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July 15, 2026

Dear Dr. Victor Wakefield, Nevada State Superintendent of Public Instruction

RE: PETITION TO ELIMINATE OR SUSPEND SPECIFIED REPORTING REQUIREMENTS

As President of the Nevada Association of School Superintendents (NASS), acting on behalf of the local educational agencies (LEAs) and superintendents statewide, I, AJ Feuling hereby submit this formal petition to the State Superintendent of Public Instruction. This petition respectfully requests the immediate suspension or elimination of specific reporting requirements designated for action in the *School District Reporting Analysis*, incorporated here by reference.

This petition is filed pursuant to the statutory authority granted under NRS 385A.960 and the newly codified administrative procedures established under LCB File No. R080-25.

In order to comply with the implementation guidance provided in Guidance Memorandum 26-11, this cover letter is followed by appendices of individual reports that should qualify as separate submissions under 26-11. There are a total of 16 reports included in the appendices, 13 of which are designated for elimination and three are designated for elimination pending further investigation per the *School District Reporting Analysis*. The reason to include the three additional reports is due to recent clarification from the Nevada Department of Education (the Department) regarding the timeline to transition from Acing Accountability to the District Performance Framework.

I. Contact Information

- AJ Feuling, Superintendent Carson City School District and President Nevada Association of School Superintendents
 - Email: afeuling@carson.k12.nv.us
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II. General Statement of Administrative Burden & Necessity

Nevada's education reporting framework has evolved into an unsustainable, fragmented matrix characterized by the continuous accumulation of mandates without an established sunset or retirement protocol. The recent *School District Reporting Analysis* by Public Works LLC confirms that school district staff face an overwhelming compliance environment that directly undermines educational delivery.

The Hidden Cost of Compliance: A conservative evaluation of just a subset of current reporting mandates across four representative entities reveals that 5,560 staff hours and \$278,000 are consumed annually by legacy reporting obligations. This equates to 2.67 full-time equivalent (FTE) positions or 139 teacher-weeks completely diverted from classroom support, behavioral interventions, and instructional leadership.

This administrative overload is structurally inequitable. While large urban districts must deploy data analysts to manage repetitive files, small and rural districts suffer disproportionately. In rural systems, a single administrator often fills multiple roles simultaneously. Forcing these lean teams to fill out obsolete datasets acts as a de facto resource drain on Nevada's most vulnerable student populations.

III. Reporting Requirements Nominated for Action

Pursuant to the evaluation filters applied in the *School District Reporting Analysis*, the Evaluation Rubric published in Guidance Memo 26-11, and parameters of review established in statute and regulation, NASS petitions for the elimination or suspension of each report submitted independently, as represented in the appendices.

IV. Local Review Certification

The Nevada Association of School Superintendents strongly supports meaningful, transparent public accountability. However, true accountability requires tracking high-value outcomes, not archiving administrative paperwork. Every hour our school leaders spend compiling low-value spreadsheets is an hour taken directly away from supporting Nevada's teachers and students.

This petition was reviewed by A.J. Feuling, Superintendent of the Carson City School District and NASS, and it has been determined to have sufficient merit to warrant state review, and it is understood that reporting requirements remain in effect unless and until an order is issued pursuant to NRS 385A.960.

WHEREFORE, Petitioner respectfully requests that the State Superintendent of Public Instruction exercise the explicit administrative reform authority granted under NRS 385A.960 and LCB File No. R080-25 to immediately suspend, eliminate, or waive the school district reporting requirements enumerated in the Appendices of this petition.

Dated this 15th day of July, 2026.

Respectfully submitted,

AJ Feuling

President, Nevada Association of School Superintendents (NASS)

Representing the 17 School Districts of Nevada and the State Public Charter School Authority

Cc: Dr. Steve Canavero, Executive Director - Education Service Center

Appendix A

Menstrual Products Report

- Source of Requirement: NRS 386.900(4)
- Summary of the Requirement:
 - Every odd-numbered year, LEAs submit a report on the plan to address no cost access to menstrual products. Enacted 2021.
- Explanation/Justification:
 - Initial LEA plans developed approximately 5 years ago, LEAs routinely implement the plan. To date, the report's information has not been used by the Department, the State Board or any other person or entity to support educational outcomes. Eliminating this odd-numbered year report does not alter an LEA's legal requirement to provide product access nor impact any process to hear a formal complaint to the LEA or State due to lack of access.
- Recommendation: Eliminate or Suspend.
 - This report is not required by federal law;
 - No impact on the accountability of public school for their quality; and
 - The administrative burden of producing this report is not justified by its use.

Appendix B

Incident Reports

- Source of Requirement: NRS 388.1351(13)
- Summary of the Requirement:
 - This report is submitted by a principal or designee on a monthly basis to their direct supervisor and it includes the number of reports received at the school related to bullying and discrimination, and the number of times when violations of law are found.
- Explanation/Justification:
 - This report is redundant with standing district practices within their school system. This report is local only, with no requirement or impact at the State level. Any action on this report has no impact on legal protections to students and staff nor does it alter any investigative actions.
 - Acting on this report at the state-level provides assurance that downstream compliance monitoring by NDE will not consider fulfillment of this reporting requirement.
- Recommendation: Eliminate or Suspend.
 - This report is not required by federal law;
 - It is redundant with internal district practices;
 - Transparency is maintained as data are reported publicly through the Nevada Report Card;
 - No impact on the accountability of public school for their quality; and
 - The administrative burden of producing this report is not justified by its use.

Appendix C

Empowerment School Compiled Reports and Audit

- Source of Requirement: NRS 388G.200
- Summary of the Requirement:
 - This report is required on a quarterly basis to be submitted to the Board of Trustees reporting on an Empowerment School's financial status and compliance with the empowerment plan for the school.
- Explanation/Justification:
 - There are no empowerment schools active in Nevada.
 - Acting on this report at the state-level provides assurance that downstream compliance monitoring will not consider fulfillment of this reporting requirement.
- Recommendation: Eliminate or Suspend
 - This report is not required by federal law; and
 - The administrative burden of producing this report is not justified by its use.

Appendix D

Class Size Reduction (CSR) Report on Educators and Variances

- Source of Requirement: NRS 388.700(5)
 - Note: There are references in the *School District Reporting Analysis* to NRS 388.700(7); however, the specific reporting requirement is NRS 388.700(5).
- Summary of the Requirement:
 - The statute requires the NDE to report on a variety of Class Size Reduction elements (e.g., teachers employed in order to attain certain ratios, substitutes, and number of pupils) to various state entities.
- Explanation/Justification:
 - The reporting requirement accompanied a policy framework developed during a time when Class Size Reduction funding from the state was categorical rather than its current funding structure through the PCFP. Under categorical funding, the Legislature was interested in knowing how many teachers were employed through the categorical funding needed to attain certain grade level ratios. With the policy shift away from categorical funding to the PCFP, the reporting requirement is unnecessary - as outlined below.
 - NRS 388.700
 - 5(a): The number of teachers employed is available via the report card.
 - 5(b): The number of teachers employed to attain certain ratios is no longer necessary given the change in funding.
 - 5(c): The number of long term substitutes is available via the report card.
 - 5(d): The number of pupils enrolled is available via the report card.
 - 5(e): The number of teachers in an arrangement other than one teacher per classroom has not typically been collected and requires a significant amount of time to collect.
- Recommendation: Eliminate or Suspend
 - Eliminating this report does not adversely impact Nevada's compliance with federal law;
 - The data collected by this report is redundant with an existing collection; and
 - The administrative burden of producing this report is not justified by its use.

Appendix E

Industry-Recognized Credentials Report

- Source of Requirement: NAC 389.800(9)
- Summary of the Requirement:
 - This regulation requires school districts to report the number of pupils who earn credentials deemed to be industry-recognized by the Office of Workforce Innovation.
- Explanation/Justification:
 - This collection is already fully achieved through the federal Perkins V Consolidated Annual Report.
- Recommendation: Eliminate or Suspend
 - Eliminating this report does not adversely impact Nevada's compliance with federal law;
 - The data collected by this report is redundant with an existing collection; and
 - The administrative burden of producing this report is not justified by its use.

Appendix F

Parent Participation Report

- Source of Requirement: NRS 385A.320
- Summary of the Requirement:
 - This data collection requires districts to collect parent/teacher conference attendance (state file DF28) and include a narrative about efforts taken to communicate with parents (state file TX05). This information is posted on the state's accountability portal.
- Explanation/Justification:
 - Parent and family engagement in a student's learning and school is a critical foundation for success. These data collections attempt to convey engagement (via parent-teacher conference attendance) and attempts by the school to engage parents via a short narrative. The required School Performance Plan posted publicly for each school, and additional requirements within that plan for Title I schools, situate parent engagement within the context of school improvement and provide a more full picture of efforts by the school to engage families and the outcome of those efforts than the duplicative data collections under NRS 385A.320.
- Recommendation: Eliminate or Suspend
 - There is no federal requirement satisfied by this data collection;
 - The information collected and reported by this requirement are collected and publicly reported within the School's Performance Plan - offering a more full picture of parent engagement activities; and
 - The administrative burden of producing this report is not justified by its use.

Appendix G

Reporting of Expenditures for Lobbying Activities

- Source of Requirement: NAC 387.750
- Summary of the Requirement:
 - The regulation requires charter schools or university school for the profoundly gifted to submit a lobbying expenditure report to the NDE if more than \$6,000 is expended on such activities. The report is due in each year in which the Legislature is in session.
- Explanation/Justification:
 - This requirement has been in effect since 2009 and the receiving office within NDE confirmed the report provides no actionable programmatic, fiscal, or educational utility to NDE and is submitted for purposes of complying with this regulation.
- Recommendation: Eliminate or Suspend
 - This report is not required by federal law;
 - No impact on the accountability of public school for their quality; and
 - The administrative burden of producing this report is not justified by its use.

Appendix H

Technology Survey

- Source of Requirement: NRS 385A.520(5)
- Summary of the Requirement:
 - This data collection is reported on the Nevada Report Card (state file DF11) and requires districts to report on technology (e.g., computers over 5 years old with dial up and interactive projections systems) and staffing (e.g., IT technicians and coaches).
- Explanation/Justification:
 - This statute has not been updated in at least 10 years and is referred to as outdated, requiring districts to report on standards no longer in service. The SETNA data collection is referenced as providing more contemporary and relevant information related to technology access and use.
- Recommendation: Eliminate or Suspend
 - This report is not required by federal law;
 - The information within SETNA is more valuable than this required report;
 - No impact on the accountability of public school for their quality; and
 - The administrative burden of producing this report is not justified by its use.

Appendix I: Acing Accountability

Appendix I addresses a complex (n=4) of reports/data collection required under Acing Accountability.

In 2023, Governor Joe Lombardo committed \$2.6B in increased funding for K-12 Education in Nevada. This historical investment in Nevada's K-12 education led to the creation of a new initiative known as Acing Accountability. The aim of Acing Accountability is to ensure that this historical increase in education funding is directly tied to student performance.

As part of Acing Accountability, each school district, the State Public Charter School Authority (SPCSA), and its charter holders are assessed based on the following Essential Questions:

- To what degree are school districts and the SPCSA effectively implementing reading and mathematics resources?
- To what degree are kindergarten through grade 3 (K-3) students demonstrating progress toward mastery in literacy?
- To what degree are grades 4 through 8 (4-8) students demonstrating growth and proficiency in mathematics?
- To what degree are high school graduates prepared for success in college or a career?
- To what degree do school districts and the SPCSA have the workforce to meet the needs of every student?
- To what degree are school districts and the SPCSA using innovative solutions to meet the unique needs of their students?

The NDE instituted a variety of data collections or "[Data Acquisitions](#)" to produce the required annual Acing Accountability Report. Many of the data acquisitions leveraged existing collections while others required a separate, new collection routine from the SPCSA and Districts. The intent of the list of collections below is to request action on each new collection.

Acing Accountability: CCR Participation/Performance

- Source of Requirement: Acing Accountability
- Summary of the Requirement:
 - In order to answer the following question: To what degree are high school graduates prepared for success in college or a career? The NDE collected

data directly from the SPCSA and Districts (e.g., Dual-Credit Course Enrollment)

- Explanation/Justification:
 - With the passage of SB460 and the new District Performance Framework, Acing Accountability will sunset following the publication of Acing Accountability based on the 2025-2026 District Reports (anticipated in late summer/early fall).
- Recommendation: Eliminate
- Rationale:
 - This is not required by state or federal law.
 - The District Performance Framework (DPF) will take the place of Acing Accountability with an informational version of the DPF published in summer 2026, based on SY 2025-2026. Full implementation of the DPF will occur in summer 2027, based on SY 2026-2027 performance.

Acing Accountability: Evidence-Based Instructional Materials

- Source of Requirement: Acing Accountability
- Summary of the Requirement:
 - In order to answer the following question: To what degree are school districts and the SPCSA effectively implementing reading and mathematics resources? The NDE collected data directly from the SPCSA and Districts.
- Explanation/Justification:
 - With the passage of SB460 and the new District Performance Framework, Acing Accountability will sunset following the publication of Acing Accountability based on the 2025-2026 District Reports (anticipated in late summer/early fall).
- Recommendation: Eliminate
- Rationale:
 - This is not required by state or federal law.
 - The District Performance Framework (DPF) will take the place of Acing Accountability with an informational version of the DPF published in summer 2026, based on SY 2025-2026. Full implementation of the DPF will occur in summer 2027, based on SY 2026-2027 performance.

Acing Accountability: 385A.070, Innovative Solutions and Staff Retention and Recruitment

- Source of Requirement: Acing Accountability (only those elements collected separately to fulfill Acing Accountability)
- Summary of the Requirement:

- In order to answer the core questions associated with Acing Accountability, the NDE was required to collect data directly from Districts and the SPCSA.
- Explanation/Justification:
 - With the passage of SB460 and the new District Performance Framework, Acing Accountability will sunset following the publication of Acing Accountability based on the 2025-2026 District Reports (anticipated in late summer/early fall).
- Recommendation: Eliminate
- Rationale:
 - This is not required by state or federal law.
 - The District Performance Framework (DPF) will take the place of Acing Accountability with an informational version of the DPF published in summer 2026, based on SY 2025-2026. Full implementation of the DPF will occur in summer 2027, based on SY 2026-2027 performance.

October 15 Report / Read by Grade 3 Rate of Improvement

- Source of Requirement: NRS 392.775 was repealed in 2025 (SB 278); however, the requirement existed under Acing Accountability.
- Summary of the Requirement:
 - In order to answer the following question: To what degree are grades 4 through 8 (4-8) students demonstrating growth and proficiency in mathematics. The NDE collected data directly from the SPCSA and Districts.
- Explanation/Justification:
 - With the passage of SB460 and the new District Performance Framework, Acing Accountability will sunset following the publication of Acing Accountability based on the 2025-2026 District Reports (anticipated in late summer/early fall).
- Recommendation: Eliminate
- Rationale:
 - This is not required by state or federal law.
 - The District Performance Framework (DPF) will take the place of Acing Accountability with an informational version of the DPF published in summer 2026, based on SY 2025-2026. Full implementation of the DPF will occur in summer 2027, based on SY 2026-2027 performance.
 - NRS 392.775 repealed in 2025 Session

Appendix J

Opt Out of Participating in Breakfast after the Bell Program

- Source of Requirement: NAC 387.370
- Summary of the Requirement:
 - This regulation requires schools required to participate in Breakfast after the Bell Program but seek to opt out of participating to submit to the Department of Agriculture a request to opt out and the number/percent of enrolled pupils, eligibility under National School Lunch Act, and the total cost to the public school or district for the food and labor used in the Program at that school.
- Explanation:
 - Following a consultation with the Department of Agriculture, the information required by this regulation is collected at the time of application and this report is not needed.
- Recommendation: Eliminate or Suspend
 - This report is redundant with a routine collection already submitted;
 - This report is not required by federal law; and
 - The administrative burden of producing this report is not justified by its use.

Appendix K

Application for Special Education Unit

- Source of Requirement: NAC 387.410
- Summary of the Requirement:
 - The regulation requires an application to be submitted to the Superintendent for special education units (funding).
- Explanation/Justification:
 - Following consultation with state partner agencies, the allocation of funding changed with the PCFP and confirmed this requirement is no longer needed.
- Recommendation: Eliminate or Suspend
 - Change in statute renders this unnecessary.

Appendix L

Charter Annual Report Concerning Improvements

- Source of Requirement: NAC 387.710
- Summary of the Requirement:
 - Each charter school and university school for the profoundly gifted is required by this regulation to compile a report concerning the capital improvements owned, leased or operated by the school.
- Explanation/Justification:
 - The State Public Charter School Authority (SPCSA) notes the authorizing NRS for this provision has been repealed, and the dataset has sat entirely unutilized for seven years.
- Recommendation: Eliminate or Suspend
 - Change in statute renders this unnecessary.

Appendix M

Summary of Performance for Graduating Special Education Students

- Source of Requirement: IDEA Section 1414(c)(5)(B)(ii)
- Summary of the Requirement:
 - This is a federal requirement that requires schools to provide special education students who are graduating or aging out with a summary of performance. This document outlines the student's academic achievement, functional performance, and provides recommendations for meeting their post-secondary goals and activities to ensure compliance.
- Explanation/Justification:
 - The state ensured compliance with this federal statute using a separate summary of performance form within Infinite Campus, or an exit IEP is used by some districts to serve as the summary of performance. The NDE has shifted from requiring a separate report collection to ensure compliance with this federal requirement to cyclical monitoring of districts.
 - Note: any action in eliminating separate reporting requirements has no impact on the federal obligations for students with disabilities and NDE's obligation to ensure compliance.
- Recommendation: Eliminate or Suspend the additional reporting requirement
 - Changes in NDE processes integrate compliance with this section of federal law into existing cyclical monitoring routines, rendering the prior reporting unnecessary.