerPoint presentation regarding [Assembly Bill \(AB\) 469 Proposed Definitions and Regulatory Language](#).

Vice President Mark Newburn asked if there are any other justified reasons for absentees other than medical. Felicia Gonzales responded that the Department was able to find a more detailed definition of poor attendance. Poor attendance is defined as miss use of sick leave, failure to verify an absence in accordance with what is written in board policy, falsifying the reason for an absence, absence without authorization, repeated tardiness, or an accumulation of an excessive number of absences. Chair Dockweiler added that while employees have sick days available to take if they are ill, Clark County School District offers a flux day that can be used for purposes such as religious holidays. And if an employee has good attendance and does not use a certain number of sick days, then they accumulate personal days. Chair Dockweiler noted that there are not many options in terms of ways that employees can be absent; it is typically either sick, unverified, or personal.

Vice President Newburn suggested adding a clause to the proposed definitions and regulatory language that states a principal shall not select a substitute teacher in lieu of a licensed teacher in good standing solely to save money on the teacher's salary. Member Tim Hughes asked how intent would be proven in such a case. Member Newburn referred to recommended regulatory language regarding the requirement for a principal to document the reasons why a licensed teacher was not chosen. Member Newburn suggested including language to exclude financial reasons as a justification for not choosing a licensed teacher in good standing.

Vice President Newburn suggested the regulatory language provide additional information on the weight of evidence to be expected, stating that the bar should not be so low that the authority to use a substitute teacher is unbounded, and the bar should not be so high that principals do not have the ability to not choose a substitute teacher in the correct circumstance where the licensed teacher does not fit. Felicia Gonzalez responded that the justification a principal would have to determine if the teacher fit the school's plan of operation, which is required of every school by NRS 388G, is comprised of two parts: the school performance plan and the school budget. Ms. Gonzales noted that all positions for the next school year must be budgeted, and the school organizational team approve both the budget and the school performance plan.

Member Hughes suggested amending section 3c to say “shall develop procedures and a regular review process for principals, in instances in which a substitute teacher is selected to fill a vacancy, to. . .” in order to ensure there is active monitoring of principals and their justifications of hiring a substitute. Ms. Gonzales responded that the Department would attempt to develop language to ensure true oversight by the district for principals that may not be following the regulations.

Member Guzman asked why oral warning was included on slide 9 of the presentation and why either would take a licensed teacher out of good standing. Ms. Gonzales responded that the oral and written warning are considered written documents that are signed by both parties and would go into a teacher’s folder. Ms. Gonzales noted that a principal can still select a teacher that does not meet the definition of in good standing because an employee could receive a disciplinary document that is a one-time occurrence. Member Guzman asked if a teacher had a disciplinary document that would take them out of being in good standing and a principal could pass over them even though they were an excellent employee otherwise. Ms. Gonzales responded yes.

Chair Dockweiler asked how long a probationary period is for a licensed employee. Ms. Gonzales responded a new licensed educator to the State of Nevada is probationary for the first three years of employment. For an employee that is post probationary, if they receive ineffective evaluations two years in a row, they can also return to probationary status and start the process over again.

Member René Cantú expressed concern with allowing a developing person as someone who is in good standing and asked Ms. Gonzales to elaborate on the decision to include developing in the language rather than effective. Ms. Gonzales responded that a newer teacher should not necessarily be rated as effective or highly effective, and it is acceptable if they are developing because in most cases, they are still learning to become teachers. Ms. Gonzales noted the question that has been raised in public comment “what if the developing teacher is a post probationary teacher” suggesting to the subcommittee adding additional language to separate the developing teachers in probationary status and the developing teachers in post probationary status. Member Cantú agreed.

Member Cantú suggested additional language to provide protection for administrators who are making tough decisions putting students first and that may not be viewed kindly by the district. Member Hughes suggested an addition to items 3d of the recommended language regarding a more immediate review process prior to the June 30th date. Member Cantú agreed.

Chair Dockweiler suggested including language to require principals of a school precinct to document that they have interviewed or addressed all the licensed staff available before hiring a non-licensed teacher. Ms. Gonzales responded that the Department could add additional language to require a principal of a school precinct to specify how many available candidates considered for a position were licensed in the report to the Board.

Member Newburn asked if there was value in adding references in the regulation on what the board is expecting to be negotiated locally. Ms. Gonzales responded that she does not recommend adding what should be bargained in the regulation. Member Newburn expressed concern with the level of evidence and justification that a principal needs to show in order to hire a substitute teacher. Member Newburn stated that if the implication is that another process will address the issue, language needs to be added to specify that process or language needs to be added to specify the level of evidence and justification required. Superintendent Jhone Ebert noted that one of the bargaining units has agreed with the school district on how a process should work. Superintendent Ebert noted that the concern is if there is a licensed teacher in good standing available for a position and a school has opted for a substitute teacher, what is the reasoning and justification behind that decision. Superintendent Ebert noted that at the transfer period at the end of this

previous year, there were only 11 candidates in the CCSD system that were not assigned to a school. Out of those 11 candidates, there were only two cases of disciplinary actions.

The Subcommittee decided to allow the Department to implement the recommendations provided during the meeting and bring an update to the next subcommittee meeting.

4. FUTURE AGENDA ITEMS

No future agenda items.

5. PUBLIC COMMENT #2

Kenneth Paul, Principal, W. Mack Lyon Middle School, provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

Ryan Lewis Principal, Garheim Elementary School, provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

Jeff Horn, Executive Director, CCASAPE provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

Sylvia Lazos, Nevada Immigration Coalition, provided public comment regarding AB 469. *(A complete copy of the statement is available in Appendix A)*

6. ADJOURNMENT

The meeting was adjourned at 5:06 P.M.

APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT

1. Ryan Lewis, Principal, Garehime Elementary School, provided public comment regarding AB 469.
2. Jeff Horn, Executive Director, CCASAPE provided public comment regarding AB 469.
3. Sylvia Lazos, Nevada Immigration Coalition, provided public comment regarding AB 469.
4. Hawah Ahmad, Clark County Education Association, provided public comment regarding AB 469.
5. Kenneth Paul, Principal, W. Mack Lyon Middle School, provided public comment regarding AB 469.
6. Ryan Lewis Principal, Garheim Elementary School, provided public comment regarding AB 469.
7. Jeff Horn, Executive Director, CCASAPE provided public comment regarding AB 469.
8. Sylvia Lazos, Nevada Immigration Coalition, provided public comment regarding AB 469.

APPENDIX A, ITEM 1: RYAN LEWIS

Good afternoon. I apologize for my tardiness trying to make through Las Vegas traffic and leaving school is always an exciting time. So I'm happy to be here. Interesting, the last time I was here there was a lot fuller audience. So, it's a little different atmosphere but great to be here regardless. I'm here on behalf of principals within the Clark County School District and I also am a principal at Garehime Elementary. Again, my name is Ryan Lewis. I am passionate about this subject because I want the ability to serve our community, is best served at the site-based level. We know who our parents are. We know who the dads are and I think that having those SOT members are part of that process and really speaks to serving the needs of the students of the schools. I've served multiple schools in the valley, and they've all had similar but different needs and that's really hard to manage at a much larger scale. And we need the ability to do that. In regard to the staffing piece, I've been on both ends of the spectrum of receiving staff that worked out well for me and receiving staff that did not work out well for a variety of reasons. I really think that there's some common ground in reality taking care of people, which is what I do best. If you talk to my staff any place, I've been I take care of the staff that I have, whether it's with me or that are moving on to other places. So, I think some processes and procedures need to be changed to meet the needs of schools but also take care of the people. And I think that is possible. The word that always gets challenging is compromise, getting to a compromise where it's a win win situation for multiple people and not saying one answer or the other is the right answer. An example I shared is, you could ask colleagues when somebody gets placed on a campus. It's no fault of anybody, it's just kind of circumstantial. However, there's not a lot of vetting that goes into that prior to, and it may not be the best fit for a variety of reasons and that has worked out positively and negatively depending on how that goes, not only for the school, but for the individual person, and I think that gets neglected. Oftentimes, we're looking out for people here as well as students in schools moving forward. And nobody knows better than the people working at that school to make that happen, including the staff that's already there. Currently that is not the circumstance that we really abide by. Unfortunately, the process doesn't not take that into account. It's really holistic and this is what we do, this is how we do it, and good luck. It doesn't best serve kids, it doesn't best serve staff, and it doesn't best serve schools. So with that, I always open myself up to any questions follow up to get specifics which is, I know what you really want to know, so that you get that feedback. But with the time we have here, like I said, I'm here to be a resource to get the view of that feedback from this perspective of the site-based administrator. So, thank you.

APPENDIX A, ITEM 2: JEFF HORN

Chair Dockweiler, members of the subcommittee my name is Jeff Horn and I'm the executive director of the Clark County Association of School Administrators and Professional Technical Employees. CCASAPE represents over 1300 district administrators of which approximately 98% are Members of our association. CCASAPE appreciates the work that the subcommittee is doing to define a good standing and to the greatest extent possible. Site-based administrators want to be very clear regarding the full implementation of AB 469 all hiring decisions, especially those that impact students must be based on what is best for children, not what is best for adults. CCASAPE is the only bargaining unit that changed their collective bargaining agreement to align itself with AB 469. CCASAPE CBA ensures that the principal, not CCSD's Central Office, has the authority to select the best qualified administrators for their site. With that, with that in mind, CCASAPE fully supports today's presentation on the proposed definitions in regulatory language. This document, if approved, will allow the principal and consultation with SOT to select the most impactful employees possible to teach and interact with students. As the subcommittee reviews this document, CCASAPE would like to hear discussion and or clarification in the following areas. For your reference page seven, second paragraph, page eight, first paragraph and page nine. First paragraph, Section B. Subsection one. If I'm saying that correctly, all refer to active discipline for two years and one day we would like clarification as to which employee group is being referenced in these situations. Also, page 10 paragraph C Subsection two states that a teacher would be considered in good standing if issued a summit of rating of developing or higher. CCASAPE suggests that regulatory language in this document should be changed to reflect that post probationary teachers must achieve a summit of rating of effective or higher within the most recent school year to be considered in good standing, developing should not be considered for a post probationary teacher when determining in good standing. Lastly CCASAPE understands that probationary teachers are in the process of learning their profession. We agree with proposed language allowing probationary teachers who receive a summit of rating of develop, developing or higher to be considered in good standing. Thank you for your time and look forward to the continued work from your subcommittee Thank you.

APPENDIX A, ITEM 3: SYLVIA LAZOS

Thank you, Dr. Ebert, I am on the NIC. Comments are a follow up to our December comments and it is not on point to the regulation definitions that you are going to be discussing today. So, per your prior comments, we would be happy to simply allow those comments to be part of the public record and we would ask for the committee members to please read the letter with the specifics on it. The general gist is to thank you for following up on our concern of EL children and to please, as you go forward, carefully scrutinize how well central office services like ELL department services are actually functioning on behalf of children. So that's the summation of the comments in a little bit more detail. But appreciate the opportunity to thank you for taking our prior comments seriously and just a tickler for the committee to please keep this on the agenda as you move forward. Thank you.

APPENDIX A, ITEM 4: HAWAH AHMAD

Thank you, subcommittee, Chair Dockweiler and members. My name is Hawah Ahmad and I represent the Clark County Education Association, we appreciate the work that went into the new regulations that will be presented today, but CCEA is concerned that the suggested regulations or to the greatest extent possible, does not provide the balance that is needed in this process. As written, CCEA does not believe these regulations will provide the teeth needed to hold parties in the transfer process accountable. I want to point out specifically in slide 13 of the recommended language in that section under 3c(1) and 3c(2) it requires the district spell out procedures for principles to follow if they fill a vacancy with a substitute. It essentially just asks a principle to document that they have complied with the regulations regarding to the greatest extent possible. That's it. We do not have a process to define what happens when a principle does not comply with these regulations, the regulations, excuse me, and instead go through the motions to hire a substitute. The only thing the draft regulation states is that principals report that it gets sent Excuse me to the Board of Education before June 30 of each year, long after a teacher may find themselves out of work. Additionally, we have concerns over 3B as we see it as unrealistic with the number of teacher openings we have in the district. Though we appreciate a report going to the state Board of Education. We feel that the date at the end of the school year is just too late. We also feel that there needs to be an accountability measure that provides context for what happens if the school district finds that the principle does not fulfill their burden of finding a licensed educator in good standing to the greatest extent possible. It is our suggestion that the district has given authority to review these wavered placements and that if a principal's burden is not met, the placement of the substitute is denied in lieu of a district place candidate. Thank you so much. And we look forward to the discussions that will be had today.

APPENDIX A, ITEM 5: KENNETH PAUL

Ken Paul from W. Mack Lyon middle school out in Overton. I do have one from the discussion, cautionary word and it's when justifying with the principals of a sub or a vacancy and just something that happened to us. There was a time that our librarian left but it was also a few years ago with the cuts that were happening, and we found ourselves in a position where she left, and we chose not to as a SOT we discussed you know that we have to have enough to run the school and some of that is materials. And so there was this this situation where as a board it was very heavy and a hard decision but I can remember saying okay classroom teacher and the librarian yes, we value both but we we need to make that decision. And then as you know then I know great intentions but down the line then CCSD said no you can't do that with a librarian that librarians have to stay. And so I just caution very it's very easy unintentionally to not let that SOT and that principal take those things into consideration when they're trying to make a decision. My general point, I found this quote and applies to me as well. But it says leaders who don't listen will eventually be surrounded by people who don't speak that's by Andy Stanley. It is my belief that there are many, many site based administrators that believe a decentralized model as envisioned by Nevada legislatures would be more efficient and effective. Over the last 5-6 years. Many, including community members, became disillusioned and nearly gave up hope. Others now have no idea what the reorg is all about. Each meeting for months. I repeat the following message. It is my belief that when decision making and money is closer to the schools and communities, academic achievement and operable operational efficiency will go up. I do see that things are inching forward, and I love that. But sometimes I feel like it's not an all-in stance yet like we're all in, I'm not talking about this board. Also, I wanted to bring up on December 9th CCSD Board of Trustees passed Superintendent Jara's controversial agenda item without proper vetting with site-based administrators or SOTs that essentially re-centralized operational responsibilities known as SLAs only rural landscaping maintenance survived or left a choice. Moapa Valley and Virgin Valley. There's a critical need right now for an impartial negotiator. Moapa Valley and Virgin Valley are breaking new ground and seriously looking at contracting out this service. There are still questions surrounding the interpretation and application of this section of the law This is new territory, there's a need for an impartial negotiator that can resource the law, NDE and the Board of Ed. And then on a positive note, there are indications of movement towards solving disputed elements and increased communication between central and site-based administrators. I can see it happening including the unions. Thank you.

APPENDIX A, ITEM 6: RYAN LEWIS

Thank you, Ryan Lewis again, I just wanted to follow up. I appreciate the work that's being done by the collective Board and this committee on this issue in regarding AB 469 um and specifically the topic that we talked about today. And I wanted to speak again that I'm engaged in this conversation and listening to the conversation and want to be a part of this in a proactive, positive manner. A couple of things that I wanted to clarify from my perspective as a building another principle to give you good feedback on what this, what I hear and what it looks like on the ground in regards to the probationary employees, post probationary, and the word developing. I heard you trusted Guzman speak to something that resonates with me, when somebody changes the position there. I have got some context from that because I'm not overly in favor of developing because as a tenured employee, you should have a craft that you're better at. But there are circumstances where that does change and that makes sense. But as a probationary teacher, you're learning your craft. It absolutely is appropriate to be developing because that's what you're exactly doing. So I did hear that today that I would have come today and said I was in favor of that developing category in general just because for a post probationary, because they should be better at what they do. And we want the best in front of our kids. But I did hear that and I think we can work with that. There's some situations, attendance is something that should be addressed and in we didn't spend a lot of time on that today. But it doesn't matter where that teacher is in front of students and when they're not there, the work doesn't get done. So I appreciate that there is at least something in there to address that issue. It's never perfect, but at least it's there. Unfortunately, there are some challenges and I heard Mr. Newburn speak to not wanting to be too prescriptive in regards to the CBAs but ultimately, a lot of these challenges are as a result of the CBA. That's where the problem really lies in implementation. And there are some compromises, I think that are available and I don't mean compromises as less but compromises to achieve the goal that we're after. And unfortunately, I do agree with you that unfortunately we are not prescriptive enough to a certain degree. No action will be taken, or no movement will happen, which is kind of where we are in some of these circumstances. So I think that strongly needs to be looked at, is how do we push that to the point where we're getting forward movement and we're reaching what we want to achieve. I think we are close; I agree we're close. But what pushes us over the end of actually achieving that really lies in that negotiated agreement on all parties. There are multiple openings in the district every year. So we're not talking about one spot for every person and that's the only spot there is. You know, we had what, 700 openings in the fall. So there's room in changing the process of how we take care of people that meets the needs of what we're accomplishing here. And we need people that will come to the table to actually talk about those things and willing to compromise with a solution that we can build consensus, the ability to support without sabotage. So thank you.

APPENDIX A, ITEM 7: JEFF HORN

Thank you, Jeff Horn for the record Executive Director of Clark County Association of School administrators and professional technical employees. Just a couple of things I want to address Principal Lewis. Hit on some of them, so I'm going to shorten this up here. But I was, I just ask Principal Lewis was uh engaged with your conversation about changing grade levels, trustee Guzman and feeling as if you weren't effective but still developing as a principal's perspective, I can guarantee you if you're successful teacher, you have those qualities and skills that still allow you to be effective or highly effective because a seasoned teacher knows how to connect with kids, questioning techniques going through a lesson and methodically making sure that they're prepared for that for that grade level or whether its algebra one or ninth grade or sixth grade, whatever you're teaching that's new to you. I still believe if you're an effective teacher prior you're still going to be an effective or highly effective afterwards. And so, I think it's important to note that we look AB469, from the lens of a student and not the adult and I mentioned that earlier because that's what it's really all about right. It's about the kids, not the adults in the room. And I think if you have Children in school or you had Children, you have grandchildren or friends, everybody has kids in schools, do you, would you rather have a developing teacher or effective or highly effective teacher in front of them providing the content for that lesson. I think it comes down to that that we have to stop talking about or looking at this from the lens of adult and say what's best for the students. And I think that's where we have to be on this. And so that's why I do agree developing is good for probationary teachers. I think they're learning their craft that we can, we can look at that. But if your post probationary, I think it's important to stay with that effective and highly effective for and good standing and Just closing up here, we have the last time I checked 1300 plus openings in the district, I don't know a principal and I was a former principal for 11 years who is actively hiring substitutes to save money. I don't think it's out there. I think that you could request possibly data if there exists on that. I've never seen or heard of that happening. If there is, it hasn't come to my attention as a principle or is the executive director of CCASAPE what's every teacher that wants a job is hired right now in a position. So, there's no teacher out there waiting to be hired for a sub in the, in the placement of a sub. However, CCASAPE agrees, and I don't want to put this on the record that if there's a sub in the position and there's a teacher in good standing uh that teacher should have the right to that position, we agree with that. However, I want to put this caveat with that. If the principal is actively engaged with human resources to hire might be a student teacher or to hire out of town district teacher and they're actively engaging with human resources, then I think there should be an exception for that. Otherwise, if it's a substitute in a position, there's a teacher in good standing, we agree CCASAPE agrees that there should be a role for that teacher to become take that position as a sub. So, thank you. I appreciate the time.

APPENDIX A, ITEM 8: SYLVIA LAZOS

Dear Superintendent Ebert and State Board of Education Members:

On behalf of Nevada Immigrant Coalition, NIC acknowledges receipt of Superintendent Ebert's letter dated January 21, 2022. NIC expresses gratitude that NDE is addressing NIC's concerns regarding English Language Learners in CCSD. The theory of AB469 is that budgets, decision making and responsibilities would be devolved to approximately 370 school precincts. Retaining centralization of certain key services would allow CCSD to ensure access to quality educational opportunities, particularly by protected classes under the Equal Education Opportunity Act of 1974.

As stated in public testimony before the Nevada State Board of Education in December 2021, NIC is greatly concerned that the civil rights of ELL children are being violated by CCSD.

- In 2018, CCSD reduced staffing of the centralized ELL department by 25% and never reassessed whether such cuts impacted ELL student learning. Centralized ELL services under AB469 provide support for ELL professional training, monitoring of ELL learning and student achievement, and ensuring compliance with legal obligations under law.
- During remote learning 2019-20, approximately 6,400 ELL children were "lost" by CCSD. The Nevada Civil Rights Commission, *The Impact of Remote Learning on Equity In Nevada* (2021) concluded that "Emergent English language learners [have] had additional difficulties adapting to distance learning due to a lack of information being provided to their families in a native language." The data point of "lost" ELL children strongly suggests that during remote learning ELL children appear to have not received adequate ELL services.
- Nevada Report Card data for ELLs for 2020-21 shows that the educational learning gap of ELLs has worsened; **CCSD reported scores show that under 5% of ELL children were proficient in Math, and only 7.2% were proficient in ELA.** These catastrophic low scores should have motivated action; however, CCSD administration has not even reported these gaps to CCSD Trustees in its recent FOCUS 2024 update last January 2022. Superintendent Jara's goals in supporting materials for the upcoming February 24 meeting do not even mention ELLs and these very sad scores. Under NRS 388.407 the CCSD Trustees are obligated to monitor ELL learning and ELL/nonELL achievement gaps; however, CCSD Trustees have not reviewed ELL data for more than two years. The manner in which CCSD is operating ELL centralized services is rendering terrible results. We urge NDE to consider restructuring how ELL supports are organized under AB469 so that these children do not fall further behind.
- Last December, CCSD proposed to cut ELL central office even further, by eliminating all testers. CCSD provided this Committee verbal assurances that these cuts would not undermine CCSD ability to legally comply with testing requirements. NIC raised concerns that these assurances were not based on realities of actual school capacities, particularly for high ELL high schools that have upwards of 400 students to test and elementary schools where 30-40% of students are ELL. The cavalier fashion in which CCSD made this decision to restructure SLAs, without paying attention to whether ELL children were adequately being serviced by the ELL central department, is further evidence that the manner in which CCSD has centralized ELL services under AB469 fails to provide these students adequate educational opportunities.
- CCSD ARP spending plan devotes ZERO monies to helping ELL learning gaps listed above or to identify the "lost" ELL children and ensure that they are on track. Also, we know that high ELL schools have the most staff vacancies. Our ELL families report that children have

substitute teacher more than half of their instructional time.

We appreciate that NDE has sought assurances and evidence that CCSD is complying with its obligations to ELL children. We ask this committee to maintain a watchful eye on the civil rights of ELL students, as it moves to ensure implementation of AB469. This committee's recommendations should include how CCSD should restructure its centralized services to ensure educational opportunities of protected classes such as ELLs.

Respectfully and in the spirit of helping our most vulnerable children,

Sylvia R. Lazos, Education Committee