

**NEVADA DEPARTMENT OF EDUCATION
NEVADA STATE BOARD OF EDUCATION
JULY 7, 2022
2:00 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

Felicia Ortiz, President
 Mark Newburn, Vice President
 Dr. René Cantú
 Katie Coombs
 Malia Poblete
 Dr. Katherine Dockweiler
 Tim Hughes
 Dr. Summer Stephens
 Mike Walker

DEPARTMENT STAFF PRESENT

Jhone M. Ebert, Superintendent of Public Instruction
 Dr. Jonathan Moore, Deputy Superintendent of Public Instruction
 Jessica Todtman, Deputy Superintendent for Educator Effectiveness and Family Engagement
 Dr. Seng Dao Keo, Chief Strategy Officer
 Peter Zutz, Administrator, Office of Assessment, Data, and Accountability Management (ADAM)
 Mike Pacheco, Education Programs Supervisor, ADAM
 Craig Statucki, Director, Office of Career Readiness, Adult Learning & Education Options (CRALEO)
 Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement (EDLiFE)
 Felicia Gonzales, Consultant to the State Superintendent

LEGAL STAFF PRESENT

David Gardner, Senior Deputy Attorney General

AUDIENCE IN ATTENDANCE

Ken Paul, Principal, W. Mack Lyon Middle School.
 Chris Daly, Nevada State Education Association
 Ed Gonzales, School Organizational Team, Hickey Elementary School
 Dr. Brenda Pearson, Director of Strategic Policy Initiatives, Clark County Education Association
 Dianne Acero, Teacher, Clark County School District
 Bonnie Talbot, Data Recognition Corp.
 Christina Threton, Nevada School of Inquiry
 Sherry Pendleton, Nevada School of Inquiry
 Kellie Kowal-Paul, Chief Strategy Officer, Clark County School District
 Jason Goudie, Chief Financial Officer, Clark County School District
 Jessica Ferrato, Ferrato Co.
 Mary Pierczynski, Foster Consulting

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

Meeting called to order at 2:08 P.M. by President Felicia Ortiz. Quorum was established. President Ortiz led the Pledge of Allegiance and provided a land acknowledgement.

2. PUBLIC COMMENT #1

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

Chris Daly, Nevada State Education Association, provided public comment regarding agenda item 9. *(A complete copy of the statement is available in Appendix A)*

Ed Gonzales, School Organizational Team member, Hickey Elementary School, provided public comment regarding agenda item 8. *(A complete copy of the statement is available in Appendix A)*

Ryan Fitzgibbons, community member, provided public comment regarding agenda item 10. *(A complete copy of the statement is available in Appendix A)*

Melanie Hall, community member, provided public comment regarding agenda item 10. *(A complete copy of the statement is available in Appendix A)*

Dianne Acero, teacher, Clark County School District, provided public comment regarding teacher licensure. *(A complete copy of the statement is available in Appendix A)*

3. APPROVAL OF FLEXIBLE AGENDA

Vice President Mark Newburn moved to approve the flexible agenda. Member Katherine Dockweiler seconded. Motion passed unanimously.

4. PRESIDENT'S REPORT

President Ortiz welcomed the new State Board of Education members. President Ortiz introduced the new student member Malia Poblete from Durango High School, and the new Nevada Association of School Superintendents nominated member Dr. Summer Stephens, Superintendent of Churchill County School district. President Ortiz invited each member to say a few words.

Malia Poblete noted that she is an upcoming junior at Durango High School. She has been involved in student council for six years and has always been an observant person and not just in her group of friends, but with everybody. Student council has given her the opportunity to learn about different people and she believes that many students want this opportunity to be able to speak and advocate for their voices. Member Poblete noted how important this appointment is to her and that it is such an honor to be able to be the person to advocate. Member Poblete noted that Christina Nguyen, the previous student member, has been a great role model to her. Member Poblete thanked the Board for allowing her to serve.

Member Summer Stephens noted that it is an honor and privilege to be a part of this great group and thanked the Board for the opportunity. Member Stephens noted that she is excited for the student voice and that last month in a training that NDE put on she was able to share some student voice. Member Stephens was able to teach a class last school year in teaching and training at her school district. The student voice is the most important thing we have to bring forward, and we must do it more. Member Stephens noted that she looks forward to sharing more student voice at these meetings because it is critical as the board makes decisions because it is really all about the students. Member Stephens stated that she looks forward to sharing her expertise gained from over three States and twenty plus years.

President Ortiz reported that she had the benefit of attending the National Association of Latino Elected Officials (NALEO) conference in Chicago. The conference is geared towards elected officials from across the nation and a great majority of those in attendance were education elected officials such as school board members, state board members, and higher education board members.

5. SUPERINTENDENT'S REPORT

Superintendent of Public Instruction Jhone M. Ebert reported that in mid-June she had the privilege of speaking at the Nevada Association of School Administrators Spring Conference. This conference was a wonderful opportunity to engage with school administrators from across the State and hear about the opportunities to strengthen our collective work, as well as the challenges they are facing on the ground. Several NDE teammates hosted roundtables to provide status updates on our current work, which included the following topics: inclusive education and restorative practices for school discipline, school climate and staff support, standards and instructional support, pre-kindergarten, leadership networks, and school and district performance plans. Superintendent Ebert noted that she appreciates every opportunity to provide strong supports to our stakeholders, as well as the opportunity to hear from and learn alongside education leaders across the State.

Superintendent Ebert reported that on June 15th, NDE and its partners had the pleasure of presenting on a number of topics to the Legislative Interim Committee on Education. These topics included Competency-Based Education in collaboration with KnowledgeWorks, Evidence-Based Evaluation Methods in collaboration with Results for America, Early Learning Costs and Equity in collaboration with WestEd, Data Insight Partner's Class Size Reduction and Workforce Analysis, and Teacher Recruitment and Retention.

Superintendent Ebert reported that the Commission on Professional Standards in Education (COPS) completed 15 workshops for 15 regulations. This work centered around removing barriers to licensure and allowing additional pathways to recruit and retain effective educators for the State of Nevada. Superintendent Ebert congratulated the COPS and noted that the Department looks forward to the public hearings and reviewing the regulations at the State Board in the fall. Superintendent Ebert expressed appreciation for Director Jeff Briske and the Commissioners on this exciting and transformative work.

Superintendent Ebert reported that through AB 495, NDE recently opened a competitive grant for districts to apply for \$200 million. The focus of the \$200 million for AB 495 is to address learning loss, specifically by closing any funding gaps to address learning loss that were not adequately addressed through previous federal relief funds. NDE anticipates that it will award these funds to LEAs in mid-September so that students, educators, and our school communities have what they need to meet their local needs in addressing the impacts of learning loss. Superintendent Ebert noted that there is a separate \$15 million set aside for charter schools.

Superintendent Ebert reported that NDE has made a \$12 million investment across the State in College and Career Readiness (CCR) with its ARP ESSER statewide activities funds. Roughly half of this investment will be on providing evidence-based professional development for Nevada educators and building data systems to support the collection of CCR data, so we understand the trends and can better support the upward trajectory of our students. The other half of the funding, roughly \$6 million, is being offered across the State as a competitive CCR grant.

Superintendent Ebert announced that Gabby Lamarre has been promoted to Director of the Office of Student and School Supports. Prior to this, she served as the Title I Director and Federal Liaison for NDE.

6. CONSENT AGENDA

Vice President Newburn moved to approve the consent agenda. Member Katherine Dockweiler seconded. Motion passed unanimously.

7. INFORMATION AND DISCUSSION REGARDING THE 2022 MILKEN EDUCATOR AWARD OBELISK

Kathleen Galland-Collins, Education Programs Supervisor, Office of Educator Development, Licensure, and Family Engagement, provided a PowerPoint presentation regarding the [Milken Educator Award](#). President Ortiz presented the Milken Educator Award Obelisk to 2021 Nevada Milken Educator Ali Jun and congratulated her on her achievement. Ali Jun thanked President Ortiz and the Board for acknowledging her award and provided a brief statement on her time and work as a Nevada educator.

8. INFORMATION AND DISCUSSION REGARDING CLARK COUNTY SCHOOL DISTRICT'S (CCSD) PROGRESS RELATED TO THE ALLOCATION OF 85 PERCENT OF UNRESTRICTED FUNDS TO LOCAL SCHOOL PRECINCTS

Jason Goudie, Chief Financial Officer, Clark County School District and Kellie Kowal-Paul, Chief Strategy Officer, Clark County School District, provided a PowerPoint presentation regarding [CCSDs Progress Related to the Allocation of 85 Percent of Unrestricted Funds to Local School Precincts](#).

Member Tim Hughes noted that the percent calculations are all predicated on the fact that the restricted funds are static and asked what level of discretion the district has regarding restricted funds. Mr. Goudie responded that looking at school districts in general, they are not overly funded and most of the administrative positions are minimalized. When talking about the human resources team, there is certainly some discretion, however it is a huge job in processing 40,000 employees. Transportation is a large part of the budget and CCSD would like to grow the transportation team, CCSD is short a couple hundred bus drivers. Mr. Goudie stated there is some discretion but certainly not excess, and there are areas in the restricted funds where CCSD would like to allocate more funds.

Member Hughes asked what CCSD believes needs to be revisited around what is considered restricted under Nevada Revised Statute (NRS) 388G.610. Mr. Goudie responded that transportation is \$70-75 million and would be very difficult to decentralize given the size of the district. The inclusion of utilities raises difficulties considering that the only option for power is NV Energy and their ability to control the usage of the utility.

Member Hughes asked if there are any items within the restricted category that CCSD feels should be up for discussion. Ms. Kowal-Paul responded that CCSD central office had a conversation with the CCSD Board of Trustees regarding which services being provided under a service level agreement (SLA) should be transferred to schools, and it was determined that primarily for equity, it was not appropriate to allocate most of the responsibilities to the schools. In addition, CCSD advocated for adding utilities to the list.

Vice President Newburn suggested the AB 469 Subcommittee work with CCSD to better understand the numbers and challenges facing CCSD with the allocation of unrestricted funds. The board comes with a different perspective and a different set of powers. The end goal would be to have mutual understanding between the Board and CCSD so that the Board can provide regulatory relief and communicate with the Legislature what changes need to be made.

9. INFORMATION AND DISCUSSION REGARDING AN ANALYSIS OF K-12 STUDENT ACHIEVEMENT RANKINGS

Kenneth Retzl, Ph.D., Director of Education Policy, Guinn Center, provided a PowerPoint presentation regarding an [Analysis of K-12 Student Achievement Rankings](#).

President Ortiz noted that one of the reasons for choosing this particular item as a state goal is to, number one, change the narrative because there has been some significant improvement in student achievement, and number two is to set a lofty goal. The Board has complete confidence that Nevada students are capable of achieving greatness, but it is extremely demotivating if they are constantly bombarded with the message that Nevada is at the bottom of the list.

President Ortiz expressed appreciation to Dr. Retzl for gathering the data and helping the general public understand why these rankings differ and why the numbers may not align. The Board does know that the graduation rate was a definite impact to these rankings and Nevada will have a heavy lift to stay where it is at, if not to get higher.

President Ortiz asked Dr. Retzl to explain a bit more about stage III of the research project that has not yet come to fruition. Dr. Retzl responded that the challenges currently facing education are that there are two things trying to happen simultaneously. First, Nevada is trying to advocate for additional funding for education. Therefore, a public relations push is needed to show that additional funding correlates to improvement. Second is the question of where Nevada will plant their flag and what framework it would like to move towards. Dr. Retzl suggested that the Board lead the push to define what improving student achievement actually means and how exactly to achieve that goal. Student achievement can mean several different things such as improving AP test scores, MAP scores, I-Ready scores etc. so there is a need to be as specific as possible in defining student achievement and how Nevada plans to improve it.

Member René Cantú noted that some of the metrics that Quality Counts and Kids Counts uses are not metrics that the K-12 system have direct control over such as health, community health, and economic wellbeing, and it seems that if Nevada would like to move the Kids Count metrics upward, it would not just be an effort of the K-12 system. Yet, when there is a problem, the finger points to the K-12 system. Member Cantú asked Dr. Retzl his thoughts on the matter and what he feels to be an appropriate measure. Dr. Retzl responded that this is a question for Nevada as a whole to answer.

Member Hughes asked Dr. Retzl's opinion regarding which data infrastructures need to be invested in as a State to have the level of sophistication to do anything about any of the metrics described in the report. Dr. Retzl responded that the data system Nevada uses is phenomenal and an easy-to-use system. Dr. Retzl stated that he does not believe that data is the issue. What is needed is a coherence idea of a whole child approach to say in kindergarten, this is what we want students to learn so that we know they are ready for first grade and so on and so forth; or how have the students, schools, teachers, etc. grown instead of a set proficiency measure. Member Hughes agreed.

Vice President Newburn noted that there is a misreporting on these metrics because they are measuring a variety of things. They are measuring socioeconomic factors that have been shown to predict outcomes, but they're not a measure of the education system, they're a measure of the challenge the education system faces. Funding is not a measure of the education system; it is a measure of the resources given to educate. Trying to isolate a metric that is widely reported and a measure of the education system The frustration is further when they put all three of these numbers together which should probably never go together and they get a fourth number that is reported as the education ranking, and this is where Nevada crashes to the bottom. When talking funding and challenge, you are basically saying how much resources is the state willing to give to meet a certain challenge, which is a value measure. Member Newburn stated that his complaint has been that overall measure being reported for education is really the value the community places on education relative to other States. The fact is the Nevada education system faces some of the biggest challenges in the country with some of the least dollars in the country and still performs surprisingly well.

10. INFORMATION, DISCUSSION, AND POSSIBLE ACTION REGARDING RESULTS AND RECOMMENDATION OF THE COLLEGE AND CAREER READY (CCR) HIGH SCHOOL ASSESSMENT RFP PROCESS

Peter Zutz, Administrator, Office of Assessment, Data, and Accountability Management (ADAM) and Mike Pacheco, Education Programs Supervisor, ADAM, provided a PowerPoint presentation regarding [College and Career Readiness \(CCR\) Assessment Request for Proposals \(RFP\) Recommendation](#).

Member Stephens asked if there is a standing contract for this fiscal year for a high school assessment. Mr. Zutz responded that the Department is currently working through State process to extend the ACT contract for one year for administration in school year 2022-23. Member Stephens asked where the requirements that the pupils and school staff members should be able to access the data in the scoring rubric. Gideon Davis, Chief Purchasing Officer, Nevada State Purchasing, responded that it is the competence section of the rubric.

Member Hughes asked how the alignment to the standards are demonstrated. Mr. Davis responded that the proposal is public now because the notice of award has been released, so the Board is able to review exactly what the vendors submitted. With the exception of the items that are indicated as trade secrets from the vendors, all of the information is publicly available through NevadaEPro, the States procurement system. Superintendent Ebert asked if there was a norming process for the participants before review. Mr. Davis responded by asking if Superintendent Ebert is asking if the evaluators were trained about the evaluation process, or if they were provided materials related to what the State is doing currently. Superintendent Ebert asked, was there a meeting about the process and going through the rubric with all of the people that participated in the review process, cumulatively hundreds of hours, before they started. Mr. Davis responded that he cannot speak to whether there was an actual in person meeting versus written communication, but yes, the evaluation committee was provided evaluation guidelines, the scoresheet, a copy of the RFP, and were involved in writing the RFP. Member Hughes expressed concern with the process. The individuals evaluating should understand the depth of the Nevada academic content standards, so they are able to evaluate it against what is submitted.

Vice President Newburn noted that the current test is not aligned with the Nevada academic content standards and testimony has been provided by the council to establish academic standards complaining about the ACT test not being aligned which causes downstream problems in that these tests are used to evaluate high schools, but since they are not aligned, it imposes a new burden on those schools who suddenly have to prep the students on the difference between the two. Vice President Newburn also noted that there are issues with the ACT not having accommodations for English language learners. Both these issues cause the State to perform lower on the test than it would normally would.

President Ortiz asked what the cost and efforts for removal of the ACT. Deputy Superintendent Johnathan Moore responded that there is a transition year in which the ACT would be administered for the upcoming school year. Should a new assessment be selected, the ACT would not be used this upcoming school year and there are no financial costs since there are no contractual agreements. In terms of the implementation costs for the new assessment, these are all imbedded in the contract for professional learning, the systems transition, and the implementation of the assessment. Deputy Superintendent Moore noted that there are indeed other costs identified by switching assessments but the idea of solely selecting a new assessment in lieu of the ACT does not have any additional costs. President Ortiz asked if the transition year would give the Legislature the opportunity to put forth a bill that would continue to cover the cost of college entrance exams. Deputy Superintendent Moore responded in the affirmative.

Member Cantú noted that Nevada students are over tested, and it is demoralizing when your whole life and value is looked upon as a number on a test. Member Cantú noted that when a student completes a college

application or takes the ACT/SAT they receive a flood of letters from colleges that are interested in them and for many first-generation young people this is important because it helps motivate them to think about college and post-secondary education options. Member Cantú does not believe that when a student takes the SBAC they will receive the flood of letters from colleges. Member Cantú noted that the company that administers the SBAC was in breach of contract in 2015 because they could not handle the load of Nevada students taking their test. Member Cantú expressed concern with the fact that the raters of the new exams were not informed on Nevada's content standards as it could skew the final outcome of the RFP. Member Cantú noted that he is disinclined to move forward with this assessment.

Member Poblete noted that out of all the standardized tests students take, the ACT is something that has the most focus and is the well-known. There are several resources given for the ACT and she is unaware of resource materials for the SBAC. Member Poblete feels that if the test is changed then students will not have the same sense of importance as the ACT.

Superintendent Ebert noted that when SBAC was rolled out for the early grades online, it was not SBAC the company that was delivering the assessment. The company that currently deliver the assessment is the Data Recognition Corporation (DRC). When the rollout happened, it was a different company called Measured Progress.

Member Newburn asked if this item is something that can be postponed until more opinions can be solicited from stakeholders. Superintendent Ebert responded that the Board has three options. The Board could move forward with what the committee recommended, reject what the committee recommended which would start the process over, or hold off the decision. Superintendent Ebert noted that the reason why there is year grace period to continue with the current tool is so that the Board and the Department can begin to communicate to the community that there will be a change in policy. President Ortiz asked what would happen if ACT did not extend the current contract. Mr. Davis responded that the current contract with ACT expires in October of this year. If the new contract is not approved, the Board does not have legal justification to extend with ACT because the Department of Education was instructed more than four years ago by the purchasing division to begin this process. The ACT contract has been extended twice in the last four years against the purchasing divisions better judgment in order to ensure that students do not lose access to the assessment. By delaying this process again, there is a risk that no assessment will be available.

Member Hughes asked if the switch away from the ACT would be a switch to a criterion referenced test from a norm referenced test and what would the implications be. Mr. Pacheco responded that our current assessment is a norm referenced test and performance is compared to all other individuals who have taken the test over time. The proposed test is a criterion referenced test, thus it measures student performance based on criteria, in this case the Nevada academic content standards. All State reporting is binary in nature, students are proficient or not proficient per federal guidelines.

Member Kathrine Dockweiler expressed concern with rejecting the current proposal and restarting the process because she is unsure which new vendors would apply. President Ortiz agreed and added that restarting the process could put the Board in a legally precarious position legally because they may not have a contract with a test provider for next year which would put Nevada in violation of federal law.

Member Cantú moved to reject the recommendations and start the RFP process over. Member Katie Coombs seconded. Members Cantú, Hughes, and Coombs voted in favor. Members Dockweiler, Newburn and President Ortiz opposed. Motion failed. The item was postponed until the September meeting for a larger quorum.

11. 4:00 P.M. PUBLIC HEARING FOR REGULATION #R069-22

President Ortiz called the hearing for R069-22 to order at 5:25 P.M.

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement provided an overview of the proposed regulation [R069-22](#).

Kate Schum, Human Resources Manager, Washoe County School District, provided public comment regarding agenda item 11. *(A complete copy of the statement is available in Appendix A.)*

Vice President Newburn moved to approve R069-22; Member Hughes seconded. Motion passed unanimously.

President Ortiz adjourned the hearing for R069-22 at 5:31 P.M.

12. 4:00 P.M. PUBLIC HEARING FOR REGULATION #R063-22

President Ortiz called the hearing for R063-22 to order at 5:32 P.M.

Felicia Gonzales, Consultant to the State Superintendent, provided an overview of the proposed regulation [R063-22](#).

Brenda Pearson, Director of Strategic Policy Initiatives, Clark County Education Association, provided public comment regarding agenda item 12. *(A complete copy of the statement is available in Appendix A.)*

Kellie Kowal-Paul, Chief Strategy Officer, Clark County School District, provided public comment regarding agenda items 12, 13, and 14. *(A complete copy of the statement is available in Appendix A.)*

Ed Gonzales, School Organizational Team, Hickey Elementary School provided public comment regarding agenda item 12. *(A complete copy of the statement is available in Appendix A.)*

Member Hughes moved to approve R063-22 with the re-addition of the definition of to the greatest extent possible to the regulatory language; Member Katie Coombs seconded. Motion passed unanimously.

President Ortiz adjourned the hearing for R063-22 at 5:47 P.M.

13. 4:00 P.M. PUBLIC HEARING FOR REGULATION #R064-22

President Ortiz called the hearing for R064-22 to order at 5:47 P.M.

Felicia Gonzales, Consultant to the State Superintendent, provided an overview of the proposed regulation [R064-22](#).

Chris Daly, Nevada State Education Association, provided public comment regarding agenda item 13. *(A complete copy of the statement is available in Appendix A.)*

Jeff Horn, Executive Director, Clark County Association of School Administrators and Professional Technical Employees, provided public comment regarding agenda items 12 and 13. *(A complete copy of the statement is available in Appendix A.)*

Member Dockweiler moved to approve R064-22; Vice President Newburn seconded. Member Hughes opposed. Motion passed with 8 votes in support and 1 in opposition.

President Ortiz adjourned the hearing for R064-22 at 5:53 P.M.

14. 4:00 P.M. PUBLIC HEARING FOR REGULATION #R065-22

President Ortiz called the hearing for R065-22 to order at 5:54 P.M.

Felicia Gonzales, Consultant to the State Superintendent, provided an overview of the proposed regulation [R065-22](#).

Ken Paul, Principal, W. Mack Lyon Middle School, provided public comment regarding agenda item 14. (*A complete copy of the statement is available in Appendix A.*)

Ed Gonzalez, School Organizational Team, Hickey Elementary School provided public comment regarding agenda item 14. (*A complete copy of the statement is available in Appendix A.*)

Vice President Newburn moved to approve R065-22 with the removal of the last sentence of subsection 5, the removal of subsection 6-7, and the removal of section 3. Member Cantú seconded. Member Coombs opposed the motion. Motion passed with 8 votes in support and 1 in opposition.

President Ortiz adjourned the hearing for R065-22 at 6:10 P.M.

15. FUTURE AGENDA ITEMS

President Ortiz recommended by a presentation by Workforce Connections, a discussion on the 2023 Legislative Session, and an update from Director Briske regarding issues related to PRAXIS and licensure.

16. PUBLIC COMMENT #2

Ed Gonzalez, School Organizational Team, Hickey Elementary School provided public comment regarding the regulatory public hearings. (*A complete copy of the statement is available in Appendix A.*)

17. ADJOURNMENT

Meeting was adjourned at 6:40 P.M.

APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT

1. Ken Paul, Principal, W. Mack Lyon Middle School, provided public comment regarding AB 469.
2. Chris Daly, Nevada State Education Association, provided public comment regarding agenda item 9.
3. Ed Gonzalez, School Organizational Team member, Hickey Elementary School, provided public comment regarding agenda item 8.
4. Ryan Fitzgibbons, community member, provided public comment regarding agenda item 10.
5. Melanie Hall, community member, provided public comment regarding agenda item 10.
6. Dianne Acero, teacher, Clark County School District, provided public comment regarding teacher licensure.
7. Kate Schum, Human Resources Manager, Washoe County School District, provided public comment regarding agenda item 11.
8. Brenda Pearson, Director of Strategic Policy Initiatives, Clark County Education Association, provided public comment regarding agenda item 12.
9. Kellie Kowal-Paul, Chief Strategy Officer, Clark County School District, provided public comment regarding agenda items 12, 13, and 14.
10. Ed Gonzalez, School Organizational Team, Hickey Elementary School, provided public comment regarding agenda item 13.
11. Chris Daly, Nevada State Education Association, provided public comment regarding agenda item 13.
12. Jeff Horn, Executive Director, Clark County Association of School Administrators and Professional Technical Employees, provided public comment regarding agenda items 12 and 13.
13. Ken Paul, Principal, W. Mack Lyon Middle School, provided public comment regarding agenda item 14.
14. Ed Gonzalez, School Organizational Team, Hickey Elementary School provided public comment regarding agenda item 14.
15. Ed Gonzalez, School Organizational Team, Hickey Elementary School provided public comment regarding the regulatory public hearings.

APPENDIX A, ITEM 1: KEN PAUL

My name is Kenneth Paul, former principal of W. Mac Lyon Middle School and community member in Moapa Valley. In August of 2017 Michael Denosi, the vice president of Creative Strategies hired to assist CCSD with the implementation, refers to an accounting exercise with CCSD quote “line by line” came up with 55% with staffing and traditional supplies, 33% services that touch the school and 12% is purely central. The 33% and 12% really are the what makes up in the reorg as the A-T list or in the NRS as the A-U list. In September of 2017 that next month the same person, Michael uh said we developed a process to facilitate the decentralization resources managed by central fundamentally. However, CCSD has yet to meaningfully transfer the budget and site-based decision making as required by law to schools. That being said, they have the tools they need to do so. Now it is up to CCSD central admin and the Board of trustees to make the necessary steps to come into compliance. Later he says notable many of the responsibilities that CCSD implements with unrestricted money are also enumerated in section 16.3 A through T of AB 469. Collectively these responsibilities account for about 37% of CCSD unrestricted budget. According to section 16.7 the Board of Trustees must affirmatively vote to transfer these responsibilities without transferring, CCSD will not be able to meet the requirements of the section 18 AB469 which is the 85/15 provision. Senator Mo Denis asked in that same meeting, so in your final conclusion, you mentioned that CCSD has the tools to implement the law and you highlighted today that the full implementation of the reorganization depends on the will of the Superintendent and the Board of Trustees. Is there anything in your interaction with the district that would indicate that they don’t have the desire to do that? And then part of his answer was I think it is going to be up to this committee, the Nevada State Board of Education, and the State Superintendent to ensure that the momentum continues. Today CCSD is going to show some slides and I just want to point out on slide 15 and 16 they’re counting those service level agreements as part of the 85%. In the NAC, it said if the schools don’t have control and discretion, it cannot be counted as allocated. As that was kind of coming out in 2021, there is a deadline of January 15 for the next year coming up and on December 9, the Board of Trustees re-centralized all of those. I just wanted to bring these points up and that I think it is critical that the 85/15 be held to a standard and that was well established in the past. Thank you.

APPENDIX A, ITEM 2: CHRIS DALY

President Ortiz, members of the board, Chris Daly Nevada State Education Association. I don't really have prepared remarks for this comment period, but I did want to mention a couple of items. Item number 10 today on your agenda dealing with the college and career readiness assessment. Just wanted to redirect you to comments that we made last month on this topic. We believe that the Board of Education should focus on streamlining required State assessments uh and recommend to the Legislature an amendment of NRS 390.610 that if you believe in continuing college and career readiness assessments, we would strongly recommend engaging a diverse group of Nevada Educators to develop meaningful proficiency exams. Then, on item number 9 related to the Guinn Center's review of National Education Rankings did want to publicly express our appreciation for the work of the Guinn Center on this. I know that I have been one to talk about various rankings typically around the funding, but I did want to read a couple of paragraphs on page 11 of the Guinn Center report related to a jump in the quality counts rankings starting about halfway down. Additionally, the recent jumping of Nevada's national rank from 36th in the K-12 achievement rankings to 18th in 2021 is likely led by increases in graduation rates and changing graduation rate over time. While this change should be celebrated, it is primarily due to a policy decision to remove the high school proficiency exam from the graduation requirements. While previous research has suggested this policy change positively affected several unrepresented groups, this positive outcome cannot be attributed to significant changes or improvements in K-12 education processes. In the 2021 rankings, Nevada is ranked first in the nation in the change in graduation rates over time. This high ranking in the change in graduation rates will likely decrease in future reports. Currently in the 2021 rankings, the graduation rate change is measured from 2014 to 2019. In the 2013 rankings the difference in graduation rate was calculated based on 2000 and 2008 graduation rates. Future rankings will likely continue this pattern of increasing the starting year of the comparison. When the starting year surpasses the first year of Nevada's change in graduation requirements (the 16-17 school year) this ranking will likely decrease, assuming there are no significant graduation rate improvements based on policy decisions or growth within the districts. Um, I know that there was a lot of discussion, was it last year or the year before about a goal of the Board. Um, I think given what Guinn Center is doing, perhaps the board should reconsider its goal making with regards to rankings. Thank you.

APPENDIX A, ITEM 3: ED GONZALEZ

Madame President, members of the Board. Um I did submit public comment on there just in case I extended. They do include all three of them, but I will also speak on those items individually. They will be brief on those regulation hearings. Um, I'm speaking specifically on item 8. Um, I think along with the Board would like to see the 85-15 presentation. We've had long conversations about it. I feel like I'm in a time warp in a broken record because I've heard conversations about this multiple times over the last 5-6 years. I do want to highlight a couple of things. I've had conversations with trustees. It seems like even in this presentation there's talk of the 85-15 and the A through U list being restricted and being placed outside of the 85-15 ratio because it is how the district reads it. I did submit conversations from the 2019 legislative session SB 469 where both government affairs breaking with the CCSD government affairs, and I were asked by chair Edgar Flores to submit what our concerns were. I submitted mine and responded back and based on that, they actually pulled out that language and so I think the legislative intent is pretty clear the 85-15 and the A through U list is not outside of it. Um second, we also talk about the ability for schools to use those dollars. And just because dollars are in the strategic budget, it still doesn't mean they're flexible. And I'll give you a good example. Custodians as a budget augmentation on an SLA and so they don't have any opportunity to do anything really with that except if a principal retires, they cannot do that. Um I submitted this on the record. I do have a hard copy. This is a presentation from October 26, 2017. The Framework of actually allowing ten schools to do a pilot program for it. Ultimately, it wasn't passed, they failed on a 5-2 vote, and this was before SLA's but it gives a framework of how this could happen. And so you hear conversations again. I heard it last time as well and other meetings and CCSD um subcommittee on 469 how there's a struggle for that or that principals would give it to their friends which would be just be against policy in general if there is a conflict of interest but under a prior superintendent, another senior administrative staff, they have tried to push forward with this. And then finally um, I just want to mention that the district has been part of this process the entire time. Whether they were on the technical advisory committee with then Superintendent Skorkowsky and then President Linda Young. Um the community implementation council has madam president you're well aware of on there with a couple trustees on there or if you're talking about the SOT working group where they had a senior administrator on there. This is something that the district has been working with the whole time. And so, I may have more comments afterwards I'd rather get to the presentation than talk more on it. So, thank you.

APPENDIX A, ITME 4: RYAN FITZGIBBONS

My name is Ryan. My kids are high school students in Las Vegas. This is a condensed version of a letter I had sent to the board encouraging them to stick with the ACT as the 11th grade College & Career Readiness test. As someone who has spent the past 20 years helping students earn scholarships and get into college, I'd suggest the ACT for five reasons.

1. Consistency. The last thing teachers, schools, and especially kids need right now is a moving target. Changing tests would ruin our data and make it impossible to know how we're doing relative to prior years. Our schools have never been so under-staffed. Is this really the right time to start a test nobody's ever heard of and try to convince the teachers to have the kids prepared to take it by February? That seems really risky.
2. College Usefulness. Colleges *only* use the ACT and SAT. Of the 2,000+ universities that use test scores in admissions/scholarships (some test mandatory, many test optional these days), not a single one uses the proposed Data Recognition Corporation DRC Test. None. They all use ACT/SAT scores. Why would Nevada swap out a test that matters for a test that is completely meaningless? And why would a student try at all on a test that nobody will ever look at or care about?
3. Changing tests will reduce college access to Nevada's neediest kids. 99% of universities, including every college and university in Nevada, use ACT or SAT scores to help determine class placement freshman year in college. Students who don't take the ACT or SAT are far more likely to end up in remedial or co-requisite college classes freshman year. Kids from wealthier families will still sign up and pay the \$60+ to take the ACT on Saturdays as often as they want. Poor kids will be less likely to be able to sign up for the ACT on their own or to have access to a ride to a test center on a Saturday.
4. Study material. You can't find a full length practice DRC high school test anywhere. They have one webpage online with about 5 sample questions for each type of section. There are dozens of free practice ACT tests available everywhere for students, teachers, and counselors.
5. Let's learn from history. DRC is the same company that Nevada paid \$50 Million to back in 2016. They failed to send over 200,000 students' test scores for months and eventually quit taking our phone calls! Nevada had to threaten to drag them to court. We're not really going to do that again are we?

Bottom line: we currently have a test that works well, provides consistent academic standards and data, and helps students get into college. Why would we change to a company that ripped off our state in the past, a test that no college will use, a test that teachers will have to learn how to teach and proctor, that won't count for anything or benefit students in any way, and that will cause parents to have to pay an extra \$60 out of pocket if they want their kids to take a test that colleges will actually look at? If it's not broke, don't fix it.

Ryan Fitzgibbons

APPENDIX A, ITEM 5: MELANIE HALL

A student needs a 3.0 core GPA in order to be admitted into UNLV. If they are short of that, the ONLY way they can still get in is to get a 22 on the ACT or 1120 on the SAT. <https://www.unlv.edu/admissions/first-year> In the past, Nevada's mandatory ACT test has saved so many students. By scoring a 21+ on the ACT they instantly qualify for the \$10k Millennium scholarship. Please don't take that away from them. Rich kids will be able to take the ACT as many times as they want. Our students at Desert Pines, Mojave, Rancho, Eldorado, and other low SES schools around the state often struggle to register, pay, and get to testing centers on weekends. The statewide ACT test gives everyone the opportunity to take the test for free during the school day. Under the current system, a Nevada student with a 2.5 GPA can walk into school one morning, get a 22 on the ACT, and walk out that afternoon with a \$10,000 scholarship and guaranteed admission to a 4-year university. Why take away their one chance to take a test that actually counts and replace it with a test that doesn't count for anything?

APPENDIX A, ITEM 6: DIANNE ACERO

Good afternoon, State Board members. Um I am here to be advocating for myself, my colleagues, and our students. I ask you to make a change on teacher licensure. I have taught early childhood here for four years, going on five at CCSD. In March my provisional license expired because I am unable to pass some of the praxis exams. Yet, I have a master's degree in TEASL and a bachelor's in early childhood. I am a highly effective bilingual teacher. Because I am unable to pass some of the praxis exams due to testing anxiety. My pay will go down to a sub pay. I will lose medical insurance for me and my family of five that depend on my insurance. The CCSD benefits department told me if I wanted to keep my insurance, I would have to pay over a \$1000 a month on a sub pay. I have tried numerous study programs free and paid. I have hired tutors spent thousands of dollars attempting to pass these exams. I am asking you if you can approve an emergency motion on either removing these exams from licensure or making something that will make our teachers help us out, allow our teachers that are in the same situation to receive another additional extension or an additional provisional license while these new changes are put in place so that we don't receive a huge pay cut. I have been told to contact the commission on professional standards and that they are the only ones that can make these changes happen. CCSD has a high rate of teacher vacancies. There are so many teachers who have had to switch careers because of these exams. I would like to propose a change in education to help out our teachers to that they shouldn't have to lose their jobs over a test that doesn't define whether the teacher is effective. This is a huge issue that needs to be changed now. Too much time has gone by and no change to better our teachers. Thank you for understanding and I hope to hear some effective changes that will help our teacher shortage before the new school year.

APPENDIX A, ITEM 7: KATE SCHUM

Washoe County School District would like to express its full support for the recommended changes being contemplated under item 4 regarding paraprofessionals. Since 2019/20 if the cut score had been 455, we would have been able to hire 24 additional people. These paraprofessionals play a critical role in the support of our students and their academic, social and emotional success that even missing out on 24 is a big loss. Our employee screening process continues to be robust and these testing requirements are only a piece of the larger puzzle in finding the right employees to serve our students. Please support the recommended change to make this line of work open to a more broad sector of our community serving our most deserving students.

Thank you.
Kate Schum

APPENDIX A, ITEM 8: BRENDA PEARSON

Thank you, President Ortiz, and Board Members. My name is Brenda Pearson, and I am the Director of Strategic Policy Initiatives at the Clark County Education Association. Before this Board today recently was a presentation on the proposed regulation of NRS 388G.590. The new regulation, as it stands deletes the definition of “to the greatest extent possible” in its entirety. CCEA supported the previous language in the proposed draft regulation which stated “to the greatest extent possible shall mean that the school district has completed all reasonable due diligence prior to extending an offer of employment including the required by NRS 391.850 through 391.930 inclusive, and the principal justifies that prospective hiring satisfactorily meets the needs of the local school precinct” Over the last several months, the Board of Education Subcommittee 469 focused on the issue of the selection of the staff by concentrating on clarifying and defining two important passages under consideration in good standing and to the greatest extent possible. At the conclusion of the subcommittee’s meeting, they proposed draft regulations that defined both in good standing and to the greatest extent possible and CCEA supported those proposed regulations and drafts. Furthermore, the definition of to the greatest extent possible highlighted NRS 391.850 through 391.930 to make clear that the principal must comply with employment laws as well when selecting staff. It is to our understanding that LCB recommended the definition of to the greatest extent possible but did not prohibit the removal of this definition to be included, which means that it is under the purview of this board to include this definition and in line with recommendations by the AB 469 subcommittee. Today’s draft regulations leave “to the greatest extent possible” up to the interpretation of the district and more importantly, up to the interpretation of the school principal. It merely states that the district must develop procedures and requires a principal to keep records. This vague and ambiguous language is not what we thought was the intent of the subcommittee when the subcommittee took on this work to provide clarity and guard rails to what it means to select staff. Accordingly, CCEA is no longer in support of the draft regulations as proposed today. Thank you.

APPENDIX A, ITEM 9: KELLIE KOWAL-PAUL

Thank you, Madam President, members of the Board, Superintendent Ebert. Kellie Kowal-Paul for the record. Chief Strategy Officer for the Clark County School District. My comments for your consideration this evening will apply to items 12, 13, and 14 um on the agenda. The Clark County School District has substantially complied with the provisions of NRS 388G and disputes the defamatory rhetoric from this Board that declares the district in open defiance of the legislature. Last week I provided a brief implementation report to the CCSD Board of Trustees, AB 469 Subcommittee that illustrates continued effort and progress by the district. The district continues to work toward compliance envisioned in the 2018 joint implementation plan. We worked collaboratively with the former Superintendent of Public Instruction to confirm progress and refined interpretation, and we have continued that collaboration with the current Superintendent. Since December of 2020, the district has collaborated with the Department through regular communication related to the reorganization. We have responded comprehensively to written requests for information received from the current State Superintendent. More recently, we have held frequent virtual meetings and telephone calls between the Superintendents and other leaders of our two organizations to further our progress. In fact, at this very meeting, we presented information that we had discussed with the Department over a series of calls and meetings. Finally, in April of this year, we submitted to the Department our own assessment of compliance with both the initial actions from the joint implementation plan and also with the items to be resolved that the Department presented to this Board in 2021. Though the Department has not shared with us their level of agreement with that assessment, they have agreed to meet with us to come to a consensus and collaborate on next steps. Before this week, we had not received a notice of noncompliance from the Department since 2018 and even now there has been no notice form the Department that warrants the proposed regulations on this meeting's agenda. The prevalent narrative and meetings of this Board that the district is purposefully out of compliance is not only false but counter to the relationship that the district has with the Department and the continued collaboration between our two organizations. This rhetoric has fueled the development of proposed regulations that represent an overreach beyond the authority of this Board. Under Nevada law, the proposed regulations conflict with the authority of the Legislature to mandate dispute resolution processes established consequences for statutory compliance, impose financial obligations, and determine requirements for boards of school trustees with the authority of boards of school trustees to set their own agendas, oversee collective bargaining, and participate in training, and with the authority of principles of local school precincts related to the establishment and training of school organizational teams. Some of the proposed regulations on today's agenda are founded on false assumptions and are arbitrary and capricious. Thank you for your time.

APPENDIX A, ITEM 10: ED GONZALEZ

Thank you, Madam President, Superintendent Ebert, members of the Board. You do have a final public comment at the end, correct? So, I'll stick to the regulation. Um I do appreciate this regulation. I just want to highlight two points onto there. I think section one of the training, I think that's a good idea. We haven't had a really large training since we had the onboarding event at Silverado High School. I think it was after the first year where it's very in detailed of what it was. We haven't had anything since if you go on to the CCSD reorganization website. Um, there's some videos up there 2-3 years old. I've been a community member on an SOT which means the SOT has to vote for me after the first meeting. That's always an interesting experience. But you know, I appreciate the fact that I'm included in here. I just think that as we move forward, I think that's one of the districts, just not to forget some of the members as well. And also, beforehand when people want to run for it, when they sort of get they sort of get a message from the principal say anybody interested in this and most parents and you still don't know what this is. So, and then I just want to highlight also section nine, I think its good if there's any disputes and resolutions that it should be paid for by the district only just because I think the average precinct wouldn't have the fiscal need if anybody's been into a court case, um anytime when you have into it, you realize those bills add up extraordinarily fast even before you get to a basic hearing. And so it shouldn't be if a school precinct thinks that something is not happening properly. And I will just highlight on one thing. I've been to the AB469 subcommittees at the district, and I feel like it's a night and day difference between what you guys are saying and what they're saying. And so, I do feel like that there are going to be disputes and I will say that more of that into the final public comments. So, I'm supportive of this. I am neutral and other stuff where it comes to the teachers. I feel like that's a conversation between principals and teachers. So, thank you.

APPENDIX A, ITEM 11: CHRIS DALY

The Nevada State Education Association has been the voice of Nevada educators for over 120 years. We are submitting comments related to R064-22 – which proposes to interpret the phrase “other staff who work under the direct supervision of the principal” within NRS 388G.610.

NSEA agrees with the April 25th letter submitted to the Nevada State Board of Education from Dyer Lawrence that stated, “By using the word ‘direct’ in the manner it did, the Legislature plainly stated that the principal of a local school precinct has the selection authority only over the support staff employees that the principal ‘directly supervises,’ meaning there is no intervening supervision by another CCSD employee.” The proposed draft regulation language being considered would make this selection authority applicable to nearly all education support professionals (“ESPs”) at a school site. If the Legislature had intended to address all ESPs at a school site, it would NOT have added the limiting language that requires “direct supervision.” Moreover, the language in R064-22 proposing to exclude ESPs who are a member of central services is redundant of the language already in subsection 6 of NRS 388G.610 and would render that language surplusage. Therefore, altogether, NSEA submits to the Board that the proposed regulation is simply not within the language of the statute.

Instead, NSEA is strongly recommending language submitted by the Education Support Employees Association. This would define “other staff who work under the direct supervision of the principal” as “***support staff employees who report directly to the principal without any intervening supervisor or evaluator. In a typical school setting, examples of such employees would include, but not necessarily be limited to a school office manager, a head custodian, and a building manager.***”

Thank you.

APPENDIX A, ITEM 12: JEFF HORN

Good afternoon President Ortiz, members of the Board, and Superintendent Ebert, my name is Jeff Horn and I am the Executive Director of the Clark County Association of School Administrators and Professional-Technical Employees. We represent over 1350 administrators in the Clark County School District of which approximately 98% are members.

CCASAPE is in support of item #12 and item #13 and appreciates the work of this Board along with the efforts of the SB 469 subcommittee to create regulatory language defining “in good standing and to the greatest extent possible as well as “other staff who work under the direct supervision of the principal.”

This postposed language will ensure that principals finally have the ability to select the best available professionals to lead and instruct our students. CCASAPE encourages this Board to approve these items as we move closer to realizing the full implementation of AB 469.

Thank you for your time.

APPENDIS A, ITEM 13: KEN PAUL

Kenneth Paul, former principal W. Mac Lyon Middle School. I'm in full support of this noncompliance regulation going forward. Just the talk of being defamatory to talk about noncompliance issues. It hits me hits me wrong. I can point out two things right away. No dispute resolution process was in place, the one that's already on the books and the 85/15, they're admitting today that it wasn't actually in the school, you know, that we didn't have controller discretion have those monies within the schools. Um, I wanted to reiterate again, this was from that same person that was on the committee helping CCSD implement it without transferring. Talking about those A through T which are now A through U without transferring CCSD will not be able to meet the requirements of section 18 of AB469 which is the 85/15 provision. And then something I didn't share before; this is from Steve Cannavero in December of 2017 talking about service level agreements just as an example. It says if a local school precinct has just handed a stack of service level agreements or a single service level agreement and is told to sign which we don't even get to do that. They have really no authority perceived or real to negotiate or to change or to push back. Then it just simply calcified existing systems that are in place and that and that runs counter to the idea of the reorganization. So that's something we are thoughtful of and need to be thoughtful of as we continue to work through that. He also said in addition to the service level agreements and others, we've also defined the term allocate. Allocate is a very important term and Cher Roberson right after that wanted to really emphasize, he says so I don't want anyone to leave this room today without with any confusion over what we intended by the definition of allocate. It was quote "transfer money to the schools" end of quote that is the whole point of the reorganization from day one. Just as an example with utilities and 16 and 17 our school are SOT went and we were wanting to negotiate that SLA and it was Jason Goudie the CFO that basically shut that conversation down and it didn't go anywhere. Um I just feel like again just stating that there's been lots of patients for five years of the delaying and the not complying with the reorg and I just think again if we want to see substantial change in our schools, we've got to get the decision making and the money closer to the schools and especially closer to the communities. Thank you.

APPENDIX A, ITEM 14: ED GONZALEZ

I am in support of this regulation, I think before, um, was it November 2020 when concerns were brought before this board. This bill was essentially stillborn. It had passed, it had not been implemented, and it sort of nothing was happening and there's a lot of times not just in education, but in other parts of government as well. Where sometimes laws are not followed, and you sort of don't know what the recourse is. All this is it creates a framework. I don't think anybody wants to get to the point of receivership. In fact, hopefully, you know, you just have a resolution, you have a hearing. You guys can figure it out. I mean, it's I mentioned previously in another regulatory hearing um, you sort of just like you said, figure it out, you get together and go, okay, this is what we can get to. What I appreciate about Ken Paul is that Ken Paul, when they were trying to figure out the allocation for the small schools, he had a dispute, and they had a concern and there was no mechanism. And so, with Steve Cannavero, the then State Superintendent, he went there, and they had a conversation to figure out how to get to a resolution, but most people can't do that. And so, I do appreciate the subcommittee, I appreciate the support coming up with a basic framework of, of what we can do if there's a problem and what's the next level and what's the next level? Like you said, it's in tiers. Once again, I want to highlight, nobody wants to put anybody in receivership, that should not be the goal. The goal is to implement the law and make sure things are happening in general. So, I appreciate board onto this. This is a good policy. It is very clear on what you're trying to do. The process is simple and that's what I think these regulations do. So, I appreciate the time and effort of Chair Dockweiler for the subcommittee Madam President, State Superintendent Ebert, Member Hughes, Member Newburn and everybody else who I have forgotten to mention. Um. I do appreciate the hard work because I've mentioned previously, this is something you guys could have kicked down the road. It would have been really easy to do and had been done like that for a while where people just weren't paying attention. You chose not to because you chose to solve a problem. Thank you.

APPENDIX A, ITEM 15: ED GONZALEZ

I just want to highlight a couple of things. On the regulatory vote, if member Newburn, if you think it will we get closer to compliance with taking off the receivership, I think that's something that can be understandable. Um, I know in the regulation 120 days, you guys, it could be brought back in a much shorter time frame. Um, but I do feel like the conversation that they had on the 85/15, the idea that they said these items from A through U are restricted. To me, that seems like a categorical change from what they've talked about before. It seems like they went to the legislature in 2019 and that was a bitter fight on there for what that language that they wanted, which the legislature did not put in. In fact, Mo Denis's idea what he said in the record was not to take money out of schools when he was trying to propose that language and to watch that happen to say, well now we've decided to do that. To me, it was a little surprising. Second, even though, and I talked to member Hughes about this during the break, when they looked at the 85/15, Mo Dennis, actually, Senator Dennis wanted to actually move it up to 90. That wasn't something I would support just because the district says they have trouble at 85. But ultimately, I think we need to get the challenge of the 85/15 I really do mean it when I say it feels like a broken record, its this is the same argument that we've had. Um, I was on a radio program, KNPR was at the end of the 2016 election is 2017. We're having the same conversation a whole hour just talking about this in circles. And so, um I would just highlight one more thing as well is that if you're going to look at the 85/15, I'd also ask you guys to look at the HCM system. The Human Capital Management system, \$17 million was given by the State. It rolled out atrocious. Um, I know the district has spent millions of more dollars. I think there are questions of how good that system is not based on cherry roading the platform, but from the poor planning of what can it do? Can it do the things that are necessary? And so, I know it's within the purview and my fear is that like when they remove the SLAs that also checked \$12 million dollars from carryover that comes from that like transportation, you know there's some savings that they weren't hiring staff that they got back int that they got back into other stuff as opposed to utilities. So, when they came here to the Board and said we're going to resolve these issues and then they pulled back those SLAs, I think that surprised everybody. But it also meant that dollars that were going to schools are now going back to the central office, so they don't exist. So, I would ask as we look to the 85/15 to start looking at some of the other stuff as well. I know it's a lot of work and Chair Dockweiler, I know I've asked you more stuff, so I apologize but I think the intent is right. Get to compliance. I said before, nobody wants receivership that's definitely not the goal. If we can get to compliance and we can work it out, I think we all can live with it. So, I appreciate the comments. Um, I know my phone blew up when they saw, oh no, they're gong to take of receivership. If the goal is to compliance, then that's where we got to get to. So, I appreciate that. So, Thank you.