

**Public Comments for the State Board of Education meeting 10/4/23, Agenda Item # 7 School Start Times
(Other than line spacing, font size, or font color, these have not been edited.)**

Kiyana Nana,
Student

To Members of Nevada State Board of Education,

I am currently a student at Spring Creek High School and it has come to my attention that a meeting is scheduled tonight regarding the public school start time. There are two points that I am mainly concerned with and its 1. how this planned schedule will affect hundreds of students throughout our district and 2. how I came about this information.

If I were to take a survey for the students of this institution, I am willing to bet that at least half of the students here will have some sort of complaint about the major change you applied to us with the 4-day school week. This change that you are proposing now is, to my personal opinion and others, completely impractical. Clark currently starts school at 7:30, Spring Creek starts at 15 mins earlier. Which might not seem like a lot but trust me it is. The extra 45 minutes that you are offering is not worth the cost of getting out in the late afternoon; neither does it make sense nor does it help our sleep schedule.

A few friends of mine are well involved in sports. With our current out, their practice starts at 3 and ends at 5. If this new schedule is implemented, they will be at school until 7. Just a gentle reminder that gas is not cheap and most of these people need jobs to continue this daily function.

Lastly, I am begging you to further notify the students that you are trying to implement these changes because they are the ones that have to deal with it.

Kirsten
Lallana,
Student

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Jolie Hoene,
Student

Hello members of the board!

I am a student at Spring Creek High School, and I would like to give some input on the 8:00 am start.

If we start at 8:00, we would leave school at 4. This is something that would negatively affect a lot of students, because many students do activities after school. I am in Speech and Debate, and I already don't get home till 4:40 or 5:40. I'm sure this is the same for other clubs/sports.

The late dismissal for school would mean that those of us in extra curricular activities would not be home until around dinner time or later.
 Those with jobs would probably lose said job because they can't work enough hours. My brother starts work at 4. He would lose his job and then lose the opportunity to fix his truck. He then loses his transportation.
 I already struggle with having enough time to do stuff when I get home, but a whole extra hour being taken away would be even worse. I'm positive this is the case for most students. I highly suggest you rethink this decision for the betterment of the students. This is what this was about, right?
 Thank you. - Jolie Hoene

Patricia Haddad
 Director,
 Government Relations,
 Clark County School District

Good afternoon, Vice Chair Dockweiler and Members of the Board.

My name is Patricia Haddad, Director of Government Relations for the Clark County School District, here again to share our opposition to item seven regarding “High School Start Time Regulations,” inexplicably narrowed from all schools in name only. There is no shortage of reasons this proposed policy should not move forward, as you are hearing from subject matter experts as well as Superintendents throughout Nevada.

- It is inappropriate overreach for the State Board of Education to contemplate a regulation they have no statutory authority to create.
- The time any particular school starts is a decision the legislature leaves up to local districts and school communities based on the needs of that community and available resources.
- Should this board move forward with this regulation, you will be forcing an unfunded mandate on school districts. The State Board of Education has not seriously considered the financial burden on district operations or families’ pocketbooks when forced to seek additional childcare.
- CCSD schools already have the option to submit a waiver to the district to adjust their start time based on the unique needs of that school community. The costs associated with that waiver must be covered by the school’s strategic budget. One of our high schools changed their start time and experienced no meaningful difference in attendance between the earlier or later start times.
- Neither this board nor the department engaged school districts in the development of this proposed regulation. Community members have not been meaningfully engaged, as there were only three meetings statewide, with staff outnumbering attendees.
- The regulation forces school districts to “survey” their communities after the regulation is passed. By then, it will be too late to change anything as the damage will have already occurred. This regulation will impact hundreds of thousands of children, families, and households in Southern Nevada. Pushing it through in spite of the real

	<p>concerns elevated today and shared throughout this process is an affront to the constituents who will be impacted.</p> <p>We urge the State Board to pause the development of this regulation and engage meaningfully with stakeholders throughout the community, as this policy will impact hundreds of thousands of households throughout the state.</p>
Krystal Goddard, Student	<p>To Members of the Nevada State Board of Education,</p> <p>I am currently a student at Spring Creek High School and it has come to my attention that there is a vote tonight regarding a mandated start time for schools in our district. I think I speak for most of the students in Elko County, but especially the students at Spring Creek High School, when I say that the extra forty five we get to sleep in the morning is not worth how late we will get out of school.</p> <p>Currently we start school at 7:15 am, and while many students would appreciate being able to sleep more in the morning staying until 4:00 or possibly 4:30 in the afternoon is not a viable option for the students.</p> <p>Many students, specifically at Spring Creek High School, have extracurriculars or even work after school that prevents them from going home until late at night. Having students stay an hour and a half longer will only result in; dropping grades for students because they don't have time to sleep, participate in their extracurriculars, and do their homework; less participation in all extracurriculars since students will have to choose between good grades, sleep, and their activities; also, there will be kids that drop out of school entirely because they can't juggle work to support their family and school.</p> <p>Once word of this possible change spread throughout my school I discovered that most of the people I know are going to switch to online school as to not deal with having to stay later. Students are more willing to suffer through online school that provides a lesser education than stay at a physical school and deal with this change.</p> <p>Even the elementary students would suffer from this decision as they currently have to start an hour than the high school and middle school because there aren't enough buses to transport all the kids. This would either result in the district having to pay millions of dollars to buy buses to carry all the kids or it would result in small children walking home in the dark during the winter months.</p> <p>Excluding how starting later will effect the students it will also negatively impact the teachers and coaches of the school district. Teachers will have to stay until 5:00 or 6:00 which will severely cut into their family time even without including the personal time they have to use in order to complete their lesson plans and grading. If that teacher also happens to be a coach, like many of the teachers at my school, they will be at the school until after 10:00 pm which will make their personal lives nonexistent.</p> <p>All students will be negatively effected by this decision including those in elementary school. The elementary school starts an hour after the high school and middle school as there are not enough buses to transport everyone. Therefore, if the high school were to start at a later time the district would either have to spend millions buying new buses to transport all the kids or they would have to let their small children walk home in the dark during winter months.</p>

	<p>Even the teachers and coaches that work for the schools would be negatively impacted by this decision. Teachers already have to remain at the school to get in their designated hours and if that teacher is also a coach, they go home even later. Having to stay at the school later would severely cut into the time they are able to spend with their family. This isn't including the personal time that teachers spend each day to make sure the lesson plans and grading are done which would make their personal lives nonexistent.</p> <p>I sincerely hope that you take the contents of this email into consideration when you are making your decision as this decision could majorly impact everyone in the school system, not just students.</p> <p>-Krystal Goddard, Spring Creek High School</p>
<p>Rick Harris Executive Director Nevada Association of School Boards</p>	<p>I am writing on behalf of the Nevada Association of School Boards to reiterate our steadfast belief that decisions regarding school start times should remain under the purview of local school districts. It is important to emphasize our position that we do not support the implementation of statewide regulations governing school start times.</p> <p>Local school districts, with their intimate knowledge of their communities and students, are best suited to make informed decisions about when school should begin. They can consider various factors such as transportation logistics, family needs, and community preferences to tailor start times that align with the unique circumstances of their respective districts.</p> <p>Sincerely, Rick Harris</p>
<p>AJ Feuling, Superintendent Carson City School District (speaker)</p>	<p>Dear President Ortiz and Members of the State Board of Education:</p> <p>The Nevada Association of School Superintendents wishes to express our deep concern with the development of state-wide regulations concerning school start times. While we acknowledge the importance of student sleep and wellness research, we firmly believe that decisions regarding school start times should lie within the purview of local districts, considering their unique needs and the communities they serve.</p> <p>Numerous operational constraints affect the time at which schools start in the morning, including the length of the instructional day, availability of transportation, collective bargaining agreements, walk-zone sizes, and extracurricular and athletics scheduling. Without additional funds to address these operational challenges, mandated changes to school start times will lead to inefficiencies that negatively impact students.</p> <p>Moreover, altering school start times has a significant ripple effect on the entire community, disrupting morning routines for students and parents, equitable access to before and after school programming, student safety during travel, and students' ability to participate in after-school employment.</p> <p>Stakeholders, especially families and community members must be actively involved in these discussions, which must occur prior to any action by the board, to ensure comprehensive input</p>

	<p>and a better understanding of the implications associated with such a drastic decision. To achieve this, we urge intentional efforts to engage diverse voices throughout the state on this issue.</p> <p>Furthermore, there is a legitimate question as to whether the State Board of Education has the authority to regulate school start times. The broad interpretation of NRS 385.075 and 385.080 appears to overlook the legislative intent of granting local school districts control over public education, as explicitly stated in NRS 385.005:</p> <p><i>"The Legislature reaffirms its intent that public education in the State of Nevada is essentially a matter for local control by local school districts. The provisions in this title are intended to reserve to the boards of trustees of local school districts within the state such rights and powers as are necessary to maintain control of the education of the children within their respective districts. These rights and powers may only be limited by other specific provisions of the law."</i></p> <p>Given Nevada's diverse cultural and geographical landscape, decisions regarding school start times should be grounded in the law, local realities, and available resources.</p> <p>We are grateful for the opportunity to engage with the Board on this matter and sincerely hope that school start times remain under the discretion of local school districts, guided by the informed judgment of the Board of School Trustees of the affected districts.</p> <p>Thank you for your attention to this critical issue, and we are eager to collaborate further on finding the best solutions for our students and communities.</p> <p>Sincerely, Pam Teel, President Nevada Association of School Superintendents</p>
<p>Jan Giles ESEA President</p>	<p>Dear President Ortiz and Members of the State Board of Education,</p> <p>The Education Support Employees Association (ESEA) represents 13,000 support professionals at the Clark County School District (CCSD). We have concerns regarding this new school start time regulation.</p> <p>ESEA believes that the board should take additional time to address areas of concern for students, parents, the community and CCSD employees. We believe that the regulation's intention is to support student learning but that the current requirements being considered will have adverse effects for all.</p> <p>This board has a responsibility to properly do its due diligence prior to approving any new regulation. It seems irresponsible to impose this unfunded mandate especially without knowing the impact it will have.</p> <p>Here are some we'd ask you to consider:</p> <ul style="list-style-type: none"> • o Many young elementary students will be required to be at bus stops during times of morning darkness, this seems like an added safety issue. • o High School students could end up walking 5 miles to school and will need to leave earlier, which negates the later start time. Some students will choose to just not attend it if

	<p>comes down to walking 5 miles, which will cause a drop in graduation rates, again negating the later start time.</p> <ul style="list-style-type: none"> • o Start times are also family issues, many families regularly rely on older children to care for younger children after school, and this regulation turns this option upside down. This will force added after school expenses to already tight family budgets. • o This will interfere and cause a hardship for parents that drop off students before work. • o The lack of before and after school programs for the students and parents is not being addressed. Currently CCSD has a Safekey program at elementary schools, it is not free and it fills up quickly. What coordination is being done with onsite before and after care programs to assure they can handle the added stress of this regulation? • o The later end time will interfere with students that work after school or are involved in sports. <p>This regulation also puts added expenses to the school district, at a time when school districts must be focused on staffing. All school districts throughout Nevada are short staffed, additional resources need to be moved to training, hiring and retaining staff. School starting times are not a priority that should be taken on at this time.</p> <p>These are just some of the many possible issues. ESEA proposes that the board move this to additional committee work to answer the wide range of concerns that exist before any regulation is approved for start times.</p> <p>Thank you, Jan Giles</p>
<p>Gideon Slothower, Student</p>	<p>To Whom it may Concern,</p> <p>I am a student at Spring Creek High School. Recently, our school district changed its schedule to a 4-day week, rather than our previous 5-day week. The change has been hard on nearly each student. As a senior, I am afforded the privilege of having many electives. I have chosen to take two AP classes this year and 2 other academic classes. With this new schedule, I am being shuffled from class to class each day. The days are long, and the classes cannot afford to give any slack. Having to go straight to work after school, I find myself having barely enough time to do my homework. I have precious little time to spend with my family. By the time the weekend rolls around I am exhausted. My story is just one of many. Many students are struggling just as much as, if not more than I am.</p> <p>When I was informed that we may be increasing the time we have at school <i>and pushing it back to 8:00, rather than our school's 7:15, I, along with my class, was mortified.</i> I am strongly against this proposal, and my fellow students are as well. Our school, and by extension, our school district, is already under a great deal of strain. Please, do not exacerbate our struggle.</p> <p>We cannot afford to go home at 4:30. We cannot afford to start our day 45 minutes later. We cannot afford to increase the load we already have. We beg you to reexamine your disposition towards this legislature. The students of Spring Creek High School are exhausted. We are working our hardest just to stay afloat. We implore you to think of the needs of not just Clark County, but of the whole state as well. I have responsibilities at home to attend to. I have a job that I cannot afford to lose. I have too little time for homework as it is. My peers have the same responsibility!</p>

	<p>Please, hear us. We simply cannot handle a heavier burden. We will suffer under this new legislature. Our grades will suffer. Our homes will suffer. Please, before you vote, consider the consequences this will have for others. We humbly plead with you to contemplate voting in the negative.</p> <p>Thank you, Gideon Lee Slothower, representing students of Spring Creek High School</p>
<p>Afton Sampson, Student</p>	<p>Dear Members of the Nevada State Board of Education, Please, do not mandate an 8 a.m. start time for High School.</p> <p>I am a Spring Creek High School Junior, and within the past 30 minutes I have been informed of a decision that you are in consideration for that will be voted on tonight. Why have I not been informed of this more thoroughly?</p> <p>Why have my fellow students not been informed of this? Why do we have to find out as you are making the decision? Why, as the students you will be affecting, are we being informed of this last?</p> <p>As students you will be making a decision for, why are we not included, or given a chance to give our opinions, in that matter? Who is being included in the making of this decision at hand? You are people of this state of whom I highly respect, as you are members of the board that determines the education I have access to. However, you are about to vote on a decision that will directly affect not just my education, but also my home life, social life, extracurricular life, and work life. This is not just a vote to settle a school in complaint, but also students across the entire state.</p> <p>I currently have a four-day school week. I begin school at 7:15 a.m., and end school at 3:00 p.m. I then have extracurricular activities that extend my day to end at anywhere from 5:30 to 6:30. In addition to this, I have appointments that extend to about 8:30. By the time I return home, I still have anywhere from 3-6 hours of homework, in addition to dinner, physical needs, and time with my family.</p> <p>This is not a condition of bad time management, but the reality of my very filled day. Is it not sad that I am one of the students who needs to sacrifice sleep for school, family for school, and much more? To continue upon this explanation, I am one of the students who does not currently have a job or participate in sports.</p> <p>If you were to implement this decision, I would be returning home at an even later time. I would not have enough time to do the things necessary for me to be a human being. As it is, I need to fit hours of homework into my days, even if there is physically no way to do so. In school, I have to spend every minute of every second studying in class, during passing periods, and during lunch.</p> <p>Please, just think about your decision. Yes, one school will be happy, but this does not fit every school, or every student. An 8 a.m. starting time will not be beneficial to all, especially at this school. Consider this, and the emails of my classmates.</p> <p>Try to listen to the students of whom you will affect, because the decisions that you are now working to put into effect may not be as beneficial as you think.</p> <p>Thank you for your consideration, Afton Sampson 11th Grade Spring Creek High School</p>

<p>George Thomas, Student</p>	<p>I am an athlete who runs cross-country for the SpringCreek Highschool. My school has been doing 4 day 7:15-3:00 with cross country practice after that so I usually get home around 5:30. Starting School at 8:00 will give me and many of my friends less time for anything we want to do outside school. We already stay up until around 11:00 every night and adding 45 minutes will not help. Please do not pass this to start school at 8:00.</p>
<p>Adley Baldwin, Student</p>	<p>Dear school board members,</p> <p>I am writing this email in regards to the changing times for our school schedule. I wish to not have school start at 8 am and end at 4:30 pm or 5 pm. These times will conflict with my sports schedule which is already very late due to the change in times for the 4 day school week. We should not have times change just because one school/county doesn't like the times. Cross country practice ends at about five and right after I have dinner, with the times being changed to as late as 4:30 or 5 pm it will greatly affect my day. Also with clubs and organizations we would be getting home as late as 7-9 pm which is not substantial</p>
<p>Emma Knight</p>	<p>Dear Nevada State Board of Education,</p> <p>my name is Emma Knight and I am a junior at Spring Creek High School. I heard the state board of education is trying to make school start at 8am this year and I have some opinions to share with you, from a students perspective. With the four day school week I am already very overwhelmed with trying to balance school, work, sports, and other extracurricular activities. My day starts at 4:50am every morning since my bus comes at 6:15 and that is my only mode of transportation to school. This gives just enough time to get ready to go to school, and then I catch the bus.</p> <p>While at school I cram in seven classes, with their own given amount of homework and tests for each. After school is finished, I go to practice for about an hour and afterwards I go to work. Given, if school did start at 8am, I would have the benefit of sleeping in for an hour. But school getting out later would affect my schedule. More than likely, I would end up quitting cheer and track because it is not possible for me to stay any later after school because of work and my home life. Please reconsider your choice as it would be affecting lots of students' lives.</p>
<p>Emily Clark, Student</p>	<p>Dear Members of the Nevada State Board of Education,</p> <p>I would like to address some of the cons of the voting on starting school at eight o'clock in the morning. For starters I would like to add that I am president of the Spring Creek High School FBLA, this change is a downside for all clubs, and that includes mine. This is effective towards clubs because of the general and officer meetings being held after school, getting out of school at four o'clock is a struggle for those who go to work and get off late to get hours in, for others who have two to three hour practices after school, and general family time for all of us. Since being newly changed to the four day school week, Fridays aren't being skipped from those in sports, which has become a plus for all of us, including teachers who deal with constant make-up work. As a leader, I've been taught and told "Leaders start their day early to achieve their dreams while others are sleeping." Starting later doesn't give an advantage to</p>

	<p>really anyone. To give an example for a single student's life, here is mine. Making it to school at seven forty five, attending my classes and collecting my homework and then having a meeting afterschool that lasts an hour and a half, then making it to work by six, not getting off until ten thirty and making it home by ten fifty five, then having to do homework until eleven thirty and lastly making it to bed by eleven fifty almost twelve and having to repeat that five times a week assuming we would then go back to school five days a week. That is exhausting for every highschool student and makes a struggle out of a personal life.</p> <p>What change does this make for our elementary schools? Along with those of us with parents who work at the mines? Time is real and does exist for those of us who have to use it wisely. Our school district is so positive and pro on mental health, and being flooded constantly is a downer. Please reconsider this decision and take a look at all of our personal lives and how this individually affects all of us one by one.</p> <p>Sincerely, Emily Clark at Spring Creek High School</p>
<p>Johanna Cox, Student</p>	<p>Dear Members of the Nevada State Board of Education,</p> <p>Hello, my name is Johannah Cox. I am a senior at Spring Creek High School this year and getting out of school at 4pm or 4:30pm, would not work. I am involved in SkillsUSA and we have after school meetings and I am involved in National Honors Society and we have meetings after school for that organization too. Nobody in Spring Creek has an issue with starting school at 7:15am, we would have an issue, however, with getting out of school after 3pm. Sports and other after school activities would end at 7pm or 8pm with this schedule and that leaves hardly any time for homework, family time, work, or sleep. Our schedule is fine how it is now, please don't change it. Please don't ruin my senior year. It's my last year of high school and I don't want it to be awful.</p> <p>Thank you for reading this email and I hope you all vote no on this.</p> <p>Sincerely, Johannah Cox, senior at Spring Creek High School</p>
<p>Jase Hildreth</p>	<p>I am emailing to say that if this plan goes through to end school later, then it will be impossible to do sports or extracurricular activities after school for kids who actually participate in this stuff.</p> <p>There is no need to start later because we have always started at the same time year after year here at SCHS and I would know because I'm a senior, please do not change the schedule and make everyone's lives harder.</p> <p>Sincerely, Jase Hildreth</p>
<p>Journey Reynolds</p>	<p>Please do not make school start at 8 am, i'm fine with not sleeping in and being able to go home and take a nap before dinner, i'm in FBLA and when we have meetings I don't get home until 6, and now with this later schedule I will get home at 8. I am normally in bed at that time!!! Please voice my concern in your votes this evening.</p>

<p>Enrique Morales</p>	<p>HI, please do not change the school timing. I have no issue getting up and most of us will have to for our future careers anyways. Ending school later does not work for anyone and takes away from family spending time, sports, and organizations such as my FBLA.</p>
<p>Lana Morse, Student</p>	<p>Dear Nevada State Board of Education and School Board Members.</p> <p>This is Lana Morse from Spring Creek High School, Spring Creek. Speaking of all students, at least in Elko County, we would not be very fond of starting school at 8:00, if this is a real idea you're planning to pass, especially if school is getting out at 4:00 or later. A lot of students here are very involved in sports and after-school extracurricular activities. They would be swamped with work and are tired all the time on a normal school day and even the weekend, and now they would be even more busy all the time. Also, think of the teachers, who are still struggling with the school hours as it is, would struggle even more. The state of Nevada, along with the rest of the country, is currently going through a teacher-shortage crisis. The time of the school day could potentially increase this problem. Thanks for your concern and for listening to mine.</p> <p>Sincerely, Lana Morse, Spring Creek High School.</p>
<p>Lorie Heckman, Parent</p>	<p>To whom it may concern,</p> <p>I am writing to you today as a parent of a High School student. I am opposed to the state regulation of school start times. This should only be determined by the local school districts as they understand the needs of the families they serve. Requiring school to start after 8 a.m. will have a host of detrimental consequences to students including, sports, jobs, and other afterschool activities.</p> <p>It will also negatively impact elementary and middle schools because of transportation. Most Nevada schools are in rural areas and you are basing your decision only on what is best for the schools located within cities because, in rural areas, we do not have the ability for children to safely walk to and from school, especially in the winter time when it is dark and the roads are filled with ice and snow.</p> <p>Please stay out of decisions that should be made locally because what you are attempting to do does not work well for all Nevada students.</p> <p>Sincerely,</p> <p>Lorie Heckman Spring Creek, NV</p>

<p>Cindy Plummer</p>	<p>Please vote no on regulating School Start Time state wide (Agenda Item 7). Nevada has unique demographics throughout the state and this would cause hardships in a plethora of factors to various communities and families.</p> <p>It is also my opinion that this topic should be controlled locally with each District's logistics taken into consideration.</p> <p>Cindy Plummer #voteno</p>
<p>Katherine Davis</p>	<p>Good evening,</p> <p>It has come to my attention that the Nevada Dept of Ed is considering changing the start times of High Schoolers to be no earlier than 8:00 am.</p> <p>While this change may be the best for the students in other areas of the state, I feel this is an extreme detriment to High Schoolers in NE Nevada.</p> <p>Elko County School District recently approved a 4-Day school week, which has caused students to be released from classes later than previous years. In our smaller community the availability of gyms, fields, etc is extremely limited, especially for those sports that practice and play outside.</p> <p>Making our students start even later in the day will further impact any extracurricular activities, jobs, etc. This also could interfere with families of elementary students, as they will be arriving home earlier than older siblings, leaving them unattended. Locally this will also impact and change elementary school times as we are limited on buses, students may be walking to and/or home from school before and after dark depending on the changes needed to accommodate all schools and bus schedules.</p> <p>I feel that each individual districts and communities have different needs and should be able to determine if this is something that would be beneficial in their area.</p> <p>Thank you for your time.</p> <p>Katherine Davis.</p>
<p>Lillian Horsley, Student</p>	<p>Dear Sir or Madame:</p> <p>I was reading an article in my towns newspaper, The Elko Daily Freepress, about changing our start time to 8am. My school, Adobe Middle School, starts at 7:40am. Consequently, some of my friends who ride the bus are up early to make it to the bus stop at 6:30. My bus gets to my stop at 7:20 but the official schedule says 7:16. Therefore, I am up at 6:20 because if I miss my bus I don't have anyone who can take me to school. Theoretically, if my bus were to pick me up fifteen minutes before school started at about 7:45 I would be at my bus stop for around forty minutes because my mom has to be at work at 7:10.</p> <p>My school ends at 3:25pm. Clubs have meetings until 4:15 and sports have practice until about 5:15. Right now I am getting home at about 4:30 on nights I ride the bus and 4:45 on nights I have clubs. One of my friends rides the bus home and arrives at 4:30 but when she stays for track she doesn't get home until 6:30. If you change it so that we start at eight that pushes our start time back twenty minutes which would mean that hypothetically we would get done at 3:45. If teachers still end clubs at 4:15 and do what they have been doing and keep start times at five minutes after the bell rings our clubs will go from 3:50 to 4:15 which is only twenty-five minutes. You can't paint a picture in art club or run a scene in drama club in only twenty-five minutes. Those things take time. However, if our teachers keep our clubs at the regular forty-five minute length our clubs won't end until 4:35 which gets most of us home</p>

around 5 or 5:30. One of my friends, in Ryndon, goes to the Elko High School which starts at 7:30. It takes her an hour from the time she gets on her bus to get to school and that doesn't count the fifteen minutes it takes her to get to the bus stop. If you push their start time back to 8 they won't get done until 4:10. She won't get off her bus until 5:10 and she won't be home until 5:25. In the winter it gets dark at five. Kids that walk home will most likely be walking at least partly in the dark.

Also, one of the things mentioned in the article was how this would help us get more sleep. However, as the schedule is now, if I get home at 4:30 on a regular night and I eat, take a shower, do my homework, and watch some TV I don't get in bed until 8:30 or nine. Now push that back twenty minutes and I'm not in bed until nine. What about the days you have to study for a test? If you are reviewing some stuff and are up until ten because you didn't even get home until five you are going to be tired.

I used random sampling to ask fifteen kids this question.

Have you heard that the Nevada State Board of Education is thinking of pushing our start time back to 8am?

I had two kids say they had heard that and the other thirteen hadn't.

I then asked 'How would you feel about that?'

All fifteen said that sounded great and I agree with them.

One said it would mean getting up later which would be good.

Then I followed up with 'How would you feel if I told you that to start at eight you wouldn't get out of school until 3:45?'

Of those fifteen, fourteen said that sounded terrible and one said that was fine and then they thought about it and realized that as it is now archery doesn't end until 5:30. They then changed their mind. All fifteen ultimately said no.

For most the answer 'no' came for this reason they wouldn't get home until later. Of the kids I talked to the times they would get home, on days they went straight home, ranged from as early as 4:30 to as late as 6:15.

I think that you are doing what you feel is right for us, the students, but you haven't asked us what we thought. If you want to know we will happily tell you because even though people keep saying that kids aren't involved that doesn't mean we don't want to be, it just means we haven't found a cause or we haven't found a way to help that cause. This is my cause and the thing about it is it barely affects me. I homeschool and only go to regular school for electives. If this law affects me too much I can just drop regular school. The other 755 kids, just at my school, can't. Except they can. Not all of them but I know for a fact that I am not the only homeschooler some come up for electives others core classes but it doesn't matter. According to the ones I talked to if the school time changes they can't come. So maybe think about that before you pass this law. Adobe can't be the only school that has homeschoolers and it isn't. That girl that lives in Ryndon goes to the high school for three classes and homeschools for the rest. Lots of kids do part time schooling, what happens if they all drop out of school to do full time homeschooling? We do part time because we want to, not because we have to. The kids that can't switch to homeschooling, the ones who actually do full time school, are going to have a hard time with this law.

This is ultimately your decision, but maybe you could send out a poll with all the information and let the kids and the parents and the teachers help you.

Sincerely,
Lillian Horsley, 8th Grade, Adobe Middle School, Abeka Academy (homeschool)

Jackson Chamberlain,
Student

Dear Nevada Board of Education,

I am writing this letter as part of the Reno High School civics engagement program, and I wanted to talk about school start times.

As of now, Reno High School begins at 7:40 A.M. To my knowledge, the other schools in the area start at a similar time as well. It is my personal opinion that schools should start at least an hour later. Not only speaking from my own experience and the experiences of many others, but also from the knowledge we have of the developing brain. According to an article written by Julie Wootton-Greener for the Las Vegas Review on September 6th, 2023, draft language has already been approved for new regulations on school start times, requiring that no high school start earlier than 8 A.M. . Though this would be a change for the better, I think more could still be done to make sure students don't show up to school deprived of sleep.

According to an analysis done by the CDC of the 2015 national and state Youth Risk Behavior Surveys, about 72.7% of high school age students did not get enough sleep on school nights. When we compare high school start times to the average amount of sleep that is recommended for that age range it's easy to see why. The National Center for Education statistics did a poll of high schools across the county during the 2017-2018 school year, and found that the average start time for public high schools was 8 A.M. Further, the CDC recommends kids age 13-18 get 8-10 hours of sleep per 24 hours. If we account for the time it takes students not only to get ready for school, but also to commute, the best bedtime for students in this age range would be around 9-11 P.M. .

Considering homework, as well as the fact that many students work jobs in addition to attending school, this time frame is somewhat unrealistic. Further In my personal experience, most students I've interacted with do not go to bed at these times. I can't speak on behalf of everyone, but I do struggle with drowsiness on a pretty regular basis. I believe that student performance would greatly increase if we allowed them more time to rest. It is for all these reasons I encourage you to at least consider moving the start of school to a later time. Thank you.

Sincerely, Jackson Chamberlain.

Public Comment for the State Board of Education meeting 10/4/23, Agenda Item # 9 Clark County School District (CCSD) Reorganization Times

(Other than line spacing, font size, or font color, this have not been edited.)

Ed Gonzalez

My name is Ed Gonzalez and I am submitting public comment on item 9 pertaining to the training for the CCSD Reorganization.

While this document addresses the basics of how the reorganization works it does leave out some important information.

One of the things principals are being asked to address along with their regular duties of education students is to spend the carryover dollars that have accumulated over the years due to the current teacher shortage crisis.

Many principals have ideas on how they would like to spend those dollars in light of the legislature passing legislation that will ultimately take these dollars from schools. Many of these dollars are in our most at-risk communities.

Some principals would like to use the carryover dollars at their school to expand central office services to their school to help improve student achievement.

It would require some responsibilities to be passed down to school and a service level agreement created to expand services.

Nowhere in the CCSD training documents on the Reorganization is that processed discussed or how a principal or school precinct could make such a request.

As this body is aware, no service level agreements currently exists as the were repeal almost two years ago.

While I may have further concerns after a more careful reading, I do appreciate the fact that a document like this exist.

However, additional training outside this document is needed to ensure that principals and schools can have a better understand about what the can do under AB469.

Thank you,
Ed Gonzalez

Public Comment for the State Board of Education meeting 10/4/23, Agenda Item #10 Read by Grade 3 and MAP Assessment Data

(Other than line spacing, font size, or font color, these have not been edited.)

Kat Mehocic

Dear State Board of Education Members,
I am highly concerned regarding the newly reinstated plan to retain students who are not proficient in reading by 3rd grade, especially when the current definition of proficient is scoring above the 40th percentile on MAP reading testing.
Although MAP presents its own classifications of test scores, these classifications are completely arbitrary. Statistically, scores between the 16th and 84th percentile are average. Choosing a cut score of the 40th percentile means we will be retaining a number of perfectly average students, many of whom likely earn "A" grades in reading. Not to mention, we would be retaining nearly half of all third graders across the district.
I highly encourage the board to change the proficiency cut score to below the 16th percentile so that we are not retaining average students who would not benefit from retention.
Thank you,
Kat Mehocic

Amie Palmira,
Coordinator,
Psychological
Services,
Clark County
School District

Good afternoon,
My name is Amie Palmira and I am a Coordinator for Psychological Services in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause harm to our students.
As a school psychologist, I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. The idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a different score depending on what scale the assessment used -- whether it be a standard score, scaled score, T-score, etc.
For instance, a score at the 50th percentile could be reported as a standard score of 100 or a T-score of 50. Both of these scores are considered "average" but are reported on a different scales.
It was presented that students who score at the 40th percentile on MAPS would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned, "average" or "proficient" on these assessments is clearly reported on different scales of measurement. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"
My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English

Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.

I urge the board to reconsider the cut-score outlined in the current law.

Thank you for your time,
 Amie Palmira, M.S., NCSP (she/her)
 Coordinator IV - Psychological Services, Region 3 East
 Dr. Beth Howe Center

Erandy Benavides

Dear State Board of Education Members:
 Sadly, AB400 overturned all of the good work that Assemblyman Tyrone Thompson accomplished before his passing to remove the retention piece from Read by Grade 3. Everyone who has studied the enormous amount of research on this topic knows that retention unduly penalizes students of color and students with primary languages other than English; it is highly correlated with violence and school dropout rates; and moreover, retention actually hurts students' academic performance in the long run (see Hattie's Visible Learning meta-analysis data).

Even so, as you the State Board are charged with setting a cut score, please consider the average range within norm-referenced assessments (e.g., MAP), along with the at-risk and severely at-risk ranges.

The average range is: the 16th to 84th percentiles.
 The at-risk range is: the 6th to 15th percentiles.
 And the severely at-risk range is the 1st to 5th percentiles.

Certainly, students scoring in the average range, starting at the 16th percentile, should never be retained.

While retentions may sacrifice students for what we as adults should be doing to help them, please seriously consider using your voice to speak up for wisdom in this decision.

Thank you.
 Erandy Benavides, NCSP

Wanyun Kelley, Psychologist, Clark County School District

My name is Wanyun Kelley, a school psychologist at Clark County School District. I am writing in reference to READ BY GRADE 3 AND MAP ASSESSMENT DATA agenda item: to retain students whose MAP scores are below 40th percentile. The cut-off score for the 40th percentile is not reasonable nor supported by the statistics.

Statistically, any score between the 16th percentile and the 84th percentile is considered Average. If we are to use 40th percentile as a cut-off score, we are in danger of retaining students who are actually AVERAGE.

In addition, as a school psychologist and a former teacher, we NEVER use one data point to make any decisions. Using one MAP score of the 40th percentile to determine students' retention is detrimental to students' academic progress, and social-emotional well being. When setting a cut-off score for retention, please consider the Average range within the norm-referenced assessments such as MAP. The Average range is 16th to 18th percentile. Students scoring in the average range, starting at the 16th percentile, should never be retained.

I urge the board to reconsider the cut-score regarding retention.
Sincerely,
Wanyun Kelley, M.Ed, Ed.S, NCSP
School Psychologist
Clark County School District

Erin Burton,
Psychologist,
Clark County
School District

Good afternoon,
My name is Erin Burton and I am a school psychologist with the Clark County School District. I would like to address the considerations being made on having a Mandatory Retention based on one assessment, the MAPs assessment. Basing a life impacting event, such as grade retention, on a single assessment is not only faulty logic, it also can have long lasting negative effects. I am regularly part of teams that make special education eligibility decisions for students and we know that we need to consider many data points, sources of information, and multiple factors. When looking at MAPs assessments the scores reported are based on national norms, that did not include Nevada in it's norming sample. National norms are based on a bell curve model, meaning that 68 percent of the population will fall between the 16th to 84th percentile range, being classified as "within the average range." The publisher's of the MAPs assessment have even stated that scores at the 20th percentile and above are considered within the average range. I do agree that students identified as being "at-risk" should receive attention, in the form of targeted interventions. Addressing the areas of difficulty with research-based, small group interventions, is far more logical than making a broad statement of Mandatory Retention. The National Association of School Psychologists has published research that does not support the effectiveness of grade retention. The main points include:
Given the limitations and potential negative impact of grade retention, as well as the considerable evidence that targeted interventions help struggling students improve their academic performance (Peguero et al., 2018), schools should consider alternatives to grade retention for students who are struggling academically. Specifically, school teams should consider the following before retaining a student.

- There is wide research support that retention is not an effective strategy to address academic deficits (e.g., Andrew, 2014; Fruehwirth et al., 2016; Hwang & Cappella, 2019; Jimerson, 2001).
- Under typical circumstances, grade retention is not recommended except in very rare situations when a student has missed a large number of school days (NASP, 2011).
- Students whose performance is substantially below that of grade level peers need a culturally responsive, intensive individualized intervention plan with frequent progress monitoring (Stevenson & Reed, 2017). This plan should include involvement of specialists and relevant related services providers as needed.
- Families should have input when retention is being considered for a student.
- A single assessment score (e.g., year-end standardized assessment) is not sufficient in making this determination, particularly following a period of disrupted educational experiences. Multiple sources of data should be considered.

	<ul style="list-style-type: none"> • Decisions to retain should not simply lead to repeating the same curriculum for a second time. Retained students will need intensive intervention support that goes beyond repetition of material. <p>I would like to add that within the Clark County School District, many of our students have faced disrupted educational experiences. With staff shortages impacting every school building it is naive to think that all students are getting a quality educational experience. To hold them, the individual students, accountable for the lack of instruction is unethical, immoral, and inequitable.</p> <p>It is my recommendation that mandatory retention based on a single assessment be deemed inappropriate and not included in educational practice or law.</p> <p>Erin Burton, NCSP School Psychologist Richard Bryan ES William Lummis ES Indian Springs Schools</p>
<p>Leticia Marrujo, School Psychologist, Crestwood ES</p>	<p>Hello Respected Board Members: Please consider the number of years it takes to develop CALPS, before instituting draconian policies that may result in repressive outcomes across ethnic groups. Thank you for your time. Leticia Marrujo, M.S., Ed. School Psychologist <i>Crestwood ES</i></p>
<p>Douglas Landaverde, School Psychologist, Clark County School District</p>	<p>My name is Douglas Landaverde and I am a school psychologist in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause undo harm to our students. Additionally, it is important to note that the standardization of MAPS did not include Nevada in their norming sample. Therefore, any score from these measures are significantly confounded and would be highly unethical to use them as indicated in the AB 400 Ready by Grade 3 Law. Additional context about scores follows in the next paragraphs.</p> <p>As a school psychologist, I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. The idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a different score depending on what scale the assessment used -- whether it be a standard score, scaled score, T-score, etc. For instance, a score at the 50th percentile could be reported</p>

as a standard score of 100 or a T-score of 50. Both of these scores are considered "average" but are reported on a different scales.

It was presented that students who score at the 40th percentile on MAPS would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned, "average" or "proficient" on these assessments is clearly reported on different scales of measurement. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.

I urge the board to reconsider the cut-score outlined in the current law. I also urge our K-12 leaders to evaluate the conventional education system in efforts to meet the current needs of our children.

Sincerely,
Douglas Landaverde

PD. Please note the research compiled by the National Association of School Psychologists (NASP) regarding the Impact of Retention on Student Outcome

Impact of Retention on Student Outcomes

Retention is a costly intervention with little to no evidence of improving long-term academic outcomes. The majority of studies conducted over the past four decades on the effectiveness of grade retention fail to support its efficacy in remediating academic deficits (e.g., Andrew, 2014; Fruehwirth et al., 2016; Hwang & Cappella, 2019; Jimerson, 2001). In fact, repeating a grade prior to beginning high school increases the risk that a student will drop out even when other variables, including overall academic achievement and disciplinary records, are considered (Hughes et al., 2018; Jacob & Lefgren, 2009; Stearns et al., 2016). Moreover, retained students from minoritized backgrounds drop out at disproportionately higher rates compared with their White peers (Hughes et al., 2018).

There is also evidence of significant racial disparities in retention rates. Students of color are at greater risk of being retained, regardless of school characteristics, such as availability of school resources or whether or not the school is in an urban, suburban, or rural community (Peguero et al., 2018). Retention should not be used to remedy the lack of school-based supports. This ineffective strategy could compound these losses rather than support student learning and long-term academic outcomes.

Despite the negative outcomes associated with retention, many states have mandatory retention laws. These mandates could result in hundreds of thousands of students being retained, causing untold academic and social consequences for students. Additionally, these mandates will create larger class sizes that could imperil districts for years to come. We

	<p>strongly urge states to waive these mandatory retention requirements and instead focus efforts on implementing appropriate evidence-based interventions to address academic needs.</p> <p>Given the limitations and potential negative impact of grade retention, as well as the considerable evidence that targeted interventions help struggling students improve their academic performance (Peguero et al., 2018), schools should consider alternatives to grade retention for students who are struggling academically. Specifically, school teams should consider the following before retaining a student.</p> <ul style="list-style-type: none"> • There is wide research support that retention is not an effective strategy to address academic deficits (e.g., Andrew, 2014; Fruehwirth et al., 2016; Hwang & Cappella, 2019; Jimerson, 2001). • Under typical circumstances, grade retention is not recommended except in very rare situations when a student has missed a large number of school days (NASP, 2011). • Students whose performance is substantially below that of grade level peers need a culturally responsive, intensive individualized intervention plan with frequent progress monitoring (Stevenson & Reed, 2017). This plan should include involvement of specialists and relevant related services providers as needed. • Families should have input when retention is being considered for a student. • A single assessment score (e.g., year-end standardized assessment) is not sufficient in making this determination, particularly following a period of disrupted educational experiences. Multiple sources of data should be considered. • Decisions to retain should not simply lead to repeating the same curriculum for a second time. Retained students will need intensive intervention support that goes beyond repetition of material. <p>Douglas Landaverde, NCSP Bilingual School Psychologist Roundy Elementary Wynn Elementary</p>
<p>Katie Sorrentino, School Psychologist, Clark County School District</p>	<p>Dear Board Members,</p> <p>My name is Katie Sorrentino, and I have been a school psychologist in Clark County School District for almost thirty years. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices, and would cause undo harm to our students.</p> <p>In the course of my work I regularly reference percentiles and other similar statistical data when interpreting assessment results. Score ranges indicating average, or proficient, performance are those that fall between the 16th to 84th percentiles. This is universally and objectively accepted in the fields of research, education, and psychology.</p> <p>Therefore, identifying students at or below the 40th percentile as “at-risk”, or in need of a significantly life altering decision such as retention, is well outside accepted practice and illogical with regards to statistical and data-based decision making.</p>

	<p>There is also an issue with over-identifying students based on this unsupported approach to quantitative statistics and data analysis, which is the very real danger of disproportionately retaining student subgroups including our Black, ELL, Hispanic/Latino, and IEP students. While perhaps unintentional, indisputable facts indicate this is the reality and would perpetuate a system of discrimination in our schools. I urge the board to reconsider the cut-score outlined in the current law.</p> <p>Thank you for your time, Katie Sorrentino School Psychologist</p>
<p>Leticia Marrujo, School Psychologist</p>	<p>Hello Respected Board Members: As you develop the criteria please keep in mind that average performance bands on the MAP tests are between the 16th and 84th percentiles. <i>Northwest Evaluation Association (NWEA) suggests the 21st percentile as “low average,” but is still within the average performance band.</i> Our special education evaluation reports summarize these benchmarks and indicate the student's performance level. I am struggling with the idea of informing parents that their child is performing within average levels, when compared to peers nationally, in spite of having been retained. Thank you for your time. Leticia Marrujo, M.S., Ed. School Psychologist</p>
<p>Donna Seals</p>	<p>Why are we waiting 5 years before we restart this? So, current 3rd grade students will be starting high school and unable to read?</p>
<p>Andrea Davis, School Psychologist Clark County School District</p>	<p>To Whom It May Concern,</p> <p>I am a school psychologist who has been working in CCSD since 2001. I would like to weigh in on the requirement for retention that is being considered as AB400. There are numerous reasons that I believe this is a disastrous bill. For the first reason, the cutoff score of the 40th percentile includes a range of scores that still fall within the average range,. according to statistics. Percentiles and standard scores are based on a normal distribution, on a bell curve, that indicates that average scores are from the 25th to the 75th percentile, and low average scores are above the 16th percentile. This bill would cause many students who are performing within the average range to be held back. In addition, this bill would have the effect of increasing retention for particular subgroups of students that have historically underperformed on these standardized assessments, such as Hispanic, African American , English Language Learners and students with IEPs. I urge you to reconsider the passing of this bill, and instead look for ways to increase student and parent engagement in the learning process.</p> <p>Thank you for your consideration, Sincerely, Andrea Davis Andrea Davis, MS.Ed, NCSP School Psychologist</p>

<p>Anne Sikra, School Psychologist, Clark County School District</p>	<p><i>Hello,</i> <i>My name is Anne Sikra and I am a school psychologist in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement makes no sense mathematically. If this requirement were followed, 40% of the students in the state would be retained.</i></p> <p>Anne Sikra School Psychologist CP Squires Elementary School Mountain View Elementary School</p>
<p>Andrea J. Walsh, Nationally Certified School Psychologist, Clark County School District</p> <p>National Association of School Psychologists, Board of Directors, Western Delegate Representative, Nevada Delegate</p>	<p>Good afternoon, My name is Andrea Walsh and I am a Nationally Certified School Psychologist in the Clark County School District. I am also the Nevada Delegate for the National Association of School Psychologists (NASP) and I sit on the Executive Board of Directors for NASP. I am currently in my 28th year with CCSD and I have seen educational laws come and go, but I have never seen anything with more potential to harm students than the Read by Grade 3 law.</p> <p>I am writing today to comment on the Read by Grade 3 and MAP Assessment Data agenda item.</p> <p>I implore you to reconsider the current requirement for students to be above the 40th percentile in MAPS, or be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause great harm to our students. As a school psychologist, it is very difficult to explain to parents and school teams that while the cut-score for the mandatory retention in this law is the 40th percentile, the 40th percentile is perfectly average! I am not sure if the law makers that came up with this cut-score do not know the difference between percentage and percentile, but those two things are not the same. The 40th percentile cut-score is not supported by the normal distribution of scores on any given assessment. Statistically, the 16th to 84th percentile is considered the average range. Regardless of whether standard scores, T-scores, scaled scores, etc. are used--- on every measure the 16th to 84th percentile is considered average.</p> <p>If you allow the 40th percentile to be the cut-scores, do you understand that 40% of ALL third graders will have to be retained? That is how percentiles work. Everyone cannot be above the 40th percentile. Only 60% can be above the 40th percentile. Out of 100 students, 40 will <i>always</i> be at or below the 40th percentile. Out of 100,000 students, 40,000 will <i>always</i> be at or below the 40th percentile. The percentile does not indicate proficiency, it indicates where a student's score falls in comparison to their peers. They could all be non-proficient and you will still have 40% of students fall at or below the 40th percentile.</p> <p>Regarding retention-- research shows that retention rarely results in good outcomes for kids and should only be considered in rare cases. School teams know what to do with students who are struggling with proficiency-- and this law shows that lawmakers have no idea. Schools use MAP data to determine who needs additional intervention in reading or math. MAP has been good at alerting school teams of who needs intervention. And when students are not making adequate progress with intervention, that indicates that there is an issue. That issue will not be solved by retention. These students are referred to the multidisciplinary</p>

	<p>team (including the school psychologist) who then evaluate and determine the cause for low scores. Often, children with low scores have a disability impeding progress- and they have a right to special education services. For lawmakers that apparently do not understand the normal bell curve to pick a perfectly average score (the 40th percentile) to arbitrarily decide who is going to be retained is simply bad for kids.</p> <p>Finally, the NWEA presented data regarding the proficiencies of subgroups, including English Learners, Black and Hispanic/Latino and IEP demographics. These demographics chronically underperform on the MAPS assessment, which is extremely concerning in and of itself. Mandatory retention at the 40th percentile on MAPS would perpetuate the systematic racism that already adversely impacts these minoritized populations.</p> <p>I strongly encourage this Board to ask questions and seek understanding of how a cut-score of the 40th percentile will negatively impact 40% of Nevada's students. Reach out to the Director of Psychological Services with the Clark County School District-- our department would be thrilled to explain it.</p> <p>Please do the right thing for the students of Nevada. The Read by Grade 3 law and the cut-score outlined in the law is <i>not</i> good for kids.</p> <p>Kind regards, Andrea J. Walsh, Ed.S., NCSP (she/her) Nationally Certified School Psychologist Clark County School District National Association of School Psychologists Board of Directors Western Delegate Representative Nevada Delegate</p>
<p>Alayna Sacca, School Psychologist, Clark County School District</p>	<p>Hello,</p> <p>My name is Alayna Sacca and I am a school psychologist in the Clark County School District (CCSD). I am submitting this comment to address my vehement disagreement with the current requirement of AB400, which requires mandatory retention of 3rd grade students if they do not score at or above the 40th percentile on the MAP reading measure. Statistically speaking, this would cause students who fall within the average range (from the 16th to the 39th percentile) to be retained. Again, that means students who are performing within the AVERAGE range, would be retained.</p> <p>My work as a school psychologist often focuses on analyzing student performance in the form of percentiles, as well as understanding standard scores, scaled scores, and T-scores. For reference, the average range for percentiles is the 16th to 84th percentile. I have also attached two graphics of a bell curve below for further reference. Yes, the mean, which is the exact middle of the bell curve, is the 50th percentile. However, the average RANGE, where we expect approximately 68.2% of students to be performing, extends one standard deviation above and below the mean. This means that 68.2% of students are performing within the average range of the 16th to 84th percentile, and 15.86% of students fall below the average range between the 1st and 15th percentile.</p> <p>That all being said, the fact that the cut score for mandatory retention in AB400 is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is WELL within the average range, and it is HIGHLY inappropriate to retain students considered statistically average. As a wise colleague of mine stated, the question</p>

"Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

Further, I am quite concerned regarding how this arbitrary cut score will affect our minority populations such as English Language Learners, Hispanic/Latino students, Black/African American students, and students receiving special education. These demographics chronically underperform on the MAP assessments, and their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAP assessments would guarantee the continued systematic discrimination of these minority populations. I would be highly disappointed in and disheartened towards any Board perpetuating this inequality amongst our most vulnerable students.

I sincerely urge the Board to reconsider these practices as well as this arbitrary and inappropriate cut-score outlined by this Read by Grade 3 law.

Thank you for your time, consideration, and dedication to more positive student outcomes,
 Alayna Sacca, Ed.S., NCSP
 Bendorf ES)
 KO Knudson MS

Good morning

My name is Elizabeth Santos and I am a school psychologist in the Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause undue harm to our students. This idea that the 40th percentile should be a cut off score to retain kids is a completely manufactured number and therefore, ludicrous.

As a school psychologist who is well trained in the statistics and mathematics behind what is considered "average", I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. The theories and research that support the idea of "average" or "proficient" have concluded that there exists a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment and therefore not supported by science and research. The 40th percentile is well within the average range and our students should even be celebrated for obtaining anything within the average range. As a school psychologist, if I see a student with 40th percentile or even 30th percentile scores, I am not worried about that student at all and I can speak for my colleagues on this as well. Where the board got this number as their cut off is beyond me.

Another concern my colleagues and I have has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law. It does not take a lot of critical thought to understand that this 40th percentile cut off score will harm our students, set them back, and is overall a very bad idea. I understand that the board wants to increase student achievement, but this will not happen using ineffective methods such as this one. As a city with a large, diverse population, we need to take into consideration our English Language Learners, our economically

Elizabeth Santos,
 School Psychologist,
 Clark County School District

disadvantaged students, and our special education students who will now face even greater discrimination thanks to this cut off score. As a school psychologist, I have vowed to fight discrimination and advocate for the use of well-researched, empirical methods in education and that is why I needed to write this comment to the board. Reconsider this cut off score law as it is nothing more than an arbitrary number that causes more harm than good.

Thank you,
Elizabeth (Lisa) Santos, Ed.S, NCSP
School Psychologist
Clark County School District

Good afternoon,

My name is Varotta Johnson and I am a school psychologist in the Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause undue harm to our students.

As a school psychologist, I reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. The normative curve that I explain to my teams and parents indicates the the idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentiles. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a different score depending on what scale the assessment used -- whether it be a standard score, scaled score, T-score, etc. For instance, a score at the 50th percentile could be reported as a standard score of 100 or a T-score of 50. Both of these scores are considered "average" but are reported on different scales.

It was presented that students who score at the 40th percentile on MAPS would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned, "average" or "proficient" on these assessments is clearly reported on different scales of measurement. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these marginalized populations. I certainly hope that the Board would not

Varotta
Johnson,
School
Psychologist
Clark County
School District

	<p>perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.</p> <p>I urge the board to reconsider the cut-score outlined in the current law.</p> <p>Thank you for your time Varotta M. Johnson ED.S NCSP School Psychologist Eldorado High Rancho High</p>
<p>Franco Carranza, School Psychologist, Clark County School District</p>	<p>Dear Members of the State Board of Education:</p> <p>As a bilingual school psychologist with extensive experience in assessing students' educational needs, I was disappointed to hear that AB400 reinstated the retention piece from Read by Grade 3. The research shows the harmful impact of retaining students, particularly for English Language Learners (ELL) and other minorities, which can affect their self-esteem, social-emotional condition, negatively impact their learning and academic performance, and increase their chances to drop out of school.</p> <p>Now we hear the State Board is looking to set a cut score using MAP data to determine whether a student is retained or not at the end of third grade. I would like the Board to consider the following: when talking about PERCENTILES, NOT percentages, the AVERAGE range is from the 16th to the 84th PERCENTILE. Retaining students within this range would not only be harmful to the student but would also further overwhelm our classrooms, as potentially hundreds of students would be held back. A more reasonable approach, if you are to retain, is to look at students who are in the <i>severely at-risk</i> range which runs from the 1st to the 5th percentile. In regard to ELL students, consideration should be given to the length of time they have been exposed to English instruction, as it can take 4 or more years for them to</p> <p>academically approach peers of the same grade level. Thank you for your time and consideration.</p> <p>Respectfully, Franco Carranza, Ed.S., NCSP School Psychologist Clark County School District Bilingual Psychological Services</p>
<p>Melody Thompson, Nationally Certified School Psychologist</p>	<p>Dear State Board of Education Members:</p> <p>Sadly, AB400 overturned all of the good work that Assemblyman Tyrone Thompson accomplished before his passing to remove the retention piece from Read by Grade 3. Everyone who has studied the enormous amount of research on this topic knows that retention unduly penalizes students of color and students with primary languages other than English; it is highly correlated with violence and school drop out rates; and moreover, retention actually hurts students' academic performance in the long run (see Hattie's Visible Learning meta-analysis data).</p>

	<p>Even so, as you the State Board are charged with setting a cut score, please consider the average range within norm-referenced assessments (e.g., MAP), along with the at-risk and severely at-risk ranges. The average range is: the 16th to 84th percentiles. The at-risk range is: the 6th to 15th percentiles. And the severely at-risk range is the 1st to 5th percentiles.</p> <p>Certainly, students scoring in the average range, starting at the 16th percentile, should never be retained. While retentions may sacrifice students for what we as adults should be doing to help them, please seriously consider using your voice to speak up for wisdom in this decision. Thank you kindly, Melody Thompson Nationally Certified School Psychologist Experienced Data Analysis Researcher</p>
<p>Kathleen Sorrentino, School Psychologist, Clark County School District</p>	<p>Dear Board Members, My name is Katie Sorrentino, and I have been a school psychologist in Clark County School District for almost thirty years. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices, and would cause undo harm to our students. In the course of my work I regularly reference percentiles and other similar statistical data when interpreting assessment results. Score ranges indicating average, or proficient, performance are those that fall between the 16th to 84th percentiles. This is universally and objectively accepted in the fields of research, education, and psychology. Therefore, identifying students at or below the 40th percentile as “at-risk”, or in need of a significantly life altering decision such as retention, is well outside accepted practice and illogical with regards to statistical and data-based decision making. There is also an issue with over-identifying students based on this unsupported approach to quantitative statistics and data analysis, which is the very real danger of disproportionately retaining student subgroups including our Black, ELL, Hispanic/Latino, and IEP students. While perhaps unintentional, indisputable facts indicate this is the reality and would perpetuate a system of discrimination in our schools. I urge the board to reconsider the cut-score outlined in the current law. Thank you for your time, K. Sorrentino School Psychologist</p>
<p>Donna Seals</p>	

	<p>Why are we waiting 5 years before we restart this? So, current 3rd grade students will be starting high school and unable to read?</p>
<p>Andrea Davis, School Psychologist, Clark County School District</p>	<p>To Whom It May Concern,</p> <p>I am a school psychologist who has been working in CCSD since 2001. I would like to weigh in on the requirement for retention that is being considered as AB400. There are numerous reasons that I believe this is a disastrous bill. For the first reason, the cutoff score of the 40th percentile includes a range of scores that still fall within the average range, according to statistics. Percentiles and standard scores are based on a normal distribution, on a bell curve, that indicates that average scores are from the 25th to the 75th percentile, and low average scores are above the 16th percentile.</p> <p>This bill would cause many students who are performing within the average range to be held back. In addition, this bill would have the effect of increasing retention for particular subgroups of students that have historically underperformed on these standardized assessments, such as Hispanic, African American, English Language Learners and students with IEPs. I urge you to reconsider the passing of this bill, and instead look for ways to increase student and parent engagement in the learning process.</p> <p>Thank you for your consideration, Sincerely, Andrea Davis, MS.Ed, NCSP School Psychologist</p>
<p>Anne Sikra, School Psychologist, Clark County School District</p>	<p><i>Hello,</i></p> <p><i>My name is Anne Sikra and I am a school psychologist in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement makes no sense mathematically. If this requirement were followed, 40% of the students in the state would be retained.</i></p> <p>Anne Sikra School Psychologist CP Squires Elementary School Mountain View Elementary School</p>
<p>Loren Campbell, School Psychologist, Clark County School District</p>	<p><i>Good afternoon,</i></p> <p><i>My name is Loren Campbell and I am a school psychologist in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause undo harm to our students.</i></p> <p><i>As a school psychologist, I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. The idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a</i></p>

different score depending on what scale the assessment used -- whether it be a standard score, scaled score, T-score, etc. For instance, a score at the 50th percentile could be reported as a standard score of 100 or a T-score of 50. Both of these scores are considered "average" but are reported on a different scales.

It was presented that students who score at the 40th percentile on MAPS would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned, "average" or "proficient" on these assessments is clearly reported on different scales of measurement. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.

I urge the board to reconsider the cut-score outlined in the current law.

Thank you for your time,
 Loren Campbell, Psy.S.
 School Psychologist
 CCSD Crisis Response Team

Nicole Rubio,
 School Psychologist,
 Clark County School District

Good Morning,
 My name is Nicole Rubio and I am a school psychologist in the Clark County School District. Prior to this, I was a general education teacher for six years. In both of my roles, I became familiar with the NWEA MAP assessment scores and the interpretation of these scores to support students.

I would like to speak to the current requirement for students to be *above the 40th percentile* in MAP otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistical practices and would cause undue harm to our students.

As a school psychologist, I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. I have attached a visual of the normal curve that I use with my teams and parents. The idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a different score depending on what scale the assessment used -- whether it be a standard score, scaled score, T-score, etc. For instance, a score at the 50th percentile could be reported as a standard score of 100 or a T-score of 50. Both of these scores are considered "average" but are reported on a different scales.

It was presented that students who score at the 40th percentile on MAP would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned,

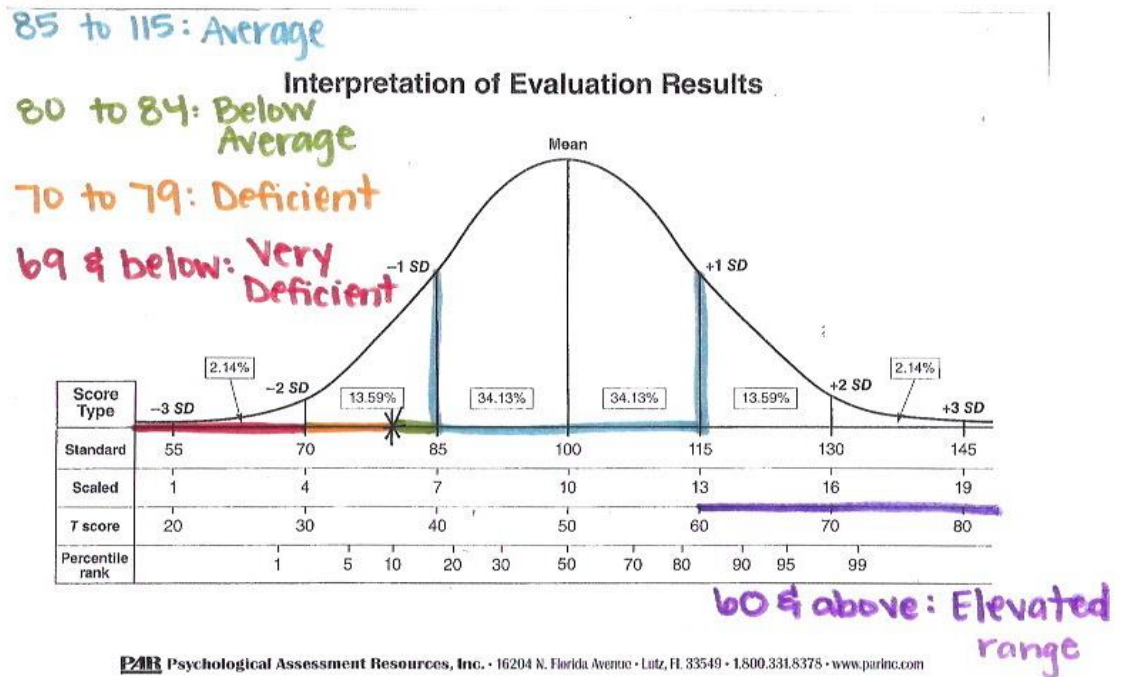
"average" or "proficient" on these assessments is clearly reported on different scales of measurement. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.

I urge the board to reconsider the cut-score outlined in the current law.

Thank you for your time,
 Nicole Rubio, Ed.S., NCSP
 School Psychologist
 Hoggard
 Jo Mackey

(Graphic submitted via email with Public Comment)



Jordan Wenger,
School
Psychologist,
Clark County
School District

Good afternoon,

My name is Jordan Wenger and I am a school psychologist in Clark County School District. I would like to speak to the current requirement for students to be above the 40th percentile in MAPS otherwise they would be subject to mandatory retention. This requirement is not supported by measurement and statistics and would cause undo harm to our students.

As a school psychologist, I frequently reference percentiles when discussing students who may have a disability and demonstrate a need for special education services. I have attached a visual of the normal curve that I use with my teams and parents. The idea of "average" or "proficient" is covered by a range of percentiles -- the 16th to 84th percentile to be exact. The fact that the cut score for mandatory retention in this law is the 40th percentile is not supported by the normal distribution of scores on any given assessment. The 40th percentile is well within the average range. However, any given percentile can result in a different score depending on what measure the assessment uses -- whether it be a standard score, scaled score, *T-score*, etc. For instance, a score at the 50th percentile could be a standard score of 100 or a *T-score* of 50. Both of these scores are considered "average" but are reported on a completely different scale.

It was presented that students who score at the 40th percentile on MAPS would receive a score of 2 on the SBAC, which is considered "proficient" on that assessment. As I mentioned, "proficiency" on these assessments is clearly reported on completely different scales. You are comparing apples and oranges when you attempt to project proficiency on one assessment based on scores of a completely separate test. The MAPS and SBAC underwent unrelated and distinct normative processes and proficiency on one should not be held at the same level as what is considered "proficient" on the other. I understand the idea of attempting to predict students who would be proficient on the SBAC as a way to target these students for additional interventions and support throughout the school year. But that is where the comparison of these two assessments should end. The question of "Does this student require additional support?" is much different than "Should this student be subject to mandatory retention?"

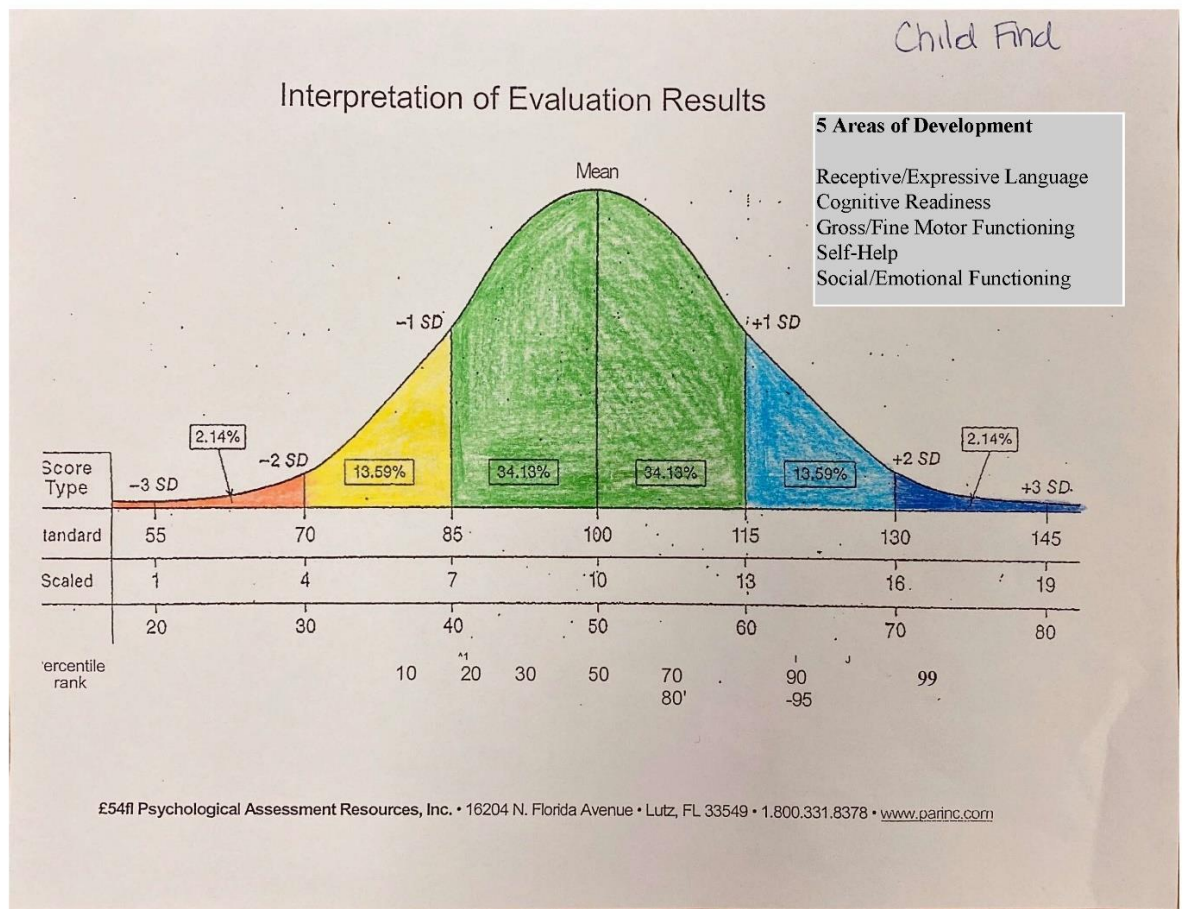
My final concern has to deal with the data that was presented by NWEA regarding the proficiencies of subgroups. As the Board can see, students that fall under the English Learner, Black and Hispanic/Latino and IEP demographics chronically underperform on the MAPS assessment. Their proficiencies are consistently below that of other subgroups. Mandatory retention at the 40th percentile on MAPS would all but guarantee the systematic discrimination of these minority populations. I certainly hope that the Board would not perpetuate these practices by continuing this arbitrary cut-score created by this Read by Grade 3 law.

I urge the board to reconsider the cut-score currently within the law.

Thank you for your time.

Jordan L. Wenger, SSP, NCSP
School Psychologist
Clyde C. Cox Elementary School
Paul E. Culley Elementary School
Mentor/PSA Trainer

(Graphic submitted via email with Public Comment)



Tamara
Filangieri,
School
Psychologist,
Clark County
School District

To Whom It May Concern,

I am a school psychologist within the Clark County School District and I am writing in regard to the Agenda Item: Read by Grade 3 and MAP Assessment Data. It is very important that the retention cutoff score is capturing those students who are honestly scoring within the at-risk range. The retention cutoff score should be the 10th percentile or below; the 10th percentile is considered at-risk. Since MAP data is going to be used to determine retention, we know that NWEA, the developers of MAP, state the average range is from the 16th to the 84th percentiles. This means NWEA considers any score at the 16th percentile or higher to fall within the average range.

A few years back a lot of teachers and other educators believed that students scoring at the 40th percentile or lower on MAPS were considered at-risk. 40th percentile started to grow like a buzzword and as a school psychologist, I am very familiar with percentiles and analyzing data, and I needed to urgently meet with my teams to inform them a score at the 40th percentile is not at-risk. A score at the 40th percentile is not only not at-risk, but is it very much so comfortably within the average range. When a student receives a score at the 40th percentile, that means 'the child scored better than 40% of children their age.' A child scoring better than 40% of other children their age, is not a child who is at-risk. However, a child who scores at the 9th percentile and performs better than 9 percentile of children their age, is considered to be at-risk.

It is imperative that the retention cut off score is determined with an understanding of percentiles and which percentiles are considered at-risk. If the cutoff score is too high and captures students functioning within the average range, this will have negative impacts. Should a student repeat the third grade if they are showing mastery of grade level content? What will happen to these students when they repeat the grade without necessity? The social-

emotional impact that retention plays on young minds is always vital to consider when looking at the possibility of retention. Let's consider the social-emotional impact of retaining students who are on grade level and not struggling within the classroom. Let's also consider the student who is repeating third grade who grows increasingly bored because they already mastered this content the previous year.

I strongly urge you to support a retention cutoff score at the 10th percentile or below. NWEA states the average range on the Reading MAP assessment is from the 16th to the 84th percentiles.

Thank you.

Tamara Filangieri
Nationally Certified School Psychologist
Clark County School District